



Environmental Risk Assessment

Environmental Permit Application – Tilmanstone Works

January 2023

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Quality Assurance – Approval Status

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 & Approved by
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Comments

Comments

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1. Introduction

1.1 The Brief

Waterman Infrastructure & Environment Limited (“Waterman”) is instructed by Ovenden Tipper Services Limited (OTS) to prepare four Environmental Permit (EP) applications to the EA. The four applications relate to two existing standard rules EPs authorising waste management activities on the yard at Tilmanstone Works, Pike Road Industrial Estate, Eythorne, Dover, CT15 4ND.

The two EPs are specifically:

- a standard rules SR 2010No12 Treatment of waste to produce soil, soil substitutes and aggregate, reference EPR/DB3502CD; and
- a standard rules SR2009No6 – inert and excavation waste transfer station with treatment, reference EPR/DB3001FF.

Waterman is submitting the following EP applications:

1. a partial surrender of EPR/DB3502CD (application 1);
2. a partial surrender of EPR/DB3001FF (application 2);
3. a variation to EPR/DB3502CD, to convert it to a bespoke EP covering a wider area of land (application 3); and
4. a partial transfer of EPR/DB3502CD to East Kent Recycling Limited (application 4).

This document relates to application 3, the variation of EPR/DB3502CD. The intention of this application is to vary the EP from an SR2010No12¹ to a bespoke EP based on the best fit standard rules, and revise the EP boundary to increase the permitted area to include the land removed from EPR/DB3001FF by application 2.

This application will require the support of an Environmental Risk Assessment (ERA) that analyses the potential environmental risks that the waste activities carry. This ERA will be conducted in accordance with EA guidance². This report shall be submitted as the ERA.

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 but the proposals do not meet all the criteria. In such cases only those aspects lying beyond the scope of the standard rules require assessment.

Recently, the EA has advised the existing standard rules EP no longer applies because of priority habitats and protected species reported in the vicinity of the site since the time of EP issue – specifically the distance between the site and deciduous woodland habitat and records of “Code 2” protected species reasonably assumed to relate to [REDACTED] on land to the west of the site. The activities and infrastructure proposed for the facility are as required by the existing standard rules EP (SR2010No12 – treatment of waste to produce soil, soil substitutes and aggregate). The information received from the EA is included in Appendix C.

These variations from the standard rules are therefore subject to assessment in accordance with the EA guidance. 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).

Application 3 also seeks to extend the permitted boundary to include an area of permeable hardstanding. This change is within the terms of the best fit standard rules EP and so it not considered further in this report.

¹ SR2010 No12 - Treatment of waste to produce soil, soil substitutes and aggregate (publishing.service.gov.uk) (accessed October 2022)

² Risk assessments for your environmental permit - GOV.UK (www.gov.uk) (accessed November 2022)

1.3 Limitations and Constraints

This report has been prepared in accordance with the scope agreed between Waterman and OTS, as documented in Waterman's fee letter (WIE18644-100-220812-SO-Fee dated 12 August 2022) and with Waterman's standard Terms of Appointment.

The benefit of this report is made to OTS.

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 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 TR28875074. It is located in the north-western portion of the Pike Road Industrial Estate, near Tilmanstone, Kent. The site occupies most of a yard of approximately 3 hectares (ha) in extent. The site is accessible from Pike Road via a single entrance to the south.

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

2.2 Site Environs

The surroundings of the Pike Road Industrial Estate are predominantly agricultural.

The yard is part of a larger site, flanked to the east by a 1 ha building that houses a material recycling facility and a waste transfer station, as well as a former colliery spoil tip to the west. Deciduous woodland forms the northern perimeter of the site.

The nearest population centres are the villages of Elvington and Eythorne, that lie west and southwest of the facility, at distances of approximately 770m and 890m, respectively.

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

Table 1: Summary of surrounding land uses

Location	Description
North	Farmland and residential properties
East	Pike Road, farm and agricultural land, Pike Road Industrial Estate
South	Pike Road Industrial Estate, Eythorne, Pike Road Industrial Estate including Bakkavor Salads.
West	Unrestored colliery spoil tip, the village of Elvington and farmland, Pike Road Industrial Estate

In Appendix A, there is plan showing the sensitive receptors that may be negatively impacted by the waste activity being applied for. The plan covers a 500m radius around the site boundary.

2.3 Waste Management Activities

2.3.1 SR2010No12 Environmental Permit

The facility has operated under an SR2010No12 EP, in order to generate value as a recycled aggregate production operation.

All waste activities, including processing and storage, take place in the yard, without any form of enclosure. In terms of site surfacing, the permitted area is comprised mostly of impermeable concrete (approximately 2.5 ha), with the rest being unsurfaced permeable hard standing.

The facility conducts the following activities on site:

- storage of waste pending recycling or reclamation;
- the recycling or reclamation of organic³ and inorganic materials;
- treatment of wastes used for recycling or reclamation of soil, soil substitutes and aggregate are limited to;
 - sorting;
 - separation;
 - screening;

³ Under the limitation that the organic substances are not used as solvents.

- crushing; and
- blending.

The site currently operates under the following waste storage and processing limits, as defined in the SR2010No12:

- not more than 10,000 tonnes of wastes specified in table 2.4 at any given time;
- not more than 40,000 tonnes of any other wastes at any given time; and
- not more than 75,000 tonnes of waste may be processed annually.

The generation of recycled aggregate from inert waste feedstock is conducted in line with the appropriate quality protocol⁴, 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 site for sale.

Under the site's planning permission decision notice (DO/17/1244) the facility may operate between 7am to 6pm on weekdays and 7am to 1pm on Saturdays.

⁴ End of Waste Criteria for the production of aggregates from inert waste, accessible from https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/296499/LIT_8709_c60600.pdf (accessed 31 October 2022)

3. Comparison of Variation Proposals with Environmental Permit - SR2010No12

The SR2010No12 ruleset has been reviewed in order to identify the differences between the standard rules and the activities proposed at the facility.

Rule 2 – Operations

The proposal is for a variation of section 2.2 The site, specifically provision 2.2.2:

- *“The activities shall not be carried out within:*
 - *(g) 50 metres of a site that has species or habitats protected under the Biodiversity Action Plan (BAP) that the Environment Agency considers at risk to this activity*
 - *250metres within the presence of* [REDACTED]

The facility is within 50m of a site that contains a habitat protected by the BAP – deciduous woodland.

The EA suspects the facility is within 250m of locations recorded with [REDACTED] present⁵.

No further variations from the standard rules EP are proposed. The only other proposed variation is to the permitted boundary – not the rules of the permit.

For clarity and the avoidance of doubt, no variations from the standard rules EP are proposed for the following sections of the SR2010No12 standard rules:

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

⁵ According to the appended (C) EA Nature and Heritage Conservation screening report there is a “Code 2” protected species within 500m of the facility.

4. Limits of the Assessment

As outlined in the report context and structure section, this assessment is limited to consideration of risks to the deciduous woodland and the potential presence of a code 2 protected species [REDACTED]

The proposed extension of the permit boundary included in the EP variation application will result in permeable hardstanding being incorporated into the predominantly impermeable permitted area. A bespoke EP based on the best fit standard rules (SR2010no12) is unaffected by the difference in surfacing due to the permitted area existing outside of groundwater Source Protection Zones 1 and 2⁶.

As stated in SR2010no12 Table 2.4 Operating techniques; *“When located outside groundwater Source Protection Zones 1 or 2 all permitted wastes shall be stored and treated on hard-standing or on an impermeable surface with sealed drainage system”*.

The risk to ground and ground water as result of changes to the permitted boundary will not be considered any further in this report.

5. Assessment of Risks Posed by Site Location

5.1 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 deciduous woodland is agreed to be present as a receptor. The findings of a recent ecological appraisal do not find potential habitat for [REDACTED] to be present within 250m of the site.

The Generic Risk Assessment (GRA) for the SR2010No12 EP has been used as a basis for a review of the potential risks to the deciduous woodland and may be found below. The environmental risks posed by the facility in all other respects has been covered by the GRA for SR2010No12 EP which may be found in Appendix B.

5.2 Deciduous Woodland

An EA Nature and Heritage Conservation screening report identified the presence of a BAP protected habitat - deciduous woodland. The report and enclosed maps may be found in Appendix C. This habitat type is found to the immediate north of the facility and is present around the periphery of the former colliery spoil site. The height difference between the deciduous woodland and the site surfacing is approximately six metres. There is an earth bund separating the site from the deciduous woodland that is supported by a retaining wall that is approximately three metres tall. The earth bund and retaining wall are visible in the centre of the figure shown below.

Figure 1: Photograph of bund and retaining wall



Source: Photograph taken by Waterman, 14 April 2022.

The deciduous woodland classification of protected habitat comprises the majority of semi-natural woodland in southern England, typically less than 20 ha in size⁷. Occurring predominately in enclosed landscapes, often with well-defined boundaries. This habitat is characterised by a high level of species diversity, often forming a non-contiguous mosaic with other habitat types. Total coverage of this protected habitat type was thought to be 250,000 ha in the 1980s, this is has likely declined approximately 30-40% since then. The type of deciduous woodland in question has been identified as Beech and Yew woodland.

Deciduous woodland can be impacted by the waste activities taking place at the facility. Dust generated may result in smothering, which can deleteriously affect processes including:

⁷ UK Biodiversity Action Plan: Priority Habitat Descriptions. BRIG (ed. Ant Maddock) 2008. (Updated Dec 2011) p38 Accessible at [UK Biodiversity Action Plan: Priority Habitat Descriptions \(Updated December 2011\) \(incc.gov.uk\)](https://www.incc.gov.uk/) (accessed November 2022)

- photosynthesis;
- respiration;
- transpiration; and
- may facilitate infiltration by gaseous phytotoxic pollutants⁸.

Communities of plants such as deciduous woodland may have its community structure altered because of dust deposition preventing typical plant growth and behaviour.

