AC ENVIRONMENTAL CONSULTING

Environmental Management System

Leicester City Council- City Highways

Castle Park Depot, 90 Leycroft Rd, Leicester LE4 1BZ

July 2024

Ref: LCC.PT.FPP.2405

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Reference & Revision	Issue	Prepared	Approved
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CONTENTS

This Environmental Management System is for Leicester City Council- City Highways at Castle Park Depot, 90 Leycroft Rd, Leicester LE4 1BZ.

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

1. LOCATION

The site is in a mixed commercial/industrial and residential area. The permitted area sits in the Leicester City Council- City Highways yard. The permitted area itself consists of bays in the external yard, and three 20cyd skips- all for the storage of waste. The amount of waste received daily varies with season and City Highways workload, however annually the total quantity of waste shall be no more than 25,000 tonnes.

Reference to the DEFRA Air Quality Management Area (AQMA) interactive map indicates that the site is not within a AQMA boundary for any pollutants (NOx, PM10 and SO2).

The site is located within a Flood Zone 1, indicating that the land is assessed as having a 1 in 1000 or greater annual probability of river flooding (<0.1%). The nearest sensitive residential property lies approximately 137m north-northwest on Laithwaite Close.

2. HISTORY

Through historical mapping, the site can be seen to be open field on the earliest map of 1861. This continues for the rest of the historical maps available up to the date of 1923, where it shows to be a sewage farm. Following this, Google Earth was used to see more recent mapping. From this, it can be seen that in 1999 and 2000, the site was an un-used field, however neighbouring areas to the site consisted of industrial/commercial businesses and factories. From 2002 to present day, the site has had its existing building erected with no alterations to the site details, and has similar storage uses.

3. OPERATING HOURS

The site is not open to public. The normal operating times are outlined below:

Monday – Friday: 06:00 – 18:00

Saturday – Sunday: As required

The site is open 24/7 for emergence highway maintenance responses undertaken by City Highways.

4. SITE DESIGN

Leicester City Council- City Highways is a highways facility at Castle Park Depot, 90 Leycroft Rd, Leicester LE4 1BZ. Due to the operations that occur at the site, Leicester City Council- City Highways is seeking to vary their existing permit to a bespoke permit in order to continue their operations and be compliant with the recent Environment Agency legislations. The variation includes the following:

- the handling of highways waste contaminated with coal tar
- increase the quantity of waste stored on the site at any one time
- vary the layout of the site
- extend the permit boundary

The site handles waste that are associated with the operations carried out as part of City Highways maintenance and development works.

The site is designed to allow for the sorting and storage of different waste types. The permitted area consists of bays, and skips, for the storage of these wastes. The entirety of the site (including the permitted area) also benefits from a concreted surface. The site layout can be seen clearly on drawing ref: 240313LCC104.

The permitted area consists of only an external yard for all operations and storage. Regarding storage, there are two 20cyd skips in total which are used for the storage of general waste, and scrap metal. It is key to note that there is a section on the site which is used as alternative storage for either of the 20cyd skip stockpiles. The rest of the storage on site are contained within precast concrete L shape retaining walls which store all highways waste, inert non-waste, green waste, and lab bays. Beyond the permitted area are offices which act as a storage facility for FloodSax and PPE.

The permitted area site within a larger site which is controlled and managed by Leicester City Council. This site is fully secure with perimeter fencing and access gates.

The site has secure fencing and gates that are kept locked shut out of hours. The site has an alarm and CCTV cameras. The CCTV is operational 24/7, with there being an out of hours security guard who will contact management should they pick up anything during the CCTV monitoring. In the event of a fire, FloodSax and clay drain mats will be deployed across to contain fire water as shown on Drawing Ref: 240313LCC104.

a. Vulnerable Locations

The site has various sensitive receptors that may be vulnerable to pollution within 1km of the site e.g. residential, commercial and industrial premises. The nearest sensitive residential property lies

approximately 142m north-northwest on Laithwaite Close. The nearest commercial and industrial properties are neighbouring the site, with there being a multitude of other commercial and industrial properties within 1km of the site. Within the 1km radius from the site, there are educational and medical properties, as well as there being a care home within the area. In terms of educational facilities, the closest is Beaumont Lodge Primary School located 338m north-northeast of the site, with First Steps Beaumont Leys being 618m southwest of the site. Heatherbrook Primary Academy is located 806m west-northwest from the site and 1000m south of the site is Babington Academy.

Three medical facilities are within the 1km radius of the site. Beaumont Lodge Surgery is located 465m to the north, with Heathbrook Surgery being situated 461m to the north of the site also. Bupa Health Centre Leicester is 604m southeast from the site. There is only the one care home within 1km of the site, George Hythe House Residential Care Home, and it is situated approximately 792m away to the northeast.

The site is fully surfaced with impermeable concrete, has water containment measures and pollution control measures in place to prevent pollution e.g. spill kits and sandbags. The concrete surface that stretches across the entire site and can be easily swept and kept clean in accordance with a cleaning schedule, which will reduce the risk of the spread of dust, mud, and debris to surrounding receptors and the public highway.

As mentioned above, the concrete surface throughout the site can easily be kept clean through sweeping, which reduces the risk of the spread of dust, mud, and debris to surrounding receptors and the public highway. Attention shall be paid to accumulations near sources of ignition such as dust/fluff build up on or around electrical equipment, panels etc.

b. Drainage

The site is surfaced with impermeable concrete. Brick perimeter walls are also present to the northeast and southeast of the permit boundary with a height of 2.5m which will work alongside the FloodSax deployment to contain contaminated water and fire water.

