

KIBWORTH RECYCLING AND
HOUSEHOLD WASTE SITE


ENVIRONMENTAL RISK ASSESSMENT

LEICESTERSHIRE COUNTY COUNCIL

JULY 2021



SUMMARY TABLE	
SITE:	Kibworth Recycling and Household Waste Site – Environmental Risk Assessment
SITE ADDRESS:	Harborough Road, Kibworth, Leicestershire, LE8 0EX
CLIENT:	Leicestershire County Council
DATE:	July 2021
REFERENCE	IV.342.19
DEVELOPMENT PROPOSAL:	Operation of a Recycling and Household Waste Facility.

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Date:	July 2021	
Version:	3.0	



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1.0 Introduction

1.1 Report Context

This section of the Environmental Permit Application responds to Part C2 of the Environmental Permit application form, and specifically details the Environmental Risk Assessment (ERA) and associated mitigation management procedures for the activities undertaken on site.

This document has been prepared by Ivy House Environmental Limited (Ivy) on behalf of the Applicant, Leicestershire County Council (LCC) as part of the management for the proposed Kibworth Recycling and Household Waste Site at Harborough Road.

The Operator proposes to undertake the storage and transfer of various waste types as follows:

- Storage and Transfer of Green Waste;
- Storage and Transfer of Waste Electric and Electronic Equipment (WEEE);
- Storage and Transfer of Street Cleaning Residues;
- Storage and Transfer of Construction and Demolition Wastes;
- Storage and Transfer of Oils, Fats and Paints;
- Storage and Transfer of Acids and Solvents; and
- Storage and Transfer of 'other' Household Wastes.

The waste will be brought to the site via members of the public and via delivery vehicles. The waste materials will then be inspected and moved to the relevant storage areas.

It is proposed that there will be a total throughput of 75,000 tonnes per annum for the facility, with a daily waste acceptance limit of 400 tonnes which will be split between 350 tonnes of non-hazardous waste and 50 tonnes of hazardous waste.

Note that no more than 50 tonnes of hazardous wastes will be stored on the site at any one time. This document forms part of the site's Environmental Management System (EMS) and will be reviewed on an annual basis and in the event of any incidents.

2.0 SITE SETTING

2.1 Methodology

This report has been prepared in accordance with the Environment Agency's Risk Assessment guidance. It specifically relates to the potential risk associated with the following risk types:

- Odour;
- Noise and vibration;
- Fugitive Emissions; and
- Accidents and incidents.

This risk assessment addresses the above, and is based on the following methodology:

- Identification of potential sources of risk;
- Identification of all potential receptors to risk; and
- Risk assessment of each risk type.

The ERA is a tool used to identify the pollutant linkage i.e. source-pathway-receptor. For most risks, the atmosphere is the main pathway and will always exist. Therefore, the ERA deals primarily with the sources and receptors. The ERA (tables) provided in Appendix A is summarised below.

2.2 Sources

The potential sources of risks have been considered for each risk type, as shown in Appendix A (tables). The sources of risk for this application have been identified as:

Noise

- Plant and machinery;
- Vehicle movements to/from the site;
- Vehicle movements within the site; and
- Engineering works.

Fugitive emissions

- Odour;
- Particulate matter; (dust)
- Mud and litter; and
- Scavenging birds, pests and vermin.

Accidents

- Leaks/spillages;
- Fire or failure to contain firewater;
- Flooding; and
- Vandalism.

2.3 Pathways

The pathways have been identified for each risk type as shown below in Table 1:

Table 1: Potential Pathways

Risk Type	Pathway
Odour	Atmosphere
Noise	Atmosphere
Fugitive Emissions	Atmosphere
Accidents	Atmosphere
	Surface water run-off
	Infiltration
	Percolation

2.4 Receptors

Receptors within 1km of the proposed application boundary have been considered in the preparation of the Sensitive Receptors List as outlined within Table 2 below.

