



**AN APPLICATION TO VARY ENVIRONMENTAL  
PERMIT NUMBER EPR/CB3738AC FOR THE DEPOSIT  
OF WASTE ON LAND AS A RECOVERY ACTIVITY TO  
DEVELOP THE HARESHILL FARM SITE FOR HIGHWAY  
AND EMPLOYMENT USE AS PART OF THE WIDER  
SOUTH HEYWOOD DEVELOPMENT, ROCHDALE**

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

Report reference: PCE/HA/AKM/5640/01/ERA  
June 2021



Technical advisers on environmental issues

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PCE/HA/AKM/5640/ERA

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## 1. Introduction

- 1.1 MJCA is commissioned by P Casey Enviro Limited (PCE) to prepare and submit an application to vary Environmental Permit number EPR/CB3738AC (the permit) for the deposit of waste on land as a recovery activity to develop the Hareshill Farm Site for highway and employment use as part of the wider South Heywood development in Rochdale, Lancashire.
- 1.2 The permit was issued to PCE on 8 March 2012 for the creation of a platform for the construction of an equestrian facility. Prior to the issue of the permit the site was the subject of exemptions from the need for an Environmental Permit which were in place at the time. It is understood that the deposition of waste at the site commenced in 2009 and had substantially ceased by mid-2015.
- 1.3 On 31 March 2020 planning permission reference 16/01399/HYBR<sup>1</sup> (the planning permission) was granted by Rochdale Borough Council for inter alia:-

*'...the development of land at South Heywood...for the construction of a new link road between Junction 19 of the M62 and Pilsworth Road...a major mixed-use development comprising... employment uses...together with associated landscaping...drainage...cycleway and footpath linkages, infrastructure and other works ancillary thereto...'*

- 1.4 To facilitate the construction of the components of the development the subject of the planning permission within the boundary of the site it is necessary to vary the permit to provide for the revisions to the ground levels compared with those currently the subject of the permit. It is also necessary to increase the permit boundary to provide for the deposit of waste materials in the areas of the site to the north west and south east of the area currently the subject of the permit. These areas are referred to as the north west and south east repositories. The waste which will be deposited in the north west and south east repositories will be placed on top of waste which was deposited historically under the exemptions from the need for an Environmental Permit. Whilst it is necessary to vary the permit to include the north west and south east repositories it is proposed only to permit the newly deposited waste and not the

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<sup>1</sup> Planning permission reference 16/01399/HYBR is the subject of a non-material amendment reference 20/00454/ANM which was issued by Rochdale Borough Council on 27 July 2020. Both the planning permission and the non-material amendment are presented at Appendix ESSD A to the ESSD report.

underlying waste. It is estimated that it will be necessary to deposit approximately 195,600m<sup>3</sup> of inert waste materials in the repositories.

- 1.5** As explained in the Application Report the ground levels in the areas currently the subject of the permit exceed those the subject of the permit and generally exceed the proposed ground levels which will be developed pursuant to the planning permission<sup>2</sup> and some of the waste materials deposited are inconsistent with the waste types which were authorised for deposit. Extensive site investigation works have been carried out at the site and remedial measures have been proposed. In the area of the new link road where it encroaches on the eastern part of the existing permit area the waste materials have been excavated and removed from site consistent with an Operational Management Plan<sup>3</sup> which was agreed with the Environment Agency (EA). An application will be submitted to partially surrender the permit for the area of the link road.
- 1.6** The implementation of the remedial measures for the remaining waste in the area of the site which is the subject of the permit will be the subject of Action Plans and subsequent Operational Management Plans which will be agreed with the EA shortly. In addition to delivering ground levels pursuant to the development at the site the subject of the planning permission, the remedial measures which will be the subject of the Action Plans will remediate the remaining waste at the site such that it is consistent with the definition of inert waste specified in Section 2.1.2 of the Annex to the Council Decision of 19 December 2002 establishing criteria and procedures for the acceptance of waste at landfills pursuant to Article 16 of and Annex II to Directive 1999/31/EC<sup>4</sup>. The remediation of the waste at the site will be the subject of a mobile plant Environmental Permit. It is anticipated that it will not be feasible to remediate all of the waste to the appropriate standard and some waste will be removed from site for management at a suitably authorised facility without being treated under the mobile plant Environmental Permit.

