

ENVIRONMENTAL RISK ASSESSMENT

Kings Court Beacon Road, Poulton Industrial Estate, Poulton-le-Fylde, Lancashire, England,
FY6 8JE

Ashvin Metals Ltd

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CONTENTS

DOCUMENT HISTORY:	I
CONTENTS	II
LIST OF APPENDICES:	III
1 INTRODUCTION	1
1.1 NOTE	1
2 SITE RECEPTORS	3
2.1 SENSITIVE RECEPTORS	3
2.2 COMPLAINTS PROCEDURE	4
2.3 SPILLAGE PROCEDURE	5
3 ENVIRONMENTAL RISK ASSESSMENT MODEL	7
3.1 FUNDAMENTAL CONSIDERATIONS	7
3.2 PATHWAY	7
3.3 CONSEQUENCES	7
3.4 EFFECTS OF CONSEQUENCES	8
3.5 RISK ESTIMATION AND EVALUATION (PROBABILITY/FREQUENCY OF OCCURRING HAZARD)	8
3.6 RISK ASSESSMENT OUTCOME (COMBINATION OF PROBABILITY & CONSEQUENCE)	9
4 RISK ASSESSMENT TABLE	11
5 FLOOD RISK & MANAGEMENT PLAN	22
5.1 SITE LOCATION	22
5.2 SOURCES OF FLOOD RISK	22
5.3 PROBABILITY OF FLOODING	23
5.4 DEPTH AND LEVEL OF THE DESIGN FLOOD	23
5.5 FLOOD EVACUATION AND MONITORING PROCEDURES	23
5.6 SURFACE WATER MANAGEMENT	25
5.7 CONCLUSIONS AND RECOMMENDATIONS	25

List of Appendices:

Appendix I - Drawings

Appendix II - Pre Application Advice

1 Introduction

1.1 Note

1.1.1 This Environmental Risk Assessment (ERA) considers the potential and actual risks associated with the use of the site at Kings Court Beacon Road, Poulton Industrial Estate, Poulton-le-Fylde, Lancashire, England, FY6 8JE as a waste facility that will accept, treat and store mixed metal waste.

1.1.2 The site will be operated by Ashvin Metals Ltd in accordance with a fully comprehensive Environmental Management System (EMS) and Environmental Permit, regulated by the Environment Agency (EA).

1.1.3 All site staff should be provided with a copy of this Environmental Risk Assessment and be aware of where it is located on site.

1.1.4 All environmental risks identified in this document should be acted upon accordingly by site management to ensure all environmental risks can be appropriately managed/controlled.

1.1.5 This document primarily considers environmental risks associated with the site. This does not aim to provide detailed Health and Safety risk assessments as required separately through the necessary legislation.

1.1.6 Specified waste management operations include waste disposal and waste recovery operations listed Annex IIA and IIB of The Waste Framework Directive 2008/98/EC and are listed in summary below:

R3: Recycling or reclamation of organic substances.

R4: Recycling/reclamation of metals and metal compounds

R5: Recycling or reclamation of other inorganic materials.

R13: Storage of waste pending recovery.

D15: Storage pending any of the operations numbered D1 to D14 (excluding temporary storage, pending collection, on the site where it is produced).

1.2 The EP is required for the storage prior to removal and treatment of waste. Waste treatment processes on site will typically include the following:

- a) Sorting (with loading shovel/360° excavator or by hand)
- b) Separation (by using appropriate equipment)
- c) Baling (by using appropriate mechanical plant and equipment)
- d) Dismantling (by using appropriate mechanical plant and equipment)
- e) Grading (by using appropriate mechanical plant and equipment)
- f) Cutting (by using appropriate mechanical plant and equipment)
- g) Repair or Refurbishment (by using appropriate mechanical plant and equipment)
- h) Stripping (by hand)

1.2.2 During times where the site is closed or not in operation, the site will be locked and secured to prevent unauthorised vehicular or pedestrian access.

1.2.3 Management plans required as part of the application have been agreed as part of enhanced pre-application advice which has been discussed throughout this ERA. A copy of the enhanced pre-application advice forms Appendix II of the Non-technical summary (Doc Ref: POUL-3529-C).

2 Site Receptors

2.1 Sensitive Receptors

- 2.1.1 A Sensitive Receptors Plan (Drawing No. POUL-3529-04) is shown in Appendix I which details all potentially sensitive receptors with 1 kilometre from the regulated facility.

- 2.1.2 Table 1 below details the potentially sensitive receptors i.e. designated sites, local businesses and residents within close proximity to the site. These have been addressed further in the Risk Assessment Table detailed in Section 4 of this document.

Table 1 - Sensitive Receptors

Receptor	Direction from Site	Approx distance from the site boundary to the receptor boundary (m)
Commercial / Industrial		
Blackpool Skip Hire	East	0
MJ Teale Recycled Sand & Aggregates	West	0
Antech Hydraulics Ltd	North	32
Steelcraft Gates Ltd	North	40
Elite Linen	Northwest	75
Residential		
Residential property (Holts Lane)	Northwest	390
Residential Property (Garstang Road)	North	445
Schools		
Upbeat Rock Academy	North	385
Carr Head Primary School	Northwest	981
Hodgson Academy	Northwest	940
Watercourses		
Brook	South	11
Infrastructure (major roads and transport links)		
A586	North	481
Poulton-le-Fylde (Railway Line)	Southwest	241
Ecological Sites		
Priority Habitat (Deciduous Woodland)	East	600

2.2 Complaints Procedure

- 2.2.1 The site has a complaints procedure in place. If any complaints (dust/odour/noise etc..) are received (by resident, adjacent receptor, LA or EA), the relevant operator will complete a 'complaints and events log' and complaints form. The operator would also be required to make a note of any unavoidable events plant/equipment malfunctions in the site diary, rather than just actual complaints received. This will ensure that if complaints are received retrospectively from either the council/EA or directly, any

circumstances which led to that complaint as a result of elements outside of the operator's control would be able to be attributed to the cause of the complaint.

2.2.2 There is no threshold for complaints, once the site receives any complaint it will be reviewed, and the site will act accordingly. If the source is within the site's control, the site manager, compliance manager or TCM will take appropriate action in terms of abatement to ensure that the issue/nuisance is controlled and won't happen again; this may take the form of the following:

- Investigating the source of the nuisance to prevent a re-occurrence.
- Suspending operations which are not being conducted using the required control measures (as detailed in the site-specific management plan).
- Additional use of the abatement/control measures.
- Logging findings of the above in the site diary / complaints form and also in the reporting template within the EP.
- Report actions to the complainants and/or EA.

2.3 **Spillage Procedure**

2.3.1 The site does benefit from having a sealed drainage system and is impermeable surfaced across the whole site. The sites drainage comprises of an underground catchment pit which captures any larger material which may go into the drainage network on site, this then leads to the interceptor before being discharged into the adjacent brook (south).

2.3.2 If any oil and vehicle maintenance chemicals are kept on site, they will be stored securely in receptacle containers.

2.3.3 In the unlikely event of a spillage at the site during the unloading operation into the plant, a spill containment kit (absorbent pads, booms or granules) will be used to prevent further spillage and the contaminated absorbents placed in a skip for disposal to a suitably permitted facility.