Table 2: Sensitive Receptors Located within close proximity of the Proposed Facility

ID on the Receptor Plan	Receptor	Direction from Operational Area	Minimum Distance from proposed permit boundary (m)
Designated ecological habitats e.g. Ramsars, SAC, SPA, SSSI			
-	-		
Other Designations e.g. National Parks, ANOB, World Heritage Sites			
-	-		
Historic buildings / listed buildings / archaeological sites			
-	-		
Domestic Dwellings			
1	Marriot Drive	NW	722m
2	Milestone Close	NW	827m
3	Braymish Close	NW	815m
4	Harborough Road	NW	750m
5	New Road	NW	911m
6	Fairway	NW	960m
7	Birdie Close	NW	915m
8	Wentworth Close	W	950m
Schools, Shops, Commercial and Industrial			
9	Kibworth Golf Club	SW	443m
10	Beech Tree Bunnies	SSE	768m
11	Unnamed Farm	SW	300m
12	Kibworth Gun Club	SE	500m
13	Premier Music International	NW	500m
14	ACI Financial	NW	487m
15	Readicut Crafts	NW	470m
17	Total Community Care	NW	487m
18	UK Property Finance	NW	493m
19	Cornerstone Tax Advisors	NW	501m
20	Jefferson Payroll Bureau	NW	510m
21	Secured-loans.co.uk	NW	496m
22	Creative World of Crafts	NW	508m
16	CLA UK	NW	519m
24	Crouch Recovery	NW	531m
25	Dynamic Wealth	NW	561m
26	Farleys	NW	625m
27	Spenders Motorcycles	NW	653m
30	Allotments	N	50m
29	Kemps Clothing	NW	850m
23	DD Automotive	NW	646m
Highway, Minor Road and Railway			
32	Harborough Road (A6)	S	10m
33	W Langton Road	N	125m
34	Railway	N	18m
Farmland			
31	Farmland	W	14m
31	Farmland	N	36m
31	Farmland	E	30m
31	Farmland	S	20m
31	Farmland	SE	65m
Local Wildlife Sites			
-	-		
Protected Species			

-	-		
Protected Habitats			
-	-		
Surface Water			
35	Langton Brook	S	950m
36	Drainage Channel flowing into the Langton Brook	NE	10m
Groundwater (sensitivity)			
In accordance with the MAGIC website, the site is not within a Groundwater Protection Zone.			

2.5 Risk Assessment

The ERA (Appendix A) looks at each specific hazard identified and assesses the likelihood of those hazards impacting on receptors. This is achieved by fulfilling the following objectives:

- Identify the location and nature of each hazard;
- Identify the specific receptors potentially at risk and assess the sensitivity of each receptor;
- Provide a qualitative assessment of the risk posed to each sensitive receptor;
- Identify management and monitoring techniques; and
- Provide recommendations for more detailed assessments where necessary.

2.6 Summary of ERA

The ERA (Appendix A) indicates that the proposed extension will have no significant impacts in terms of odour, noise and vibration, and fugitive emissions, and the likelihood of accidents is minimal.

Appendix A – Environmental Risk Assessment Tables

Appendix A - Table A: Odour Risk Assessment and Management Plan

What do you do that can harm and what could be harmed			Managing the Risk	Assessing the Risk		
Hazard	Receptor	Pathway	Risk Assessment	Probability of Exposure	Consequence	What is the overall risk?
What has the potential to cause harm?	What is at risk? What do I wish to protect	How could it get to the receptor?	What measures will you take to reduce the risk? If it occurs – who is responsible for what?	How likely is this contact?	What is the harm that can be caused?	What is the risk that still remains? The balance of probability and consequence.
<p>Transfer and Storage of Non-Hazardous Waste.</p> <p>General Site Operations.</p> <p>Failure of plant and equipment.</p>	<p>Occupiers of domestic dwellings in Table 2.</p> <p>Commercial and Industrial premises in Table 2.</p> <p>Users of the A6.</p>	Atmosphere.	<p>Please see the sites dedicated odour management plan which has been submitted with this application (Appendix E).</p> <p>In summary the site will utilise the following measures to protect receptors against odours from site operations:</p> <ul style="list-style-type: none"> • Strict waste acceptance procedures; • Fast turnaround times for odour producing materials; • Use of first in, first out principles; • Use of storage containers/tanks for odour producing materials; • Use of covers over bays for odour producing materials; • Incidental food waste wastes will be stored in enclosed compactor containers; • Bulky household waste will be stored in open top containers under the canopy • Routine cleaning of bays, skips, tanks and equipment; and • Regular plant maintenance. 	Unlikely due to control measures that will be put in place.	Odour annoyance	Not significant due to the nature of the waste types and the management techniques employed.