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<sup>2</sup> Note that the general cut and fill balance at the site is cut within the area the subject of the current permit and fill within the repositories outside the current permit. There are areas of the site where this is not the case to ensure the delivery of the levels shown on Figure ESSD 4A. In these areas the cut and fill balance is the opposite.

<sup>3</sup> Harehill Waste Recovery Site Permit – EPR/CB3738AC Operational Management Plan for the Excavation and Export off Site of excavated waste material from within the Link Road Area. Final rev2 – 19th March 2021. Approved by the Environment Agency on 22 March 2021.

<sup>4</sup> <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32003D0033&from=EN>

- 1.7** It is proposed that the materials which will be deposited in the north west and south east repositories will comprise waste materials excavated from elsewhere on site. The waste materials will be subject to rigorous Waste Deposition Procedures (WDP) to ensure that only inert waste materials are deposited. The waste materials have, in effect, already been accepted at the site although they will be subject, as necessary, to remediation such that they are inert. Accordingly, no changes to the waste codes listed in Schedule 2, Table 2.1 of the permit are proposed. In the unlikely event that it is necessary to import additional waste materials to the repositories or the currently permitted site to facilitate construction of the development platform the imported wastes will also comprise inert waste materials only and will be subject to the WDP.
- 1.8** This document comprises a nuisance and amenity environmental risk assessment (ERA) prepared to support the variation application based on the risk screening matrix provided in Table ERA 1 and the assessment presented in Table ERA 2. In preparing the ERA it is necessary to recognise that the deposit of waste at the site already has been authorised by the EA and the operations which will be subject to this variation to the permit will not include the remediation of the waste levels or the waste types previously deposited. As explained above the remediation of the waste levels and the waste types previously deposited will be the subject of Action Plans which have been or will be agreed with the EA and do not form part of this variation to the permit. The only activity which is the subject of this ERA is the deposit of inert waste at the site to facilitate the formation of the restored surface or development platform for the employment use.
- 1.9** The ERA considers potential receptors and pathways for impacts based on the understanding of the environment surrounding the site that is presented in the Environmental Setting and Site Design (ESSD) presented at Appendix B to the Application Report and in particular Figures ESSD 1 and ESSD 2A of the ESSD. The assessment of the risks associated with the deposit of inert waste at the site is based on the information on the design and operation of the site described in the ESSD and the general principles of EA guidance “Risk assessments for your environmental permit” published on the GOV.UK website on 1 February 2016. The ERA takes into consideration receptors within 500m of the site with the exception of statutorily designated nature conservation sites for which the relevant distance is up to 2km.

- 1.10** As explained in the ESSD, based on information from the Defra MAGIC website there are no Sites of Special Scientific Interest (SSSI), Special Protection Areas (SPA), Special Areas of Conservation (SACs) or National Nature Reserves (NNRs) located within 2km of the site. Hopwood Woods Local Nature Reserve (LNR) is located approximately 1.8km south east of the site. It is understood that Hopwood Woods comprises several areas of woodland, including ancient and seminatural woodland and a pond which supports breeding toads. There are no non-statutory designated sites of nature conservation interest located within 500m of the site.

## 2. Conclusions

- 2.1 The ERA presented in Table ERA 2 that has been completed to support the permit variation application demonstrates that the proposed deposit of waste as a recovery activity has a low or very low risk of adverse impact on the surrounding environment. The deposit of inert waste in the currently permitted area and in the north west and south east repositories is consistent with the principles of the deposition of waste materials at the site pursuant to the registration of exemptions from the need for an Environmental Permit and the issue of the permit for the site.

**TABLES**



Table ERA 1 Risk screening matrix (deposit of waste on land as a recovery 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			X	X	X	X	X	X					
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													
FARMLAND WITH LIVESTOCK			X	X	X	X	X	X					
FARMLAND ARABLE					X	X	X	X					
PRIORITY HABITAT													
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)													
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.

