CNC Recycling Limited

Habitats Management Plan

Unit 104-105
Greythorpe Industrial Estate
Hartlepool
TS25 2DF

Olive Compliance Ltd
Planet House
Northumbrian Way
Killingworth

Issue and revision record

Revision	Date	Originator	Description of changes
Vo.1 Initial draft	28/02/2025	Olive Compliance Ltd	New for permit application
Vo.2			
Vo.3			

Basis of Report

This report has been prepared by Olive Compliance Ltd with all reasonable skill, care and diligence, and taking account of the manpower and resources devoted to it by agreement with the client. Information reported herein is based on the interpretation of data collected and has been accepted in good faith as being accurate and valid.

This report is for the exclusive use of CNC Recycling Ltd, no warranties or guarantees are expressed or should be inferred by any third parties. This report may not be relied upon by other parties without written consent from Olive Compliance Ltd.

Olive Compliance Ltd disclaims any responsibility to the client and others in respect of any matters outside the agreed scope of the work.

Information reported herein may be based on the interpretation of public domain data collected by Olive Compliance Ltd, information supplied by the Client and its other advisors and associates. The data has been accepted in good faith as being accurate and valid.

CONTENTS

REFERENCED DRAWINGS

Drawing 001	Site Location Plan
Drawing 002	Receptor Map
Drawing 003	Site Layout Plan

Appendix A	Environmental Records Centre Data

1.0 Introduction

Olive Compliance Ltd (OCL) has been instructed by CNC Recycling Ltd to prepare a Habitats Management Plan (HMP) in support their Bespoke Permit Application.

The Habitat Management Plan is required as part of the permit application for consent of the Environmental Permit. It is overseen and is implemented by the operator.

There are four key aims set out in the Habitat Management Plan that are implemented through various aims and prescriptions:

- Safeguarding species diversity by ensuring minimal impacts from works taking place on site
- Mitigating for any negative effects to the adjacent SSSI,RAMSAR and SPA arising as a result of the change in site operations

The Environmental Risk assessment identified any significant risks and was used to demonstrate that the risk of pollution or harm will be acceptable by taking the appropriate measures to manage these risks.

Where the risks identified could be considered that they have the potential to impact on habitats then mitigation will be provided to remove or reduce any adverse effects 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 500m 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 Unit 104-105 Greythorpe Industrial Estate, Hartlepool,TS25 2DF.

The site is principally bounded by the site is principally bounded by industrial/commercial premises, located in a large established industrial estate Greythorpe Industrial Estate. The area has a mix of both industrial and waste operations within the area.

Waste operations proposed to be authorised by a bespoke environmental permit, is to accept plastic wastes only for the purposes of recovery and then recycling for the manufacturing process. The permit will allow the operator to store and process plastic waste with a limit of 74,999 tonnes per annum.

The site location and permitted area setting is shown on Drawings 001 and 002.

The site is principally bounded by commercial and industrial activities and residential areas.

Image 1- Surrounding Land Use

3.0 MANAGING RISKS IN RELATION TO HABITATS

3.1 Sensitivity of receptors

The H1 identified a number of sensitive receptors. The citation of the LWS includes supporting over wintering wildfowl birds.

Due to the presence of the grazing marsh and the nearness of the coastal, open waters and mudflats there is a high risk that wildfowl will use this area for feeding.

3.2 Control procedures

The site has planning condition that imposes a restriction of operation where no processing is permitted between November to February. This is as a result of consultations in regard to the LWS and protection to overwintering wildfowl.

The site has an Environmental Management System (EMS) and the relevant procedures that relate to protection of the sensitive receptors are detailed in tables 1.1,1.1, 1.3, & 1.4 above.

Appendix 3.14 DEMP

Appendix 3.11 OMP

Appendix 3.18 FPP

Habitats Management Plan (HMP)

The dust and emissions management plan provided controls that allow the site to operate with adequate controls in place to prevent deposition of dust on flora.

The odour management plan provided controls that allow the site to operate with adequate controls in place to prevent offensive odours effecting flora and local visitors and tourism in the area.

3.3 Habitat Management

As there are specific considerations in relation to the SSSI,SPA ,RAMSAR, coastal flood plain and grazing marshland and protected species and habitats relevant survey works would be undertaken prior to any major site changes or redevelopments.

