



Environmental Risk Assessment

Depothire Ltd

Site 2

Windmill Way East

Ramparts Business Park

Berwick upon Tweed

TD15 1TQ

EPR/KB3304KF/A001

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1.0 Introduction

Depothire Ltd has instructed Olive Compliance Ltd (OLIVE) to prepare an application for a Bespoke Environmental Permit Application under the Environmental Permitting (England and Wales) Regulations 2016.

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

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

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

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

2.0 Site Setting and Receptors

2.1 Site Setting

The site is located at Windmill Way East, Ramparts Business Park, Berwick upon Tweed.

Depot hire Ltd are a well-established facility for the recycling of wastes arising from industrial, commercial and household sources. Wastes are inspected, sorted and segregated into separate fractions then forwarded on for further recovery. Wastes are tipped and sorted within a building with exception of soils and aggregates wastes. All surfaces are impermeable with sealed drainage.

Recovery of soils and stones will also be conducted under a compliant WRAP protocol.

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

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

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

The site is principally bounded by industrial/commercial premises, located in a large established industrial estate. The eastern boundary of the site is a major rail link and then leads to coastal rural features.

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

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

Table 1
Surrounding Land Uses

Boundary	Description
North	Industrial/commercial
East	Coastal/Rural
South	Industrial/commercial
West	Industrial/commercial

Image 1 – Proposed Permitted Area



Other Waste Management Facilities

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

Permitted Sites

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

Table 3 – Permitted Sites

Name	Distance (km)	Address
DEPOTHIRE LTD	0.3	Unit 1 Recycling Centre, North Road, Seaview Business Park, Berwick Upon Tweed, Northumberland, TD15 1UN
SUEZ RECYCLING AND RECOVERY UK LTD	0.1	Berwick Transfer Station & H W R C, North Road Industrial Estate, Berwick Upon Tweed, Northumberland, TD15 1UN

Exemptions

There are currently 10 waste exemption operations registered within 1km of the site are listed below in Table 4. After a review of the registered exemptions there is no posed risk to the activities proposed on site.

Table 4 – Registered exemptions

Name	Address	Registration Type	Distance (km)
depot hire ltd	No address information available	U1	0.1
DEPOTHIRE LIMITED	No address information available	S2	0.1
Northumberland County Council	NORTH ROAD INDUSTRIAL ESTATE, BERWICK-UPON-TWEED, TD15 1UN	S2	0.2
d	No address information available	S2	0.2

Name	Address	Registration Type	Distance (km)
depothire ltd	No address information available	U1	0.2
depothire ltd	No address information available	S2	0.2
depothire ltd	No address information available	S2	0.2
DEPOTHIRE LIMITED	No address information available	T9	0.2
REDDEM LTD	UNIT 7, KINGS MOUNT, RAMPARTS BUSINESS PARK, BERWICK-UPON-TWEED, TD15 1TQ	S2	0.2

Waste Carriers

The company is a registered waste carrier. Registration number CBDU103547 refers and expires in April 2025.

Sensitive receptors

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

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

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

European/International Sites

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

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

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

Major Roads and Transport Links

The A1 runs approximately 350m west of the site.

Rail links within 2m of the site boundary.

Water courses

The North Sea is located approximately 200 meters east of the site.

Flood Risk Zone

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

2.1.1 Geology, Hydrogeology & Hydrology

Geology

The British Geological Survey (BGS) identifies the site to be located upon natural superficial deposits of Till, Devensian - Diamicton. Sedimentary superficial deposit formed between 116 and 11.8 thousand years ago during the Quaternary period.

The British Geological Survey (BGS) identifies the site to be located upon a bedrock of Tyne Limestone Formation and Alston Formation - Limestone, sandstone, siltstone and mudstone. Sedimentary bedrock formed between 343 and 329 million years ago during the Carboniferous period.

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

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

2.2 Receptors

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

² www.magic.gov.uk accessed November 2021

Table 5 – Sensitive Receptors

Receptor	Distance	Receptor Assessment
North Sea	250m East	<ul style="list-style-type: none"> • Due to the proximity of site, there is a low risk of impact from site activities. • All HCI wastes are accepted treated, and stored in a building. • Surface water drainage systems are in place, runoff will be controlled via sewage system.
A1 – Transport Link	350m West	<ul style="list-style-type: none"> • Due to the proximity of site, there is a low medium of impact from site activities. • All HCI wastes are accepted treated, and stored in a building. • In the event of fire, it could be difficult to drive in due to short-term poor visibility from smoke and damage to vehicles from ash, which could result in short-term commercial impact and traffic / travel disruption.
Rail Links	2m East	<ul style="list-style-type: none"> • Due to the proximity of site, there is a low medium of impact from site activities. • All HCI wastes are accepted treated, and stored in a building. • In the event of fire, it could be difficult to drive in due to short-term poor visibility from smoke and damage to vehicles from ash, which could result in short-term commercial impact and traffic / travel disruption.
Human Receptor Residential properties on Newfield’s Estate	362m South	<ul style="list-style-type: none"> • Due to the proximity of site, there is a risk of impact from site activities. • Dust, Noise and Fire Controls in place to prevent impact to the neighbouring businesses. • All HCI wastes are accepted treated, and stored in a building.
Morrisons – Leisure Facility	589m South	<ul style="list-style-type: none"> • Due to the proximity of site, there is a low risk of impact from site activities.

		<ul style="list-style-type: none"> • Dust, Noise and Fire Controls in place to prevent impact to the neighbouring businesses. • All HCI wastes are accepted treated, and stored in a building. • In the event of fire, it could be difficult to drive in due to short-term poor visibility from smoke and damage to vehicles from ash, which could result in short-term commercial impact and traffic disruption.
School	457m South	<ul style="list-style-type: none"> • Due to the proximity of site, there is a low risk of impact from site activities. • Dust, Noise and Fire Controls in place to prevent impact to the neighbouring businesses. • All HCI wastes are accepted treated, and stored in a building.
Sensitive Receptors	30m East	<ul style="list-style-type: none"> • The location of the woodland and prevailing wind direction means there is a low risk of ash settlement and any potential wildlife habitats. • Due to its location, there is minimal risk of ash settlement and wildlife impact in the event of fire. • Due to the proximity of site, there is a low risk of impact from site activities. • Dust, Noise and Fire Controls in place to prevent impact to the neighbouring businesses. All HCI wastes are accepted treated, and stored in a building.
Commercial Business – Ramparts Industrial Estate	0.1km	<ul style="list-style-type: none"> • The site is located in Ramparts Industrial Estate that have varying industrial and commercial activities, with 2 Permitted Sites and 9 registered waste exemption activities within 1km of the site. • Low risk posed to these businesses from site activities.

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

3.0 Environmental Risk Assessment

3.1 Overview and Approach

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

3.1.1 Identification of Hazards

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

The EA Guidance states that an operator must:

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

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

3.1.2 Identification of Receptors

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

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

Waste activities on site are deemed as low risk as the site is surrounded by commercial activities, conducting various commercial and industrial operations. The site will operate under a robust accredited management system, a working plan and an Environmental Agency approved Fire Prevention Plan. Site activities are monitored daily through checks, with monthly audits to ensure controls are in place and procedures are adhered to. External monitoring is also carried out by independent consultants to monitor amenity risks such as dust and noise.

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

3.1.3 Identification of Potential Pathways

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

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

3.1.4 Assessment of Risks

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

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

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

3.1.5 Controlling Risks

The EA Guidance states:

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

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

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

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

- Odour;

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

Table 3-1 Odour Risk Assessment and Management Plan

What do you do that can harm and what could be harmed			Managing the Risk	Assessing the Risk		
Hazard	Receptor	Pathway	Risk management	Probability of exposure	Consequence	What is the overall risk
What has the potential to cause harm?	What is at risk what do I wish to protect?	How can the hazard get to the receptor?	What measures will you take to reduce the risk? – Who is responsible for what?	How likely is this contact?	What is the harm that can be caused?	What is the risk that still remains? The balance of probability and consequence
Odours from the acceptance , treatment and storage of waste	<i>Site personnel and local human population</i>	Air	<ul style="list-style-type: none"> • No odorous wastes will be accepted at the site. • Waste not typically know to be odorous due to nature of the wood. • Strict waste acceptance procedures will be adhered to, to ensure only permitted wastes are accepted on site. • Stringent pre-acceptance, acceptance and rejection procedures will prevent any malodorous materials from entering site. • All vehicles delivering and collecting materials from the site are covered. • All waste processing operations take place within the enclosed processing building/covered areas. • Storage of waste is for a limited period of time. • Odour is monitored on a daily basis 	Negligible	Odour nuisance and loss of amenity.	Not significant