<p>Transfer and Storage of Hazardous Waste.</p> <p>General Site Operations.</p> <p>Failure of plant and equipment.</p>	<p>Occupiers of domestic dwellings in Table 2.</p> <p>Commercial and Industrial premises in Table 2.</p> <p>Users of the A6.</p>	<p>Atmosphere.</p>	<p>Please see the sites dedicated odour management plan which has been submitted with this application (Appendix E).</p> <p>In summary the site will utilise the following measures to protect receptors against odours from site operations:</p> <ul style="list-style-type: none"> • Hazardous waste will be stored separately from non-hazardous wastes with a separate sealed drainage system, i.e. engine/cooking oil will be stored in double skinned tanks, asbestos will be stored in an enclosed container and other hazardous waste e.g. certain WEEE is stored under canopy; • Strict waste acceptance procedures; • Fast turnaround times for odour producing materials (maximum 5 days); • Use of storage containers/tanks for odour producing materials; • Use of first in, first out principles; • Use of covers over bays/skips for odour producing materials; • Routine cleaning of bays, skips, tanks and equipment; and • Regular plant maintenance. 	<p>Unlikely due to control measures that will be put in place.</p>	<p>Odour annoyance.</p>	<p>Not significant due to the nature of the waste types and the management techniques employed.</p>
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Table B: Noise Risk Assessment and Management Plan

What do you do that can harm and what could be harmed			Managing the Risk	Assessing the Risk		
Hazard	Receptor	Pathway	Risk Assessment	Probability of Exposure	Consequence	What is the overall risk?
What has the potential to cause harm?	What is at risk? What do I wish to protect	How could it get to the receptor?	What measures will you take to reduce the risk? If it occurs – who is responsible for what?	How likely is this contact?	What is the harm that can be caused?	What is the risk that still remains? The balance of probability and consequence.
<p>Transfer and Storage of Non-Hazardous Waste</p> <p>General Site Operations.</p> <p>Failure of plant and equipment.</p>	<p>Occupiers of domestic dwellings in Table 2.</p> <p>Commercial and Industrial premises in Table 2.</p> <p>Users of the A6.</p>	Atmosphere.	<p>Please see the sites dedicated noise management plan which has been submitted with this application (Appendix F).</p> <p>In summary the site will utilise the following measures to protect receptors against noise from site operations:</p> <ul style="list-style-type: none"> • Strict adherence to the sites operating hours of 06:00 – 20:00; • Minimisation of drop heights when loading and unloading wastes; • Encasement of pumps and other noise producing machinery; • Use of mufflers where appropriate; • Low level reversing alarms; • Good housekeeping measures; • Routine inspection and maintenance of equipment, and; • Routine inspection and maintenance of site roading. 	Unlikely due to control measures that will be put in place.	Noise annoyance.	Not significant due to the nature of the waste types and the management techniques employed.
Transfer and Storage of	Occupiers of domestic	Atmosphere	Please see the sites dedicated noise management plan which has been submitted	Unlikely due to control measures	Noise annoyance.	Not significant due to the

<p>Hazardous Waste</p> <p>General Site Operations.</p> <p>Failure of plant and equipment.</p>	<p> dwellings in Table 2.</p> <p>Commercial and Industrial premises in Table 2.</p> <p>Users of the A6.</p>		<p>with this application (Appendix F).</p> <p>In summary the site will utilise the following measures to protect receptors against noise from site operations:</p> <ul style="list-style-type: none"> • Strict adherence to the sites operating hours of 06:00 – 20:00; • Minimisation of drop heights when loading and unloading wastes; • Encasement of pumps and other noise producing machinery; • Use of mufflers where appropriate; • Low level reversing alarms; • Good housekeeping measures; • Routine inspection and maintenance of equipment, and; • Routine inspection and maintenance of site roading. 	<p>that will be put in place.</p>		<p>nature of the waste types and the management techniques employed.</p>
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Table C: Fugitive Emissions Risk Assessment and Management Plan

