

**Environmental risk assessment for Valley Trading, based on standard rules set number SR2015 No6 v4.0 and SR2008 No3, which the site currently holds**

<b>Standard Facility:</b>	Waste Operation: Household, Commercial and Industrial Waste Recycling Facility with treatment
<b>Location:</b>	Valley Trading Permit Ref EPR/LB3700LZ
<b>Location of environmentally sensitive sites (km / m):</b>	Greater than 50m (see below)
<b>Risk assessment carried out by:</b>	Land & Mineral Management
<b>Date:</b>	07 07 2023

The scope of the permit a is defined by the following risk criteria:

- Parameter 1 Permitted activities - The storage and repackaging of waste (D15, R13, D14) and treatment consisting only of manual sorting, separation, screening, baling, shredding, crushing or compaction (D9, R3, R4, R5).  
Permitted waste types - Non hazardous Household, Commercial and Industrial Waste, one additional waste code 19 12 12 from the SR set of codes
- Parameter 2
- Parameter 3 Quantity of waste accepted at the facility: <100,000 tonnes per annum.
- Parameter 4 The quantity of tyres stored at the facility shall not be more than 50 tonnes
- Parameter 5 All wastes shall be bulked, transferred or treated inside a building, except for specified low-risk waste which may be bulked, transferred or treated outside.
- Parameter 6 Plastic, green waste and wood will be stored externally, on impermeable surfacing  
Storage of "fines" externally will be on impermeable concrete with contained drainage
- Parameter 7 Specified low-risk waste may be stored and treated on hard standing.
- Parameter 8 The only point source discharges to controlled waters or groundwater, are surface water from the roofs of buildings and from areas of the facility not used for the storage or treatment of wastes.
- Parameter 9 The activities shall not be carried out within 500m of a European Site (candidate or Special Area of Conservation, proposed or Special Protection Area or Ramsar site) or a Site of Special Scientific Interest (SSSI);
- Parameter 10 The activities shall not be carried out within 50m of any well, spring or borehole used for the supply of water for human consumption. This must include private water supplies
- Parameter 11 The activities are not carried out predominantly using a limited number of the permitted waste types in a manner which significantly increases any of the risks compared to the generic operation of this type of facility, for example predominantly storing wastes which presents a significant increase in fire risk.

Data and information				Judgement				Action (by permitting)	
Receptor	Source	Harm	Pathway	Probability of exposure	Consequence	Magnitude of risk	Justification for magnitude	Risk management	Residual risk
What is at risk? What do I wish to protect?	What is the agent or process with potential to cause harm?	What are the harmful consequences if things go wrong?	How might the receptor come into contact with the source?	How likely is this contact?	How severe will the consequences be if this occurs?	What is the overall magnitude of the risk?	On what did I base my judgement?	How can I best manage the risk to reduce the magnitude?	What is the magnitude of the risk after management? (This residual risk will be controlled by Compliance Assessment).
Local human population	Releases of particulate matter (dusts) and micro-organisms (bioaerosols).	Harm to human health - respiratory irritation and illness.	Air transport then inhalation.	Low	Medium	Low	Permitted waste types are inert and non hazardous and do not include dusts, powders or loose fibres and have a low potential to produce bioaerosols. Additionally much of the process is internal but the some of activities externally could produce particulate matter so a medium magnitude risk is estimated. The permitted level of throughput means there is potential for exposure if anyone is living or working close to the site (apart from the operator and other employees). There is potential for dust generation from permitted activities during prolonged dry periods e.g. summer months.	Loads will be sheeted, or covered, site carries out regular visual assessments of dust generation, a sweeper is present on site or a bowser (fire engine) deployed. See EMS for the dust management measures, which will be updated as measures evolve.	Negligible

Local human population	As above	Nuisance - dust on cars, clothing etc.	Air transport then deposition	Low	Low	Low	Local residents often sensitive to dust. But residents not in close proximity to this site and no change to risk associated with the SR Permit already in place.	As above	Negligible
Local human population, livestock and wildlife.	Litter	Nuisance, loss of amenity and harm to animal health	Air transport then deposition	Low	Medium	Low	Local residents often sensitive to litter but residents not in close proximity to this site.	As above. Appropriate measures in the EMS include clearing litter arising from the activities from affected areas outside the site.	Negligible
Local human population	Waste, litter and mud on local roads	Nuisance, loss of amenity, road traffic accidents.	Vehicles entering and leaving site.	Low	Medium	Low	Road safety, local residents often sensitive to mud on roads. However the site has a 1km long access road.	As above. Appropriate measures in the EMS include clearing waste, litter and mud arising from the activities from affected areas outside the site.	Negligible
Local human population	Odour	Nuisance, loss of amenity	Air transport then inhalation.	Low	Medium	Low	Local residents often sensitive to odour. But residents not in close proximity to this site.	Wastes accepted unlikely to give rise to odour, no history of odour emission, no change from level of risk in the SR Permit. EMS includes measures should an odour load be received.	Negligible
Local human population	Noise and vibration	Nuisance, loss of amenity, loss of sleep.	Noise through the air and vibration through the ground.	Low	Medium	Low	Local residents often sensitive to noise and vibration, but residents not in close proximity to this site	No change from level of risk in the SR Permit. EMS includes measures for monitoring for any on site noise source that needs attention.	Negligible
Local human population	Scavenging animals and scavenging birds	Harm to human health - from waste carried off site and faeces. Nuisance and loss of amenity.	Air transport and over land	Low	Medium	Low	Permitted wastes may attract scavenging animals and birds. Specified low-risk wastes stored outside may become nesting / breeding sites.	No issues have arisen historically and regular monitoring of the site ensures they do not arise.	Very low
Local human population	Pests (e.g. flies)	Harm to human health, nuisance, loss of amenity	Air transport and over land	Low	Medium	Low	Insect pests can multiply on permitted wastes, particularly in summer months	Access to waste that could attract pests restricted by building, no waste stored for excessive times, regular inspection	Negligible

