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Environmental Risk Assessment

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SITE DETAILS

Murfitts Industries Limited,

Fourth Avenue,

Letchworth Garden City,

Hertfordshire,

SG6 2TT

OPERATOR DETAILS

Murfitts Industries Limited,

Avenue One,

Letchworth Garden City,

SH6 2HU

PERMIT REFERENCE

EPR/VP3722SV

DOCUMENT REFERENCE

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K18.16~20~002	Sensitive Receptors 1km	22/12/2023
K18.16~20~003	Site Setting Plan 2km	04/06/2024
K18.16~20~004	Site Layout Plan	02/09/2024
K18.16~20~005	FRS Access Route Plan	22/12/2023

APPENDICES

1. INTRODUCTION

This document is the Environmental Risk Assessment (ERA) that accompanies the application for an Environmental Permit Variation at Fourth Avenue, Letchworth Garden City, Hertfordshire, SG6 2TT.

The application has been prepared by Wiser Environment Limited on behalf of the applicant Murfitts Industries Limited. The ERA has been produced in line with Environment Agency guidance, 'Risk assessments for your environmental permit'[1].

This ERA identifies potential environmental risks and proposes mitigating measures that can reduce adverse impacts and should be read in conjunction with the other supporting document included within the application.

1.1. Scope

This risk assessment is based on the source-pathway-receptor approach. All potential sources of pollution associated with waste acceptance, storage and treatment for recovery activities have been assessed against the principal receptor types identified within the site's vicinity.

The requirement for risk management measures is then dependent on a viable pathway being present between the source and the receptor. Where such pathway exists, management measures are required to reduce risk.

1.2. Aims

This assessment aims to consider potential environmental hazards associated with the activity, to identify sensitive receptors which these may impact, and determine the influence management practice has on reducing risk.

[1] Risk assessments for your environmental permit - GOV.UK (www.gov.uk), updated 21 November 2023

2. SITE SETTING

2.1. Location

The proposed site is located in an established industrial area on Fourth Avenue (Jubilee Trading Estate) (see Figure 1 below) bordered by other established industrial and commercial activities. The closest residential area is located approximately 400m NNW.

The A1 (M) is approximately 600 m east of the site, whilst the centre of Letchworth is approximately 1.7km South-West of site.

Figure 1 *Aerial image of the site, showing the permit boundary in green*

2.2. Humans and Property

The nearest residential area (ID1) is approximately 400m North-North East of the permit boundary, shown on the Sensitive Receptor Plan (K18.16~20~002). The main residential areas within 2km of the permit boundary include Norton, Baldock and Letchworth.

2.3. Environmentally Sensitive Sites

Environmentally sensitive sites include;

Sites of Special Scientific Interest (SSSI); Special Areas of Conservation (SAC); Special Protection Areas (SPA); RAMSAR sites; National Nature Reserves (NNR); Ancient Woodlands (AW); Local Nature Reserves (LNR): County Wildlife Sites (CWS); World Heritage Sites; Areas of Outstanding Natural Beauty (AONB); National Parks; and Biodiversity Action Plan (BAP) priority habitats.

2.3.1. Designated Environmental Receptors

Table 1 Designated Sites (within 2km)

ID	DESCRIPTION	NEAREST LOCATION FROM SITE (APPROX.)	DIRECTION FROM SITE
1	Local Nature Reserve – Norton Common	1165 m	W
2	Local Nature Reserve – Ivel Springs	1270 m	NNE
3	Local Nature Reserve – Weston Hill	1550 m	ESE

2.3.2. Non-Statutory Designated Receptors

A series of non-statutory designated environmental sites are located within 2km of the permit boundary; Table 2 below summarises those within 1km of the site. The full list is included within the Sensitive Receptors Table. The locations relative to the permit boundary are also shown on the Site Setting Plan (K18.16~20~003) with IDs that correspond to the Receptors Table (ERA2) in Section 3.2.