There are two key aims set out in the Habitat Management Plan that are implemented through various aims and prescriptions:

- Mitigating for any negative effects to overwintering birds as a result of the site activities

4.0 Local Habitats and Description

Table 1 – Habitats and Descriptions

Details	Quadrant Reference (Compass Direction)	Estimated Distance from Site	Contact
National Nature Reserves Name: Teesmouth Multiple Areas: Y Total Area (m2): 3625243.52 Source: Natural England Reference: 1006937 Designation Date: Not Supplied	A9SW (SE)		Natural England Telephone: 0300 060 3900 Email: enquiries@naturalengland.org.uk Website: www.naturalengland.org.uk
Description: Harbour seals and grey seals bask beside the tidal channels. There are 4 different species of marsh orchid, and thousands of migratory waterbirds swooping down to feed on the mudflats. The reserve is split into 2 main sections. North Gare is an area of dunes and grazing marsh, the domain of lapwings and flocks of curlew. During winter this is the domain of lapwings and flocks of curlew, which stalk the pastures alongside the approach road, while short-eared owls hunt amongst the dune grasslands. Wild flowers can be seen in the spring and summer. including six different species of orchid. Seal Sands is one of the largest areas of intertidal mudflats on England's north-east coast. When the tide is out, hundreds of waders, including redshank and dunlin peck through the mud.			

The colony of harbour seals haul out on the sand banks at low tide; their pups are born here each summer, making Seal Sands the only regular breeding colony of these animals on England's north-east coast.			
Ramsar Sites Name: Teesmouth And Cleveland Coast Multiple Areas: Y Total Area (m2): 12537569.88 Source: Natural England Reference: UK11068	A14SW (E)	391m	Natural England Telephone: 0300 060 3900 Email: enquiries@naturalengland.org.uk Website: www.naturalengland.org.uk
Status of Ramsar site: Teesmouth and Cleveland Coast was first designated as a Ramsar site on 15 August 1995. On 31 March 2000, the Ramsar site was extended to include additional areas and intertidal habitats. The Ramsar site has been extended in 2020 to include additional terrestrial areas within the Tees estuary and along the foreshore to the north and south because of the site's international importance for waterbirds. Site description: The Teesmouth and Cleveland Coast Ramsar site is a wetland of international importance, comprising intertidal sand and mudflats, rocky shore, saltmarsh, freshwater marsh and sand dunes. Large numbers of waterbirds feed and roost on the site in winter and during passage periods. In addition, the site is internationally important for its populations of red knot Calidris canutus, common redshank Tringa totanus and Sandwich tern Thalasseus sandvicensis. Boundary of Ramsar site: The original Ramsar site boundary included parts of Teesmouth and Cleveland Coast SSSI. For the original and extended Ramsar boundary please refer to the site map. The extended area includes additional terrestrial wet grassland, saltmarsh, deep and shallow pools and intertidal areas for breeding and non-breeding birds.			
Sites of Special Scientific Interest Name: Teesmouth And Cleveland Coast Multiple Areas: Y Total Area (m2): 29643726.67 Source: Natural England Reference: 2000856 Designation Details: Site Of Special Scientific Interest Designation Date: 31st July 2018	A14SW (E)	376m	Natural England Telephone: 0300 060 3900 Email: enquiries@naturalengland.org.uk Website: www.naturalengland.org.uk

Description: Seaton Dunes and Common is an area of considerable importance for its flora, invertebrate fauna, and bird life. The range of habitats present include sandy, muddy and rocky foreshore, dunes, dune slacks and dune grassland, as well as relict saltmarsh, grazed freshwater marsh with dykes (known locally as fleets and stells) pools and seawalls. Marram grass Ammophila arenaria dominates the main dunes with large populations of sea lyme grass Elymus arenarius, sand couch Agropyron junceiforme and sea rocket Cakile maritima on their seaward side. The dune flora is particularly rich and includes the nationally rare rush-leaved fescue Festuca juncifolia and sea couch Agrophyron pungens and its northernmost locality, as well as purple milk vetch Astragalus danicus, blue fleabane Erigeron acer and yellow wort Blackstonia perfoliata which have a limited distribution and are associated with the lime-rich slag of the dune covered sea walls. On the landward side of the dunes there is an extensive growth of sea buckthorn Hippophae rhamnoides and areas of dune slack supporting large populations of common spotted and marsh orchids Dactylorhiza spp. as well as their hybrids including several locally rare forms. The remainder of the site is primarily dune grassland and grazed freshwater marsh with associated fleets, stells, pools and seawalls dominated by various grasses, rushes and reeds with uncommon plants such as strawberry clover Trifolium fragiferum, wild celery Apium graveolens, knotted hedge parsley Torilis nodosa and adder's tongue fern Ophioglossum vulgatum. A small area of relict saltmarsh vegetation is present including stiff saltmarsh grass Puccinellia rupestris of local distribution throughout Britain.

