



Environmental Risk Assessment

RB Groundworks and Fencing Ltd

**Unit 6
Ennerdale Road
Blyth
Northumberland
NE24 4RT**

EPR/KB3209KR

Olive Compliance Ltd

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1.0 Introduction

RB Groundworks and Fencing Ltd (RBG) have instructed Olive Compliance Limited (OCL) to prepare an application for a Bespoke Environmental Permit Variation Application for their site located at Unit 6 , Ennerdale Road , Blyth , Northumberland , NE24 4RT.

This ERA has been undertaken in accordance with the Environment Agency (EA) *Risk assessments for your environmental permit*¹ (2016) and is a simple assessment of the risks to the environment and human health from accidents, noise and fugitive emissions that may be associated with the proposed operations at the site.

The aim of the assessment is to identify any significant risks and demonstrate that the risk of pollution or harm will be acceptable by taking the appropriate measures to manage these risks.

The above guidance requires all receptors that are near the site and could reasonably be affected by the proposed activities to be identified and considered as part of the ERA. Therefore:

- a 2km radius has been adopted in reviewing potentially sensitive receptors of ecological importance; and
- a radius of 1km from the proposed permit boundary has been adopted for all other potentially sensitive receptors (for example, residential, cultural heritage, commercial, industrial, agricultural and surface water receptors).

2.0 Site Setting and Receptors

2.1 Site Setting

The site is located at Unit 6 , Ennerdale Road , Blyth , Northumberland , NE24 4RT.

RBG are a well-established family business recycling of inert, non-hazardous wastes arising from industrial, commercial and household sources.

Wastes are inspected, sorted and segregated into separate fractions then forwarded on for further recovery.

Recovery of waste such as soils and stones are conducted under a compliant WRAP protocol.

Waste operations proposed to be authorised by a bespoke environmental permit.

The site will accept up to 75,000 tonnes per annum.

¹ <https://www.gov.uk/guidance/risk-assessments-for-your-environmental-permit>

The site is principally bounded by industrial/commercial premises, located in a large established industrial estate. The northern boundary of the site leads to coastal rural features (River Blyth).

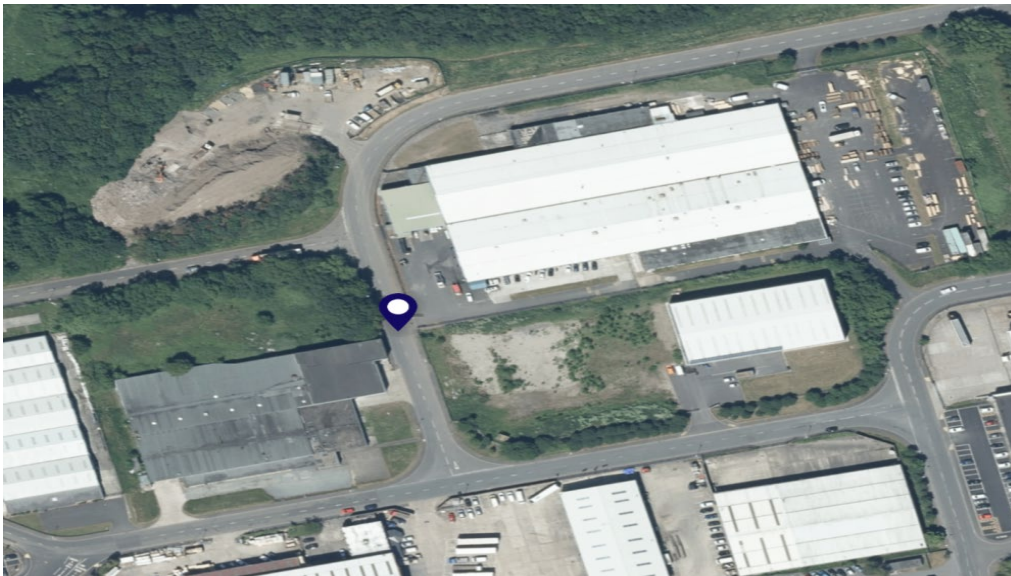
The site location and environmental site setting is shown in Image 1.

A summary of the immediate environmental site setting is provided in Table 1 below.

Table 1
Surrounding Land Uses

Boundary	Description
North	Commercial/Industrial
South	Commercial/Industrial
East	Commercial/Industrial
West	Commercial/Industrial

Image 1 – Permitted Area



Other Waste Management Facilities

There are a number of regulated permitted facilities and companies operating under waste exemptions operating on the Industrial Estate.

Permitted Sites

Permitted sites are located within 0.1km of the proposed site. These are listed below in Table 3.

Table 3 – Permitted Sites with 1km

Name	Distance (km)	Address
S A WASTE & GROUNDWORKS LIMITED	0.1	10, Ennerdale Road, Blyth Riverside Bus Park, Blyth, Northumberland, NE24 4RT
James McIver	0.8	The Smallholding, Coniston Road, Kitty Brewster Ind Est, Blyth, Northumberland, NE24 4RF
SUEZ RECYCLING AND RECOVERY UK LTD	0.9	Land / Premises At, Hathery Lane, Bebside, Blyth, Northumberland, NE24 4HN

Exemptions

There are currently 12 waste exemption operations registered within 1k of the site are listed below in Table 4. After a review of the registered exemptions there is no posed risk to the activities proposed on site.

Table 4 – Registered exemptions

Name	Registration Type	Distance (km)
Magre Enterprise	T4	0.1
GO GREEN RECYCLING NE LIMITED	T4	0.2
Northumberland County Council	S2	0.2
rb groundworks and fencing ltd	U1	0.5
Northumberland County Council	S2	0.5
NATHAN'S WASTESAVERS LTD	S2	0.6

Name	Registration Type	Distance (km)
Northumbrian Water Limited	T21	0.7
FJS BLAGDON LIMITED	U1	0.7
Sleekburn Farms	S2 U10 D7 U1 U13	0.7
D d Armstrong Ltd	U1	0.8
MORGAN SINDALL CONSTRUCTION & INFRASTRUCTURE LTD	U1	0.8
Eden Pharmacy & Healthcare Ltd	T28	0.9

Waste Carriers

The company is a registered waste carrier. Registration number CBDU361959 refers and expires in April 2023.

Sensitive receptors

None of the below receptors have been identified within 1km of the proposed permit boundary:

- National Nature Reserves;
- World Heritage Sites;
- Area of Outstanding Natural Beauty;
- Woodland Trust Sites; and
- National Forest.

There are no registered parks or gardens are located within 1km of the site.

European/International Sites

Searches on the Multi Agency Geographical Information for the Countryside (MAGIC)² website confirm there are Sites of Special Scientific Interest (SSSI), a special area of conservation (SAC), Marine Conservation Zone within 1km of the site.

A local nature reserve is located within 200m of the site.

These are shown in the screening maps in appendix 1 of this report.

