

**APPENDIX C**  
**ENVIRONMENTAL RISK ASSESSMENT (ERA)**



**AN APPLICATION FOR A BESPOKE ENVIRONMENTAL  
PERMIT FOR THE TREATMENT OF UP TO 100,000  
TONNES OF WASTE PER YEAR TO PRODUCE  
AGGREGATE AT NORTHAMPTON RAILHEAD, SEGRO  
LOGISTICS PARK, NORTHAMPTON,  
NORTHAMPTONSHIRE**

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

Report reference: GRS/NOR/PF/5737/01/ERA  
December 2023



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Appendix A Environment Agency Nature and Heritage Conservation Screening Report

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

## 1. Introduction

- 1.1** MJCA is commissioned by GRS (Roadstone) Limited (GRS) to prepare an application for a bespoke Environmental Permit for the treatment of up to 100,000 tonnes of waste per year to produce aggregate at Northampton Railhead, Segro Logistics Park, Northampton, Northamptonshire (the site).
- 1.2** The waste activity which will be carried out at the site will comprise the operation of an Incinerator Bottom Ash Aggregate (IBAA) blending facility. The IBAA activities which will be carried out at site will comprise the acceptance, under List of Waste Code (LoW) 19 12 12, of IBAA that has been processed elsewhere to meet the BS13242 specification. The IBAA will be stored on site before being blended with primary aggregates or aggregates produced in accordance with the Aggregates Quality Protocol<sup>1</sup>. The IBAA will be blended to form an aggregate output to meet a required specification which will be sent off site for use. The processed IBAA will be imported to the site by road and the aggregate product will predominantly be exported from the site by road. It is possible that aggregate product may also be exported by rail. Primary aggregates or aggregates produced in accordance with the Aggregates Quality Protocol will predominantly be imported to the site by rail although they may also be imported to the site by road.
- 1.3** Only LoW Code 19 12 12 will be accepted at the site and the LoW Coded 19 12 12 will comprise *'treated bottom ash including IBA/IBAA and slag other than that containing dangerous substances only'*. There will be no other wastes accepted at the site or permitted activities carried out at the site.
- 1.4** The site is centred approximately at National Grid Reference (NGR) SP 74428 54732 approximately 5.5km south of the centre of Northampton and 1km west of Junction 15 of the M1 Motorway. The site boundary the subject of the permit application is shown on Figure 1 of the application report and covers an area of approximately 2.2 hectares. The permit application boundary covers the whole of the GRS Northampton Railhead. The operations the subject of the permit will be limited only to the waste related operations and not the wider railhead operations.

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<sup>1</sup> WRAP (Waste & Resources Action Programme) Quality Protocol for Aggregates from inert waste, end of waste criteria for the production of aggregates from inert waste published on 22 October 2013

- 1.5** The layout of the site the subject of the permit application is shown on Figure 2 of the application report. The site, including the IBAA storage and blending area will be located in the open air. The surface of the site including the IBAA storage and blending area will comprise an impermeable surface with a sealed drainage system. The IBAA storage and blending areas will be delineated on three sides by concrete block walls up to 4m high. In summary the IBAA blending operations will be carried out by loading shovels and the placement in bays of alternative layers of IBAA and aggregate. Effective dust suppression will be provided.
- 1.6** This document comprises a nuisance and amenity environmental risk assessment (ERA) prepared generally in accordance with Environment Agency guidance entitled 'Risk assessments for your environmental permit' published on GOV.UK<sup>2</sup>. The ERA considers potential receptors and pathways for impacts based on the understanding of the environment surrounding the site. A risk screening matrix is provided in Table ERA 1 and the assessment is presented in Table ERA 2.
- 1.7** The selection of potential receptors has been informed by information presented on the Defra MAGIC website, Google Earth and the Environment Agency Nature and Heritage Conservation Screening Report provided during basic pre-application advice provided at Appendix ERA A. The risk assessment takes into consideration receptors within 500m of the site with the exception of statutorily designated nature conservation sites for which a distance of up to 2km has been specified.
- 1.8** Based on information on the DEFRA MAGIC website there are no Special Protection Areas (SPA), Special Areas of Conservation (SACs), National Nature Reserves (NNRs), Local Nature Reserves (LNR) or Local Wildlife Sites (LWS) located within 2km of the site. There is one Site of Special Scientific Interest (SSSI) within 2km of the site boundary. Roade Cutting SSSI is a geological SSSI located approximately 1.3km south of the site in a railway cutting. Based on the information available on MAGIC no World Heritage Sites, Scheduled Monuments or Listed Buildings are located within 500m of the site.
- 1.9** The Nature and Heritage Conservation Screening Report provided at Appendix ERA A identified a Code 2 protected species within 250m of the site. We understand that