**Table ERA 2 – Assessment of nuisance and amenity risks associated with the permanent deposit of inert waste at the Hareshill Farm**

What do you do that can harm and what could be harmed?			Assessing the risk			Managing the risk	
Hazard	Receptor	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.						Any material deposited at the site will be inert waste which have a negligible potential to generate odour. Waste deposition procedures (WDP) will be implemented at the site to minimise the risk that unauthorised wastes will be accepted.	Negligible
<b>Noise</b>							
Mobile plant and vehicles associated with waste deposition	Local human population	Air	Medium to low	Nuisance from noise	Medium to low	The potential impacts of noise from the development have been assessed as part of the planning application process and the control of noise is the subject of conditions of the planning permission for the site. Condition 24 of the planning permission states that no development shall take place until a scheme of noise mitigation measures for existing neighbouring residential properties has been submitted to and approved in writing by the Local Planning Authority.	Low

What do you do that can harm and what could be harmed?			Assessing the risk			Managing the risk	
Hazard	Receptor	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?
						Measures will be implemented to minimise the generation of noise from the activities including the use of site plant and vehicles with manufacturer fitted silencers and non-tonal reversing alarms. All site-based plant and vehicles will be the subject of a planned maintenance programme and will be maintained accordingly. The internal haul roads and access road will be inspected on a regular basis and maintained so that potholes are identified and repaired as soon as is reasonably practicable. In the unlikely event that noise becomes an issue in respect of the permitted operations at the site a noise management plan will be prepared and implemented. There is no history associated with an unacceptable impact of noise from the operations at the site and although the permitted area will be increased the overall Hareshill Site where waste has previously been deposited will not. The deposit of inert waste in the currently permitted area and in the north west and south east repositories is consistent with the principles of the deposition of waste materials at the site pursuant to the registration of exemptions from the need for an Environmental Permit and the issue of the permit for the site.	
<b>Vibration</b>							
Mobile plant and vehicles associated	Local human population	Ground	Low	Nuisance from vibration	Medium to low	Potential sources of vibration will be limited to site-based activities only. It is considered that these are	Low

What do you do that can harm and what could be harmed?			Assessing the risk			Managing the risk	
Hazard	Receptor	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?
with waste deposition,						more likely to be associated with ground borne vibration rather than transmissions of vibration through the air. Based on the nature of the proposed activities it is considered unlikely that ground borne vibration will have a significant effect on potential receptors within the vicinity of the site. In the unlikely event that vibration becomes an issue in respect of the permitted operations at the site a vibration management plan will be prepared and implemented. There is no history associated with an unacceptable impact of vibration from the operations at the site and although the permitted area will be increased the overall Hareshill Site where waste has previously been deposited will not. The deposit of inert waste in the currently permitted area and in the north west and south east repositories is consistent with the principles of the deposition of waste materials at the site pursuant to the registration of exemptions from the need for an Environmental Permit and the issue of the permit for the site.	
<b>Fugitive emissions</b>							
Particulates from access routes, waste delivery, and waste deposition	Local human population / industrial and residential premises /	Air	Low	Deposition of particulate mater	Medium to low	All site operations will be undertaken in accordance with a Dust Emissions Management Plan (DEMP). A maximum site speed limit of 10mph will be set for vehicles using the site. If wastes are delivered to the site the vehicles will be transported in enclosed,	Low to very low

What do you do that can harm and what could be harmed?			Assessing the risk			Managing the risk	
Hazard	Receptor	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?
	farmland / public highway / public footpaths					<p>sheeted or netted vehicles. Surfaced roads will be swept to ensure they remain free from dust generating materials, in addition to the water spraying of site roads during dry conditions. During periods of dry weather, the operational area and the site roads will be sprayed with water as necessary to minimise particulate matter emission. Site operations may be temporarily halted during exceptionally dry and/or windy conditions.</p> <p>There is no history associated with an unacceptable impact of dust from the operations at the site and although the permitted area will be increased the overall Hareshill Site where waste has previously been deposited will not. The deposit of inert waste in the currently permitted area and in the north west and south east repositories is consistent with the principles of the deposition of waste materials at the site pursuant to the registration of exemptions from the need for an Environmental Permit and the issue of the permit for the site.</p>	
Windblown litter	Local human population	Air and land	Low	Nuisance and loss of amenity	Very low	The inert wastes which will be deposited at the site will have a very low potential to generate litter.	Very low
Scavenging animals and birds	Local human population	Air and land	Low	Nuisance and loss of amenity	Very low	The inert wastes which will be deposited at the site will have a very low potential to attract scavenging animals and scavenging birds.	Very low

