



AC
ENVIRONMENTAL
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Environmental Management System



McFen Plant Ltd
7C South Crescent
London
E16 4TL

February 2025

Ref: MCF.PT.EMS.2502

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CONTENTS

1. LOCATION	4
2. HISTORY	4
3. SITE DESIGN	4
3.1 Design	4
3.2 Vulnerable Locations	5
3.3 Drainage	6
3.4 Water, Gas and Electricity	6
3.5 Waste Handling	6
4. SITE OPERATIONS	8
4.1 Wastes	8
4.2 Retention Times	8
4.3 Waste Acceptance Procedures	8
4.4 Non-conforming Waste	9
4.5 Hazardous Waste	9
4.6 Weighing Facilities	9
4.7 Traffic Movement	Error! Bookmark not defined.
4.8 Operating Arrangements	9
4.9 Inspections and Maintenance	10
4.10 Site Tidiness	10
4.11 Site Security	10
4.12 Dust & Mud Control	11
4.13 Noise Management	11
4.14 Odour Control	12
4.15 Litter Control	12
4.16 Pest Control	12
5. CONTINGENCY PLANS	13
6. ACCIDENT PREVENTION AND MANAGEMENT PLAN	13
7. A CHANGING CLIMATE	13
8. PERSONNEL AND DUTIES	14
9. STAFF COMPETENCE AND TRAINING	14
10. RECORDS	14
11. SITE CONDITION REPORT	14
12. FIRE CONTROL AND PREVENTION PROVISIONS	18
13. COMPLAINTS	19
14. REVIEW OF THE SYSTEM	19

APPENDIX 1 – MANAGEMENT STRUCTURE.....	20
APPENDIX 2 – SITE LAYOUT REF: 231025MFP101	21
APPENDIX 3 – KEY RECEPTORS REF: 231025MFP103	22
APPENDIX 4 – SITE LOCATION PLAN REF: 231025MFP102	23
APPENDIX 5 – SDS DRAINAGE LAYOUT DRAWING REF: SDS 209174	24
APPENDIX 6 – CLIMATE CHANGE RISK ASSESSMENT	25

This Environmental Management System is for the McFen Plant Ltd site at 7C South Crescent, London, E16 4TL.

The Environmental Management System comprises this description of site operations and the Site Working Procedures Manual (Ref: SWPM Rev001). This Environmental Management System will refer to procedures undertaken on site.

1. LOCATION

The site is located at 7C South Crescent, London, E16 4TL, within the Cody Road industrial estate.

The site is immediately surrounded by commercial and industrial businesses to the north, east, south and west. Beyond that, 337m to the east of the site, on Star Lane, is the closest residential estate.

Reference to the DEFRA Air Quality Management Area (AQMA) interactive map indicates that this site is within an AQMA, declared in 2019 for Particulate Matter PM₁₀ and Nitrogen Dioxide NO₂. The site location can be seen in Appendix 4, Drawing Ref: 231025MFP102.

The site is located within a Flood Zone 1, indicating that it has a very low probability of experiencing a flood event.

2. HISTORY

Reference to ordinance survey maps indicates that the site consisted of open farmland in 1841. The 1955 OS map shows the land is still unused, but the neighbouring land now has industrial buildings on it, this is the case up to 1972. Further nearby industrial development took place to all surrounding boundaries, and by 2005 the current condition of the site is established. The site was first issued its permit in 2015. The site holds a standard rules permit - SR2008 No 3: 75kte – household, commercial and industrial waste transfer station with treatment – reference EPR/CB3704CL. There are no records/evidence of any pollution incidents on the site or near to the site.

3. SITE DESIGN

3.1 Design

The site layout is designed to ensure freedom of movement. The permitted area consists of an external yard and an industrial workshop building, the operational areas are surfaced with impermeable concrete and has a sealed drainage system draining via interceptor to a sewer.

The external yard contains vehicle storage areas, waste/product stockpiles and plant equipment storage. There are also two storey portacabins which house office and welfare facilities, including toilets and staff room / canteen. The site entrance is located to the west of the permitted area is bounded by 3m high palisade fencing with corrugated steel fixed to the outside, along the perimeter.

The industrial workshop building houses a workspace for the maintenance of plant and vehicles.

The proposal is for the external south-eastern area of the site to be used for the storage and treatment of wet waste that is generated from sweeper arisings. The location of this is shown in Appendix 2, Drawing Ref: 231025MFP101. Wastes come into the site via the company's own road sweepers, which are tipped in to a tipping bay, which is then fed into a dewatering system. This separates the liquid from the solids, with solids over 10mm to be separated and used as landfill material, and solids under 10mm, where possible, these would be recovered rather than disposed of, for re-use in the construction industry.

The central area of the site is kept free of wastes and materials and vehicles / equipment are stored in designated areas, away from stockpiles and plant.

Regarding waste storage, there is a 10cyd skip for general waste, 2 loose stockpiles which are the separate outputs from the dewatering system, and the storage of the aggregates outputs from the dewatering system will then be within the designated concrete bays on site. To maintain flexibility in operations, aggregates within the concrete bays may be stored in one of two ways: loose; or occasionally they might be stored in a 40 cyd skip within each bay.

3.2 Vulnerable Locations

There are a number of sensitive receptors within 1km of the site, the closest being the residential properties that are situated approximately 337m to the east of the site, on Star Lane. There are several schools within 1km of the site: the closest being Star Primary School, on Star Lane, located 373m to the east; Eastlea Community School on Pretoria Road to the east, being 548m distant; and Bow School to the west, being 698m distant.

There is also one medical centre located approximately 746m to the east. There are no additional sensitive receptors within 1km of the site.

Due to the distance of the site from the sensitive receptors, without mitigation, the site would be considered to present a risk of nuisance and pollution and so mitigative measures have been put in

place (please refer to Sections 4.11, 4.12, 4.13, 4.14 and 4.15 for further detail) to ensure that the nearby receptors are at very low risk of experiencing adverse impacts from the site. The site is surfaced with impermeable concrete or hardcore, has dust and mud control measures and pollution control measures in place to prevent pollution e.g. spill kits. In the event that sensitive receptors may be at risk, the trained operatives must do what it says in the accident management plan (see section 6), and do whatever else is necessary to minimise the environmental consequences, whilst at the same time, taking precautions to ensure the health and safety of employees and public is not compromised.

3.3 Drainage

The operational areas of the site are surfaced with impermeable concrete.

A drainage survey of the site was carried out by Survey Design Services in December 2023. The company produced a drainage layout plan based on the findings of the survey, see appendix 5, drawing no. SDS 209174.

The site has a comprehensive drainage system which includes surface water and foul water drainage. There is a washdown silt trap, located to the south-east of the yard, which is the designated water tipping point for the road sweepers. The site has an interceptor which is also located to the south-east of the yard. The interceptor will filter potential contaminated water from the site before being directed into the public sewer.

In any fire event, all water will be contained on site using sandbags and clay mats, to ensure that it doesn't enter the surface drains. Site management are responsible for immediately deploying the clay mats and sandbags. All site staff will be trained in the deployment of the clay mats and sandbags, and annual training exercises will be carried out.

Any spillages will be dealt with appropriately within the permitted area using the spill kit that is provided on site.

3.4 Water, Gas and Electricity

The water on site is supplied by Castle Water. The electricity on site is supplied by Scottish Power, and there is no gas on site.

3.5 Waste Handling

1.1.1. McFen Plant Ltd is seeking a variation to their environmental permit (reference EPR/CB3704CL) to obtain a bespoke permit. The existing permit stipulates that the processing and treatment of sweeper arisings must be conducted within a building, which cannot be achieved on site.

McFen Plant Ltd is therefore requesting permission to include sweeper arisings as one of the specified wastes that can be processed or treated outside of a building, and the addition of a washing plant to the activities. The EWC codes and the Recovery and Disposal codes sought for this permit variation do not differ from those in the existing permit.

The proposal is to handle waste in the form of road sweepings. The sweeper arisings are classed under the European Waste Catalogue (EWC) coding '20 03 03 street cleaning residues', an absolute non-hazardous waste.

As well as sweeper arisings, the site also proposes to accept soils and stones, under the code 17 05 04 soils and stones, derived from road subbase layers by vacuum excavation.

The site does not accept hazardous waste.

Processing includes the removal of excess water, screening and separating of the solids into; aggregate above 10mm and aggregates below 10mm. The location for the processing and storage of the waste is shown on Drawing Ref: 231025MFP101.

Tipping of loads will be supervised and visually monitored by a trained operative of McFen Plant. All wastes will be visually inspected prior to discharge, to ensure it complies with the waste description on the transfer note.

This will then be fed into a dewatering system, namely the CDE G:MAX, which is a dual stage wet recycling system. This system will be used to separate the liquid from the solids. Materials that enter the system are screened, rinsed, and separated.