What do you do that can harm and what could be harmed			Managing the Risk	Assessing the Risk		
Hazard	Receptor	Pathway	Risk Assessment	Probability of Exposure	Consequence	What is the overall risk?
What has the potential to cause harm?	What is at risk? What do I wish to protect	How could it get to the receptor?	What measures will you take to reduce the risk? If it occurs – who is responsible for what?	How likely is this contact?	What is the harm that can be caused?	What is the risk that still remains? The balance of probability and consequence?
To Air						
Transfer and Storage of Non-Hazardous Wastes. General Site Operations. Failure of plant and equipment.	Occupiers of domestic dwellings in Table 2. Commercial and Industrial premises in Table 2. Users of the A6.	Atmosphere	Please see the sites dedicated Dust Management Plan has been submitted with the Application (see Appendix G). In summary the site will utilise the following measures to protect receptors against dust from site operations: <ul style="list-style-type: none"> • Good housekeeping (keeping equipment clean); • Waste containers and bays which could give rise to dust will be canopied or covered; • Minimisation of drop heights when loading and unloading wastes; • Routine maintenance and cleaning of site roads; • Routine maintenance and cleaning of waste storage areas to prevent the build-up of dust; • Routine maintenance of plant and equipment in accordance with the 	Unlikely due to control measures that will be put in place.	Dust annoyance	Not significant due to the nature of the waste types and the management techniques employed.

			<p>manufacturer's instructions;</p> <ul style="list-style-type: none"> • Use of site water to dampen stockpiles or haul roads as required; and • Daily inspections and visual dust monitoring 			
<p>Transfer and Storage of Hazardous Wastes</p> <p>General Site Operations.</p> <p>Failure of plant and equipment.</p>	<p>Occupiers of domestic dwellings in Table 2.</p> <p>Commercial and Industrial premises in Table 2.</p> <p>Users of the A6.</p>	Atmosphere	<p>Please see the sites dedicated Dust Management Plan has been submitted with the Application (see Appendix G).</p> <p>In summary the site will utilise the following measures to protect receptors against dust from site operations:</p> <ul style="list-style-type: none"> • Good housekeeping (keeping equipment clean); • Waste containers and bays which could give rise to dust will be canopied or covered; • Minimisation of drop heights when loading and unloading wastes; • Routine cleaning of site roads; • Routine cleaning of waste storage areas to prevent the build-up of dust; • Routine maintenance of plant and equipment in accordance with the manufacturer's instructions; • Use of site water to dampen stockpiles or haul roads as required; and • Daily inspections and visual dust monitoring. 	Unlikely due to control measures that will be put in place	Dust annoyance	Not significant due to the nature of the waste types and the management techniques employed.
To Water						
Runoff from storage areas.	<p>Groundwater</p> <p>Surface water</p>	Direct surface water runoff from site	The site will undertake the following to minimise the impacts from activities on surface water and groundwater:	Unlikely due to control measures that will be put in	Contamination of surface water and groundwater	Not significant due to the nature of the waste types

		<p>Infiltration Percolation</p>	<ul style="list-style-type: none"> • Hazardous and non-hazardous wastes will be stored separately within separate sealed drainage systems, i.e. engine/cooking oil will be stored in double skinned tanks, asbestos will be stored in an enclosed container and other hazardous waste e.g. certain WEEE is stored under canopy; • All storage areas will be fully concreted with sealed drainage; • Relevant storage areas where leachate could be produced, including the quarantine area will be provided with either canopies or covers to prevent rainwater mixing with wastes; • Regular inspections will be undertaken, checking for cracks in the concrete pads where waste is handled or stored; • Regular maintenance and checks will be undertaken on tanks and associated bunds; and • Drains will be routinely inspected and cleaned. <p>The Recycling Operatives will undertake regular inspections of site drains. All site operatives will be vigilant and report any problems to the Area Supervisor.</p>	<p>place</p>	<p>bodies. Enrichment of surface water and groundwater bodies. Flooding of local habitats</p>	<p>and the management techniques employed.</p>
Pests/ Scavenging birds						
<p>Birds and Pests</p>	<p>Occupiers of domestic dwellings in Table 2. Commercial and Industrial</p>	<p>Air and ground.</p>	<p>The site will undertake the following measures to minimise the impact of pests on the surrounding environment:</p> <ul style="list-style-type: none"> • All wastes which are likely to attract pests or birds will be stored within sealed containers or covered areas; 	<p>Unlikely due to control measures that will be put in place</p>	<p>Nuisance to local businesses. Predation of habitats.</p>	<p>Not significant due to the nature of the waste types and the management techniques</p>

