

HARCOURT FIBER RECYCLING FACILITY

Environmental Permit Application

Environmental Risk Assessment

Prepared for: OSO Fiber UK Limited

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1.0 Introduction

OSO Fiber UK Limited (OSO) has instructed SLR Consulting Limited (SLR) to prepare an Environmental Permit (EP) application for the proposed Fiber Recycling Facility in Halesfield under the Environmental Permitting (England and Wales) Regulations 2016 (as amended). Herein the facility will be referred to as 'the Site'.

1.1 Methodology

This Environmental Risk Assessment (ERA) is an assessment of the risks to the environment and to human health that may be associated with the proposed operations at the Site.

The assessment has been completed in accordance with the Environment Agency (EA) Technical Guidance '*Risk Assessments for your Environment Permit*' dated May 2021. 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.

This ERA uses the following approach for identifying and assessing the risks from the proposed operation:

- Step 1** Identify risks and sources of risk from your activity.
- Step 2** Where risks are identified from Step 1 then identify the receptors that could be affected
- Step 3** Identify potential pathways between the sources of risk and receptors
- Step 4** Assess the risks and check that they are acceptable. Justify appropriate measures to control your risks, if necessary.
- Step 5** Submit your assessment.

Section 2.0 of this document is a screening step to identify the risks requiring consideration as part of this assessment.

Section 3.0 identifies people or parts of the environment that could be harmed (at potentially significant risk) by the activity. The ERA for an EP application requires all receptors that are near the Site and could reasonably be affected by the activities to be identified and considered as part of the assessment.

For the purposes of this ERA a 1km radius from the Site's EP boundary has been adopted in reviewing potentially sensitive receptors of ecological importance along with features such as sites of cultural and natural heritage. A radius of 500m from the Site's EP boundary has been adopted for all other potentially sensitive receptors (for example, residential, commercial, industrial, agricultural and surface water receptors).

Section 4.0 of this document presents the assessment and demonstrates that any risks of pollution or harm will be mitigated to manage the risk.

This ERA should be read in conjunction with the following documents submitted with this EP application:

- Non-Technical Summary;
- Drawings;
 - 001 Site Location Plan
 - 002 Environmental Site Setting
 - 003 Environmental Site Setting
 - 004 Detailed Site Layout, Fire Management and Prevention
- Operating Techniques;
- Site Condition Report;

- Fire Prevention Plan; and
- Dust and Emissions Management Plan.

2.0 Identifying the Risks

Step 2 is a screening step to identify the potential risks to the environment from the development. The following are generally considered to require assessment for bespoke operations:

- Amenity and Accidents;
- Site Waste (Installations Only);
- Global Warming Potential;
- Odour;
- Noise; and
- Point source emissions to air, water and land.

There will be no point source emissions to groundwater, surface water, air or land resulting from the proposed operation and neither will there be any site waste arising or global warming potential.

Therefore only 'Amenity and Accidents', remains applicable for assessment in this instance, and includes the consideration of odour, noise and vibration, fugitive emissions (including dust, mud, litter and pests) and accidents.

3.0 Site Setting and Receptors

3.1 Site Setting

The site is centred on National Grid Reference SJ 71143 04637 on Halesfield 15, Telford, TF7 4LE and lies approximately 3km east of Ironbridge and 5km southeast of Telford. The site is accessed via Halesfield 15 Road, which leads to the A442 south west of the site.

The site is located in the Halesfield Industrial Estate and is surrounded on all sides by commercial/industrial premises, deciduous woodland and small areas of open ground. Residential areas located within Telford are located to the west of the site.

The site location is illustrated on Drawing 001. The permit boundary is shown on Drawing 002, and the local receptors and cultural and natural heritage receptors are illustrated on Drawing 003.

The surrounding land uses and local receptors within 500m are identified on Drawing 03 Environmental Site Setting, in addition to the cultural and natural heritage within 1km.

A summary of the Site's immediate surrounding land uses is identified in Table 3-1 below.

Table 3-1
Surrounding Land Uses

Boundary	Description
North	An area of deciduous woodland, the A4169 beyond which is commercial and industrial units and open ground.
East	Commercial and industrial units. Beyond this lies areas of open ground.
South	Industrial businesses located within Halesfield Industrial Site, Halesfield 13 road and areas of open ground beyond.
West	Commercial businesses lie to the west immediately beyond an area of deciduous woodland. Beyond this lies Brockton Way (A442) and residential areas including John Randall Primary School.

The immediate surrounding land uses are described in further detail below.

