Caulmert Limited

Engineering, Environmental & Planning Consultancy Services

Bletchley Waste Processing Facility

FCC Waste Services (UK) Limited

Environmental Permit Variation Application

Environmental Risk Assessment

Prepared by:

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Director of Environment

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Approved

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Environmental Risk Assessment

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1.0 INTRODUCTION

1.1 Overview

- 1.1.1 FCC Waste Services (UK) Limited (a wholly owned subsidiary of FCC Environment (UK) Limited), have appointed Caulmert Limited to prepare an environmental permit variation application to vary the existing Bletchley Waste Processing Facility permit ref. EPR/FB3530RC, to add a Section 5.3A(1)(a)(ii) activity to include for the treatment of up to XX,XXX tonnes per year of hazardous asbestos-impacted soils by pre-screening and removing visible bound asbestos fragments within the existing Waste Processing Facility building. It is proposed to store up to 5,85 nnes of hazardous asbestos impacted soils at any one time within the building.
- 1.1.2 There are no proposed changes to the Bletchley Waste Processing Facility permit boundary or current permitted activity or tonnages at the Waste Processing Facility as part of this application.
- 1.1.3 This report is an Environmental Risk Assessment which forms part of the environmental permit variation application for Bletchley Waste Processing Facility.
- 1.1.4 This risk assessment considers any potential risks associated with the proposed activity. It is expected that the risks will be low (with controls in place) with respect to odour, pests, dust, litter, noise, and other fugitive emissions from site operations.
- 1.1.5 This risk assessment has been compiled in accordance with the current Environment Agency guidance 'Risk Assessments for your Environmental Permit' (last updated 21st November 2023).

1.2 Site Setting and Location

- 1.2.1 Bletchley Waste Processing Facility ('the Site') is located adjacent to FCC-operated Bletchley Landfill Site, and both are accessed off Guernsey Road in Bletchley, Milton Keynes (see Figure 1 below). The site is centred on National Grid Reference SP 86845 32152 and the postcode for the site is MK3 5JU.
- 1.2.2 The Site is located to the south of Milton Keynes on the urban fringe, approximately 270m west of the residential area of Water Eaton, 350m north of Newton Leys, 950m south of Bletchley and around 6km south of the centre of Milton Keynes.
- 1.2.3 The Site is situated within the area designated the 'Main Line' Local Wildlife Site (LWS) and the Site is also located 30m immediately south of the designated 'Blue Lagoon' Local Nature Reserve (LNR) and Local Wildlife Site (LWS). No other designated sites within 2km.



Figure 1 – Site Location Plan

1.3 Existing Site Operations

1.3.1 The Site currently has a waste operation permit ref. EPR/FB3530RC for the operation of a non-hazardous household, commercial and industrial waste transfer station, managed by FCC Waste Services (UK) Limited. The operations under this activity include physical treatment of wastes (manual sorting, separation, screening, baling, shredding, crushing and compaction) within the building and storage of recyclables ready for export, and also bulking of residual organic fractions for use as RDF off-site. These operations are no longer active at the Site, but the operator wishes to retain this activity on the permit for potential future use.

1.4 Proposed Site Operations

1.4.1 As part of this permit variation application, the Operator proposes to add a new listed Section 5.3 activity to Table S1.1 of the permit for the physico-chemical treatment of more than 10 tonnes per day of hazardous asbestos-contaminated soils. This activity, along with the temporary storage of the hazardous soils (Section 5.6 activity) is to be undertaken within the existing building, which provides shelter from the weather and already has impermeable paving and sealed drainage installed.

1.4.2 Hazardous soils containing bonded asbestos debris will undergo pre-acceptance checks, a prescreening process and hand-picking of asbestos cement fragments, before being tested and then used in restoration of Bletchley Landfill.

Screening Operations

- 1.4.3 A mechanical screener will be used to remove oversize material from asbestos cement containing soils. Soils will be screened using a three-way screener. The screened material is then passed through the picking station to allow the removal of any bound asbestos debris. This is to remove larger items (e.g. lumps of concrete) to reduce the potential of damage to the picking station and make hand picking of asbestos debris more effective.
- 1.4.4 The screener currently being used under the mobile plant deployment at Maw Green is unmodified. Trials on enclosed screeners with a HEPA filter and uncovered screeners with general dust suppression have shown no difference in emissions as they all meet the method detection limit of <0.0005f/ml. However, the use of enclosed screeners is far slower, prone to significant downtime and uses significantly more energy due to reduced throughput for no environmental benefit. The use of standard dust suppression with a propriety surfactant has been shown to be entirely effective as secondary mitigation to the waste acceptance criteria.
- 1.4.5 Where SEM testing is undertaken this will ensure that the asbestos concentrations in air are below 0.0005f/ml. This approach and reduced detection limit for the asbestos monitoring meets the well-established principle of reducing emissions to be as low as reasonably practicable.

Asbestos Picking Station

- 1.4.6 The asbestos picking station will be a mobile enclosed unit and will be identical to the type approved for use under an environmental permit at the operator's other sites.
- 1.4.7 Airborne asbestos concentrations have been monitored both within, and directly adjacent to the picking station at the operator's other sites. There is no increase in asbestos concentrations above the method detection limit of either <0.01f/ml or <0.0005f/ml within the internal atmosphere of the soil screeners or picking stations monitored, nor ambient air immediately outside of the screener/picking station. This monitoring has been undertaken since the operator commenced the treatment of bound asbestos contaminated soils. All air monitoring data has been submitted to the Environment Agency and approved as being compliant with the site's permit for each site (existing Maw Green Landfill Mobile Plant and Edwin Richards Quarry Mobile Plant).
- 1.4.8 Notwithstanding the evidence that there are no elevated airborne asbestos emissions within the screening plant or picking stations of the above sites, as an additional control measure, there will be a series of spray rails on the incoming and outgoing conveyor to effectively capture and contain particulate emissions. This would act as secondary containment for any particulate emissions.