Table 2 Non-Statutory Designated Sites (within 2km)

ID	DESCRIPTION	NEAREST LOCATION FROM SITE (APPROX.)	DIRECTION FROM SITE
1	BAP – Traditional Orchard	580 m	NNW
2	BAP – Deciduous Woodland	640 m	NE
3	BAP – Traditional Orchard	870 m	SSW
4	BAP – Deciduous Woodland	875 m	SSW
5	BAP – Deciduous Woodland	880 m	SE
6	BAP – Traditional Orchard & Good Quality Semi-Improved Grassland	1140 m	NNW
7	BAP – Deciduous Woodland (Broadleaved)	1175 m	WSW
8	BAP – Good Quality Semi-Improved Grassland	1270 m	N
9	BAP – Deciduous Woodland and Lowland Meadows	1410 m	NE
10	BAP – Deciduous Woodland & Wood Pasture and Parkland	1560 m	WSW
11	BAP – Deciduous Woodland	1670 m	SSE
12	BAP – Good Quality Semi-Improved Grassland	1830 m	N
13	BAP – Deciduous Woodland	1870 m	NNE

2.4. Geology

2.4.1. Artificial Ground and Made Ground

The site is located in an area designated as Landscaped ground (Undivided). The site was formerly identified as Metal Works from the year 1921, continuing to remain on site until the late 1900's, with warehousing erected in the adjacent surrounding area.

2.4.2. Superficial and Drift Geology

Underlying the impermeable site surface are superficial geological deposits known as 'drift', these are the youngest geological deposits, formed during the Quaternary. They rest on older deposits or rocks referred to as bedrock.

The superficial geological deposits below have not been identified within Appendix A, however Lowestoft Formation (Diamicton) have been identified approximately 225m South West of the site, and Glaciofluvial Deposits, Mid Pleistocene (Sand and Gravel), have been identified approximately 250m South West of the site.

2.4.3. Bedrock and Solid Geology

Bedrock geology is the main mass of rocks underlying the Superficial deposits, forming the Earth and is present everywhere, whether exposed at the surface in outcrops or concealed beneath superficial deposits or water. There is evidence of Holywell Nodular Chalk Formation and New Pit Chalk Formation (Undifferentiated) being the predominant bedrock formation underlying site and was formed in the Cenomanian Age.

2.5. Hydrogeology

The Superficial Aquifer is the status of groundwater held within superficial geology. There are no records of a Superficial Aquifer identified on site. The closest Superficial Aquifer identified to be present around the site is located approximately 225m South West of the site is Secondary Undifferentiated (assigned where it is not possible to attribute either category A or B to a rock type. In general, these layers have previously been designated as both minor and non-aquifer in different locations due to the variable characteristics of the rock type).

The Bedrock Aquifer is the status of groundwater held within bedrock geology. There is a Principal Aquifer below the site, which are described as geology of high intergranular and/or fracture permeability, usually providing a high level of water storage and may support water supply/river base flow on a strategic scale. Generally principal aquifers were previously major aquifers.

2.6. Hydrology

Table 3 Surface Water Features

DESCRIPTION	NEAREST LOCATION FROM SITE (APPROX.)	DIRECTION FROM SITE
Onsite Lagoon – Western Lake	120 m	WSW
River Ivel	1445 m	NNE
Pix Brook	1460 m	WNW
Pond Associated with Nortonbury Cottages	1790 m	N

2.7. Flood Risk

2.7.1. Risk of Flooding from Rivers and Sea

The UK Government Flood Risk Check[2] states that there is a Very Low Risk of flooding from Rivers and the Sea on site.

2.7.2. Surface Water Flooding

The UK Government Flood Risk Check states that there is a Low Risk of Surface Water flooding at the site. As identified within Appendix A, the highest risk on site is identified as 1 in 1000 year, between 0.3m – 1.0m.

2.7.3. Groundwater Flooding

The UK Government website to check flood risk states that flooding from groundwater is unlikely in this area. The Environmental Report (Appendix A) identified the highest risk within 50m of the site as Negligible.

2.8. Air Quality

The proposed site is not situated within an Air Quality Management Area.

2.9. Nature of Risk Assessment

This document provides a broad and general assessment of the risk factors considered to be of significance for the site, and an evaluation of the impact from the principal risk factors to receptors within the site vicinity.