The applicant commissioned Icen Ecology to review the site and surroundings, resulting in an ecological appraisal being prepared in December 2022. The report anticipated that despite being within 50m of the permitted boundary, there will be no further adverse impacts to the deciduous woodland over and above its current baseline and therefore it was not at risk. The ecological appraisal has been included in Appendix D.

5.3 [REDACTED]

The EA screening report included at Appendix C identifies the location of protected species as hatched areas. This is believed to be so that the actual locations data are reported for are masked. During the data review phase of the ecological appraisal, records for [REDACTED] in the vicinity of the hatched areas were found – the actual data points being more than 250m from the site boundary. Furthermore, a pond identified from the data review phase as present within 250m, was found to no longer be present.

The ecological appraisal has been included in Appendix D.

Due to the absence of suitable habitat for [REDACTED], as shown by the ecological appraisal, the code 2 protected species [REDACTED] will not be considered any further in this report.

5.4 Review of Generic Risk Assessment for SR2010No12

5.4.1 Risk assessment approach

Activities, processes and wastes accepted that are associated with SR2010No12 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 level of risk at distances over 500m from a permitted facility. To assess risks specifically to the BAP protected deciduous woodland that is the concern of this report, a further risk assessment must be produced in the same vein as the SR2010No12 GRA.

The risk assessment may be found in the table below.

5.4.2 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 featured in the 'Comments and risk management column'.

⁸ Farmer, A. (1993) 'The effects of dust on vegetation – a review', Environmental pollution, vol 79, no. 1, Pages 63-75

Table 2: Review of Generic Risk Assessment (GRA) for SR2010No12: location of the site within 50m of the deciduous woodland protected habitat

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	Dust and Emissions Management Plan (DEMP)	<p>The prevailing wind direction for the site is from the southwest, and typically between 3.09m/s and 8.23m/s. The protected habitat lies north of the site.</p> <p>By blowing towards the protected habitat and from the waste activity, the prevailing winds will assist airborne emissions in reaching the deciduous woodland.</p> <p>A visualisation of the data collected from Manston Airport weather station can be found in Appendix E.</p> <p>Given the proximity of the protected habitat which by its nature could be adversely impacted by dust, a DEMP has been prepared and submitted as part of this variation application. The DEMP includes a dust risk assessment as well as mitigation and management actions.</p>	Low
Litter (harm to animal health by ingestion or entrapment, smothering of flora and loss of amenity value of the protected area)	Medium	DEMP	The permitted waste types have low litter potential. The wind speed and direction data discussed above are also relevant to this potential linkage. Given the risk litter poses to the protected habitat, the risk is assessed in the DEMP and management and mitigation measures are set out.	Low
Debris and mud on local road (amenity and safety impacts)	N/A	N/A	This risk is not applicable to the protected area, as there are no roads through the deciduous woodland.	N/A
Odour (loss of amenity value of the protected area)	N/A	N/A	N/A	N/A
Noise and vibration (disturbance of sensitive fauna)	Medium	Noise and vibration management plan if required.	The deciduous woodland itself will not be impacted by noise and vibration. Whilst the fauna it supports could be it is noted the site is existing and is on the edge of an industrial area. It is therefore considered likely the fauna will have become habituated to noise from activities in the yard. It is noted the sites planning permission limits operating hours so that there are no activities overnight or in the early morning when fauna may be more active. A noise and vibration management plan is considered unnecessary and is not proposed.	Low

GRA Source and Potential Harm	GRA Magnitude of Risk to protected areas	GRA Risk Management	Comments and Risk Management	Residual Risk
Scavenging animals and birds and pests e.g. flies (predation of sensitive fauna and flora)	Medium	DEMP	<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.</p> <p>The potential for the facility to provide harbourage for scavengers and pests is addressed in the DEMP.</p>	Low
Flooding of site (contamination of surrounding land and downstream with wastes)	Medium	Accident procedures and contingency plans	<p>The area is designated flood zone 1 and therefore there is a low probability of flooding from rivers or the sea.</p> <p>If the site was to be impacted by surface water flooding during heavy rainfall, the protected habitat will be protected by the difference in ground level – the protected habitat is several metres higher than the yard surface.</p>	Negligible
Site hazards such as machinery and wastes (bodily injury by plant and equipment to unauthorised human and livestock visitors)	N/A	N/A	<p>This risk is not relevant to the protected habitat. Mobile plant from the site cannot access the deciduous woodland due to the difference in ground levels and the presence of a retaining wall, and so physical damage cannot be caused to the woodland.</p>	N/A
Arson / vandalism leading to polluting releases (all environmental media including controlled waters)	Medium	Accident procedures, contingency plans and Environmental Management System (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 protected habitat via groundwater and surface water pathways are minimal – groundwater is at depths below the root zone of deciduous woodland and the habitats elevation above the yard surface 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 effect on the deciduous woodland.</p> <p>Whilst airborne pollutants would be blown over the deciduous woodland due to the prevailing wind direction, fires on mobile plant or equipment are likely to be infrequent and of short duration.</p> <p>In accordance with EP condition, the facility is operated in accordance with an EMS, complete with accident procedures and contingency plan. To specifically mitigate unauthorised site access and in turn vandalism, the facility has site security procedures in place as part of its EMS.</p>	Low

GRA Source and Potential Harm	GRA Magnitude of Risk to protected areas	GRA Risk Management	Comments and Risk Management	Residual Risk
Direct runoff with suspended solids, spillages of liquids leading to acute effect on surface water quality and on downstream abstractions	Medium	DEMP, accident procedures, contingency plans and EMS	The deciduous woodland is 6m higher than the site and there is no plausible pathway for direct runoff from the site to the deciduous woodland.	Negligible
Indirect runoff via soil layer with suspended solids, spillages of liquids leading to chronic effects on surface water quality and on downstream abstractions	Medium	DEMP, accident procedures, contingency plans and EMS	There are no bodies of surface water present within 1km, so there is no pollutant linkage to surface water quality or downstream abstractions. Accident procedures, contingency plans and the DEMP will mitigate the risk to surface water quality in a general sense, as an example risks caused by chemical spills.	Negligible
Contaminated surface water leading to chronic groundwater contamination requiring treatment of water or closure of borehole	Medium	DEMP, accident procedures, contingency plans and EMS	This risk is inapplicable to protected habitat areas. Groundwater is present at depths below the root zone of deciduous woodland.	Negligible
Contaminated surface waters used for recreational purposes (harm to human health)	N/A	N/A	This risk is inapplicable to protected habitat areas.	N/A

5.5 Risk Management Actions Required

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

Dust and Emissions Management Plan

A plan for controlling potential fugitive emissions produced using the EA's Dust and Emissions Management Plan (DEMP) template and guidance⁹, will be utilised and incorporated into the site's EMS. The DEMP will be submitted as part of the EP variation application and can be found elsewhere in the application bundle.

The DEMP will account for environmental risks that may cause harm or negatively impact amenity due to the following fugitive emissions, with a specific focus on protecting the deciduous woodland:

- dust;
- litter;
- mud; and
- pests.

Accident Plan

Accident procedures and contingency plans have been incorporated into the EMS that is active at the facility. These procedures and plans are designed to manage the environmental harm caused by potential incidents that may take place at the facility.

Environmental Management System

The facility operates in accordance with an approved EMS that developed using EA guidance¹⁰. The EMS governs the operating practices of the facility to ensure compliance with the current EP and will be adjusted to be compatible with the proposed bespoke EP.

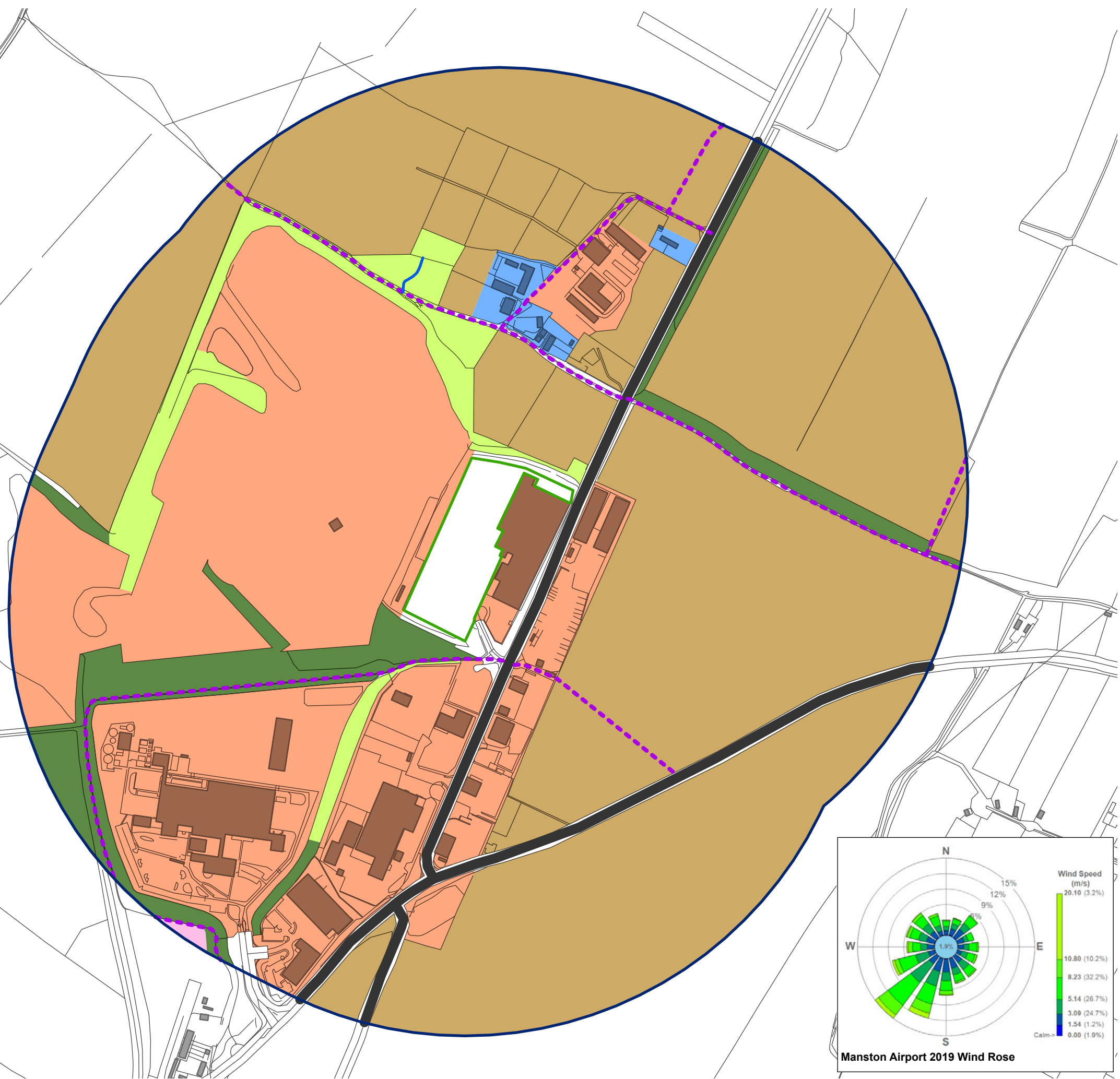
⁹ EA Dust & Emission Management Plan version 10, released in October 2018 (procured from the EA directly using air.quality@environment-agency.gov.uk)

