Environmental Risk Assessment

Prepared on Behalf of:

Concorde Metals Limited

Site Name:

CRABTREE MANORWAY NORTH

BELVEDERE

DA17 6AZ

Environmental Permit:

NP3226SX

DOCUMENT CONTROL SHEET

Site:	**Concorde Metals Limited**
Project:	**Bespoke Permit Variation Application**
Title	**Environmental Risk Assessment**
Issue	**1.0**
Date	**21.11.25**
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Distribution List:

Environment Agency

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1. Introduction

1.1.1 This Environmental Risk Assessment (RA) has been produced on behalf of Concorde Metals Limited (the applicant), in line with current Environment Agency guidance, 'Risk Assessment for your Environmental Permit' available on Gov.uk, to support an application for a new bespoke environmental permit for a Waste operation under the Environmental Permitting (England and Wales) Regulations 2016 (as amended).

1.1.2 Application Proposals:

- Convert the current Standard Rules Permit into a Bespoke Permit.
- Update the Permit to include the manual soring and separation (hand-held equipment only) and storage of WEEE Wastes as detailed below.
- Annual Tonnages are not proposed to be increased, but 1000 tonnes of the current 25,000 tonnes will be assigned to the management of WEEE Wastes.
- Update the lists of EWC Codes to reflect the changes proposed.

1.2 Environmental Risk Assessment Scope

1.2.1 This Environmental Risk Assessment has been produced in response to a request from the Environment Agency during the pre-application screening request in relation to the application.

1.3 Environmental Risk Assessment Aims

1.3.1 This assessment aims to consider potential environmental hazards associated with the activity, to identify sensitive receptors, which these may impact and determine the influence management practice has on reducing risk.

2. Site Setting

2.1 Location

2.1.1 The site is surrounded by commercial and industrial activities (North/East/South/West) that would not be deemed sensitive and the nearest residential dwellings is adjacent to the site (over 20 metres away) and Southwest of the site and over 455 metres away.