This is done by feeding the material into a 31,000-litre settlement tank, which is then fed through to a second 19,000 litre settlement tank, which contains three baffle plates at varying heights, to allow water flow and to retain sediment. This will separate the solids into two categories:

1. Material over 10mm
2. Material under 10mm

Once the liquid has passed through the settlement tanks this will then feed into a 300-litre silt and oil separator. This contains a filter and high oil probe, which is alarmed. This will be inspected and maintained as per the manufacturer's guidance. Once the liquids have been through this system it will then be discharged into the foul sewer via a permitted connection and under McFen's Trade Effluent Licence (T.E. Case number: TBEC2CL1).

4. SITE OPERATIONS

4.1 Wastes

The range of wastes handled on site are described above in section 3.5. All the waste accepted at the site will be in accordance with the planning permission and Environmental Permit for the site.

Stockpile Number	Material Type / Stockpiles	Form	Location	Maximum Amount in each area (m3)
1	Aggregate >10mm	Loose	External Yard	Under 50m3
2	Aggregate <10mm	Loose	External Yard	Under 50m3
3	General Waste Skip	Loose	External Yard (10 yd Skip)	Under 50m3
4	Aggregate >10mm	Loose	Bay - External Yard	Under 300m3
5	Aggregate <10mm	Loose	Bay - External Yard	Under 300m3
6	Tipping bay	Loose	Bay - External Yard	Under 300m3

4.2 Retention Times

Waste stored within the permitted area does not include hazardous or flammable waste, therefore the site contains no higher risk material that needs to be processed promptly.

Wastes are typically processed within 7 days of receipt and may be stored for up to 6 months, depending upon the needs of the market.

4.3 Waste Acceptance Procedures

Waste reception and handling is subject to Site Working Procedures. As waste is received on site, it is inspected prior to offloading in accordance with SWP003. On arrival at the transfer facility, the driver must report to reception, or another appointed person, and the driver will be directed to the designated tipping area.

A visual check, to ensure the waste conforms to the assigned EWC code on the waste transfer note, and a check of the tipping area, to ensure that it is capable of accepting the discharge, is carried out prior to unloading. If it is safe to do so, the vehicle can be unloaded.

Any non-conforming materials found in the waste will be dealt with in accordance with the rejecting waste procedures Ref: SWP015.

Wastes are handled in accordance with various requirements of the planning permission, the Environmental Permit, and the requirements of the end market. These operations have been outlined above in Section 3.5.

4.4 Non-conforming Waste

Every load brought onto site will be inspected by an operator. Any loads that contain non-acceptable materials will be rejected in accordance with the rejecting waste procedure Ref: SWP015.

Non-conforming materials found after entering the site will be segregated immediately and stored under suitable conditions before being dispatched to a suitable permitted facility.

If the same waste stream is regularly found to contain non-conforming materials, then a review of the acceptance procedures will be undertaken. This involves a discussion with the waste producer to resolve the issue and prevent any further occurrences.

If it is necessary, non-conforming loads shall be reported to the appropriate authorities.

4.5 Hazardous Waste

There is no hazardous waste accepted on site.

4.6 Weighing Facilities

There are no weighing facilities on-site, therefore all inputs and outputs will be recorded, by recording the type and size of vehicle. For the purposes of reporting, as required by the permit, standard Environment Agency provided conversion factors will be used to create tonnages for waste returns. All tonnage records will be kept within the office.

4.7 Operating Arrangements

Vehicles and plant consisting of road sweepers which are used for daily site activities to deliver and unload the waste. The site uses their own vehicles only to collect and transport waste to site. McFen Plant Ltd will also use a 360 grab excavator, which will be used for moving waste piles around the site. Skip loader lorries will also be used for transporting waste off site.

Breakdown events will be dealt with in accordance with the Section 4.8 below "Inspections and Maintenance".

The company maintains a number of outlets for the various materials and is not tied contractually with any single outlet. In the event of problems at a downstream recycler or disposal point the company can switch to another outlet immediately.

In the unlikely event that all outlets were unavailable for a particular product / waste, then that product / waste would be stored on site until the limits for the particular product / waste type were

reached when the site would close to that product / waste until such time that the stockpiles could be reduced.

4.8 Inspections and Maintenance

The road sweepers will be used to transport waste to the site, and a 360 Grab Excavator will be used for moving waste piles around the site. Skip loader lorries will also be used for transporting waste off site. All vehicles are used for daily activities and are subject to a planned maintenance programme to minimise downtime and unplanned failures. Additionally, the dewatering system receives a 3 month preventative maintenance inspection from the manufacturer, CDE. A service planner is maintained to ensure that the required inspection and servicing is undertaken in a timely manner.

Daily site inspections are carried out by an authorised person and findings are recorded within the daily site inspection sheet. The Technically Competent Manager will carry out a weekly inspection of the site and the findings are recorded within the daily site inspection sheet. Issues will be reported to site management in a timely manner.

Any issues found will be dealt with promptly and within the timescales highlighted above. A review of site inspections shall take place at management meetings. Any trends identified will be discussed and action taken to address the issues.

4.9 Site Tidiness

The site will be inspected daily by the site manager and weekly by the COTC holder. Any accumulated litter, debris or dust will be removed. The site access and concrete hard standing will be swept as necessary by a manual sweeper. If potential visible accumulations of debris are identified transferring to the public highway, one of McFen Plant's mechanical sweepers will be used immediately to clean the highway.

Stockpiles will be maintained within the limits set out in the planning permission.

4.10 Site Security

The site has a comprehensive security system consisting of intruder alarms and CCTV.

The site has not experienced any trespass or vandalism. The security system consists of 21 No. CCTV cameras with motion sensors and receivers that operate 24 hours a day that were designed,

installed, and are maintained by a UKAS accredited installer, iC2 CCTV and Security Specialists (UK) Ltd. The system is monitored on site by site management during operational hours via a mobile application and sends alerts to site management by text if the system detects an intrusion.

4.11 Dust & Mud Control

All waste processing and storage on site has the potential to create dust. However, the contents of the road sweepers are solids which are mixed with water, and even after this has been through the de-watering plant, and the solids have been separated, the end product will still be wet. Only processed wastes which have become dry after prolonged storage could give rise to dust. Note, storage may be up to six months, as detailed in Section 4.2. There is a 50 litre water bowser onsite in the event that the material stockpiles pose a dust issue.

Any accumulations of dust on site will be removed by hand sweeping or by a mechanical sweeper.

Any dust issues will be dealt with in accordance with procedure SWP005 of the Site Working Procedures Manual.

In wet conditions, there is the potential for mud to be taken off-site and onto the highway. The site access road is approx. 67m long and the site will utilise one of their own mechanical road sweepers to prevent mud exiting site and staining the public highway. In addition, the site will operate in accordance with procedure SWP012 - Mud - Debris Control.

4.12 Noise Management

There are sensitive receptors within 1km of the site, the closest being the residential properties that are situated approximately 337m to the east of the site, which are off Manor Road.

The site is located within in a high noise environment with very many other industrial applications and a major road within a few metres of the site. However, the operations do have the potential to be considered to be noisy, and without mitigation have the potential to cause an issue beyond the site boundary. However, measures are taken to minimise noise generated by the permitted operations.

As a result, certain limitations have been implemented which restricts operations to set hours. Noise generated by permitted operations will be controlled and minimised.

The measures taken to minimise noise are:

- Creation of a planted bund on the eastern boundary to create a hard barrier between site operations and the nearest receptors.
- Only operate during working hours.
- When not in use, vehicles will be switched off.
- Noise complaints will be recorded and investigated immediately.

Any issues with noise will be dealt with in accordance with procedure SWP0011 of the Site Working Procedures Manual.

4.13 Odour Control

The nature of waste accepted on site means that odour is unlikely to become an issue. However, the following measures are put in place to minimise odours should they occur:

- Malodorous wastes are removed from the site for disposal at the earliest opportunity and transferred to a suitable permitted facility.
- Deodorising equipment will be used if required.

4.14 Litter Control

The wastes accepted on site are road sweepings from construction and demolition sites, and vacuum excavations from utility works, consisting of concrete, clays and soils which significantly reduces the risk of litter escaping the site.

In the event that litter does accumulate, it will be dealt with in accordance with procedure SWP009 of the Site Working Procedures Manual.

The measures taken to minimise litter are:

- Restricting the inputs of wastes which can lead to litter.
- Litter pick and inspection will be carried out daily by a designated member of staff on site.

4.15 Pest Control

Due to the waste types accepted on site, it is unlikely that pests will become an issue as they do not provide a suitable habitat for pests. However, if an issue does develop, the following measures will be taken:

- Use of commercial products.
- Use of a professional pest service.

If a waste is causing pest issues, then it will be removed from site immediately. This waste will not be accepted again until measures have been implemented to prevent pests.

Any evidence of pests will be dealt with in accordance with procedure SWP014 of the Site Working Procedures Manual.

