ENVIRONMENTAL RISK ASSESSMENT

Unit 18, Thorn Business Park, Rotherwas Industrial Estate, Rotherwas, Hereford, HR2 6JT

Chapel Road Enterprise Ltd

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Oaktree Environmental Ltd

Waste, Planning & Environmental Consultants

Oaktree Environmental Ltd, Lime House, 2 Road Two, Winsford, Cheshire, CW7 3QZ
Tel: 01606 558833 | E-Mail: sales@oaktree-environmental.co.uk | Web: www.oaktree-environmental.co.uk
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1.1	14/11/2025	EG	--	EA comments

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Drawing No. TBP/3361/04 – Receptor Plan

1 Introduction

1.1 Note

1.1.1 Oaktree Environmental Ltd have been instructed by Chapel Road Enterprise Ltd (the Operator) to prepare this Environmental Risk Assessment (ERA) to support an Environmental Permit variation application at Unit 18, Thorn Business Park, Rotherwas Industrial Estate, Rotherwas, Hereford, HR2 6JT the existing permit authorises a household, commercial and industrial waste transfer station with treatment facility. Treatment activities at the site include:

a) Sorting (with loading shovel/360^{o} excavator or by hand).
b) Manual separation (by picking line).
c) Screening (by using appropriate mechanical screening plant and equipment).
d) Shredding (by using appropriate mechanical plant and equipment).

1.1.2 This ERA has been prepared to support an Environmental Permit variation application in relation to the following:

a) Update the permit to a modern format.
b) Authorise the external storage and treatment of non-specified waste.
c) Include shredding as a waste treatment operation. Only wood and green waste will be shredded under this treatment operation.

1.1.3 This ERA considers the potential and actual risks associated with the proposed changes (listed in point 1.1.3 above). This ERA does not aim to provide detailed Health and Safety risk assessments as required separately through the necessary legislation.

1.1.4 All site staff should be provided with a copy of this ERA and be aware of where it is located on site.

1.1.5 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.

2 Site Location and Receptors

2.1 Site Location

2.1.1 The site is located at Unit 18, Thorn Business Park, Rotherwas Industrial Estate, Rotherwas, Hereford, HR2 6JT The National Grid Reference (NGR) SO 52648 38142 and is accessed via Thorn Business Park.

2.1.2 Land use surrounding the site is predominantly industrial comprising of the wider Rotherwas Industrial Estate and Thorn Business Park with areas of residential dwellings beyond the industrial estate.

2.2 Sensitive Receptors

2.2.1 Sensitive receptors within 1km of the site are illustrated on Drawing No. TBP/3361/04 Receptor Plan, see Appendix II.

2.2.2 Table 2.1 shows the approximate distance and orientation of sensitive receptors from the site.

Table 2.1 Sensitive Receptors

Receptor	Direction from Site	Approx distance from the site boundary to the receptor boundary (m)
Commercial / Industrial		
Thorn Business Park	South	0
Rotherwas Industrial Estate	South	0
HTS Plant Sales	West	10
Excalibur Sports	West	10
SIG Roofing Hereford	West	10
Keltruck Limited	South	20
Sewage Treatment Works	West	280
Welsh Water (Rotherwas wastewater treatment works)	East	570
Residential Dwellings		
Rotherwas Close	Southwest	130
Hampton Park Road (B4224)	North	445
Care homes (residential)		
Gwen Walford Nursing Home	Northeast	550
Hampton Grange Nursing Home	Northeast	580
Aston House (assisted living)	Northeast	655
Brockington House Care Home	North	885
Schools		
Lakeview Nursery	South	210
Beech House Nursery School	North	590
Watercourses / Surface Water Features		
Pond	East	25
River Wye	West	135
Infrastructure (major roads and transport links)		
Transport for Wales Railway Line	West	40
Canary Bridge (footbridge)	Northwest	520
Ecological Sites		
River Wye (SSSI & SAC)	West	135
Recreational / Tourist Attractions		
Sustrans Portrait Bench	Northwest	240

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
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 near-zero, 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