What do you do that can harm and what could be harmed?			Assessing the risk			Managing the risk	
Hazard	Receptor	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?
Pests (e.g., flies)	Local human population	Air and land	Low	Nuisance and loss of amenity	Very low	The inert wastes which will be deposited at the site will have a very low potential to attract pests such as flies.	Very low
Mud and debris deposited on the public highway	Public highway	Vehicle movements	Low	Mud on the public highway	Low	An easy to clean surface of hard standing will be provided for vehicles associated with waste activities entering and leaving the site. Mechanical road sweepers will be used to remove any mud or debris on the public roads in the vicinity of the site. All vehicles must stop and check for debris between their wheels prior to leaving the site. Visual monitoring will be undertaken regularly each day by the site manager. The deposit of inert waste in the currently permitted area and in the north west and south east repositories is consistent with the principles of the deposition of waste materials at the site pursuant to the registration of exemptions from the need for an Environmental Permit and the issue of the permit for the site.	Low
<b>Accidents</b>							

What do you do that can harm and what could be harmed?			Assessing the risk			Managing the risk	
Hazard	Receptor	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 stored and waste deposited on site	Local human population gaining unauthorised access to the waste operation	Direct physical contact	Low	Bodily injury	Medium	The inert waste types that will be deposited at the site should not cause harm to human health by virtue of their composition. Security measures will be implemented comprising the use of fencing, safety signs and regular inspections to minimise the potential for unauthorised entry to the site. The deposit of inert waste in the currently permitted area and in the north west and south east repositories is consistent with the principles of the deposition of waste materials at the site pursuant to the registration of exemptions from the need for an Environmental Permit and the issue of the permit for the site.	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 comprising the use of fencing, safety signs and regular inspections to minimise the potential for unauthorised entry to the site. Vehicles will employ suitable non-tonal reversing alarms.	Low
Accidental release of fuel, spillage of liquids and leakages	Groundwater, Water resources	Infiltration, run-off	Low	Contamination of water resources	Medium	Company operational, maintenance, inspection and accident management procedures will be in place and will be implemented. All re-fuelling of site vehicles will be carried out using an approved mobile fuel bowser with a suitable pump and hose or static bowser. Absorbent material (spill kits) will be available on site and will be deployed to contain drips and small spillages. Site staff will be trained in their use. All other fuels, oils and potential	Low



What do you do that can harm and what could be harmed?			Assessing the risk			Managing the risk	
Hazard	Receptor	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?
						contaminants will be stored within a site compound in secure, fit for purpose containers within bunded containment as appropriate.	
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 on the GOV.UK Flood map for planning website ( <a href="https://flood-map-for-planning.service.gov.uk/">https://flood-map-for-planning.service.gov.uk/</a> ) the entirety of the Harehill Farm site is located in Flood Zone 1 which is defined as land having less than 1 in 1000 annual probability of river flooding.	Low
Fire	Atmospheric emissions	Air	Very low	Nuisance from smoke and odour Contamination of water resources	Very low	As all the waste materials which will be deposited 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
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	There are no European sites or Sites of Special Scientific Interest within 2km of the site.	Negligible
Waste operations may cause harm to and deterioration of nature conservation sites.	Wildlife sites of regional or local importance	Air or run off	Very Low	Harm to protected site through toxic contamination, nutrient enrichment,	Very Low	There are no non-statutory designated sites of nature conservation interest located within 500m of the site. Hopwood Woods Local Nature Reserve (LNR) is located approximately 1.8km south east of the site. Measures will be in place to minimise the	Negligible

What do you do that can harm and what could be harmed?			Assessing the risk			Managing the risk	
Hazard	Receptor	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?
	and protected habitat			smothering, disturbance, predation etc.		risk of unacceptable impacts from the site operations on the surrounding environment which will be protective also of local nature conservation and habitat features.	
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	There are no heritage conservation sites or listed buildings within 500m of the perimeter of the site.	Negligible