[2] Check the long term flood risk for an area in England - GOV.UK (www.gov.uk)

3. METHODOLOGY

3.1. Hazard Identification

A hazard is something with potential to cause harm to something else. Table ERA1 below identifies the principal hazard types which may be associated with the proposed activity; and indicates where hazards are identified and determined to be of significant potential risk to determine further assessment. Potential hazards from this activity are as follows:

ERA1 Identified Hazard Types

PRINCIPAL HAZARD TYPE	SUB-HAZARD TYPE	POTENTIAL SOURCE	RISK	REQUIRES FURTHER ASSESSMENT
Odour	N/A	• Waste Delivery • Storage • Treatment Process • Material Dispatch	• Some non-conforming waste could be delivered.	✓ ERA 8 below
Point Source Emissions to Air	None	• None	• None	N/A
Fugitive Emissions to Air	Dust and Particulate Matter	• Waste Delivery • Treatment Process • Material Dispatch	• Deposit of EoL tyres on site. • Loading of EoLT onto trailer for dispatch.	✓ ERA 8 below
	Litter and Debris	• Waste Delivery • Treatment Process • Material Dispatch	• Loss of material during unloading, treatment, and dispatch of waste.	✓ ERA 9 below
Fugitive Emissions – Pests	Pests, vermin, scavengers	• Storage	• Some non-conforming waste could be delivered.	✓ ERA 10 below
Fugitive Emissions – Mud and Debris	Mud & debris	• Waste Delivery • Treatment Process • Material Dispatch	• Some non-conforming waste could be delivered. • Mud tracked into/out of site by vehicles.	✓ ERA 11 below
Fugitive Emissions – to Water	Contaminated runoff	• Run off from stored waste pre-treatment • Run off from stored waste post treatment • Surface water run off • Fire waters	• Waste will be stored within an area with an impermeable site surface. • Waste post treatment stored on an impermeable site surface, surfaced by an interceptor. • All hazardous liquids will be stored in appropriate containers with secondary containment. • Localised secondary containment will be provided for potential fire water in the event of a fire. • Waste processing occurs externally.	✓ ERA 12 below
Accidents	Transferring substances	• Waste Delivery • Treatment Process	• Loss of waste from vehicle. • Spillages from processing equipment.	✓ ERA 13 below

PRINCIPAL HAZARD TYPE	SUB-HAZARD TYPE	POTENTIAL SOURCE	RISK	REQUIRES FURTHER ASSESSMENT
	Plant or equipment failure	• Waste Delivery • Failure of Tanks	• Spillages from vehicles bringing waste to site. • Leakages from waste fuel/oil tanks.	
	Flooding	• Flood risk from rivers or the sea • Surface Water Flooding	• Very Low Risk • Low Risk	
	Vandalism	• Unauthorised Access	• Damage to critical elements of process or storage containment or vehicles.	
	Fire	• Stored Waste • Mobile Plant/Process Equipment	• Uncontrolled emissions or smoke and fire water.	
Noise and Vibration	Transferring substance	• Mobile Plant / Deliveries	• Uncontrolled emissions of noise to surrounding commercial and residential receptors.	✓ ERA 14 below
Climate Change	Extreme maximum & minimum temperature Extreme rainfall Drier summers River flow Sea level rise	• Stored Waste • Mobile Plant / Process Equipment • Flood Risk from rivers or the sea • Surface Water Flooding	• Uncontrolled emissions or smoke and fire water. • Potential for increased waste reactions or fires involving heat sensitive or combustible waste. • Increased dust emissions from processing areas, stockpiled material and site roads. Reduced availability of water for dust suppression. • Long periods of hot and dry weather leads to drought, and significant impact on water supplies.	✓ ERA 15 below

3.2. Receptors

A receptor is the object (e.g., person, organism, resource, or property) impacted by a hazard. For example, odour may cause offence to a human (the receptor). When identifying receptors which may be at risk from the site, the following have been considered:

- Ancient woods
- Locations used to grow food or to farm animals or fish
- Drain and sewer systems
- Factories and other businesses
- Fields and allotments used to grow food
- Footpaths
- Roads and railways

- Groundwater beneath the site
- Homes, or groups of homes
- Playing fields and playgrounds
- Private drinking water supplies
- Regionally important geological sites
- Schools, hospitals, and other public buildings
- Water
- Conservation and habitats protected areas and areas of scientific interest

Sensitive receptors within 2 km of the permit boundary are shown on the Site Setting Plan (K18.16~20~003). The IDs on the Site Setting Plan correspond to the Receptors Table (ERA2) below.