¹⁰ [Develop a management system: environmental permits - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/develop-a-management-system-environmental-permits) (accessed September 2022)

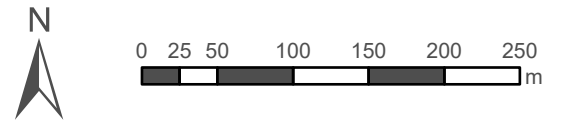
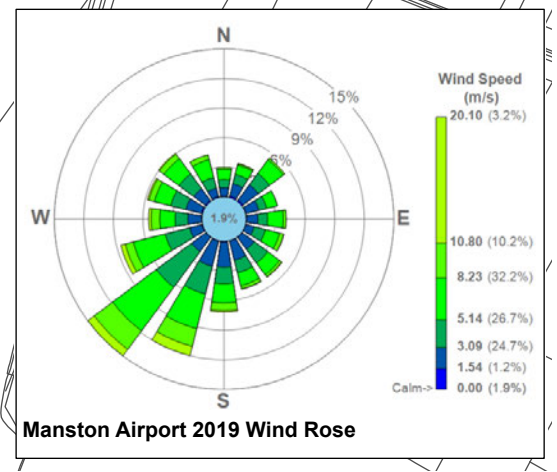
APPENDICES

A. Plans and Drawings

- 500m Sensitive Receptors Plan (WIE18644-100_GIS_WA_1B)



- Permit Boundary
- 500m Study Area
- Agricultural
- Commercial / Industrial
- Deciduous Woodland (EA Screened)
- Public Spaces
- Residential
- Woodland
- Public Highways
- Public Rights of Way
- Surface Water



Project Details	WIE18644-100: Tilmanstone Works, Dover
Figure Title	Figure 1: Identified Human and Environmental Receptors within 500m of the Site
Figure Ref	WIE18644-100_GIS_WA_1B
Date	January 2023
File Location	N:\Projects\WIE18644\100\GIS\WIE18644-100_GIS_WA_1B

B. Generic Risk Assessment for SR2010No12

Generic risk assessment for draft standard rules set number SR2010No12 v 2.0

Standard Facility:	Waste Operation: Treatment of waste to produce soil, soilsubstitutes and aggregate
Location:	Applies to all potential locations.
Location of environmentally sensitive sites (km / m):	Greater than 500m (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 of waste (R13) and treatment to produce soil, soil substitutes roadstone and aggregate(R3,R5).
- Parameter 2 Permitted waste types - Non Hazardous as listed in rules other than waste consisting solely or mainly of dusts, powders or loose fibres or waste in liquid form
- 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 Specified waste shall be stored and treated on an impermeable surface with sealed drainage system when located within groundwater source protection zones 1 or 2 or on hard standing.
- Parameter 6 The only point source discharges to controlled waters or groundwater, are surface water from the roofs of buildings 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); 250 metres with the presence of [redacted]; 50 metres of a site that has relevant species or habitats protected under the Biodiversity Action Plan that the Environment Agency considers at risk to this activity or 50 metres of a National Nature Reserve (NNR), Local Nature Reserves(LNR), Local Wildlife Site (LWS), Ancient woodland or Scheduled Monument.
- Parameter 8 The activities must also be 10 metres from any watercourse and be 50 metres from any spring or well, or of any borehole not used to supply water for domestic or food production purposes or 50m from any spring or well or any borehole used for the supply of water for human consumption. This must include private water supplies.

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 non hazardous 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. The permitted level of throughput and potential size of the facility means 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 (excluding odour and noise) shall not cause pollution. The operator shall not be taken to have breached this rule if appropriate measures, including, but not limited to, those specified in any approved emissions management plan, have been taken to prevent or where that is not practicable, to minimise, those emissions. SR (if required) - emissions management plan.	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 (excluding odour and noise) shall not cause pollution. The operator shall not be taken to have breached this rule if appropriate measures, including, but not limited to, those specified in any approved emissions management plan, have been taken to prevent or where that is not practicable, to minimise, those emissions. SR (if required) - emissions management plan.	Very low

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	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 and non hazardous so any waste washed off site will add to the volume of the local post-flood clean up workload, rather than the hazard.	SR -requires a written management system that identifies and minimises risks of pollution, including those arising from operations, maintenance, accidents, incidents, non-conformances (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 therefore only 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, fire fighters 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 any flammable materials so a low magnitude risk is estimated.	SR -requires a written management system that identifies and minimises risks of pollution, including those arising from operations, maintenance, accidents, incidents, non-conformances (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 fire fighters. Pollution of water or land.	As above.	Medium	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. No point source emissions to water are permitted, but 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 , with appropriate measures. Wastes from potentially contaminated sites require analysis. Storage & spreading has distance limitations from	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. Also activities must be 50 metres from any spring or well, or from any borehole not used to supply water for domestic or food production purposes or 50m from any spring or well or any borehole used for the supply of water for human consumption. This must include private water supplies	Very low

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).
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 (excluding odour and noise) shall not cause pollution. The operator shall not be taken to have breached this rule if appropriate measures, including, but not limited to, those specified in any approved emissions management plan, have been taken to prevent or where that is not practicable, to minimise, those emissions. 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 (excluding odour and noise) shall not cause pollution. The operator shall not be taken to have breached this rule if appropriate measures, including, but not limited to, those specified in any approved emissions management plan, have been taken to prevent or where that is not practicable, to minimise, those emissions. At 500 metres or above, the potential hazards from the permitted activities pose a low risk to the broad sensitivity of species and habitats groups. The standard permit only applies at this distance or more. It is also a requirement of SR. Also activities should not be within 250 metres [redacted] [redacted] [redacted] or 50 metres of a site that has relevant species or habitats	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/DB3502CD/V006) dated 24 August 2022.

Nature and Heritage Conservation

Screening Report: Bespoke Waste

Reference	EPR/DB3502CD/V006
NGR	TR 28882 50706
Buffer (m)	100
Date report produced	24/08/2022
Number of maps enclosed	2

The protected species and habitats identified in the table below must be considered in your application.

Protected Species	Screening distance (m)	Further Information
Code 2	up to 500m	Natural England National Biological Network (NBN)

Protected Habitats	Screening distance (m)	Further Information
Deciduous woodland	up to 50m	Natural England

Unfortunately we cannot provide you with the details of all protected species. This is because we either have not been given permission by the owner of the species data, or they have asked us not to identify the species as they are vulnerable. In these instances you must contact the relevant organisation listed above. A small administration charge may be incurred for this service.

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.