5. CONTINGENCY PLANS

In the event of a fire at the site, all operations on site will cease. The site's entrance will be manned to ensure that no vehicles other than the Fire and Rescue Service or Environment Agency could gain access to the site. For the duration of the fire and the clean-up, no wastes will be accepted on site.

In the event of a flood, all operations on site will cease. No vehicles other than the Fire and Rescue Service or Environment Agency will gain access to the site, due to control of the site entrance by staff.

6. ACCIDENT PREVENTION AND MANAGEMENT PLAN

Please refer to document Ref: MCF.PT.AMP.2502 for the detailed plan. The Accident Prevention and Management Plan will be reviewed and updated annually, or after any incident.

7. A CHANGING CLIMATE

Climate change means that extreme weather incidents are becoming more common and more severe. Climate projections show that in the following decades we will face an increasing risk of climate change impacts, such as:

- Extreme rainfall, leading to more frequent and severe floods
- Heat waves
- Drought
- Rising sea levels and tidal waves
- Storms and flames

As a result of changing climate, a climate change risk assessment (Ref: MCF.PT.CCRA.2502) has been produced in order to illustrate the potential impacts and mitigation measures for the site. This is illustrated in Appendix 6.

8. PERSONNEL AND DUTIES

The site is operated by various personnel with designated duties and responsibilities. A management structure is shown in Appendix 1 attached to this Environmental Management System.

Technically competent management is available on site. A copy of the Primary Competence and Continuing Competence Certificates will be kept within the site office.

9. STAFF COMPETENCE AND TRAINING

Site management is responsible for ensuring that all operatives are appropriately trained in the moving, organising and storage of waste and any other activities that are carried out on site by the operatives. Training is carried out in the form of toolbox talks.

Operatives are responsible for carrying out all daily operations.

All training that is carried out on site will be recorded in either site folders, site diaries or on a computer spreadsheet. Training will be carried out annually and involves a refresher on all the relevant planning and permitting documents.

10. RECORDS

Maintenance, inspections, and all other related records, will be kept inside the site office in either folders, or on a spreadsheet on a computer.

11. SITE CONDITION REPORT

1.0 SITE DETAILS	
Name of the applicant	McFen Plant Ltd
Activity address	McFen Plant Ltd 7C South Crescent, London, E16 4TL
National grid reference	TQ 38841 82017
Document reference and dates for Site Condition Report at permit application and surrender	12 Site Condition Report

Document references for site plans (including location and boundaries)	231025MFP101 231025MFP102 231025MFP103
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2.0 Condition of the land at permit issue

Environmental setting including: <ul style="list-style-type: none"> • geology • hydrogeology • surface waters 	<p>The site is underlain by made ground according to the British Geological Survey Mapping.</p> <p>The nearest borehole shows that the ground is made up of ashes, clinker, brick rubble and gravel fill to a dept of 1.0m. Below this is firm to stiff grey slightly organic friable silty clay to a depth of 1.6m, which is underlain with firm grey-brown mottled silty clay with white specks which becomes soft with depth, to 2.8m. Beneath that is a layer of soft grey silty peaty clay with pieces of decomposed wood and shell traces to until the end of the borehole (3.3m).</p> <p>Other nearby boreholes show that the ground is made up of pale grey-brown silty sand chemical waste file to a depth of 1.1m. Below this is mid and dark brown sandy gravelly clay with coke, ash etc, fill, to a depth of 2.2m, which is underlain further with coke ash and slag until the end of the borehole (3.2m).</p> <p>Another nearby borehole shows that ground is made up of black ashes and brick rubble fill to a depth of 1.5m. Further below is soft to firm grey silty clay with peat, which is underlain by fine medium and coarse grey sand and gravel to a depth of 6.50m and stiff grey fissured silty clay with partings of fine brown sand until the end of the borehole (15m depth).</p> <p>The hydrogeology mapping illustrates that the site is located on an area of unproductive strata, and secondary undifferentiated aquifers, where there are variable characteristics of rock type. Groundwater vulnerability in this area is medium – low.</p> <p>A borehole record 215m away shows a well to 152m depth which is made up of clay, sand, to chalk bedrock.</p>
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<p>Pollution history including:</p> <ul style="list-style-type: none"> • pollution incidents that may have affected land • historical land-uses and associated contaminants • any visual/olfactory evidence of existing contamination • evidence of damage to pollution prevention measures 	<p>There are no Environment Agency recorded pollution incidents associated with the site that may have affected the land.</p> <p>The historical ordnance survey maps show the site to have been farmland in a predominantly rural area back in 1841. The surrounding area was increasingly industrialised after 1955 and the site was eventually designated for industrial use in the early 21st century. Previous use of the site is considered unlikely to have caused any contamination.</p> <p>There are no records/evidence of any pollution incidents on the site or near to the site.</p> <p>Drainage is in place and will be connected to an interceptor. Containment systems are also in place should a fire occur, including sandbags and clay mats. Therefore, during any fire event there will be no pollution to soils, surface water or groundwater.</p>
Evidence of historic contamination, for example, historical site investigation, assessment, remediation and verification reports (where available)	No previous historical site investigation data or reports are available.

Baseline soil and groundwater reference data	Not Applicable
Supporting information	N/A

3.0 Permitted activities	
Permitted activities	As per Environmental Permit: Permit for Waste Transfer station
Non-permitted activities undertaken	Business Administration
<p>Document references for:</p> <ul style="list-style-type: none"> • plan showing activity layout; and • environmental risk assessment. 	<p>231025MFP101 MCF.PT.ERA.2502</p>

4.0 Changes to the activity

Have there been any changes to the activity boundary?	No
Have there been any changes to the permitted activities?	No
Have any 'dangerous substances' not identified in the Application Site Condition Report been used or produced as a result of the permitted activities?	No
Checklist of supporting information	<ul style="list-style-type: none"> • Not Applicable

5.0 Measures taken to protect land

Pollution prevention measures have been carried out and are in place at the site. There are drains on site which are connected to an interceptor, which means during a fire event or leakage/spillage incident no substances will enter groundwater.

All waste accepted on site consists of construction and demolition waste, and excavated waste from street and utility works. Waste will be stored on a concrete surface. The area outside of the permitted area will be blocked off using sandbags during any potential pollution event, therefore, no pollution pathways to soil or surface and groundwater exist. Clay mats will also be placed over the surface gulley pots to contain contaminated water. There are 2m high concrete legio block walls to contain the wastes during storage. The perimeter of the site is formed of 3m high palisade fencing.

Checklist of supporting information	<ul style="list-style-type: none"> • Inspection records and summary of findings of inspections for all pollution prevention measures • Records of maintenance, repair and replacement of pollution prevention measures
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6.0 Pollution incidents that may have had an impact on land, and their remediation

There has been no evidence of any pollution incidents or spillages.

Checklist of supporting information	<ul style="list-style-type: none"> • Not Applicable
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7.0 Soil gas and water quality monitoring (where undertaken)

No wastes have been deposited onto any surface other than the concrete surface. No soil or gas monitoring is therefore considered necessary, as no pollution pathways exist to soils.

No spillages or pollution incidents have occurred and so no pollution pathways exist to surface or groundwater. Therefore, no water quality motoring is considered necessary.

Checklist of supporting information	<ul style="list-style-type: none"> Not Applicable
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8.0 Decommissioning and removal of pollution risk

Not applicable

Checklist of supporting information	<ul style="list-style-type: none"> None
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9.0 Reference data and remediation (where relevant)

No land or groundwater data was needed to be collected. The information from section 3, 4, 5 and 6 of the Site Condition Report show that the land is in a satisfactory condition and has not deteriorated.

Checklist of supporting information	<ul style="list-style-type: none"> None
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10.0 Statement of site condition

The permitted activities are to be carried out at this location. All pollution risks have been mitigated with no reported evidence or incidents of pollution or spillages. The land is deemed to be in a satisfactory condition.

12. FIRE CONTROL AND PREVENTION PROVISIONS

Mains water is available on site. A fire hydrant is available, just 14.5m from the site entrance, which can be used for firefighting purposes.

Fire extinguishers have been supplied to the company and are available throughout the site.

Fire prevention will be practiced by the site operating through good housekeeping in compliance with the permit.