			<p>during the daily site inspection.</p> <ul style="list-style-type: none">• In the event that odours are detected, investigations will be undertaken to determine the cause and appropriate remedial action taken.• The Site Manager will be responsible for implementing risk management measures.• The facility will not give rise to reasonable cause for annoyance. In the unlikely event of any complaints, these will be dealt with in accordance with the sites complaints procedures.			
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Table 3-2 Noise Risk Assessment and Management Plan

What do you do that can harm and what could be harmed			Managing the Risk	Assessing the Risk		
Hazard	Receptor	Pathway	Risk management	Probability of exposure	Consequence	What is the overall risk
What has the potential to cause harm?	What is at risk what do I wish to protect?	How can the hazard get to the receptor?	What measures will you take to reduce the risk? – Who is responsible for what?	How likely is this contact?	What is the harm that can be caused?	What is the risk that still remains? The balance of probability and consequence
Noise from vehicular movements, waste acceptance and treatment (site access road and yard)	<i>Site personnel and local human population</i>	Air.	<ul style="list-style-type: none"> The site is located within a predominantly industrial setting and as such is not considered unduly sensitive in regard to noise. Wastes are tipped and treated within a building which mitigates against noise from waste activities. Low volumes of soils and stones will be tipped externally in dedicated bays. All potentially noisy plant will be acoustically enclosed and / or fitted with attenuation. Appropriate preventative maintenance will be provided for the various elements of the installation. This will ensure no deterioration of plant or equipment that would give rise to increases in noise. All equipment has been designed in accordance with best practice 	Mobile. Intermittent throughout the day. Medium.	Noise nuisance and loss of amenity.	Not significant

			<p>and to ensure that any noise does not present an issue to the employees at the site under the Control of Noise at Work Regulations, and also to ensure that noise breakout does not lead to noise nuisance at the identified sensitive receptors.</p> <ul style="list-style-type: none"> • Waste treatment operations will only be carried out during operational hours. • All equipment will be maintained and operated in accordance with manufacturer’s guidance and will be maintained in good working order. • The site will be operated so as to minimise noise emissions from the site. Measures that will be taken at the site include: • the avoidance of dropping loads,containers,skips off from height; • the imposition of a speed limit for vehicles delivering waste to the site. This will reduce noise associated with high engine speeds; training of all personnel in the need to minimise site noise. • All personnel are responsible for monitoring and reporting excessive noise when carrying out their everyday roles; • regular maintenance of site surfaces to prevent the 			
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			<p>development of potholes. This will significantly reduce noise generated by vehicles, particularly empty vehicles exiting the site;</p> <ul style="list-style-type: none">• Any noise complaint received will be logged in the site diary. The yard Supervisor will investigate the complaint and will take action to identify the source of the noise and implement remedial measures where appropriate.• The measures employed at the site to minimise the emission of noise will be regularly reviewed by the Site Manager and additional measures will be employed where required.• All vehicles would be fitted with white noise reversing signals rather than the traditional 'beeper' warnings.• The facility will not give rise to reasonable cause for annoyance. In the unlikely event of any complaints, these will be dealt with in accordance with the sites complaints procedures.			
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Table 3-3 Fugitive Emissions Risk Assessment and Management Plan

What do you do that can harm and what could be harmed			Managing the Risk	Assessing the Risk		
Hazard	Receptor	Pathway	Risk management	Probability of exposure	Consequence	What is the overall risk
What has the potential to cause harm?	What is at risk what do I wish to protect?	How can the hazard get to the receptor?	What measures will you take to reduce the risk? – Who is responsible for what?	How likely is this contact?	What is the harm that can be caused?	What is the risk that still remains? The balance of probability and consequence
To Air:						
Dust from: Vehicle movements Waste storage and treatment Dusty wastes Waste deposition Waste surfaces During Dry and Dusty Conditions	<i>Site personnel , local receptors and local human population</i>	Air	<ul style="list-style-type: none"> The site has water suppression controls to reduce the potential of any dust particles to be released to the air during acceptance, treatment and storage of waste accepted externally. There will be no acceptance or treatment of dust or powdered wastes on site. Incoming wastes are inspected and validated prior to acceptance and would be rejected if too dusty <p>Waste Tipping Preventative</p> <ul style="list-style-type: none"> During waste acceptance a 	Medium	Dust nuisance Harm to human health	Not significant

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

			<p>are accepted on site.</p> <ul style="list-style-type: none"> In the event that non-conforming waste is delivered to site, it will be isolated and removed from site at the earliest opportunity. 			
Pests						
Birds, vermin and insects.	<i>Site personnel and local human population</i>	Via air (flies and birds) or over ground (vermin and birds).	<p>Although permitted to accept various waste types, the facility accepts only HCI wastes. Food waste or black bin bag waste is not accepted, these waste would be rejection upon identification. This reduces the risk of pest activity on stie. Waste are collected by company vehicles and are inspected by trained operative before collection and delivery to site. This further reduces the risk of the acceptance of non compliant or putrescible wastes.</p> <p>The company conducts pre- and collection discussions with customer with instructions of permitted wastes and the returns policy – <i>if prohibited items are found when the skip is emptied you are likely to be charged extra and the restricted items returned to customer.</i></p> <p>Strict was acceptance procedures</p>	Negligible	Nuisance, loss of amenity and harm to human health.	Not significant

			<p>implemented.</p> <p>Robust housekeeping procedures detailed in the DEMP and FPP also reduce the risk of pest infestation and easy identification of problems or signs of pest activity.</p> <p>Surfaces used for the storage of waste are to be kept clean with robust housekeeping procedures in place.</p> <p>Staff welfare/office areas are kept clean and free of waste and exposed food.</p> <p>The site is to be monitored daily for any visible signs of rodent or insect activity, such as runways, and the findings logged in the site check sheet.</p> <p>The management of pests is detailed and supported by procedure SOP 3.14 of the EMS.</p>			
Mud/Litter						
Litter from acceptance and storage of waste	<i>Local human population and wildlife.</i>	Airborne litter	<ul style="list-style-type: none"> Due to the nature of the waste to be accepted on site, it is not anticipated that litter will pose a serious risk. However, the boundary of the site and its environs will be regularly visually inspected and any litter cleaned up. The site will benefit from a perimeter 	Low	Nuisance and loss of amenity	Not significant

			<p>fence which will limit the potential for litter to escape off-site.</p> <ul style="list-style-type: none"> • It will be the responsibility of the site staff to monitor the site for any signs of escaping materials either from within the site or from vehicles delivering or removing materials to and from the site. • Inspections will be carried out on a daily basis and a record maintained within the site diary. • The management of litter is detailed further in the WP. 			
Mud on roads	<i>Local human population</i>	Transferral of mud on vehicle wheels	<ul style="list-style-type: none"> • The site is fully surfaced with concrete with concrete access roads. It is therefore not expected that mud will feature as a problem on the site. The following measures will be taken to prevent the deposition or tracking of mud or debris from the site onto public areas or highways: • site surfaces will be maintained free of significant quantities of mud and debris; • all operational areas will be subject to monitoring by staff throughout the working day; 	Low	Mud on road, road traffic accidents.	Not significant

			<p>and</p> <ul style="list-style-type: none"> all vehicles leaving operational areas will, before leaving the site, be checked to ensure that they are clear of loose waste and that any products being exported from the site are secure. In the event that mud, debris or waste arising from the site is deposited onto public areas outside the site, the following remedial measures will be implemented: <ul style="list-style-type: none"> the affected public areas outside the site will be cleaned; and traffic will be isolated from sources of mud and debris within the site to prevent further tracking of mud and debris, and measures will be taken to clear any such sources as soon as practicable. 			
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Table 3-4 Accidents Risk Assessment and Management Plan

What do you do that can harm and what could be harmed			Managing the Risk	Assessing the Risk		
Hazard	Receptor	Pathway	Risk management	Probability of exposure	Consequence	What is the overall risk
What has the potential	What is at risk what do I	How can the	What measures will you take to reduce the	How likely is this	What is the harm	What is the risk

to cause harm?	wish to protect?	hazard get to the receptor?	risk? – Who is responsible for what?	contact?	that can be caused?	that still remains? The balance of probability and consequence
Unauthorised waste	<i>Site personnel and local human population</i> <i>Local environment</i>	Via air (odours and dust) Overland (to sewer, surface water and groundwater)	<ul style="list-style-type: none"> • Upon delivery waste will be subject to strict waste acceptance procedures to identify, reject and/or segregate potentially non-conforming waste. • Only waste authorised by the permit will be accepted at the site. • All wastes will be subject to inspection and checking against the declaration on the waste transfer documentation. • In the event that unauthorised waste is delivered to the site, the waste will be reloaded onto the delivery vehicle for removal from site or will be segregated and stored in a designated quarantine area prior to export from site. • The waste acceptance procedures are included in the EMS. • The Site Manager will be responsible for implementing risk management measures. 	Low	Water contamination Odour and dust nuisance, loss of amenity	Not significant