Major Roads and Transport Links

The A1 runs approximately 350m west of the site.

Rail links within 2m of the site boundary.

Water courses

The River Blyth is located approximately 170 meters east of the site.

Flood Risk Zone

Using the Environment Agency Long Term Flood Risk Information service the site is identified as having a 'very low risk' from surface water flooding, reservoirs, rivers and seas.

2.1.1 Geology, Hydrogeology & Hydrology

Geology

Superficial deposits

Till, Devensian - Diamicton. Sedimentary superficial deposit formed between 116 and 11.8 thousand years ago during the Quaternary period.

The nearest Groundwater Source Protection Zone is 3km to the south of the site.

There are no authorised water discharges within 1km of the site.

Bedrock geology

Pennine Middle Coal Measures Formation - Mudstone, siltstone and sandstone. Sedimentary bedrock formed between 318 and 309.5 million years ago during the Carboniferous period.

² www.magic.gov.uk accessed April 2023

2.2 Receptors

Table 5 below identifies receptors that are potentially sensitive and could reasonably be affected by the site within 1km of the site boundary.

Table 5 – Sensitive Receptors

Receptor	Distance	Receptor Assessment
The River Blyth	170m North	<p>Due to the proximity of site and waste types, there is a low risk of impact from site activities.</p> <p>Surface water drainage systems are in place on site to retain all water on site , no runoff will leave site and enter the NWL surface water system.</p>
A189 – Transport Link	350m West	<p>Due to the proximity of site, there is a low risk of impact from site activities.</p> <p>All wastes are accepted treated and stored in site in accordance with site management systems, regulated stockpiles with secure fencing and bay enclosure to prevent loss of materials through handling and during treatment.</p>
Human Receptor Residential properties south of Maple Crescent	170m South	<p>Due to the proximity of site, there is a risk of impact from site activities.</p> <p>Dust, Litter,Noise and Fire Controls in place to prevent impact to local residents.</p>
ASDA – Retail/Leisure Facility	533m South West	<p>Due to the proximity of site, there is a risk of impact from site activities.</p> <p>Dust, Litter,Noise and Fire Controls in place to prevent impact to the business sand public use areas</p>
Horton Grange Primary School	387m South	<p>Due to the proximity of site, there is a risk of impact from site activities.</p> <p>Dust, Litter,Noise and Fire Controls in place to prevent impact to these receptors</p>
The Dales School	271m South	<p>Due to the proximity of site, there is a risk of impact from site activities.</p>

		Dust, Litter,Noise and Fire Controls in place to prevent impact to the neighbouring businesses.
Sensitive Receptors SSSI SPA		The location of the woodland and prevailing wind direction means there is a low risk of ash settlement and any potential wildlife habitats. Due to its location, there is minimal risk of dust settlement and wildlife impact in the event of an emissions release. Due to the proximity of site, there is a low risk of impact from site activities.
Commercial Business – Cowpen Industrial Estate	0.1km	The site is located in Cowpen Industrial Estate that have varying industrial and commercial activities, with 3 Permitted Sites and 12 registered waste exemption activities within 1km of the site. Low risk posed to these businesses from site activities. This businesses may also cause an environmental impact to sensitive receptors.
Chasedale Care Home	550m South	Due to the proximity of site, there is a risk of impact from site activities. Dust, Litter,Noise and Fire Controls in place to prevent impact to these receptors

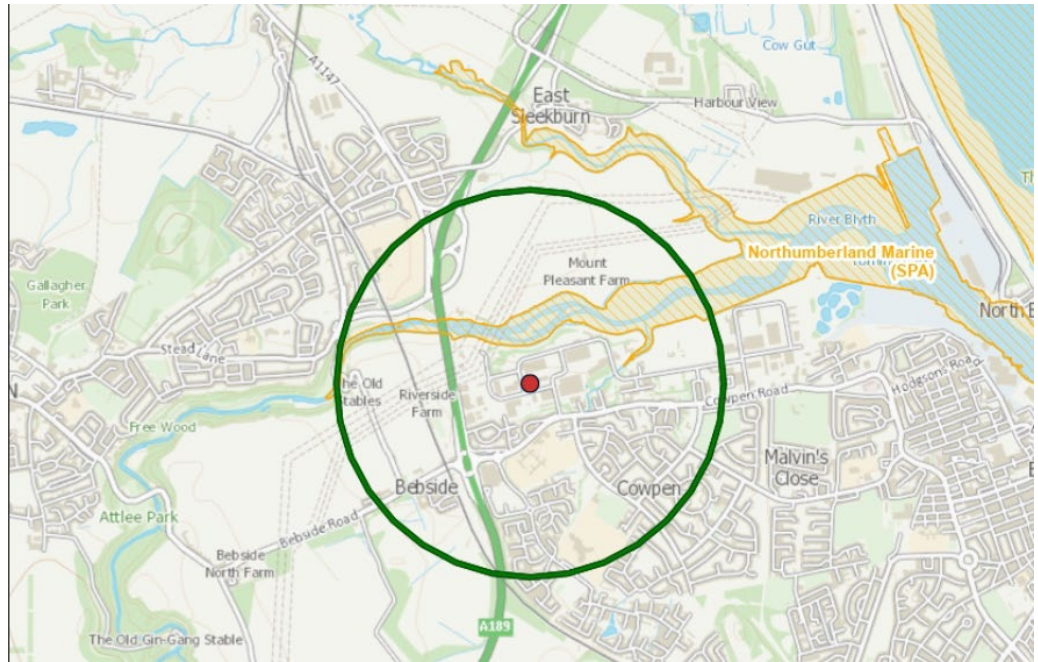
It is considered that the identified receptors will not be affected by the activities proposed at the site due to either distance from site or through onsite controls.

A habitats/ecology assessment has been conducted in relation to the site, sensitive receptors and activities. This is included in Appendices 3 of this report with the SPA Citation.