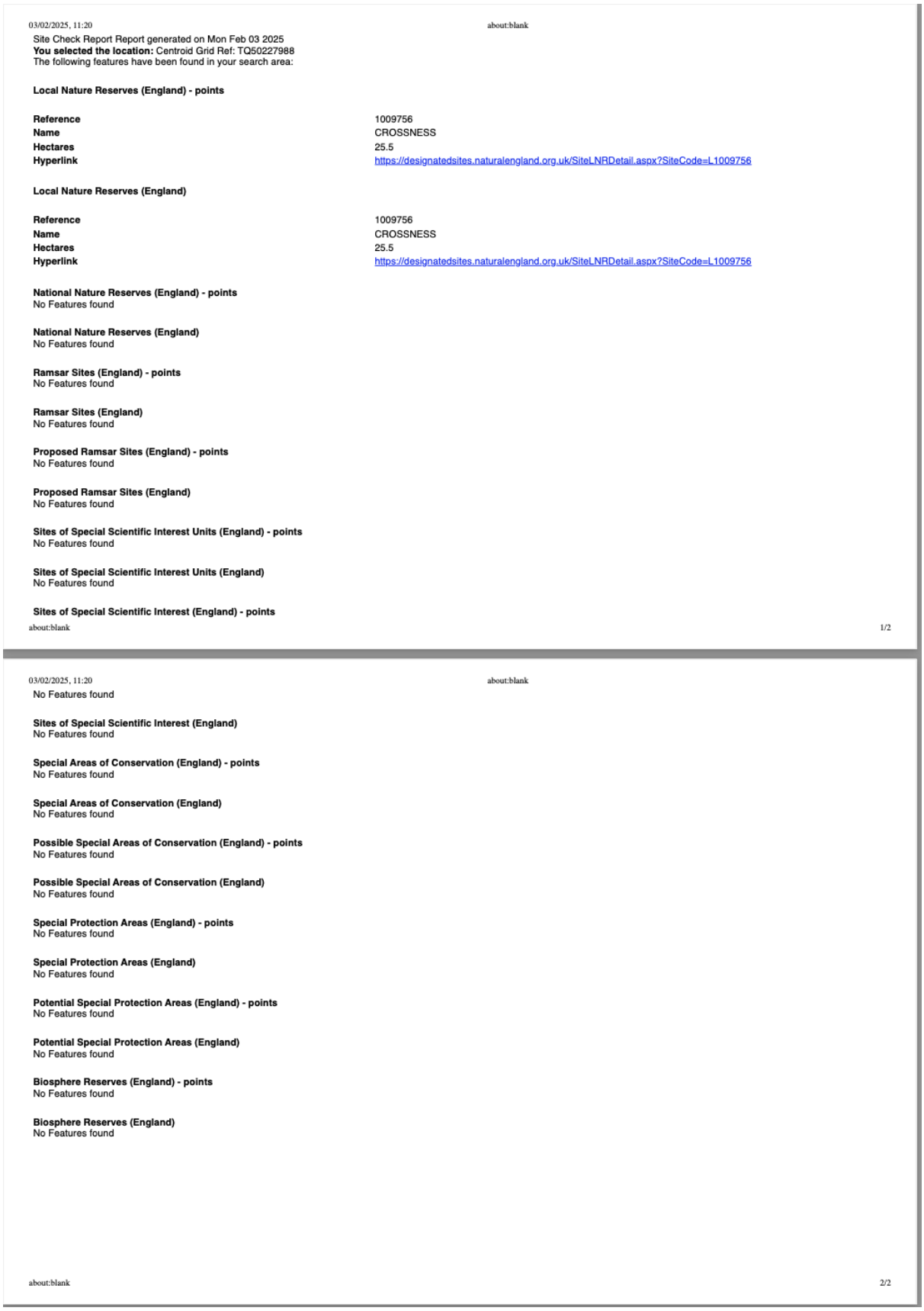
2.2 Designated Environmentally Sensitive Sites

2.2.1 There are no European Designated Sites such as Ramsar, SSSI's, Protection Areas, Biosphere Reserve, Special Areas of Conservations, but a Local Nature Reserve/Local Wildlife Site (Crossness) is located within 758 metres of the site as evidenced in Figures 1 & 2 below.

2.2.2 We have concluded that due to the substantial distance from the Local Nature Reserve/Local Wildlife Site the current and proposed operations will have no impact on this receptor and so no further assessments have been deemed necessary within this Risk Assessment Document.

2.2.3 Furthermore, the site is within any AQMA designation for NOX & PM10 as evidenced in Figure 3 overleaf.

Figure 1: Map Showing Proposed Application Site & 1000 Metre Screening Buffer (Magic Interactive Tool)



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Site Check Report Report generated on Mon Feb 03 2025
You selected the location: Centroid Grid Ref: TQ50227988
The following features have been found in your search area:

Local Nature Reserves (England) - points

Reference	1009756
Name	CROSSNESS
Hectares	25.5
Hyperlink	https://designatedsites.naturalengland.org.uk/SiteLNRDetail.aspx?SiteCode=L1009756

Local Nature Reserves (England)

Reference	1009756
Name	CROSSNESS
Hectares	25.5
Hyperlink	https://designatedsites.naturalengland.org.uk/SiteLNRDetail.aspx?SiteCode=L1009756

National Nature Reserves (England) - points
No Features found

National Nature Reserves (England)
No Features found

Ramsar Sites (England) - points
No Features found

Ramsar Sites (England)
No Features found

Proposed Ramsar Sites (England) - points
No Features found

Proposed Ramsar Sites (England)
No Features found

Sites of Special Scientific Interest Units (England) - points
No Features found

Sites of Special Scientific Interest Units (England)
No Features found

Sites of Special Scientific Interest (England) - points

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No Features found

Sites of Special Scientific Interest (England)
No Features found

Special Areas of Conservation (England) - points
No Features found

Special Areas of Conservation (England)
No Features found

Possible Special Areas of Conservation (England) - points
No Features found

Possible Special Areas of Conservation (England)
No Features found

Special Protection Areas (England) - points
No Features found

Special Protection Areas (England)
No Features found

Potential Special Protection Areas (England) - points
No Features found

Potential Special Protection Areas (England)
No Features found

Biosphere Reserves (England) - points
No Features found

Biosphere Reserves (England)
No Features found

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<u>Figure 2:</u> Screenshot of Site Check Report (Magic Interactive Tool)