The site has surface drainage with there being a gully surrounding the waste storage area in which are six surface grids leading to the site interceptor. The location is highlighted within the site layout Ref: 240313LCC104.

In the event of a fire, Flood Sax and clay mats will be used to contain any fire water. Due to the wastes being contained within the precast concrete L shape retaining walls bays and 20cyd skips, the only containment needed is against the bays to the perimeter brick wall to prevent any fire water exiting the permitted area. It is important to note that the FloodSax are only needed to contain the area in

which there are flammable wastes as stockpiles 8-11 store inert non-waste or are used as a lab bay for non-flammable highways waste. Clay drain mats will by places over the surface grids within the area firewater will be held. This, furthermore, will enable the FRS to gain easy access to the site, as the permitted area does not include the site entrance gates, therefore no fire containment is required at the site entrance.

In the event of a spillage, site management will be notified immediately, and trained staff will deal with the spill in situ using the spill kit located on site at all times. The spill kit is stored internally, within a covered storage building in the larger site area, as shown on Drawing Ref: 240313LCC104.

c. Water, Gas and Electricity

Gas and electric to the depot are provided by Total Energies. The water supply to the site is provided by Castle Water. There are no gas installations within the waste storage area.

d. Waste Handling

The permitted area is used for the storage of wastes associated with highway maintenance operations. Waste types stored on the site includes highways waste (consisting of soil, hardcore, tarmac, mixed construction waste, and concrete), scrap metal waste, general waste, and green waste. The site accepts hazardous waste in the form of highways waste that contains bitumen at a level that causes it to display a hazardous property. Each waste stream has an allocated stockpile on site as shown on Drawing Ref: 240313LCC104. As the site is obtaining numerous EWC codes, they are detailed in Section 5. The operations will be subject to the Environmental Permitting Regulations and RPS 298 and RPS 299.

The site handles primarily highways waste alongside other wastes (outlined above) which has been delivered to site by council deliveries only.

Initially, an observation and document check for collecting waste occurs at the place of production. This includes visual check and smell the arisings - strong odours, uncommon colours, or sheen could indicate that the waste is potentially contaminated. At site, there is also a check of bituminous mixtures (Tarmac) with PAK spray to see if the waste contains coal tar. Should the spray turn yellow, this indicates that coal tar is present, and management are to be informed immediately to ensure a bay has capacity to take the load. The description on the waste transfer note is to match the waste collected at the site of production.

Once the waste arrives at site, the delivery vehicles halt at the Waste Reception Area. The Authorised Person or Approved Deputy will visually inspect the load and reject loads that contain non-conforming wastes. The designated individual will also reiterate the steps that were taken at the point of waste

collection: smelling the load and using a PAK spray to ensure that the waste goes into a hazardous, or non-hazardous area. Should the load be odorous, the load will be rejected. It will also be checked that the description on the waste transfer note or consignment note to match the description of the waste.

The stockpiles within the permitted area include highways waste (consisting of soil, hardcore, tarmac, mixed construction waste, and concrete), scrap metal waste, general waste, and green waste. All waste tipping, sorting, processing, and storage occurs on the impermeable concrete surface. All waste will have a normal retention time of no more than 2 weeks to allow for flexibility, however the retention times are dictated by the requirements of highways works. Some of the wastes are tested and held in the lab-bays to see if it is hazardous; in this case there is a maximum retention time of 4 weeks as it may take 2-3 weeks for the lab results to determine whether the waste is hazardous or not. A first in first out (FIFO) procedure is in place to ensure that stock rotation is in practise in order to remain in accordance with the retention time of 2 weeks. This will ensure that stockpiles do not breach the size limits within the Environment Agency guidelines.

Lithium Batteries

Lithium batteries are not permitted on the site. Due to the site operating protocol including pre-booking the waste type (in order to send out the correct containers), there is no possibility for the accidental acceptance of lithium-ion batteries within a load.

Hazardous Waste

The site accepts hazardous waste in the form of highways waste contaminated with coal tar- which will be retained on site for no longer than 4 weeks before being taken away by a suitable company permitted to deal with the wastes. The areas in which these wastes are stored are outlined in the site layout plan Ref: 240313LCC104.

5. SITE OPERATIONS

The range of wastes handled and accepted on site are described above in Section 4. All the waste accepted at the site will be in accordance with the Environmental Permit for the site.

a. Waste Types

The range of wastes handled on site are described above in section 4d. All the waste accepted at the site will be in accordance with the Environmental Permit for the site.

Due to the site currently operating under a permit, the current EWC codes the site handle are listed alongside the additional EWC codes- with the additional EWC codes outlined in bold.

Waste Code	Description of Waste
17 01 06*	**Mixtures of, or separate fractions of concrete, bricks, tiles and ceramics containing hazardous substances**
17 01 07	Mixtures of concrete, bricks, tiles and ceramics other than those mentioned in 17 01 06
17 02 01	Wood
17 03 01*	**Bituminous mixtures containing coal tar**
17 03 02	Bituminous mixtures other than those mentioned in 17 03 01
17 04 07	**Mixed metals**
17 04 11	cables other than those mentioned in 17 04 10
17 05 03*	**Soil and stones containing hazardous substances**
17 05 04	soil and stones other than those mentioned in 17 05 03
17 05 08	track ballast other than those mentioned in 17 05 07
17 09 04	**Mixed construction and demolition wastes other than those mentioned in 17 09 01, 17 09 02 and 17 09 03**
20 01 39	plastics
20 01 40	Metals
20 02 01	**Biodegradable waste**

b. Waste Storage and Handling

All waste within the permitted area is stored externally in 20cyd skips, or within designated bays. All waste will be stored on site normally no longer than 2 weeks to allow for flexibility. A first in first out (FIFO) procedure is in place through ensuring all stockpiles are removed from site once full. This will reduce the risk of the production of odour and dust. This will also ensure that stockpiles do not breach the size limits within the Environment Agency guidelines and the Environmental Permit.