Special Protection Areas Name: Teesmouth And Cleveland Coast Multiple Areas: Y Total Area (m2): 133652669.24 Source: Natural England Reference: UK9006061	A14SW (E)		Natural England Telephone: 0300 060 3900 Email: enquiries@naturalengland.org.uk Website: www.naturalengland.org.uk

The Teesmouth and Cleveland Coast Special Protection Area (SPA) is a 12 km² complex of coastal habitats centred on the Tees estuary. These include sandflats, mudflats, rocky foreshore, saltmarsh, sand dunes, wet grassland and freshwater lagoons. Together they support internationally important populations of breeding and non-breeding waterbirds. The SPA is a complex of discrete sites, with additional non-designated areas also used for foraging and roosting.

The SPA comprises of a wide variety of habitats including: intertidal sand and mudflats, rocky shore, saltmarsh, freshwater marsh, saline lagoons, sand dunes and estuarine and coastal waters on and around the Tees estuary, which has been considerably modified by human activities.

These habitats provide feeding and roosting opportunities for important number of waterbirds in winter and during passage periods including in particular common redshank, red knot and ruff, which occur in internationally important numbers. Freshwater and brackish pools also support breeding avocet during summer.

The saltmarsh and mudflat habitats of the Teesmouth and Cleveland Coast SPA are of great importance to a diverse assemblage of bird species. Mudflats support high densities of

benthic invertebrates, including worms, molluscs and crustaceans, which provide an important food resource for migrant and overwintering SPA bird species. Areas of saltmarsh provide significant feeding and roosting opportunities for many species of waterbird including common redshank and red knot.

In summer, little tern breed on the sandy beaches within the site and feed out at sea while the common tern, which breed at various locations, feed within the River Tees and associated water bodies and within the wider estuary mouth and bay. In late summer, Sandwich tern aggregate in important numbers at Coatham Sands, Seal Sands, North Gare Sands/Seaton Snook and Bran Sands when on passage.

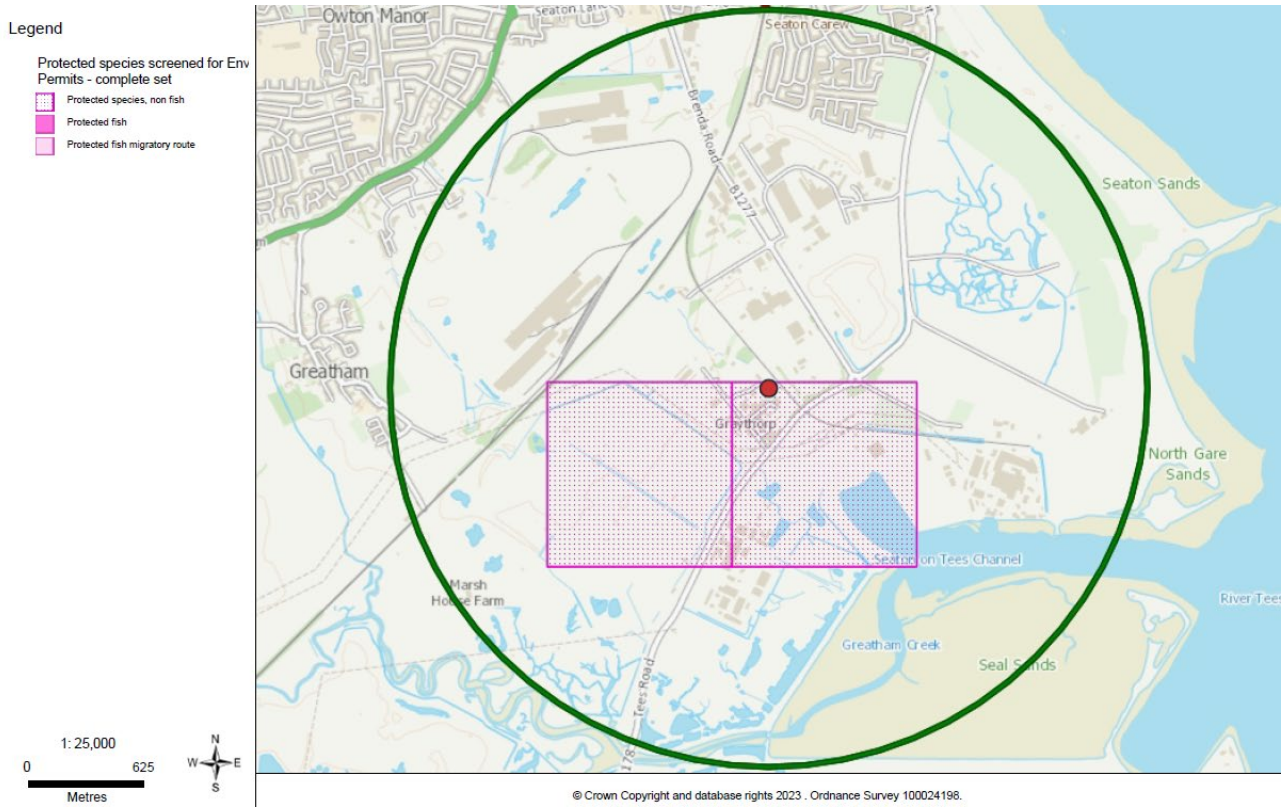
Local Nature Reserves Name: Seaton Dunes And Common Sssi Multiple Area: N Area (m2): 963472.7 Source: Natural England Designation Date: 1st February 1998	A14SW (E)		Natural England Telephone: 0300 060 3900 Email: enquiries@naturalengland.org.uk Website: www.naturalengland.org.uk