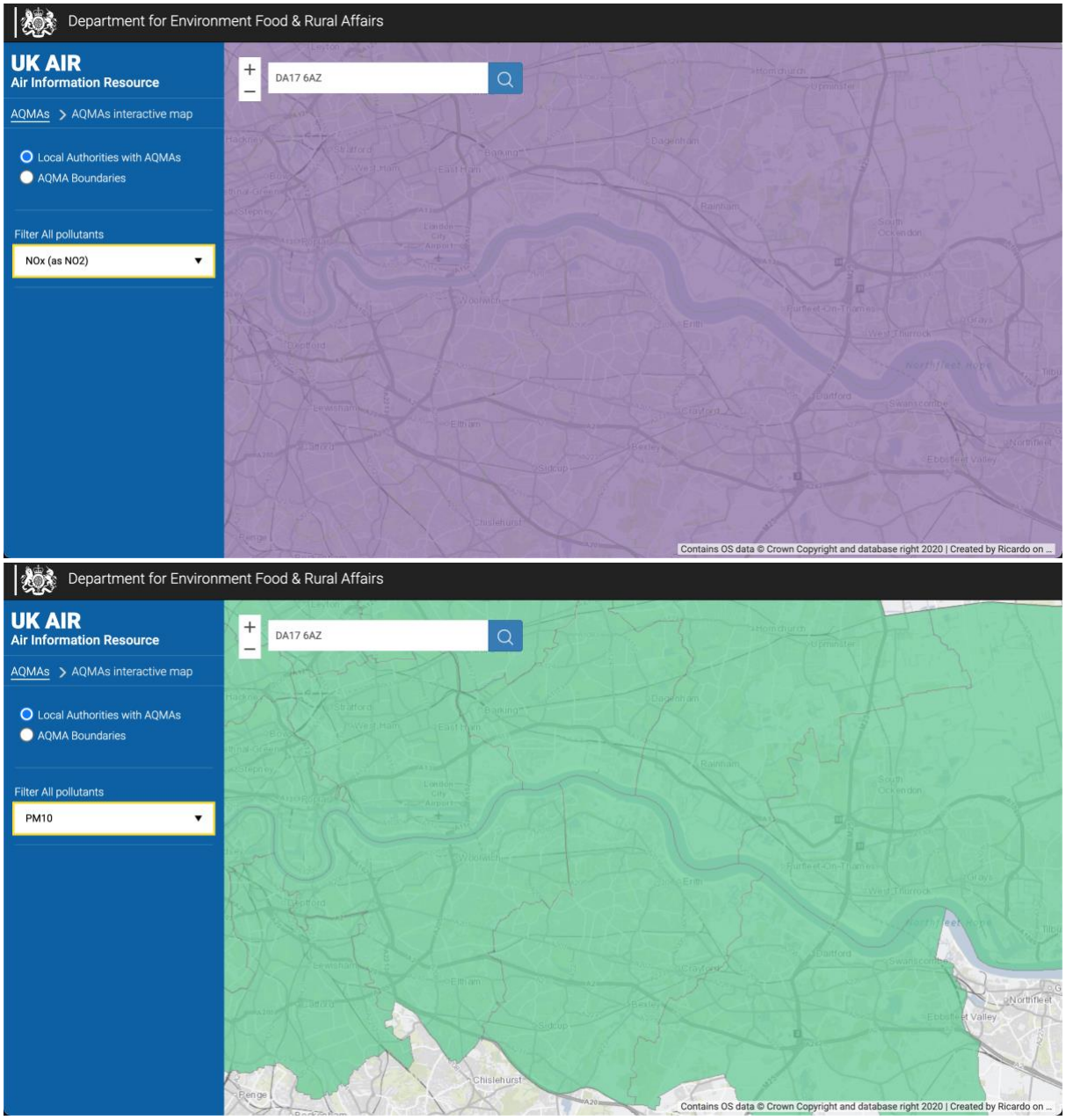

Figure 3: Application Site in Relation to Air Quality Management Designations.

2.3 Hydrogeology Aquifer Designation Map (Bedrock)

2.3.1 The application site falls with a Secondary A designation.

2.4 Hydrogeology Aquifer Designation Map (Superficial)

2.4.1 The application site falls within a Secondary (Undifferentiated) designation.

2.5 Groundwater Source Protection Zones

2.5.1 The site does not fall with a GPZ Designation.

2.6 Flood Risk

2.6.1 The site falls within a Flood Zone 3 designation (an area with a high probability of flooding).

3. Methodology

3.1 Hazard Identification

3.1.1 A hazard is something with potential to cause harm to something else.

3.2 Receptors

3.2.1 A receptor is the object (e.g., person, organism, resource or property) impacted by a hazard. When identifying receptors which may be at risk from the site, the following have ben considered:

- Deciduous Woodland;
- Priority Habitats;
- Locations used to grow food or to farm animals or fish;
- Drain and sewer system;
- Factories and other businesses;
- Fields and allotments used to grow food;
- Roads and railways;
- Groundwater beneath the site;
- Residential Dwellings;
- Regionally important geological sites;
- Schools, hospitals and other public buildings;
- Conservation and habitat protected areas;
- Water; and
- Playing fields and playgrounds.

3.2.2 Based on the assessment of the site setting presented in Section 2 of this Environmental Risk Assessment, the following principal receptors have been identified for assessment as presented in Figure 4 & detailed in Table 2 overleaf.

Table 1: Possible Receptors, Distance & Direction from Proposed Operation

Receptor Reference	Receptor Description	Direction From Site	Wind Directional Travel Percentage % (Overall Meteorological Office Figures)	Approximate Distance From Site Boundary (Metres)
1	Local Nature Reserve & Local Wildlife Site (Crossness)	North West	8.18	758