The table below illustrates the stockpiles on site and the maximum volume for each:

Stockpile Number	Material Type/Stockpiles	Form	Location	Maximum Amount in each area (m^3)
1	Green Waste	Solid	External Bay	36
2	Highways Waste	Solid	External Bay	110

3	Highways Waste	Solid	External Bay	120
4	General Waste	Solid	20cyd Skip- External Bay	15.29
5	Highways Waste	Solid	External Bay	47
6	Highways Waste	Solid	External Bay	40
7	Lab Bay	Solid	External Bay	30
8	Inert Non Waste or Lab Bay	Solid	External Bay	50.8
9	Inert Non Waste or Lab Bay	Solid	External Bay	47.7
10	Inert Non Waste or Lab Bay	Solid	External Bay	53
11	Inert Non Waste or Lab Bay	Solid	External Bay	61.48
12	Scrap Metal	Solid	20cyd Skip	15.29
13	Alternative Storage for Stockpile 4 or 12	Solid	20cyd Skip	15.29

c. Retention Times

The variety of waste streams accepted on site and the manner in which Leicester City Council- City Highways operate means that the site can be considered to be low risk. Each waste stream has an allocated stockpile area as shown on Drawing Ref: 240313LCC104 and have a maximum retention time of 2 or 4 weeks (depending on the waste type) in order to allow for flexibility.

Material Risk Rating	Timescale
Low risk material (highways waste, scrap metal, green waste, general waste)	Material will be processed within 2 weeks
Higher risk material (coal tar highways waste)	Material will be processed within 4 weeks

d. Pre-acceptance Procedure

Prior to waste being brought onto site, highways staff who deliver waste to the site and work on any of the highway operation sites will be advised that the site will not accept any loads that contain EWC codes not specified on the list in section 5a.

It is crucial to note that the site will only accept waste with the same EWC codes outlined in section 5a. Advising customers will significantly reduce the risk of non-conforming waste from entering the site.

Furthermore, PAK testing and lab testing occurs. PAK testing occurs at smaller scale operations, whilst lab testing occurs where there may be a larger quantity of waste coming to the site. The lab testing requires a 'lab testing' bay to be free to hold and quarantine the waste until the composition is known.

e. Waste Acceptance Procedures

Waste acceptance procedures begin at the highways work locations. Members of highways staff undertake an initial observation and document checks for collecting highway waste at the place of production. This includes the following steps:

- Visually check and smell the arisings - strong odours, dark colours, or sheen could indicate that the waste is potentially contaminated
- Check bituminous mixtures (Tarmac) with PAK spray at smaller highways works locations to determine whether the load contains coal-tar
- Inform management immediately should the PAK spray turn yellow in order to ensure that storage is available for the waste
- Take samples prior to works on larger highways works to determine if coal-tar is present
- Do not load the wastes if you suspect that asbestos or other non-conforming waste may be present
- The description on the waste transfer note is to match the waste collected at the site of production

In order to receive the waste on site, the following steps are taken:

- Do not mix the incoming loads with other wastes until you are certain of its composition and that it can be accepted on site

Once the loads arrive at site:

- All vehicles to halt at the Waste Reception Area
- Ensure appropriate PPE is available and use if required
- The Authorised Person or Approved Deputy will visually inspect the load and reject loads that contain non-conforming wastes
- The Authorised Person or Approved Deputy will smell the load - reject odorous loads

- The Authorised Person or Approved Deputy will use PAK spray on loads containing bituminous mixtures (Tarmac) to ensure that wastes that contain coal-tar (and are therefore hazardous) are kept separate from non-hazardous loads. This is a secondary step to the original testing to ensure certainty of the composition of the waste
- The description on the waste transfer note or consignment note to match the description of the waste
- Loads will be deposited into the assigned storage area in accordance with the site plan (Ref: 240313LCC101)

When the waste is accepted to the site and have undergone the correct form of procedure, the wastes are directed accordingly in adherence to the site storage and handling procedures, outlined in section 5b.

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

f. Non-conforming Waste

Every load brought onto site will be inspected by site management. There is no possibility of non-conforming waste entering the site due to the stringent waste acceptance procedures outlined in section 5e.

Non-conforming waste is identified at the highways works, site management will be alerted immediately. This ensures that suitable steps are taken to ensure that the non-conforming waste is not loaded and brought to the site.

g. Hazardous Waste Handling Procedures

The site handles hazardous waste. Hazardous waste is collected from various sources in the surrounding areas delivered to site by the company's own transport. It is key to note that the site undertakes tests to determine whether the highways waste is hazardous or non-hazardous. This is completing using PAK testing on smaller sites, and through taking a sample from larger sites prior to commencement. Should works commence prior to the lab results determining the waste type, the highways waste is brought to the site and held in a lab bay whilst the results are being processed. Once the lab results are back, the site will then know if the load is hazardous, and if so, will ensure that the highways waste from the rest of the site is kept separate from non-hazardous highways waste.