- 1.4.9 The operations are to be undertaken within the existing building purely as a convenient use of existing space and shelter from the weather, with the proposed control measures to prevent release of airborne asbestos proven to be effective at other sites and the building is not intended to be a primary control measure for preventing airborne asbestos emissions leaving the site.
- 1.4.10 The out-going conveyor will drop the hand-picked picked processed soils, and the drop height will be minimised to reduce any agitation of the soils. A dust suppression system (using a water and proprietary asbestos surfactant solution) will be in place at the site that will consist of misting sprays with overlapping spray arcs, identical to the approved suppression system on the operator's other sites that can be used to continually dampen stockpiles during loading and unloading activities.
- 1.4.11 The process in the picking station will involve a manual sorting process by trained operatives who will remove visible fragments of asbestos from the materials from the conveyor. Asbestos picked from the conveyor will be placed by hand in individual polythene bags located inside the picking station beside the trained operatives. When the bags are either full, or the end of the working day is achieved, the polythene bag will be placed into a second bag and sealed using a taped swan neck. The double bagged asbestos will be taken outside and placed by hand into the on-site enclosed lockable asbestos skip. Used PPE from the picking station and direct working areas will be double bagged using the same approach as asbestos containing material (ACM) debris and placed into the enclosed lockable asbestos skip.
- 1.4.12 A Category B trained supervisor will regularly check the labelled, lockable asbestos waste skip and will arrange for the collection and delivery of new asbestos skips when the existing skip has reached 75% capacity. This is to ensure that there is no risk of the skip becoming over capacity and unable to accept further bagged asbestos. This will form part of the daily site checks.

Post-treatment Storage and Verification

- 1.4.13 The out-going conveyor from the asbestos picking station will deposit the hand processed soils into a separate stockpile labelled as treated soils. The stockpile within this designated area will then undergo further visual inspection by the suitably trained/qualified member of staff for any residual asbestos containing fragments. If any bonded asbestos fragments are encountered, the materials will be re-loaded into the asbestos picking station and processed until no visible bonded asbestos fragments are observed through visual inspection.
- 1.4.14 The materials will then undergo 'Post Treatment Verification Sampling' testing and sampling will confirm that treated soils meet the restoration soil quality targets to enable their use in the restoration area of Bletchley Landfill Site. If, after the receipt of laboratory analysis results, the soils do not meet the acceptance criteria, the soils will either be treated further or removed from site to an alternative disposal facility.
- 1.4.15 Following screening, the soils will be stockpiled for use in recovery at the landfill site.

2.0 SENSITIVE RECEPTORS

2.1 Background

- 2.1.1 This report assesses the potential risks to nearby sensitive receptors from the permit variation proposals at Bletchley Waste Processing Facility. A sensitive receptor search was conducted of the surrounding area within a 1km radius of the Site boundary using Defra's Magic Maps website¹ and the sensitive receptors identified are listed below in Table 1 and also shown on the 'Sensitive Receptor Plan' drawing ref. 6089-CAU-XX-XX-DR-V-1800. The approximate distance to each receptor is measured from the Site boundary.
- 2.1.2 As part of the Pre-Application Advice stage, the Environment Agency (EA) conducted a Nature and Heritage Conservation Screening Report and identified 1 Local Nature Reserve (Blue Lagoon), 2 Local Wildlife Sites (Main Line & Blue Lagoon), 1 protected species (non-fish) and 1 protected habitat (deciduous woodland) within 2km of the site. These are listed in the attached EA report in Appendix 1. The relevant sites identified by the EA are also listed in Table 1 below.
- 2.1.3 The closest human receptors to the site are workers and visitors to Bletchley Landfill Site and users of the offices/access road (<10m to west and north). These are however industrial receptors, and the landfill is operated by the same operator (FCC) therefore they will be less sensitive to emissions such as noise, vibration, and dust from the facility.
- 2.1.4 The nearest residential receptors to the site are houses in the residential areas of Water Eaton (270m east of the site boundary), Newton Leys (350m south) and Bletchley (950m north).
- 2.1.5 There are numerous schools and playing fields within 1km of the Site including a playing field 50m south of the Site, Leon School and Sports Site (270m east), Drayton Park School (540m east-northeast), Water Hall Primary School (715m southeast), Bishop Parker Catholic School and Nursery (700m northeast), and The Premier Academy and Eaton Mill Nursery (990m northeast). Lakeview Lodge Care Home is located 615m southeast of the Site.
- 2.1.6 The nearest medical facility, Water Eaton Health Centre is located 635m southeast of the Site boundary. There are no hospitals within 1km of the site.
- 2.1.7 A railway line (oriented north to south) is located 190m east of the Site boundary and another railway line (oriented east to west) is located 900m north of the Site boundary, both meeting at a junction in Bletchley. The Jubilee Brook runs along the side of the railway north-south approximately 175m east of the Site boundary. Further afield is The Grand Union Canal located over 1km east of the Site, and the River Ouzel 1.1km east.
- 2.1.8 The site is not located within a Source Protection Zone (SPZ), with the closest, a Zone III (Total Catchment), located over 3.7km to the east of the Site. The site is located on a Secondary

¹ DEFRA Magic Maps 2023: <u>https://magic.defra.gov.uk/MagicMap.aspx</u>

(undifferentiated) Aquifer within the superficial deposits, with no aquifer designation for the bedrock below the site.