2	River Thames	East	5.98	686.3
3	Commercial & Industrial	South East	3.26	732.2
4	Commercial & Industrial	South East	3.26	367
5	Commercial & Industrial	East	5.98	322.6
6	Residential	North West	8.18	455
7	Commercial & Industrial	West	3.83	775.1
8	Road	West South West	4.32	273.9
9	Commercial & Industrial	North	10.32	132.10
10	Commercial & Industrial	North West	8.18	365
11	Residential	South	2.24	852.1
12	Commercial & Industrial	South West	4.22	536.1
13	Sikh Temple	South West	4.75	814.1
14	Bexley Railway Station/Rail Line	South West	4.75	921.5
15	Commercial & Industrial	South West	8.94	465.8
16	Commercial & Industrial	North	10.32	596.9
17	Commercial & Industrial	North West	8.18	903.7
18	Commercial & Industrial	West	3.83	173.9
19	Commercial & Industrial	South East	3.26	152.7
20	Residential	East	5.98	Adjacent

Figure 4: Possible Receptors Identified within 1000m of the Application Site (Magic)

3.3 Pathways

Table 2: Pathways

Receptor	Hazard	Pathway
Humans & Property	Odour	Transmitted through the air
	Dust and Particular Matter	Transmitted through the air
	Noise & Vibration	Transmitted through the air/ground
	Birds, Vermin & Insects	Physical travel
	Fire	Physical contact and spread
Groundwater	Contaminated Runoff	Infiltration through the ground
Surface Water	Contaminated Runoff	Direct discharge from site
Protected Conservation Sites	Dust and Particular Matter	Transmitted through the air
	Noise & Vibration	Transmitted through the air/ground.
	Fire	Physical contact and spread
Atmosphere	Dust and Particular Matter	Transmitted through the air

3.4 Risk

3.4.1 Assessment of risk is based on the probability of receptor exposure to the identified hazards and the consequence of exposure. The initial assessment of risk is made assuming no risk management practices with the proposed mitigation measures & management practices being factored into the overall assessment of the proposed operation resulting in a residual risk level.