13. COMPLAINTS

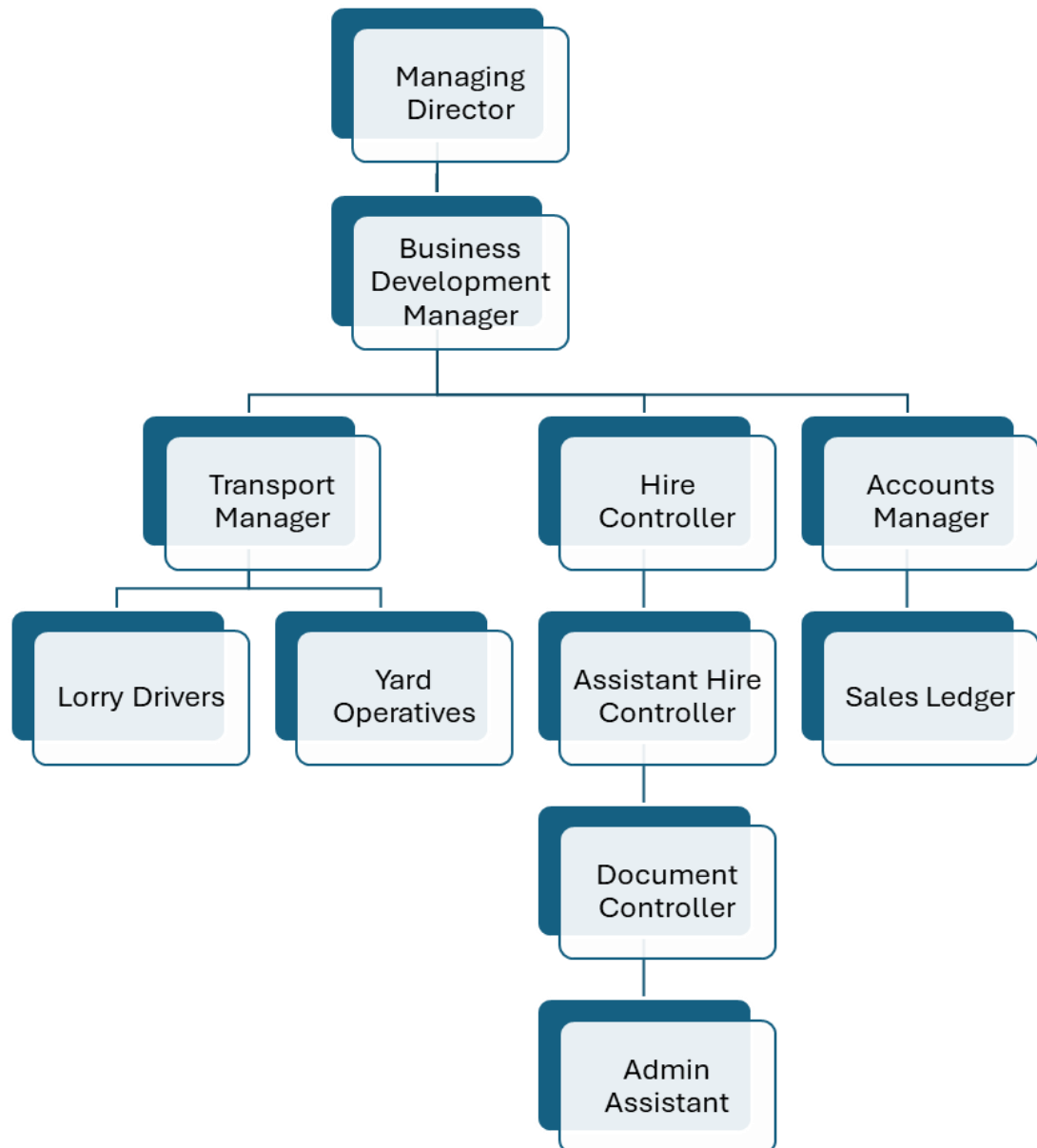
Any complaints received shall be dealt with in accordance with the procedure SWP002 Complaints Procedure of the Site Working Procedures Manual.

14. REVIEW OF THE SYSTEM

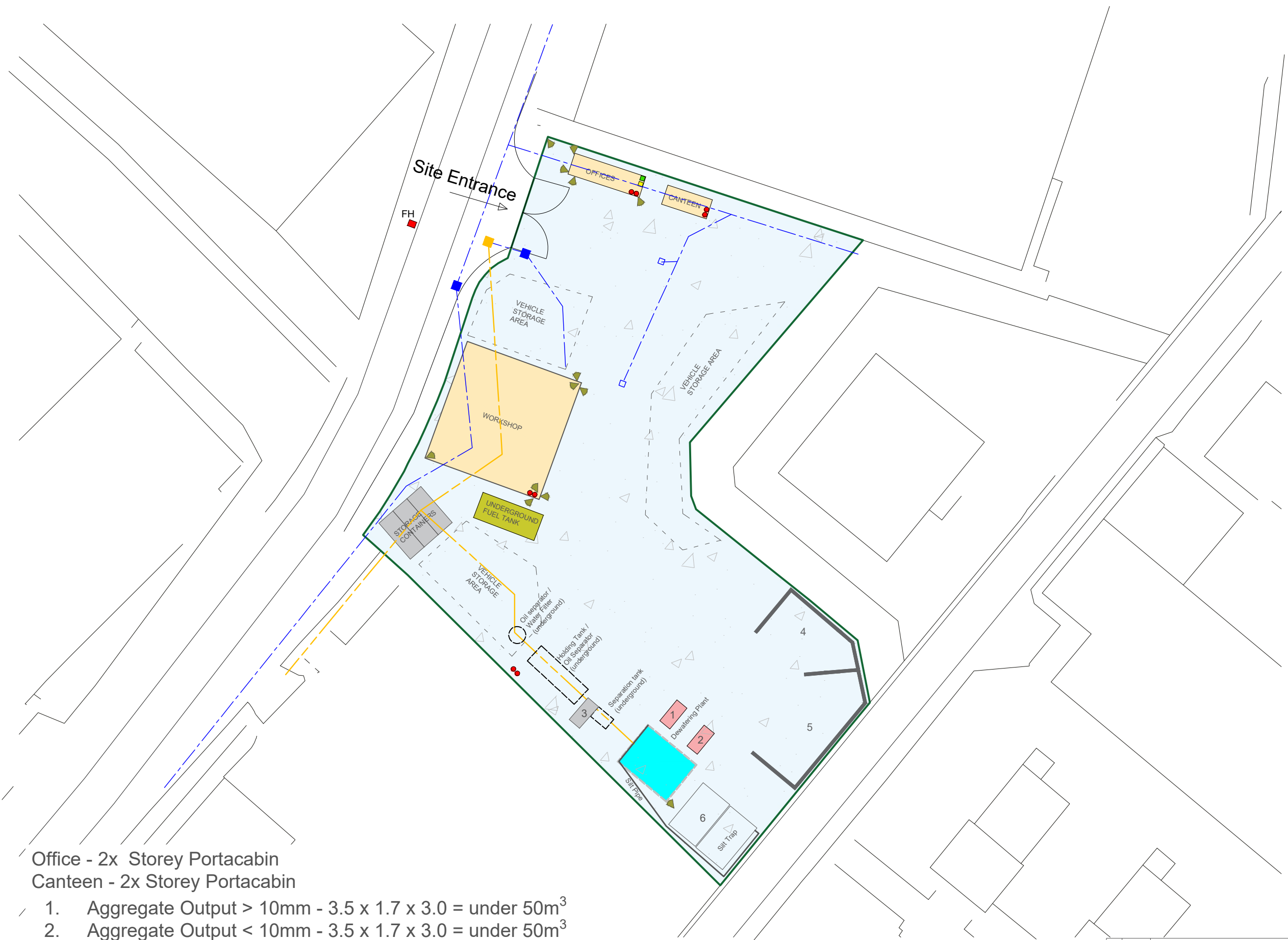
A review of the Environmental Management System shall take place in response to any incidents or accidents and annually on or around the anniversary of the system. The review shall be carried out by site management and the findings recorded. Any defects, shortfalls, or changes to the system shall be recorded and the system amended accordingly.

At each review, staff will receive training in the form of toolbox talks to highlight any changes.

APPENDIX 1 – MANAGEMENT STRUCTURE



APPENDIX 2 – SITE LAYOUT REF: 231025MFP101

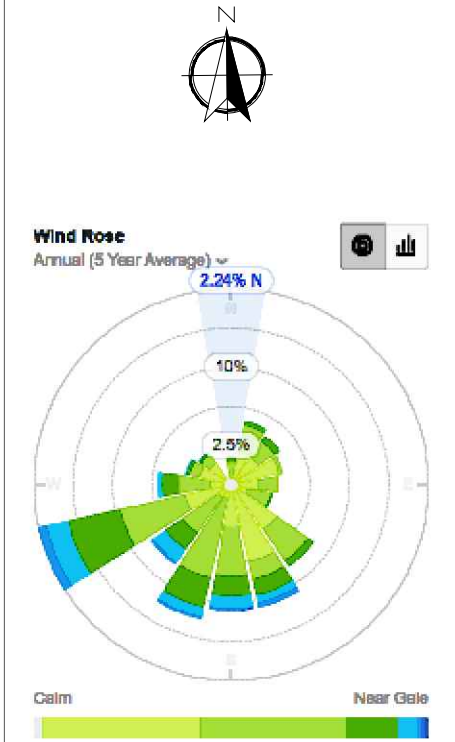













Office - 2x Storey Portacabin
Canteen - 2x Storey Portacabin

- 1. Aggregate Output > 10mm - 3.5 x 1.7 x 3.0 = under 50m³
- 2. Aggregate Output < 10mm - 3.5 x 1.7 x 3.0 = under 50m³
- 3. 10yd Skip for General Waste = under 50m³
- 4. Stock Pile - Aggregates > 10mm - approx 13.0 x 7.0 x 2.0 = under 300m³
- 5. Stock Pile - Aggregates < 10mm - approx 16.0 x 7.0 x 2.0 = under 300m³
- 6. Tipping Bay - 8.0 x 4.5 x 3.0 = under 300m³