On arrival, hazardous waste is inspected in Waste Reception Area to ensure that the waste delivered to the site meets the following criteria:

- EWC Code on the waste transfer note conforms to the waste inside the container.
- Permit waste acceptance criteria – waste meets with the criteria of the environmental permit and the planning permissions for example, waste accepted would be within the permissible tonnage and waste type acceptance criteria.

If non-conforming hazardous waste is identified upon arrival, the load will be rejected immediately.

h. Weighing Facilities

The larger area of the site does not have a weighbridge. However, weigh pads for random vehicle checks are undertaken, and vehicles used for waste transfer are fitted with on board weighting system. Waste vehicles will be weighed upon arrival and prior to exiting the site for each movement of waste to and from the site. Weight records will be kept within the office.

i. Operating Arrangements

Mobile plant in the form of a loading shovel is used for daily site activities for manoeuvring wastes within the site. 4 mobile cranes/grab trucks are also used to deliver and unload wastes at the site, as well as removing wastes to other suitably permitted facilities. Breakdown events will be dealt with in accordance with the section below.

Products and wastes leaving the site are transported using the companies own transport or approved and compliant subcontractors.

j. Inspections and Maintenance

Routine site inspections are carried out daily by the site manager or the delegated offcer. Where any damage is found to infrastructure or plant and vehicles these shall be reported and repaired within the set timescales:

Plant & Vehicles – 24 hours

Fencing – 24 hours

Drainage – 7 days

Buildings – 7 days

If this is not possible, alternative arrangements shall be made as detailed below:

A site inspection will be carried out daily by the COTC holder. The results are recorded on the Daily Site Diary and Fire Check Sheet.

As a minimum, the site inspection shall consider:

- Condition of concreted areas
- Site access
- Perimeter walls
- Fencing
- Waste records
- Site tidiness/stockpiles
- Litter, pests, mud, dust and odour

Any issues found will be dealt with promptly and within the timescales highlighted above.

A review of daily checks shall take place at management meetings. Any trends identified will be discussed and action taken to address the issues.

k. Site Tidiness

The site will be inspected daily by the site manager and by the COTC Holder. Any accumulated litter, debris or dust will be removed. The site access and concrete standing will be swept if accumulations of dust, debris or litter become visible by a mechanical sweeper.

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

l. Site Security

The site has not experienced any trespass or vandalism in the last few years. The site in which the permitted area is situated has several CCTV cameras, which will be maintained in accordance with the manufacturer's guidance. Furthermore, there is an out of hours security guard (Monday to Friday 6pm to 6:30am and all weekend) who will also contact management should they find any intrusions.

m. Dust Control

Due to the nature of the wastes on the site, dust is considered to be a negligible issue. The small quantity of waste on site, and the use of bays mitigates to mitigate wind-whipping justifies the negligible issue. Regardless, the site is entirely concreted, and all vehicles are only operated on the concrete surface. Any accumulations of dust on site will be removed by hand sweeping or by a mechanical sweeper. Site staff inspect the site daily for accumulations of dust in accordance with a cleaning regime which is provided in Appendix 3.

The site operates in accordance key mitigation measures to reduce the risk of the spread of potential dust to neighbouring properties such as:

- Enforcing a strict speed limit of 5mph across the site.

- Minimising drop heights when unloading waste.
- Maintaining good housekeeping across the site.

If any complaints were to arise, the site will make every effort to reduce the risk of dust and respond to the complaint immediately as per the Complaint Procedure. Any dust issues will be dealt with in accordance with site procedures.

n. Noise Management

The site is in a mixed industrial and residential area. The site operations are not considered to be noisy nor have the potential to cause an issue beyond the site boundary. However, many measures are taken to prevent noise generated by permitted operations.

Measures taken to minimise noise are:

- Only operate during working hours.
- Minimising drop heights when unloading waste.
- Switch engines off whilst unloading or waiting to unload.
- When not in use plant vehicles will be switched off.
- All plant are fitted with white noise reversing beepers.
- Noise complaints to be recorded and investigated.

o. Litter Control

There is a risk of litter due to the type of wastes accepted on site. However, the design of the site allows waste operation and storage to be enclosed in skips or bays. This alongside the gated entrance and surrounding fencing of the larger site will minimise the any litter escaping the site.

Measures which can be taken to minimise litter is:

- Litter pick can be carried out by a member of staff on site.

6. CONTINGENCY PLANS

In the event of a breakdown, the site would cease operations. The site management would be alerted, and temporary equipment/machinery would be hired in whilst repairs are made. In the event that temporary equipment/machinery could not be hired, any organised deliveries of waste will be cancelled and any loads already in transit to the site will be diverted to another suitable permitted facility. The site will not become operational or receive deliveries until it can continue to operate within the conditions of the permit.

In a fire event all operations on site would cease. The site gates would be closed and manned to ensure that no vehicles other than the FRS or Environment Agency could gain access to the site. For the duration of the fire and the clean-up, no wastes will be accepted on site. FloodSax and clay drain mats will be deployed to contain firewater within the designated permitted area as shown on drawing 240313LCC104.

In the event of a flood all operations will cease. No vehicles other than the FRS or Environment Agency will gain access to the site due to control of the site entrance by staff.

Ceasing operations in the event of a breakdown, fire or flood will mean that all site operations will stop, including waste acceptance.

7. A CHANGING CLIMATE

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

- extreme rainfall, leading to more frequent and severe floods
- heat waves
- drought
- rising sea levels and tidal waves
- storms and flames.

As a result of changing climate, a climate change risk assessment (Ref: LCC.PT.CCRA.2407) has been produced in order to illustrate the potential impacts and mitigation measures for the site. This is illustrated in Appendix 4.