4. Fugitive Emissions to Air

Hazard	Source	Pathway	Receptor	Probability of Exposure	Consequence	Magnitude of Risk	Risk Management	Residual Risk
Release of Particulate Matter (Dusts)	Dust from Delivery of Wastes	Air Transportation then inhalation	Local Human Population, Adjacent Industrial/ Commercial Activities Workforce & Sensitive Receptors as identified in Table 2 above.	Low	Low	Medium	Vehicles are sheeted during the transportation of all waste materials to the proposed site. See separately submitted Environmental Management System (Dust Emissions Management Procedures). Dust Suppression equipment utilised to limit dust emissions (as deemed necessary).	Very Low
	Dust from Deposit of Wastes	Air Transportation then inhalation	Local Human Population, Adjacent Industrial/ Commercial Activities Workforce & Sensitive Receptors as identified in Table 2 above.	Low	Low	Medium	Wastes are deposited within the building acting as physical barriers to the transmission of dusts. See separately submitted Environmental Management System (Dust Emissions Management Procedures). Dust Suppression equipment utilised to limit dust emissions (as deemed necessary).	Very Low
	Dust from Processing of Wastes	Air Transportation then inhalation	Local Human Population, Adjacent Industrial/ Commercial Activities Workforce &	Low	Low	Medium	Processing of materials conducted within the building acting as physical barriers to the transmission of dusts. See separately submitted Environmental Management System (Dust Emissions Management Procedures).	Very Low

			Sensitive Receptors as identified in Table 2 above.				Dust Suppression equipment utilised to limit dust emissions (as deemed necessary).	
	Dust from Storage of Waste	Air Transportation then inhalation	Local Human Population, Adjacent Industrial/ Commercial Activities Workforce & Sensitive Receptors as identified in Table 2 above.	Low	Low	Medium	Wastes stored within designated containers/bays/areas, which are within the building and skips/containers externally acting as physical barriers to the transmission of dusts. Ongoing monitoring of material stockpiles throughout the working day. See separately submitted Environmental Management System (Dust Emissions Management Procedures). Dust Suppression equipment utilised to limit dust emissions (as deemed necessary).	Very Low
	Dust from Loading of Wastes	Air Transportation then inhalation	Local Human Population, Adjacent Industrial/ Commercial Activities Workforce & Sensitive Receptors as identified in Table 2 above.	Low	Low	Medium	Materials are placed within removal vehicles and not dropped from a height. See separately submitted Environmental Management System (Dust Emissions Management Procedures). Dust Suppression equipment utilised to limit dust emissions (as deemed necessary).	Very Low
	Dust from Track Out	Air Transportation then inhalation	Local Human Population, Adjacent Industrial/	Low	Low	Medium	Surface cleaned/tidied on a regular basis to prevent the build up of particulates on the site surfacing. Vehicles wheels inspected and washed if	Very Low

			Commercial Activities Workforce & Sensitive Receptors as identified in Table 2 above.				dust is present. See separately submitted Environmental Management System.	
Release of Particulate Matter (Smoke & Particulates)	Smoke & Particulates from a Fire arising onsite.	Air Transportation then inhalation	Local Human Population, Adjacent Industrial/ Commercial Activities Workforce & Sensitive Receptors as identified in Table 2 above.	Low	Low	Medium	See separately submitted Fire Prevention Plan for onsite arrangements for the management of a fire onsite to prevent fires. See separately submitted Environmental Management System for onsite arrangements for the management of the site to ensure compliance with the Environmental Permit. Enclosed site perimeter & building. Wind conditions will be monitored & Operations may cease until conditions improve.	Low