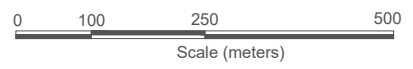
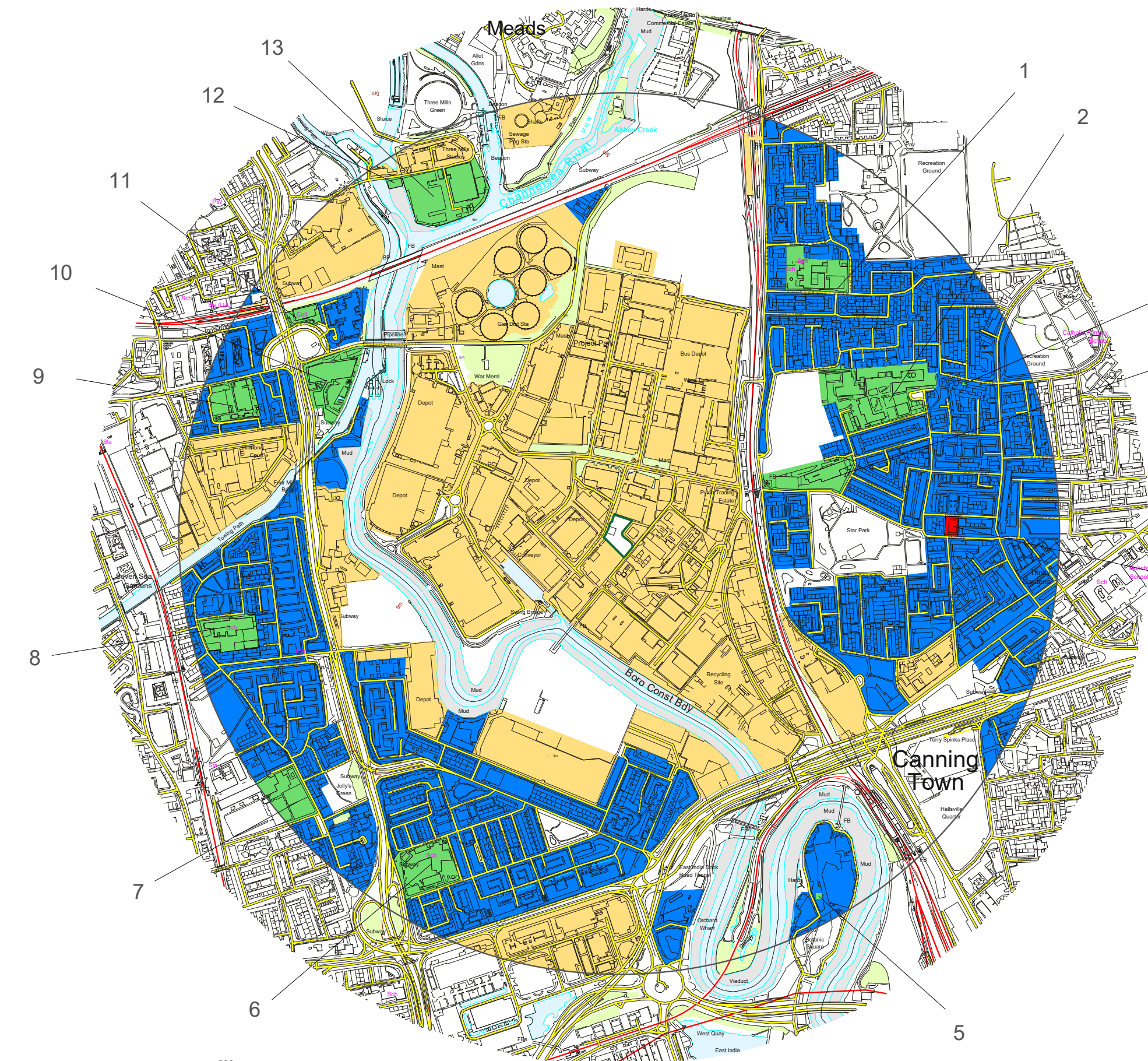
AC ENVIRONMENTAL
Environment House
Werrington Road
Stoke-on-Trent
ST2 9AF



-  Foul Water Manhole
-  Surface Water Manhole
-  Surface Grid
-  Surface Water Drainage
-  Foul Water Drainage
-  Fire Extinguisher
-  PPE storage
-  Spill Kit
-  CCTV Camera
-  Covered Area
-  Concrete Surface

CLIENT			
McFen Plant Ltd			
SITE			
Cody Road Business Centre, 7c South Cres, London E16 4TL			
PROJECT			
Environmental Management System			
TITLE			
Site Layout Plan			
SCALE @A3	DATE	DRAWN BY	CHECKED BY
1:500	Sep 2024	T Kearns	D Alcock
DRAWING NO		REVISION	
231025MFP101			
REV	DATE	DETAIL	

APPENDIX 3 – KEY RECEPTORS REF: 231025MFP103



EDUCATIONAL

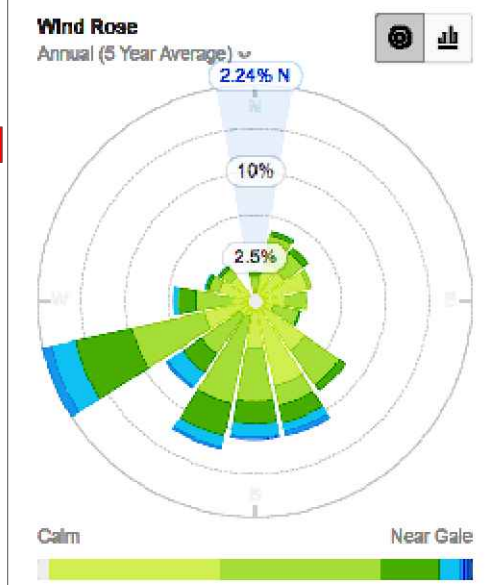
1. Gainborough Primary
2. Eastlea Community School
3. Kimberley Road Nursery
4. Star Primary School
5. Docklands Village Nursery for babies
6. Culloden Primary Academy
7. Langdon Park School
8. Manorfield Primary School
9. Marner Primary School
10. Bow School
11. East London Art and Music College
12. Harris Science Academy east
13. International School of Screen Acting College