ERA2 Receptors

RECEPTOR TYPE	ID	DESCRIPTION	DISTANCE	DIRECTION
HUMANS AND PROPERTY	-	Site Workers	On site	-
	-	Site Visitors	On site	-
		INHABITANTS OF RESIDENTIAL PROPERTIES		
	1	South Norton Residential Area	420 m	NW
	2	Hadrian Way Residential Area	470 m	ENE
	3	West Baldock Residential Area	475 m	NE
	4	Broughton Hill Residential Area	500 m	SW
	5	Chilvers Bank Residential Area	705 m	E
	6	Quinn Way Residential Area	770 m	SSW
	7	Letchworth Gate Residential Area	1045 m	SSW
	8	The Rowans Residential Area	1105 m	E
	9	Icknield Way Residential Area	1160 m	W
	10	Southfields Residential Area	1250 m	WNW
	11	Norton Way S Residential Area	1350 m	SW
	12	Northfields Residential Area	1450 m	NW
	13	London Road Residential Area	1470 m	E
	14	Royston Road Residential Area	1640 m	NE
		SENSITIVE PUBLIC USE		
	1	Icknield Way	510 m	NE
	2	Brandles School & Knights Templar Sports Centre	695 m	ENE
	3	St Marys Junior Mixed School & St Marys Infant School	780 m	ESE
	4	Norton Methodist Church	825 m	NW
	5	Garden House Hospice Care	905 m	SW
	6	Woolgrove School	910 m	SSE
	7	Garden City Academy	965 m	S
	8	Baldock Cemetery	965 m	NE
	9	Weston Way Nursery School	1050 m	ESE
	10	The Knights Templar School & Christchurch Baldock	1055 m	ENE
	11	St George's Church	1085 m	WNW
	12	Magic Moments PreSchool	1085 m	E
	13	St Nicholas Primary School & Church	1135 m	N
	14	Birch Pharmacy & Education Facility	1190 m	W
	15	Letchworth Free Church	1315 m	WSW
	16	Pixmore Junior School	1345 m	SW
	17	Baldock Manor Hospital	1380 m	E
	18	Central Methodist Church	1440 m	WSW
	19	Baldock Methodist Church	1455 m	NE
	20	Holy Trinity & St Augustine of Canterbury	1510 m	E

RECEPTOR TYPE	ID	DESCRIPTION	DISTANCE	DIRECTION
	21	Letchworth Local Post Office & Grange Baptist Church	1575 m	NW
	22	Letchworth Police Station, Education Facility & Sea Cadets Training	1580 m	W
	23	St John's Primary School	1640 m	E
	24	The Grange Academy & Northfields Infants & Nursery School	1700 m	NNW
	COMMERCIAL USE			
	1	Jubilee Industrial Centre	0 m	Onsite
	2	Blackhorse Road Industrial Area	370 m	N
	3	Shaftesbury Industrial Centre	575 m	NW
	4	Wissen Drive Commercial Area	620 m	WSW
	5	Baldock Industrial Estate	1145 m	E
	6	Three Horseshoes Norton Rd	1215 m	N
	7	Letchworth Garden City Industrial Estate	1260 m	WSW
	8	Icknield Way Industrial Estate	1270 m	NW
	9	Bikerdikes Garden Centre Norton Rd	1370 m	N
	10	Baldock Commercial Businesses	1595 m	NE
	RECREATIONAL AREAS			
	1	North Hertfordshire Leisure Centre	450 m	SSW
	2	Pascal Way Recreation Ground	475 m	NW
	3	Avenue Park Baldock	890 m	NE
	4	Norton Common Swimming Pool and Willian Bowls Club	1170 m	W
	5	Jackmans Creamery	1545 m	S
	6	Letchworth Cricket Club & Hitchen and Letchworth Weightlifting Club	1765 m	SSW
	AGRICULTURAL			
	1	Norton Allotments	740 m	N
	2	Woolgrove Allotments	970 m	SSE
	3	Laymoor Farm	1885 m	NE
	4	BALGA Clothall Rd Site	1935 m	ENE
	CRITICAL INFRASTRUCTURE			
	1	UK Power Networks – Electric Utility Company	365 m	ESE
	2	GTR Railway Depot (Letchworth)	670 m	WNW
	3	Baldock & Letchworth Fire Station	990 m	ENE
	4	Letchworth Garden City Train Station	1540 m	W
	5	Baldock Station	1645 m	NE
	ROADS AND RAILWAYS			
	-	Avenue One	150 m	WSW
	-	Works Road	200 m	NNW
	-	B656	300 m	SE
	-	A1 (M)	600 m	E