5. Noise & Vibration

Hazard	Source	Pathway	Receptor	Probability of Exposure	Consequence	Magnitude of Risk	Risk Management	Residual Risk
Noise & Vibrations from Vehicle Movements & onsite activities	Noise from Site Operation	Noise through the air and vibration through the ground	Local Human Population, Adjacent Industrial/ Commercial Activities Workforce & Sensitive Receptors as identified in Table 2 above.	Low	Medium	Medium	No engine idling is permitted onsite; all engines are turned off whilst waiting to tip. Relevant plant and equipment will be fitted with appropriate sound attenuation and acoustic isolation and will be subject to regular inspection and maintenance schedules to maintain operational performance. Noise emissions are not considered to be a potential issue due to the nature of the operation. Any plant vibration issue will be resolved during the plant-commissioning period. See separately submitted Noise Emissions Management Plan. Operatives are trained in noise management and the prompt reporting of any abnormal noise so that it can be rectified.	Very Low
	Noise from Delivery of Wastes (i.e., Vehicle Movements)	Noise through the air and vibration through the ground	Local Human Population, Adjacent Industrial/ Commercial Activities Workforce & Sensitive	Low	Medium	Medium	All vehicles have silencing equipment fitted as standard, which are regularly serviced and have daily defect checks completed by drivers. Noise emissions are not considered to be a potential issue due to the nature of the operation.	Very Low

			Receptors as identified in Table 2 above.				As required by law, in order to hold an Operator's License, all vehicles undergo a safety inspection, including exhaust and silencer check, every 6 weeks (PMI). 10mph speed limit enforced onsite; anyone speeding will be subject to disciplinary action. No engine idling is permitted onsite; all engines are turned off whilst waiting to tip. Relevant plant and equipment will be fitted with appropriate sound attenuation and acoustic isolation and will be subject to regular inspection and maintenance schedules to maintain operational performance. Any plant vibration issue will be resolved during the plant-commissioning period. See separately submitted Noise Emissions Management Plan. Operatives are trained in noise management and the prompt reporting of any abnormal noise so that it can be rectified.	
	Noise from Deposit of Wastes	Noise through the air and vibration through the ground	Local Human Population, Adjacent Industrial/ Commercial Activities Workforce & Sensitive Receptors as	Low	Medium	Medium	All vehicles have silencing equipment fitted as standard, which are regularly serviced and have daily defect checks completed by drivers. Noise emissions are not considered to be a potential issue due to the isolated nature of the operation. As required by law, in order to hold an Operator's License, all vehicles undergo a	Very Low

			identified in Table 2 above.				safety inspection, including exhaust and silencer check, every 6 weeks (PMI). Vehicles are fitted with working exhaust silencing equipment. 10mph speed limit enforced onsite; anyone speeding will be subject to disciplinary action. All transport arrangements managed by the transport manager and only one vehicle will unload in an area at a time. The site perimeter benefits from an enclosed site perimeter acting as physical barriers and materials deposited within the building. No engine idling is permitted onsite; all engines are turned off whilst waiting to tip. Relevant plant and equipment will be fitted with appropriate sound attenuation and acoustic isolation and will be subject to regular inspection and maintenance schedules to maintain operational performance. Any plant vibration issue will be resolved during the plant-commissioning period. See separately submitted Noise Emissions Management Plan. Wind conditions will be monitored & Operations may cease until conditions improve. Operatives are trained in noise management and the prompt reporting of	