MEDICAL

- A. Star Lane Medical Centre



Environment House
Werrington Road
Stoke-on-Trent
ST2 9AF

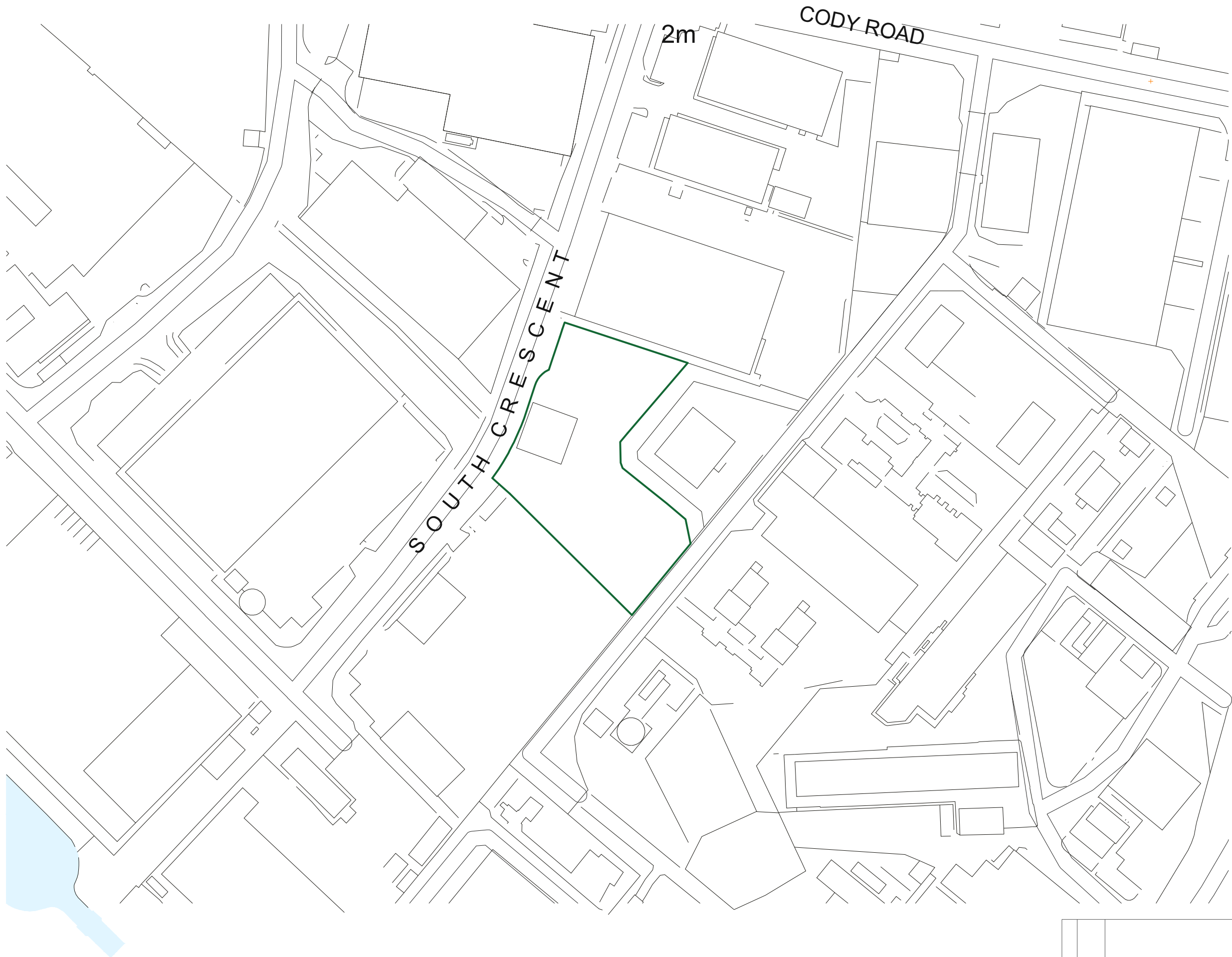


- Residential
- Commercial / Industrial
- Educational
- Medical
- Road
- Rail

CLIENT			
McFen Plant Ltd			
SITE			
Cody Road Business Centre, 7c South Cres, London E16 4TL			
PROJECT			
PERMIT APPLICATION			
TITLE			
KEY RECEPTOR PLAN			
SCALE @A3	DATE	DRAWN BY	CHECKED BY
1:10000	Oct 2023	T Kearns	D Alcock
DRAWING NO		REVISION	
231025MFP103			

REV	DATE	DETAIL

APPENDIX 4 – SITE LOCATION PLAN REF: 231025MFP102

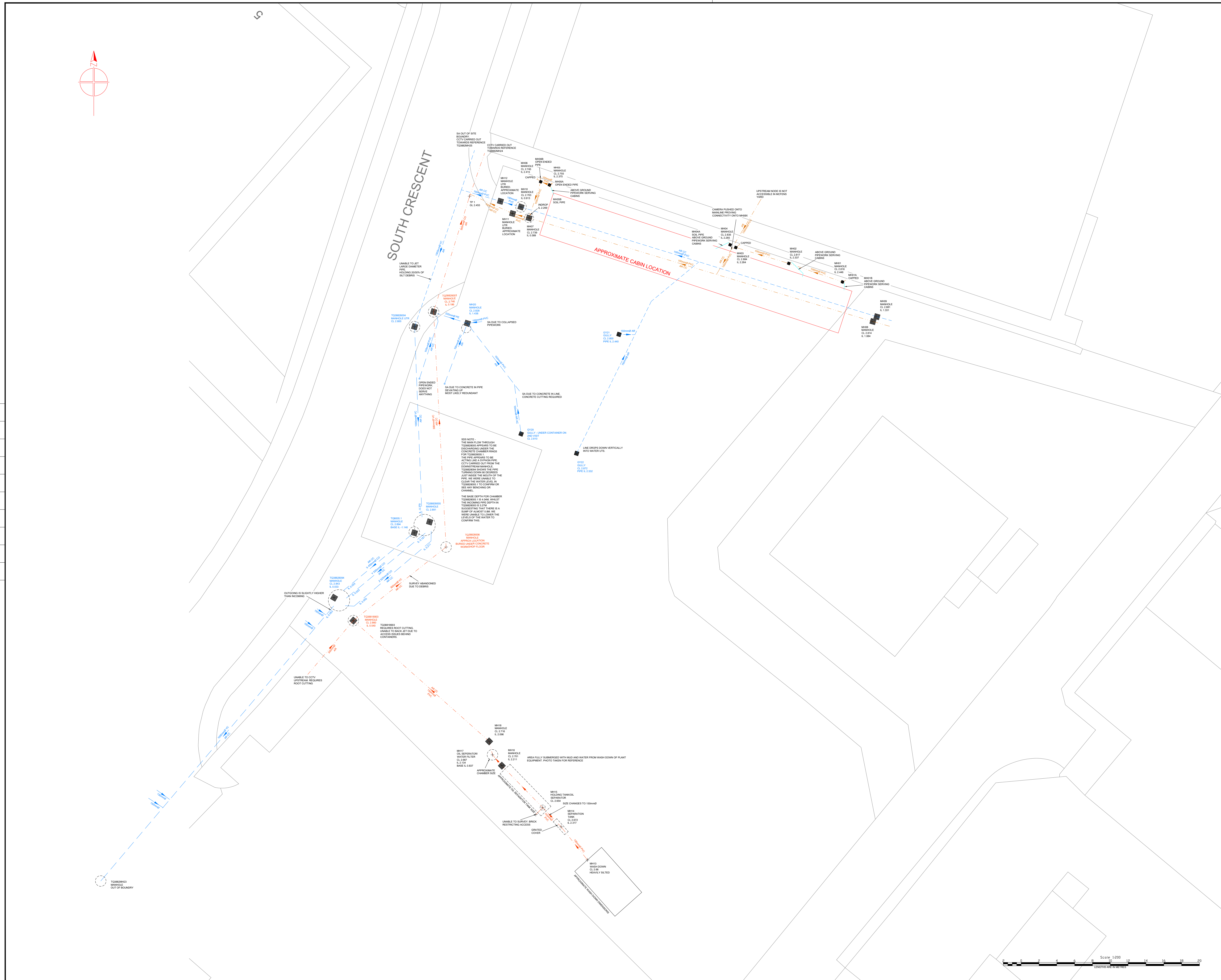


CLIENT			
McFen Plant Ltd			
SITE			
Cody Road Business Centre, 7c South Cres, London E16 4TL			
PROJECT			
Permit Application			
TITLE			
Site Location Plan			
SCALE @A3	DATE	DRAWN BY	CHECKED BY
1:1250	Oct 2023	T Kearns	D Alcock
DRAWING NO		REVISION	
231025MFP102			



REV	DATE	DETAIL

APPENDIX 5 – SDS DRAINAGE LAYOUT DRAWING REF: SDS 209174



TOPOGRAPHICAL SURVEY LEGEND

GENERAL

AV	AIR VALVE	LH	LAMP HOLE
BB	BOLISHA BEACON	LP	LAMP POST
Bdy	BOUNDARY	MK	MARKER POST
BH	BORHOLE	MS	MILE STONE
BL	BED LEVEL	NB	NOTICE BOARD
BO	BOLLARD	NP	NAME-PLATE
BS	BUS STOP	OSBM	ORDNANCE SURVEY BENCH MARK
BKW	BRICK WALL	OH	OVERHEAD
CATV	CABLE TELEVISION	PE	PENSTOCK
CG	CATTLE GRID	PM	PARKING METER
CH	CHANNEL LEVEL	PO	POST
Conc	CONCRETE	RB	RUBBISH BIN
Corr	CORRUGATED	RS	ROAD SIGN
CO	COPING LEVEL	RTW	RETAINING WALL
CPS	CONC. PAVING SLABS	RWP	RAIN WATER PIPE
CR	CROWN LEVEL	SAP	SAPLING
CUL	CULVERT	SC	STOP COCK
DK	DROP KERB	SL	SOFTIT LEVEL
DP	DOWN PIPE	SV	SOIL VENT PIPE
EB	ELECTRICITY BOX	SP	SIGN POST
EC	ELECTRICITY CABLE	STN	SURVEY STATION
EMH	ELECTRICITY MANHOLE	SV	STOP VALVE
EP	ELECTRICITY POLE	SW	SURFACE WATER
EPY	ELECTRICITY Pylon	TB	TREE BOLE
ER	EARTHING ROD	TBM	TEMPORARY BENCH MARK
FI	FIRE HYDRANT	TCB	TELEPHONE CALL BOX
FLR	FLOOR LEVEL	TH	THRESHOLD
FM	FLOW METER	TL	TRAFFIC LIGHT
FB	FLOW BED	TMH	TELEPHONE MANHOLE
FW	FOWL WATER	TOW	TOP OF WALL
GL	GROUND LEVEL	TP	TELEGRAPH POLE
GP	GATE POST	TS	TREE STUMP
GV	GAS VALVE	UG	UNDERGROUND
H	HIGH	VA	VALVE
HO	HOLE	VP	VENT PIPE
HW	HEADWALL	W	WIDE
IC	INSPECTION COVER	WL	WATER LEVEL
JB	JUNCTION BOX	WM	WATER METER
KL	KEEP LEFT ROAD SIGN	WO	WASH OUT
LB	LETTER BOX	WP	WOODEN POST
		WV	WATER VALVE

