



**AN APPLICATION TO VARY ENVIRONMENTAL  
PERMIT NUMBER EPR/GB3003GR FOR THE INERT  
AND EXCAVATION WASTE TRANSFER STATION  
OPERATED BY DB CARGO (UK) LIMITED AT BARKING  
EUROHUB, BOX LANE, RENWICK ROAD, BARKING TO  
PROVIDE FOR CHANGES TO THE WASTE TYPES  
ACCEPTED AT THE SITE**

**ENVIRONMENTAL RISK ASSESSMENT FOR  
NUISANCE AND AMENITY (ERA)**

Report reference: Document Reference/ERA  
April 2023

VERSION 1.1

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This report has been prepared by MJCA with all reasonable skill, care and diligence, and taking account of the Services and the Terms agreed between MJCA and the Client. This report is confidential to the client and MJCA accepts no responsibility whatsoever to third parties to whom this report, or any part thereof, is made known, unless formally agreed by MJCA beforehand. Any such party relies upon the report at their own risk.

## 1. Introduction

- 1.1** MJCA is commissioned by DB Cargo (UK) Limited (DB Cargo) to prepare an application to vary Environmental Permit number EPR/GB3003GR (the permit) for the inert and excavation waste transfer station operated by DB Cargo at Barking Eurohub, Box Lane, Renwick Road, Barking (the site) to provide for changes to the waste types accepted at the site. The site, which has been operational since July 2018, is currently permitted to accept up to 750,000 tonnes of inert and excavation waste per year under a bespoke permit issued on 16 February 2021. Waste is received by road and transferred from the site by rail. It is understood that the Environment Agency have received no complaints in respect of dust, particulate matter, mud on the road, noise or odour emissions from the site since the permit was first issued in July 2018 and no non compliances have been identified by the Environment Agency in respect of the permit during site inspection visits undertaken since the permit was first issued.
- 1.2** The assessment of the environmental risks associated with the current activities at the site were the subject of an environmental risk assessment<sup>1</sup> submitted with the previous application to vary the permit.
- 1.3** The proposed changes to the permit which are the subject of this variation application comprise:
- A. To add to Table S2.1 of the permit List of Waste (LoW) codes 19 12 12 and 19 13 02. It is proposed that these waste types will be stored in the northern half of the currently permitted area adjacent to, but segregated from, soil and stones waste categorised under LoW code 17 05 04 currently authorised to be accepted at the site. The area in which it is proposed that LoW codes 19 12 12 and 19 13 02 will be stored is marked on Figure ERA 1. LoW codes 19 12 12 and 19 13 02 will be stored on an impermeable surface with sealed drainage. Further details of these waste types are presented in the application report.
  - B. To add a range of metal wastes specified under LoW Chapters 02, 12, 16, 17, 19 and 20 to Table S2.1 of the permit. The metal waste types to be added to

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<sup>1</sup> Report reference DBC/EU/AW/5636/01/ERA dated September 2020.

the permit are all specified in Standard Rules Permit SR2009No7: storage of furnace ready scrap metal for recovery. Loose tipped metal wastes will be stored exclusively in the area to the south of the currently permitted area marked on Figure ERA 1. This area of the site currently operates a similar activity under a T9 waste exemption for the storage and recovery of scrap metal. Once the varied permit has been issued it is proposed that the T9 exemption will be deregistered. The storage and transfer operations will then be subject to the permit rather than the T9 exemption.

C. To extend the Environmental Permit boundary to the west (see Figure ERA 1).

- 1.4** Table 1 provided in the application report presents the full LoW codes that it is proposed will be added to the permit. There are no proposals to increase the overall annual tonnage limit at the site or to include waste activities at the site additional to those already consented. There are no proposals to undertake the mechanical treatment of waste at the site. The activities it is proposed are undertaken at the site remain consistent with those specified in Table S1.1 of the permit. Consistent with the current waste operation, waste will continue to be received at the site by road and will be transferred from the site by rail.
- 1.5** This document comprises a nuisance and amenity Environmental Risk Assessment (ERA) prepared generally in accordance with Environment Agency guidance entitled 'Risk assessments for your environmental permit' published on GOV.UK<sup>2</sup>. A risk screening matrix is provided in Table ERA 1 and the assessment is presented in Table ERA 2.
- 1.6** The ERA considers potential receptors and pathways for impacts based on the understanding of the environment surrounding the site. The assessment of the risks associated with the site are based on the currently permitted activities taking into account the proposed additional waste types listed in Table 1 of the application report.
- 1.7** The selection of potential receptors has been informed by information presented on the Defra MAGIC website and Google Earth. The risk assessment takes into consideration receptors within 500m of the site with the exception of statutorily

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<sup>2</sup> <https://www.gov.uk/guidance/risk-assessments-for-your-environmental-permit> Published 1 February 2016 Last updated 18 February 2020.