2.1.9 The site is within a Flood Zone 1 according to the GOV.UK Flood Risk Maps website, which indicates that the site has a very low probability of flooding (less than 0.1% chance of flooding each year) from rivers and the sea.

2.2 Designated Sites of Ecological Importance & Other Habitats

- 2.2.1 A search of the surrounding area using the DEFRA Magic Maps website has established there are none of the following sites within 2km: Areas of Outstanding Natural Beauty (AONBs), National Nature Reserves (NNRs), Ramsar Sites, Sites of Special Scientific Interest (SSSIs), Special Areas of Conservation (SACs), Special Protection Areas (SPAs), World Heritage Sites, Scheduled Monuments or Ancient Woodland. The closest NNR is King's Wood and Rushmere NNR over 4.8km southeast and the closest SSSI is Howe Park Wood SSSI located 3.7km northwest.
- 2.2.2 The deciduous woodland immediately south and 30m north of the Site designated as a Priority Habitat, meaning it has been deemed to be of principal importance for the purpose of conserving biodiversity.

2.3 Summary

2.3.1 The sensitive receptors identified within 1km of the Site boundary are presented in Table 1 below:

Receptor	Туре	Distance/Direction
Main Line	Local Wildlife Site	On-Site
Protected Species (non-fish)	Protected Species	On-Site
Deciduous Woodland	Protected/Priority Habitat	<10m S & 30m N
Workers and Visitors to Bletchley Landfill Site	Industrial	<10m to west and north
Blue Lagoon & Woodland	Local Nature Reserve & Local Wildlife Site & Surface Water	30m N
Users of playing field & Newton Leys Pavilion	Residential/Recreational	50m S
Pond	Surface Water	65m SE
Jubilee Brook	Surface Water	175m E
Users of railway line	Commercial/Industrial	190m E
Residential area of Water Eaton	Residential	270m E
Leon School and Sports Site	Educational	270m E

Table 1 – Summary of Sensitive Receptors within 1km of the site boundary

Receptor	Туре	Distance/Direction
Businesses within units of Bletchley Business Campus off Barton Road	Commercial/Industrial	330m NE
Residential area of Newton Leys	Residential	350m S
Little Willow Lake	Surface Water	450m SE
Taylor Whimpey Offices	Commercial	500m SE
Drayton Park School	Educational	540m ENE
Lakeview Lodge Care Home	Residential	615m SE
Water Eaton Health Centre	Residential	635m SE
ASDA Supermarket	Commercial	665m SE
Bishop Parker Catholic School and Nursery	Educational	700m NE
Water Hall Primary School	Educational	715m SE
Costa Coffee/Dominoes Pizza/rows of other shops	Commercial	715m SSE
Turing Key Pub	Commercial/Recreational	800m SE
Willow Lake	Surface Water	885m S
Users of railway line	Commercial/Industrial	900m N
Selbourne Avenue Cemetery	Residential	930m NW
Residential area of Bletchley	Residential	950m N
The Premier Academy and Eaton Mill Nursery	Educational	990m NE
The Grand Union Canal	Surface Water	1km E
Sports Facility	Recreational	1km NW
Users of A4146 road	Public road	1km SE

2.4 Meteorological Setting

- 2.4.1 Fugitive emissions of dust, litter, odour and noise from the site are likely to be affected by local weather conditions, in particular by wind direction. Wind statistics observed from Cranfield/Marston Moretaine weather station, the closest weather station actively recording wind statistics, are considered to be representative of the typical conditions at the site (Figure 2 below). Cranfield/Marston Moretaine weather station weather station is located 13km to the northeast of the Site.
- 2.4.2 A review of the data recorded daily between February 2009 and January 2024 on the Windfinder.com² website indicates that the most dominant wind direction is from the southwest towards the northeast. With reference to the above Table 1 of sensitive receptors, predominant annual wind conditions are likely to blow towards the residential properties located in Water Eaton and the business park off Barton Road to the northeast of the Site.



Monthly wind direction and strength distribution

Figure 2 – Cranfield/Marston Moretaine weather station wind statistics 2009-2024

² <u>https://www.windfinder.com/windstatistics/cranfield_marston_moretaine</u>

3.0 RISK ASSESSMENTS

3.1 Assessments for the Proposed Operations

3.1.1 Risk assessment tables have been completed for odour, noise and vibration, fugitive emissions (dust, litter, mud and debris, pests, surface water run-off), visible plumes, release of bioaerosols and accidents in line with the GOV.UK guidance on 'Risk assessments for your environmental permit' (last updated 21st November 2023).

3.2 Risk Assessments - Tables

- 3.2.1 Possible hazards as a result of operations at the site that require risk assessment include:
 - Odour (Table 2);
 - Noise and Vibration (Table 3);
 - Fugitive Emissions (dust, litter, mud and debris, pests, surface water run-off) (Table 4);
 - Visible Plumes (smoke or visible plumes) (Table 5);
 - Release of Bioaerosols (Table 6);
 - Accidents (leaks and spillages, fire and flooding) (Table 7).
- 3.2.2 The hazards identified above have the potential to escape beyond the site boundary and cause an amenity nuisance to sensitive receptors or harm the environment and human health. For each possible hazard, an assessment of the risk that it poses to potential sensitive receptors has been carried out, taking into account the control measures that will be in place.
- 3.2.3 The following Tables 2 to 7 give further detail on each hazard source, pathway and sensitive receptor, the risk management measures to be implemented, probability of exposure, consequences of exposure and an overall risk rating from Low (little or no risk) to High (high risk) once all risk management measures have been taken into account.