FENCE TYPES

BWF	BARBED WIRE FENCE	IWF	FENCE INTERWOVEN
CBF	CLOSE BOARDED FENCE	LRF	FENCE LARCH LARCH
CLF	CHAINLINK FENCE	PAL	FENCE PALISADE FENCE
CPF	CHESTNUT PALING	PRF	POST & RAIL FENCE
CWF	FENCE CHICKEN WIRE	PWF	POST & WIRE FENCE
IRF	FENCE IRON RAILING	TR	TRELLIS

TREE TYPES

AA	ACACIA	ED	ELDER	OR	ORNAMENTAL
AH	ASH	EM	ELM	PE	PINE
AL	ALDER	FR	FIR	PD	POLLARDED
AN	ASPEN	HB	HORNBEAM	PR	POPLAR
AP	APPLE	HC	HORSE CHESTNUT	SB	SILVER BIRCH
BH	BEECH	HN	HAWTHORN	SC	SWEET CHESTNUT
BL	BLACKTHORN	HY	HOLLY	SU	SPRUCE
BR	BIRCH	HZ	HAZEL	SY	SYCAMORE
CE	CHERRY	LA	LARCH	WB	WHITEBARK
CO	CONIFER	LE	LIME	WT	WALNUT
CR	CEDAR	LN	LONDON PLANE	WW	WILLOW
CY	CYPRESS	ME	MAPLE	YW	YEW
DD	DEAD	OK	OAK	XX	UNKNOWN

SERVICE ABBREVIATIONS

AC	ASSUMED CONNECTION	IL	INVERT LEVEL
AR	ASSUMED ROUTE	KIG	KERB INLET GULLY
BO	BACK DROP	MH	MANHOLE
CC	CONFIRMED CONNECTION	OHL	OVER HEAD LINE
CD	CHAMBER DEPTH	PI	PETROL INTERCEPTOR
COW	CABLE ON WALL	RD	FROM RECORD DRAWINGS
CL	COVER LEVEL	RE	RODDING EYE
CP	CATCH PIT	SK	SOAKAWAY
CB	CABLE RISER	TPT	TRACED POINT
DTB	DEPTH TO BASE	UNK	UNKNOWN SERVICE
D	DEPTH	UTL	UNABLE TO LOCATE
(dis)	DISBURSED	UTR	UNABLE TO RAISE
EOT	END OF TRACE	UTT	UNABLE TO TRACE
GU	GULLY	UTS	UNABLE TO SURVEY

UTILITY LEGEND AND NOTES

UTILITIES ARE DRAWN IN 3D WITH THE LEVEL CORRESPONDING TO THE CENTRE OF THE UTILITY. EXCEPTIONS TO THIS ARE SERVICES AND FEATURES DETECTED BY GPR WHERE THE LEVEL IS THAT OF THE TOP OF THE UTILITY AND SONDE TRACINGS DEPTHS WHERE THE DEPTH IS RELEVANT TO THE POSITION OF THE TRACING SONDE SITTING WITHIN THE PIPE.

THESE ARE DENOTED BY SPECIFIC LAYERS OR LINE TYPES SHOWN IN THE LEGEND OR BY SPECIFIC LABELLING OF THE DRAWING.

CONFIDENCE RATINGS FOR UTILITIES TRACED ARE IDENTIFIED AS LAID OUT IN SECTION 5 OF THE PAS 128:2022 SPECIFICATION FOR UNDERGROUND UTILITY DETECTION. VERIFICATION AND LOCATION. THEY ARE SHOWN WITHIN THE LINE TYPE AS A SUFFIX (SEE EXAMPLE BELOW)

GPR (0.00) GROUND PENETRATING RADAR (DEPTH)

CAUTIONARY NOTES

ELECTRO-DETECTION TECHNIQUES HAVE BEEN USED IN THE LOCATION OF UNDERGROUND SERVICES. THE RESULTS ARE NOT INFALLIBLE AND TRIAL EXCAVATIONS MUST BE CARRIED OUT TO CONFIRM SERVICE IDENTIFICATION. POSITIONS AND PARTICULARLY DEPTHS. ALTHOUGH ALL REASONABLE EFFORT HAS BEEN MADE IN SEARCHING AVAILABLE RECORD DRAWINGS. THE COMPLETENESS OF THE UNDERGROUND SERVICE INFORMATION CANNOT BE GUARANTEED. INFORMATION OBTAINED BY GPR IS INDICATIVE OF BURIED INFRASTRUCTURE THAT MAY NOT BE DETECTABLE BY OTHER MEANS.

DRAINAGE NOTES

PIPES ON THE REPORT ARE REFERENCED CLOCKWISE FROM THE OUTGOING PIPE WITH THE MH NUMBER AS THE PREFIX I.E. MH01A. END POINT LOCATIONS WITHIN BUILDINGS ARE INDICATIVE UNLESS STATED.

Note: Pipe sizes in mm

TECHNICAL NOTES

ALL LEVELS ARE BASED ON ORDNANCE SURVEY DATUM OBTAINED FROM ACTIVE GPS NETWORK. *OSGB36(19)*

A SCALE FACTOR OF 1.000000 HAS BEEN APPLIED TO THIS DRAWING

GRD IS BASED ON OS DATUM. OBTAINED FROM ACTIVE GPS NETWORK. *OSGB36(19)*

ALL KERB LEVELS ARE TAKEN IN CHANNEL

Rev.	Date	Description	By

Drawn by	Surveyed by	Checked by
LK	LK	PD

Project title

7C SOUTH CRESCENT LONDON

Drawing title

DRAINAGE LAYOUT DRAWING

Client

MCFEN PLANT HIRE

Drawing No.	Revision
SDS 209174	—

SCALE 1:200 @ A1	Date	Sheet size
DEC 2023		A1

SURVEY DESIGN SERVICES and ASSOC. LTD. UNITS 13 & 14, FOUNDRY BUSINESS PARK, SEAGER ROAD, FAVERSHAM, KENT. ME13 7FD TEL. 01795 594110 www.surveydesignservices.co.uk

APPENDIX 6 – CLIMATE CHANGE RISK ASSESSMENT

Climate Change Risk Assessment

Facility:	McFen Plant Ltd
Location:	McFen Plant Ltd, Cody Road Industrial Estate, 7C South Crescent, London, E16 4TL
Risk assessment carried out by:	Leisl Heath
Date:	03-Feb-25