- 2.3.4 All site surfaces will be inspected daily for the presence of spillages or leaks when the site is in operation, an inspection will be carried prior to cessation of works to ensure no spillages or leaks from tanks/containers are present. Debris will be swept as required and placed in a skip for further processing or sent to a suitably permitted site. Any wastes which would be classified as having the potential to cause polluting runoff are stored in the tanks delivering the loads to site or within the treatment plant on an impermeable concrete pad that will drain to the existing combined sewer system under a Trade Effluent Consent.

3 Environmental Risk Assessment Model

3.1 Fundamental Considerations

- 3.1.1 **Source/Hazard:** A property or situation that in particular circumstances could lead to harm.
- 3.1.2 **Consequences:** The adverse effects or harm as the result of realising a hazard which causes the quality of human health or the environment to be impaired in the short or long term.
- 3.1.3 **Risk:** A combination of the probability of occurrence of a defined hazard and the magnitude of the consequences of the occurrence.

3.2 Pathway

- 3.2.1 Important in the assessment of a particular risk(s) and to inform the subsequent management of the risk(s) is the identification of the pathway(s) through which the risk may affect the identified receptor(s). The following are examples of pathways:

- Air (windblown dust etc.).
- Ground (leaching of contaminants into underlying aquifers).
- Water (hydrocarbon run off into surface waters).
- Direct contact / exposure.

3.3 Consequences

- 3.3.1 The following table highlights the consequences of the hazard(s) identified and the abbreviations for each as used in the Risk Assessment Table in Section 3:

Abbreviation	Consequences
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A	Minor Injury
B	Major Injury
C	Death
D	Air Pollution
E	Water Pollution
F	Pollution of Land

3.4 **Effects of Consequences**

3.4.1 In order to quantify the level of risk and identify the appropriate management procedures, the potential effects must be considered, as outlined in the table below:

Abbreviation	Consequences	Management Requirements
S	SEVERE	In all cases
Mo	MODERATE	In most cases
Mi	MILD	Occasionally
N	NEGLIGIBLE	No

3.4.2 Note: “Management” is the action required to reduce the risk of a hazard causing a problem on site. Contingency measures are procedures which are in place to reduce the consequences of a hazard.

3.5 **Risk Estimation and Evaluation (Probability/Frequency of Occurring Hazard)**

3.5.1 The following table allows the likelihood of an occurrence of an identified risk to be assessed:

Abbreviation	Probability	Evaluation
1	Very likely	Could occur during any working day
2	Likely	Could occur regularly
3	Possible	Event possible
4	Unlikely	Event very unlikely

3.6 **Risk Assessment Outcome (Combination of Probability & Consequence)**

3.6.1 The following table shows the resultant risk of an identified hazard or potential situation. This uses the hierarchy of both probability and consequence to assess the level of risk. The level of risk determines what level of management would be required in order to reduce the risk of occurrence and/or scale.

		Consequence			
		S	Mo	Mi	N
Probability	1	High	High	Medium	Low
	2	High	Medium	Low	Negligible
	3	Medium	Low	Negligible	N/A
	4	Low	Negligible	N/A	N/A

3.6.2 Where the risk assessment outcome is high, first-level management of the risk is essential, i.e. removal of hazard, implementation of major infrastructure/structural design measures to contain the risk/hazard and company policy changes to incorporate the management of the risk. All risk management measures must be supplemented with detailed induction training, spot training and tool-box talks to ensure all site staff and users are made fully aware of the risk/hazard, all potential consequences and necessary management and contingency procedures.

3.6.3 Where the risk assessment outcome is medium, the management of the risk should be tackled by management or delegates. If removal of the hazard is not possible, management will normally be met through implementing minor structural design measures or by imposing procedures for the prevention of occurrences which will be conveyed to all site staff through the appropriate training, including any contingency measures/procedures.

3.6.4 Where the risk assessment outcome is low, the management of the risk can be done wholly through appropriate training to site staff including any contingency measures/procedures.

- 3.6.5 Where the risk assessment outcome is negligible, site staff should be made aware of the possibility of an occurrence and contingency measures should be readily available to all staff should they be required.

4 Risk Assessment Table

- 4.1 The following pages contain the site-specific risk assessment for the site with appropriate remedial actions, recommendations and comments included for each identified hazard, potential contaminant, or situation.
- 4.2 The table also contains references to the appropriate section(s) of the site's EMS for additional management procedures.
- 4.3 As discussed in Section 3.6 above, all situations which identify a risk from Low – High should be incorporated into the staff/visitor training schedule, where appropriate and acted on as required.

SEE TABLES OVERLEAF

Hazard / Potential Contaminant or Situation	Source(s)	Pathway	Receptor(s)	Consequences	Effect	Probability	Assessment Outcome	Remedial Action/ Recommendations/ Comments
Dust / particulates	Site surfaces (dry and windy weather) Treatment of waste by mechanical plant Loading of waste using mobile plant Tracking of dust from mobile plant Poor housekeeping Dry/warm weather conditions	Air	Site personnel/ visitors Surrounding site users/occupiers/residents Surface water adjacent south Flora & fauna Residential receptors Schools Surrounding road networks Receptors detailed in Section 2	A, B, D, E	Mo	2	Low	Site management will ensure that all loads under their control are always sheeted on arrival and egress from the site. Third parties & contractors will be informed by site management to sheet/cover the loads when delivering and egressing from site. In the unlikely event that a load is delivered to the site unsheeted, site management will inform the driver/company that they will need to deliver loads to the site sheeted/covered for all future deliveries. Drop heights will be kept to a minimum (i.e 1-2 metres above ground level) Please refer to the complaint's procedure detailed in section 2.2 of this risk assessment which is always in place at the site. Due to the nature of waste accepted at the site it is t considered that dust would not be an issue. The site does not receive any waste types which would be regarded as having significant dust potential. Any wastes considered unsuitable after deposit will be assigned to the quarantine/rejected skip and removed from site within <48 hours or when the container is full (whichever is sooner). The materials accepted are predominantly mixed metals and therefore not expected to be generate dust. The loads are inspected upon acceptance to the site so it is unlikely that potential dust generating materials would be accepted at the site or need to be stored/ quarantined at the site, the rejected/ quarantine skip acts as a secondary measure. The site will ensure that dust is continuously managed using the following measures: - The site will implement a continuous monitoring regime to identify any potential for dust leaving the site boundary. - Suitable containment around the processing area which will screen the operations The above measures will ensure that potential dust particles are controlled and contained within the facility. The site undertakes onsite monitoring continually throughout the operational day by site management or site operatives. In addition to this, the site also undertakes daily inspections which