							any abnormal noise so that it can be rectified.	
	Noise from Processing of Wastes	Noise through the air and vibration through the ground	Local Human Population, Adjacent Industrial/ Commercial Activities Workforce & Sensitive Receptors as identified in Table 2 above.	Low	Medium	Medium	Processing of materials conducted within the building acting as a physical barrier to the transmission of noise. Noise emissions are not considered to be a potential issue due to the nature of the operation. All Equipment/Machinery have daily defect checks completed by operators, with all defects reported to senior management for rectification. Relevant plant and equipment will be fitted with appropriate sound attenuation and acoustic isolation and will be subject to regular inspection and maintenance schedules to maintain operational performance. Any plant vibration issue will be resolved during the plant-commissioning period. See separately submitted Noise Emissions Management Plan. Operatives are trained in noise management and the prompt reporting of any abnormal noise so that it can be rectified.	Very Low
	Noise from Loading of Wastes	Noise through the air and vibration	Local Human Population, Adjacent Industrial/ Commercial	Low	Medium	Medium	Noise emissions are not considered to be a potential issue due to the isolated nature of the operation.	Very Low

		through the ground	Activities Workforce & Sensitive Receptors as identified in Table 2 above.				Materials are placed within removal vehicles and not dropped from a height. Reducing the potential impact of noise & vibration. Revving of forklifts/bobcat engines when loading will be kept to a minimum. When not in use all operational equipment is switched off not left idling. See separately submitted Noise Emissions Management Plan. Operatives are trained in noise management and the prompt reporting of any abnormal noise so that it can be rectified.	

6. Odour

Hazard	Source	Pathway	Receptor	Probability of Exposure	Consequence	Magnitude of Risk	Risk Management	Residual Risk
Release of Particulate Matter (Odours)	Odour from Delivery of Wastes	Air Transportation then inhalation	Local Human Population, Adjacent Industrial/ Commercial Activities Workforce & Sensitive Receptors as identified in Table 2 above.	Medium	Medium	Medium	Odorous wastes are not accepted at the site and strict waste acceptance checks implemented. See separately submitted Environmental Management System (Odour Emissions Management Procedures).	Very Low
	Odour from Deposit of Wastes	Air Transportation then inhalation	Local Human Population, Adjacent Industrial/ Commercial Activities Workforce & Sensitive Receptors as identified in Table 2 above.	Medium	Medium	Medium	Odorous wastes are not accepted at the site and strict waste acceptance checks implemented. See separately submitted Environmental Management System (Odour Emissions Management Procedures).	Very Low
	Odour from Processing of Wastes	Air Transportation then inhalation	Local Human Population, Adjacent Industrial/ Commercial Activities Workforce & Sensitive Receptors as	Medium	Medium	Medium	No odorous wastes are processed at the site. See separately submitted Environmental Management System (Odour Emissions Management Procedures).	Very Low

			identified in Table 2 above.					
	Odour from Storage of Waste	Air Transportation then inhalation	Local Human Population, Adjacent Industrial/ Commercial Activities Workforce & Sensitive Receptors as identified in Table 2 above.	Medium	Medium	Medium	No odorous wastes stored at the site. See separately submitted Environmental Management System (Odour Emissions Management Procedures).	Very Low
	Odour from Loading of Wastes	Air Transportation then inhalation	Local Human Population, Adjacent Industrial/ Commercial Activities Workforce & Sensitive Receptors as identified in Table 2 above.	Medium	Medium	Medium	No odorous wastes loaded at the site. See separately submitted Environmental Management System (Odour Emissions Management Procedures).	Very Low

7. Litter

Hazard	Source	Pathway	Receptor	Probability of Exposure	Consequence	Magnitude of Risk	Risk Management	Residual Risk
Release of Litter	Litter Generated From Onsite Activities	Transport Through the Air & Over Land	Local Human Population, Adjacent Industrial/ Commercial Activities Workforce & Sensitive Receptors as identified in Table 2 above.	Low	Low	Low	The site will be carefully managed including good housekeeping procedures and regular checks will be made within and around the site for any litter/debris. Reaction time: Public highway immediately (within 1 hour of detection & within the permitted boundary by the end of the working day. Wastes are stored within designated containers/bays/areas around the site. Operatives are trained in Emissions Management Procedures. See separately submitted Environmental Management System Emissions Management Section Litter Procedures (Contingency Plan).	Low