Description: Seaton Dunes and Common is an area of considerable importance for its flora, invertebrate fauna, and bird life. The range of habitats present include sandy, muddy and rocky foreshore, dunes, dune slacks and dune grassland, as well as relict saltmarsh, grazed freshwater marsh with dykes (known locally as fleets and stells) pools and seawalls. Marram grass Ammophila arenaria dominates the main dunes with large populations of sea lyme grass Elymus arenarius, sand couch Agropyron junceiforme and sea rocket Cakile maritima on their seaward side. The dune flora is particularly rich and includes the nationally rare rush-leaved fescue Festuca juncifolia and sea couch Agrophyron pungens and its northernmost locality, as well as purple milk vetch Astragalus danicus, blue fleabane Erigeron acer and yellow wort Blackstonia perfoliata which have a limited distribution and are associated with the lime-rich slag of the dune covered sea walls. On the landward side of the dunes there is an extensive growth of sea buckthorn Hippophae rhamnoides and areas of dune slack supporting large populations of common spotted and marsh orchids Dactylorhiza spp. as well as their hybrids including several locally rare forms. The remainder of the site is primarily dune grassland and grazed freshwater marsh with associated fleets, stells, pools and seawalls dominated by various grasses, rushes and reeds with uncommon plants such as strawberry clover Trifolium fragiferum, wild celery Apium graveolens, knotted hedge parsley Torilis nodosa and adder's tongue fern Ophioglossum vulgatum. A small area of relict saltmarsh vegetation is present including stiff saltmarsh grass Puccinellia rupestris of local distribution throughout Britain.

Protected Species Screening

EA screening has also identified a protected species (Code 2) European Water Vole located on the cusp of the site. See screening below.

Image 2 – Protected Species screening



Water voles are protected under the Wildlife and Countryside Act 1981. It is an offence to intentionally:

- kill, injure or take them
- possess or control them (alive or dead)
- It is also an offence to intentionally or recklessly:
- damage or destroy a structure or place used for shelter or protection
- disturb them in a place used for shelter or protection
- obstruct access to a place used for shelter or protection

Water voles are also listed as rare and most threatened species under Section 41 of the Natural Environment and Rural Communities Act (2006).

In relation site construction and ongoing management, the Operator will maintain;

- vegetation management to maintain shelter and foraging resources
- managing the potential risks from increased human presence and pollution through monitoring and appropriate measures.
- water quality management to make sure it's maintained with no release to surface waters.

A separate Habitats Assessment has been produced to assess the risk to habitats and onsite controls.

Information forms the Environmental Records centre has also been used to support this Habitats Risk assessment (See Appendix A).