SPA Location to site

Legend

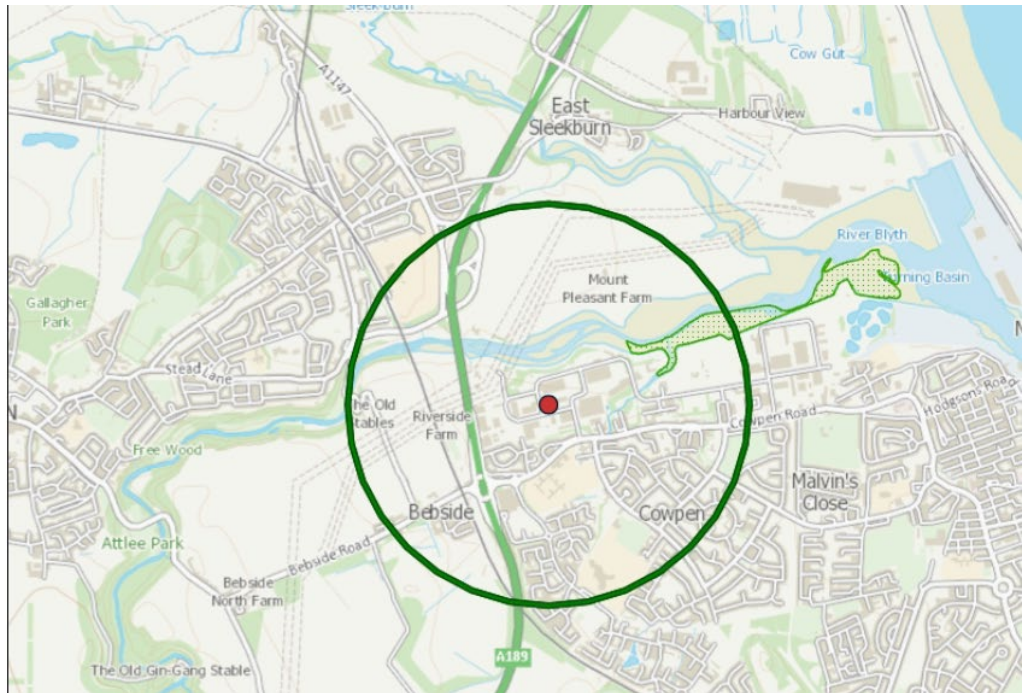
SPA (England)



SSSI Location to site

Legend

SSSI (England)



2.3 Overview and Approach

This section outlines the procedure that has been followed in the undertaking of the ERA for the site. The results are presented, in accordance with the EA Guidance, in the tables presented in Section 3.2.

2.3.1 Identification of Hazards

The first step of an ERA is to consider and identify the risks posed to the environment by the activities proposed for a site.

The EA Guidance states that an operator must:

“...identify whether any of the following risks could occur and what the environmental impact could be:

- *any discharge, for example sewage or trade effluent to surface or groundwater*
- *accidents*
- *odour (not for standalone water discharge and groundwater activities)*
- *noise and vibration (not for standalone water discharge and groundwater activities)*
- *uncontrolled or unintended ('fugitive') emissions, for which risks include dust, litter, pests and pollutants that shouldn't be in the discharge*
- *visible emissions, eg smoke or visible plumes.”*

2.3.2 Identification of Receptors

Section 2 of this document describes the site setting, and the land uses in the vicinity of the site.

This information has been used in order to focus on the main receptors that could be potentially at risk from the activities of the site.

Waste activities on site are deemed as low risk as the site is surrounded by commercial activities, conducting various commercial and industrial operations. The site will operate under a robust accredited management system, a working plan and an Environmental Agency approved Dust and Emissions Management Plan.

Site activities are monitored daily through checks, with monthly audits to ensure controls are in place and procedures are adhered to.

In accordance with the EA Guidance, Drawing 004 presents a map showing the location of the site and the human receptors considered within the ERA.

2.3.3 Identification of Potential Pathways

For each of the identified hazards for operation of the site, the ERA has considered that pathways through which each hazard may impact on a sensitive receptor. Where such pathways exist, the risks of potentially significant impacts have been assessed in accordance with Sections 3.1.4 and 3.1.5 (below) and the full details are included in the tables in Section 3.2.

Where no pathway exists between an identified hazard and an identified receptor, the associated risks are not considered further within the ERA and are, thus, not included in Section 3.2.

2.3.4 Assessment of Risks

The EA Guidance states that the nature of the ERA will be influenced by the type of activity (or activities) that are proposed for a site. For installations/waste operations, the ERA is required to consider, “...one or more of the following, depending on the substances you discharge and where they’re discharged to:

- *assess the risks of your air emissions*
- *calculate the global warming impact of your air emissions*
- *assess risks to groundwater*
- *assess risk to groundwater from landfill leachate*
- *assess risks to surface water from hazardous pollutants*
- *assess risks to surface water from sanitary and other pollutants”*

For installations and waste operations, an operator is also required to decide how to treat, recycle or dispose of waste. The ERA has therefore included consideration of the environmental impact of the ultimate fate of the materials that will be processed by the proposed activities of the site.

2.3.5 Controlling Risks

The EA Guidance states:

“You’ll need to show how you’re managing any risks appropriately by controlling and monitoring your emissions and through your management system.”

Where an ERA identifies risks that are potentially significant, the ERA is required to demonstrate how the risk of pollution or harm can be mitigated by measures to manage these risks. The approach undertaken to the implementation of management/mitigation measures, for this ERA, is (in order of preference):

- Avoidance / prevention;
- Minimisation / management;
- Mitigation; and
- Offset / compensation.

The following tables present the assessment in terms of hazards posed, receptors and pathways, along with management and residual risks for the following hazards:

- Odour;
- Noise and Vibration;
- Fugitive Emissions (including dust, mud, litter and pests); and
- Accidents.

Table 3-1 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 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? – 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
Odours from the acceptance , treatment and storage of waste	<i>Site personnel and local human population</i>	Air	<ul style="list-style-type: none"> No odorous wastes will be accepted at the site. Waste not typically know to be odorous due to nature of the wood. Strict waste acceptance procedures will be adhered to, to ensure only permitted wastes are accepted on site. Stringent pre-acceptance, acceptance and rejection procedures will prevent any malodorous materials from entering site. All vehicles delivering and collecting materials from the site are covered. All waste processing operations take place within the enclosed yard/using equipment with water suppression. Odour is monitored on a daily basis during the daily site inspection. In the event that odours are detected, investigations will be undertaken to determine the cause and appropriate remedial action taken. The Site Manager will be responsible for implementing risk 	Negligible	Odour nuisance and loss of amenity.	Not significant

			<p>management measures.</p> <ul style="list-style-type: none">• The facility will not give rise to reasonable cause for annoyance. In the unlikely event of any complaints, these will be dealt with in accordance with the sites complaints procedures.			
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Table 3-2 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 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? – 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 from vehicular movements, waste acceptance and treatment (site access road and yard)	<i>Site personnel and local human population</i>	Air.	<ul style="list-style-type: none"> The site is located within a predominantly industrial setting and as such is not considered unduly sensitive in regard to noise. Wastes are tipped and treated within the site which benefits from a 4/4.4m perimeter boundary which mitigates against noise from waste activities. Low volumes of soils and stones will be tipped externally in dedicated bays. All potentially noisy plant will be acoustically enclosed and / or fitted with attenuation. Appropriate preventative maintenance will be provided for the various elements of the installation. This will ensure no deterioration of plant or equipment that would give rise to increases in noise. All equipment has been designed in accordance with best practice and to ensure that any noise does not present an issue to the employees at the site under the Control of Noise at Work Regulations, and also to ensure 	Mobile. Intermittent throughout the day. Medium.	Noise nuisance and loss of amenity.	Not significant