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 probability of exposure?	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	Greater potential for increased waste reactions and fires.	Harm to human health - respiratory irritation and illness.	Air transport then inhalation.	Low	Medium	Low	Permitted wastes are non-hazardous, inert, and not dry on receipt. There is therefore a low magnitude risk estimated, because there is no potential for increased waste reactions or fires involving heat sensitive or combustible waste, as these are not present on site.	Ensure that management complies with the regular inspection and preventative maintenance of site, plant and equipment.	Low
Local human population	Potential increased risk of wildfires impacting the site	Harm to human health - respiratory irritation and illness.	Air transport then inhalation.	Very Low	Low	Very Low	Dry vegetation on the yard could pose a fire risk, however, due to the nature of the stored wastes, being inert materials, this would not spread to these stockpiles.	An inspection and maintenance regime is in place to ensure dry vegetation cannot become an issue.	Very low
Local human population	Potential for fire if the temperature exceeds the heat rating of components in electrical equipment or components are subjected to intense and direct sunlight	Harm to human health - respiratory irritation and illness.	Air transport then inhalation.	Very Low	Low	Very Low	The only electrical equipment that operates on the yard that is exposed to direct sunlight is the de-watering plant. The de-watering plant will be regularly checked in accordance with the inspection and maintenance procedures to ensure that it's operation remains safe. The site operates in accordance with an inspection and maintenance procedure which involves routine inspections. These inspections are carried out daily by the site manager and weekly by the COTC holder. Where any damage is found, these shall be reported and repaired within set timescales	Ensure that all electrical equipment/components are stored within the buildings / or covered areas. Ensure that management complies with the regular inspection and preventative maintenance of site, plant and equipment.	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 probability of exposure?	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)
Staff, visitors, local human population	Increase in high temperature expansion and stress of plant, pipework and fittings	Danger to those on site through injury	Physical.	Very Low	Low	Very Low	The site operates in accordance with an inspection and maintenance procedure which involves routine inspections. These inspections are carried out daily by the site manager and weekly by the COTC holder. Where any damage is found, these shall be reported and repaired within set timescales	Ensure that management complies with the regular inspection and preventative maintenance of site, plant and equipment. Should any degradation be noted, the impacted part will be replaced with types of material less susceptible to photo-degradation (should it be available)	Very low
Local human population, livestock and wildlife.	Potential increased dust emissions with reduced availability of water for dust suppression	Nuisance, loss of amenity and harm to animal health	Air transport then deposition	High	Low	Low	There are measures implemented to significantly reduce the risk of dust including installation of 2m high concrete storage bays which will also act as a dust barrier for stockpiles positioned adjacent to the wall. It is crucial to note that all stockpiles will be kept 0.5m below the height of bay walls to reduce the risk of the spread of dust through wind whipping.	The site ensures all vehicles exiting the site have no accumulations of dust, debris and mud on vehicles to prevent the spread of such material onto the public highway. Enforcing a strict speed limit of 5mph. Minimising drop heights when unloading waste. Maintaining good housekeeping across the site	Low
Local human population	Odour intensifying due to increased temperatures both in summer and winter	Nuisance, loss of amenity	Air transport then inhalation.	Low	Medium	Low	The accepted wastes (road sweeper arisings and vacuum excavated construction wastes) are not odorous in nature, and it is not expected to be odorous, however, it might contain some fine organic materials that could sometimes lead to a "musty" odour. Increased temperatures can accelerate microbial activity which leads to fast organic matter breakdown, which might create more odour.	Due to the only potential odour on site arising from the construction waste / aggregate stockpiles, deodorising equipment on site is not required. Alternative measures such as dampening down the inert stockpiles with the onsite water bowser, covering the stockpile with tarpaulin, or reducing the storage times if required, are appropriate in preventing the escape of any odour considering the low risk of odour.	Low
Local human population	Scavenging animals and scavenging birds due to the higher summer temperatures	Harm to human health - from waste carried off site and faeces. Nuisance and loss of amenity.	Air transport and over land	Low	Medium	Low	The accepted wastes (road sweeper arisings) do not attract any animals.	The use of commercial products of a specialist pest control sub-contractor if scavenging animals / pests are detected will also mitigate the risk.	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 probability of exposure?	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	Long periods of hot and dry weather could lead to a drought thus reducing the water supply used to manage the site and put out any fire that may occur	Harm to human health - respiratory irritation and illness.	Air transport then inhalation.	High	Low	Low	The wastes received are inert and therefore do not pose a fire risk / or require fire water. Whilst cleaning and dust suppression is in the form of hoses and water bowsers, in the event of drought, alternative measures for cleaning and dust suppression could be used, i.e. manual sweeping, or covering the stockpiles / bays.	The wastes received by McFen Plant Ltd are largely not dusty in nature. The site is entirely concreted, and all vehicles are only operated on the concrete surface. Any accumulations of dust on site will be removed by hand sweeping, or by a mechanical sweeper.	Low
Local human population	Potential increased use or reliance on mains water for dust suppression and cleaning and provision of fire water due to drier summers	Harm to human health - respiratory irritation and illness. Also nuisance, loss of amenity and harm to animal health	Air transport then inhalation or deposition	High	Low	Low	The wastes received are inert and therefore do not pose a fire risk / or require fire water. Whilst cleaning and dust suppression is in the form of hoses and water bowsers, in the event of drought, alternative measures for cleaning and dust suppression could be used, i.e. manual sweeping, or covering the stockpiles / bays.	As above	Low
Staff, visitors, local human population	Lower winter temperatures could increase risk of pipework and other external equipment freezing	Danger to those on site through injury	Physical.	Very Low	Low	Very Low	The site operates in accordance with an inspection and maintenance procedure which involves routine inspections. These inspections are carried out daily by the site manager and weekly by the COTC holder. Where any damage is found, these shall be reported and repaired within set timescales	Ensure that management complies with the regular inspection and preventative maintenance.	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 probability of exposure?	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 and local environment	Potential for increased site surface water and flooding	If waste is washed off site it may contaminate buildings / gardens / natural habitats downstream.	Flood waters	Medium	Low	Low	This has the potential to cause a surface water drainage system overload, which could lead to flooding on site. The site has a foul and surface water drainage system which incorporates an interceptor and drainage grids. Sandbags will be deployed to the entrance of the site, which is the peak topography of the site, so this will eliminate this as a pollution pathway in the event of a flood. Clay mats will also be placed over the surface gulley pots to contain contaminated water. Sand bags in front of the bays will also stop any flood water reaching the stockpiles and therefore wastes will not be carried off site. The site is located in a Flood Zone 1, indicating that the land is assessed as having less than a 1 in 1000 (<0.1%) annual probability of flooding from rivers and the sea. Additionally, the site is situated in an area where there is a low risk from surface water flooding, and groundwater flooding or flooding from reservoirs is unlikely.	To reduce the likelihood of the drainage system becoming overwhelmed, they are regularly inspected and maintained to reduce any likely blockages. The contents of the tanks are removed periodically by a Registered Waste Carrier to a site licenced to accept this type of material. The drainage systems in place are appropriate and will provide adequate levels of flood protection in the event of increased rainfall. In the event excess surface water is causing the system to be overwhelmed, the drainage system will be reviewed by a specialist and amended to ensure that the site can handle the capacity of water.	Low
Local human population and local environment	There is potential for increased incidents involving water-reactive wastes	Danger to those on site through injury	Physical.	n/a	n/a	n/a	The site does not accept any water-reactive wastes.	n/a	n/a
Local environment, groundwater, and nearby watersystems	There is potential increased impact of discharge to watercourse from on-site drainage systems where connected to water courses.	Unspended solids and increased turbidity, impact on water quality	Drainage system	High	Medium	High	The site has a foul and surface water drainage system which incorporates an interceptor and drainage grids. The site is completely covered by an impermeable concrete surface. Additionally, sandbags will be deployed to the entrance of the site, which is the peak topography of the site, so this will eliminate this as a pollution pathway in the event of a flood. Clay mats will also be placed over the surface gulley pots to contain contaminated water The site is located in a Flood Zone 1, indicating that the land is assessed as having less than a 1 in 1000 (<0.1%) annual probability of flooding from rivers and the sea.	The drainage system will be reviewed by a specialist and amended to ensure that the site does not impact on connected water courses.	Medium
Local environment, groundwater, and nearby watersystems	Potential for increased site surface water and flooding resulting in drainage systems and interceptors being overwhelmed.	Unspended solids and increased turbidity, impact on water quality	Drainage system	High	Medium	High	As above.	As above	Medium
Staff, visitors, local human population, any wildlife sites in the vicinity	If located near the coast, a site could experience increased corrosion due to increase in saltwater spray	n/a	n/a	n/a	n/a	n/a	The site is not located near the coast	n/a	n/a

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 probability of exposure?	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 and local environment	If a site is located near the coast there is potential increased risk of coastal flooding	If waste is washed off site it may contaminate buildings / gardens / natural habitats downstream.	Flood waters	n/a	n/a	n/a	The site is not located near the coast	n/a	n/a
Staff, visitors, local human population, and nearby animals	Potential for high winds to damage buildings and infrastructure and blow waste from the site.	Nuisance, loss of amenity and harm to animal health	Air transport then deposition	Medium	Low	Low	The site carries out inspections and maintenance which will ensure that any damage to buildings are fixed. The sites waste bays which help prevent wind whipping, and stockpiles will be dampened or covered with tarpaulins to minimise the risk of waste blowing from the site.	In the event of high winds, during the inspection and maintenance, buildings and infrastructure are reviewed to identify vulnerable areas to high winds and measures to protect them and mitigate any impacts from damage.	Low
Staff, visitors, local human population	Potential for lightning strikes to damage buildings and infrastructure.	Nuisance, loss of amenity	Access to the site	Low	Very Low	Low	The site carries out inspections and maintenance which will ensure that any damage to buildings are fixed.	During the inspection and maintenance, buildings and infrastructure are reviewed. Should lightning strikes become frequent, the site will look into installing lightning conductors.	Low
Staff, visitors, local human population	Storms and high winds could damage building structures with increased potential for fugitive emissions.	Nuisance, loss of amenity	Access to the site	Very Low	Low	Very Low	Storms and high winds could damage building structures with an increased potential for fugitive emissions. Should a storm and high winds occur, the site may be affected whereby winds can create litter which have the potential to block drains. Debris, including loose materials and damaged equipment, can become projectiles, endangering personnel and damaging property. The impact of this at McFen Plant Ltd would be low, due to the nature and the storage of the wastes at the site. Loose wastes are kept to a minimum, and can be covered with tarpaulin in the event of storms. The storage bays can also be covered with tarpaulins.	Regular site inspections and maintenance are crucial to identify and address potential vulnerabilities before a storm hits. It is important to note, however, that in accordance with the site inspections and maintenance inspections, where any damage is found, it shall be reported and repaired within 7 days. If this is not possible, alternative arrangements shall be made which are outlined in section 5.9 of the EMS. Also, if it is found that repeat damages are occurring, and they are in the same place, management will consider reinforcement options.	Very Low