Local human population and local environment	Flooding of site	If waste is washed off site it may contaminate buildings / gardens / natural habitats downstream.	Flood waters	Low	Medium	Low	Permitted waste types are non-hazardous so any waste washed off site will add to the volume of the local post-flood clean up workload, rather than the hazard.	Location is such that this is extremely low risk and the site is surrounded by a screening bund which limits likelihood even further.	Negligible
Local human population and / or livestock after gaining unauthorised access to the waste operation	All on-site hazards: wastes; machinery and vehicles.	Bodily injury	Direct physical contact	Low	Medium	Low	Permitted waste types are non-hazardous so only a medium magnitude risk is estimated.	Site is remote and includes security measures.	Negligible
Local human population and local environment.	Arson and / or vandalism causing the release of polluting materials to air (smoke or fumes), water or land.	Respiratory irritation, illness and nuisance to local population. Injury to staff, firefighters or arsonists/vandals. Pollution of water or land.	Air transport of smoke. Spillages and contaminated firewater by direct run-off from site and via surface water drains and ditches.	Low	Medium	Low	Permitted waste types do not include sludges or liquids and are non-hazardous so only a medium magnitude risk is estimated.	As above. Fire Prevention plan in place	Low
Local human population and local environment	Accidental fire causing the release of polluting materials to air (smoke or fumes), water or land.	Respiratory irritation, illness and nuisance to local population. Injury to staff or firefighters. Pollution of water or land.	As above.	Medium	Medium	Medium	Risk of accidental combustion of waste is moderate.	As above. Fire Prevention plan in place	Low

All surface waters close to and downstream of site.	Spillage of liquids, leachate from waste, contaminated rainwater run-off from waste e.g. containing suspended solids.	Acute effects: oxygen depletion, fish kill and algal blooms	Direct run-off from site across ground surface, via surface water drains, ditches etc.	Low	Medium	Low	Permitted waste types do not include sludges or liquids so less mobile and only a low magnitude risk is estimated. There is potential for contaminated rainwater run-off from wastes stored outside buildings especially during heavy rain however the history of external storage shows they also absorb significant amounts of the rainfall.	All liquids shall be provided with secondary containment.... (applies to non- wastes such as fuels). The distance to streams or rivers is considerable, the site is bounded on its perimeter. The waste types stored outside absorb water falling on them.	Low
All surface waters close to and downstream of site.	As above	Chronic effects: deterioration of water quality	As above. Indirect run-off via the soil layer	Medium	Low	Low	Waste types are non-hazardous so harm is likely to be temporary and reversible.	As above	Low
Abstraction from watercourse downstream of facility (for agricultural or potable use).	As above	Acute effects, closure of abstraction intakes.	Direct run-off from site across ground surface, via surface water drains, ditches etc. then abstraction.	Medium	Medium	Low	Watercourse must have medium / high flow for abstraction to be permitted, which will dilute contaminated run-off.	As above. Also the activities are not carried out within 50m of any well, spring or borehole used for the supply of water for human consumption.	Low
Groundwater	As above	Chronic effects: contamination of groundwater, requiring treatment of water or closure of borehole.	Transport through soil/groundwater then extraction at borehole.	Medium	Medium	Medium	There is a potential for contaminated rainwater run-off or leachate from permitted waste types.	As above, or within 50m of any well, spring or borehole used for the supply of water for human consumption. Impermeable surfacing used for storage of all wastes other than inert. Limited quantities and limited storage times dictated by the FPP mean likelihood of potentially contaminated run off reduced.	Low
Local human population	Contaminated waters used for recreational purposes	Harm to human health - skin damage or gastrointestinal illness.	Direct contact or ingestion	Low	Medium	Low	Unlikely to occur, no recreational waters in locality.	As above.	Very low