<p>Fire</p>	<p><i>Site personnel and local human population</i> <i>Local environment</i></p>	<p>Air, water runoff</p>	<p>Due to the nature of the waste activity the risk of Fire could be low. A brief summary of the measures which will be employed is as follows:</p> <ul style="list-style-type: none"> • incompatible materials will not be accepted at the site; • EA approved FPP in place; • fire extinguishers will be provided at designated locations; • smoking will not be permitted in operational areas of the site; • working practices will ensure the assessment of fire hazards and training of employees in fire prevention, e.g. the use of fire extinguishers and emergency procedures; and • no wastes will be burned on the site and any fire at the site will be treated as an emergency. • In the event of a major fire, the following action will be taken: • the Site Manager /Senior and Fire Brigade will be notified immediately and the Environment Agency as soon as practicable; • the burning area will be isolated and attempts will be made to extinguish the fire utilising the 	<p>Low</p>	<p>Nuisance (smoke and fumes) and harm to human health. Water contamination (runoff)</p>	<p>Not significant</p>
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			<p>onsite fire extinguishers, if safe to do so; and</p> <ul style="list-style-type: none"> the site and buildings will be evacuated; all internal drains will be blocked to retain fire water. 			
Spillage and Leakage	<p>Local land quality, surface water and groundwater.</p> <p><i>Site personnel, emergency services personnel and local human population</i></p>	<p>Runoff and percolation through ground.</p> <p>Direct exposure and transport via air</p>	<p>To prevent loss of containment and minimise the risk and impact of releases the following measures will be implemented:</p> <ul style="list-style-type: none"> Containment system: any facilities for the storage of oils, fuels or chemicals will be sited above ground on impervious bases and surrounded by impervious bund walls. The volume of the bunded compound will be at least the equivalent to the capacity of the tank plus 10%. All filling points, vents and gauges will be located within the bund. Storage vessels: storage tanks will be constructed to the appropriate British Standard; Inspection: tanks will be inspected visually on a daily basis by site staff to ensure the continued integrity of the tanks, and identify the requirement for any remedial action; 	Low	<p>Contamination of groundwater and surface water.</p> <p>Harm to human health.</p>	Not significant

			<ul style="list-style-type: none">• Spill kits: materials suitable for absorbing and containing minor spillages will be maintained on site; and• Monitoring techniques: the site staff will undertake daily monitoring for evidence of spillage and leakage.• In the event of any potentially polluting leak or spillage occurring on site, the following action will be taken:• Minor spillages will be cleaned up immediately, using sand or proprietary absorbent. The resultant materials will be placed into containers and will then be removed from site and disposed of at a suitably permitted facility. The incident will be logged in the site diary.• Any dry wastes spilled on site will be quarantined immediately and controlled by the Site Manager. Wastes will be re bagged and stored within the container.• In the event of a major spillage, which is causing or is likely to cause polluting emissions to the environment, immediate action will be taken to contain the			
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			<p>spillage and prevent liquid from entering surface water or drains. The spillage will be cleared immediately and placed in containers for offsite disposal, and the Environment Agency will be informed.</p> <ul style="list-style-type: none"> • The spillage procedure, included in the WP, provides further information with respect to spillages on site. • An emergency spillage management plan will be produced and will be incorporated within the accident management plan. • Wastes stored upon impermeable concrete hardstanding and at distance from any surface water drainage. • There are no significant quantities of chemicals kept onsite and therefore little potential for major spills. • Site procedures will be in place to ensure that spill kit inventories are routinely checked and replacements ordered as required. 			
Security and Vandalism	Personnel on site, emergency service		The following security measures are in place:	Low	Nuisance and harm to human	Not significant

	workers.		<ul style="list-style-type: none"> • Security gates: the site entrance will be locked at all times when the facility is unattended and when the site is not in use; • CCTV is installed around the site with external monitoring by the Operator and the external Security Company. • Authorised access system: all visitors to the site will be required to register in the visitor’s book and sign out again on exit to minimise the risk of unauthorised visitors being present on site; and • Monitoring techniques: operational procedures, including regular inspections, will ensure continual monitoring of security provision at the site. • In the event of a breach of security at the site, the cause will be investigated and appropriate mitigation measures implemented. Records to be maintained include inspections and maintenance of security fencing and gates, breaches of security, investigations and actions taken. 		health. Contamination of land and surface water.	
Flooding	<i>Site personnel and local human population</i>	Overland	<ul style="list-style-type: none"> • There are no surface water features within the 250m site 	Low	Inundation of site with flood water	Not significant

	<i>Local environment</i>		<p>boundary.</p> <ul style="list-style-type: none"> • According to the UK government Flood Map for Planning, the site lies within flood zone 1. This means the site has a very low risk of flooding. • Evacuation procedures will be implemented in the event of flooding. • The Site Manager will be responsible for implementing risk management measures. 			
Litter	<i>Local residents</i>	Windblown/Air	<ul style="list-style-type: none"> • The site access and concrete hardstanding shall be swept as necessary. • All processed waste storage takes place internally. • Vehicles delivering waste to the site / collecting waste are covered. • The site has robust housekeeping measures in place. • Any waste generated by the facility will be disposed of at the appropriate onsite location and subject to the general site waste management plan. • The site shall be inspected daily by the Site Manager and any litter or accumulated debris shall be dealt with immediately. 	Low: Little potential for waste to be generated	Nuisance	Very Low: – due to the proposed management techniques

4.0 HABITIATS RISK ASSESSMENT

4.1 Sensitivity of receptors

The purpose of this assessment is to risk assessment to specifically identifying the habitats listed below, adequately assessing the risks, and propose preventative measures to mitigate them.

Designation	Site Name	Approximate distance from permit boundary (meters)
Special Area of Conservation (SAC)	Berwickshire & North Northumberland Coast	160
Special Area of Scientific Interest (SSSI)	Northumberland Shore	160
Marine Conservation Zone (MCZ)	Berwick to St Mary's	680

SAC/SSSI

Qualifying habitats: The site is designated under article 4(4) of the Directive (92/43/EEC) as it hosts the following habitats listed in Annex I:

- Large shallow inlets and bays.

- Mudflats and sandflats not covered by seawater at low tide. (Intertidal mudflats and sandflats)
- Reefs
- Submerged or partially submerged sea caves

Qualifying species: The site is designated under article 4(4) of the Directive (92/43/EEC) as it hosts the following species listed in Annex II:

- Grey seal *Halichoerus grypus*

Marine Conservation Zone (MCZ)

The site became a MCZ in May 2019. This means that specific features within this area are protected and, where necessary, regulators will manage marine activities.

This area encompasses the Farne Islands common eider breeding site, and these islands together with Coquet Island are the main breeding areas for common eiders on the east coast of England and form the southern limit of regular breeding of the species on the western side of the North Sea. This area from Coquet to Berwick-upon-Tweed holds 26.2% of the English and 5.7% of the GB non-breeding population.

Appendix 2 – Citation SAC

Appendix 3 – Marine Conservation Zone Information

Conclusions

Mitigation and controls listed in the tables below, will avoid and reduce all potential impacts identified.

It is therefore concluded that with mitigation in place, there will be No Significant Effects upon the Special Area of Conservation (SAC), Special Area of Scientific Interest (SSSI) and Marine Conservation Zone (MCZ) sites from the proposed facility.

