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AN APPLICATION TO VARY ENVIRONMENTAL PERMIT NUMBER EPR/LB3733AF IN RESPECT OF WELLINGBOROUGH RAILHEAD, NEILSONS YARD, MEADOW CLOSE, WELLINGBOROUGH, NORTHAMPTONSHIRE

NUISANCE AND AMENITY ENVIRONMENTAL RISK ASSESSMENT (ERA)

Report reference: GRS/WE/JAD/5732/01/ERA
August 2023

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1. Introduction

1.1 MJCA is commissioned by GRS (Roadstone) Limited (GRS) to prepare an application to vary Environmental Permit Number EPR/LB3733AF (the permit) for the inert and excavation waste transfer station operated by GRS at Wellingborough Railhead, Neilsons Yard, Meadow Close, Wellingborough, Northamptonshire, NN8 4BH (the site). The permit currently comprises a Standard Rules Permit (SRP) SR2009 No6 – inert and excavation waste transfer station with treatment permitted to accept up to 250,000 tonnes of waste per year (the SRP). The currently authorised activities at the site specified in Table S2.1 of the permit comprise *treatment consisting only of manual sorting, separation, screening or crushing of waste into different components for disposal, (no more than 50 tonnes per day) or recovery*. The environmental risks associated with the current activities at the site are addressed by the Environment Agency generic risk assessment for Standard Rules SR2009 No6[1].

1.2 The proposed changes to the permit which are the subject of the variation application comprise:

- To increase the total quantity of waste authorised to be accepted at the site from 250,000 tonnes per year to 450,000 tonnes per year.
- To add List of Waste (LoW) code 19 12 12 incinerator bottom ash aggregate (IBAA) to the LoW codes authorised to be accepted at the site.
- To establish a portion of the railhead to provide capacity to accommodate stocking and blending of IBAA to generate a recycled aggregate/construction material product. The location of the

1.3 As a result of increasing the annual tonnage limit and the additional waste code at the site the permit will become a bespoke permit. The proposed activities will be undertaken at the site in conjunction with those specified in Table 2.1 of the current permit (described in paragraph 1.1).

1.4 The IBAA activities which will be undertaken at the proposed blending facility will comprise the acceptance, under LoW 19 12 12, of up to 200,000 tonnes per annum

[1] Available at https://www.gov.uk/government/publications/sr2009-no6-inert-and-excavation-waste-transfer-station-with-treatment-below-250kte. Last updated 3 April 2019. Last accessed 31 July 2023.

(tpa) 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[2]. The IBAA will be blended to form an aggregate output which will be sent off site for use. Consistent with the inert and excavation waste transfer and treatment operations, processed IBAA will be imported to the railhead site by road and the aggregate product will be exported from the railhead site by road. The layout of the site including the area in which the inert and excavation waste transfer and treatment operations are already authorised to be carried out and the layout of the IBAA proposed blending facility is shown on Figure 2 provided with the application.

1.5 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[3]. A risk screening matrix is provided in Table ERA 1 and the assessment is presented in Table ERA 2.

1.6 The ERA considers potential receptors and pathways for impacts based on the understanding of the environment surrounding the site. The assessment of the risks associated with the site are based on the generic risk assessment for Standard Rules SR2009 No6 taking into consideration the proposed additional waste throughput, the additional LoW code and the blending activity.

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 Areas of Conservation (SACs), National Nature Reserves (NNRs), Local Nature Reserves (LNR) or Local Wildlife Sites (LWS) located within 2km of the site. Upper Nene Valley

[2] 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

[3] 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.

Gravel Pits Site of Special Scientific Interest (SSSI), Special Protection Area and Ramsar site is located approximately 1.9km southeast of the site boundary. Finedon Top Lodge Quarry SSSI is located approximately 1.9km east of the site boundary. Based on the information available on MAGIC there are no Scheduled Monuments, World Heritage Sites or Listed Buildings within 500m of the site.