3.1.1 Commercial and Industrial Premises

The site lies within the Halesfield Industrial Estate and is surrounded on all sides by commercial and industrial premises. An AO Recycling site is located adjacent to the southern boundary.

3.1.2 Residential Properties

Residential properties are located along Greenwood Close approximately 400m west and along Cuckoo Oak Green 480m northwest of the Site. An isolated residential property lies approximately 500m east of the Site.

3.1.3 Local Transport Network

The site is accessed via Halesfield 15 which links to the Brockton Way (A442) approximately 330m to the west of the Site.

3.1.4 Educational

John Randall Primary School lies 490m to the west of the Site's boundary.

3.1.5 Surface Water Features

Several surface water drains can be found within 500m of the Site's boundary. The closest of these lies approximately 30m north of the Site.

3.1.6 Areas of Open Ground

Immediately to the east, south and west of the Site lies areas of open ground.

3.1.7 Deciduous Woodland

An area of deciduous woodland lies adjacent to the Site's northern boundary. An additional area lies approximately 60m west of the Site.

3.2 Geology

A review of the British Geological Survey (BGS) map¹ reveal that the site overlies bedrock of Enville Member which is indicative of a local environment previously dominated by rivers. Superficial deposits are comprised of Till, Devensian - Diamicton which indicates a local environment previously dominated by ice age conditions.

3.3 Hydrogeology

3.3.1 Aquifer Designations

The bedrock underlying the Site is classified as a Secondary A Aquifer. The superficial deposits are classed as Secondary (undifferentiated) on the Multi-Agency Information for the Countryside (MAGIC)² website.

3.3.2 Source Protection Zones

The site does not lie within a Source Protection Zone (SPZ).

3.4 Hydrology

The Groundwater Vulnerability layer on the MAGIC map reveals that the majority of the Site lies within an area known for groundwater vulnerability classified as a Medium - Low. The east of the Site lies in a Low groundwater vulnerability zone.

The Site lies within a Flood Zone 1 and therefore has a low probability of flooding³.

3.5 Ecology

The MAGIC website has been assessed to determine the ecological site setting as shown in the following sections.

3.5.1 Local Nature Reserve

Madeley Local Nature Reserve (LNR) is located approximately 560m northwest of the Site. The LNR is known for its naturally and artificially recolonised pit mounds, woodland, grassland and open water including a disused canal.

¹ British Geological Survey, Available at www.bgs.ac.uk, accessed in June 2021

² Multi-Agency Information for the Countryside – Available at: <http://www.magic.gov.uk>, accessed June 2021.

³ Flood Map for Planning <https://flood-map-for-planning.service.gov.uk>, accessed June 2021

3.5.2 Ancient Woodland

There are two areas of unnamed ancient woodland within 1km of the Site's boundary. The closest lies 730m northeast of the Site. An additional area is situated approximately 900m northeast of the Site.

The searches confirmed that there are none of the following within the 1km:

- Sites of Special Scientific Interest (SSSI);
- Special Areas of Conservation (SAC);
- Ramsar's;
- Special Protection Area's (SPA);
- RSPB Reserves;
- Areas of Natural Beauty;
- National Nature Reserves; and
- National Parks.

3.6 Cultural and Heritage

The search on MAGIC confirmed that the following features do not lie within 1km of the Site:

- World Heritage Sites;
- Scheduled Monuments;
- Listed Buildings;
- Registered Battlefields; and
- Registered Park and Garden.

3.7 Identified Receptors

Table 3-2 and Drawing 003 identify the receptors which are considered to be potentially sensitive and could reasonably be affected by activities at the Site.