8. PERSONNEL AND DUTIES

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

Site management is also the technically competent manager and will undertake weekly site inspections. A copy of the WAMITAB certificate of the COTC holder is kept on site.

9. STAFF COMPETENCE AND TRAINING

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

Operatives are responsible for carrying out all daily operations.

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

10. RECORDS

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

11. SITE CONDITION REPORT

1.0 SITE DETAILS	
Name of the applicant	**Leicester City Council- City Highways**
Activity address	**Castle Park Depot,** **90 Leycroft Rd,** **Leicester** **LE4 1BZ**
National grid reference	**SK 56814 08534**

Document reference and dates for Site Condition Report at permit application and surrender	**11. Site Condition Report**

Document references for site plans (including location and boundaries)	**240313LCC104 (Site Layout)** **240313LCC102 (Site Location)**

2.0 Condition of the land at permit issue

Environmental setting including: • geology • hydrogeology • surface waters	**The site is underlain by made ground according to the British Geological Survey Mapping.** **A review of the British Geological Survey (BGS) map reveals that the site is underlain by Edwalton Member - Mudstone. This is sedimentary bedrock formed between 237 and 228.4 million years ago during the Triassic period.** **The site is also located within TRIASSIC ROCKS (UNDIFFERENTIATED) rock unit which is a low productivity aquifer. Largely argillaceous sequence with occasional sandstones yielding less than 0.5 L/s of water that can be highly mineralised. Confines the underlying Sherwood Sandstone aquifer.** **The nearest publicly available borehole is located 67m northeast of the site and indicates that the ground consists of topsoil to a depth of 0.17m. Following this, the borehole is filled still/very stiff becoming very stiff brown and grey mottled chalky boulder clay, with races of roots to 1.5m (with occasional selenite crystals below 3m), to a depth of 5m. Hard dark grey chalky boulder clay is then present to 8.3m before the remainder of the borehole showing hard dark grey/brown chalky boulder clay to the final depth of 11m** **A second borehole is located 61m to the southeast of the site and shows composition of topsoil to a depth of 0.28m. Stiff/very stiff becoming very stiff, brown and grey mottled chalky boulder clay, with occasional selenite crystals at 5m, is**

	present for the remainder of the borehole which ends at 5m. **A third borehole 67m to the northeast shows there to be topsoil to a depth of 0.23m. Very stiff brown and grey mottled chalky boulder clay with occasional selenite crystals is present to a depth of 2m before very stiff/hard dark grey/brown chalky boulder clay, with occasional selenite crystals to 4m, and cobbles and boulders becomes apparent to a depth of 6m. The remainder of the borehole is hard dark grey chalky boulder clay to 7.5m- where the borehole ends.** **164m to the west, a fourth borehole indicates there to be topsoil to a depth of 0.17m and then stiff/very stiff becoming very stiff grey and brown mottled chalky boulder clay with selenite crystals below 4.5m to a depth of 5m. Hard dark grey chalky boulder clay with occasional selenite crystals becomes present until the final depth of 9m.**
Pollution history including: • pollution incidents that may have affected land • historical land-uses and associated contaminants • any visual/olfactory evidence of existing contamination • evidence of damage to pollution prevention measures	**There are no Environment Agency recorded pollution incidents associated with the site that may have affected the land.** **Through historical mapping, the site can be seen to be open field on the earliest map of 1861. This continues for the rest of the historical maps available up to the date of 1923, where it shows to be a sewage farm. Following this, Google Earth was used to see more recent mapping. From this, it can be seen that in 1999 and 2000, the site was an un-used field, however neighbouring areas to the site consisted of**

	industrial/commercial businesses and factories. From 2002 to present day, the site has had its existing building erected with no alterations to the site details, and has similar storage uses. **The current use of the site is considered unlikely to have caused any contamination. All wastes will be deposited onto a concrete surface.** **Containment systems are in place should a fire occur, including FloodSax and clay mats to contain the firewater. Therefore, during any fire event there will be no pollution of soils, surface water or groundwater.**
Evidence of historic contamination, for example, historical site investigation, assessment, remediation and verification reports (where available)	**No previous historical site investigation data or reports are available.**

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

3.0 Permitted activities	
Permitted activities	**Bespoke application**
Non-permitted activities undertaken	**N/A**
Document references for: • plan showing activity layout; and • environmental risk assessment.	**240313LCC102** **240313LCC104** **LCC.PT.ERA.2407**

4.0 Changes to the activity	
Have there been any changes to the activity boundary?	**Yes- extension to include an area for the quarantine area**
Have there been any changes to the permitted activities?	**Yes**
Have any 'dangerous substances' not identified in the Application Site Condition Report been used or produced as a result of the permitted activities?	**No**
Checklist of supporting information	**N/A**

5.0 Measures taken to protect land	
Pollution prevention measures have been carried out and are in place at the site. The entire site yard is surfaced with impermeable concrete surface throughout, and FloodSax and clay mats will be deployed in the event of a fire to contain contaminated fire water that no substances will enter exit to the surrounding area.	
Checklist of supporting information	• **Inspection records and summary of findings of inspections for all pollution prevention measures** • **Records of maintenance, repair and replacement of pollution prevention measures**

6.0 Pollution incidents that may have had an impact on land, and their remediation

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

Checklist of supporting information	• **Not Applicable**

7.0 Soil gas and water quality monitoring (where undertaken)

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

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

Checklist of supporting information	• **Not Applicable**

8.0 Decommissioning and removal of pollution risk

Checklist of supporting information	• **None**

9.0 Reference data and remediation (where relevant)

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

Checklist of supporting information	• **None**

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

12. FIRE CONTROL AND PREVENTION

Mains water is available on site. A fire hydrant is available approximately 80m to the northeast of the larger site entrance.