1.9 The Environment Agency Nature and Heritage Conservation Screening Report identifies one Protected Habitat in the form of deciduous woodland within 50m of the site. A copy of the Environment Agency Nature and Heritage Conservation Screening Report is presented at Appendix A of the ERA.

1.10 A Dust and Particulate Matter Emissions Management Plan (DEMP)[4] has been prepared to support the application to vary the permit. The DEMP provides further details of the receptors in the vicinity of the site.

1.11 A Noise Impact Assessment has been prepared to the support the application to vary the permit. ***[Note to GRS – this paragraph will be updated to include the conclusions of the NIA once the NIA has been completed]***

[4] Report reference GRS/WE/JAD/5732/01/DEMP dated August 2023

2. Conclusion

2.1 The ERA presented in Table ERA 2 that has been completed to support the application to vary the permit demonstrates that the operation of the facility with the implemented controls has 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 / GENERIC RECEPTORS[1]	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
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	x	x					
FARMLAND WITH LIVESTOCK													
FARMLAND ARABLE													
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 / GENERIC RECEPTORS[1]	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
SITE OF SPECIAL SCIENTIFIC INTEREST (within 2km)					x	x	x	x					
SPECIAL AREA OF CONSERVATION (within 2km)													
SPECIAL PROTECTION AREA OR OTHER RELEVANT SSSI (within 2km)					x	x	x	x					
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

[1] All generic receptors within 500m have been identified unless an alternative distance has been identified.

Table ERA 2 – Assessment of nuisance and amenity risks associated with the treatment of waste at Wellingborough 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?
Odour							
There are no potential sources of odour at the site.	Local human population	Air	Negligible	Negligible	Negligible	The wastes accepted will be processed IBAA and construction and demolition wastes. Odour is not associated with this waste type. Waste acceptance procedures will be in place.	Negligible
Noise							
Crushing, screening, 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 has been provided with the application. ***[This section will be updated to include the conclusions of the NIA once the NIA has been completed]*** The proposed changes the subject of the application to vary the permit will not increase significantly the risk associated with noise emissions compared with the currently permitted activities.	Low
Vibration							
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 Assessment provided with the application.	Very low
Fugitive emissions							

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?
Particulates from access routes, waste delivery, waste storage and waste treatment	Local human population / properties / public highway / water bodies / sensitive habitat	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 result of emissions of particulate matter, describes the operational controls which are implemented to minimise emissions and describes the monitoring which is carried out to confirm the effectiveness of the management controls. The proposed changes the subject of the application to vary the permit will not increase significantly the risk associated with dust emissions compared with the currently permitted activities.	Low
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 / public highway / water bodies / sensitive habitat	Air	Negligible	Negligible	Negligible	Acceptance procedures will be in place. The processed IBAA accepted at the site will have a negligible 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	Wheel cleaning facilities already are provided in the wider railhead site. Vehicles associated with waste operations will use the wheel cleaning facilities when travelling from the site to the public highway. All site roads will be inspected daily and maintained in a condition consistent with minimising the risk of the accumulation of mud and debris on the	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. A mobile road sweeper will be used to clean the road surfaces at the railhead. Further information is provided in the DEMP.	
Fugitive emissions to water							
Contamination from wastes accepted and handled at the site	Groundwater/ surface water	Run off or infiltration	Low	Contamination of groundwater/ surface water	Low	The generic risk assessment for SR2009No6 confirms that the construction and demolition wastes currently permitted to be accepted at the site have a very low risk of contaminating groundwater and Condition 2.3.1 of the current permit specifies that these waste types are suitable for storage on hardstanding. These waste types will continue to be stored on hardstanding as currently. The proposed IBAA storage and blending operations will be carried out on an impermeable surface with a sealed drainage system.	Low
Accidents							
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 types that will be accepted at the site should not cause harm to human health by virtue of their composition. Security measures which are implemented currently in respect of the existing railhead operations comprising the use of fencing, safety signs and regular inspections will continue to be implemented to minimise the potential for unauthorised entry to the site. The main site gates are locked outside normal working hours.	Very low
Vehicle movements on site	Local human population	Direct physical contact	Low	Bodily injury	Medium	Security measures are implemented currently in respect of the existing railhead operations and will	Low