Appendix I

RISK ASSESSMENT TABLES

Hazard / Potential Contaminant or Situation	Source(s)	Pathway	Receptor(s)	Consequences	Effect	Probability	Assessment Outcome	Remedial Action/ Recommendations/ Comments
Dust / particulates	Release of dust via one of the following channels: Waste delivery vehicles deposit and collecting potentially dusty waste during dry and windy weather conditions. Storage of potentially dusty/waste material externally. Processing of waste (screening, shredding) externally. Dust / debris on site surfaces. Loading of waste into treatment plant. Wastes dropping from conveyors into stockpiles Prolonged periods of dry/warm weather or conditions where winds reach 4+ on the Beaufort Wind Scale Particulate emissions from the exhaust of vehicles / plant /generators and other non-road going machinery on site Additional waste streams proposed comprising of EWC code 10 01 03	Air	Local human population, including industrial units, neighbouring businesses, residential dwellings and surface water features, specifically: • Site workers and visitors. • Rotherwas Industrial estate and its users. • Thorn Business Park and its users. • Residential dwellings situated on Rotherwas Close. • River Wye	Harm to human health – respiratory irritation and illness A, B, D, E	Mo	3	Low	The operator is already permitted to undertake mechanical treatment including screening of inert materials which have the potential to produce dust. There have been no complaints of dust from these operations undertaken, therefore it is considered the dust suppression currently implemented has been considered effective. The proposed external storage of waste non-specified waste and the shredding of wood / green waste have the potential to increase the risk of dust being emitted off site. The Operator will continue to implement the following to minimise the risk of dust from the site: • Strict waste acceptance procedures are implemented to ensure that loads comprising mainly dust, powders or loose fibres are not accepted on site. • All vehicles delivering and exporting waste will be sheeted. • Drop heights will be minimized as far as reasonably practicable. • Hoses, mains water and water storage tanks will be utilised to dampen stockpiles and site surfaces. • Potentially dusty waste that has been stockpiled will be dampened regularly in dry and windy conditions. This reduces the amount of dust which could be suspended and therefore the amount of dust that has the potential to extend beyond the permit boundary. • Prior to the secondary screening/trommel processing waste if required loads will be dampened down before being put into the plant hopper for processing to minimise the potential for dust emissions. This will not be done for every load to undergo processing through the secondary screening/trommel processes and will be determined on an individual basis with factors such as external weather conditions being considered. • The shredder is fitted with dust suppression. No shredding will take place unless the spray bars are operational and functioning correctly.

Hazard / Potential Contaminant or Situation	Source(s)	Pathway	Receptor(s)	Consequences	Effect	Probability	Assessment Outcome	Remedial Action/ Recommendations/ Comments
								• Above the waste transfer building entrance there are mistair fans / sprinklers which are fed by mains water to provide sufficient and constant pressure. • Hoses can be utilised to wash the wheels of vehicles leaving the site to remove any mud, dust or debris and minimise the risk of mud on surrounding roads. • In the event of mud being tracked off site and onto the main roads it will be treated as an emergency and cleaned by site operatives using manual techniques or if required the operator will organise for a road sweeper to be deployed. • Site operatives will continuously monitor dust emissions whilst the site is in operation and will report back to the site manager for advice if required. The site manager will make a formal visual inspection of dust emissions at least twice per day when operations with the highest dust potential are being undertaken. Results of monitoring will be recorded in the site diary/record forms. • The requirements of a Dust Management Plan (DMP) are implemented on site. The DMP outlines all mitigation measures to be implemented on site and what to do in the event of dust extending beyond the permit boundary. • The additional EWC code proposed (10 01 03) is not considered to have an increased risk than those waste types currently accepted and processed on site.