			<p>that noise breakout does not lead to noise nuisance at the identified sensitive receptors.</p> <ul style="list-style-type: none"> • Waste treatment operations will only be carried out during operational hours. • All equipment will be maintained and operated in accordance with manufacturer's guidance and will be maintained in good working order. • The site will be operated so as to minimise noise emissions from the site. Measures that will be taken at the site include: • the avoidance of dropping loads, containers, skips off from height; • the imposition of a speed limit for vehicles delivering waste to the site. This will reduce noise associated with high engine speeds; training of all personnel in the need to minimise site noise. • All personnel are responsible for monitoring and reporting excessive noise when carrying out their everyday roles; • regular maintenance of site surfaces to prevent the development of potholes. This will significantly reduce noise generated by vehicles, particularly empty vehicles exiting the site; • Any noise complaint received will be logged in the site diary. The yard Supervisor will investigate the complaint and will take action to identify the source of the noise and implement remedial measures where 			
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			<p>appropriate.</p> <ul style="list-style-type: none">• The measures employed at the site to minimise the emission of noise will be regularly reviewed by the Site Manager and additional measures will be employed where required.• All vehicles would be fitted with white noise reversing signals rather than the traditional 'beeper' warnings.• The facility will not give rise to reasonable cause for annoyance. In the unlikely event of any complaints, these will be dealt with in accordance with the sites complaints procedures.			
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Table 3-3 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 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? – 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 from: Vehicle movements Waste storage and treatment Dusty wastes Waste deposition Waste surfaces During Dry and Dusty Conditions	<i>Site personnel , local receptors and local human population</i>	Air	<ul style="list-style-type: none"> The site has water suppression controls to reduce the potential of any dust particles to be released to the air during acceptance, treatment and storage of waste accepted externally. There will be no acceptance or treatment of dust or powdered wastes on site. Incoming wastes are inspected and validated prior to acceptance and would be rejected if too dusty <p>Waste Tipping Preventative</p> <ul style="list-style-type: none"> During waste acceptance a dedicated tipping area is identified for the deposit and inspection of waste. <p>Waste Processing</p>	Medium	Dust nuisance Harm to human health	Not significant

			<p>Preventative – All waste stored and treated in accordance with the site DEMP</p> <p>Waste Storage</p> <p>Preventative-</p> <ul style="list-style-type: none"> • All wastes will be stored in the designated storage areas. • Wastes are checked daily to ensure they do not dry out and become dusty. • Concrete panel walls and fencing panels are used for secure storage of waste which act as containment and control of material on site externally. • All stockpiles on site are stored no higher than 4m in line with the DEMP. This control measure prevents material getting blown offsite, wind whipping and containment. <p>Waste Loading</p> <p>Site Controls</p> <ul style="list-style-type: none"> • A speed limit of 10mph is implemented for vehicles using the site. • Site staff have radios for communications to take action to address vehicles not adhering to the speed limit. • Access to cctv should the speed limit be breached can be used to take immediate 			
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			<p>action and report to management.</p> <ul style="list-style-type: none"> • Metal panelling is fitted around eastern and southern boundary to contain wastes. • Incoming and outgoing vehicles carrying loads are covered, or secured and sheeted. <p>Housekeeping</p> <ul style="list-style-type: none"> • Site access roads and operational areas will be maintained and repaired to minimise emissions of dust due to uneven and poor surfacing. These are checked on a daily basis for damage with any remedial action logged on the electronic diary and emailed to senior management. • Any temporary repairs are made good within 24 hours and arrangements are made to have permanent repairs, if required, will be completed within one week. (Any substantial repair timescales may exceed this timescale dependant on weather conditions and work required), this would be tracked and recorded in the electronic site diary in the event until complete. • Records of all repairs made are recorded in the site diary and contractor invoices/records are kept in 			
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			<p>the site office for inspection if required.</p> <ul style="list-style-type: none"> • The entire site benefits from concrete surfacing throughout. • The site and entrance/exit routes are swept using a sweeper hired in if necessary. • Manual site cleaning is carried using brushes and water to clean working areas down at the start of the day and at the end of the working day. • During the day if dust is identified by the Site Manager, and site staff action will be taken to clean site access areas and operational areas will be swept where necessary to reduce dust emissions. If required, the site will be washed down in particularly dry conditions using the water sprays, mobile IBC or fire hoses installed. • External Roads are swept and cleaned on a monthly basis. • Plant cleaning and maintenance are carried out every Monday as a routine measure. Records for each machine/plant are kept to evidence this. • Prior to leaving site vehicles on can be washed down using the site power washer if the site supervisor or driver identify dust or debris on the vehicle body or wheels. Water is 			
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			<p>directed and controlled via the site sealed drainage system.</p> <ul style="list-style-type: none"> • Detergents are not used. <p>Monitoring</p> <p>Proactive-</p> <ul style="list-style-type: none"> • Daily visual inspection around the perimeter of the site, site external site access areas and all operational areas of the site and the site boundary will be carried out by site personnel. This is recorded in the daily diary. • In very dry or windy conditions the frequency of these inspections will be increased, if required to an inspection every 2 hours to check for signs of dust emissions and any impact off site. This would also be recorded in the diary. • Daily weather conditions are checked and recorded by the Site Manager both first thing in the morning then at noon. The supervisor (and key nominated staff) continue to monitor the weather conditions should they change drastically during the working day and review and implement control methods should dust be an issue. • The site has a windsock in place for the supervisor and staff to visually monitor wind direction during the day. 			
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			<ul style="list-style-type: none"> • A key sensitive receptor is identified on the Eastern Perimeter. This receptor is checked daily and inspection/any findings recorded on the electronic diary. • Should any complaints or visual inspections indicate emissions leaving site further monitoring will be carried out. A map of the Site and its surroundings identifies the off-site locations that shall be monitored, based on the nearest receptor areas. • The Site Manager or nominated trained personnel would carry out this monitoring. • The dust impacts (i.e. deposition, airborne particulate matter) will be monitored at external 4 key locations at 5minute periods. • The dust impacts will be assessed in accordance with the following scoring scheme: <p>0 - No dust detected</p> <p>1 - Very faint, unlikely to cause annoyance</p> <p>2 - Faint dust, unlikely to cause annoyance</p> <p>3 - Distinct dust, likely to cause annoyance</p> <p>4 - Visible dust in continuous plumes,</p>			
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			<p>likely to cause annoyance</p> <p>5 - Large amounts of visible dust, likely to cause annoyance</p> <p>6 - Excessive amounts of dust and particles, highly likely to cause annoyance</p> <ul style="list-style-type: none"> • The frequency of on-site and off-site inspections may be increased: • Upon receipt of material will be potential to generate significant amounts of dust is received at the Site; and/or • During periods of prolonged windy and/or dry conditions; • Or if complaints continued to be received. • Only employees with suitable training/competency will undertake the dust monitoring. • Quantitative monitoring is not proposed during routine inspections. <p>In the event of a dust impact scoring 3 or greater arising from site activities , the full extent of the impact will be determined and notified immediately to the Yard Supervisor and the management team with action taken e.g.; increase water suppression or cease activity (processing etc)</p> <p>Oher sources of dust will also be recorded should no impact</p>			
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			<p>be identified from the site, for example Local businesses, construction works, other wastes sites, external high traffic movements.</p> <p>All findings and monitoring would be recorded on the monitoring report form within the Dust Management Plan.</p> <p>The use of site CCTV can and Site Shield can also be used to investigate dust complaints and to review site or other external activities.</p> <ul style="list-style-type: none"> • Site staff are trained to be aware of the weather conditions and the risks of impact both on and off site. They act on any visual signs of dust occurring and would implement further site controls such as further suppression, ceasing activities then inform the Site Manager. • In the event that significant visual dust is observed at the boundaries of the operational areas, action will be taken to suppress the dust in the form of extra water suppression using the water sprays or fire hoses that access all areas of the site. • Should dust be a persistent issue due to severe dry periods or high winds the Site Manager would decide whether to suspend certain 			
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			<p>activities if water suppression was not effective such as inert waste processing.</p> <p>Procedures and Recording Forms</p> <ul style="list-style-type: none"> • The management of dust emissions is detailed in Dust Management of the EMS. • The procedure for managing complaints is included in the EMS. • Individual Plant and Equipment Maintenance Forms <p>Water Supplies</p> <ul style="list-style-type: none"> • The site has as access to local external water supply for general everyday use. <p>Severe Drought Conditions</p> <ul style="list-style-type: none"> • In the event water supplies are unavailable the site would consider the cessation of waste activities with direction of senior management or divert wastes to other sites. <p>Management of procedures</p> <ul style="list-style-type: none"> • The Site Manager (and other nominated trained members of staff) will be responsible for implementing risk management controls and site recording. • The facility will not give rise to reasonable cause for annoyance. In the unlikely event of any complaints, these 			
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			will be dealt with in accordance with the sites complaints procedures.			
To Water						
Runoff from waste storage areas & site surfaces Percolation of contaminated water	Surface water: Groundwater within bedrock deposits.	Overland percolation through the ground	<ul style="list-style-type: none"> All waste will be stored on concrete surfaces. All surface water drainage from the site is retained on site with bunded walls and site entrances/exits. Plans to install a sump are in place, where surface water will fall to a silt trap then sealed sump. This will be checked monthly for silt build up with water recycled on site or removed to a suitably permitted facility if required. Strict waste acceptance procedures will ensure that only permitted waste types are accepted on site. In the event that non-conforming waste is delivered to site, it will be isolated and removed from site at the earliest opportunity. 	Low	Contamination of surface water and groundwater.	Not significant
Pests						
Birds, vermin and insects.	<i>Site personnel and local human population</i>	Via air (flies and birds) or over ground (vermin and birds).	Although permitted to accept various waste types, the facility accepts only non-hazardous wastes listed in the permit. Food waste or black bin bag waste is not accepted, these wate would	Negligible	Nuisance, loss of amenity and harm to human health.	Not significant