Table 4-1 HABITATS Risk Assessment

What do you do that can harm and what could be harmed			Managing the Risk	Assessing the Risk		
Hazard	Receptor	Pathway	Risk management	Probability of exposure	Consequence	What is the overall risk
What has the potential to cause harm?	What is at risk what do I wish to protect?	How can the hazard get to the receptor?	What measures will you take to reduce the risk? – Who is responsible for what?	How likely is this contact?	What is the harm that can be caused?	What is the risk that still remains? The balance of probability and consequence
Odours from the acceptance and storage of waste	SAC - Berwickshire & North Northumberland Coast SSSI - Northumberland Shore (MCZ) - Marine Conservation Zone	Air	All waste tipping and treatment of HCI waste is conducted within a secure building, this acts as a containment measure for the release of any potential odour when waste are handled. No putrescible or readily degradable wastes will be accepted at the site. No odorous wastes will be accepted at the site. Strict waste acceptance procedures will be adhered to, to ensure only permitted wastes are accepted on site. The site will be monitored for odour daily recorded formally in the site inspection sheet. Personnel are trained to assess incoming waste and monitor for odour throughout the working day. In the event that odours are detected, investigations will be undertaken to determine the cause and appropriate	Negligible	Disruption of habitats and breeding sites	Not significant

			<p>remedial action taken.</p> <p>In the event that odorous waste is delivered to site it will be segregated & removed at the earliest opportunity.</p> <p>The Site Manager will be responsible for implementing risk management measures.</p> <p>The site has an Odour Management Plan to control the risk of odour and mitigation controls in place, with a robust complaint and monitoring schedule to identify odour issues that may impact habitats.</p>			
<p>Noise from vehicular movements (site access road and yard)</p> <p>Noise from operation of site plant.</p>	<p>SAC - Berwickshire & North Northumberland Coast</p> <p>SSSI - Northumberland Shore</p> <p>(MCZ) - Marine Conservation Zone</p>	Air.	<p>The site is located within a mainly industrial area with both road and rail links within 2meters of the site boundaries.</p> <p>The site is also located next to a permitted HWRC centre with a high throughput of public vehicles, and company operational plant and equipment.</p> <p>The operator is responsible for the delivery's to and from site, low level traffic movements on site reducing traffic noise and any potential impact on sensitive receptors.</p> <p>Waste treatment is carried out on site within an enclosed building which will mitigate against noise leaving site when tipping, handling and treatment wastes.</p> <p>Waste activities will be conducted only in line with prescribed planning hours.</p> <p>Limited plant on site, forklift and loading</p>	<p>Mobile.</p> <p>Intermittent throughout the day.</p> <p>Low risk</p>	<p>Noise nuisance and disruption to habitats and wildlife</p>	<p>Not significant</p>

			<p>shovel.</p> <p>Onsite plant is bought in line with the company buying policy to purchase new machinery with reduced noise and emission technology, reducing the risk of impact on any bird species and habitats.</p> <p>All equipment will be maintained and operated in accordance with manufacturer's guidance and will be maintained in good working order.</p> <p>The site will be operated so as to minimise noise emissions from the site. Measures that will be taken at the site include:</p> <ul style="list-style-type: none"> • locating plant away from noise-sensitive receptors where possible; • the avoidance of dropping materials from height; • switching plant off when not in use; • enforcement of speed limit for vehicles delivering waste to the site. This will reduce noise associated with high engine speeds; training of all personnel in the need to minimise site noise. • All personnel are responsible for monitoring and reporting excessive noise when carrying out their everyday roles; 			
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			<ul style="list-style-type: none"> • regular maintenance of site plant and machinery to minimise noise resulting from inefficient operation of pumps, generators and engines; • in the event that reversing alarms are found to give rise to complaints, alternative alarms or technology will be investigated; • regular maintenance of site surfaces to prevent the development of potholes. This will significantly reduce noise generated by vehicles, particularly empty vehicles exiting the site; • consideration will be given to the fitting of noise suppression kits on items of plant and equipment, if required; and • all plant will be maintained in accordance with manufacturer’s recommendations to minimise noise emissions. <p>Any noise complaint received will be logged in the site diary. The Site Manager will investigate the complaint and will take action to identify the source of the noise and implement remedial measures where appropriate.</p> <p>The measures employed at the site to minimise the emission of noise will be regularly reviewed by the Site Manager and</p>			
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			<p>additional measures will be employed where required.</p> <p>The procedure for managing complaints is included in the EMS.</p> <p>The management of noise emissions is detailed further in the EMS SOP 3.11.</p>			
To Air:						
<p>Dust from:</p> <p>Vehicle movements</p> <p>Waste storage</p> <p>Dusty wastes</p> <p>Waste deposition</p> <p>Waste surfaces</p>	<p>SAC - Berwickshire & North Northumberland Coast</p> <p>SSSI - Northumberland Shore</p> <p>(MCZ) - Marine Conservation Zone</p>	Air	<p>Due to the nature of the waste accepted at site, there is a potential for dust particles to be released as dust to air from treatment or handling.</p> <p>All tipping, storage and treatment of waste is conducted inside the waste transfer building, with the exception of low levels of inert waste sorted in external bays along the eastern perimeter of the site. These bays have a screen of 4m with 45degree metal screen angled above bays to continue waste and to prevent wind whipping and loss of any material in the bays.</p> <p>All wastes will be stored in designated areas located as far away as possible to the habitats.</p> <p>All incoming and outgoing loads are covered and secure;</p> <p>Daily monitoring of dust is conducted visually and recorded with a site specific DEMP to manage complaints, mitigation and trigger levels.</p> <p>Speed limits will be implemented for vehicles using the site. The storage of wastes on site</p>	Low	Disruption to natural habitats and nesting birds	Not significant

			<p>benefits from concrete hardstanding throughout. Site surfacing is subject to a continuous maintenance programme of rolling repairs.</p> <p>Site access roads and operational areas will be maintained and repaired to minimise emissions of dust due to uneven and poor surfacing.</p> <p>All roads and operational areas will be swept where necessary to reduce dust emissions. If required, the site will be washed down in particularly dry conditions.</p> <p>Daily visual inspections of all areas of the site and the site boundary will be carried out by site personnel. In dry windy conditions the frequency of these inspections will be increased, if required.</p> <p>In the event that significant visual dust is observed at the boundaries of the operational areas, action will be taken to suppress the dust in accordance with the DEMP and operations ceased.</p>			
To Water						
<p>Runoff from waste storage areas & site surfaces</p> <p>Percolation of contaminated water</p>	<p>SAC - Berwickshire & North Northumberland Coast</p> <p>SSSI - Northumberland</p>	<p>Overland percolation through the ground or discharge surface waters</p>	<p>No surface water features within 1.2km with exception of the North Sea.</p> <p>The site is fully contained with a kerbed, impermeable surface leading to a three stage interceptor discharging to the NWL sewer. This prevents the release of any contaminated water that would enter any</p>	<p>Low</p>	<p>Contamination of surface water and groundwater impacting natural habitats, fauna and flora</p>	<p>Not significant</p>

	<p>Shore (MCZ) - Marine Conservation Zone</p>		<p>watercourses used by sensitive species or cause pollution or coastal features.</p> <p>The waste reception/treatment area of the site is falling towards a formal drainage point which is retained within the site's sealed water drainage system.</p> <p>All waste will be stored and treated on an impermeable surface to prevent contamination to groundwater.</p> <p>Strict waste acceptance procedures will ensure that only permitted waste types are accepted on site.</p> <p>In the event that non-conforming waste is delivered to site, it will be isolated contained and removed from site at the earliest opportunity.</p> <p>Fuels are stored inside a building in bunded tanks for secondary containment. Any refiling or vehicle maintenance will be carried out in this building.</p> <p>Therefore the risk of pollution is low, where source pathway receptor path is broken.</p> <p>The Site Manager will be responsible for implementing risk management measures.</p> <p>Drainage infrastructure is checked weekly and the interceptor is maintained on a quarterly basis.</p> <p>Drainage and infrastructure is managed within Section 1.6 of the EMS.</p>			
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Pests						
<p>Birds, vermin and insects.</p>	<p>SAC - Berwickshire & North Northumberland Coast</p> <p>SSSI - Northumberland Shore</p> <p>(MCZ) - Marine Conservation Zone</p>	<p>Via air (flies and birds) or over ground (vermin and birds).</p>	<p>Although permitted to accept various waste types, the facility accepts only HCI wastes. Food waste or black bin bag waste is not accepted, these waste would be rejection upon identification. This reduces the risk of pest activity on stie. Waste are collected by company vehicles and are inspected by trained operative before collection and delivery to site. This further reduced the risk pf the acceptance of non compliant or putrescible wastes.</p> <p>The company conducts pre- and collection discussions with customer with instructions of permitted wastes and the returns policy – <i>if prohibited items are found when the skip is emptied you are likely to be charged extra and the restricted items returned to customer.</i></p> <p>Surfaces used for the storage of waste are to be kept clean with robust housekeeping procedures in place.</p> <p>Staff welfare/office areas are kept clean and free of waste and exposed food.</p> <p>The site is to be monitored daily for any visible signs of rodent or insect activity, such as runways, and the findings logged in the site check sheet;</p> <p>If any signs of potentially problematic numbers of pests or vermin are discovered at</p>	<p>Negligible</p>	<p>Disruption and loss of natural habitats impacting on nesting/breeding populations</p>	<p>Not significant</p>