Hazard / Potential Contaminant or Situation	Source(s)	Pathway	Receptor(s)	Consequences	Effect	Probability	Assessment Outcome	Remedial Action/ Recommendations/ Comments
Odour	Biodegradable waste stored on site. Cracks in impermeable concrete pad leading to trapped waste. Dry and hot weather conditions exceeding three days. Prevailing wind towards residential receptor locations transporting odour. Staff negligence leading to odour releases from unauthorised waste.	Air transport then inhalation	Local human population, including industrial units, neighboring businesses, and residential dwellings, specifically: • Site workers and visitors. • Rotherwas Industrial estate and its users. • Thorn Business Park and its users. • Residential dwellings situated on Rotherwas Close	A, D	Mi to Mo	3	Low	There are no proposed changes to the waste types currently accepted. The variation proposes to store waste externally which increases the potential for odour to be detected by nearby receptors. The Operator will implement the following to minimise the risk of dust from the site: • Strict waste acceptance procedures are implemented to ensure that no malodorous waste is accepted. • Any wastes discovered to be malodorous following acceptance / deposit into the waste reception area will be quarantined and removed from site as soon as practicable. • Putrescible waste that has the potential to be odorous will be stored on site for a maximum of five days, waste is typically removed from site within two days however, five days is provided to allow for contingency (delays in vehicles, plant and equipment breakdowns etc.). If any waste stored on site begins to give rise to odour that can be detected off site will be removed as soon as possible. • Good housekeeping measures are actively maintained on site to reduce the risk of odour. • Site operatives will be sufficiently trained and undergo continuous training on identifying odorous wastes or non-conforming wastes that could give rise to odour. • The condition of the impermeable pad will be checked on a weekly basis to ensure there are no cracks that could lead to trapped waste and developing odour. • The requirements of an odour management plan (OMP) are implanted on site. The OMP outlines all mitigation measures to be implemented on site and what to do in the event of odour detection outside the permit boundary.
Waste, litter and mud on local roads	Litter escaping the site boundary (windblown). Vehicles delivering / removing waste including unsheeted / poorly sheeted skips.	Vehicles entering and leaving the site. Air transport (windblown)	Local human population, including adjacent commercial / industrial units, other neighboring businesses, and surrounding transport infrastructure, specifically:	A to C E & F	Mi to Mo	3	Low	The greatest risk of litter would be during windy conditions. The variation proposes to store waste externally which increases the potential for litter to be windblown off site. The Operator will implement the following to minimise the risk of litter escaping the permit boundary: • The site will be operated to a lesser degree during these conditions giving due regard to the potential effects of windblown litter.

Hazard / Potential Contaminant or Situation	Source(s)	Pathway	Receptor(s)	Consequences	Effect	Probability	Assessment Outcome	Remedial Action/ Recommendations/ Comments
	Poor or faulty storage containment. Poor housekeeping. Staff negligence leading to litter escaping off site		• Site workers and visitors. • Rotherwas Industrial estate and its users. • Thorn Business Park and its users. • Residential dwellings situated on Rotherwas Close. • Transport for Wales Railway Line					• Site inspections including litter checks will take place on a regular basis to identify and remove any litter from the site. • Waste stored in bays is stored with a freeboard of 1m to prevent waste escaping the bay or becoming wind whipped. • Good housekeeping measures are actively maintained on site to reduce the risk of litter. • Vehicles leaving the site will be sheeted and if required will undergo wheel washing to prevent mud being tracked onto the local highway. In the event of mud being tracked off site and onto the main roads it will be treated as an emergency and cleaned by site operatives using manual techniques or if required the operator will organise for a road sweeper to be deployed. • Areas of the permit boundary where shredding takes place and light wastes are stored have litter netting above the perimeter walls to capture any litter that has become windblown and prevent it escaping the permit boundary.
Noise/ vibration	Plant and machinery breakdowns or malfunctions. Tipping / loading of waste. Operating mechanical treatment plants in external areas of the site i.e. Shredder, crusher.	Noise through the air or vibration through the ground	Local human population, including industrial units, neighboring businesses, and residential dwellings and surface water features, specifically: • Site workers and visitors. • Lidun Park Industrial estate and its users. • Residential dwellings on Cheviot Avenue.	A, D	Mo	3	Low	It was confirmed by the Environment Agency during enhanced pre-application advice no noise management plan / impact assessment is required. There have been no complaints relating to noise received from operations undertaken at the site. It is not considered that the external storage of waste or shredding of wood / green waste will increase the risk of noise being detected off site. Therefore, the operator will continue to implement the following: • A 5mph speed limit is enforced on site. • All plant and equipment will be maintained in accordance with the manufacturers' recommendations to keep plant and equipment functioning correctly and minimise noise generation. • Plant and equipment will only be operated when necessary. Shredding will typically only take place a few days a week for a few hours each day.