Hazard / Potential Contaminant or Situation	Source(s)	Pathway	Receptor(s)	Consequences	Effect	Probability	Assessment Outcome	Remedial Action/ Recommendations/ Comments
								are recorded, these will be undertaken by site management or the TCM. If complaints are received by surrounding receptors or if dust is apparent beyond the site boundary following the daily inspections, the operator will implement further control measures including (but not limited to) the following: - Sourcing the road sweeper immediately, The above measures will minimise potential impacts on the sensitive receptors detailed in section 2.1 and the 'receptor' column of this table. Given that the operator is not increasing the throughput or changing the onsite treatment activities, it has been considered that a dust assessment is not required as part of the application as there will no increased dust generation.
Odour	Stored wastes Poor housekeeping Rejected waste	Air	Site personnel/ visitors Surrounding site users/occupiers/residents Surface water adjacent south Flora & fauna Residential receptors Schools Surrounding road networks Receptors detailed in Section 2	A, D	Mi to Mo	3	Low to near zero	Strict waste acceptance procedures to identify potentially odorous wastes and initiate containment. The site does not receive any waste types which would be regarded as having significant odour potential. Any wastes considered unsuitable after deposit will be assigned to the quarantine/rejected skip and removed from site within <48 hours or when the container is full (whichever is sooner). The materials accepted are predominantly mixed metals and therefore not expected to be odour or pest generating. The loads are inspected upon acceptance to the site so it is unlikely that potential odour generating materials would be accepted at the site or need to be stored/ quarantined at the site, the rejected/ quarantine skip acts as a secondary measure. Please refer to the complaint's procedure detailed in section 2.2 of this risk assessment which is always in place at the site.
Litter	Pre-processing stockpile Unsheeted / poorly sheeted skips on delivery vehicles	Air	Site personnel/ visitors Surrounding site users/occupiers/residents Surface water	A TO C E & F	Mi to Mo	3	Low to near zero	All drivers will ensure their skips / containers are securely sheeted / contained prior to carriage of waste loads. Daily inspections of the site and areas in the immediate vicinity of the site boundary for litter. All light waste / litter will be placed inside a sealed skip.

Hazard / Potential Contaminant or Situation	Source(s)	Pathway	Receptor(s)	Consequences	Effect	Probability	Assessment Outcome	Remedial Action/ Recommendations/ Comments
	Loose/material Poor housekeeping		Flora & fauna Residential receptors Schools Surrounding road networks Receptors detailed in Section 2					The physical properties of the waste types handled at the site will not result in litter – will only be a result of non-conforming waste(s) – waste acceptance and handling procedures in place to prevent occurrences
Noise/vibration	Plant and machinery Operating treatment plant Tipping / loading waste into vehicles	Air	Site personnel/ visitors Surrounding site users/occupiers/residents Surface water adjacent south Flora & fauna Residential receptors Schools Surrounding road networks Receptors detailed in Section 2	A, D	Mo	3	Low	Drop heights will be kept to a minimise noise / vibration. Only operate during the hours listed in the EMS. Management will ensure that all loading plant operated is functioning suitably through preventative maintenance and daily checks to ensure effective operation, i.e. moving parts to be regularly lubricated. Operatives will be informed to turn off engines when the plant is not in use ('no-idling' policy) and no revving of engines will be permitted at the site. Any malfunctions in plant i.e. missing screws/bolts which result in excessive noise will be decommissioned until an alternative loading plant sourced. If repairs to the site are required, the work is to be undertaken during the normal operational hours (listed in EMS) to reduce potential noise nuisance. In the event of major repair work being undertaken which is likely to cause significant noise and disruption, neighboring residents and the local planning authority will be notified in advance. The site is located within an industrial estate. The adjacent operations, i.e. industrial and commercial units will also have constant vehicle movements throughout the day which offset noise generated by onsite operations. Please refer to the complaint's procedure detailed in section 2.2 of this risk assessment which is always in place at the site.

Hazard / Potential Contaminant or Situation	Source(s)	Pathway	Receptor(s)	Consequences	Effect	Probability	Assessment Outcome	Remedial Action/ Recommendations/ Comments
								Baling is undertaken using a baler which is located below ground level which is considered to be significantly less noisy than a above ground baler. Given that the operator is not increasing the throughput or changing the onsite treatment activities, it has been considered that that the noise profile of the site is not changing.
Vermin (leptospirosis etc.)	Stored putrescible/ biodegradable wastes	Water, direct contact with waste	Site personnel/ visitors Surrounding site users/occupiers/residents Flora & fauna Residential receptors Schools Surrounding road networks Receptors detailed in Section 2	A TO C	Mi to mo	3	Low	Wear PPE - gloves and masks as appropriate. Site inspections undertaken daily. Any wastes considered unsuitable after deposit will be assigned to the quarantine/rejected skip and removed from site within <48 hours or when the container is full (whichever is sooner). The materials accepted are predominantly metal wastes and therefore not expected to be odour or pest generating. The loads are inspected upon acceptance to the site so it is unlikely that these materials would be accepted at the site or need to be stored/ quarantined at the site, the rejected/ quarantine skip acts as a secondary measure. The site does not receive any waste types which would be regarded as putrescible/ biodegradable.
Fire - smoke / particulates	Plant exhausts Storage of wastes	Air, direct contact	Site personnel/ visitors Surrounding site users/occupiers/residents Surface water adjacent south Flora & fauna Residential receptors Schools Surrounding road networks Receptors detailed in Section 2	A TO F	Mi to s	3	Low to near zero	No smoking or fires on permitted site. Good site security comprising CCTV, security patrols by staff during the operational day, suitable perimeter fencing and lockable gates to prevent unauthorised access. Preventative maintenance procedures for on-site plant and vehicle fleet. All mobile and fixed plant on site including vehicles in the fleet are subject to annual manufacturer maintenance to ensure proper working order in the form of service contracts. Further details of the sites preventative maintenance have been outlined within the site's EMS. The operator will implement the following: Combustible waste will be stored in accordance with the requirements of the Environment Agencies Fire Prevention Plan guidance. Storage times and quantities are significantly less than those in the guidance.

Hazard / Potential Contaminant or Situation	Source(s)	Pathway	Receptor(s)	Consequences	Effect	Probability	Assessment Outcome	Remedial Action/ Recommendations/ Comments
								- Plant and equipment are maintained in accordance with manufacturer recommendations. - A no smoking policy is implemented on site, those who wish to smoke will need to do so in the designated smoking hut on site which is located 6m from all combustible waste stored on site. - Checks will be performed at the end of each working day to ensure there is no buildup of dust or fluff on plants and equipment to minimise the risk of fire caused by dust settling on hot exhausts and engine parts. - All staff are fully trained in recognition of early fire signs and trained to prevent negligence. - Fire-fighting equipment on site includes mains water, hoses, water storage containers and fire extinguishers. - Site security measures to reduce the risk of arson include lockable gates that remain locked outside of operational hours, 24/7 CCTV and an onsite security guard who remains on site outside of operational hours. - CCTV cameras cover all combustible waste storage and processing areas on site (including within the waste transfer building and external yard). - Inspections are undertaken of waste storage areas to ensure that combustible waste is not stored more than the time periods stated in the FPP. Further mitigation measures and responses implemented in the event of a fire are listed in the FPP, Document Ref: POUL-3529-B_FPP.
Vehicle collision/ accident	Mud on roads from waste storage & vehicle bodies Poor visibility	Direct contact	Vehicle users Pedestrians Animals	A TO F	Mi to s	3	Low	Good housekeeping/ vehicle management i.e daily inspections, keeping site clean at all times, appropriate signage, annual maintenance of plant etc. Stockpile management i.e ensuring stockpiles are stored appropriately (within the relevant storage area, bay or container) and not over vehicles running surfaces.