customer service line
03708 506 506

incident hotline
0800 80 70 60




floodline
0845 988 1188

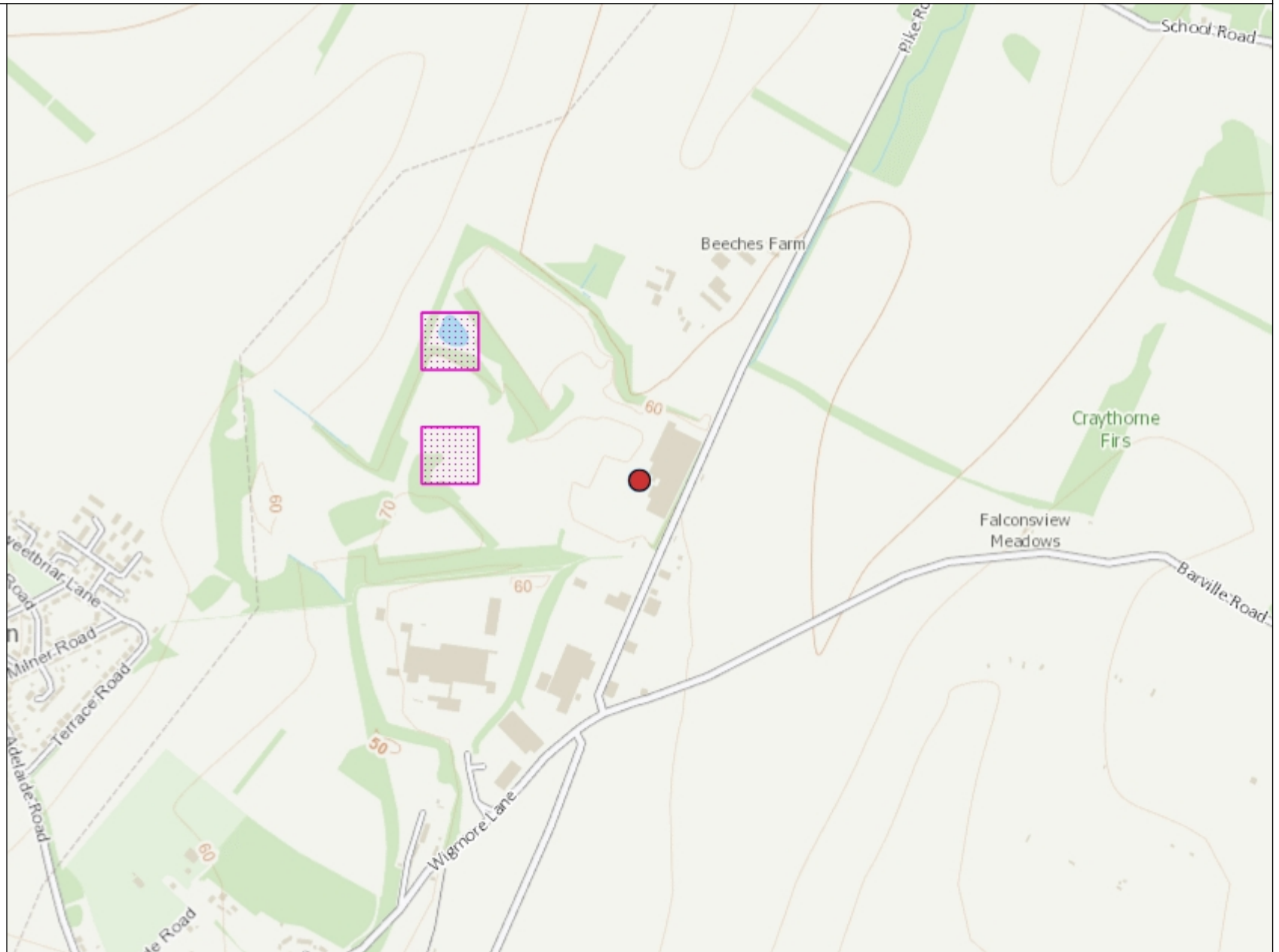
www.environment-agency.gov.uk

Protected Species

Legend


Protected species screened for Env Permits - complete set

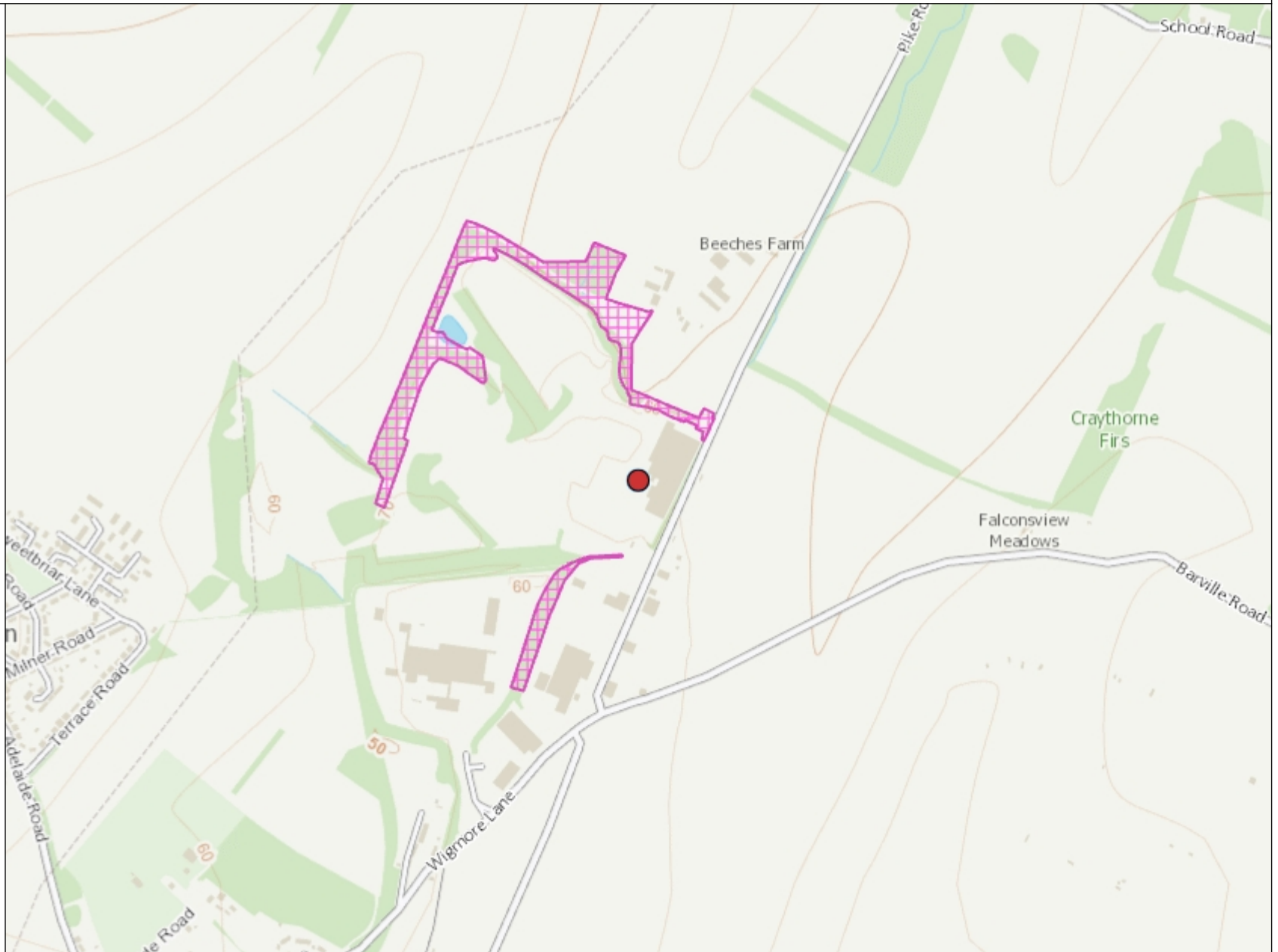
-  Protected species, non fish
-  Protected fish
-  Protected fish migratory route



Protected Habitats

Legend

-  Protected Habitats screened for En Permits



D. Icení Ecological Appraisal

- Ecological Appraisal, Tilmanstone Works, Pike Road Industrial Estate, Pike Road, Eythorne, Dover, Kent, CT15 4ND for Ovenden Tipper Services Limited, December 2022.

Ecological Appraisal

**Tilmanstone Works, Pike Road Industrial Estate,
Pike Road, Eythorne, Dover, Kent, CT15 4ND
for
Ovenden Tipper Services Limited**

Icení Ecology Ltd.



December 2022

Icení Ecology Ltd.

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Conditions of Use

According to the purpose of the report, survey information supplied reflects the findings of the surveyor at the time of the visit. Species and habitats are subject to change over time, some species may not be apparent at certain times (for example: subject to seasonal variation) and some species may colonise a site after a survey has been completed. These matters should be considered when using this report.

Iceni Ecology Ltd. takes no responsibility for ecological features present after the date of the most recent survey conducted by Iceni Ecology Ltd. Ecological information over two years old is typically updated before being used in a decision-making process. Ecological information more than five years old should be considered of historic interest only and not be relied on for decision making.

Any advice, opinions, or recommendations within this document (a) should be read and relied upon only in the context of the document as a whole; (b) do not, in any way, purport to include any manner of legal advice or opinion; (c) are based upon the information made available to Iceni Ecology Ltd. at the date of this document and on current UK standards and practices as at the date of this document. No liability is accepted by Iceni Ecology Ltd. for any use of this document, other than for the purposes for which it was originally prepared and provided.

The normal practice of Iceni Ecology Ltd. is to issue an initial report for comment, incorporating any comments considered relevant into a revised final report. The final report will be issued in an electronic portable document format (PDF) (Adobe). If no further comments are received within two weeks of issuing the initial report, Iceni Ecology Ltd. will issue final reports automatically.

Following final delivery of this document to the Client, Iceni Ecology Ltd. will have no further obligations or duty to advise the Client on any matters, including development affecting the information or advice provided in this document.

Drusilla Hall is a full member of the Chartered Institute of Ecology and Environmental Management (CIEEM) and is a Chartered Environmentalist (CEnv). The code of professional conduct is subscribed to for all work.



Project	Author	Status	Date
OTS Ltd. Ref: 22 0054	Drusilla Hall BSc (Hons) MCIEEM CEnv  Bat Licence: 2015-10742-CLS-CLS (Level 2). Dormouse Licence: 2016-20740-CLS-CLS.  (Level 2).	V1.0	December 2022

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INTRODUCTION

Instruction and background

Iceni Ecology Ltd. was instructed by Ovenden Tipper Services Limited, 'the Client', to undertake an Ecological Appraisal at Tilmanstone Works, Pike Road Industrial Estate, Pike Road, Eythorne, Dover, Kent, CT15 4ND ('the site') to support an application for an Environmental Permit (EP) from the Environment Agency (EA).

Location and description of site

The site currently comprises an operational recycling business. It is located north of Dover, Kent, between Eythorne to the south and Tilmanstone to the north-east; centred on approximate Ordnance Survey (OS) National Grid Reference TR 28899 50710 (Figure 1).

The site is in a rural setting alongside similar businesses, quarrying and light industrial along the Pike Road Industrial Estate. In the wider context the site is surrounded by mostly arable fields.

The redline boundary (site ownership) of the site is shown as Figure 2.

Figure 1: Location of site, centred on blue marker.