Hazard / Potential Contaminant or Situation	Source(s)	Pathway	Receptor(s)	Consequences	Effect	Probability	Assessment Outcome	Remedial Action/ Recommendations/ Comments
								• Pre-use checks are undertaken prior to using plant or equipment. Defects are reported and actions taken to rectify the problem. • Engines will be switched off when not in use. No plant, equipment or vehicles will be left idling. • Drop heights of materials will be reduced as far as practicable.
Vermin causing leptospirosis and other respiratory diseases	Poor housekeeping. Staff negligence leading to acceptance of unauthorised waste giving rise to pests. Storing waste for excessive time periods.	Water, direct contact with waste	Local human population, including users of adjacent commercial / industrial units, other neighbouring businesses, residential dwellings and surface water features, specifically: • Site workers and visitors. • Rotherwas Industrial estate and its users. • Thorn Business Park and its users. • Residential dwellings situated on Rotherwas Close. • River Wye.	A to C	Mi to Mo	4	Negligible	There are no proposed changes to the waste types accepted at the site as part of this variation. Therefore, it is considered there is no increased risk of attracting vermin. The operator implements the following: • Strict waste acceptance procedures are implemented to ensure no food waste or waste that could attract vermin are accepted. • Mixed municipal waste (EWC code 20 03 01) can be accepted at the site. Once a load has been tipped, if any waste that could give rise to pests such as food waste is detected it will be segregated in the quarantine area and removed from site as soon as practicable. • Good housekeeping measures are actively maintained to reduce the potential of attracting pests. Housekeeping inspections take place daily at the end of each working day to collect any waste produced by on-site operatives. • An appropriate pest controller will be called in the event of pests being present at the site or complaints received relating to pests.
Fire/ smoke / particulates	Plant failure Combustible waste types Arson and or vandalism Staff negligence Discarded smoking materials	Air transport of smoke	Local human population, including industrial units, neighboring businesses, and residential dwellings and surface water features, specifically: • Site workers and visitors.	A to F	Mi to S	3	Medium	There are no proposed changes to the EWC codes or waste types accepted at the site. The waste types currently accepted consist of combustible waste which has the potential for a fire. Therefore, the operator implements the following: • Strict waste acceptance procedures are implemented to reduce the likelihood of non-conforming waste being accepted.

Hazard / Potential Contaminant or Situation	Source(s)	Pathway	Receptor(s)	Consequences	Effect	Probability	Assessment Outcome	Remedial Action/ Recommendations/ Comments
	Hot exhausts Industrial heating Build up of loose combustible waste, dust and fluff Hot loads Leaks and spillages of oil and fuel		• Rotherwas Industrial estate and its users. • Thorn Business Park and its users. • Residential dwellings situated on Rotherwas Close. • River Wye					• Combustible waste will be stored in accordance with the Environment Agencies Fire Prevention Plan guidance. Storage times and quantities will be significantly less than those in the guidance. • 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 6m outside the permit boundary within the designated smoking area • 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, including lockable gates that remain locked outside of operational hours, CCTV monitored by a third party security company out of operational hours. • Flame detection systems above combustible waste storage areas. • The requirements of a Fire Prevention Plan (FPP) are implemented on site. • Inspections are undertaken of waste storage areas to ensure 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.