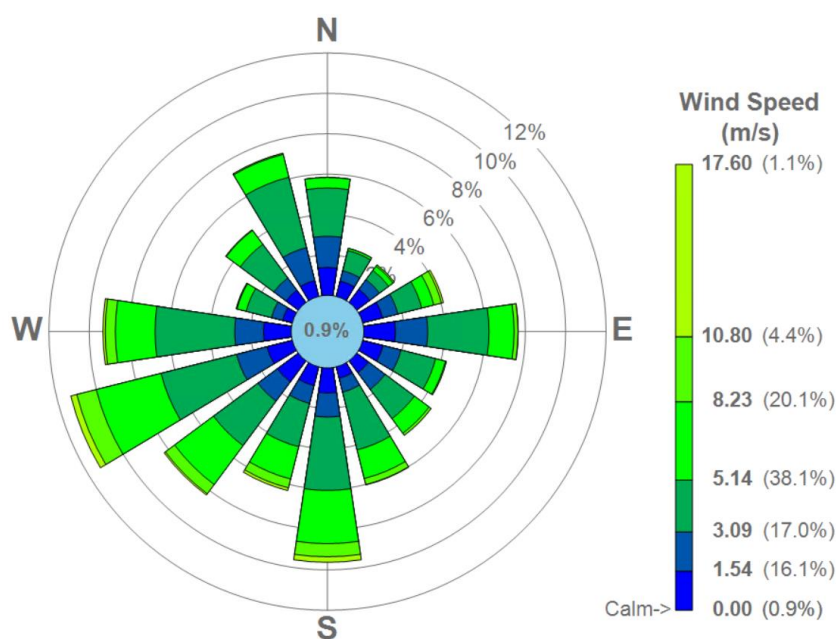
Table 3-2
Identified Receptors

Receptor Name	Receptor Type	Direction from Site	Approximate Distance from Site Boundary at closest point (in metres)
Local receptors located within 500m of the EP boundary as shown on Drawing 003			
Unnamed	Deciduous Woodland	North	Adjacent
AO Recycling	Commercial/Industrial	South	Adjacent
Halesfield 15	Local Transport Network	South	Adjacent
Open Ground	Open Ground	East, South and West	Adjacent
Drain	Surface Water Feature	North	30
Unnamed	Deciduous Woodland	West	60

Receptor Name	Receptor Type	Direction from Site	Approximate Distance from Site Boundary at closest point (in metres)
Brockton Way (A442)	Local Transport Network	West	330
Greenwood Close	Residential	West	400
Cuckoo Oak Green	Residential	Northwest	480
John Randall Primary School	Educational	West	490
Dwelling	Residential	East	500
Ecology and Cultural and Natural Heritage identified within 1km of the EP boundary as shown on Drawing 003			
Madeley	Local Nature Reserve	Northwest	560
Unnamed	Ancient Woodland	Northeast	730
Unnamed	Ancient Woodland	Northeast	900

Figure 3-1 shows a wind rose from Shawbury Meteorological Station, located approximately 24km northwest, providing the frequency of wind speed and direction from 2018. The wind rose shows that winds from the south and west are most frequent. Winds from the north and east are less frequent.

Figure 3-1
Shawbury Meteorological Station, 2018



4.0 Environmental Risk Assessment

The following tables in this section assess the Site in terms of potential hazards posed, receptors and pathways, along with management and assessment of the identified risks.

The probability of exposure is the likelihood of the receptors being exposed to the hazard, and is defined as low, medium or high. These terms are qualified as follows;

- Low: exposure is unlikely, barriers in place to mitigate against exposure.
- Medium: exposure is fairly probable, barriers to exposure less controllable.
- High: exposure is probable, direct exposure likely with few barriers.

The methodology outlined in Section 1.1 of this report is the basis on which it is determined whether the proposed operations will lead to significant impacts on the surrounding environment. Where a conclusion of 'not significant' has been reached, it is proposed that the mitigation and management measures that will be in place at the Site will be sufficient to ensure that there will be no impact at the surrounding environment.

Table 4-1 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
Receipt of waste. Processing and storage of waste.	Receptors as identified in Table 3-2. See Drawing 003.	Air	<p>Waste accepted on Site will consist only of cardboard with no putrescible or readily degradable residues. All waste will arrive on Site in bales.</p> <p>All storage and treatment of waste will take place within the building.</p> <p>The building benefits from roller shutter doors that will remain closed unless a delivery is taking place. The doors will be opened to allow the fully enclosed delivery vehicle to enter the building. The doors will then be closed enabling all waste to be unloaded directly into the sealed building.</p> <p>Strict waste acceptance procedures will be adhered to, to ensure only permitted wastes are accepted on Site. If odorous waste is delivered to Site it will be segregated and removed at the earliest opportunity. It will then be re-loaded into a sealable container.</p> <p>The Site will be monitored for odours by Site personnel throughout each shift. If odours are detected, investigations will be undertaken to determine the cause and appropriate remedial action taken.</p> <p>The Site Manager will be responsible for implementing risk management measures in conjunction with the Operating Techniques (Ref: 416.11821.00001/OT).</p>	Very low	Odour Nuisance	Not significant