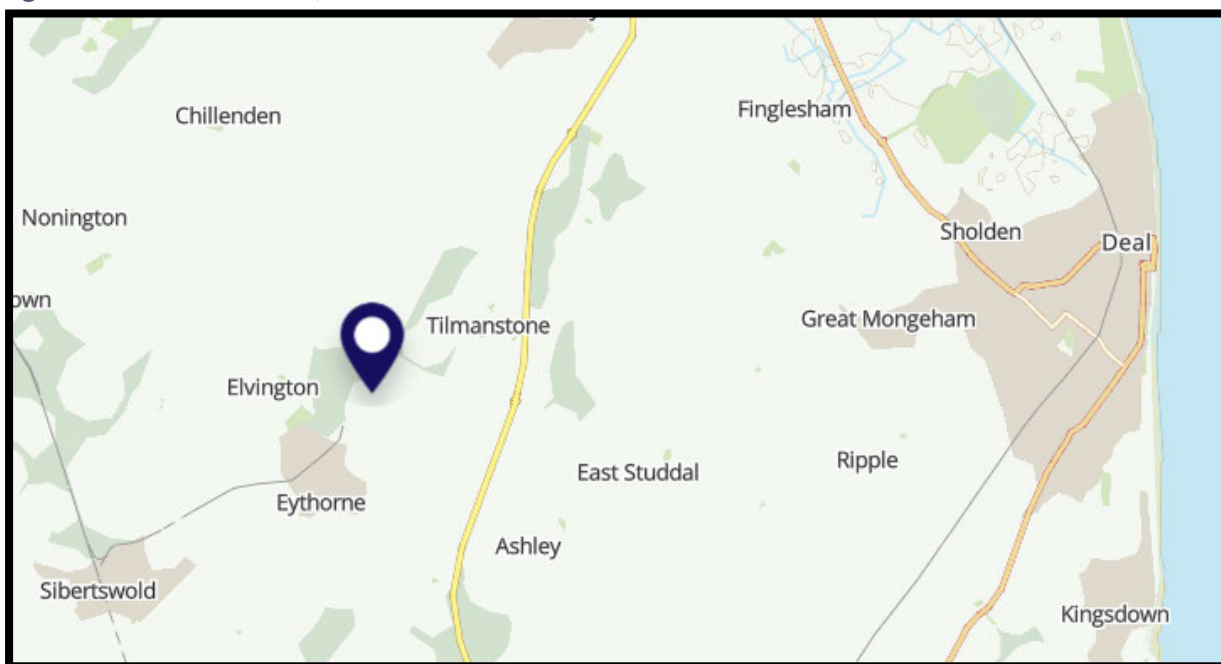


Figure 2: Redline boundary (site ownership).

Environmental permitting

The site has an existing EP, however the Client now proposes to reduce its spatial extent and thus required to apply to the EA to vary the boundary of the existing EP. The application entails converting the existing EP to one which is bespoke and based upon the EA's "Standard Rules SR2010 No.12¹". Rule 2.2.2 applies specifically to ecology and the site's proximity to designated sites and other criteria.

This Ecological Appraisal provides the necessary information to satisfy compliance under Rule 2.2.2, as shown below:

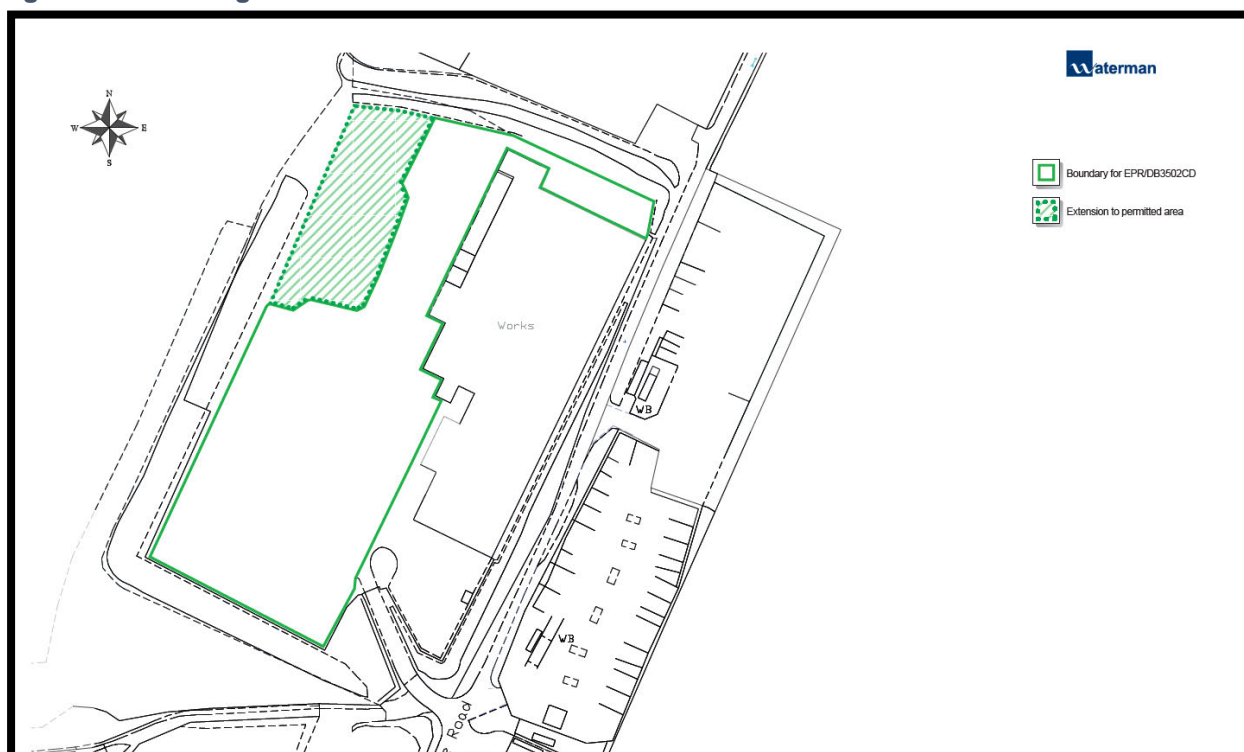
¹ Environment Agency. Standard rules, Chapter 4, The Environmental Permitting (England and Wales) Regulations 2016. Standard rules SR2010 No.12. Treatment of waste to produce soil, soil substitutes and aggregate.

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);
- (b) 10 metres of any watercourse;
- (c) 50 metres of any spring or well, or any borehole not used to supply water for domestic or food production purposes;
- (d) a specified AQMA.
- (e) 50 metres from any well, spring or from any borehole used for the supply of water for human consumption. This must include private water supplies.
- (f) 250metres within the presence of Great Crested Newts where it is linked to the breeding ponds of the newts by good habitat;
- (g) 50 metres of a site that has species or habitats protected under the Biodiversity Action Plan that the Environment Agency considers at risk to this activity;.
- (h) 50 metres of a National Nature Reserve (NNR), Local Nature Reserves(LNR), Local Wildlife Site (LWS), Ancient woodland or Scheduled Ancient Monument.

Figure 3 below shows the boundaries of the existing permit EPR/DB3502CD (solid green), which is being surrendered and the new extension in hatched green.

Figure 3: Permitting boundaries.



This report will cover the impacts of both permitting boundaries on ecology in terms of Rule 2.2.2.

Relevant wildlife legislation

Certain habitats and species are protected under legislation. The principal legislation relevant to the proposed development is as follows:

- The Conservation of Habitats and Species Regulations 2017 (as amended) ['The Habitats Regulations']. The Habitats Regulations implement The Habitats Directive 1992 [92/43/EEC] into English Law.
- European Union (Withdrawal Agreement) Act 2018 (as amended).
- Wildlife & Countryside Act 1981 (as amended) (WCA).
- The Natural Environment & Rural Communities Act 2006 (NERC).
- The Countryside & Rights of Way Act (2000) (CRoW).
- The Protection of Badgers Act 1992 (The Badgers Act).
- The Wild Mammals (Protection) Act 1996.
- The Hedgerows Regulations 2007.

SURVEY METHODOLOGY

Desk study

Designated areas

Web based resources² and records from the Kent & Medway Biological Records Centre (KMBRC) were used to identify statutory and non-statutory designated areas within 1km and 1km of the site. Scheduled ancient monuments were also searched for.

Statutory designated wildlife areas

Statutory designated wildlife areas include European sites (Special Protection Areas (SPA), Special Areas of Conservation (SAC) and Ramsar sites); Sites of Special Scientific Interest (SSSI), National Nature Reserves (NNR) and Local Nature Reserves (LNR).

Impact Risk Zones (IRZs) are a tool developed by Natural England to make a rapid initial assessment of the potential risks to Sites of Special Scientific Interest (SSSIs) and other statutory designed wildlife sites, posed by development proposals. They define zones around each designated site which reflect the particular sensitivities of the features for which it is notified and indicate the types of development proposal which could potentially have adverse impacts. The IRZs also cover the interest features and sensitivities of European sites, which are underpinned by the SSSI designation and 'Compensation Sites', which have been secured as compensation for impacts on Natura 2000/Ramsar sites.

Local planning authorities (LPAs) have a duty to consult Natural England before granting planning permission on any development that is in or likely to affect a SSSI. The SSSI IRZs can be used by LPAs to consider whether a proposed development is likely to affect a SSSI and determine whether they will need to consult Natural England to seek advice on the nature of any potential SSSI impacts and how they might be avoided or mitigated. The SSSI IRZs are also used by developers and consultants to help them to consider whether a proposed development is likely to affect a SSSI and choose whether to seek pre-application advice from Natural England. This will allow any potential impacts to be taken into account within the planning application and so minimise the risk of delays at the formal planning stage.

There are a number of 'Development Categories' which are covered by the SSSI IRZs.

² MAGIC: www.magic.defra.gov.uk

Non-statutory designated wildlife areas

Non-statutory designated wildlife areas include Ancient Woodland, County Wildlife Sites (CWS) and Local Wildlife Sites (LWS).

Proximity to Biodiversity Action Plan Habitats

A 50m search web based search³ was undertaken to identify any Biodiversity Action Plan (BAP) habitats and those that the EA may consider a risk to the proposed permitting activity.