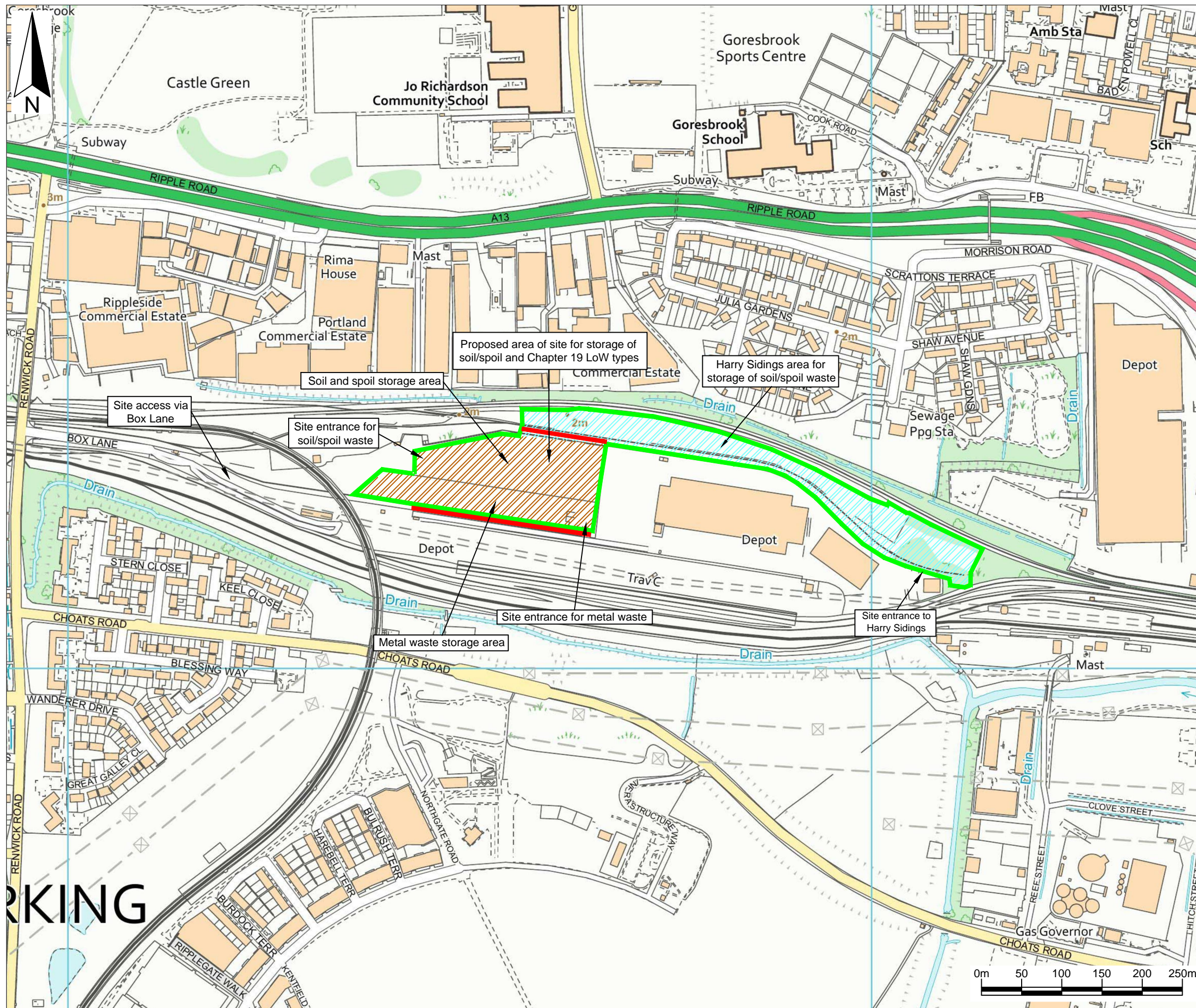
designated nature conservation sites for which a distance of up to 2km has been specified.