			<p>be rejection upon identification. This reduces the risk of pest activity on site. Waste are collected by company vehicles and are inspected by trained operative before collection and delivery to site. This further reduces the risk of the acceptance of non compliant or putrescible wastes.</p> <p>The company conducts pre- and collection discussions with customer with instructions of permitted wastes and the returns policy – <i>if prohibited items are found when the skip is emptied you are likely to be charged extra and the restricted items returned to customer.</i></p> <p>Strict waste acceptance procedures implemented.</p> <p>Robust housekeeping procedures detailed in the DEMP also reduce the risk of pest infestation and easy identification of problems or signs of pest activity.</p> <p>Surfaces used for the storage of waste are to be kept clean with robust housekeeping procedures in place.</p> <p>Staff welfare/office areas are kept clean and free of waste and exposed food.</p> <p>The site is to be monitored daily for any visible signs of rodent or insect activity, such as runways, and the findings logged in the site check sheet.</p> <p>The management of pests is detailed and supported by procedure SOP 3.14 of the EMS.</p>			
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Mud/Litter						
Litter from acceptance and storage of waste	<i>Local human population and wildlife.</i>	Airborne litter	<ul style="list-style-type: none"> • Due to the nature of the waste to be accepted on site, it is not anticipated that litter will pose a serious risk. However, the boundary of the site and its environs will be regularly visually inspected and any litter cleaned up. The site will benefit from a perimeter fence which will limit the potential for litter to escape off-site. • It will be the responsibility of the site staff to monitor the site for any signs of escaping materials either from within the site or from vehicles delivering or removing materials to and from the site. • Inspections will be carried out on a daily basis and a record maintained within the site diary. • The management of litter is detailed further in the WP. 	Low	Nuisance and loss of amenity	Not significant
Mud on roads	<i>Local human population</i>	Transferral of mud on vehicle wheels	<ul style="list-style-type: none"> • The site is fully surfaced with concrete with concrete access roads. It is therefore not expected that mud will feature as a problem on the site. The following measures will be taken to prevent the deposition or tracking of mud or debris from the site onto public areas or highways: • site surfaces will be maintained free of significant 	Low	Mud on road, road traffic accidents.	Not significant

			<p>quantities of mud and debris;</p> <ul style="list-style-type: none"> • all operational areas will be subject to monitoring by staff throughout the working day; and • all vehicles leaving operational areas will, before leaving the site, be checked to ensure that they are clear of loose waste and that any products being exported from the site are secure. • In the event that mud, debris or waste arising from the site is deposited onto public areas outside the site, the following remedial measures will be implemented: <ul style="list-style-type: none"> • the affected public areas outside the site will be cleaned; and • traffic will be isolated from sources of mud and debris within the site to prevent further tracking of mud and debris, and measures will be taken to clear any such sources as soon as practicable. 			
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Table 3-4 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 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? – 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
Unauthorised waste	<p><i>Site personnel and local human population</i></p> <p><i>Local environment</i></p>	<p>Via air (odours and dust)</p> <p>Overland (to sewer, surface water and groundwater)</p>	<ul style="list-style-type: none"> • Upon delivery waste will be subject to strict waste acceptance procedures to identify, reject and/or segregate potentially non-conforming waste. • Only waste authorised by the permit will be accepted at the site. • All wastes will be subject to inspection and checking against the declaration on the waste transfer documentation. • In the event that unauthorised waste is delivered to the site, the waste will be reloaded onto the delivery vehicle for removal from site or will be segregated and stored in a designated quarantine area prior to export from site. • The waste acceptance procedures are included in the EMS. • The Site Manager will be responsible for implementing risk management measures. 	Low	<p>Water contamination</p> <p>Odour and dust nuisance, loss of amenity</p>	Not significant