	premises listed in Table 2.		<ul style="list-style-type: none"> • Regular housekeeping will be undertaken, including the cleaning of all waste storage areas on a regular basis with appropriate cleaning materials; • Incidents and maintenance measures (e.g. regarding traps) will be recorded in the site condition log; • All site infrastructure will be subject to a regular inspection schedule to ensure that there are no obvious weak areas of the containment measures where pests or vermin could infiltrate; • Any wastes which are received that are already infested will be removed from site as a priority (unless the vermin/birds/pests can be appropriately eradicated); and • The Area Supervisor may employ a pest exterminator if required. <p>The Recycling Operatives will undertake regular reviews of pests and scavenging birds at the site. All site operatives will be vigilant and report any problems to the Area Supervisor.</p>			employed.
Mud						
Mud and litter on local highways and roads.	Users of local highways and roads.	Tracked on vehicle wheels.	<p>All incoming waste via HGVs and outgoing wastes will be contained, sheeted, netted or covered to prevent any load loss.</p> <p>Mud and litter on local roads will be visually monitored. All site operatives will be required to be vigilant and report any mud on the roads to the Area Supervisor.</p> <p>If required, a road sweeper will be contracted to clean the site access road.</p>	Unlikely due to control measures that will be put in place.	Local nuisance. Mud on roads is unsightly and can increase the likelihood of road traffic accidents.	Not significant due to the nature of the waste types and the management techniques employed.

Litter						
Windblown litter.	Occupiers of domestic dwellings in Table 2. Commercial and Industrial premises listed in Table 2.	Air then deposition.	<p>Strict waste acceptance procedures will be in place to minimise the risk of non-compliant wastes being accepted in accordance with the permit application.</p> <p>Site operatives will be vigilant and report any litter problems to the Area Supervisor.</p> <p>In the event that litter is generated by site activities, the Area Supervisor will implement a litter collection as necessary.</p>	Unlikely due to control measures that will be put in place.	Local nuisance.	Not significant due to the nature of the waste types and the management techniques employed.

Table D: Accidents Risk Assessment and Management Plan

What do you do that can harm and what could be harmed			Managing the Risk	Assessing the Risk		
Hazard	Receptor	Pathway	Risk Assessment	Probability of Exposure	Consequence	What is the overall risk?
What has the potential to cause harm?	What is at risk? What do I wish to protect	How could it get to the receptor?	What measures will you take to reduce the risk? If it occurs – who is responsible for what?	How likely is this contact?	What is the harm that can be caused?	What is the risk that still remains? The balance of probability and consequence.
Fire or failure to contain firewater.	Occupiers of domestic dwellings listed in Table 2. Industrial and Commercial premises listed in Table 2. Users of the A6.	Atmosphere. Surface water run-off.	Please see the sites dedicated Fire Prevention Plan provided with this application (Appendix H). In summary the following measures will be undertaken to prevent fires on the site: <ul style="list-style-type: none"> Separate drainage systems will be given for hazardous and non-hazardous wastes, i.e. engine/cooking oil will be stored in double skinned tanks, asbestos will be stored in an enclosed container and other hazardous waste e.g. certain WEEE is stored under canopy; Waste will be stored for no longer than 6 months; Stockpiles will be no more than 300m³, Stockpile heights will be no more than 4m in height; Relevant stockpiles (i.e. green waste) will be monitored using temperature probes; Fire water will be provided by the fire hydrant at the entrance to the site; 	Unlikely due to control measures that will be put in place.	Local nuisance from smoke. Contamination of local groundwater and surface water. Damage to infrastructure.	Not significant due to the nature of the waste types and the management techniques employed. The waste types are not considered to be combustible in accordance with the Environment Agency's 'FPP' guidance updated 11 th January 2021.