			<p>the site, the Site Manager or designated person is to contact a pest contractor as soon as possible.</p> <p>The management of pests is further detailed in the EMS SOP3.13.</p>			
Mud/Litter						
Litter from acceptance and storage of waste	<p>SAC - Berwickshire & North Northumberland Coast</p> <p>SSSI - Northumberland Shore</p> <p>(MCZ) - Marine Conservation Zone</p>	Airborne litter	<p>Due to the nature of the waste to be accepted on site, it is not anticipated that litter will pose a serious risk. However, the boundary of the site and its environs will be regularly visually inspected and any litter cleaned up.</p> <p>The site will benefit from a perimeter fence which will limit the potential for litter to escape off-site.</p> <p>The majority of all waste activities are enclosed and vehicle movements are located as far away from habitats as possible.</p> <p>All incoming and outgoing loads are covered and secure.</p> <p>It will be the responsibility of the site staff to monitor the site for any signs of escaping materials either from within the site or from vehicles delivering or removing materials to and from the site. A skip will be situated on site to accommodate on site waste.</p> <p>Inspections will be carried out on a daily basis and a record maintained within the daily check sheets.</p> <p>The management of litter is detailed further in the EMS SOP 3.14.</p>	Low	Disruption and loss of natural habitats impacting on nesting/breeding populations	Not significant

<p>Mud on roads</p>	<p>SAC - Berwickshire & North Northumberland Coast</p> <p>SSSI - Northumberland Shore</p> <p>(MCZ) - Marine Conservation Zone</p>	<p>Transferral of mud on vehicle wheels</p>	<p>The access site road is fully surfaced with concrete. It is therefore not expected that mud will feature as a problem on the site. The following measures will be taken to prevent the deposition or tracking of mud or debris from the site onto public areas or highways: the site will have the benefit of a dry wheel wash facilities, and power washer if required, with no detergents used & site surfaces will be maintained free of significant quantities of mud and debris;</p> <ul style="list-style-type: none"> • all operational areas will be subject to monitoring by staff throughout the working day; and • all vehicles leaving operational areas will, before leaving the site, be checked to ensure that they are clear of loose waste and that any products being exported from the site are secure. <p>In the event that mud, debris or waste arising from the site is deposited onto public areas outside the site, the following remedial measures will be implemented: the affected public areas outside the site will be cleaned; and traffic will be isolated from sources of mud and debris within the site to prevent further tracking of mud and debris, and measures will be taken to clear any such sources as soon as practicable.</p> <p>The site DEMP covers the management and</p>	<p>Low</p>	<p>Disruption and loss of natural habitats impacting on nesting/breeding populations</p>	<p>Not significant</p>
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Depothire Ltd

Environmental Risk Assessment

April 2023

			prevention of litter and mud arising from site activities and impact on external receptors.			
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Table 4 – 2 HABITATS Accidents Risk Assessment and Management Plan

What do you do that can harm and what could be harmed			Managing the Risk	Assessing the Risk		
Hazard	Receptor	Pathway	Risk management	Probability of exposure	Consequence	What is the overall risk
What has the potential to cause harm?	What is at risk what do I wish to protect?	How can the hazard get to the receptor?	What measures will you take to reduce the risk? – Who is responsible for what?	How likely is this contact?	What is the harm that can be caused?	What is the risk that still remains? The balance of probability and consequence
Unauthorised waste	SAC - Berwickshire & North Northumberland Coast SSSI - Northumberland Shore (MCZ) - Marine Conservation Zone	Via air (odours and dust) Overland (to sewer, surface water and groundwater)	Although permitted to accept various waste types, the facility accepts only HCl wastes. Unpermitted waste such as asbestos, oils, hazardous liquids, clinical waste, food waste or black bin bag waste is not accepted, these wastes would be rejection upon identification. Wastes are collected by company vehicles and are inspected by trained operative before collection and delivery to site. This further reduced the risk of the acceptance of non-compliant or putrescible wastes. The company conducts pre- and collection discussions with customer with instructions of permitted wastes and the returns policy – <i>if prohibited items are found when the skip is emptied you are likely to be charged extra and the restricted items returned to customer.</i> Upon delivery waste will be subject to strict waste acceptance procedures to	Low	Disruption and loss of natural habitats impacting on nesting/breeding populations Risk of odour, contamination to water or land	Not significant

			<p>identify, reject and/or segregate potentially non-conforming waste.</p> <p>Only waste authorised by the permit will be accepted at the site.</p> <p>All wastes will be subject to inspection and checking against the declaration on the waste transfer documentation.</p> <p>In the event that unauthorised waste is delivered to the site, the waste will be reloaded onto the delivery vehicle for removal from site, or will be segregated and stored in a designated quarantine area prior to export from site.</p> <p>The waste acceptance procedures are included in the EMS.</p> <p>The Site Manager will be responsible for implementing risk management measures.</p>			
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<p>Fire</p>	<p>SAC - Berwickshire & North Northumberland Coast</p> <p>SSSI - Northumberland Shore</p> <p>(MCZ) - Marine Conservation Zone</p>	<p>Air, water runoff</p>	<p>The Fire Prevention Plan is included in the site EMS.</p> <p>Robust turnover of incoming and processed mitigate against the risk of a fire on site and the long term impact a fire could impact on air quality.</p> <p>Internal site surfacing infrastructure will contain any contaminated fire water preventing any pollution risk to the ground water and source path way receptor to local water courses and habitats.</p> <p>In the event of a major fire, the following action will be taken:</p> <p>the Site Manager and Fire Brigade will be notified immediately and the Environment Agency as soon as practicable;</p> <p>the burning area will be isolated and attempts will be made to extinguish the fire utilising the onsite fire extinguishers, if safe to do so; and</p> <p>the site and buildings will be evacuated.</p>	<p>Low</p>	<p>Nuisance (smoke and fumes) and harm to habitats and health of birds , insects</p> <p>Water contamination (runoff) local water bodies</p>	<p>Not significant</p>
<p>Spillage and Leakage</p>	<p>SAC - Berwickshire & North Northumberland Coast</p> <p>SSSI - Northumberland Shore</p> <p>(MCZ) - Marine Conservation Zone</p>	<p>Runoff and percolation through ground.</p> <p>Direct exposure and transport via air/land/water</p>	<p>To prevent loss of containment and minimise the risk and impact of releases the following measures will be implemented:</p> <p>Containment system: any facilities for the storage of oils, fuels or chemicals will be sited above ground on impervious bases and surrounded by impervious bund walls. The volume of the banded compound will be at least the equivalent to the capacity</p>	<p>Low</p>	<p>Contamination of groundwater and surface water causing harm to habitats and health of birds , insects</p> <p>Water</p>	<p>Not significant</p>

			<p>of the tank plus 10%. All filling points, vents and gauges will be located within the bund.</p> <p>Site surfacing is fully impermeable, with the drainage system leading to a three stage oil separator interceptor , with a shut off valve to allow the closure of the interceptor to retain all fire water/contaminated water onsite.</p> <p>Planned preventive maintenance of all drainage and containment systems are in place.</p> <p>Storage vessels: storage tanks will be constructed to the appropriate British Standard;</p> <p>Inspection: tanks will be inspected visually on a daily basis by site staff to ensure the continued integrity of the tanks, and identify the requirement for any remedial action;</p> <p>Spill kits: materials suitable for absorbing and containing minor spillages will be maintained on site; and</p> <p>Monitoring techniques: the site staff will undertake daily monitoring for evidence of spillage and leakage.</p> <p>In the event of any potentially polluting leak or spillage occurring on site, the following action will be taken:</p> <p>Minor spillages will be cleaned up immediately, using sand or proprietary absorbent. The resultant materials will be</p>		<p>contamination (runoff) local water bodies</p>	
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			<p>placed into containers and will then be removed from site and disposed of at a suitably permitted facility. The incident will be logged in the site diary.</p> <p>The spillage procedure, included in the EMS, provides further information with respect to spillages on site.</p>			
Security and Vandalism	<p>SAC - Berwickshire & North Northumberland Coast</p> <p>SSSI - Northumberland Shore</p> <p>(MCZ) - Marine Conservation Zone</p>		<p>The following security measures are in place:</p> <p>Site perimeter: the site benefits from perimeter palisade fencing;</p> <p>Security gates: the site entrance barriers will be locked at all times when the facility is unattended and when the site is not in use;</p> <p>The site is monitored by an external security company 24 hours a day using CCTV with interactive movement sensors. If the movement sensors are triggered during out of hours key site personnel are automatically notified;</p> <p>Inspection: gates and fencing extending around the site will be inspected regularly by the operations staff to identify deterioration and damage, and the need for any repairs;</p> <p>Maintenance and repair: fencing and gates will be maintained and repaired to ensure their continued integrity. In the event that damage is sustained repairs will be made by the end of the working day. If this is not possible, suitable measures will be taken</p>	Low	Contamination of land and surface waters, impacting on habitats	Not significant