- 1.8** Based on information on the Defra MAGIC website there are no Sites of Special Scientific Interest (SSSI), Ramsar Sites, Special Protection Areas (SPA), Special Areas of Conservation (SACs) or National Nature Reserves (NNRs) located within 2km of the site. Based on the information available on MAGIC no World Heritage Sites, Scheduled Monuments or Listed Buildings are located within 500m of the site.
- 1.9** Table S1.2 of the permit specifies Dust and Particulate Matter Emission Management Plan (DEMP) Version 1.1 dated January 2021 as an operating technique. An updated version of the DEMP (Version 1.2) has been prepared to address the potential for the additional waste types to generate and release dust and provides details of the operational controls employed at the site to mitigate the risk of impacts to the surrounding environment. DEMP Version 1.2 is presented at Appendix D of the application. The DEMP provides further details of the receptors in the vicinity of the site.

## 2. Conclusion

- 2.1 The ERA presented in Table ERA 2 that has been completed to support the application to vary the permit demonstrates that the operation of the facility with the implemented controls has a low or very low risk of adverse impact on amenity or the surrounding environment including sites of nature conservation interest.

**FIGURES**



**Key / Notes**

- Environmental Permit boundary
- Tarmac surface
- Hardstanding surface
- Train loading area

Rev	Status	Drn	App	Chk	Date
	Final	KR	AW	LH	21/04/23
A	Minor amendments	KR	AW	LH	18/04/23
	Final	KR	LBA	AW	07/01/22

Site  
EUROHUB BARKING

Client  
DB CARGO (UK) LIMITED

Title  
Site surfacing and activity areas

Figure ERA 1      Scale  
1:5,000@A3

Drawing Ref  
DBC/EU/12-21/22907revA

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TABLES

Table ERA 1 - Risk screening matrix (waste transfer station)

RISK TYPE	ODOUR		NOISE AND VIBRATION		FUGITIVE EMISSIONS								
					PARTICULATE MATTER				LITTER		BIRDS, VERMIN AND INSECTS		MUD ON THE ROAD
GENERIC HAZARDS	Waste storage and handling	Waste delivery	Waste delivery	Waste storage and handling	Waste delivery	Waste storage and handling	Site surfacing	Access routes	Waste delivery	Waste storage and handling	Waste delivery	Waste deposition	Vehicle Movements
GENERIC RECEPTORS <sup>1</sup>													
DOMESTIC DWELLING			X	X	X	X	X	X					
SCHOOLS AND COLLEGES			X	X	X	X	X	X					
HOSPITALS													
OFFICES / COMMERCIAL PREMISES			X	X	X	X	X	X					
INDUSTRIAL PREMISES			X	X	X	X	X	X					
PUBLIC FOOTPATH OR BRIDLEWAY			X	X	X	X	X	X					
HIGHWAYS OR ROADS					X	X	X	X					X
PARKS AND PUBLIC OPEN SPACES			X	X	X	X	X	X					
FARMLAND WITH LIVESTOCK													
FARMLAND ARABLE													
PRIORITY HABITAT			X	X	X	X	X	X					
NATURE SITE OF LOCAL IMPORTANCE (e.g. LNR, CWS)			X	X	X	X	X	X					

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RISK TYPE	ODOUR		NOISE AND VIBRATION		FUGITIVE EMISSIONS								
					PARTICULATE MATTER				LITTER		BIRDS, VERMIN AND INSECTS		MUD ON THE ROAD
GENERIC HAZARDS  GENERIC RECEPTORS <sup>1</sup>	Waste storage and handling	Waste delivery	Waste delivery	Waste storage and handling	Waste delivery	Waste storage and handling	Restored surfaces	Access routes	Waste delivery	Waste storage and handling	Waste delivery	Waste deposition	Vehicle Movements
SITE OF SPECIAL SCIENTIFIC INTEREST (within 2km)													
SPECIAL AREA OF CONSERVATION (within 2km)													
SPECIAL PROTECTION AREA OR OTHER RELEVANT SSSI (within 2km)													
LISTED BUILDINGS (within 500m)													
SCHEDULED MONUMENT (within 500m)													
AIRPORT													
RAILWAY					X	X	X	X					
SURFACE WATER					X	X	X	X					

X = generic receptor type present and generic hazard considered as part of this assessment. These receptors are listed in Table 1 of the DEMP.

<sup>1</sup> All generic receptors within 500m have been identified unless an alternative distance has been identified.