Fire	<i>Site personnel and local human population</i> <i>Local environment</i>	Air, water runoff	<p>Due to the nature of the waste activity the risk of Fire could be low.</p> <p>A brief summary of the measures which will be employed is as follows:</p> <ul style="list-style-type: none"> • incompatible materials will not be accepted at the site; • Fire Procedures in place; • fire extinguishers will be provided at designated locations; • smoking will not be permitted in operational areas of the site; • working practices will ensure the assessment of fire hazards and training of employees in fire prevention, e.g. the use of fire extinguishers and emergency procedures; and • no wastes will be burned on the site and any fire at the site will be treated as an emergency. • In the event of a major fire, the following action will be taken: • the Site Manager /Senior and Fire Brigade will be notified immediately and the Environment Agency as soon as practicable; • the burning area will be isolated and attempts will be made to extinguish the fire utilising the onsite fire extinguishers, if safe to do so; and • the site and buildings will be evacuated. 	Low	<p>Nuisance (smoke and fumes) and harm to human health.</p> <p>Water contamination (runoff)</p>	Not significant
Spillage and Leakage	Local land quality, surface water and groundwater.	Runoff and percolation	To prevent loss of containment and minimise the risk and impact of releases	Low	Contamination of groundwater and	Not significant

	<p><i>Site personnel, emergency services personnel and local human population</i></p>	<p>through ground.</p> <p>Direct exposure and transport via air</p>	<p>the following measures will be implemented:</p> <ul style="list-style-type: none"> • Containment system: any facilities for the storage of oils, fuels or chemicals will be sited above ground on impervious bases and surrounded by impervious bund walls. The volume of the bunded compound will be at least the equivalent to the capacity of the tank plus 10%. All filling points, vents and gauges will be located within the bund. • Storage vessels: storage tanks will be constructed to the appropriate British Standard; • Inspection: tanks will be inspected visually on a daily basis by site staff to ensure the continued integrity of the tanks, and identify the requirement for any remedial action; • Spill kits: materials suitable for absorbing and containing minor spillages will be maintained on site; and • Monitoring techniques: the site staff will undertake daily monitoring for evidence of spillage and leakage. • In the event of any potentially polluting leak or spillage occurring on site, the following action will be taken: • Minor spillages will be cleaned up immediately, using sand or proprietary absorbent. The 		<p>surface water.</p> <p>Harm to human health.</p>	
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			<p>resultant materials will be placed into containers and will then be removed from site and disposed of at a suitably permitted facility. The incident will be logged in the site diary.</p> <ul style="list-style-type: none"> • Any dry wastes spilled on site will be quarantined immediately and controlled by the Site Manager. Wastes will be re bagged and stored within the container. • In the event of a major spillage, which is causing or is likely to cause polluting emissions to the environment, immediate action will be taken to contain the spillage and prevent liquid from entering surface water or drains. The spillage will be cleared immediately and placed in containers for offsite disposal, and the Environment Agency will be informed. • The spillage procedure, included in the EMS, provides further information with respect to spillages on site. • An emergency spillage management plan will be produced and will be incorporated within the accident management plan. • Wastes stored upon impermeable concrete hardstanding and the site is fully bunded to prevent the escape of surface water to external drainage systems. 			
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			<ul style="list-style-type: none"> • There are no significant quantities of chemicals kept onsite and therefore little potential for major spills. • Site procedures will be in place to ensure that spill kit inventories are routinely checked and replacements ordered as required. 			
Security and Vandalism	Personnel on site, emergency service workers.		<p>The following security measures are in place:</p> <ul style="list-style-type: none"> • Security gates: the site entrance will be locked at all times when the facility is unattended and when the site is not in use; • CCTV is installed around the site with external monitoring by the Operator and the external Security Company. • Authorised access system: all visitors to the site will be required to register in the visitor's book and sign out again on exit to minimise the risk of unauthorised visitors being present on site; and • Monitoring techniques: operational procedures, including regular inspections, will ensure continual monitoring of security provision at the site. • In the event of a breach of security at the site, the cause will be investigated and appropriate mitigation measures implemented. Records to be maintained include inspections 	Low	<p>Nuisance and harm to human health.</p> <p>Contamination of land and surface water.</p>	Not significant

			and maintenance of security fencing and gates, breaches of security, investigations and actions taken.			
Flooding	<i>Site personnel and local human population Local environment</i>	Overland	<ul style="list-style-type: none"> • There are surface water features within the 170m site boundary. • According to the UK government Flood Map for Planning, the site lies within flood zone 1. This means the site has a very low risk of flooding. • Evacuation procedures will be implemented in the event of flooding. • The Site Manager will be responsible for implementing risk management measures. 	Low	Inundation of site with flood water	Not significant
Litter	<i>Local residents</i>	Windblown/Air	<ul style="list-style-type: none"> • The site access and concrete hardstanding shall be swept as necessary. • All processed waste storage takes place internally. • Vehicles delivering waste to the site / collecting waste are covered. • The site has robust housekeeping measures in place. • Any waste generated by the facility will be disposed of at the appropriate onsite location and subject to the general site waste management plan. • The site shall be inspected daily by the Site Manager and any litter or accumulated debris shall be dealt with immediately. 	Low: Little potential for waste to be generated	Nuisance	Very Low: – due to the proposed management techniques

3.0 HABITATS RISK ASSESSMENT

3.1 Sensitivity of receptors

See Ecology report and Table below.

Nature and Heritage Conservation

Screening Report: SR2010 No 12

Reference	EPR/KB3209KR/V002
NGR	NZ 28680 81990
Buffer (m)	30
Date report produced	11/11/2022
Number of maps enclosed	2

The nature conservation sites and/or protected species and habitats identified in the table below must be considered in your application.

As you have not met the criteria for a standard rules permit, you will need to contact us for further advice on the type of permit you should apply for. Please submit a request through this link: <https://www.gov.uk/government/publications/environmental-permit-pre-application-advice-form>


Nature and heritage conservation sites	Screening distance (m)	Further information
Special Protection Area (pSPA or SPA)	500	Joint Nature Conservation Committee
Northumberland Marine		
Sites of Special Scientific Interest (SSSI)	500	Natural England
Northumberland Shore		