			<p>to prevent any unauthorised access to the site and permanent repairs will be affected as soon as practicable;</p> <p>Authorised access system: all visitors to the site will be required to register in the visitor's book and sign out again on exit to minimise the risk of unauthorised visitors being present on site; and</p> <p>Monitoring techniques: operational procedures, including regular inspections, will ensure continual monitoring of security provision at the site.</p> <p>In the event of a breach of security at the site, the cause will be investigated and appropriate mitigation measures implemented.</p> <p>Records to be maintained include inspections and maintenance of security fencing and gates, breaches of security, investigations and actions taken.</p> <p>Site Security procedures are in place supported by the site specific Fire Prevention Plan.</p>			
<p>Flooding</p>	<p>SAC - Berwickshire & North Northumberland Coast</p> <p>SSSI - Northumberland Shore</p> <p>(MCZ) - Marine Conservation Zone</p>	<p>Overland</p>	<p>According to the UK government Flood Map for Planning, a small part of the south of the site lies within flood zone 1. Land and property in flood zone 1 have a low probability of flooding.</p> <p>Evacuation procedures will be implemented in the event of flooding but flooding is not expected to impact upon the site as it is elevated.</p>	<p>Low</p>	<p>Inundation of site with flood water</p> <p>Contamination of land and surface waters which are habitats for birds, fish, insects</p>	<p>Not significant</p>

			<p>Sandbags and drainage controls on site to contain any water contaminated with wastes mixed with flood waters, the site is fully fenced, kerbed and netted to contain large particles of waste, the site fully concreted reducing source receptors pathway to ground waters and local water courses.</p> <p>The Site Manager will be responsible for implementing risk management measures.</p>			
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Nature and Heritage Conservation

Screening Report: Bespoke Waste

Reference	EPR/KB3304KF/A001
NGR	NT 99181 55199
Buffer (m)	30
Date report produced	31/03/2021
Number of maps enclosed	4

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

Nature and heritage conservation sites	Screening distance (m)	Further Information
Special Areas of Conservation (cSAC or SAC)	1000	Joint Nature Conservation Committee
Berwickshire & North Northumberland Coast		
Marine Conservation Zone (MCZ)	1000	Joint Nature Conservation Committee
Berwick to St Mary's		
Sites of Special Scientific Interest (SSSI)	1000	Natural England
Northumberland Shore		
Local Wildlife Sites (LWS)	200	Appropriate Local Record Centre (LRC)
Marshall Meadows Bay to Berwick		

Where protected species are present, a licence may be required from [Natural England](#) to handle the species or undertake the proposed works.



The relevant Local Records Centre must be contacted for information on the features within local wildlife sites. A small administration charge may also be incurred for this service.

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.


customer service line
03708 506 506

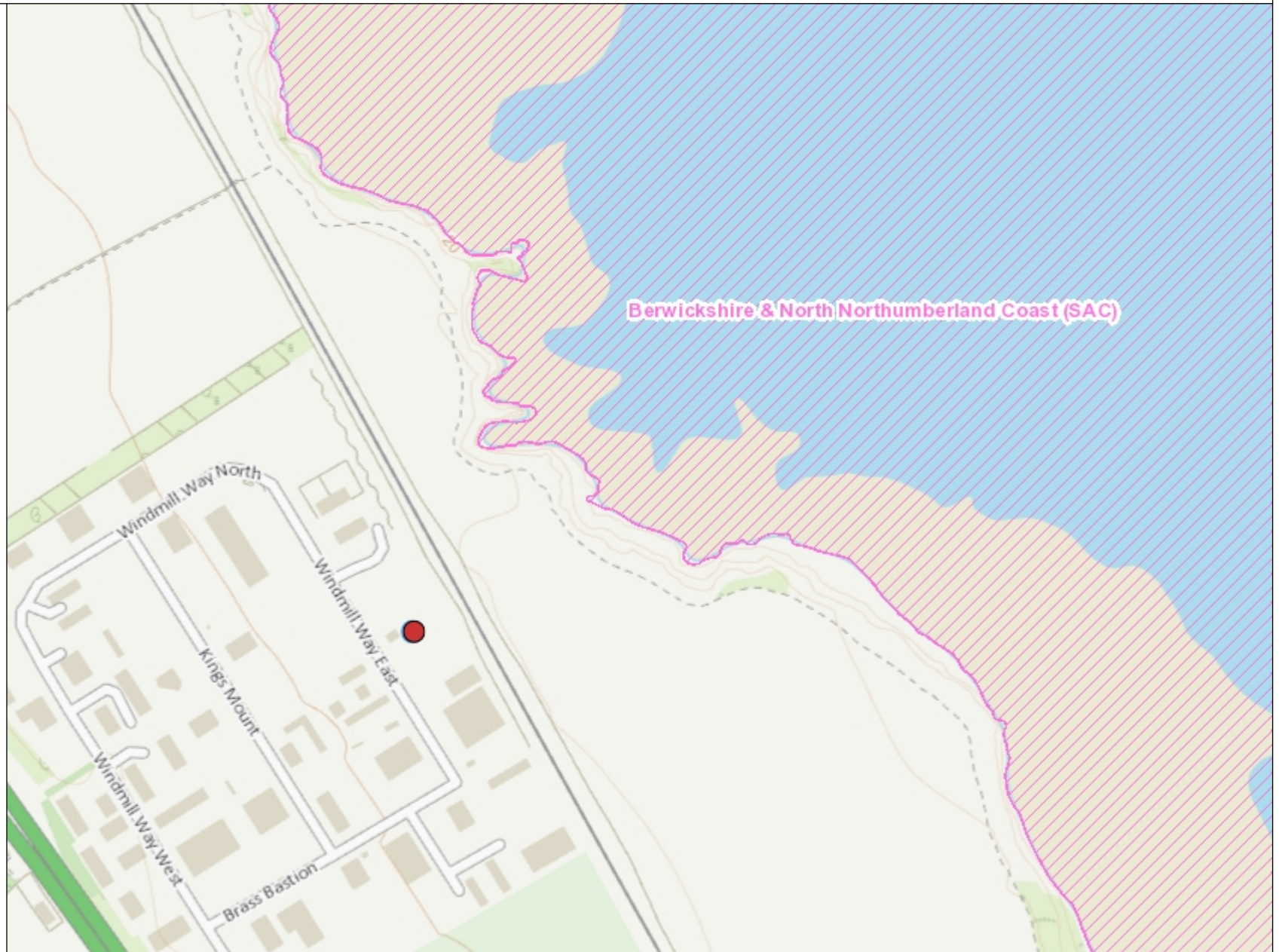
incident hotline
0800 80 70 60

floodline
0845 988 1188

www.environment-agency.gov.uk

Legend


-  SAC (England)