Table ERA 2 - Assessment of nuisance and amenity risks for the waste transfer station at Barking Eurohub

Sources of the risk			Assessing the risk			Managing the risk	
Hazard	Receptor (ESID)	Pathway	Probability of exposure	Consequence	What is the overall risk?	Risk management	What is the residual risk?
What has the potential to cause harm?	What is at risk? What do I wish to protect?	How can the hazard reach the receptor?	How likely is this contact?	What is the harm that can be caused?	What is the risk? The balance of probability and consequence	What measures will you take to reduce the risk? If it occurs – who is responsible for what?	What is the risk that still remains?
<b>Odour</b>							
Odorous waste	Local human population	Air transport then inhalation	Medium	Nuisance, loss of amenity	Low	<p>The waste types it is proposed are added to the permit generally have a low odour potential. Waste acceptance procedures (WAP) which are already implemented at the site will minimise the risk of unsuitable and contaminated wastes being accepted which may be malodorous. Wastes that are received at the site that are malodorous are and will continue to be rejected. It is understood that there have been no odour complaints at the site since site operations commenced in July 2018.</p> <p>It is proposed that LoW codes 19 12 12 and 19 13 02 are accepted at the site. Wastes accepted under LoW code 19 12 12 will comprise only inert and non-combustible</p>	Low

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What has the potential to cause harm?	What is at risk? What do I wish to protect?	How can the hazard reach the receptor?	How likely is this contact?	What is the harm that can be caused?	What is the risk? The balance of probability and consequence	What measures will you take to reduce the risk? If it occurs – who is responsible for what?	What is the risk that still remains?
						wastes derived from the processing of construction and demolition wastes via segregated waste processing lines at sites that employ active waste segregation practices. DB Cargo will implement thorough waste acceptance procedures and pre-acceptance procedures including audits of the waste processing facilities and regular analyses of waste to be accepted under LoW code 19 12 12. As the source of the 19 12 12 waste will comprise construction and demolition wastes and not commercial and industrial wastes or trommel fines derived from municipal solid waste, the waste accepted under LoW code 19 12 12 will be similar in nature to and will present no greater risk to the environment than the Chapter 17 construction and demolition	

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Hazard	Receptor (ESID)	Pathway	Probability of exposure	Consequence	What is the overall risk?	Risk management	What is the residual risk?
What has the potential to cause harm?	What is at risk? What do I wish to protect?	How can the hazard reach the receptor?	How likely is this contact?	What is the harm that can be caused?	What is the risk? The balance of probability and consequence	What measures will you take to reduce the risk? If it occurs – who is responsible for what?	What is the risk that still remains?
						<p>wastes, including 17 05 04 soil and stones, currently authorised to be accepted at the site. It is considered that the waste accepted under LoW 19 12 12 will have a low potential to generate odour and the waste acceptance procedures implemented at the site will include a visual and olfactory inspection of wastes received at the site and malodorous wastes or wastes with the potential to be malodorous will not be accepted at the site.</p> <p>Wastes accepted under LoW code 19 13 02 will comprise soils from remediation projects and will be similar in nature to the waste currently authorised to be accepted at the site under LoW code 17 05 04 soil and stones. DB Cargo will implement thorough waste</p>	

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What has the potential to cause harm?	What is at risk? What do I wish to protect?	How can the hazard reach the receptor?	How likely is this contact?	What is the harm that can be caused?	What is the risk? The balance of probability and consequence	What measures will you take to reduce the risk? If it occurs – who is responsible for what?	What is the risk that still remains?
						<p>acceptance procedures and pre-acceptance procedures including the review of site investigation documentation and soil remediation proposals and where relevant analyses of the waste to be accepted under LoW code 19 13 02 will be undertaken. Based on the nature of the waste and the control measures in place it is considered that the waste accepted under LoW code 19 13 02 will present no greater risk to the environment in respect of odour than the Chapter 17 construction and demolition wastes currently authorised to be accepted at the site.</p> <p>The metal waste types to be added to the permit are all specified in Standard Rules Permit SR2009No7: storage of furnace</p>	

Table ERA 2 - Assessment of nuisance and amenity risks for the waste transfer station at Barking Eurohub

Sources of the risk			Assessing the risk			Managing the risk	
Hazard	Receptor (ESID)	Pathway	Probability of exposure	Consequence	What is the overall risk?	Risk management	What is the residual risk?
What has the potential to cause harm?	What is at risk? What do I wish to protect?	How can the hazard reach the receptor?	How likely is this contact?	What is the harm that can be caused?	What is the risk? The balance of probability and consequence	What measures will you take to reduce the risk? If it occurs – who is responsible for what?	What is the risk that still remains?
						ready scrap metal for recovery. The Environment Agency Generic Risk Assessment for SR2009No7 (dated 25 June 2012 available on gov.uk) states that the metal waste types have a low odour potential. The WAP implemented at the site include inspection of incoming scrap metal and any malodorous wastes will be rejected. Metal drums or tanks are only accepted at the site if they have a certificate of cleansing or are seen to be clean/empty and there are no odours.	