Hazard / Potential Contaminant or Situation	Source(s)	Pathway	Receptor(s)	Consequences	Effect	Probability	Assessment Outcome	Remedial Action/ Recommendations/ Comments
								Ensure all free-standing waste storage areas are in the correct locations and access are kept clear as shown on Drawing No. POUL/3529/03 Site Layout & Fire Plan. Wear PPE – high visibility jacket as appropriate. An accident logbook should be kept for all incidents. Encouragement for staff for greater number of “accident-free days” to encourage a safer working environment. HSE compliant risk assessments for all site activities to identify situations which may lead to harm for site users (employees, visitors and management).
Leachate	Stored wastes	Ground	Site personnel/ visitors Surrounding site users/occupiers/residents Surface water AD Flora & fauna Residential receptors Schools Surrounding road networks Receptors detailed in Section 2	E, F	Mi to s	3	Low	Daily checks of site surface and infrastructure. The site is split into two areas: SITE A- Is primarily used for the storage of empty skips with the storage of baled aluminium being stored inside the building. The external storage bays will only be used for non-waste storage. SITE A comprises of a concreted surface with all surface water draining towards the surface water drain located just outside the site’s entrance/exit. SITE B- Is the southern site where the main waste operations take place and storage of wastes within the external yard are stored within 3-sided concrete panel bays. SITE B comprises of a series of surface water drainage channels and manholes which the surface water here all drains towards the underground catchpit where large fragments are captured before draining into the site’s interceptor. From the interceptor the surface water is then discharged into the Main Dyke located south of the site. Any spillages identified will be dealt with in accordance with the spillage procedures outlined in the EMS. In the event of a spillage a spill containment kit (absorbent pads, booms or granules) will be used to prevent further spillage and the contaminated absorbents placed in a skip for disposal to a suitably permitted facility. Waste storage bays located in SITE B in the southern yard are engineered to slope backwards meaning any rainwater which

Hazard / Potential Contaminant or Situation	Source(s)	Pathway	Receptor(s)	Consequences	Effect	Probability	Assessment Outcome	Remedial Action/ Recommendations/ Comments
								may have come into contact with the waste from high winds causing rain to be blown into the bay through the open front will remain in the bay until evaporated and won't be discharged to surface water. Waste stored in containers will be sealed, containers will not be overfilled so waste spills over the edges having the potential for leachate to be produced and discharged off site to surface water or the area of free draining land to the northwest of the site. Therefore, the production and discharge of leachate from the northern area of the site is considered low risk. Other mitigation measures to prevent leachate off site are outlined below: • All waste storage and processing areas on site comprise of an impermeable concrete pad. SITE B is fully sealed to contain any water. • Fuel and liquid storage on site are stored with a bund capable of containing 110% of the volume stored in the tank. Containment requirements will be in accordance with CIRIA C736 'Containment systems for the prevention of pollution' in the event of a spillage this will be dealt with in accordance with the spillage procedure in the Environmental Management System, see document ref. POUL-3529-A_EMS. • All waste stored externally in SITE B is sorted/processed non-hazardous that presents a very low risk of contamination. • The integrity of the impermeable pad is checked by site operatives as part of the inspection checklists to ensure it is in good condition. Any defects or faults are reported to the site manager. • Actions to repair any faults are recorded and undertaken as soon as practicable to prevent further risk. • Any wastes which are liable to give rise to contamination will be removed from site or placed into a quarantine skip/area.

Hazard / Potential Contaminant or Situation	Source(s)	Pathway	Receptor(s)	Consequences	Effect	Probability	Assessment Outcome	Remedial Action/ Recommendations/ Comments
								The FPP has a dedicated section on firewater containment measures. All site surfaces will be inspected daily for the presence of spillages when the site is in operation. Debris will be swept as required and placed in a skip for further processing on site and sent to a suitably permitted site.
Impact / injury	Collapse of stored materials/ falling materials	Direct contact	Site personnel/ visitors	A TO C	Mi to s	3	Low	Drop heights will be kept to a minimum (i.e 1-2 metres above ground level) Appropriate PPE issued to all site staff and available in the main site office. Staff training and handling procedures in place.
Hydrocarbons	Unbunded fuel tanks Drips when refuelling During delivery Leakage from stored drums Plant failure	Ground - direct contact, ingestion Inhalation (of volatiles)	Site personnel/ visitors	A, B, D, E, F	Mi to s	3	Low	Any fuel tanks (and pipework) are to be stored within a bunded area. Ensure that all fuel drums continue to be stored securely and bunded to contain all pipework and 110% capacity of the tank. Spill kits kept close to source(s) of hazards. Preventative maintenance procedures for on-site plant and vehicle fleet. All mobile and fixed plant on site including vehicles in the fleet are subject to annual manufacturer maintenance to ensure proper working order in the form of service contracts. Further details of the sites preventative maintenance have been outlined within the site's EMS. Any spillages identified will be dealt with in accordance with the spillage procedures outlined in the EMS. In the event of a spillage a spill containment kit (absorbent pads, booms or granules) will be used to prevent further spillage and the contaminated absorbents placed in a skip for disposal to a suitably permitted facility. All site surfaces will be inspected daily for the presence of spillages when the site is in operation. Debris will be swept as required and placed in a skip for further processing on site and sent to a suitably permitted site.

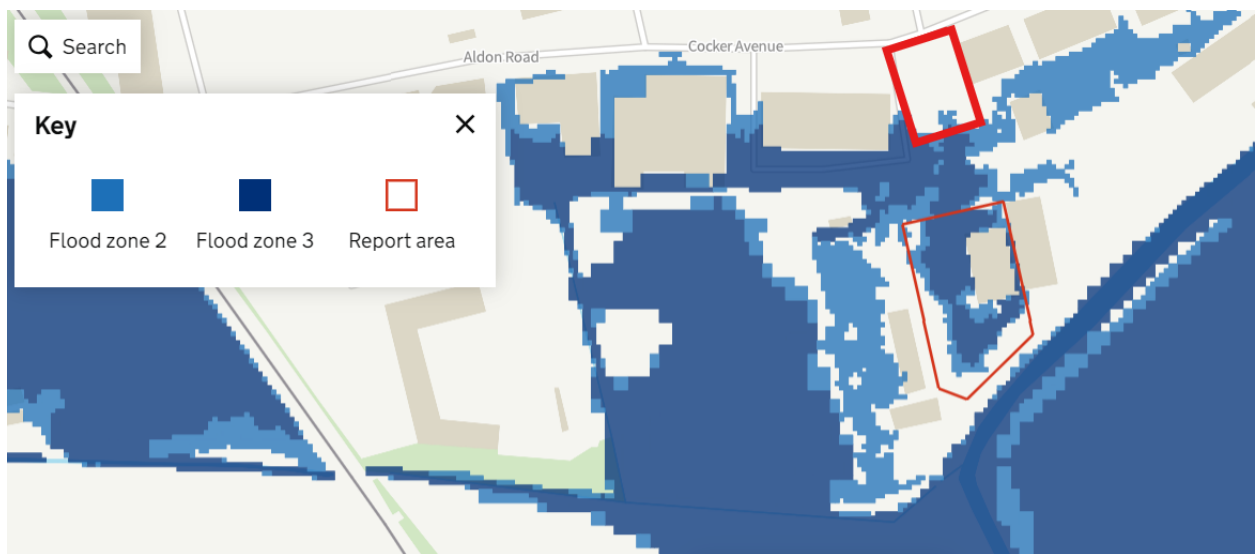
Hazard / Potential Contaminant or Situation	Source(s)	Pathway	Receptor(s)	Consequences	Effect	Probability	Assessment Outcome	Remedial Action/ Recommendations/ Comments
Release of gases / fumes / vapours / volatiles	Mixing of waste/ chemicals Spillage of chemicals Overtured vehicle Plant/plant failure Reaction between stored wastes	Air Ground Water Confined spaces	Site personnel/ visitors Surrounding site users/occupiers/residents Surface water Flora & fauna Residential receptors Schools Surrounding road networks Receptors detailed in Section 2	A TO F	Mi to s	3	Low	Ensure any storage of hazardous substances i.e. Fuels etc. In properly designated areas (i.e. on buildings or in the site office). Preventative maintenance schedule for plant/machinery. Quarantine of rejected /non-confirming wastes. All refrigerant cooling units will be degassed prior to acceptance into the site and will therefore not contain any blown foam insulation containing CFCs or flammable gas.
Acceptance, storage & treatment of mixed metals, hazardous waste i.e. cables, batteries and ELV's etc..	Acceptance and storage of wastes Treatment of wastes Reaction between stored wastes	Ground Water	Site personnel/ visitors Surrounding site users/occupiers/residents Surface water Residential receptors Schools Surrounding road networks Receptors detailed in Section 2	A, D, E, F	Mi to Mo	3	Low – near zero	All activities are undertaken on a concrete pad to prevent to reduce the pathway to ground and water including pathway to any designated sites and priority habitats listed in Section 2.1 or receptor column of this table. Quarantine of rejected /non-confirming wastes. Cables will be accepted at the site, these will be bulked up for loading and removal off site. The site does not treat any cable. As part of the sites operations the site will accept lead acid batteries and other cable such as 17 04 10* and 16 01 22, however will not treat cable or batteries apart from bulking to store and to remove off the site. Resultant hazardous components i.e. grease papers and other remaining elements from the cable are taken to external IBC's which are stored under a lean to for temporary storage prior to being removed off site to a company who is permitted to handle and process the hazardous waste. The additional hazardous codes cover waste streams and cables which were discussed during enhanced pre-application discussions, the site will manage the hazardous waste in the