Table 2 – Odour Risk Assessment

What do you do that can harm and what could be harmed		Managing the risk	Assessing the risk			
Hazard	Receptor	Pathway	Risk management	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 can the hazard 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
Odour from the reception, storage, handling and treatment of asbestos contaminated soils.	Workers and visitors to the adjacent Bletchley Landfill Site. Users of playing field & Newton Leys Pavilion 50m S Residential area of Water Eaton 270m E and Newton Leys 350m S Leon School and Sports Site 270m E Businesses within units of Bletchley Business Campus off Barton Road 330m	By air	 Asbestos-contaminated soils unlikely to be a source of odours. Preventative measures include: Waste types to be accepted of asbestos contaminated soils not inherently odorous in nature. Strict waste acceptance measures will ensure that odorous soils are not accepted and if found are rejected from site. All waste reception, storage and treatment activities will be undertaken within the existing building, with roller shutter doors closed when not in use. Daily site inspections check for odours and olfactory monitoring undertaken throughout working day by trained site staff. General housekeeping, such as sweeping of surfaces and machinery being cleared regularly of wastes build up. 	Unlikely – contaminated soils with asbestos unlikely to be source of odour - asbestos and the soils matrix will be not be inherently odorous.	Nuisance to human receptors.	Low – if control measures implemented

What do you do that can harm and what could be harmed		Managing the risk	Assessing the risk			
Hazard	Receptor	Pathway	Risk management	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 can the hazard 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
	Whimpey Offices 500m SE		 Existing building will shelter wastes from rain and wind, hence preventing odours being created and/or spreading outside the site boundary. 			

Table 3 – Noise & Vibration Risk Assessment

What do you do that can harm and what could be harmed		Managing the risk	Assessing the risk			
Hazard	Receptor	Pathway	Risk management	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 can the hazard 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
Noise and vibration from soil handling and treatment and delivery vehicles.	Workers and visitors to the adjacent Bletchley Landfill Site. Users of playing field & Newton Leys Pavilion 50m S Residential area of Water Eaton 270m E and Newton Leys 350m S Leon School and Sports Site 270m E Businesses within units of Bletchley Business Campus off	Through air and ground.	 Treatment of soils will involve screening and hand-picking of bound asbestos. Preventative measures include: Plant and machinery will be enclosed within building minimising noise and vibration emissions to outside. Fully trained and competent plant operators to operate machinery. During periods of downtime, all plant will be switched off to minimise noise emissions. Un-necessary revving of engines will be avoided and an Anti-Idling Policy will be in place. Maintenance of mobile plant/equipment in line with manufactures specifications to ensure screening equipment produces minimal noise. Delivery vehicles will stick to site speed limits along haul roads to minimise noise. 	Unlikely – all activities undertaken within the building which will reduce noise impact on nearby receptors. Deliveries of waste to site unlikely to generate noise greater than that already experienced at the site (and adjacent landfill site).	Noise may cause annoyance to people nearby or passing the site on roads and footpaths.	Low – if control measures are implemented

What do you do that can harm and what could be harmed		Managing the risk	Assessing the risk			
Hazard	Receptor	Pathway	Risk management	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 can the hazard 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
	NE and Taylor Whimpey Offices 500m SE. Users of public and domestic roads and footpaths nearby. Wildlife in nearby habitats.		 Daily site inspections include routine checks to ensure noise and vibration emissions from site operations are not overly excessive. Site will operate within the landfill site's operating times and not during unsociable hours. Noise levels will be monitored by staff and any noise complaints received taken into consideration when reviewing levels. 			

Table 4 – Fugitive Emissions Risk Assessment

What do you do that can harm and what could be harmed			Managing the risk	Assessing the risk		
Hazard	Receptor	Pathway	Risk management	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 can the hazard 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			
Dust & asbestos fibres from contaminated soil treatment – 3-way screen and asbestos picking station . Dust from storage of hazardous soils	Workers and visitors to the adjacent Bletchley Landfill Site. Users of playing field & Newton Leys Pavilion 50m S Residential area of Water Eaton 270m E and Newton Leys 350m S Leon School and Sports Site 270m E Businesses within units of Bletchley	By air.	 Whilst strict waste acceptance procedures and historical air monitoring at other FCC-operated asbestos soils treatment sites in open air have shown there to be low to negligible risk of dust or asbestos fibres released during operations, a set of mitigation measures is included for reassurance. Preventative measures include: Provision on site of a water bowser/dust cannon and adequate year-round water supply and dust suppression by regular spraying in dry conditions. Continuous dust suppression misting system with added asbestos surfactant (where required). Asbestos monitoring will be carried out against background reference levels using a detection limit of <0.0005f/ml determined with on-site monitoring as a pre-commencement condition. 	Unlikely - Given the evidence prepared by Dr Simon Cole of Hydrock for the recent Permit Appeals for similar activities at Daneshill & Maw Green (Appeal Reference APP/EPR/636 & APP/EPR/651 (Daneshill) APP/EPR/652 (Maw Green)	Nuisance - dust on cars, clothing etc. Human health hazard from asbestos fibres. Smothering of fauna and flora by dust.	Low – if control measures implemented.