Fire extinguishers have been supplied to the company and are available in the throughout the enclosed building warehouses.

Fire prevention will be practiced in accordance with the site Fire Prevention Plan, and through good housekeeping.

13. COMPLAINTS

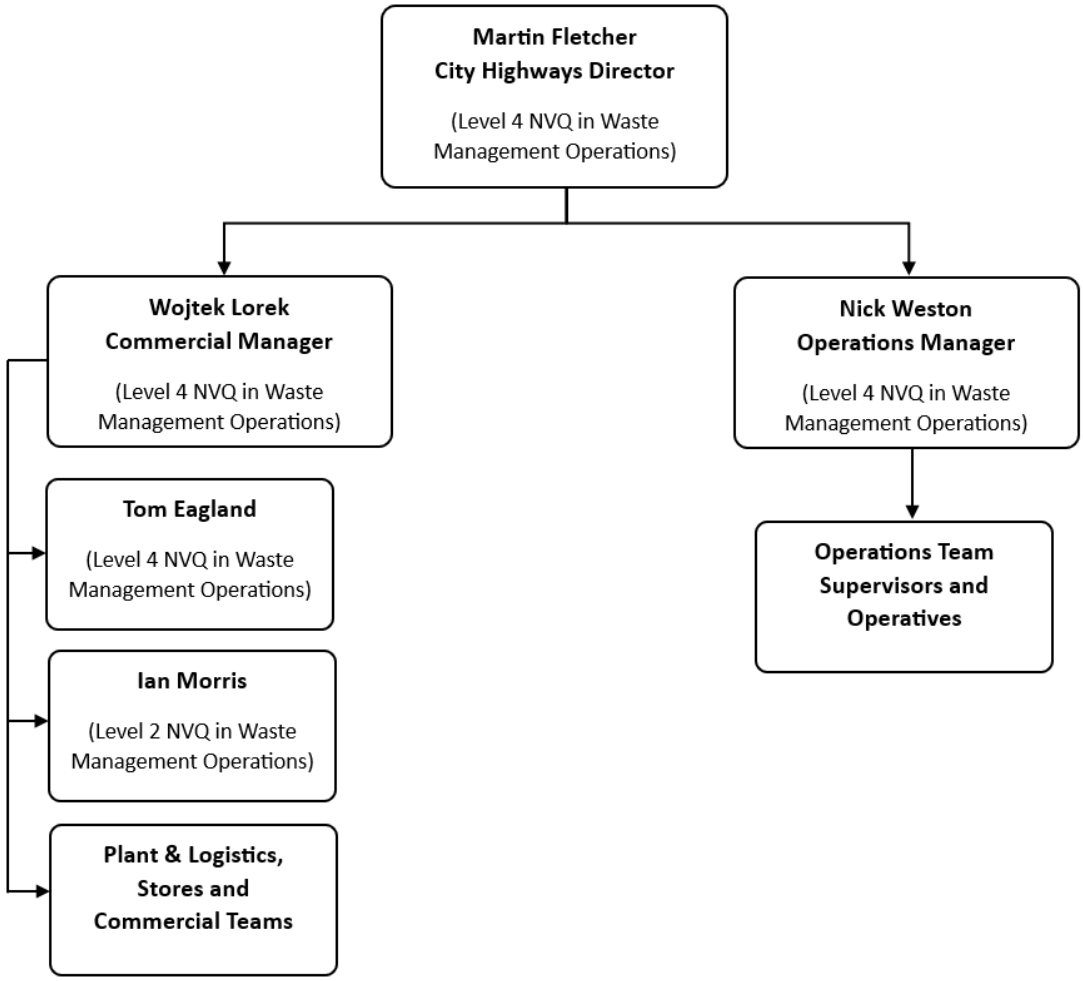
Any complaints received shall be dealt with in accordance with the complaints procedure of the Site Working Procedures Manual.

14. REVIEW OF THE SYSTEM

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

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

APPENDIX 1 – MANAGEMENT STRUCTURE



APPENDIX 2 – DRAWING REF: 240115RL104

LEYCROFT ROAD

Brick Wall 2.5m High

Brick Wall 2.5m High

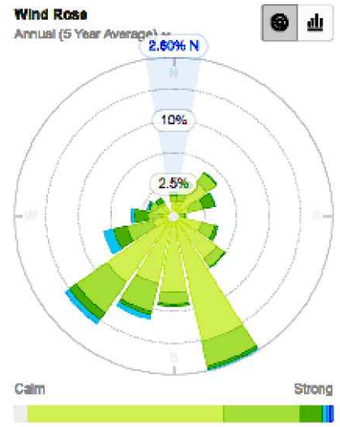
Palisade Fence 2.4m High

Palisade fence = 0.95m high on brick wall = 2-2.2m high

Boiler Room
STAIRS
Chemicals
STAIRS
STAIRS
TM & Plant
Misc
LPG Cylinders Cage
Gully
13
Water Filled Barrier
1
Barriers and Signs Store Area
2
Waste Storage Area
3
TM Store Area
4
Open Channel (Foul Sewer)
5
6
7
12
Gully
Hiyways Store Storage Area
Precast Concrete Material Storage
8
9
10
11
Gully
SITE ENTRANCE
Splitter
Jetter Garage & Emergency Stores
Tack Coat Storage