Hazard / Potential Contaminant or Situation	Source(s)	Pathway	Receptor(s)	Consequences	Effect	Probability	Assessment Outcome	Remedial Action/ Recommendations/ Comments
								same manner that they handle existing hazardous waste streams at the site; therefore it is considered there is no increased risk as a result of the codes.

5 Flood Risk & Management Plan

5.1 Site Location

- 5.1.1 The site is located within Flood Zone 3 these areas refer to areas with high probability of flooding, specifically a 1% or greater chance of river flooding or a 0.5% chance of sea flooding each year. It must be noted that that the site is within close proximity to Flood Zone 1 areas which are located to the west approximately 150m from the site and north. The capture below illustrates the two areas of the site (SITE A and SITE B).



5.2 Sources of flood risk

- 5.2.1 The principal source of flood risk in respect of the site is the Main Dyke which is located to the south of the site which is a confluence of the River Wyre located north east. The River Wyre generally flows towards its mouth at Fleetwood. The elevation of the land at the site is approximately 2m higher than the Main Dyke located to the south it is likely that areas of the site within Flood Zone 3 during a 1 in 100 year flooding event the site given the increase in elevation and the fact that there is a further 3m in height interlocking concrete panel walls the site is not likely to be inundated from the south.
- 5.2.2 Based on information presented on the GOV.UK website the northern site (SITE A) is shown to be within Flood Zone 1, which is indicative of an area with low probability of

flooding, specifically less than a 1 in 1000 annual probability of river or sea flooding (less than 0.1%).

- 5.2.3 Based on information presented on the Gov.UK website the site is not located within the maximum extent of an area which is at risk of reservoir flooding.

5.3 **Probability of flooding**

- 5.3.1 Based on the information presented in the section above, there is no significant risk posed to the site by flooding due to other sources. The operator is unaware of any other potential sources of flood risk to the site.

5.4 **Depth and level of the design flood**

- 5.4.1 The elevation of the site surface is approximately 7m AOD and the site is generally flat. The level of the surface water feature 'Main Dyke' is 2m below the sites surface level. The sites perimeter to the south, east and west boundary comprises 3m high interlocking concrete panel walls which provides a suitable flood barrier to prevent inundation in the event of a flood.

5.5 **Flood Evacuation and monitoring procedures**

- 5.5.1 During the 1 in 100 year/1 in 200 year flooding event the site is most likely to be inundated from the east/south, however, the measures given in the perimeter fencing mentioned in Section 5.4 and the sites elevation will reduce the risk of flooding on site.
- 5.5.2 The site is in the flood warning or alert area in respect of the River Wyre. The operator will sign up to receive flood warnings and alerts from the EA in this area. The three-day flood risk forecast in respect of the area will be monitored as appropriate and in particular if heavy rain is expected in the coming days.
- 5.5.3 In the event that a flood alert is issued all mobile plant and equipment will be moved to higher ground (SITE A) or impounded in the on-site building in preparation for the evacuation (if necessary) of the site.

- 5.5.4 5.5.4 The EA Flood line will be contacted on 0845 988 1188 as necessary for up-to-date flooding information. Hauliers expected to make deliveries and collections of waste or material to or from the site during or following shortly the expected duration of any flooding event will be contacted and the deliveries rescheduled for a later time should the EA advise that there is a significant possibility of flooding at the site.
- 5.5.5 The number of site personnel will be minimised insofar as is practicable whilst any flood alert is in place in order to facilitate the evacuation of the site in a prompt manner. A watching brief will be kept on water levels of the River Wyre and the Main Dyke. Should water levels be observed to rise to levels at which it is considered by the Site Manager a significant risk of the inundation of the site or surrounding industrial estate, the site will be evacuated immediately via the access road to the north of the site i.e. Beacon Road, which is not located in a flood risk zone.
- 5.5.6 In the event Beacon Road to the north of the site is flooded or inaccessible due to traffic congestion, personnel evacuating the site will head north west out of the site onto Cocker Avenue and then onto Aldon Road.
- 5.5.7 In the event that a Flood Warning is issued all fixed plant will be shut down, all mobile plant will be moved to the highest ground and the site will be secured and evacuated immediately, provided that in the opinion of the site manager, there is no significant risk of the rapid inundation of the site.
- 5.5.8 No deliveries or collections of wastes or materials to or from the site will take place whilst a Flood Warning or Severe Flood Warning is in place. If, in the opinion of the site manager, the inundation of the access road is imminent, the site will be evacuated immediately with personnel heading north/north west towards Beacon Road/Cocker Avenue as discussed above as necessary. If the evacuation of the site is not possible due to the inundation of the access road, site personnel will assemble in the site offices, contact the EA and/or the emergency services and await advice or instruction.
- 5.5.9 In the event a Severe Flood Warning is issued site personnel will evacuate the site immediately if it is practicable to do so, thence heading north and then west to higher

ground on Aldon Road. If evacuation is not feasible due to the inundation of the access road site personnel will assemble to the site offices, contact the EA and/or the emergency services and await advice or instruction.

- 5.5.10 Due to the likely low depths of water at the site during the 1 in 100 / 200 year events and in the initial stages of the 1 in 1,000 year events it is extremely unlikely that the site may be inundated to a sufficient depth to prevent evacuation of site personnel to higher ground.

5.6 **Surface water management**

- 5.6.1 Following the proposed development rainwater incident to the site will drain to ground consistent with the current situation. The site is generally flat but direction of flow slopes to the south, in the direction of the discharge point into the Main Dyke. In the event of a flood the site will stop all flow into the Main Dyke.
- 5.6.2 It is unlikely there would be any potential contamination of groundwater or surface water from the waste stored i.e. clean segregated metals / equipment on site which is subject to annual preventative maintenance by the manufacturer and daily checks by the applicant to ensure it is fit for purpose which will reduce the potential for leakages/spillages. No fuels/liquids are stored at the site and the site office will contain spill kits in the event of a plant/vehicle malfunction.