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What has the potential to cause harm?	What is at risk? What do I wish to protect?	How can the hazard reach the receptor?	How likely is this contact?	What is the harm that can be caused?	What is the risk? The balance of probability and consequence	What measures will you take to reduce the risk? If it occurs – who is responsible for what?	What is the risk that still remains?
<b>Noise and Vibration</b>							
Noise and Vibration from plant operations	Local human population / priority habitats	Noise through the air and vibration through the ground	Medium	Nuisance, loss of amenity, loss of sleep	Medium	The activities undertaken at the site are limited to storage and transfer of waste. No physical treatment activities such as crushing or screening are undertaken at the site. Although it is considered unlikely that the limited activities comprising the unloading of wastes from HGVs and loading of wastes on rail wagons will have a significant environmental impact in respect of noise, a noise impact assessment (NIA) has been undertaken and a noise management plan (NMP) has been prepared based on the findings of the NIA. A copy of the NIA and NMP prepared by Spire Environmental is presented at Appendix F of the application. In the Executive summary of the NIA it is stated:	Low

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What has the potential to cause harm?	What is at risk? What do I wish to protect?	How can the hazard reach the receptor?	How likely is this contact?	What is the harm that can be caused?	What is the risk? The balance of probability and consequence	What measures will you take to reduce the risk? If it occurs – who is responsible for what?	What is the risk that still remains?
						<p><i>“The BS 4142:2014 + A1:2019 assessment indicates that metal tipping and train loading/unloading operations will not exceed the adverse impact threshold of + 5dB at the closest residential properties.</i></p> <p><i>Predicted internal noise levels at the closest residential properties and offices inside the closest industrial premises were within the specified limits in accordance with BS 8233.”</i></p> <p>The NMP will be implemented at the site.</p>	
<b>Fugitive Emissions</b>							
Releases of particulate matter from access routes, waste delivery, waste storage	Local human population / properties / public footpath / public highways /	Air transport then inhalation / deposition	Medium	Harm to human health – respiratory irritation and illness / nuisance – dust on cars, clothing etc.	Medium	The approved Dust and Particulate Matter Emissions Management Plan (DEMP) for the site has been updated to incorporate the additional LoW codes it is proposed are accepted at the site.	Low

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Hazard	Receptor (ESID)	Pathway	Probability of exposure	Consequence	What is the overall risk?	Risk management	What is the residual risk?
What has the potential to cause harm?	What is at risk? What do I wish to protect?	How can the hazard reach the receptor?	How likely is this contact?	What is the harm that can be caused?	What is the risk? The balance of probability and consequence	What measures will you take to reduce the risk? If it occurs – who is responsible for what?	What is the risk that still remains?
and waste deposition	priority habitats / surface water					The DEMP describes the operations at the site which may have the potential to have an impact on air quality as a result of emissions of particulate matter, describes the operational controls which are implemented to minimise emissions and describes the monitoring which is carried out to confirm the effectiveness of the management controls. The operational controls already in place on site will continue to be implemented in respect of the additional waste types. It is understood that there have been no complaints in respect of dust or particulate matter emissions from the permitted activities since site operations commenced in July 2018.	

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Hazard	Receptor (ESID)	Pathway	Probability of exposure	Consequence	What is the overall risk?	Risk management	What is the residual risk?
What has the potential to cause harm?	What is at risk? What do I wish to protect?	How can the hazard reach the receptor?	How likely is this contact?	What is the harm that can be caused?	What is the risk? The balance of probability and consequence	What measures will you take to reduce the risk? If it occurs – who is responsible for what?	What is the risk that still remains?
Litter	Local human population / wildlife	Air transportation then deposition	Low	Nuisance, loss of amenity / harm to animal health	Low	The waste types which are accepted at the site, including the proposed new waste types, have a very low potential to generate litter. It is understood that there have been no complaints in respect of litter since site operations commenced in July 2018.	Very low
Contamination from wastes accepted	Groundwater	Infiltration	Medium	Contamination of groundwater	Low	The waste types which are currently authorised to be accepted at the site comprise inert and excavation wastes which have a low potential for leaching of substances which may contaminate groundwater.  It is proposed that LoW codes 19 12 12 and 19 13 02 are accepted at the site. Wastes accepted under LoW code 19 12 12 will comprise only inert and non-combustible wastes derived from the processing of construction and	Low