What do you do that can harm and what could be harmed		Managing the risk	Assessing the risk				
Hazard	Receptor	Pathway	Risk management	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 can the hazard 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	
	Business Campus off Barton Road		 Use of clean water for dust suppression, to avoid re-circulating fine material. 	there is a comprehensive			
	330m.NE and Taylor Whimpey Offices 500m SE. Users of public and domestic roads and	330m.NE and Taylor Whimpey Offices		 High standards of house-keeping to minimise track-out and windblown dust. 	assessment with respect to		
			 A preventative maintenance programme, including readily available spares, to ensure the efficient operation of plant and equipment. Minimisation of drop heights during tipping: 	the potential fugitive emission of airborne			
	footpaths nearby. Wildlife and plants in nearby habitats and designated sites (Main Line LWS and Blue Lagoon & Woodland).		 Minimisation of drop heights during tipping; Clear delineation of stockpiles to deter vehicles from running over edges. Effective staff training in respect of the causes and prevention of dust and asbestos fibre release. Existing building proposed to be used due to already existing on-site and will provide shelter from the weather, not specifically to control dust/asbestos emissions, however building with roller shutter doors (closed when not in use) will provide a measure of dust mitigation on-site. Specific measures in relation to activities within the treatment facility include: 	airborne asbestos fibres and associated health risk relating to the proposed treatment of asbestos contaminated soils that is also applicable to the operations proposed at			

What do you do that can harm and what could be harmed		Managing the risk	Assessing the risk			
Hazard	Receptor	Pathway	Risk management	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 can the hazard 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
			 Pre-acceptance testing of soils will be undertaken to quantify that asbestos fibres are lower than 0.1% for Chrysotile and 0.01% for any other forms of asbestos detected in soil. If there are exceedances of these limits then that soil will be rejected from site. 			
			 Daily dust monitoring carried out to assess levels of emissions from site activities. 			
			 Hand-picking operations are carried out in a fully enclosed picking station to minimise potential for asbestos fibre release to air. 			
			 Misting equipment to be employed if required during summer months. 			
			 Hand-picking is of hard bound asbestos, unlikely to release fugitive asbestos fibres. 			
			 Staff working in hand-picking station will undertake suitable training and wear correct personal protective clothing. 			
			 Decontamination of workers will be undertaken in decontamination unit and used PPE bagged and disposed of in asbestos 			

What do you do t	hat can harm and what o	could be harmed	Managing the risk	Assessing the risk		
Hazard	Receptor	Pathway	Risk management	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 can the hazard 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
			skip, to prevent fugitive asbestos fibres leaving site			
			A Dust & Emissions Management Plan (DEMP) for the Site is in place as document ref. 6089- CAU-XX-XX-RP-V-0304.			
			To Water			
Contaminated run-off into surface water or groundwater.	Groundwater below site (although below site is a Secondary Undifferentiated Aquifer in superficial deposits and no aquifer designation for bedrock or SPZs near site suggests groundwater is of low vulnerability). Nearby surface water	Surface run- off/overland flow and infiltration down into ground.	All treatment and storage of hazardous asbestos- impacted soils will be undertaken within the building on the impermeable concrete surfacing. As such the operation will be worked dry, under cover from rain by the building and the existing external surface water drainage system will ensure no run-off enters the building. The impermeable site surfacing will ensure any potential spillages of hazardous substances or liquids are contained and prevented from infiltrating the ground below. The site surface will be subject to daily site inspections to ensure integrity is maintained and any potholes or cracks are fixed as soon as practicable.	Unlikely - the areas of the site used for soil activities are located on impermeable concrete surfacing, with no direct link to surface water receptors.	Detriment to the quality of surface water could affect fish and other wildlife within the watercourse. May adversely affect groundwater quality.	Low – if control measures are implemented.
	receptors – Blue					

What do you do that can harm and what could be harmed		Managing the risk	Assessing the risk			
Hazard	Receptor	Pathway	Risk management	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 can the hazard 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
	Lagoon 30m N, a pond 65m SE and		There is no direct link to surface water receptors from the waste operations within the building.			
	Jubilee Brook 175m E.		No hazardous wastes will be stored outside on the external storage areas and unloading of soils will be supervised by suitably trained staff who will be aware of storage requirements inside the building. Control measures for potential spills or leaks of hazardous substances from the static and mobile			
			plant and equipment to be used at the site is covered in Table 7.			
			Pests			
Rodents, flies, other pests and associated diseases	Workers and visitors to the adjacent Bletchley Landfill Site. Users of playing field & Newton Leys Pavilion 50m S	Over ground, via the air or via watercourses.	 Unlikely due to nature of asbestos-impacted soil wastes to be accepted. Not likely to attract pests such as rats, flies and other pests. Daily site inspections will monitor for the presence of rats/pests on site. Waste acceptance procedures will ensure that non-conforming wastes, including those which contain biodegradable/food fractions are rejected. 	Very unlikely - waste types to be accepted at site unlikely to result in rats/pests being a problem.	General nuisance and health risk from rats being vectors for human pathogens (e.g. Weil's disease).	Very Low – if control measures are implemented.