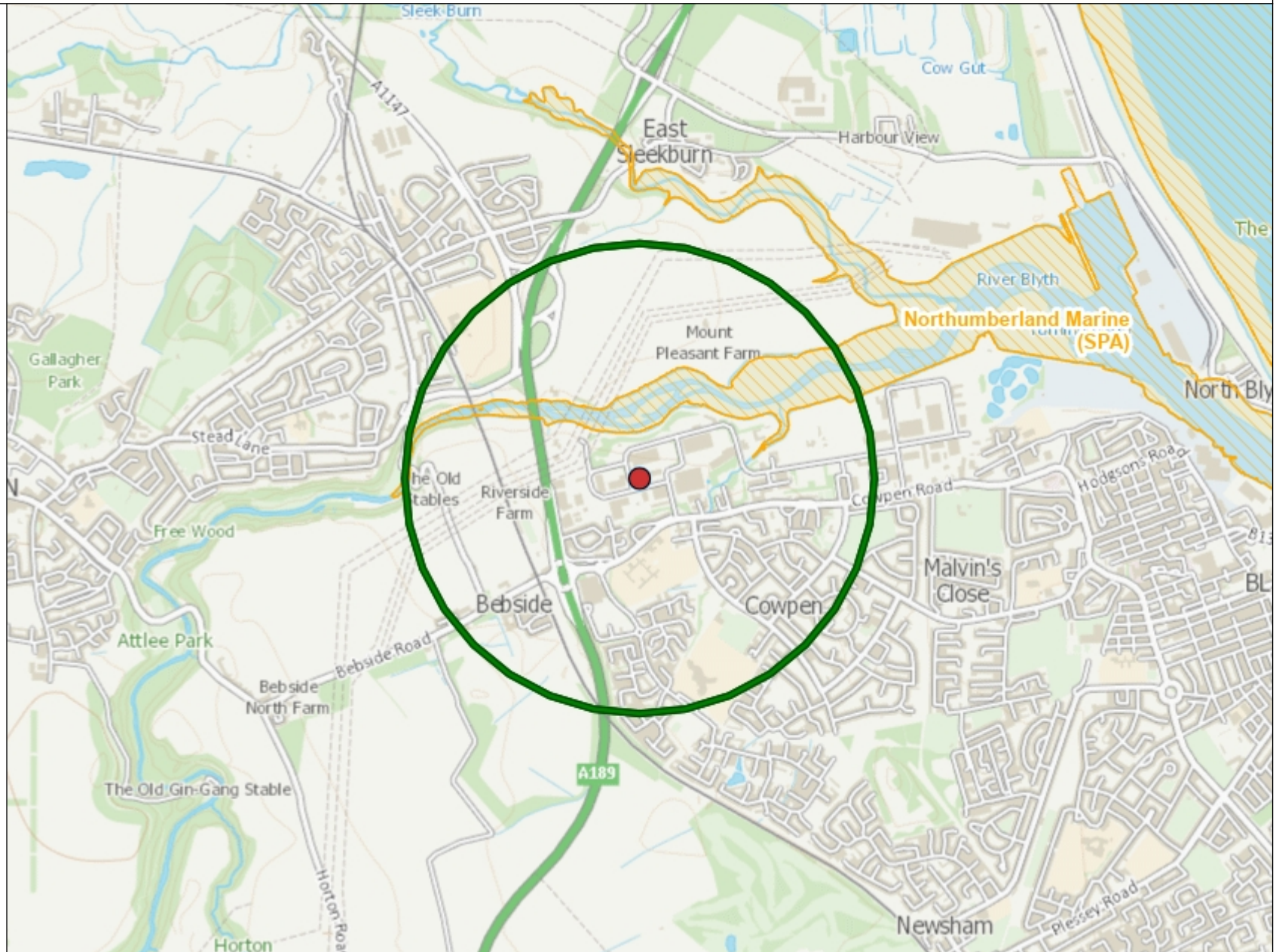
You are advised to obtain the necessary licences, or agree mitigation with the relevant bodies, for example Natural England or wildlife trusts before submitting your application.

Please note 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.

Special Protection Areas

Legend

 SPA (England)



1: 25,000


0 625

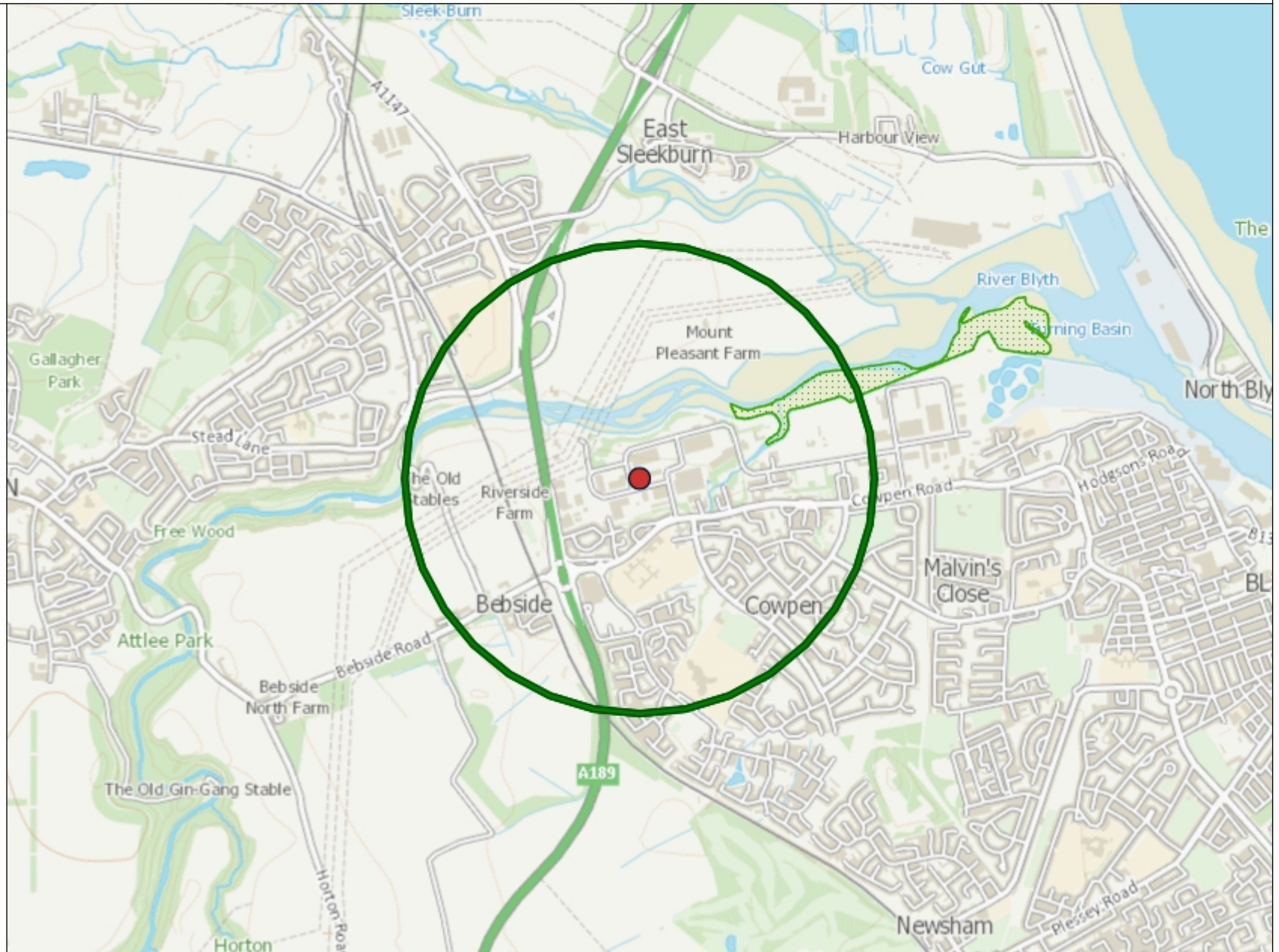
Metres



Sites of Special Scientific Interest

Legend

 SSSI (England)