Table 4-2 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
Vehicle movements. Operation of fixed and mobile plant. Processing of waste.	Receptors as identified in Table 3-2. See Drawing 003.	Air	<p>The Site is located within an area dominated by industrial/commercial premises. The nearest residential receptor is located 400m west of the Site.</p> <p>All treatment of waste will occur within the building.</p> <p>Vehicle movements outside the building will be restricted during the night time period.</p> <p>Acoustic enclosures will be constructed around all shredders within the building. The enclosures will be constructed with a steel frame and rock wool board surrounded by iron.</p> <p>Speed limits will be implemented for vehicles using the Site and traffic calming measures will be implemented to enforce speed limits.</p> <p>Site access and operational areas will be maintained and repaired to minimise emissions of noise due to uneven and poor surfacing.</p> <p>If horns or alarms are deemed to cause unacceptably high levels of noise, alternative technologies will be explored and implemented.</p> <p>Plant will be selected & operated to minimise noise.</p> <p>Plant will be fitted with noise silencers where</p>	Low	Nuisance and health risk to human receptors during daytime hours.	Not significant

			<p>possible.</p> <p>All Site plant and machinery will be operated and maintained in accordance with manufacturer's specifications.</p> <p>Auditory inspections will be carried out daily and in response to complaints.</p> <p>The Site Manager will be responsible for implementing risk management measures in conjunction with the Operating Techniques (Ref: 416.11821.00001/OT).</p>			
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Table 4-3 Fugitive 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: Waste processing operations. Waste storage. Vehicle movements.	Receptors as identified in Table 3-2. See Drawing 003.	Air	The Site will be managed in accordance with the approved Dust Emission Management Plan (416.11821.00001/DEMP).	Medium	Dust nuisance	Not Significant - due to the comprehensive mitigation and management methods outlined in the Dust Emission management Plan
To Water						
Runoff from the Site	Surface water and groundwater	Land and surface water	All waste will be stored and treated on impermeable surfacing within the building. Water is not required for the operation of the treatment plant therefore there is no drainage network within the building. There will be no contaminated run off generated under normal operating conditions. Strict waste acceptance procedures will be in place to ensure that only approved waste materials will be accepted on Site.	Low – due to no drainage network within the building and the waste types accepted on Site.	Contamination of surrounding land and water	Not significant

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
			The Site Manager will be responsible for implementing risk management measures in conjunction with the Operating Techniques (Ref: 416.11821.00001/OT).			
Pests						
Birds, vermin and pests	Receptors as identified in Table 3-2. See Drawing 003.	Land and Air	Only carboard will be accepted onto Site which is not likely to attract birds, vermin and pests. All waste will be stored and treated on impermeable surfacing within the building. Waste acceptance procedures will ensure that only authorised wastes are accepted. In the unlikely event that birds, vermin or pests are identified on Site, a specialist pest control contractor will be employed to undertake measures to remove the animals from the Site. The Site Manager will be responsible for implementing risk management measures in conjunction with the Operating Techniques (Ref: 416.11821.00001/OT).	Low	Nuisance to human and commercial/industrial receptors	Not Significant
Mud/Litter						
Mud from vehicle movements.	Receptors as identified in Table 3-2. See Drawing	Land	The Site will benefit from good housekeeping and all areas of the Site will be cleaned on a daily basis. All vehicles and mobile plant leaving operational areas will be checked to ensure	Low	Mud on road, road safety	Not significant

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
	003.		<p>that they are clear of loose waste.</p> <p>Before leaving the Site, vehicles will be cleaned as necessary and checked to ensure that their load is secure.</p> <p>Daily visual inspection of the Site by the Site Manager will identify any problems associated with mud and debris which will be cleaned up as soon as possible. Where necessary road cleaning equipment will be deployed.</p> <p>The Site Manager will be responsible for implementing risk management measures in conjunction with the Operating Techniques (Ref: 416.11821.00001/OT).</p>			
Litter from waste	<p>Receptors as identified in Table 3-2.</p> <p>See Drawing 003.</p>	Air	<p>Waste acceptance procedures will ensure that only authorised wastes are accepted.</p> <p>The building benefits from roller shutter doors that will remain closed unless a delivery is taking place. The doors will be opened to allow the fully enclosed delivery vehicle to enter the building. The doors will then be closed enabling all waste to be unloaded directly into the sealed building, minimising the risk of airborne litter being generated.</p> <p>All waste treatment will occur within the building.</p> <p>All waste will be stored within the building.</p>	Low	Nuisance from litter	Not significant

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
			<p>Vehicles will be sheeted or enclosed where possible.</p> <p>The Site and its immediate surrounding will be inspected daily, and action will be taken to maintain the area free of significant accumulations of litter and debris.</p> <p>Any excessive litter material at the Site or on the highways will be cleared using a mechanical sweeper and/or litter picker if required.</p> <p>The Site Manager will be responsible for implementing risk management measures in conjunction with the Operating Techniques (Ref: 416.11821.00001/OT).</p>			