What do you do that can harm and what could be harmed?			Assessing the risk			Managing the risk	
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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?
	gaining unauthorised access to the site					continue to be implemented to minimise the potential for unauthorised entry to the site. Vehicles will employ suitable non-tonal reversing alarms.	
Accidental release of fuel	Water resources	Infiltration to ground	Low	Contamination of water resources	Medium	Company operational, maintenance, inspection and accident management procedures are in place and will be implemented. Spillage kits are available and site personnel are 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	A site specific Flood Risk Assessment (FRA) has been prepared to support the application for planning permission for the site. Based on the Environment Agency Flood Map for Planning the site is generally located in Flood Zone 1 with the exception of an area in the south east of the site which is shown to be located in Flood Zone 2. Based on the FRA, which includes a detailed review of the available flood modelling, the elevation of the site is greater than the elevation of the modelled 1 in 1,000 year flood event. On this basis, based on the more detailed review of information, the site is not located in the flood plain. Based on the FRA there will be no adverse effect on flood flows, levels or storage. The FRA includes information on surface water management which shows that the rate of runoff from the site will be reduced compared with the existing situation. ***[Note to GRS – the FRA has not yet been reviewed by the Planning authority and it may be necessary to update the ERA at a later date depending on the outcome of the review of the planning authority].***	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 are negligible.	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?
Waste operations may cause harm to and deterioration of nature conservation sites.	Protected sites - European sites and SSSIs	Air or run off	Very Low	Harm to protected site through contamination, nutrient enrichment, smothering, disturbance, predation etc.	Very Low	Measures are in place to minimise the risk of unacceptable impacts from the waste operations on the surrounding environment which will be protective also of European sites and SSSIs. The protected sites are located approximately 1.9km from the site. It is considered that the potential hazards from the permitted activities pose a negligible risk to the European sites and SSSIs.	Negligible
Waste operations may cause harm to and deterioration of nature conservation sites.	Wildlife sites of regional or local importance and protected habitat comprising deciduous woodland	Air or run off	Very Low	Harm to protected site through toxic contamination, nutrient enrichment, smothering, disturbance, predation etc.	Very Low	Measures are in place to minimise the risk of unacceptable impacts from the waste operations on the surrounding environment which will be protective also of local nature reserves and protected habitats including deciduous woodland. There are no Local Nature Reserves (LNR) or Local Wildlife Sites (LWS) located within 2km of the site. The proposed changes the subject of the application to vary the permit will not increase significantly the risk of harm to and deterioration of nature conservation sites. It is considered that the potential hazards from the permitted activities pose a very low risk to the deciduous woodland.	Very low
Waste operations may cause harm to and deterioration of heritage conservation sites.	Designated heritage sites – Scheduled Monuments and Listed Buildings	Direct physical contact	Very low	Deterioration of designated heritage sites	Very low	Measures are in place to minimise the risk of unacceptable impacts from the waste operations on the surrounding environment which will be protective also heritage conservation sites. There are no Scheduled Monuments or Listed Buildings within 500m of the site.	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?
						It is considered that the potential hazards from the permitted activities pose a negligible risk to heritage conservation sites.	

APPENDICES

APPENDIX A

ENVIRONMENT AGENCY NATURE AND HERITAGE CONSERVATION SCREENING REPORT

Nature and Heritage Conservation

Screening Report: Bespoke Waste

Reference	**EPR/XP3525SD/P001**
NGR	**SP 90458 69643**
Buffer (m)	**50**
Date report produced	**07/07/2023**
Number of maps enclosed	**1**

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

Protected Habitats	Screening distance (m)	Further Information
Deciduous Woodland	up to 46m	Natural England

Please note we have screened this application for protected and priority sites, habitats and species 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.