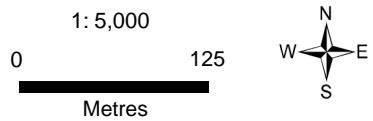
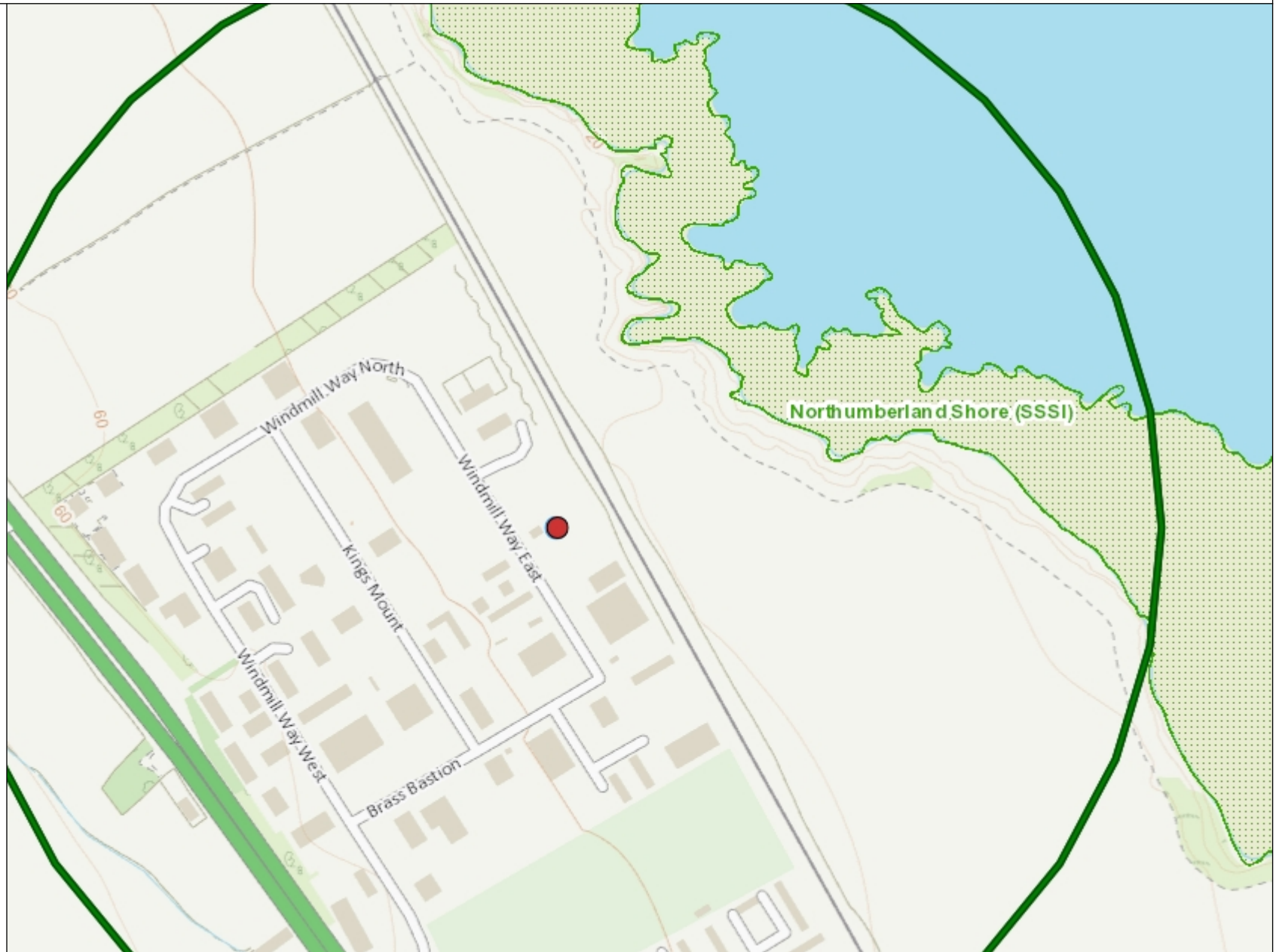


Berwickshire & North Northumberland Coast (SAC)

SSSI


Legend

 SSSI (England)



MCZ

Legend

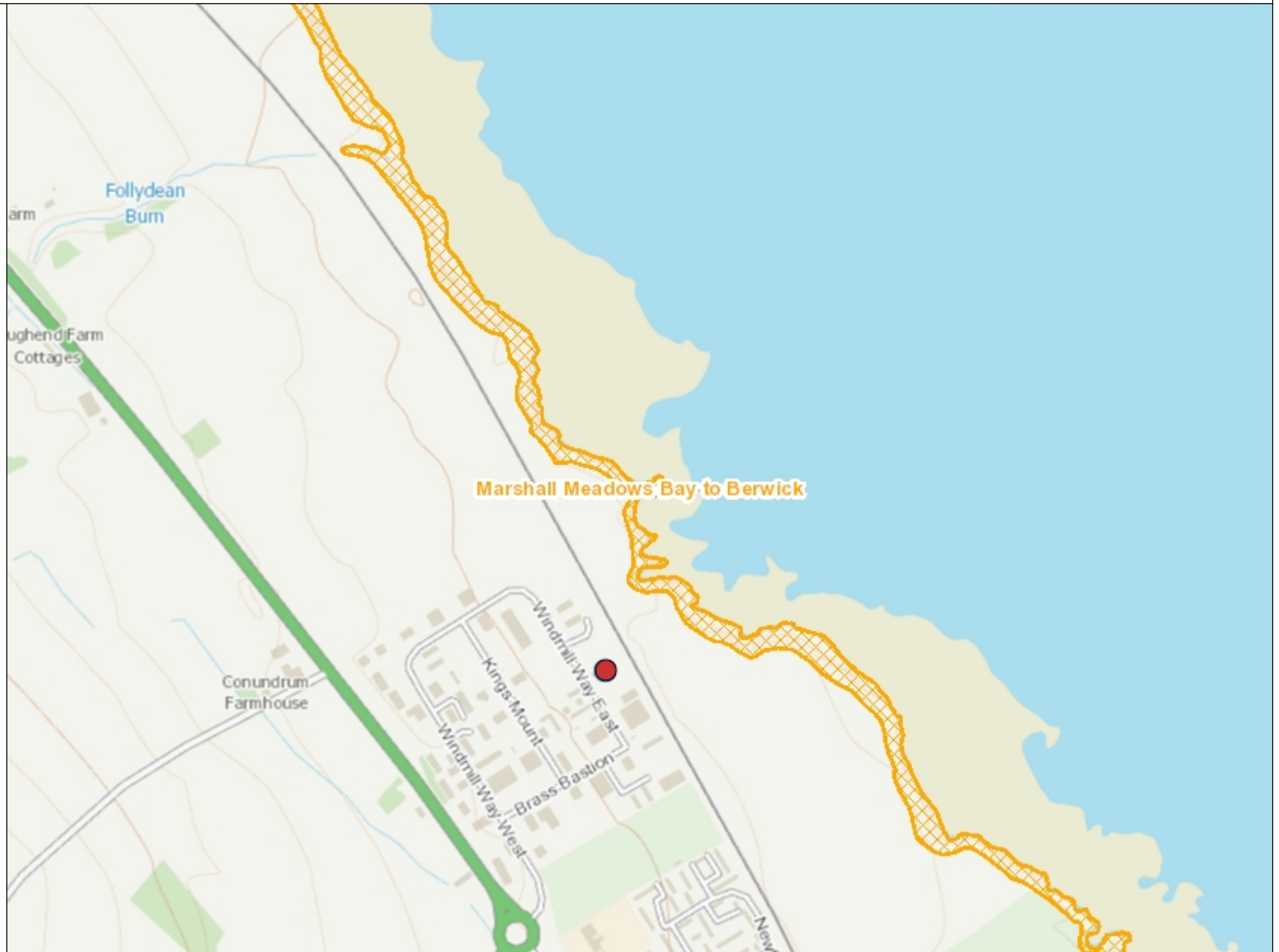
 Marine Conservation Zones



Local Wildlife Site

Legend

 Local Wildlife Sites



EC Directive 92/43 on the Conservation of Natural Habitats and of Wild Fauna and Flora

Citation for Special Area of Conservation (SAC)

Name:	Berwickshire and North Northumberland Coast
Unitary Authority/County:	Northumberland, Scottish Borders
SAC status:	English part designated on 1 April 2005 Scottish part designated on 17 March 2005
Grid reference:	NU206401
SAC EU code:	UK0017072
Area (ha):	65334.94
Component SSSI:	Bamburgh Coast and Hills SSSI, Burnmouth Coast SSSI, Castle Point to Cullernose Point SSSI, Howick to Seaton Point SSSI, Lindisfarne SSSI, Newton Links SSSI, Northumberland Shore SSSI, St Abb's Head to Fast Castle SSSI, The Farne Islands SSSI

Site description:

Whilst predominantly rocky, this extensive and diverse stretch of coastline has several characteristic, sediment-dominated embayments in north-east England, including Budle Bay, Beadnell Bay and Embleton Bay. Each of these areas is relatively exposed and uniform in nature and is characterised by crustacean /polychaete- and bivalve/polychaete-biotopes. In the subtidal zone, Beadnell and Embleton Bays form a sandy break in the otherwise continuous reef habitat in this site. These areas are characterised by extensive areas of clean sand with often dense populations of the heart urchin *Echinocardium cordatum*, and razor clams *Ensis siliqua* and *E. arcuatus*.

Stretches of the coast in England support a very extensive range of intertidal mudflats and sandflats, ranging from wave-exposed beaches to sheltered muddy flats with rich infaunal communities. Those in the Lindisfarne and Budle Bay area and on the adjacent open coast to the north are the most extensive in north-east England. They support the largest intertidal beds of narrow-leaved eelgrass *Zostera angustifolia* and dwarf eelgrass *Z. noltei* on the east coast of England, a diverse infauna, and some large beds of mussels *Mytilus edulis*. Some of the bays along the open coast have mobile sediments, with populations of sand-eels *Ammodytes* sp., small crustaceans and polychaete worms. More sheltered sediments have very stable lower shore communities of burrowing heart urchins and bivalve molluscs.