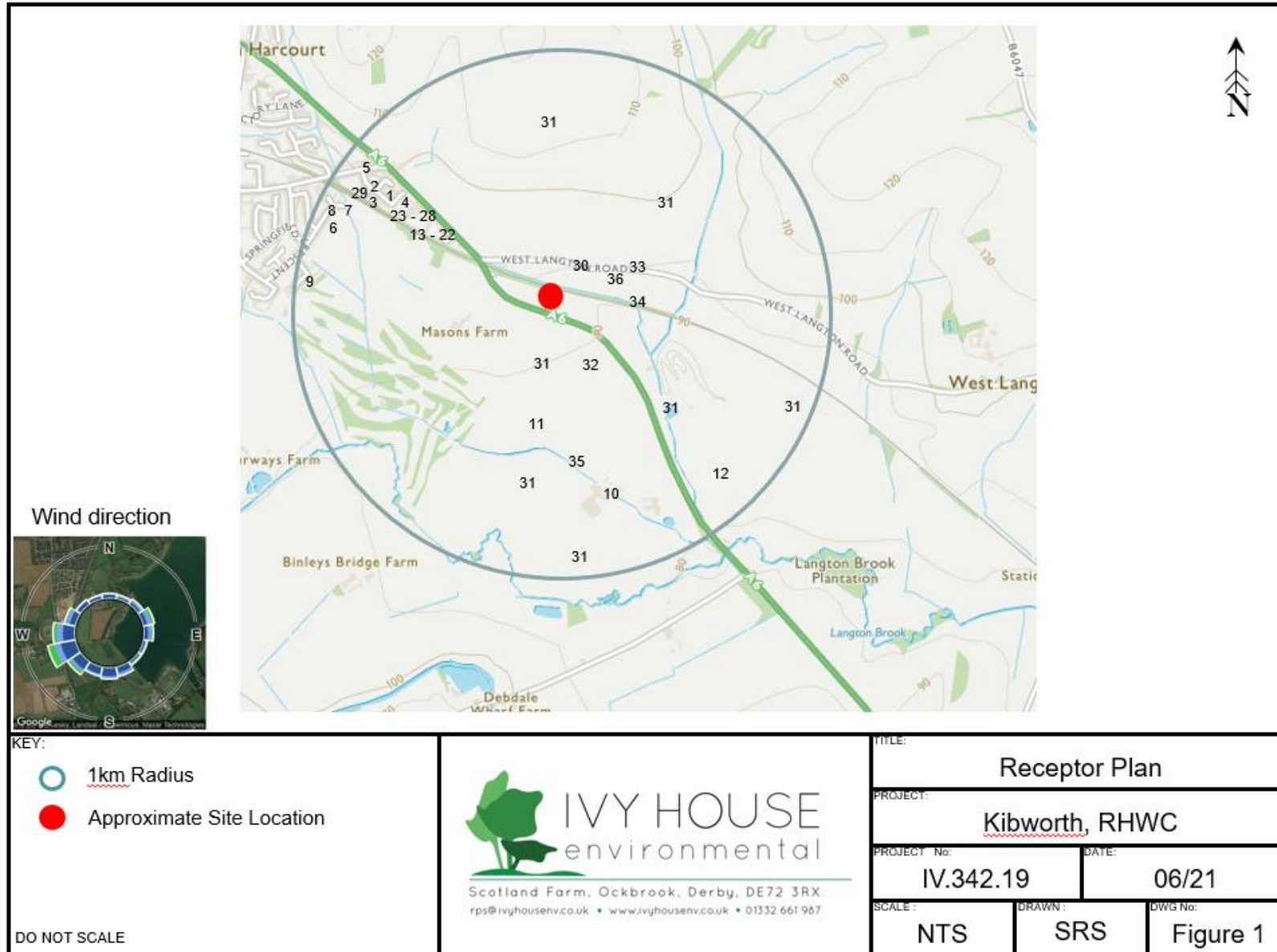
			<ul style="list-style-type: none"> • Provision of fire hydrants and firefighting equipment; • Fire water will be collected in the underground attenuation tank; • Hot works will not be undertaken within areas which are storing wastes; • Provision of a quarantine area; and • Fire safety awareness and training for all staff. <p>Site staff will remain vigilant and in the event of any fires, will adhere to the Fire Prevention Plan.</p>			
Plant failure and breakdown	<p>Occupiers of domestic dwellings listed in Table 2.</p> <p>Surface water features listed in Table 2.</p>	<p>Atmosphere.</p> <p>Surface water run-off.</p>	<p>All plant will be checked on a daily basis. Any issues with plant will be reported immediately to the Area Supervisor.</p> <p>A programme of planned preventative maintenance will be put in place and all plant and equipment will be subject to regular maintenance in accordance with the manufacturer's guidance.</p> <p>The site may keep backups of important plant so that minimal disruption will be experienced in the event of plant failure or breakdown.</p> <p>In the event of a prolonged plant failure that could lead to environmental pollution, the Area Supervisor may decide to divert incoming wastes if there is not enough storage tonnage available on site.</p> <p>In addition to the above, the Area Supervisor may determine that the site should temporarily shut down and all waste on site</p>	Unlikely due to management practices to be put	<p>Pollution of air.</p> <p>Contamination of local groundwater and surface water.</p>	Not significant due to the management techniques employed.