Location of waterbodies

Web based resources³ were also used to assess the site's proximity to watercourses; and waterbodies with respect to amphibians, particularly [REDACTED]

[REDACTED] utilise both aquatic and terrestrial habitat. Adults breed in waterbodies or 'ponds' during the spring and then emerge onto land, spending the summer resting, foraging and dispersing before hibernating through the winter. ***Under wildlife legislation, both suitable aquatic and suitable terrestrial habitat is protected.***

[REDACTED] have been found to move over considerable distances from their breeding ponds, however, the vast majority will inhabit an area much closer, and the exact distribution and [REDACTED] on land depend on a variety of factors. The quality of terrestrial habitat near to breeding ponds is important, as are the lack of barriers to dispersal (such as fast-flowing rivers, or very busy roads). Several studies have been conducted which reveal a great deal of variation, but [REDACTED] commonly move between ponds that are within **250m** of each other⁴.

Biological records – [REDACTED]

Biological records were sought from the the Kent Reptile & Amphibian Group (KRAG) with respect to [REDACTED] within the vicinity of the site.

Online records² were also searched for with respect to European Protected Species Mitigation Licences (EPSML) and licence returns within a 2km radius of the site¹.

³ Ordnance Survey Online Mapping, MAGIC and the Kent Landscape Information System (K-LIS).

⁴ English Nature, 2001: Great Crested Newt Mitigation Guidelines. Version: August 2001.

Walkover survey

A walkover survey was undertaken on 14th November, 2022 by Alison Short BSc (Hons) MCIEEM of behalf of Icen Ecology Ltd. to assess the site's potential to support terrestrial habitat for [REDACTED] and if present, whether this habitat is likely to be impacted by the proposals outlined in the revised EP application.

Limitations

There were no limitations.

RESULTS AND DISCUSSION

Desk study

Statutory designated areas

The desk study did not identify any statutory designated areas within 1km of the site. The closest statutory designated wildlife areas are just over 5km south-west: The Lydden & Temple Ewell Downs SAC and NNR.

The closest SSSI is the Sandwich Bay to Hacklinge Marshes SSSI, some 5.4km north-east. The site falls within the outer Impact Risk Zone (IRZ) of the above SSSI; this Zone is relevant to the following Development Categories:

SSSI Impact Risk Zones - to assess planning applications for likely impacts on SSSIs/SACs/SPAs & Ramsar sites (England)	
1. DOES PLANNING PROPOSAL FALL INTO ONE OR MORE OF THE CATEGORIES BELOW?	2. IF YES, CHECK THE CORRESPONDING DESCRIPTION(S) BELOW. LPA SHOULD CONSULT NATURAL ENGLAND ON LIKELY RISKS FROM THE FOLLOWING:
All Planning Applications	
Infrastructure	Airports, helipads and other aviation proposals.
Wind & Solar Energy	
Minerals, Oil & Gas	
Rural Non Residential	
Residential	Residential development of 500 units or more.
Rural Residential	Any residential development of 500 or more houses outside existing settlements/urban areas.
Air Pollution	Livestock & poultry units with floorspace > 500m ² , slurry lagoons & digestate stores > 4000m ² .
Combustion	General combustion processes >50MW energy input. Incl: energy from waste incineration, other incineration, landfill gas generation plant, pyrolysis/gasification, anaerobic digestion, sewage treatment works, other incineration/ combustion.
Waste	
Composting	
Discharges	Any discharge of water or liquid waste of more than 20m ³ /day to ground (ie to seep away) or to surface water, such as a beck or stream.
Water Supply	
Notes 1	For new residential development in this area financial contributions are required to mitigate increased recreational disturbance on coastal SPAs and Ramsar Sites. Check with Local Planning Authority.

The permitting operations are not listed, thus the application is unlikely to trigger consultation between the local planning authority and Natural England, although the final decision will rest with the local planning authority.

The closest ancient schedule monument is located 2km north-west: the rectangular earth work in Shingleton Wood.

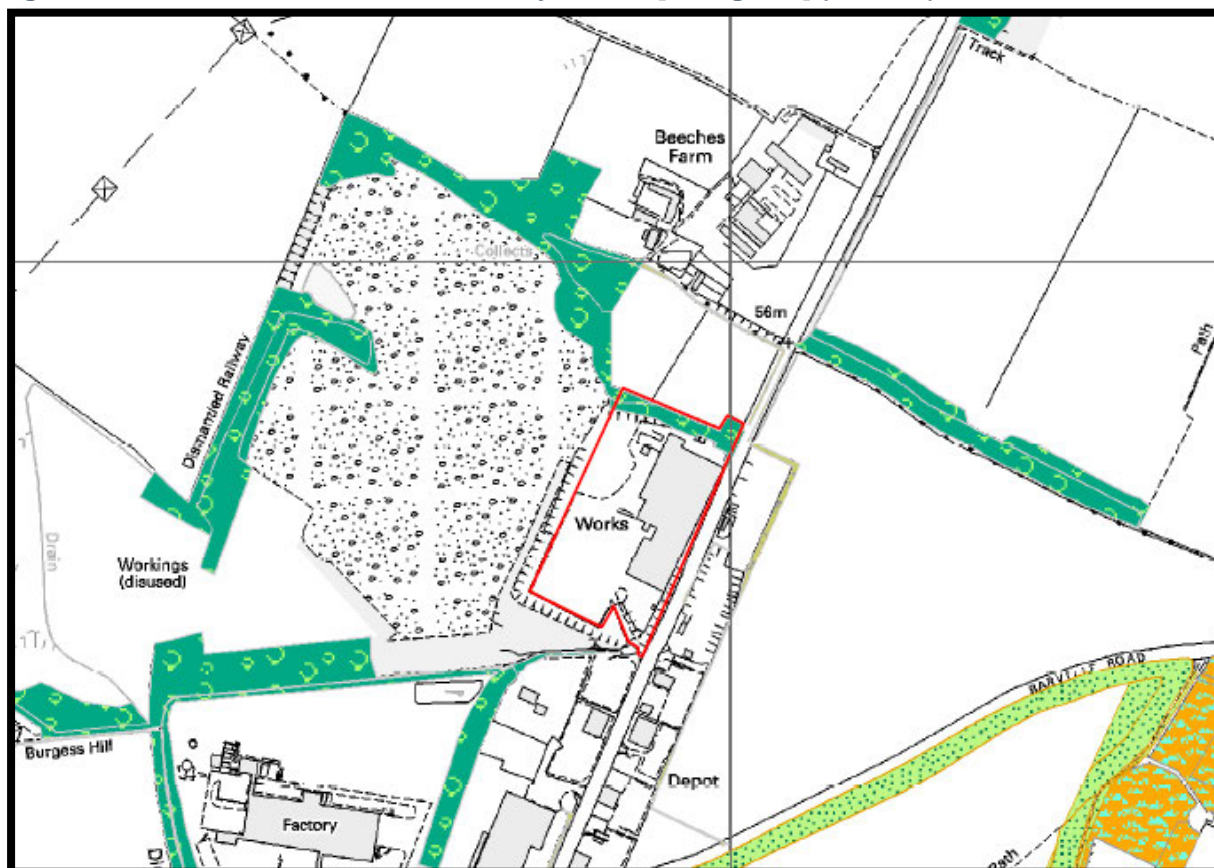
Non-statutory designated areas

Within 1km of the site, the Tilmanstone Colliery Tip Regionally Important Geological Site (RIGS) is adjacent west. Other areas within 1km are a plot of ancient-replanted woodland at 455m north-east and an ancient and semi-natural woodland (ASNW) at 510m north-east. The map is shown at Appendix A.

Proximity to Biodiversity Action Plan Habitats

The desk study results from KMBRC (see Appendix A for full map) identified 'Beech and Yew Woodland' BAP habitat along the northern section of the site redline boundary (Figure 4). This appears to be just outside the permitting boundaries (Figure 3).

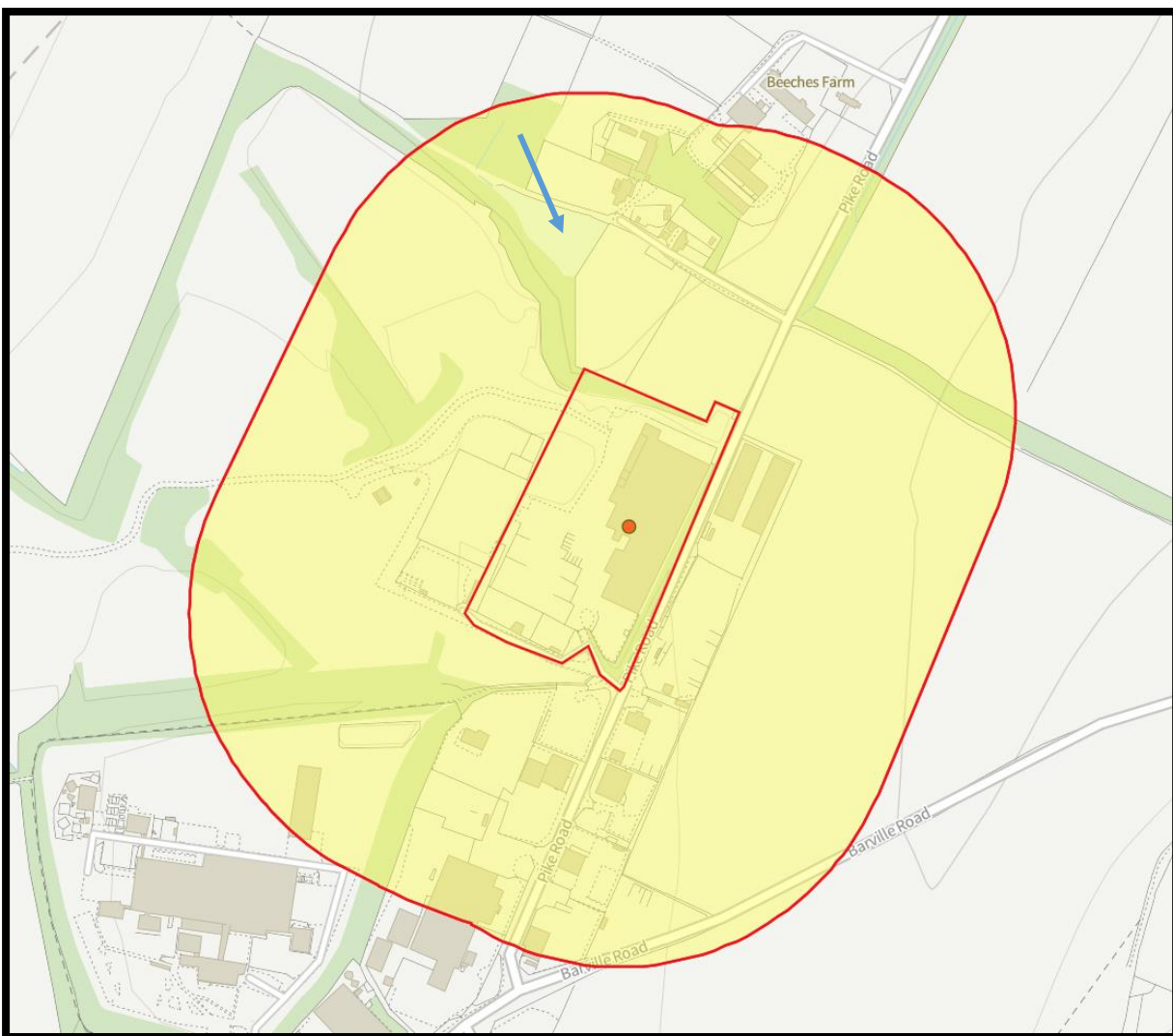
Figure 4: Beech and Yew Woodland Priority Habitat [dark green] (KMBRC).