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Sources of the risk			Assessing the risk			Managing the risk	
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What has the potential to cause harm?	What is at risk? What do I wish to protect?	How can the hazard reach the receptor?	How likely is this contact?	What is the harm that can be caused?	What is the risk? The balance of probability and consequence	What measures will you take to reduce the risk? If it occurs – who is responsible for what?	What is the risk that still remains?
						demolition wastes via segregated waste processing lines at sites that employ active waste segregation practices. DB Cargo will implement thorough waste acceptance procedures and pre-acceptance procedures including regular analyses of waste to be accepted under LoW code 19 12 12. As the source of the 19 12 12 waste will comprise construction and demolition wastes and not commercial and industrial wastes or trommel fines derived from municipal solid waste, the waste accepted under LoW code 19 12 12 will be similar in nature to and will present no greater risk to controlled waters than the construction and demolition wastes currently authorised to be accepted at the site. Notwithstanding this, waste accepted under LoW code	

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Hazard	Receptor (ESID)	Pathway	Probability of exposure	Consequence	What is the overall risk?	Risk management	What is the residual risk?
What has the potential to cause harm?	What is at risk? What do I wish to protect?	How can the hazard reach the receptor?	How likely is this contact?	What is the harm that can be caused?	What is the risk? The balance of probability and consequence	What measures will you take to reduce the risk? If it occurs – who is responsible for what?	What is the risk that still remains?
						<p>19 12 12 will be stored on an impermeable surface with sealed drainage. The area of the site in which 19 12 12 waste will be stored is shown on Figure ERA 1 which shows also the extent of the impermeable surface at the site.</p> <p>Wastes accepted under LoW code 19 13 02 will comprise soils from remediation projects and will be similar in nature to the waste currently authorised to be accepted at the site under LoW code 17 05 04 soil and stones. DB Cargo will implement thorough waste acceptance procedures and pre-acceptance procedures including the review of site investigation documentation and soil remediation proposals and where relevant analyses of the waste to be accepted under LoW code 19</p>	

Table ERA 2 - Assessment of nuisance and amenity risks for the waste transfer station at Barking Eurohub

Sources of the risk			Assessing the risk			Managing the risk	
Hazard	Receptor (ESID)	Pathway	Probability of exposure	Consequence	What is the overall risk?	Risk management	What is the residual risk?
What has the potential to cause harm?	What is at risk? What do I wish to protect?	How can the hazard reach the receptor?	How likely is this contact?	What is the harm that can be caused?	What is the risk? The balance of probability and consequence	What measures will you take to reduce the risk? If it occurs – who is responsible for what?	What is the risk that still remains?
						<p>13 02 will be undertaken. Based on the nature of the waste and the control measures in place it is considered that the waste accepted under LoW code 19 13 02 will present no greater risk to the environment in respect of impact on controlled waters than the construction and demolition wastes currently authorised to be accepted at the site. Notwithstanding this, waste accepted under LoW code 19 13 02 will be stored on an impermeable surface with sealed drainage. The area of the site in which 19 13 02 waste will be stored is shown on Figure ERA 1 which shows also the extent of the impermeable surface at the site.</p> <p>Although the metal wastes to be added to the permit have a low potential for leaching of</p>	

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Hazard	Receptor (ESID)	Pathway	Probability of exposure	Consequence	What is the overall risk?	Risk management	What is the residual risk?
What has the potential to cause harm?	What is at risk? What do I wish to protect?	How can the hazard reach the receptor?	How likely is this contact?	What is the harm that can be caused?	What is the risk? The balance of probability and consequence	What measures will you take to reduce the risk? If it occurs – who is responsible for what?	What is the risk that still remains?
						substances which may contaminate groundwater these waste types will be stored on an impermeable surface with sealed drainage. The area of the site in which metal waste will be stored is shown on Figure ERA 1 which shows also the extent of the impermeable surface at the site.	
Contamination from wastes accepted	Surface water	Run off or infiltration	Medium	Contamination of surface water	Low	See above details in respect of groundwater.	Low
Mud and debris deposited on the public highway	Public highway / local human population	Vehicles entering and leaving site	Medium	Nuisance, loss of amenity / road traffic accidents	Medium	Figure ERA 1 identifies the areas of the site that comprise Tarmac surfacing and the areas that comprise hardstanding. The site access road, site reception and the currently permitted area, excluding Harry Sidings, comprise an impermeable surface which provides a readily cleanable surface for the vehicles transporting materials to and from	Low