Hazard / Potential Contaminant or Situation	Source(s)	Pathway	Receptor(s)	Consequences	Effect	Probability	Assessment Outcome	Remedial Action/ Recommendations/ Comments
Vehicle collision/ accidents including impacts and injury	Poor visibility Spillages of oils/fluids causing vehicles to skid. Lack of PPE worn by staff. Staff negligence i.e. mobile plant operators. Excessive waste storage causing collapse of stored materials / falling materials and reducing accessibility around the site.	Direct contact	Visitors to the site and workers employed by the operator. Pedestrians	A to F	Mi to S	3	Low	There are no proposed changes to the throughput of waste and therefore it is not anticipated there will be an increase in vehicles delivering waste to the site. The operator will continue to implement the following: • Ensure all free-standing waste storage areas are in the correct locations and access areas are kept clear as shown on Drawing No. TBP/3361/03 Site Layout & Fire Plan. • An accident logbook is kept in the site office so all new and existing staff members can review previous accidents. • Appropriate signage throughout the site. • All staff have radios and use horns / alarms on equipment to alert them of their presence. The operator has trained staff who control vehicle movements throughout the site. • Vehicle movements on site are restricted to 5mph.
Leachate	Poor housekeeping Staff negligence leading to acceptance of unauthorised waste giving rise to leachate Overflowing waste storage skips Water through ground from mobile dust suppression and rainwater	Ground	Surface water features and areas of sensitive ground, specifically: • River Wye	E, F	Mi to S	3	Low	• HCI waste is stored on an impermeable concrete pad with sealed drainage. • 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 the quarantine skip/area. • The FPP has a dedicated section on firewater containment measures.

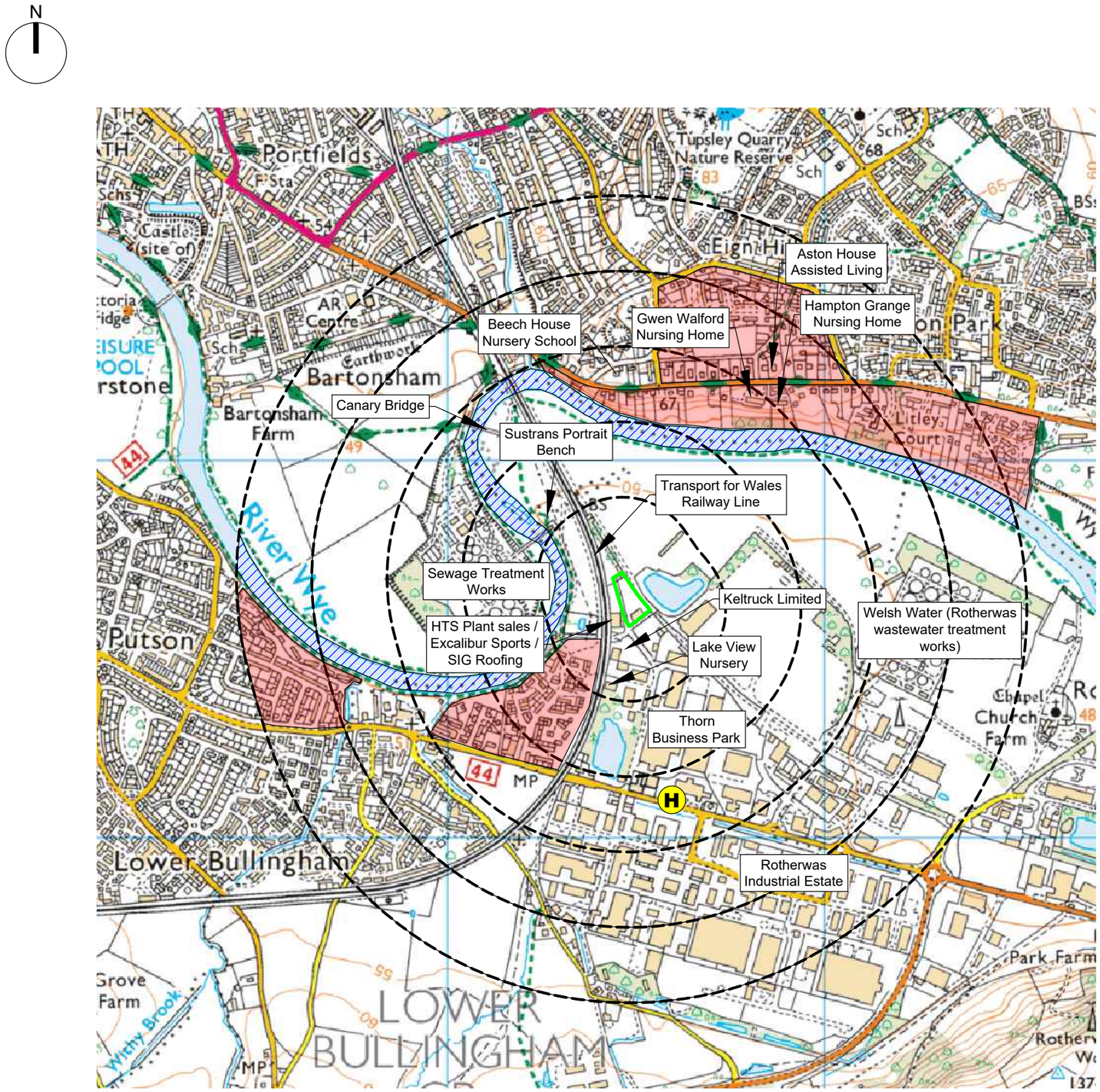
Hazard / Potential Contaminant or Situation	Source(s)	Pathway	Receptor(s)	Consequences	Effect	Probability	Assessment Outcome	Remedial Action/ Recommendations/ Comments
Hydrocarbons including release of gases/fumes/ vapours/ volatiles	Spills from fuel tanks Drips when refueling During delivery Leakage from stored drums Fixed and mobile plant malfunction Mixing of waste/ chemicals Spillage of chemicals Overturned vehicle plant/plant failure Reaction between stored wastes	Ground - direct contact, ingestion Inhalation (of volatiles)	Local human population, including industrial units, neighboring businesses, and residential dwellings and surface water features, specifically: • Site workers and visitors. • Rotherwas Industrial estate and its users. • Thorn Business Park and its users. • Residential dwellings situated on Rotherwas Close.	A, B, D, E, F	Mi to S	3	Low	• There are no proposed changes to waste types accepted at the site and therefore an increased risk of hydrocarbons is considered negligible. • Where plant is operated, spill kits will be available to ensure that any fuel spillages are cleared. • All site surfaces will be inspected daily for the presence of spillage 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. • An impermeable pad with sealed drainage system will reduce the impacts of any spills. • Very little potential for hydrocarbons to be released from site given the waste types accepted and stored i.e. no ELVs. • No gas is stored on site.