1. Green Waste - 6 x 3 x 2 = 36m^3
2. Highways Waste - 5.5 x 10 x 2 = 110m^3
3. Highways Waste - 6 x 10 x 2 = 120m^3
4. General Waste - 20cyd Skip = 15.29m^3
5. Highways Waste - 4.7 x 5 x 2 = 47m^3
6. Highways Waste - 4 x 5 x 2 = 40m^3
7. Lab Bay - 3 x 5 x 2 = 30m^3
8. Inert Non Waste or Lab Bay - 4.8 x 5.3 x 2 = 50.88m^3
9. Inert Non Waste or Lab Bay - 4.5 x 5.3 x 2 = 47.7m^3
10. Inert Non Waste or Lab Bay - 5 x 5.3 x 2 = 53m^3
11. Inert Non Waste or Lab Bay - 5.8 x 5.3 x 2 = 61.48m^3
12. Scrap Metal - 20cyd Skip = 15.29m^3
13. Alternative storage for stockpile 4 or 12= 15.29m3

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



- Permit Boundary
- CCTV Camera
- Surface Grid
- Spill Kit
- PPE Storage
- Fire Wall
- Fire extinguisher
- Surface Water Drainage
- Foul Water Drainage

CLIENT
LEICESTER CITY COUNCIL

SITE
90 Leycroft Road,
Leicester
LE4 1BZ.

PROJECT
PERMIT APPLICATION

TITLE
ENVIRONMENTAL MANAGEMENT SYSTEM

SCALE @A3	DATE	DRAWN BY	CHECKED BY
1:500	Aug 2024	T Kearns	D Alcock

DRAWING NO
240313LCC104

REVISION

REV	DATE	DETAIL

APPENDIX 3 – CLEANING SCHEDULE

Area	Leicester City Council- City Highways Cleaning Schedule						
	Mon	Tues	Wed	Thurs	Fri	Sat	Sun
Site Surfaces							
Access Roads							
Mobile Plant							

APPENDIX 4- CLIMATE CHANGE RISK ASSESSMENT

Climate Change Risk Assessment

Facility: Leicester City Council, City Highways

Location: Leycroft Road, Leicester, LE4 1BZ

Risk assessment carried out by: Mary Simcock

Date: 17-Oct-24

Data and information				Judgement				Action (by permitting)	
Receptor	**Source**	**Harm**	**Pathway**	**Probability of exposure**	**Consequence**	**Magnitude of risk**	**Justification for magnitude**	**Risk management**	**Residual risk**
What is at risk? What do I wish to protect?	**What is the agent or process with potential to cause harm?**	**What are the harmful consequences if things go wrong?**	**How might the receptor come into contact with the source?**	**How likely is this probability of exposure?**	**How severe will the consequences be if this occurs?**	**What is the overall magnitude of the risk?**	**On what did I base my judgement?**	**How can I best manage the risk to reduce the magnitude?**	**What is the magnitude of the risk after management? (This residual risk will be controlled by Compliance Assessment).**
Local human population	Greater potential for increased waste reactions and fires.	Harm to human health - respiratory irritation and illness.	Air transport then inhalation.	Very Low	Medium	**Low**	The only flammable wastes on site are stored in very small stockpiles, therefore mitigating against the risk of waste reactions. These wastes are at least 6m away from the other flammalbe wastes	Ensure that all wastes are stored in their designated stockpiles and undergo thermal monitoring as per the Fire Prevention Plan instructions	n/a
Local human population	Potential increased risk of wildfires impacting the site	Harm to human health - respiratory irritation and illness.	Air transport then inhalation.	n/a	n/a	**n/a**	The permitted area is situated within Leicester City, therefore the surrounding areas are commercial/industrial use and has no risk from wildfires from occuring	n/a	n/a
Local human population	Potential for fire if the temperature exceeds the heat rating of components in electrical equipment or components are subjected to intense and direct sunlight	Harm to human health - respiratory irritation and illness.	Air transport then inhalation.	n/a	n/a	**n/a**	All wastes are stored externally with there being no components or electrical equipment within the permitted area	n/a	n/a
Staff, visitors, local human population	Increase in high temperature expansion and stress of plant, pipework and fittings	Danger to those on site through injury	Physical.	Very Low	Low	**Very Low**	The site operates in accordance with an inspection and maintenance procedure which involves routine inspections. These inspections are carried out daily by the site manager and weekly by the COTC holder. Where any damage is found, these shall be reported and repaired within set timescales	Ensure that management complies with the regular inspection and preventative maintenance of site, plant and equipment. Should any degradation be noted, the impacted part will be replaced with types of material less susceptible to photo-degradation (should it be available)	Very low