Table 4-4 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 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
Spillage and Leakage	Local land quality, surface water and groundwater	Runoff and percolation through ground	<p>Tanks used for the storage of diesel will be stored within a bunded area bund capable of containing at least 110% of the volume of the largest container within the bund or 25% of the total tank volume within the bund, whichever is the greater. Bunds will be inspected visually on a daily basis by the Site staff to ensure their continued integrity and to identify the requirement for any remedial action.</p> <p>All liquids will be stored on impermeable surfacing in the locations illustrated on Drawing 004.</p> <p>There is no drainage network associated with the waste operation areas on site.</p> <p>Materials suitable for absorbing and containing minor spillages will be maintained on Site. Minor spillages will be cleaned up immediately, using sand or proprietary absorbent to clean up liquids and placed in alternative containers.</p> <p>Site staff will undertake daily monitoring for evidence of spillage and leakage.</p> <p>In the event of a major spillage immediate action will be taken to contain the spillage and prevent liquid from entering surface water drains and the</p>	Low	Contamination of land, groundwater and surface water	Not significant

			<p>unsurfaced ground. The spillage will be cleared immediately and placed in containers for off-site disposal and the EA will be notified.</p> <p>The Site Manager will be responsible for implementing risk management measures in conjunction with the Operating Techniques (Ref: 416.11821.00001/OT).</p>			
Fire	<p>Receptors as identified in Table 3-2.</p> <p>See Drawing 003.</p>	Air (smoke) Ground (spillages and firewater)	<p>The Site will be managed in accordance with the approved Fire Prevention Plan (416.11821.00001/FPP).</p>	Medium	Harm and nuisance	Not significant – due to the comprehensive mitigation and management methods outlined in the Fire Prevention Plan.
Vandalism and Security	Harm to Human Receptors, Ecological Receptors, Commercial/ industrial receptors, Land and Water	Land and air.	<p>The Site will benefit from the presence of staff 24 hours a day 7 days a week, due to continuous operations.</p> <p>Security on Site will include:</p> <ul style="list-style-type: none"> • Fencing surrounding the entirety of the Site; • Lockable entrance gates; • Security lighting; • CCTV covering full extent of the site; and • Lockable doors to all buildings on Site. <p>Security infrastructure including gates and fences will be inspected regularly by the operations staff to identify deterioration and the need for any repairs.</p> <p>In the event that damage is identified, unauthorised access will be prevented, and temporary repairs will be made by the end of the working day. Permanent repairs will be made as soon as practicable.</p> <p>All visitors to the Site will be required to register in</p>	Low	Theft, Plant failure, harm to human health	Not significant

			<p>the visitor's book and sign out again on exit. This minimises the risk of unauthorised visitors being present at the Site.</p> <p>The Site Manager will be responsible for implementing risk management measures in conjunction with the Operating Techniques (Ref: 416.11821.00001/OT).</p>			
Unauthorised Waste Acceptance	<p>Receptors as identified in Table 3-2.</p> <p>See Drawing 003.</p>	Air, Land	<p>Waste will be subject to strict waste acceptance procedures to identify, reject and/or segregate potentially non-conforming waste.</p> <p>Only waste authorised by the EP will be accepted at the Site.</p> <p>All wastes will be subject to inspection and checking against the declaration on the waste transfer note.</p> <p>If unauthorised waste is delivered to the Site, it will be segregated and stored in a designated quarantine area prior to export from Site.</p> <p>The Site Manager will be responsible for implementing risk management measures in conjunction with the Operating Techniques (Ref: 416.11821.00001/OT).</p>	Low	Nuisance, harm to human health	Not significant
Flooding	<p>Surface water, soils and groundwater</p> <p>Receptors as identified in Table 3-2.</p> <p>See Drawing 003.</p>	Flood waters over land	<p>The Site lies within a flood zone 1 and therefore has a low probability of flooding.</p> <p>The Site Manager will be responsible for implementing risk management measures in conjunction with the Operating Techniques (Ref: 416.11821.00001/OT).</p>	Very Low	Contaminated flood waters impacting land in residential, ecological and commercial/industrial areas	Negligible

5.0 Conclusion

This ERA has been undertaken in accordance with EA guidance. The assessment is provided as part of the application for an EP for the Harcourt Fiber Recycling Facility.

This qualitative risk assessment has considered odour, noise, fugitive emissions, dust, releases to water, litter, and potential for accidents and incidents. The assessment concludes that with the implementation of the risk management measures described above, potential hazards from the proposed development are not likely to be significant and no further assessment, other than those referenced in this report, is required.

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