RECEPTOR TYPE	ID	DESCRIPTION	DISTANCE	DIRECTION
	PUBLIC RIGHTS OF WAY			
	-	Brick Lane Footpath	290 m	ESE
	-	Icknield Way	505 m	NE
	-	Baldock Lane Route	710 m	SE
WATER	**SURFACE WATER**			
	-	Onsite Lagoon – Western Lake	120 m	WSW
	-	River Ivel	1445 m	NNE
	-	Pix Brook	1460 m	WNW
	-	Pond Associated with Nortonbury Cottages	1790 m	N
	GROUNDWATER			
	-	Superficial Aquifer – Secondary Undifferentiated	230 m	SW
	-	Bedrock Aquifer – Principal Aquifer	Underlying site	-
ENVIRONM-ENTALLY SENSITIVE SITES	**DESIGNATED SITES**			
	1	Local Nature Reserve – Norton Common	1165 m	W
	2	Local Nature Reserve – Ivel Springs	1270 m	NNE
	3	Local Nature Reserve – Weston Hill	1550 m	ESE
	NON-STATUTORY DESIGNATED SITES			
	1	BAP – Traditional Orchard	580 m	NNW
	2	BAP – Deciduous Woodland	640 m	NE
	3	BAP – Traditional Orchard	870 m	SSW
	4	BAP – Deciduous Woodland	875 m	SSW
	5	BAP – Deciduous Woodland	880 m	SE
	6	BAP – Traditional Orchard & Good Quality Semi-Improved Grassland	1140 m	NNW
	7	BAP – Deciduous Woodland	1175 m	WSW
	8	BAP – Good Quality Semi-Improved Grassland	1270 m	N
	9	BAP – Deciduous Woodland & Lowland Meadows	1410 m	NE
	10	BAP – Deciduous Woodland & Wood Pasture and Parkland	1560 m	WSW
	11	BAP – Deciduous Woodland	1670 m	SSE
	12	BAP – Good Quality Semi-Improved Grassland	1830 m	N
	13	BAP – Deciduous Woodland	1870 m	NNE
HERITAGE SITES	**LISTED BUILDINGS, PARKS & SCHEDULED MONUMNETS**			
	1	3 Listed Buildings – Grade II	775 m	WSW
	2	Cluster of Listed Buildings – Grade II	1175 m	NNW
	3	Cluster of Listed Buildings in Baldock Town – Grade II	1370 m	NE
	4	6 Listed Buildings – Grade II	1375 m	W
	5	Cluster of Listed Buildings in Letchworth – Grade II	1420 m	SW
	6	8 Listed Buildings – Grade II	1425 m	WNW

RECEPTOR TYPE	ID	DESCRIPTION	DISTANCE	DIRECTION
	7	Scheduled Monument – Romano-British Small Town and Late Iron Age Settlement at Baldock	1480 m	ENE
	8	2 Listed Buildings – Grade II	1850 m	NNE

3.3. Prevailing Wind Direction

The closest observing station where weather data is available is Saffron Walden. Figure 1 below illustrates the prevailing wind direction of South West, which would transport any windblown emissions North East from the site.

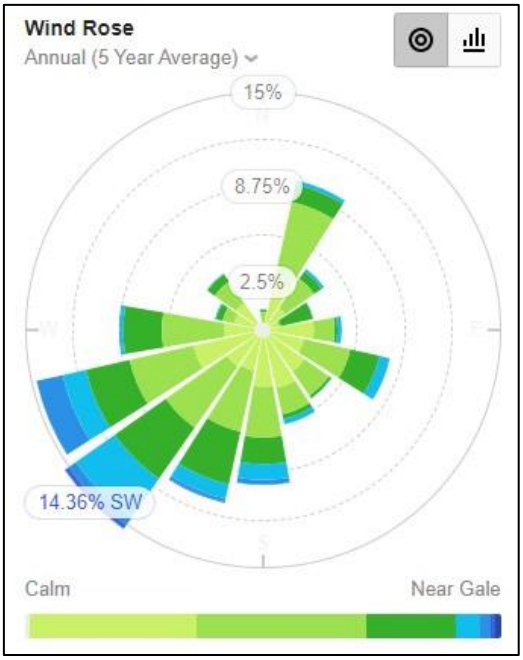

Figure 2 Saffron Walden wind rose *(willyweather.co.uk).*

3.4. Pathways

The pathway is the means by which the hazard reaches the receptor and forms the link between the two. For example, a dust hazard may reach a receptor by travelling through air, with the air therefore being the pathway.