Waterbodies within the vicinity of the site

Based upon online mapping there were no watercourses within 10m of the site. A single 'pond' was identified within 250m of the site; located approximately 85m north (Figure 5).

Figure 5: Ponds within 250m of the site.



Biological records – European protected species

There were no [REDACTED] identified from the MAGIC search within 2km of the site.

The KRAG data identified [REDACTED] records at ponds located 320m west and 420m north-west from 2011 and 2015, respectively (latest years) – see Figure 6.

Figure 6: KRAG [REDACTED] records: 320m west (blue marker) and 420m north-west (red marker).



Walkover survey

Habitats

The habitats on the site comprise mainly buildings, hardstanding and bare ground with some broadleaved vegetation to the north of the site. No further impacts on the vegetated areas will be anticipated by the EP changes.

Pond 85m north

The pond 85m north (identified within the desk study) was visited as part of the walkover survey. This pond no longer exists and has been fully encroached with scrub and grass, no water and thus unsuitable for [REDACTED].

Table 1: Site photographs.

	
<p>Bare ground. Photographer facing north-east towards trees.</p>	<p>Bare ground. Photographer facing south-east towards buildings.</p>
	
<p>North-west area of site (crushing of materials).</p>	<p>Parking and buildings on bare ground.</p>
	
<p>North-west perimeter of site. Bare ground with broadleaved trees on perimeter.</p>	<p>'Pond' 85m north identified in the desk study (now overgrown).</p>

PERMITTING SUMMARY

Table 2 below summaries the Ecological Appraisal findings with respect to the EP criteria set out in Rule 2.2.2 of the Standard Rules SR2010 No.12. for the existing and extended EP.

Table 2: Compliance with Rule 2.2.2 of the Standard Rules SR2010 No.12.

Rule 2.2.2. Activities shall not be carried out within:	Evaluation	Conclusion
(a) 500m of a European Site or SSSI.	<p>The closest statutory designated wildlife areas are just over 5km south-west: The Lydden & Temple Ewell Downs SAC and NNR.</p> <p>The closest SSSI is the Sandwich Bay to Hacklinge Marshes SSSI, some 5.4km north-east. The site falls within the outer IRZ of the above SSSI, however the permitting activities are not included in any of the corresponding Development Categories.</p>	Rule 2.2.2 (a) complied with.
(b) 10 metres of any watercourse.	There were no watercourses identified on or within 10m of the site.	Rule 2.2.2 (a) complied with.
NB: (c) to (e) are not concerned with ecology so have been omitted within this report.		
(f) 250 metres within the presence of [REDACTED].	<p>A single 'pond' was identified within 250m of the site; located approximately 85m north-west, however the walkover survey confirmed this no longer exists.</p> <p>There were no [REDACTED] EPSML identified within 2km of the site.</p> <p>KRAG data identified [REDACTED] records at ponds located 320m west and 420m north-west from 2011 and 2015, respectively (latest years).</p> <p>The on-site terrestrial habitats comprise hardstanding, buildings and some broadleaved woodland; the latter will remain unimpacted by the EP.</p>	Rule 2.2.2 (a) complied with.

Rule 2.2.2. Activities shall not be carried out within:	Evaluation	Conclusion
(g) 50 metres of a site that has species or habitats protected under the Biodiversity Action Plan that the Environment Agency considers at risk to this activity.	<p>BAP habitat of 'Beech and Yew Woodland' is located to the north of the site, just outside the EP areas.</p> <p>Although this is within 50m, no further adverse impacts are anticipated on this habitat over and above the current baseline and thus is not considered at risk.</p>	Rule 2.2.2 (a) complied with.
(h) 50 metres of a National Nature Reserve (NNR), Local Nature Reserves(LNR), Local Wildlife Site (LWS), Ancient woodland or Scheduled Ancient Monument.	There were no NNR, LNR, LWS, ancient woodland or schedule ancient monuments identified within 50m of the site.	Rule 2.2.2 (a) complied with.

APPENDIX A – KMBRC MAPPING

1. Designated Areas Map
2. Biodiversity Action Plan Areas Map

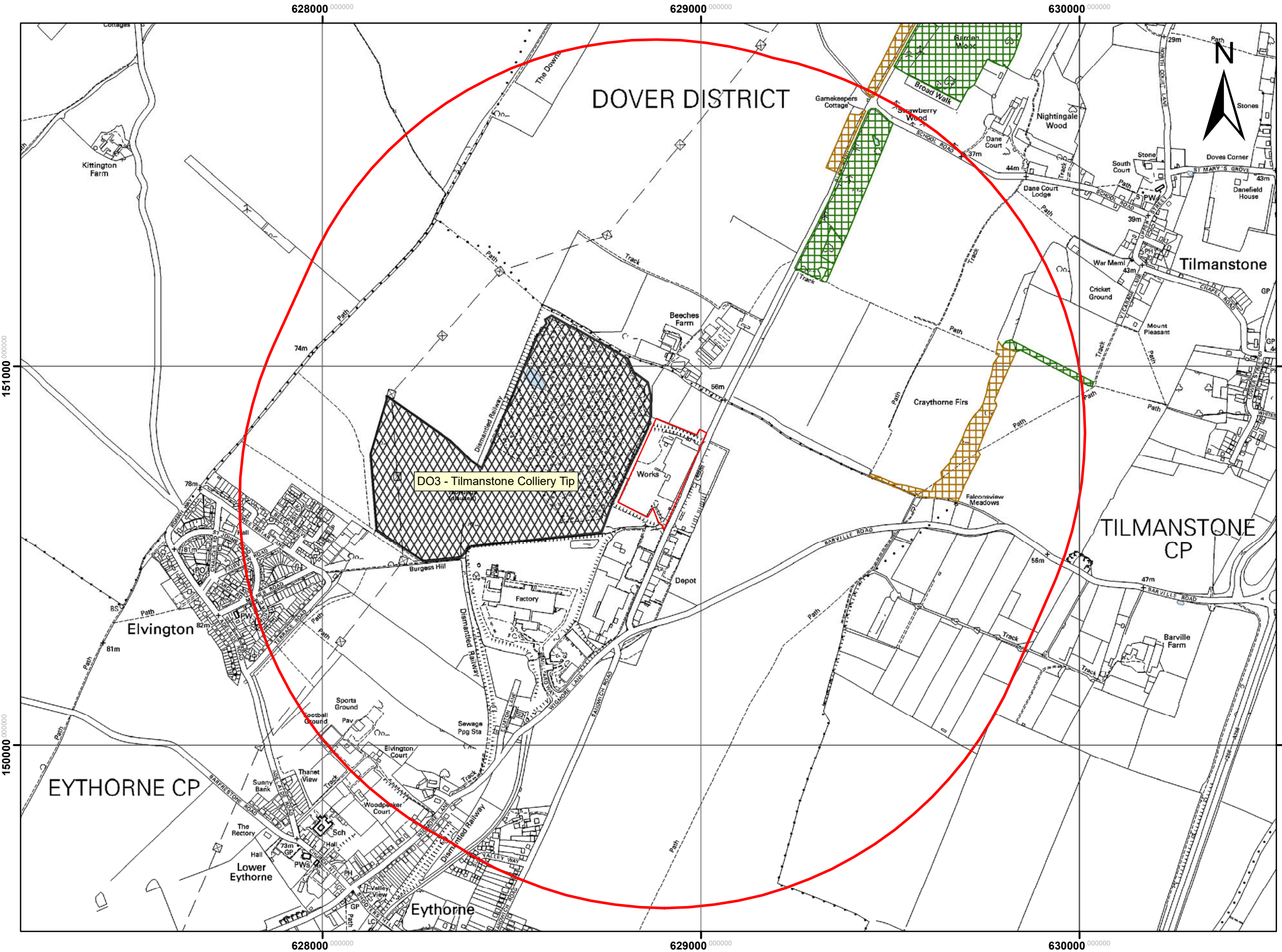
Kent & Medway Biological Records Centre

Map showing the statutory and non-statutory designated sites,
ancient woodland and water features at
Ovendens, Tilmanstone Works, Eythorne
Dru Hall, Icen Ecology Ltd
ENQ/22/499 24/11/2022







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Kent & Medway Biological Records Centre would like to acknowledge, where appropriate: Natural England for Ramsar, SAC, SPA, NNR, SSSI, AONB, Heritage Coast and Ancient Woodland data; Kent Wildlife Trust for LWS, RNR and Reserve data; GeoConservation Kent for RIGS data; The National Trust, The RSPB and The Woodland Trust for Reserve data; Kent County Council for Kent Habitat Survey 2012 data used in this map.