8. Pests

Hazard	Source	Pathway	Receptor	Probability of Exposure	Consequence	Magnitude of Risk	Risk Management	Residual Risk
Pests (files, vermin, birds) attracted to waste material	Pests	Transport Through the Air & Over Land	Local Human Population, Adjacent Industrial/ Commercial Activities Workforce & Sensitive Receptors as identified in Table 2 above.	Low	Low	Low	Food waste prohibition notice. Wastes will be rejected if any loads appear to have pest infestations. The site will be carefully managed including good housekeeping procedures and regular checks will be made within and around the site for any litter/debris to prevent the attraction of pests. Wastes are stored within designated containers/bays/areas. Operatives are trained in Emissions Management Procedures. See separately submitted Environmental Management System Emissions Management Section Pests Procedures (Contingency Plan).	Very Low

9. Fugitive Emissions to Water

Hazard	Source	Pathway	Receptor	Probability of Exposure	Consequence	Magnitude of Risk	Risk Management	Residual Risk
Contaminated Surface Water Run Off/Fire Water Run Off	Contamination from Materials stored onsite	Percolation through soils, direct run off from site across the ground and entering surface water drains or natural channels/ ditches or groundwater	Local Human Population, Adjacent Industrial/ Commercial Activities Workforce & Sensitive Receptors as identified in Table 2 above.	Low	Medium	Medium	Senior Management inspects conditions of impermeable concrete surfacing regularly & any noticeable deterioration is rectified as soon as practicable. Impermeable concrete surface to drainage system. Regular inspections of equipment/machinery/vehicles will identify leaks at the earliest possible convenience. Fuels/oils stored in bunded areas with a capacity to hold 110% of the largest containers capacity. All wastes are stored on an impermeable surface with sealed drainage. See Fire Prevention Plan for the site's strategies in the event of a waste fire. Leakage/Spillage Procedure details in submitted Environmental Management System.	Low
Chemicals & Oils Stored Onsite	Loss of containment on site	Percolation through soils, direct run off from site across the ground and entering surface water drains or natural	Local Human Population, Adjacent Industrial/ Commercial Activities Workforce & Sensitive	Medium	Medium	Medium	Fuels/oils stored in bunded areas with a capacity to hold 110% of the largest containers capacity. Impermeable concrete surface to drainage system. Regular inspections of equipment/machinery/vehicles & the chemical	Low

		channels/ ditches or groundwater	Receptors as identified in Table 2 above.				storage areas will identify leaks at the earliest possible convenience. Impermeable concrete surface to drainage system.	
Leakage & Spillage	Loss of containment on site	Percolation through soils, direct run off from site across the ground and entering surface water drains or natural channels/ ditches or groundwater	Local Human Population, Adjacent Industrial/ Commercial Activities Workforce & Sensitive Receptors as identified in Table 2 above.	Medium	Medium	Medium	Regular inspections of equipment/machinery/vehicles will identify leaks at the earliest possible convenience. Leakage/Spillage Procedure details in submitted Environmental Management System. Impermeable concrete surface to drainage system.	Low

10. Conclusion

10.1.1 This Environmental Risk Assessment has been undertaken as described by the regulatory guidance. The assessment is provided as part of the application for a Bespoke Environmental Permit on behalf of Concorde Metals Limited.

10.1.2 This qualitative risk assessment has considered fugitive emissions, noise & vibration, odour, litter, pests, fugitive emissions to water & habitats. The assessment concludes that with the implementation of the risk management measures described above & those contained in supplementary Fire Prevention Plan, Noise Emissions Management Plan and the Environmental Management System Document the proposed Permit modification is not likely to cause a significant environmental impact, and no further assessment is required.

10.1.3 A Noise impact Assessment has been completed and this concludes that the site does not have an adverse impact on the surroundings receptors.