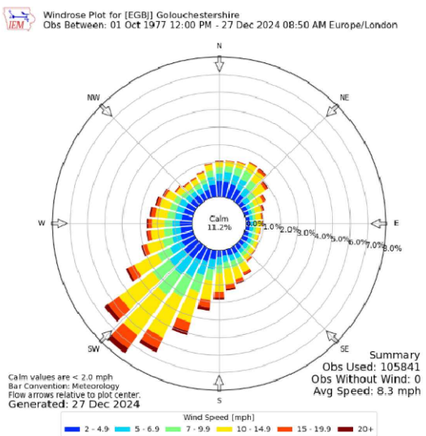
Appendix II

Drawings

KEY:

- Permit boundary
- Surface water body (river / stream / pond / pool / lake)
- Areas with mix of residential, retail and commercial properties
- Residential blocks
- Class A roads
- Class B roads
- Class C roads
- Nearest fire hydrant
- Railway line
- Woodland areas
- River Wye SSSI / SAC





Compass Wind Rose for Gloucestershire
Period 1977-2024
- source: Iowa State University

Scale Bar (1:12,500)
0 100 200 300 400 500m

NOTES

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

REVISION HISTORY

Rev:	Date:	Init:	Description:
-	21.02.25	EG	Initial drawing

KEY:

- Permit boundary

TITLE: RECEPTOR PLAN

CLIENT: Chapel Road Enterprise Ltd

PROJECT/SITE: Unit 18, Thorn Business Park, Rotherwas Industrial Estate. Rotherwas, Hereford, HR2 6JT

SCALE @ A3:	CLIENT NO:	JOB NO:
1:12,500	3361	008

DRAWING NO:	REV:	STATUS:
TBP-3361-04	-	Issued

DATE:	DRAWN:	CHECKED:
21.02.25	EG	CP

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Waste, Planning & Environmental Consultants