5.7 **Conclusions and recommendations**

- 5.7.1 It is concluded that the measures set out in the flood evacuation plan are sufficient for the site to be evacuated safely and in good time in the scenario where an extreme flood affects the site.
- 5.7.2 It is recommended that this risk assessment of flooding is reviewed and updated as necessary should new information become available in respect of the risk of any potential source of flooding to the site or following the inundation of the site by any source of flooding in the future.

Appendix I

Drawings

Waste Storage Area Details - PILE SIZES BASED ON AREA OF STOCKPILE ON SITE PLAN NOT LENGTH X WIDTH											
Plan Ref	Description	Storage type	Containment	Height/width of wall (m)	Max Width (m)	Max Length (m)	Height (m)	Max area (m2)	Conversion factor used	Volume (m3)	Storage duration
AREA 1	Baled aluminium	Processed/baled	Free-standing pile	2.5/0.6	8.5	10.5	1.5	89	1	134	<8 weeks
AREA 2A	Aluminium overflow	Source segregated or hand sorted	40 cubic yard skip	N/A	2.44	6.1	2.62	15	1	39	<24 hours
AREAS 2B - 2C	Aluminium overflow	Source segregated or hand sorted	Free-standing pile inside three-sided concrete panel storage bay	2.5/0.6	4.2	5.8	1.5	24	0.75	27	<24 hours
AREA 3	Lead acid batteries	Unprocessed	Sealed acid resistant basic containers stacked two high with weatherproof covering	N/A	1	1.2	0.65	0.85 (per container)	1	0.8 (per container)	<8 weeks
AREA 4	Cast aluminium	Source segregated or hand sorted	Free-standing pile inside three-sided concrete panel storage bay	3/0/3	4.5	5.4	2	24	0.75	36	<8 weeks
AREA 5	Swarf aluminium	Source segregated or hand sorted	Free-standing pile inside three-sided concrete panel storage bay	3/0/3	7	6	2	42	0.75	63	<8 weeks
AREA 6	Stainless steel - non ferrous	Source segregated or hand sorted	Free-standing pile inside three-sided concrete panel storage bay	3/0/3	4.3	5.8	2	25	0.75	37	<8 weeks
AREA 7	Alloy wheels	Unprocessed	Free-standing pile inside three-sided concrete panel storage bay	3/0/3	4.1	5.4	2	22	0.75	33	<8 weeks
AREA 8	Overflow	N/A	Free-standing pile inside three-sided concrete panel storage bay	3/0/3	4.3	5.5	2	24	0.75	35	<8 weeks
AREA 9	Lead	Unprocessed	Free-standing pile inside three-sided concrete panel storage bay	3/0/3	4.5	5.5	2	25	0.75	37	<8 weeks
AREA 10	Painted aluminium	Source segregated or hand sorted	Free-standing pile inside three-sided concrete panel storage bay	3/0/3	3.8	5.4	2	21	0.75	31	<8 weeks
AREA 11	Alloy wheels	Unprocessed	Free-standing pile inside three-sided concrete panel storage bay	3/0/3	9	5.7	2	51	0.75	77	<8 weeks
AREA 12	Old rolled aluminium	Source segregated or hand sorted	Free-standing pile inside three-sided concrete panel storage bay	3/0/3	9.3	5.5	2	51	0.75	77	<8 weeks
AREA 13A	Aluminium - press & shear	Source segregated or hand sorted	Free-standing pile inside three-sided concrete panel storage bay	3/0/3	7.9	8.8	2	70	0.75	104	<8 weeks
AREA 13B	Aluminium - painted	Source segregated or hand sorted	Free-standing pile inside three-sided concrete panel storage bay	3/0/3	9	5.4	2	49	0.75	73	<8 weeks
AREA 13C	Aluminium - cuts	Source segregated or hand sorted	Free-standing pile inside three-sided concrete panel storage bay	3/0/3	9.4	5.8	2	55	0.75	82	<8 weeks
AREA 13D	Aluminium - H30	Source segregated or hand sorted	Free-standing pile inside three-sided concrete panel storage bay	3/0/3	11	6	2	66	0.75	99	<8 weeks
AREA 14	Household wire	Source segregated or hand sorted	Free-standing pile inside three-sided concrete panel storage bay	3/0/3	4.4	5.6	2	25	0.75	37	<8 weeks
AREA 15	Low grade cable	Source segregated or hand sorted	Free-standing pile inside three-sided concrete panel storage bay	3/0/3	4.4	5.6	2	25	0.75	37	<8 weeks
AREA 16	Baled brass	Processed/baled	Free-standing pile	N/A	4	4.6	2	18	1	37	<8 weeks
AREAS 17A - 17C	Heavy brass	Source segregated or hand sorted	Free-standing pile inside three-sided concrete panel storage bay	3/0/3	6	4.6	2	28	0.75	41	<8 weeks



TITLE:
SITE LAYOUT & FIRE PLAN

CLIENT:
Ashwin Metals Ltd



Oaktree Environmental
Waste, Planning & Environmental Consultants

PROJECT/REF:
Kings Court, Beacon Road, Poulton-le-Fylde FY6 8JE

SCALE @ A0:
1:200

DRAWING NO:
POUL-3529-03

DATE:
24.04.25

CLIENT NO:
3529

REV:
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DRAWN:
JWH

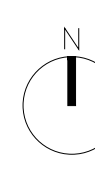
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CP

JOB NO:
004

STATUS:
Issued

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CP

NOTES
Drawing for indication only. All dimensions in millimetres (mm) unless otherwise specified. This drawing is copyright and property of Oaktree Environmental Ltd.


Scale bar 0 1 2 3 4 5 6 7 8 9 10m

KEY:

--- Permit boundary

Waste storage areas

Non-waste storage areas

Hazardous waste storage areas

Non-waste fuel, fluids & gas bottles

Temporary storage/tipping areas

Concreted areas

Waste recycling/ storage buildings (impermeable concrete floor)

Office/welfare

Out of hours plant storage

300mm thick solid concrete wall

600mm thick interlocking concrete block wall

Quarantine area

Firefighting equipment/extinguishers

Fire alarms

Spill kits

Plant shut off

Mains Water

Designated smoking area

Fire assembly points

Access route for emergency services

Fire water containment equipment i.e booms

Parajilt & zone cameras with 360 50cm coverage

Heat detection cameras

Fire water containment boom

Surface water fall direction

Surface drainage

Manhole

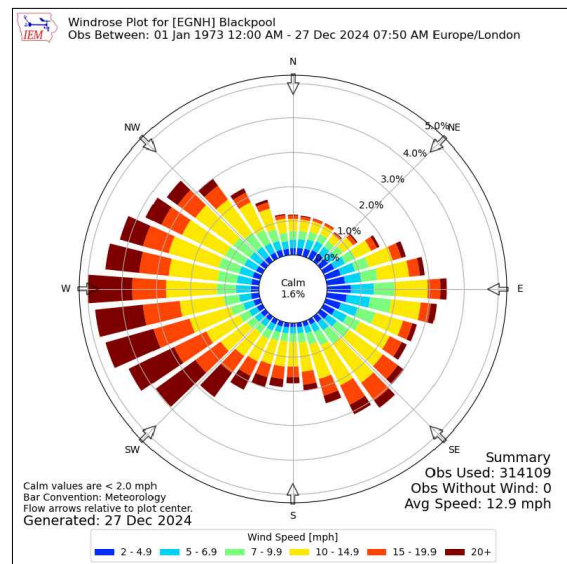
Gully

INT: Interceptor

Fire hydrant

Rev	Date	Int	Description
-	24.04.25	JH	Initial drawing

	Permit boundary
	Main River
	Surface water body (river / stream / pond / pool / lake)
	Workplaces (includes agriculture industry, commerce and retail)
	Areas with mix of residential, retail and commercial properties
	Residential blocks
	Class A, B, C roads
	Nearest fire hydrant
	Railway line
	School
	Woodland areas
	Priority habitat inventory (deciduous woodland)