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<sup>2</sup> Available at <https://www.gov.uk/guidance/risk-assessments-for-your-environmental-permit>. Published 1 February 2016. Last updated 31 August 2022. Last accessed 31 July 2023.

the Code 2 species referred to in the screening report is reference to Great Crested Newts (GCNs). The Screening Report does not include an assessment of the habitat in the vicinity of the GCNs and provides only factual information in relation to the potential GCN locations with reference to information provided by Natural England and the Appropriate Local Record Centre.

- 1.10** FPCR Environment and Design Ltd undertook ecological survey work in 2014, 2016 and 2017 in relation to the potential presence of GCNs and the habitat at and in the vicinity of the site. The work undertaken by FPCR was in support of the application for the Northampton Gateway Rail Freight Interchange Development Consent Order 2019<sup>3</sup> which was made on 9 October 2019 and came into force on 30 October 2019. The operations the subject of the permit will also be the subject of the Northampton Gateway Rail Freight Interchange Development Consent Order 2019. The report identified two ponds (P1 and P2) within 250m of the site with the potential for the presence of GCNs. The approximate locations of ponds P1 and P2 are shown on Figure 1 of the application report. The survey identified pond P2 as having a *'Below Average'* pond suitability and determined that pond P1 provided excellent habitat for GCNs. The report identified that P2 was infilled prior to the 2016 surveys. An Impact Assessment and Mitigation Strategy was provided in Section 5 of the report to *'provide details of mitigation/compensation proposed for GCNs for the proposed application sites along with an assessment of residual impacts as a result of the proposals'*. Section 5 of the report states *'These measures and the proposed enhancements designed as part of the final site layout are considered sufficient to ensure that the Favourable Conservation Status (FCS) of GCN is not just maintained but also enhanced.'*
- 1.11** The mitigation included in the FPCR report includes the installation of Temporary Amphibian Fencing (TAF) around all site areas within 250m of pond P1 and the translocation of any captured GCNs to the receptor area nearest the site of capture. The mitigation was implemented as part of the requirements of the Northampton Gateway Rail Freight Interchange Development Consent Order 2019. Given that the GCNs and the GCN habitat has been mitigated as part of the development of the site pursuant to the Northampton Gateway Rail Freight Interchange Development Consent Order 2019 it is considered not necessary to give any further consideration

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<sup>3</sup> <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR050006/TR050006-001344-191009%20Northampton%20Gateway%20Rail%20Freight%20Interchange%20Order%20-%20PINS.pdf>

to GCNs in this permit application. An application for Standard Rules Environmental Permit SR2010 No12 was submitted to the EA in August 2023 (reference EPR/WE3197AC/A001) but it was concluded by the EA that due to the proximity of the GCNs to the site the proposals were inconsistent with the Standard Rules and it is necessary to apply for a bespoke Environmental Permit for the proposed IBAA blending operations.

- 1.12** A Dust and Particulate Matter Emissions Management Plan (DEMP)<sup>4</sup> has been prepared to support the permit application. The DEMP provides further details of the receptors in the vicinity of the site.
- 1.13** A Noise Impact Assessment (NIA)<sup>5</sup> has been prepared to support the permit application. It is concluded in the NIA that there will be no significant or unacceptable adverse impact at noise sensitive premises in the vicinity of the site.

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<sup>4</sup> Report reference GRS/NOR/PF/5737/01/DEMP dated November 2023

<sup>5</sup> Complete NIA reference/date when available

## 2. Conclusion

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



**TABLES**

Table ERA 1 Risk screening matrix (waste treatment activity)

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

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

X = generic receptor type present and generic hazard considered as part of this assessment set out in Table ERA 2

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

<sup>2</sup> Although Road Cutting SSSI is located approximately 1.3km south of the site, given that the SSSI comprises a geological SSSI it is considered unnecessary to consider the SSSI further.