0 0.25 0.5 1 Kilometres



KEY

-  Study Area
-  Site Boundary
-  RIG Site
-  Ancient semi-natural woodland
-  Plantation on ancient woodland site
-  Water Feature

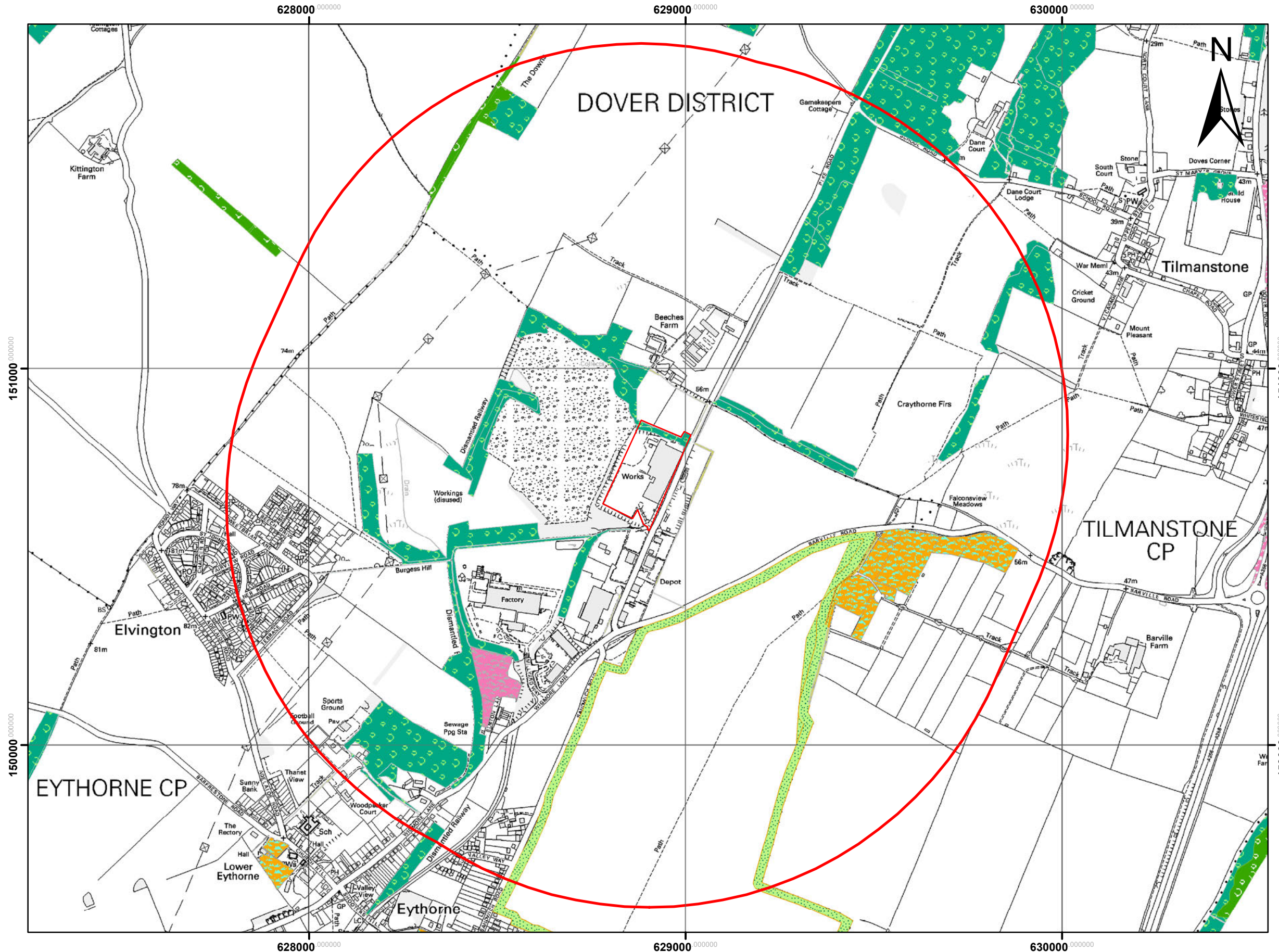
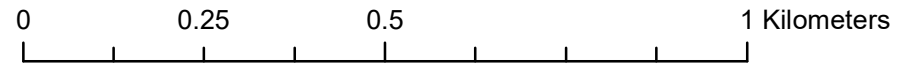


Kent & Medway Biological Records Centre

Map showing the BAP Priority habitats and other grasslands of importance recorded by the Kent Habitat Survey 2012 and Lowland mixed deciduous woodland from Natural England's Priority Habitat Inventory at Owendens, Tilmanstone Works, Eythorne, Dru Hall, Icen Ecology Ltd, ENQ/22/499 24/11/2022

KMBRC would like to acknowledge Natural England for the NE PHI data and Kent County Council and the Kent Habitat Survey 2012 for the habitat data used in this map. See www.archnature.eu/ for more information

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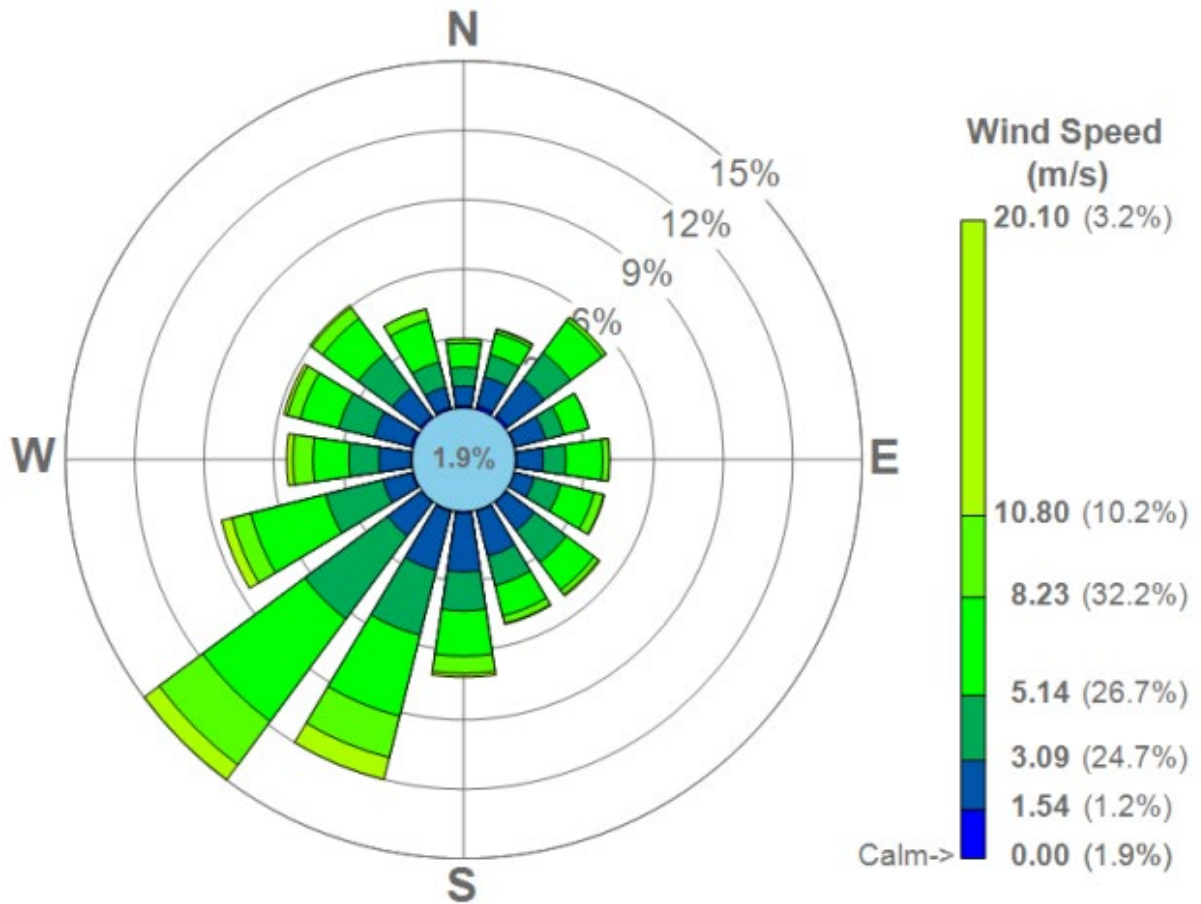


KEY

- Study Area
- Site Boundary
- Agriculture and improved grassland**
 - Arable field margin
- Calcareous grassland**
 - Lowland calcareous grassland;
- Woodland**
 - Scrub woodland & Hedgerows
 - Beech and yew woodland
- KHS 2012 Other grassland of importance**
 - Semi-improved lowland calcareous grassland
 - Semi-improved lowland meadow
- Natural England Priority Habitat Inventory**
 - Lowland mixed deciduous woodland



E. Manston Airport 2019 Wind Rose



Our vision

“Engineering a better environment for people and the planet”

Our mission

“To solve complex problems for the benefit of clients, communities and the climate”

Our values

People orientated

Individually and collectively, people are our business.
We strive to create environments for everyone to flourish and thrive.

Flexible

Pragmatic by nature and dedicated to getting the job done to the highest possible standard.

Professional

Operating at pace with integrity to deliver technical and robust solutions.

Environmentally aware

We understand our responsibility to the environment, it shapes our decision making and informs our practice.

Innovative

Our forensic questioning provides the ability to deliver appropriate innovations at every stage on every project.

Relationship focused

We value individuality and the benefits of working collaboratively to achieve positive outcomes for all.