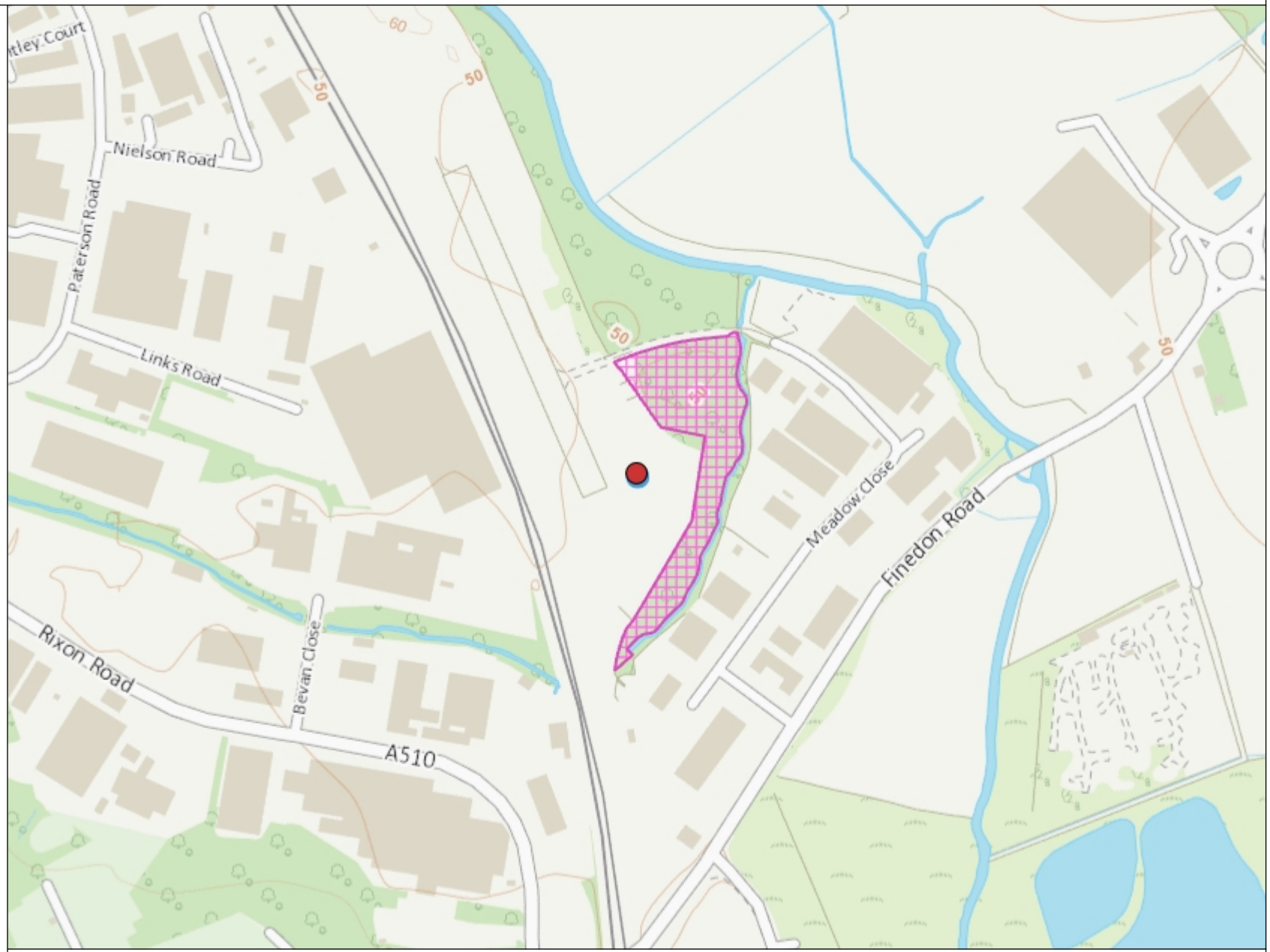
Please note the nature and heritage screening we have conducted as part of this report is subject to change as it is based on data we hold at the time it is generated. We cannot guarantee there will be no changes to our screening data between the date of this report and the submission of the permit application,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

Protected Habitats

Environment Agency

Legend

Protected Habitats screened for Env Permits



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