Protected sites - European sites and SSSIs	Any	Harm to protected site through toxic contamination, nutrient enrichment, smothering, disturbance, predation etc.	Any	Low	Medium	Low	Waste operations may cause harm to and deterioration of nature conservation sites.	There are no designated sites within >1000m of the site	Negligible
Local human population and all surface waters close to and downstream of site.	Serious Fire	Nuisance, harm to human health, loss of amenity, deterioration of water quality	Air transport then inhalation or deposition. Direct run off of fire water across site to surface waters.	Low	Low	Low	Measures in place, remoteness of the site from residences or other sensitive receptors	Fire Prevention Plan which will limit storage times of waste and storage quantities of the potentially flammable wastes.	Low
All surface waters close to and downstream of site.	Serious Fire	Loss of amenity, deterioration of water quality	Direct run off of fire water across site to surface waters.	Low	High	Low	Measures in place, remoteness of the site from water courses or other sensitive receptors	Fire Prevention Plan which will limit storage times of waste and storage quantities of the potentially flammable wastes. Bunding in place around the site	Low

**Habitats Search**

The Pre-application advice received from the EA confirmed: *I carried out a bespoke conservation, nature and heritage screening centred on ST 84928 93369, buffer of 140m, no results were identified.*

The ERA has further expanded this to 1000m and no habitats have been identified – see extract below from MAGIC



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### **Environmental Risk Assessment**

This has been addressed above utilising the generic ERA for the appropriate Standard Rules as the pre-app response was not clear how the increased tonnage should be dealt with under ERA, even though as noted it is a relatively small amount on a daily basis and within the fluctuations the site normally experiences. An additional waste code is proposed to be added, 19 12 12 for material that has been bulked at a transfer station, where it may have had rudimentary treatment. This will to all purposes be simply “skip” waste, but the additional code will ensure it is appropriately coded for receipt at Valley Trading. No increased risk arises as it mirrors the existing operations fully and is a technicality that the code is required.

### **Fire Prevention Plan**

A Fire Prevention Plan to the current guidance is provided with this. This has been produced by a consultant experienced in the production of FPPs, in consultation with Valley Trading and brings the understanding of having discussed the EA’s requirements on FPPs across operations of many types and scales.

### **Odour**

An odour management plan has not been provided with this variation application. The preapplication advice, whilst directing to the guidance at <https://www.gov.uk/guidance/control-and-monitor-emissions-for-your-environmental-permit#odour> also noted: *if you feel that an odour management plan is not required and measures contained within a risk assessment will suffice, you must provide a robust justification for not including one in your application when it is submitted.*

The current ERA for SR2015 No6 notes that odour will be controlled, and makes no requirement for an OMP, even though the operations under that SR can be carried out with no restriction on their proximity to a sensitive receptor. They may be within a building, but as noted in the EMS, Valley Trading utilises a building for reception of all non inert wastes, therefore any potentially odorous wastes will be detected and dealt with within the building in the first instance.

At Babdown Airfield there are no sensitive receptors within 500m, as confirmed in the pre-app search.

The site has no history of odour issues or complaints, and this variation back to a bespoke Permit does not change any of the activities that have been historically undertaken, therefore the variation does not give rise to any increased risk of odour.



The waste types (whilst broad within the Permit are generally “skip waste”) do not include any significant amount of biodegradable materials that could give rise to odour.

Initial sorting and assessment of wastes is within a building and anything noted as potential to give rise to odour off site is removed at that time for appropriate management off site.

The wastes which are stored externally are primarily inert materials that do not give rise to odour.

The variation seeks to regularise the external storage of green waste, wood and plastics and does not increase the risk of odour causing impact at sensitive receptors. It has already been occurring without incident or complaint, but the Fire Prevention Plan will now restrict the amounts and the storage times, thereby even further reducing the risk of odour arising.

For the reasons noted above, and based on an assessment of risk and likelihood, rather than simple waste types or proximity it is considered that no OMP is required in relation to the variation sought. However it is noted that as a bespoke Permit the EA has the ability to include a condition similar to that on the current SR permit which would trigger the need for an OMP should the activities give rise to pollution outside the site due to odour.

#### Habitats

The pre-app response provided confirmation that, within the distance identified by the EA as suitable, no habitats were identified. The ERA has further expanded this to 1000m and no habitats have been identified.

#### Dust and Noise Emissions Plans

A specific dust emissions plan or noise emissions are not included although dust and noise management measures are included in the EMS for the site. These are the measures which have been utilised previously and the site has not given rise to any dust or noise complaints and therefore are deemed to be effective. Additionally the site is removed from any sensitive receptors as noted in the Pre-app response. Current guidance on .gov.uk notes ( in relation to dust, but equally applicable to noise) : *If your risk assessment shows you have a risk of these types of emissions you may need to provide an emissions management plan when you apply for your permit to demonstrate how you'll control them.*

The risk assessment confirms, in line with the SR risk assessment for the Permit already in place, and as no additional operation likely to give risk to dust or noise will occur as a result of this

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variation, the risk of dust or noise emission is low, therefore in line with the SR for the same operations, no specific dust or noise management plans are required.