Local human population, livestock and wildlife.	Potential increased dust emissions with reduced availability of water for dust suppression	Nuisance, loss of amenity and harm to animal health	Air transport then deposition	High	Low	**Low**	There are measures to be implemented to reduce the risk of dust including how all wastes are stored within bays or skips. It is crucial to note that all stockpiles will be kept 1m below the height of bay walls to reduce the risk of the spread of dust through wind whipping.	All vehicles are only operated on the concrete surface. Any accumulations of dust on site will be removed by hand sweeping or by a mechanical sweeper. Site staff inspect the site daily for accumulations of dust in accordance with a cleaning regime	Low
Local human population	Odour intensifying due to increased temperatures both in summer and winter	Nuisance, loss of amenity	Air transport then inhalation.	Low	Low	**Low**	The only waste on site that may give rise to odour is the green waste. This waste is a small stockpile making is easily managable should any odour be noticeable, the waste will be removed from the site. Furthermore, waste brought to the site undergo an odour check, and shoud there be any smells, the load is rejected	Any noticeable odours will be reported to management, who will ensure that the offending waste is removed as soon as possible. Should odour be a prevailing issue, the site will review measures in place	Low
Local human population	Scavenging animals and scavenging birds due to the higher summer temperatures	Harm to human health - from waste carried off site and faeces. Nuisance and loss of amenity.	Air transport and over land	n/a	n/a	**n/a**	None of the waste will attract scavanging animals/birds	n/a	n/a
Local human population	Long periods of hot and dry weather could lead to a drought thus reducing the water supply used to manage the site and put out any fire that may occur	Harm to human health - respiratory irritation and illness.	Air transport then inhalation.	Low	Low	**Low**	No water needed for site management and the FRS are responsible for ensuring the nearby hydrant is capable of putting out fires. Furthermore, due to the size of the stockpiles on the site, the amount of water required is minimal to put out a fire in the largest stockpile.	Ensure that stockpiles remain the same size to ensure that a minimal amount of firewater is required for the site	Low
Local human population	Potential increased use or reliance on mains water for dust suppression and cleaning and provision of fire water due to drier summers	Harm to human health - respiratory irritation and illness. Also nuisance, loss of amenity and harm to animal health	Air transport then inhalation or deposition	n/a	n/a	**n/a**	As above	As above	n/a
Staff, visitors, local human population	Lower winter temperatures could increase risk of pipework and other external equipment freezing	Danger to those on site through injury	Physical.	Very Low	Low	**Very Low**	The permitted area consists of wastes stored externally in bays or skips. The site operates in accordance with an inspection and maintenance procedure which involves routine inspections. These inspections are carried out daily by the site manager and weekly by the COTC holder. Where any damage is found, these shall be reported and repaired within set timescales	Ensure that management complies with the regular inspection and preventative maintenance of site, plant and equipment.	Very low

Local human population and local environment	Potential for increased site surface water and flooding	If waste is washed off site it may contaminate buildings / gardens / natural habitats downstream.	Flood waters	Very Low	Low	**Low**	The site is located within a Flood Zone 1, indicating that the land is assessed as having a 1 in 1000 or greater annual probability of river flooding (<0.1%). The risk of flooding is minimal, however shoult it occur, the site is entirely concreted with the wastes being contained in skips of bays. The site has drainage installed which runs to the site interceptor which will assist in any flooding on site. The hazardous waste present is coal tar which is classed as slightly soluble in water, therefore the impact will be minimal due to the low volume of waste on site	Maintain drainge and ensure that the concrete is in good condition across the site	Low
Local human population and local environment	There is potential for increased incidents involving water-reactive wastes	n/a	n/a	n/a	n/a	**n/a**	Non of the wastes on site are water-reactive	n/a	n/a
Local environment, groundwater, and nearby watersystems	There is potential increased impact of discharge to watercourse from on-site drainage systems where connected to water courses.	Unspended solids and increased turbidity, impact on water quality	Drainage system	n/a	n/a	**n/a**	Drainge isn't connected to water courses	n/a	n/a
Local environment, groundwater, and nearby watersystems	Potential for increased site surface water and flooding resulting in drainage systems and interceptors being overwhelmed.	Unspended solids and increased turbidity, impact on water quality	Drainage system	Very Low	Very Low	**Very Low**	Due to the small quantity of waste on site, the existing drainage system in place is suitable. As the site is located within a Flood Zone 1, the risk for increased surface water and flooding is minimal.	Should the site drainage and interceptor become overwhelmed, the site will review the drainage and interceptor to ensure that it can handle the surface water and flooding	Very low
Staff, visitors, local human population, any wildlife sites in the vicinity	If located near the coast, a site could experience increased corrosion due to increase in saltwater spray	n/a	n/a	n/a	n/a	**n/a**	The site is not located near the coast	n/a	n/a
Local human population and local environment	If a site is located near the coast there is potential increased risk of coastal flooding	If waste is washed off site it may contaminate buildings / gardens / natural habitats downstream.	Flood waters	n/a	n/a	**n/a**	The site is not located near the coast	n/a	n/a
Staff, visitors, local human population, and nearby animals	Potential for high winds to damage buildings and infrastructure and blow waste from the site.	Nuisance, loss of amenity and harm to animal health	Air transport then deposition	Low	Low	**Low**	All wastes are stored externally, with no operations occuring within any building. The site carries out inspections and maintenance which will ensure that any bays of perimeter fencing are suitable. The site has waste bays which help prevent wind whipping.	In the event of high winds, during the inspection and maintenance, infrastructure is reviewed to identify vulnerable areas to high winds and measures to protect them and mitigate any impacts from damage	Low

Staff, visitors, local human population	Potential for lightning strikes to damage buildings and infrastructure.	Nuisance, loss of amenity	Access to the site	Very Low	Very Low	**Very Low**	All wastes are stored externally, with no operations occuring within any building. The site carries out inspections and maintenance which will ensure that any damage to infrastructure is fixed.	During the inspection and maintenance, infrastructure is reviewed. Should lightning strikes become frequent, the site will look into installing lightning conductors.	Very low
Staff, visitors, local human population	Storms and high winds could damage building structures with increased potential for fugitive emissions.	n/a	n/a	n/a	n/a	**n/a**	All wastes are stored externally, with there being no potential for fugitive emissions	n/a	n/a

Yellow columns contain drop down menus that allow automatic evaluation of risk in green column