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What has the potential to cause harm?	What is at risk? What do I wish to protect?	How can the hazard reach the receptor?	How likely is this contact?	What is the harm that can be caused?	What is the risk? The balance of probability and consequence	What measures will you take to reduce the risk? If it occurs – who is responsible for what?	What is the risk that still remains?
						the site. All site roads and surfaces are inspected on a working daily basis and are maintained in a condition consistent with minimising the risk of the accumulation of mud and debris on the highway. A mobile road sweeper is used as necessary. There are no proposals to store any of the new waste types in the Harry Sidings area of the site.	
Scavenging animals and birds	Local human population	Air and land	Low	Nuisance and loss of amenity / harm to human health – from waste carried off site and faeces	Low	The waste types that are accepted at the site are not considered attractive to scavenging animals or birds as the wastes do not comprise a source of food. The proposed changes will not increase significantly the risk associated with pests compared with the currently permitted operations. The WAP implemented at the site includes a visual and olfactory inspection of wastes received at	Very low

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Hazard	Receptor (ESID)	Pathway	Probability of exposure	Consequence	What is the overall risk?	Risk management	What is the residual risk?
What has the potential to cause harm?	What is at risk? What do I wish to protect?	How can the hazard reach the receptor?	How likely is this contact?	What is the harm that can be caused?	What is the risk? The balance of probability and consequence	What measures will you take to reduce the risk? If it occurs – who is responsible for what?	What is the risk that still remains?
						the site and wastes with the potential to attract scavenging animals or birds will not be accepted at the site.	
Pests (e.g. flies)	Local human population	Air and land	Low	Nuisance and loss of amenity / harm to human health	Low	As above.	Very low
<b>Accidents</b>							
Spillage of contaminants	Water resources	Direct run-off from site across ground surface / via surface water drains, ditches etc.	Low	Contamination of controlled waters	Low	Company operational, maintenance, inspection and accident management procedures are implemented at the site. Spillage kits are available on site and site personnel are trained in their use.	Very low
Accidental release of fuel from fuel store	Water resources	Infiltration through the impermeable surface or runoff through the	Low	Contamination of controlled waters	Low	All fuel at the site is stored and managed in accordance with The Control of Pollution (Oil Storage) (England) Regulations 2001. The application to vary the permit will not increase significantly the risk	Low

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Hazard	Receptor (ESID)	Pathway	Probability of exposure	Consequence	What is the overall risk?	Risk management	What is the residual risk?
What has the potential to cause harm?	What is at risk? What do I wish to protect?	How can the hazard reach the receptor?	How likely is this contact?	What is the harm that can be caused?	What is the risk? The balance of probability and consequence	What measures will you take to reduce the risk? If it occurs – who is responsible for what?	What is the risk that still remains?
		drainage system				associated with the accidental release of fuel compared with the currently permitted operations.	
Flooding of site	Local human population and local environment	Flood waters	Medium	If waste is washed off site it may contaminate buildings / gardens / natural habitats downstream	Low	Based on the Environment Agency digital flood map for planning, the site is located in Flood Zone 3 which is defined in the Technical Guidance to the National Planning Policy Framework as comprising land assessed as having a less than 1 in 100 annual probability of river flooding (<1%). The site is in an area benefitting from flood defences. As described above in respect of the emissions of contaminants to groundwater and surface waters, the waste types which are received at the site have a low potential for leaching of substances which may contaminate groundwater or surface water.	Very low

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Fire causing the release of polluting emissions to air and water	Local human population and local environment	Air transport of smoke / spillages and contaminated firewater by direct run-off from the site and via surface water drains and ditches	Low	Respiratory irritation, illness and nuisance to the local population / injury to staff, fire fighters or arsonists/vandals / pollution of water or land	Low	<p>The waste types currently permitted to be accepted at the site comprise inert and excavation wastes which are non-flammable and non-combustible hence the risk of waste fires occurring is negligible. LoW codes 19 12 12 and 19 13 02 which it is proposed are added to the permit are similar in nature to the currently permitted wastes and are non-flammable and non-combustible.</p> <p>The metal waste types to be added to the permit are all specified in Standard Rules Permit SR2009No7: storage of furnace ready scrap metal for recovery. There are no proposals for processing or treatment of metal wastes at the site. Standard Rules Permit SR2009No7 authorises up to 1,000,000 tonnes of waste to be</p>	Low