Table ERA 2 – Assessment of nuisance and amenity risks associated with the treatment of waste at Northampton Railhead

What do you do that can harm and what could be harmed?			Assessing the risk			Managing the risk	
Hazard	Receptor (see Table ESSD 2)	Pathway	Probability of exposure	Consequence	What is the overall risk?	Risk management	What is the residual risk?
What has the potential to cause harm?	What is at risk? What do I wish to protect?	How can the hazard get to the receptor?	How likely is this contact?	What is the harm that can be caused?	What is the risk? The balance of probability and consequence	What measures will you take to reduce the risk? If it occurs – who is responsible for what?	What is the risk that still remains?
<b>Odour</b>							
There are no potential sources of odour at the site.	Local human population	Air	Negligible	Nuisance from odour	Negligible	The waste accepted will be processed IBAA. Odour is not associated with this waste type. Waste acceptance procedures will be in place.	Negligible
<b>Noise</b>							
Blending, mobile plant and vehicles	Local human population	Air	Medium to low	Nuisance from noise	Medium to low	The potential impacts of noise from the development have been assessed and a Noise Impact Assessment (NIA) has been provided with the application. It is concluded in the NIA that there will be no significant or unacceptable adverse impact at existing noise sensitive premises in the vicinity of the site.	Very low
<b>Vibration</b>							
Crushing, screening, mobile plant and vehicles	Local human population	Ground	Low to very low	Nuisance from vibration	Medium to low	The potential impacts of vibration from the development have been considered as part of the Noise Impact Assessment provided with the application.	Very low
<b>Fugitive emissions</b>							
Particulates from access routes, waste delivery, waste storage and waste treatment	Local human population / properties / farmland arable / public	Air	Low	Deposition of particulate matter	Medium to low	A Dust and Particulate Matter Emissions Management Plan (DEMP) has been prepared to support the operation of the site. The DEMP describes the operations at the site which may have the potential to have an impact on air quality as a	Low to very low

What do you do that can harm and what could be harmed?			Assessing the risk			Managing the risk	
Hazard	Receptor (see Table ESSD 2)	Pathway	Probability of exposure	Consequence	What is the overall risk?	Risk management	What is the residual risk?
What has the potential to cause harm?	What is at risk? What do I wish to protect?	How can the hazard get to the receptor?	How likely is this contact?	What is the harm that can be caused?	What is the risk? The balance of probability and consequence	What measures will you take to reduce the risk? If it occurs – who is responsible for what?	What is the risk that still remains?
	highway / water bodies / sensitive habitat					result of emissions of particulate matter, describes the operational controls which will be implemented to minimise emissions and describes the monitoring which will be carried out to confirm the effectiveness of the management controls.	
The wastes that will be accepted have a very low potential to generate litter or to attract birds, vermin or insects.	Local human population / properties / farmland arable / public highway / water bodies / sensitive habitat	Air	Negligible	Nuisance associated with litter	Negligible	Acceptance procedures will be in place. The processed IBAA accepted at the site will have a very low potential to generate litter, attract scavenging animals and scavenging birds or insects.	Negligible
Mud and debris deposited on the public highway	Public highway	Vehicle movements	Low	Mud on the public highway	Low	In order to minimise the deposition of mud and debris on the public highway the IBAA blending operations will be carried out on newly formed areas of impermeable concrete surfacing. The concrete surface will be maintained in a condition which is consistent with minimising mud and debris on the public highway. Hand held high pressure wheel cleaning equipment will be available at the site for use as necessary before leaving the site. Vehicles will be instructed to use the wheel cleaning equipment if necessary prior to returning to the local road network. The wheel cleaning equipment will be maintained in full working order.	Low

What do you do that can harm and what could be harmed?			Assessing the risk			Managing the risk	
Hazard	Receptor (see Table ESSD 2)	Pathway	Probability of exposure	Consequence	What is the overall risk?	Risk management	What is the residual risk?
What has the potential to cause harm?	What is at risk? What do I wish to protect?	How can the hazard get to the receptor?	How likely is this contact?	What is the harm that can be caused?	What is the risk? The balance of probability and consequence	What measures will you take to reduce the risk? If it occurs – who is responsible for what?	What is the risk that still remains?
<b>Accidents</b>							
Waste stored and treated on site	Local human population gaining unauthorised access to the waste operation	Direct physical contact	Low	Bodily injury	Low	The waste type accepted at the site should not cause harm to human health by virtue of its composition. Security measures comprising the use of fencing, safety signs and regular inspections will be implemented to minimise the potential for unauthorised entry to the site. The main site gates will be locked outside normal working hours.	Very low
Vehicle movements on site	Local human population gaining unauthorised access to the site	Direct physical contact	Low	Bodily injury	Medium	Security measures will be implemented to minimise the potential for unauthorised entry to the site. Vehicles will employ suitable non-tonal reversing alarms.	Low
Accidental release of fuel	Water resources	Infiltration to ground	Low	Contamination of water resources	Medium	Company operational, maintenance, inspection and accident management procedures will be in place. Spillage kits will be available and site personnel will be trained in their use.	Low