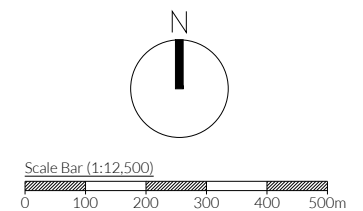
The map displays the area around Poulton-le-Fylde and Singleton C. A proposed development area, labeled 'H' in a yellow circle, is situated in the center. Concentric circles around 'H' indicate distances of 200m, 400m, 600m, 800m, and 1,000m. Key locations and features include:

- Industrial Estate:** Located to the east of the development area.
- Gannon Oils:** Located near the Industrial Estate.
- Main Dyke:** A major waterway running through the area.
- Long Wood:** A large green area to the east of the development.
- Knowle Wood:** A green area to the southeast.
- Carr Wood:** A green area to the south.
- Shire Farm:** Located to the southwest of the development.
- Hardhorn:** A residential area to the southwest.
- Hardhorn Village:** A residential area to the south.
- Brookholes Wood:** A green area to the south.
- Puddle House Farm:** Located to the south.
- Fairfield Ceramics:** Located to the south.
- Fairfield Farm:** Located to the south.
- Station Road:** A road running through the bottom right.
- Avenham Hall:** Located to the southeast.
- Avenham Wood:** Located to the southeast.
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- BS100:** A road running through the bottom right.

1. Boundaries are shown indicatively.
2. Wind rose data shows the prevailing wind direction to be Southerly.

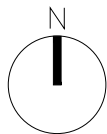
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REVISION HISTORY			
Rev:	Date:	Init:	Description:
-	24.03.25	JH	Initial drawing



TITLE: RECEPTOR PLAN		
CLIENT: Ashvin Metals Ltd		
PROJECT/SITE: Kings Court, Beacon Road, Poulton-le-Fylde FY6 8JE		
SCALE @ A3: 1:12,500	CLIENT NO: 3529	JOB NO: 004
DRAWING NO: POUL-3529-04	REV: -	STATUS: Issued
DATE: 24.03.25	DRAWN: JH	CHECKED: CP





Scale Bar (1:25,000)



NOTES

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REVISION HISTORY

Rev:	Date:	Init:	Description:
-	24.03.25	JH	Initial drawing

KEY:

 Site location

TITLE:

SITE LOCATION MAP

CLIENT:

Ashvin Metals Ltd

PROJECT/SITE:

Kings Court, Beacon Road, Poulton-le-Fylde
FY6 8JE

SCALE @ A4:

1:25,000

CLIENT NO:

3529

JOB NO:

004

DRAWING NO:

POUL-3529-04

REV:

-

STATUS:

Issued

DATE:

24.03.25

DRAWN:

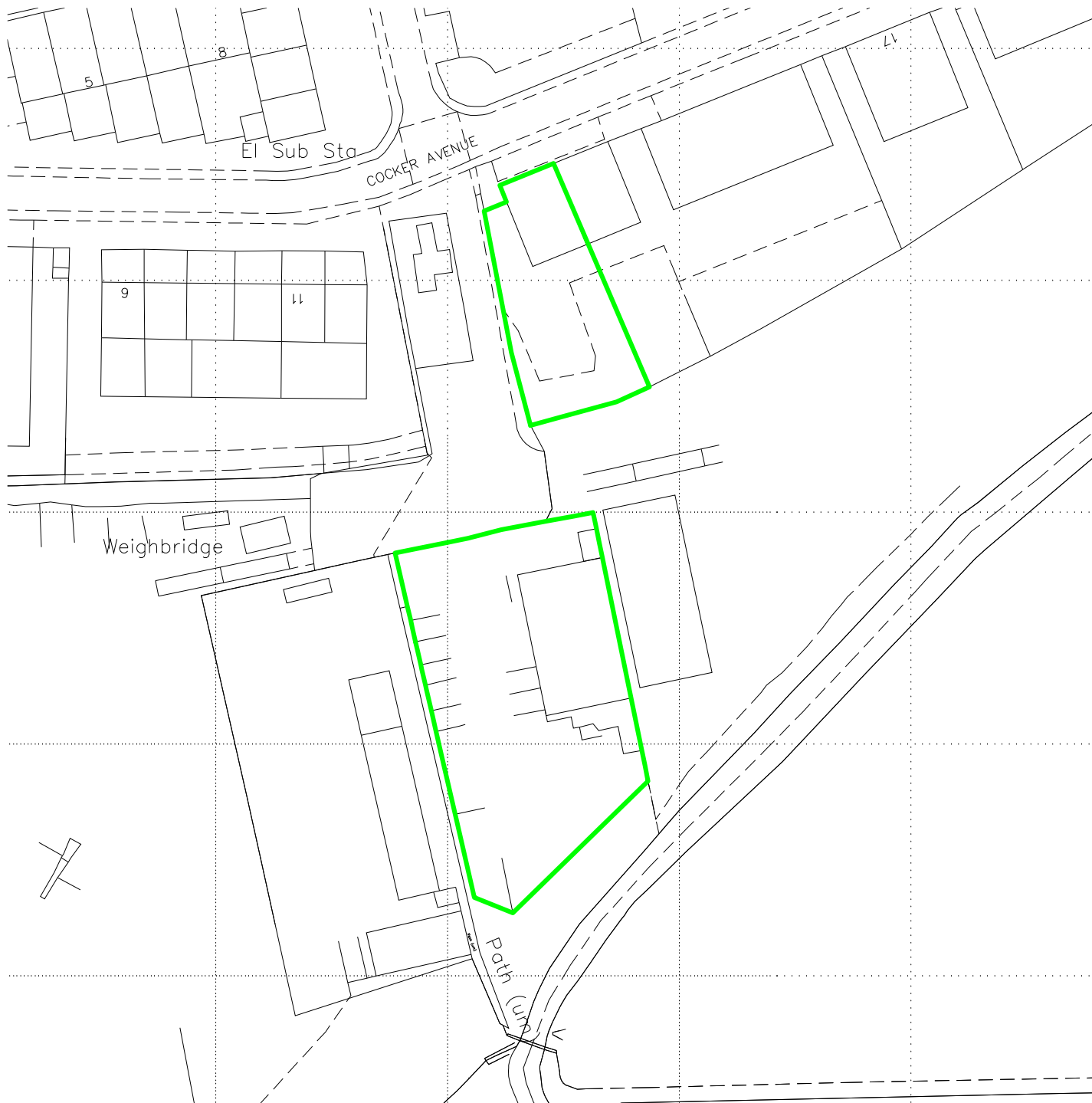
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CHECKED:

CP

 **Oaktree Environmental**
Waste, Planning & Environmental Consultants





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REVISION HISTORY			
Rev:	Date:	Init:	Description:
-	24.03.25	JH	Initial drawing

KEY:

——— Permit boundary

N

Scale Bar (1:1,250)

TITLE:		
PERMIT BOUNDARY PLAN		
CLIENT:		
Ashvin Metals Ltd		
PROJECT/SITE:		
Kings Court, Beacon Road, Poulton-le-fylde FY6 8JE		
SCALE @ A4:	CLIENT NO:	JOB NO:
1:1,250	3529	004
DRAWING NO:	REV:	STATUS:
POUL-3529-02	-	Issued
DATE:	DRAWN:	CHECKED:
24.03.25	JH	CP



Appendix II

Pre Application Form

Rachel Hulme

Ashvin Metals Limited

Date: 20/02/2025

Kings Court Recycling Centre

Beacon Road

Poulton le Fylde

FY6 8JE

Dear Rachel Hulme,

Pre application advice – Enhanced service

Pre-application reference EPR/NP3125SS/P003

Site: Ashvin Metals Limited, Kings Court Recycling Centre, Beacon Road, Poulton le Fylde, FY6 8JE

Thank you for your pre application enquiry on 28/11/2024.

I am pleased to provide you with your pre-application advice. This advice is based on the information provided on your pre application advice form and email on the following date:

- Email on 19/02/2025

Preapplication Advice

In response to your request please note the following advise

Site location, screening for SR2015 No 3, based on the location criteria for the rule this standard rules does not screen out for this site. Please note further checks will be undertaken at assessment of any application.

This permit does not permit ELVs requiring depollution, if you intend to take undepolluted ELVs at this site then SR2015 No 3 is not suitable.

SR2015 No3 allows cable under 16 01 22 and 17 04 11 so the hazardous equivalent waste 16 01 21* and 17 04 10* can be accepted under RPS 276: Storing and treating hazardous waste cable. The RPS only covers cable from construction and demolition and from ELVs. The RPS does not cover hazardous cable from other sources such as WEEE see coding advice <https://www.gov.uk/guidance/classify-some-waste-electrical-devices-components-and-wastes-from-their-treatment> though the waste codes for these are listed in the SRP permit.

Wire stripping is not listed directly in the Standard Rules Permit (SRP) SR2015 No 3 but it includes cutting, separation. We can confirm the cable stripping activity can be carried out under the standard rules as a cutting and separating activity.

Other types of treatment of cable such as granulation are considered as physico-chemical treatments and would fall under the IED limits of 50t storage and 10t treatment limit for hazardous waste above which we would consider this an Installations activity.

We do not view stripping wire as a physical treatment it is manual so is not considered against IED restrictions on storage pending treatment and treatment limits.

We would consider the manual treatment of cable as part of the WEEE activity exclusion within the activity table of the SRP which would exclusion the manual treatment of cable from the IED 50t storage and 10t treatment limits.

The SRP SR2015 No 3 also includes specific requirements regarding the nature of the surfacing and drainage for the storage and treatment of the wastes under the rule set. You have identified that the external yard areas of the site have concrete (impermeable) surfacing and discharge to surface water. The SRP does not authorise point source emissions to water therefore these yard areas are potentially not suitable for the storage or treatment of waste under the SRP. The [risk assessment](#) for SR2015 No 3 details in parameter 10 that uncontaminated metal can be stored on impermeable pavement with sealed drainage, and under parameter 11 that only surface water from roofs of buildings and areas of the facility not used for the storage or treatment of waste can discharge to controlled waters from a point source. The risk assessment is part of the activity applied for along with the rule set. Please refer to the rule set and risk assessment for the full requirements on the surfacing and drainage requirements for waste storage and treatment.

The SRP also includes an interpretation section 4.0 this provides information on the requirements for impermeable surfacing and sealed drainage:

“impermeable surface” means a surface or pavement constructed and maintained to a standard sufficient to prevent the transmission of liquids beyond the pavement surface, and should be read in conjunction with the term “sealed drainage system” (below).

“sealed drainage system” in relation to an impermeable surface, means a drainage system with impermeable components which does not leak and which will ensure that: (a) no liquid will run off the surface otherwise than via the system; (b) except where they may lawfully be discharged to foul sewer, all liquids entering the system are collected in a sealed sump.

Standard rules permit [SR2015 No 3](#)

What this enhanced pre application advice covers

As part of this service, we have provided you with the following information:

Documents attached: Basic pre-application advice for an application.

What enhanced pre application covers

Further information on the enhanced pre-application service is detailed on section 2 of the [Environmental permitting charges guidance on GOV.UK](#).

As part of this service we have provided you with the following information:

Application reference number	EPR/NP3125SS/P003
Documents attached	Basic pre-application advice for an application
Application charge required	£3,926 under 1.16.63

customer service line **03706 506 506**

floodline **03459 88 11 88**

incident hotline **0800 80 70 60**

Page 2 of 4

LIT 55346

28/3/2023

Application reference number	EPR/NP3125SS/P003
Forms required to be submitted	Part A, Part C1, Part F1 <u>Change, transfer or cancel your environmental permit - GOV.UK</u>
Additional documents required	Fire prevention plan

You must ensure you provide dates of birth for all appropriate people as per Appendix 1 in form Part A. Failure to do so will delay your application being put into our systems. Please note that these details will not be made available on the Public Register.

A complete application must contain the following information below:

Declaration	Please ensure the declaration section is completed by each relevant person. For a limited company, this must be a director/company secretary as listed on Companies House.
Site Plan	Site plan must be clearly marked with the full site boundary
Payment	Please note your application will not be processed until we receive the full payment.

What happens next?

If you submit an environmental permit application then please quote this pre-application reference number: EPR/NP3125SS/P003

If the advice above details using the [online digital application form](#), your application can be submitted using this method. If not, please send your completed application documents via email to:

psc@environment-agency.gov.uk

Please email applications where possible. If email is not possible you can submit by post to:

Environment Agency, Permitting Support Centre, Quadrant 2, 99 Parkway Avenue,
Sheffield, S9 4WF

Disclaimer

customer service line **03706 506 506**

incident hotline **0800 80 70 60**

floodline **03459 88 11 88**

Page 3 of 4

The advice given is based on the information you have provided, and does not constitute a formal response or decision of the Environment Agency with regard to future permit applications. Any views or opinions expressed are without prejudice to the Environment Agency's formal consideration of any application. Please note that any application is subject to duly making and then full technical checks during determination, and additional information may be required based on your detailed submission and site specific requirements and the advice given is to address the specific pre-application request.

This advice covers waste only.

(select the relevant options above as appropriate)

Other permissions from the Environment Agency and/or other bodies may be required for associated or other activities.

Enhanced pre application cost estimate

At this stage the pre-application advice is expected to cost up to £300 plus VAT. An invoice will be sent separately at a later date.

This pre-application request is now closed.

We consider this pre application request is now closed however if you have any questions regarding this letter please contact Tim Ross tim.ross@environment-agency.gov.uk.

If you require additional enhanced pre-application advice please complete our [online form](#).

We look forward to working with you on this project.

If you have any questions please call 03708 506 506.

Yours faithfully

Tim Ross

tim.ross@environment-agency.gov.uk

customer service line **03706 506 506**

incident hotline **0800 80 70 60**

LIT 55346

28/3/2023

floodline **03459 88 11 88**

Page 4 of 4