The source-pathway-receptor link must be present for there to be a risk. Management measures applied at the site act to minimise the overall risk by impeding or removing the pathway.

ERA3 Pathways

RECEPTOR	HAZARD	PATHWAY
Humans and Property	Odour	Transmitted through the air
	Dust and Particulate Matter	Transmitted through the air
	Noise	Transmitted through the air
	Birds, Vermin & Insects	Physical travel
	Fire	Physical contact and spread
Groundwater	Contaminated runoff	Infiltration through the ground
Surface Water	Contaminated runoff	Direct discharge from site

RECEPTOR	HAZARD	PATHWAY
Environmentally Sensitive Sites	Dust and Particulate Matter	Transmitted through the air
	Noise	Transmitted through the air
	Fire	Physical contact and spread
Atmosphere	Dust and Particulate Matter	Transmitted through the air

3.5. Risk

Assessment of risk is based on the probability of receptor exposure to the identified hazards and the consequences of such exposure. The initial assessment of risk is made assuming no risk management practices are applied.

A matrix is used to determine overall risk and uses the following definitions:

ERA4 Probability of Exposure

PROBABILITY OF EXPOSURE
HIGH – *exposure is probable:* direct exposure likely with no / few barriers between hazard, source and receptor.
MEDIUM – *exposure is fairly probable*: feasible exposure possible, barriers to exposure less controllable.
LOW – *exposure is unlikely*: several barriers exist between hazards source and receptors to mitigate against exposure.
VERY LOW – *exposure is very unlikely*; effective, multiple barriers in place to mitigate against exposure.

ERA5 Consequences of Exposure

CONSEQUENCES OF EXPOSURE
HIGH – *the consequences are severe:* sufficient evidence that short or long term exposure may result in serious damage.
MEDIUM – *consequences are significant;* sufficient evidence that exposure to hazard may result in damage that is not severe in nature and reversible once exposure ceases (e.g. irritant).
LOW – *consequences are minor;* damage not apparent though reversible adverse changes may occur.
VERY LOW – *consequences are negligible;* no evidence of adverse changes following exposure.

Comparison between probability and consequence provides the overall risk which is reached as follows:

ERA6 Assessing Overall Risk

		CONSEQUENCES			
		Very Low	**Low**	**Medium**	**High**
LIKELIHOOD	**High**	Low	Medium	High	High
	Medium	Low	Medium	Medium	High
	Low	Low	Low	Medium	Medium
	Very Low	Very Low	Low	Low	Low

3.6. Risk Management

Risk management practices for the key hazards identified above are summarised in Section 4 of this ERA. The information presented below is supported by various documents and this is clearly indicated within each table presented. In addition, risk management measures have been developed with reference to relevant guidance documents, the following being of particular note:

- Environmental Management – Guidance: Risk assessment for your environmental permit[3]
- Guidance: Noise and vibration management: environmental permits[4]
- Guidance: Control and monitor emissions for your environmental permit[5]
- Sector Guidance Note S5.06: Recovery and disposal of hazardous and non-hazardous waste.[6]

This risk assessment details the key management measures for identified risks.

3.7. Residual Risk

The application of management practice results in a residual risk which is detailed in Section 4 of this document.

[3] Risk assessments for your environmental permit - GOV.UK (www.gov.uk), Updated 21 November 2023
[4] Noise and vibration management: environmental permits - GOV.UK (www.gov.uk), Updated 31 January 2022
[5] Control and monitor emissions for your environmental permit - GOV.UK (www.gov.uk), Updated 24 November 2022
[6] Sector Guidance Note S5.06: recovery and disposal of hazardous and non-hazardous waste - GOV.UK (www.gov.uk), Updated 10 October 2018

4. RISK ASSESSMENT

The key hazards identified for the activity have been subject to a risk assessment against management practice. Each hazard is assessed in a separate table (Appendix A). The information presented is, as appropriate, supported by other documents and these are referenced.

Many of the hazards identified in the tables located in Appendix A relate to 'Environmental Risk Points (ERP)' identified throughout the processes:

ERA7 Environmental Risk Points (ERP)

REFERENCE	PROCESS
ERP1	Material receipt
ERP2	Material storage pending treatment
ERP3	Production processes
ERP4	Material dispatch

5. APPENDICES

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Appendix A

Environmental Risk Assessment Tables

(16/09/2024)

Appendix B

Groundsure Report (GS-6VR-C53-F7A-G2H)

(22/09/2023)

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