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						<p>accepted at a site per year hence well in excess of the quantity of metal waste that will be accepted under the bespoke permit for the site. SR2009No7 does not include a condition necessitating a Fire Prevention Plan (FPP) and the application process for SR2009No7 does not require a FPP to be prepared. The EA confirmed in pre-application advice that a FPP is not required. Details of the control measures employed at the site to minimise the risk of fires are presented in the site Environmental Management System and are summarised below.</p> <ul style="list-style-type: none"> <li><i>Controls on waste acceptance</i> The procedure for the inspection of incoming scrap metal includes checks to confirm that the load</li> </ul>	

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						matches the description on the WTN and a visual inspection for non-conforming items such as gas cylinders, gas bottles and WEEE and any non-conforming items are removed and managed in accordance with the non-conformation procedure. Any material found to be contrary to the environmental permit condition is either rejected from site and loaded back onto the vehicle and the Weighbridge Attendant is informed of the rejection or isolated in a designated quarantine area and removed from site to a suitably authorised facility as soon as practicable. Batteries are not accepted at the site and where these are observed in waste loads they are removed and placed in the quarantine area for removal from the site. Waste acceptance is	

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						undertaken by experienced site personnel trained to identify non-conforming items. A photographic record of non-conforming items is maintained to assist with ongoing waste acceptance and to inform waste producers about items which are not acceptable at the site. <ul style="list-style-type: none"> <li>• No hot works, welding or shearing of metal is undertaken at the site.</li> <li>• Smoking is not permitted at the site.</li> <li>• Security measures are employed at the site to prevent unauthorised entry to the site and hence minimise the potential for arson.</li> <li>• Plant and machinery is maintained and subject to routine inspection to minimise the potential for leaks and</li> </ul>	

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						<p>spillages of oils and fuels. Spill kits are available and staff are trained in their use.</p> <ul style="list-style-type: none"> <li>• Electrical equipment on site is fully certified by a suitably qualified person and regularly maintained.</li> <li>• Separation distances are employed between metal waste piles to facilitate access and to minimise the potential for a fire to spread at the site and stockpiles heights are minimised.</li> <li>• Metal wastes are stored away from fuel storage areas and buildings.</li> <li>• Fire watches are undertaken on an ongoing basis during the working day and a final site walkover fire watch is undertaken at the end of the day.</li> </ul>	



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						<ul style="list-style-type: none"> <li>• Mobile plant is parked overnight in a location away from waste piles.</li> <li>• A fire hydrant is located adjacent to the site for use by the Fire Service in the event of a fire.</li> <li>• Measures are in place to store chemicals and oils securely and with suitable infrastructure and operational procedures which will minimise the risk of these being a source of fire.</li> </ul> <p>Notwithstanding the information presented above, the Environment Agency requested in March 2023 that a Fire Prevention Plan (FPP) is prepared for the storage of metals at the site. FPP Version 1.0 dated April 2023 provides details of the control measures employed at the site in respect of fires.</p>	

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All on-site hazards; wastes; machinery and vehicles	Local human population and / or animals gaining unauthorised access to the waste operation	Direct physical contact	Medium	Bodily injury	Medium	Thorough Waste Acceptance Procedures are implemented at the site to minimise the risk that unsuitable and contaminated wastes are accepted at the site. Security measures are implemented at the site to minimise the potential for unauthorised access to the site.	Low
Waste operations may cause harm to and deterioration of nature conservation sites.	Protected sites - European sites and SSSIs	Air	Negligible	Harm to protected site through toxic contamination, nutrient enrichment, smothering, disturbance, predation etc.	Negligible	There are no Sites of Special Scientific Interest (SSSI), Special Areas of Conservation (SAC), Special Protection Areas (SPA), or Ramsar Sites located within 2km of the site.	Negligible
Waste operations may cause harm to and deterioration	Protected habitat – Priority habitat. Local Wildlife Sites (LWS),	Air	Low	Harm to protected site through toxic contamination, nutrient	Low	The proposed changes will not increase significantly the risk to protected habitats, LWSs and LNRs within 500m of the site compared with the currently	Low

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of nature conservation sites.	Local Nature Reserves (LNR)			enrichment, smothering, disturbance, predation etc.		permitted operations. Measures are in place to minimise the risk of unacceptable impacts from the waste operations on the surrounding environment which will be protective also of the nature conservation sites (see above).	
Waste operations may cause harm to and deterioration of heritage conservation sites.	Designated heritage sites – Scheduled Monuments and Listed Buildings	Direct physical contact	Negligible	Movement of vehicles and the deposition of debris	Negligible	There are no designated heritage sites within 500m of the site.	Negligible