What do you do that can harm and what could be harmed?			Assessing the risk			Managing the risk	
Hazard	Receptor (see Table ESSD 2)	Pathway	Probability of exposure	Consequence	What is the overall risk?	Risk management	What is the residual risk?
What has the potential to cause harm?	What is at risk? What do I wish to protect?	How can the hazard get to the receptor?	How likely is this contact?	What is the harm that can be caused?	What is the risk? The balance of probability and consequence	What measures will you take to reduce the risk? If it occurs – who is responsible for what?	What is the risk that still remains?
Flooding	The generic receptors identified in Table ERA 1	Flood waters	Low	Flooding associated with the generic receptors identified in Table ERA 1	Low	Based on the information provided in the Site Condition Report included with the permit application the site is located within Flood Zone 1 which is land that has a low probability of flooding with less than 1 in 1,000 annual probability of river or sea flooding. The site is within an area with a very low risk of flooding from surface water. Based on the information provided in the Envirocheck report the site is located within an area with limited potential for groundwater flooding to occur.	Low
Fire	Atmospheric emissions	Air	Very low	Nuisance from smoke and odour Contamination of water resources	Very low	As the waste accepted at the site will be non-flammable and non-combustible the risk of occurrence of fires is negligible. As a result associated risks from fire-fighting water being discharged to controlled waters will be negligible.	Very low
Waste operations may cause harm to and deterioration of nature conservation sites.	Protected sites - European sites and SSSIs	Air	Negligible	Harm to protected site through contamination	Negligible	There are no relevant nature conservation sites. See note 2 to Table ERA 1.	Negligible
Waste operations may cause harm to and deterioration of nature conservation sites.	Wildlife sites of regional or local importance and protected habitat (including	Air or run off	Very Low	Harm to protected site through toxic contamination, nutrient enrichment, smothering, disturbance, predation etc.	Very Low	There are no relevant nature conservation sites. Details of the mitigation undertaken in respect of GCNs pursuant to the Development Consent Order are presented in paragraphs 1.9 to 1.11 of this ERA.	Negligible

What do you do that can harm and what could be harmed?			Assessing the risk			Managing the risk	
Hazard	Receptor (see Table ESSD 2)	Pathway	Probability of exposure	Consequence	What is the overall risk?	Risk management	What is the residual risk?
What has the potential to cause harm?	What is at risk? What do I wish to protect?	How can the hazard get to the receptor?	How likely is this contact?	What is the harm that can be caused?	What is the risk? The balance of probability and consequence	What measures will you take to reduce the risk? If it occurs – who is responsible for what?	What is the risk that still remains?
	Great Crested Newts (GCN)s						
Waste operations may cause harm to and deterioration of heritage conservation sites.	Designated heritage sites – Scheduled Monuments and Listed Buildings	Not applicable. There are no relevant heritage conservation sites.					



**APPENDICES**

**APPENDIX A**  
**ENVIRONMENT AGENCY NATURE AND HERITAGE CONSERVATION SCREENING**  
**REPORT**

# Nature and Heritage Conservation

## Screening Report: SR2010 No 12

Reference	EPR/XP3825SS/P001
NGR	SP 74428 54732
Buffer (m)	45
Date report produced	07/07/2023
Number of maps enclosed	1

**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>

### Protected Species

Code 2

### Screening distance (m)

within 250m

### Further Information

[Natural England](#)

[Appropriate Local Record Centre \(LRC\)](#)

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

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.

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.

customer service line  
03708 506 506

incident hotline  
0800 80 70 60




floodline  
0845 988 1188

[www.environment-agency.gov.uk](http://www.environment-agency.gov.uk)

# Protected Species

## Legend

Protected species screened for Env Permits - complete set

-  Protected species, non fish
-  Protected fish
-  Protected fish migratory route