			should be diverted to another facility or onwards recovery or disposal. If this decision is implemented, the Environment Agency would be consulted and records kept of where wastes have been sent.			
Leaks and Spillages from plant	Groundwater. Surface water identified in Table 2.	Percolation and run off	<p>Regular maintenance will be undertaken on all plant and equipment in accordance with the manufacture's guidance.</p> <p>Daily vehicle / plant checks will be undertaken to ensure that any oil/fuel leaks etc. are repaired as soon as possible.</p> <p>Spill kits will be provided and staff will be fully trained on how to use spill kits.</p> <p>In the event of a spill or leak that could compromise the sites infrastructure or cause risk to the environment, the Area Supervisor shall be informed. If necessary, works shall cease while measures are put in place to remediate the leak or spill and the Environment Agency will be informed.</p>	Unlikely due to management practices to be put	Pollution of local groundwater and surface water features.	Not significant due to the management techniques employed.
Flooding	Groundwater. Surface water identified in Table 2 Surrounding commercial and industrial premises. Users of the A6.	Percolation.	<p>The site is situated within a Flood Zone 1, which is a site that has a 'Very Low' chance of flooding in any given year i.e. less than 1 in 1,000.</p> <p>The site has been designed in such a way as to prevent the ingress of any flood waters. If the site is to flood, then the water will be collected in the underground storage tank and may be discharged to the drain leading to the Langton Brook or tankered off site.</p> <p>In the event that significant flooding occurs,</p>	Unlikely due to management practices to be put	Pollution of local groundwater and surface water features.	Not significant due to the management techniques employed.


			<p>site operations may temporarily cease and any incoming vehicles will be diverted to prevent the risk of any additional wastes coming into contact with flood waters.</p> <p>Existing waste which is stored may be diverted to another facility if this waste could cause pollution in the event of a flood – this will be at the discretion of the Area Supervisor.</p>			
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Appendix B – Permit Boundary and Site Layout (Under Separate Cover)

Appendix C – Receptor Plan



Receptor ID	Receptor	Receptor ID	Receptor	Receptor ID	Receptor
Domestic Dwellings		Schools, Shops, Commercial and Industrial		Highway, Minor Road and Railway	
1	Marriot Drive	17	Total Community Crae	32	Harborough Road (A6)
2	Milestone Close	18	UK Property Finance	33	W Langton Road
3	Braymish Close	19	Cornerstone Tax Advisors	34	Railway
4	Harborough Road	20	Jefferson Payroll Bureau	Surface Water	
5	New Road	21	Secured-loans.co.uk	35	Langton Brook
6	Fairway	22	Creative World of Crafts	36	Drainage Channel which flows to the Langton Brook
7	Birdie Close	23	DD Automotive		
8	Wentworth Close	24	Crouch Recovery		
Schools, Shops, Commercial and Industrial		25	Dynamic Wealth		
9	Kibworth Golf Club	26	Farleys		
10	Beech Tree Bunnies	27	Spenders Motorcycles		
11	Unnamed Farm	28	Horsewear House Ltd		
12	Kibworth Gun Club	29	Kemps Clothing		
13	Premier Music International	30	Allotments		
14	ACI Financial	Farmland			
15	Readicut Crafts	31	Farmland		
16	CLA UK				



KEY:

DO NOT SCALE



TITLE: Receptor Table		
PROJECT: Kibworth, RHWC		
PROJECT No: IV.342.19	DATE: 06/21	
SCALE: NTS	DRAWN: SRS	DWG No: Figure 2