What do you do that can harm and what could be harmed		Managing the risk	Assessing the risk			
Hazard	Receptor	Pathway	Risk management	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 can the hazard 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
	Residential area of Water Eaton 270m E		 Soils unlikely to attract rodents if strict waste acceptance procedures adhered to. 			
	and Newton Leys 350m S		 In general, good housekeeping with regular sweeping and clearing of waste areas is encouraged. 			
	Leon School and Sports Site 270m E		Actions in the event of rodents/pests being detected at the site:The incident must be reported to the site			
	Businesses within units of Bletchley Business Campus off		 manager; A record must be made of the incident and actions taken; 			
	Barton Road 330m.NE and Taylor		 Waste acceptance and storage procedures should be reviewed; 			
Whimpey Offices 500m SE.	500m SE.		 Specialist pest control contractor will visit site regularly and on an ad hoc basis and if 			
	Users of public and domestic roads and footpaths nearby.		an infestation is detected, will be employed to remedy situation.			

What do you do that can harm and what could be harmed		Managing the risk	Assessing the risk			
Hazard	Receptor	Pathway	Risk management	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 can the hazard 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
			Mud/Litter			
Litter from off- loading and processing of loads including possibility of some light wastes.	Workers and visitors to the adjacent Bletchley Landfill Site. Users of playing field & Newton Leys Pavilion 50m S Residential area of Water Eaton 270m E and Newton Leys 350m S Leon School and Sports Site 270m E Businesses within units of Bletchley Business Campus off Barton Road	Air and over ground.	 Acceptance of asbestos-impacted soils waste types containing unlikely to contain litter. Measures taken to prevent litter leaving the site: Waste acceptance procedures to ensure the acceptance of only permitted waste types, inherently unlikely to contain litter. Treatment and storage of wastes will be undertaken within the existing building on- site, which although not selected to act as a control measure for containing litter, will nonetheless provide protection and shelter from windblow across stockpiles and roller shutter doors will be kept closed when not in use. Actions in the event of litter being detected leaving the site: - Litter picking will be carried out. Priority is given to clearing any litter outside the permit boundary furthest away and working inwards. 	Very unlikely - litter may be identified from time to time but likely to be in relatively small quantities and non-conforming loads will be rejected from site.	Visual nuisance to nearby receptors and pollution of local habitats.	Very Low – if control measures are implemented.

What do you do that can harm and what could be harmed			Managing the risk	Assessing the risk		
Hazard	Receptor	Pathway	Risk management	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 can the hazard 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
	330m.NE and Taylor Whimpey Offices 500m SE.		The incident must be reported to the site manager.A record must be made of the incident and			
	Users of public and domestic roads and footpaths nearby.		actions taken. Waste acceptance, storage and treatment procedures should be reviewed, and additional control imposed as deemed necessary by the site			
	Wildlife and plants in nearby habitats and designated sites (Main Line LWS and Blue Lagoon & Woodland).		manager.			
Mud and debris being tracked out of site onto surrounding public roads.	Users of access road to site and adjoining public roads e.g. workers and visitors who drive to the adjacent Bletchley Landfill Site.	Tracking on vehicle tyres entering/leaving the site.	 Preventative measures taken to prevent mud leaving the site: The site is constructed with a smooth concrete site surfacing which prevents mud from the ground below from being generated. Roads and site areas will be regularly swept of soils during normal site operations. 	Unlikely – good housekeeping and vigilant site staff will ensure mud or debris is not tracked out of the site.	Visual nuisance to locals and skid risk to drivers using roads.	Low – if control measures are implemented.

What do you do that can harm and what could be harmed		Managing the risk	Assessing the risk			
Hazard	Receptor	Pathway	Risk management	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 can the hazard 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
	Local road users who live and work in adjacent residential area of Water Eaton 270m E and Newton Leys 350m S.		 Drivers will be encouraged to ensure their vehicle tyres are clean before leaving site and that any loose material in their waste load is covered. Daily site inspections will monitor for mud or debris being tracked around the building and out from the site. In general, good housekeeping with regular sweeping and clearing of debris is encouraged, including ensuring stockpiles are kept tidy and vehicles and plant do not run over the edges. Actions in the event of mud and debris is being tracked onto roads outside the site: - Affected road areas will be cleaned by road sweeper. The incident must be reported to the site manager. A record must be made of the incident and actions taken. 			

Table 5 – Visible Plumes Risk Assessment

What do you do that can harm and what could be harmed			Managing the risk	Assessing the risk		
Hazard	Receptor	Pathway	Risk management	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 can the hazard 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
Potential visible plumes.	Nearby receptors.	Air.	N/A – no visible plumes will be generated by the proposed operations.	N/A	N/A	N/A

What do you do that can harm and what could be harmed		nd what could be	Managing the risk	Assessing the risk		
Hazard	Receptor	Pathway	Risk management	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 can the hazard 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
Release of Bio- aerosols.	Local human population.	Via air.	Not applicable – bioaerosols not likely to be generated by the site activities. The asbestos- impacted soils to be accepted at the site are not a source of bioaerosols. Any biodegradable or putrescible wastes will not to be accepted at the site. Not considered further.	N/A	N/A	N/A

Table 6 - Release of Bioaerosols Risk Assessment

Table 7 – Accidents Risk Assessment

What do you	do that can harm and v harmed	vhat could be	Managing the risk	Assessing the risk		
Hazard	Receptor	Pathway	Risk management	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 can the hazard 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
Spillage or leak of fuel, various liquid products used in equipment or vehicle maintenance, or other hazardous liquids.	Groundwater below site (although below site is a Secondary Undifferentiated Aquifer in superficial deposits and no aquifer designation for bedrock or SPZs near site suggests groundwater is of low vulnerability). Nearby surface water receptors – Blue Lagoon 30m N, a pond 65m SE and Jubilee Brook 175m E.	Through site surfacing and ground.	 Preventative measures: The soil treatment and storage activities will take place on impermeable concrete site surfacing. All fuels and tanks will be appropriately stored and bunded 110% of their capacity and be compliant with CIRIA 'Containment systems for the prevention of pollution: Secondary, Tertiary and other measures for industrial and commercial premises' (C736, 2014). Regular inspections will be carried out that check for integrity of site surfacing, integrity of site surfacing, integrity of mobile plant and correct storage of any hazardous liquids e.g. fuel for mobile plant. All staff involved in soils handling are inducted in the emergency procedures regarding the handling of spills or leaks. 	Unlikely - impermeable concrete site surfacing will prevent migration of spills or leakages to underlying ground.	Contamination of local water course or underlying ground or groundwater.	Low – if control measures are implemented.