Moderately wave-exposed reef habitats occur throughout the site. The subtidal rocky reefs and their rich marine communities, together with the wide variety of associated intertidal reefs, are the most diverse known on the North Sea coast. Their remarkably varied nature is due to the wide range of physical conditions in the area, from wave-exposed locations on the open coast, through more sheltered reefs within bays, to those exposed to strong tidal streams in sounds and off headlands. There is also a diverse range of rock types, including soft limestones and hard volcanic rock. The Farne Islands are of special importance as they are among the very few rocky islands with extensive reefs in the enclosed North Sea. A large number of the species present are characteristic of cold water and several reach their southern or eastern limit of distribution within the area.

Caves occur throughout the site in both the intertidal and the subtidal zones in a range of different hard rock exposures. There are examples of partially submerged caves in the cliffs

north of Berwick and in the limestone at Howick (south of Craster), and there are submerged sea caves, tunnels and arches in the volcanic rock of the Farne Islands and around St Abb's Head. Caves occur in association with reefs, in both the intertidal and the subtidal zones. Depending on the depth of the cave and its morphology, the site supports a range of distinct biological communities.

The section of the site in north-east England is representative of grey seal *Halichoerus grypus* breeding colonies in the south-east of its breeding range in the UK. It supports around 2.5% of annual UK pup production.

Qualifying habitats: The site is designated under **article 4(4)** of the Directive (92/43/EEC) as it hosts the following habitats listed in Annex I:

- Large shallow inlets and bays.
- Mudflats and sandflats not covered by seawater at low tide. (Intertidal mudflats and sandflats)
- Reefs
- Submerged or partially submerged sea caves

Qualifying species: The site is designated under **article 4(4)** of the Directive (92/43/EEC) as it hosts the following species listed in Annex II:

- Grey seal *Halichoerus grypus*

This citation relates to a site entered in the Register of European Sites for Great Britain.

Register reference number: UK0017072

Date of registration: 14 June 2005

Signed: *Trevor Salmon*

On behalf of the Secretary of State for Environment,
Food and Rural Affairs

Department for Environment, Food and Rural Affairs

Berwick to St. Mary's Marine Conservation Zone

This document sets out why this site is important, the features protected and general management information.

31 May 2019



Common eider © Allan Drewitt

Overview

This site became a Marine Conservation Zone (MCZ) in May 2019. This means that specific features within this area are protected and, where necessary, regulators will manage marine activities.

Where is the site?

The Berwick to St. Mary's MCZ is an inshore site located along the Northumberland coast in north-east England. The proposed area extends from Berwick-upon-Tweed in the north to St Mary's Island in the south and covers an area of 634 km².

Why is the site important?

MCZs, together with other types of marine protected areas, will form the UK contribution to an international network of protected sites in the north east Atlantic. The network will help to deliver the government's vision of clean, healthy, safe, productive and biologically diverse oceans and seas. MCZs protect typical, rare or declining habitats and species found in our seas.

Berwick to St Mary's MCZ holds nationally important numbers of breeding common eider. The area also supports regionally and nationally (England) important numbers of common eider in the non-breeding season.

This area encompasses the Farne Islands common eider breeding site, and these islands together with Coquet Island are the main breeding areas for common eiders on the east coast of England and form the southern limit of regular breeding of the species on the western side of the North Sea. This area from Coquet to Berwick-upon-Tweed holds 26.2% of the English and 5.7% of the GB non-breeding population.

The conservation aim of the proposal for both breeding and non-breeding common eider is to provide a critical seaward maintenance and foraging extension surrounding the breeding colony at Coquet Island and Farne Islands. The site would cover areas on which common eider are ecologically dependent, in this case for behaviours such as foraging, preening, bathing and displaying.

Designation of this site as a Marine Conservation Zone protects the following feature. You can find detailed explanations of MCZ features at <http://jncc.defra.gov.uk/page-4527>.

Protected features	General management approach
Common eider (<i>Somateria mollissima</i>)	Recover to a favourable condition

Management of the site

Now that this site has been designated, some activities may need additional management. Activities and the management measures used to regulate them may need to change if new evidence becomes available.

Most marine activity is already regulated by the relevant regulatory bodies. There are existing byelaws and national laws that regulators use to manage fishing, coastal development, recreation and pollution. These also apply in MCZs.

Regulators will manage each site according to the features and activities in, or near, a specific area. Management measures will be implemented at sites most at risk of damage first, regulating only those activities which have a detrimental impact on the designated features. Any management measures that are required for MCZs will be applied on a case-by-case basis.

Management in MCZs can take several different forms, including introducing voluntary measures, use of the existing planning and licensing framework, specific byelaws and orders. There has to be public consultation on permanent byelaws and orders. For activities that already need a marine licence, regulators consider the MCZ in their decision making processes. Find out more about marine licensing in MCZs at <https://www.gov.uk/government/publications/marine-conservation-zones-mczs-and-marine-licensing>.

Regulators

This table lists the authorities responsible for MCZs and the activities they manage.

Lead regulator	What it manages
Inshore Fisheries and Conservation Authorities (IFCAs) http://www.association-ifca.org.uk	<ul style="list-style-type: none"> • Fisheries in the inshore area (0-6 nautical miles (nm)) including commercial fisheries and recreational sea angling.
Marine Management Organisation (MMO) https://www.gov.uk/government/organisations/marine-management-organisation	<ul style="list-style-type: none"> • Fisheries within British limits around the coast of England. • Licensable activities such as construction, alteration or improvement of works, dredging and disposal, other removals or deposits, incineration or the scuttling of vessels within England's marine area. • Section 36 (of the Electricity Act 1989) Consents and Safety Zones for offshore renewable energy installations producing up to 100MW. • Activities requiring a marine wildlife licence.
Environment Agency (EA) https://www.gov.uk/government/organisations/environment-agency	<ul style="list-style-type: none"> • Fisheries for migratory and freshwater fish. • Coastal protection and flood management. • Water quality, including environmental permits for discharges from terrestrial sources.
Oil and Gas Authority https://www.ogauthority.co.uk/	<ul style="list-style-type: none"> • Licensing for exploration and exploitation of oil and gas reserves.

<p>Department for Business, Energy and Industrial Strategy (BEIS) https://www.gov.uk/government/organisations/department-for-business-energy-and-industrial-strategy</p> <p>Offshore Petroleum Regulator for Environment and Decommissioning (OPRED) – Part of BEIS</p>	<ul style="list-style-type: none"> • Oil and gas related activities • Renewable energy related activities • Environmental approvals and consents for offshore oil and gas related activities, Carbon Capture and Storage and Gas Unloading and Storage, and decommissioning activities.
<p>Harbour Authorities and Local Planning Authorities</p>	<ul style="list-style-type: none"> • Harbour authorities have management responsibilities for ports and coastal waters within their limits. • Local planning authorities manage activities at the coast. These include coastal recreation, public rights of way (including the English Coastal Path), tourism, economic regeneration, flood protection, and planning and development on coasts and estuaries, including aquaculture in the intertidal zone.
<p>Department for Transport (DfT) https://www.gov.uk/government/organisations/department-for-transport</p>	<ul style="list-style-type: none"> • Policy on environmental impacts associated with ports and shipping, including pollution from ships. • Policy on maritime safety including navigation safety.
<p>Maritime and Coastguard Agency (MCA) - An Executive Agency of the Department for Transport https://www.gov.uk/government/organisations/maritime-and-coastguard-agency</p>	<ul style="list-style-type: none"> • Vessel safety consents, including certification of seafarers and equipment.
<p>Natural England (NE) https://www.gov.uk/government/organisations/natural-england</p>	<ul style="list-style-type: none"> • Establishment and management of the English Coastal path. • Activities requiring consents and ascents within or adjacent to Sites of Special Scientific Interest (SSSIs). • Activities requiring wildlife licences for terrestrial and intertidal species.
<p>The Planning Inspectorate https://www.gov.uk/government/organisations/planning-inspectorate</p>	<ul style="list-style-type: none"> • Activities requiring Development Consent Orders under the Planning Act 2008, regarded as Nationally Significant Infrastructure Projects

Further information

Read about government policy on MCZs at:

<https://www.gov.uk/government/collections/marine-conservation-zone-designations-in-england>

Read the advice provided by Natural England on MCZs at:

<http://publications.naturalengland.org.uk/publication/5703660445368320>



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