1: 25,000

0 625

Metres



Special Protection Area (SPA) Citation

EC Directive 79/409 on the Conservation of Wild Birds Special Protection Area (SPA)

Name: Northumberland Marine SPA

Counties/Unitary Authorities: Northumberland, North Tyneside

Boundary of the SPA:

The landward boundary of the SPA covers the coastline from Scremerston near Berwick-Upon-Tweed in the north to Blyth in the south. Along this stretch of coast the boundary will follow the Mean High Water mark except around the existing Coquet Island SPA and Farne Islands SPA where the boundary will be defined by the Mean Low Water mark so as to abut the existing boundaries of those 2 SPAs where terns are already features. The seaward boundary extends up to 18 km out to sea on the basis of an analysis which identified areas of sea with the characteristics typical of areas used most heavily for foraging by breeding terns at existing colonies.

Size of SPA: The SPA covers an area of 88,498.35 ha.

Site description:

Northumberland Marine SPA is located on the Northumberland coast between Blyth and Berwick-Upon-Tweed. The coastal parts of the site consist of sandy bays separated by rocky headlands backed by dunes or soft and hard cliffs. There are extensive areas of inter-tidal rocky reef, long sandy beaches at Beadnell, Embleton and Druridge Bay and extensive sand and mud flats at Budle Bay and Fenham Flats at Lindisfarne. Discrete areas of intertidal mudflats and estuarine channels are also included where the site extends into the Aln, Coquet, Wansbeck and Blyth estuaries. The open coast habitats extend into the subtidal zone, where large shallow inlets and bays and extensive rocky reefs are present. Further offshore, soft sediments predominate.

Qualifying species:

The site qualifies under **Article 4** of the Birds Directive (2009/147/EC) for the following reasons (summarised in Table 1):

- The site regularly supports more than 1% of the Great Britain breeding populations of five species listed in Annex I of the EC Birds Directive. Therefore the site qualifies for SPA Classification in accordance with the UK SPA selection guidelines (stage 1.1).
- The site regularly supports more than 1% of the biogeographical population of two regularly occurring migratory species not listed in Annex I of the EC Birds Directive. Therefore the site qualifies for SPA Classification in accordance with the UK SPA selection guidelines (stage 1.2).

Table 1 Summary of qualifying ornithological interest species in Northumberland Marine SPA

Species	Count (period)	% of subspecies or population	Interest type
Sandwich tern <i>Sterna sandvicensis</i>	4,324 individuals (2010-2014) ¹	19.66% of GB population ⁵	Annex 1
Common tern <i>Sterna hirundo</i>	2,572 individuals (2010-2014) ¹	12.86% of GB population ⁵	Annex 1

Arctic tern <i>Sterna paradisaea</i>	9,564 individuals (2010-2014) ¹	9.02% of GB population ⁵	Annex 1
Roseate tern <i>Sterna dougallii</i>	160 individuals (2010-2014) ²	93.02% of GB population ⁵	Annex 1
Little tern <i>Sternula albifrons</i>	90 individuals (2010-2014) ²	2.37% of GB population ⁵	Annex 1
Puffin <i>Fratercula arctica</i>	108,484 individuals (2008-2013) ^{1,3}	1.05% of biogeographic population ⁶	Regularly occurring migratory species
Guillemot <i>Uria aalge</i>	65,751 individuals (2010-2014) ^{1,4}	1.72% of biogeographic population ⁷	Regularly occurring migratory species

Seabirds that undertake maintenance and/or foraging behaviour within Northumberland Marine SPA include those that breed at existing SPAs in Northumberland. Specifically these are; Lindisfarne, Northumbria Coast, Farne Islands and Coquet Island SPAs. Accordingly the numbers listed in the table above are summed across the relevant site specific population estimates.

¹ Data from: Seabird Monitoring Programme (SMP) and colony managers (Pairs multiplied by 2 to arrive at breeding adults; this rule applies to all species listed within the table, with the exception of guillemot.)

² Data from: Directly from colony managers (Pairs multiplied by 2 to arrive at breeding adults; this rule applies to all species listed within the table, with the exception of guillemot.)

³ Results of puffin censuses from the Seabird Monitoring Programme (SMP)

⁴ Guillemots are counted as "individuals on land"; this is multiplied by a correction factor of 0.67 (Harris 1989) to translate to breeding pairs and multiplied by 2 to yield an estimate of the number of breeding adult individuals.

⁵ GB breeding populations derived from Musgrove *et al.* (2013)

⁶ Biogeographic populations of 5,176,257 pairs (10,352,514 breeding individuals) derived from UK SPA and Ramsar Scientific Working Group (2014) paper: *International Population Estimates for some seabird species*. Figure derived in line with Mitchell *et al.* 2004 on the basis that puffins which used to be considered to be of the race *Fratercula arctica grabae* are now combined with those of the nominate race of *F.a.arctica* and a biogeographic population estimate derived by summing birds breeding in: France, GB, Isle of Man and Channel Islands, All-Ireland, all of Norway, Iceland and Russia (but excluding birds listed as *F.a.arctica* in Mitchell *et al.* (2004) and breeding in Canada, USA and Greenland.

⁷ Birds breeding at the Farne Islands and hence included within the Northumberland Marine pSPA are assumed to belong to the nominate race of *Uria aalge aalge* in line with UK SPA and Ramsar Scientific Working Group (2014) paper: *International Population Estimates for some seabird species* in which a population midpoint estimate of 1,909,417 pairs (rounded to 3,820,000 individuals) is given.

Assemblage qualification:

The site qualifies under **article 4.2** of the Directive (2009/147/EC) as it used regularly by over 20,000 seabirds in any season:

During the breeding season (2010-2014), the area supports 214,669 individual seabirds including: great cormorant (230 breeding adults), European shag (1,677 breeding adults), black-headed gull (8,745 breeding adults) and black-legged kittiwake (8,667 breeding adults), all of which are present in nationally important numbers (1.37%, 3.11%, 3.36% and 1.17% of the UK populations respectively) and therefore are named as key assemblage components.

Principal bird data sources:

Colony counts from JNCC Seabird Monitoring Programme contributed by colony managers: Natural England (Lindisfarne SPA), National Trust (Northumbria Coast and Farne Islands SPA) and RSPB (Coquet Island SPA), supplemented by most up to date counts in some instances from those colony managers.

Other data sources can be found in the Northumberland Marine SPA Departmental Brief https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/492864/northumberl-and-departmental-brief.pdf