What do you do that can harm and what could be harmed		Managing the risk	Assessing the risk			
Hazard	Receptor	Pathway	Risk management	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 can the hazard 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
			 Actions in the event of leaks or spillages: Incidents to be managed in accordance with emergency procedures regarding the handling of spills. Spillages will be contained using appropriate spill kits or absorbent materials (e.g. soils). Where the spill is near any drains, drains should be protected. For larger spills of hazardous materials, any affected interceptors should be isolated and if necessary the interceptor cleaned out. Depending on the severity of the spill, the Environment Agency will be contacted. The emergency procedure includes incident reporting and, as part of the environmental management system, incidents will be reviewed by management on a regular basis. 			

What do you do that can harm and what could be harmed		vhat could be	Managing the risk	Assessing the risk		
Hazard	Receptor	Pathway	Risk management	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 can the hazard 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 in processing areas within building.	Groundwater below site (although below site is a Secondary Undifferentiated Aquifer in superficial deposits and no aquifer designation for bedrock or SPZs near site suggests groundwater is of low vulnerability). Nearby surface water receptors – Blue Lagoon 30m N, a pond 65m SE and Jubilee Brook 175m E. Atmosphere. Workers and visitors to the adjacent	Smoke and vapours by Air. Firewater over and into Ground and into Surface Water.	 Fires could occur as a result of arson in the building, from sources of ignition/plant and equipment, or from electrical faults on site. Asbestos-contaminated waste soils not combustible therefore unlikely to burn and could be used in the event of fire to smother a fire, if deemed safe, by trained mobile plant operators. Preventative measures: No smoking policy. Emergency vehicles will be able to gain access to the processing buildings at all times whilst the site is operational via the roller shutter doors. All staff involved in soil handling will be inducted in the emergency procedures including the fire action plan and a regular fire drill. Daily checks and emergency procedures in place to prevent fire risk. 	Unlikely – wastes to be accepted not combustible. Procedures in place to ensure	Smoke, local nuisance, risk of fire spreading to other areas or properties.	Low – provided control measures are implemented.

What do you do that can harm and what could be harmed		Managing the risk	Assessing the risk			
Hazard	Receptor	Pathway	Risk management	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 can the hazard 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
	Bletchley Landfill Site. Users of playing field & Newton Leys Pavilion 50m S		 Site staff trained in fire risk and how to deal with an incident on site. Any visitors to the site will be inducted and be made aware of the fire risks. 			
	Residential area of Water Eaton 270m E and Newton Leys 350m S Leon School and Sports Site 270m E Businesses within units of Bletchley Business Campus off Barton Road 330m.NE and Taylor Whimpey Offices 500m SE.		 Actions in the event of fire: Where it is safe to do so, site staff will use on-site fire-fighting equipment to extinguish fires. Where a fire may have been caused by electricity or is close to electrical equipment, electricity to that area should be switched off and isolated by trained personnel. Clear directions will be given to the fire service and members of staff will provide assistance where required. The emergency procedure includes incident reporting. As part of the environmental management system, incidents will be reviewed by 			

What do you do that can harm and what could be harmed		Managing the risk	Assessing the risk			
Hazard	Receptor	Pathway	Risk management	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 can the hazard 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
	domestic roads and footpaths nearby.		management on a regular basis to identify whether lessons can be learnt, and procedures improved.			
Flooding	Groundwater below site (although below site is a Secondary Undifferentiated Aquifer in superficial deposits and no aquifer designation for bedrock or SPZs near site suggests groundwater is of low vulnerability). Nearby surface water receptors – Blue Lagoon 30m N, a pond 65m SE and Jubilee Brook 175m E.	Over land by flood water. Drainage systems.	The site is within a Flood Zone 1 according to the GOV.UK Flood Risk Maps website, which indicates that the site has a very low probability of flooding (less than 0.1% chance of flooding each year) from rivers and the sea. Processing and storage area protected by building, with extreme rainfall directed to external surface water drains. Asbestos-impacted soils, although hazardous due to the asbestos, would not have the potential to pollute surface water if flooding was to occur, except with potential suspended solids. Flood water would be directed to external drains. Actions in the event of flooding: In the event of flood warnings for the area, the site manager or technically competent manager should consider	Unlikely	Contamination/silting of surface waters or surrounding areas with soil materials could, depending on the properties of the soils affect water quality or be unsightly.	Low – provided control measures are implemented.

What do you do that can harm and what could be harmed			Managing the risk	Assessing the risk		
Hazard	Receptor	Pathway	Risk management	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 can the hazard 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
			 the possibilities of moving any materials with the potential to pollute standing water i.e. fuels/oils in storage. Where flooding could reach areas where electrical equipment is used, electricity to that area should be switched off and isolated. After flood waters have receded, the areas outside the site should be inspected and any waste or other materials which have escaped the boundary should be picked up. 			

4.0 CONCLUSION

4.1 Risk Assessment Tables – Overall Risk

4.1.1 The risk assessments above enable identification of appropriate mitigation measures to control the amenity and accident risks from the proposed activities. All identified risk mitigation measures will be incorporated within the Environmental Management System (EMS) for the site.

4.2 Report Conclusions

4.2.1 This Environmental Risk Assessment report indicates that provided the identified risk mitigation measures (as identified above in Tables 2 to 7 above) are implemented, the risk of nuisance or pollution from odour, noise and vibration, fugitive emissions, bioaerosols, visible plumes and accidents reaching sensitive receptors is low.

4.3 Further Information

4.3.1 A review of dust and asbestos fibre emission risks from site are also covered in the Dust & Emissions Management Plan document ref. 6089-CAU-XX-XX-RP-V-0304, included with this application.

5.0 REFERENCES

1) Environment Agency guidance 'Risk Assessments for your environmental permit' (last updated 21st November 2023), found at: <u>https://www.gov.uk/guidance/risk-assessments-for-your-environmental-permit</u>.

DRAWINGS

6089-CAU-XX-XX-DR-V-1800 Sensitive Receptors Plan



Caulmert engineering environmental planning

6089-CAU-XX-XX-DR-V-1800

DESIGNED BY	DRAWN BY	REVIEWED BY	AUTHORISED BY	
EJD	EJD	SH	SH	
DATE	SCALE @ A3	JOB REF:	REVISION	
05.03.2024	1:10000	6089	P01	
DRAWING NUMBER				

SENSITIVE RECEPTOR PLAN

TITLE:

BLETCHLEY WASTE PROCESSING FACILITY



P01	ISSUED FOR INFORMATION	EJD	SH	SH	07.03.24
REV	MODIFICATIONS BY RE		AP	DATE	
PURPOSE OF ISSUE FOR INFORMATION				STATUS	52

LOCAL NATURE RESERVE



MEDICAL FACILITY AGRICULTURAL MAJOR ROAD MINOR ROAD RAIL LOCAL WILDLIFE SITES PROTECTED SPECIES, NON FISH PROTECTED HABITATS SCREENED FOR ENVIRONMENTAL PERMITS

WOODLAND / SCRUBLAND RECREATIONAL EDUCATIONAL FACILITY COMMERCIAL / INDUSTRIAL

RESIDENTIAL

SURFACE WATER

PERMIT BOUNDARY

LEGEND

1000m OFFSET

APPENDIX 1

Environment Agency Habitats Screening Report

Nature and Heritage Conservation

Screening Report: Bespoke Waste

Reference	EPR/FB3530RC/P001
NGR	SP 86858 32153
Buffer (m)	90
Date report produced	29/02/2024
Number of maps enclosed	3

This nature and heritage conservation report

The nature and heritage conservation sites, protected species and habitats, and other features identified in the table below **must be considered in your application**.

In the further information column, there are links which give more information about the site or feature type and indicate where you are able to self-serve to get the most accurate site boundaries or feature locations.

Most designated site boundaries are available on <u>Magic map</u>. Using Magic map allows you to zoom in and see the site boundary or feature location in detail, Magic map also allows you to measure the distance from these sites and features to your proposed boundary. <u>Help videos</u> are available on Magic map to guide you through.

Where information is not publicly available, or is only available to those with GIS access, we have provided a map at the end of this report.

Sites and Features w screening distance	ithin	Screening distance (m)	Further Information		
Local Nature Reserve (LN	R)	200	Natural England and Magic map		
Blue Lagoon					
Local Wildlife Sites (LWS) below)	(see map	200	Appropriate Local Record Centre (LRC)		
Main Line					
Blue Lagoon					
Reference: Bespoke waste screen	Version: 6.0	Security	Marking: OFFICIAL Page 1 of 3		

Protected Species within screening distance

Code 2

Screening Further Information distance (m) up to 500m Natural England

Appropriate Local Record Centre (LRC)

Environment Agency. Dial 03708 506 506 for your local Fisheries and **Biodiversity team**

Protected Habitats within screening distance

Screening Further Information distance (m) Natural England

Deciduous woodland

up to 50m

Unfortunately, we cannot provide you with the details of all protected species. This is because we either have not been given permission by the owner of the species data, or they have asked us not to identify the species as they are vulnerable. In these instances, you must contact the relevant organisation listed above. A small administration charge may be incurred for this service.

Where protected species are present, a licence may be required from Natural England to handle the species or undertake the proposed works.

The relevant Local Records Centre must be contacted for information on the features within local wildlife sites. A small administration charge may also be incurred for this service.

The following nature and heritage conservation sites, protected species and habitats, and other features have been checked for, where they are relevant for the permit type requested, but have not been found within screening distance of your site unless included in the list above.

Special Areas of Conservation (cSAC or SAC), Special Protection Area (pSPA or SPA), Marine Conservation Zone (MCZ), Ramsar, Sites of Special Scientific Interest (SSSI), National Nature Reserve (NNR), Local Nature Reserve (LNR), Local Wildlife Sites (LWS), Ancient Woodland, relevant species and habitats.

Version: 6.0

Please note we have screened this application for features for which we have information. It is however your responsibility to comply with all environmental and planning legislation, this information does not imply that no other checks or permissions will be required.

The nature and heritage screening we have conducted as part of this report is subject to change as it is based on data we hold at the time it is generated. We cannot guarantee there will be no changes to our screening data between the date of this report and the submission of the permit application, which could result in the return of an application or requesting further information



Protected Species

Legend

0





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