Table 1 – Habitats and Descriptions

Receptor	Distance	Receptor Assessment
Hartlepool power station cricket club	**987m**	Public/Amenity Impact
Hartlepool Power plant	**999m**	Public (Employees) / Industry Impact
Tees Road	**177m**	Transport Impact
Venator Chemical plant	**686m**	Public (Employees) / Industry Impact
Special Protection Area (pSPA or SPA) **Teesmouth and Cleveland Coast**	**Within 1000m**	Habitats/Public/Amenity Impact
Ramsar **Teesmouth and Cleveland Coast**	**Within 1000m**	Habitats/Public/Amenity Impact
Teesmouth and Cleveland Coast **Sites of Special Scientific Interest (SSSI)**	**Within 1000m**	Habitats/Public/Amenity Impact
Local Wildlife Sites (LWS) **Brenda Road Sewage Works**	**200m**	Habitats/Public/Amenity Impact

5.0 Habitats Environmental Risk Assessment

5.1 Overview and Approach

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

5.1.1 Identification of Hazards

The first step of an ERA is to consider and identify the risks posed to local habitats and species within 1km by the activities proposed for the 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*."

5.1.2 Identification of Receptors

This document and the ERA 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.

Using the information gathered from the stated sources, the receptors considered for assessment within the ERA are defined in Table 1.

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

5.1.3 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.

5.1.4 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.

5.1.5 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.

Feature		Details
Statutory and Non-statutory designated sites for Nature Conservation	Teesmouth and Cleveland SPA/Ramsar/SSSI is located approximately 865m west of the Site. It is located within the SSSI IRZ and does meet the criteria whereby Natural England would need to be consulted in relation to the potential impacts on statutory designated sites. There is considered to be no likely direct or indirect significant impacts upon birds which form a qualifying feature of any Statutory Designated Site.	
Habitats & Flora	Site located in a heavily industrial area, no development to the site required other than improvements to critical infrastructure such as concrete surfacing and drainage, which will be generally of negligible value to wildlife.	

Birds	Constraints & Opportunities The habitats on Site (most notably the field boundary features) provide negligible suitable nesting habitat and is unlikely to support breeding birds.
Otters	It is considered unlikely that otters are present within or immediately adjacent to the Site. No water courses within 300m of the site.
Water Vole	No water voles or signs of water voles were recorded on or immediately surrounding the Site and no watercourses are present within 300m of the Site. It is considered unlikely that water voles are present within or immediately adjacent to the Site.

Amphibians	Two water courses (minor tributaries) are also located within 300m and 500m of the Site, although due to isolation for further suitable habitat and the minimal suitability of ponds themselves, it is considered unlikely that amphibians are present immediately adjacent to the Site.
Invasive Non-native Species	N/A
Badgers	It is considered unlikely that otters are present within or immediately adjacent to the Site.

Seals	It is considered unlikely that seals are present within or immediately adjacent to the Site.

Table 3-1 HABITATS 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 and storage of waste	*Site personnel and local human population* *Local Nature Reserve and sensitive habitats / species* *Visitors / Volunteers*	Air	No putrescible or readily degradable wastes are to 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 odours, if required, by site personnel throughout the working day. In the event that odours are detected, investigations will be undertaken to determine the cause and appropriate remedial action taken. In the event that odorous waste is delivered to site it will be segregated & removed at the earliest opportunity.	Negligible	Odour nuisance and loss of amenity, habitat disruption	Not significant

			The Site Manager will be responsible for implementing risk management measures.			

Table 1-2 HABITAT 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 (site access road and yard) Noise from operation of site plant.	*Local Nature Reserves,SSSI,RAMSAR including habitats and protected species* *Over wintering birds*	Air.	The site is located within a mainly industrial area with both road and rail links within the 1km boundary. Waste treatment carried out on site, and deliveries will be conducted **will** only be carried out during operational hours. Weekend working is limited to Saturday 1pm. There is limited on site plant, which in betwee**n** waste deliverie**s** will be non-operational reducin**g** the impact on the diverse bird species and habitats. 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: • locating plant away from noise-sensitive receptors where possible;	Mobile. Intermittent throughout the day. Medium.	Noise nuisance and disruption to habitats and wildlife	Not significant

			• the avoidance of dropping materials from height; • switching plant off when not in use; • 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 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. 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.			

			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. The procedure for managing complaints is included in Section SOP 3.20 of the EMS. The management of noise emissions is detailed further in SOP 3.10 of the EMS.			

Table 1-3 HABITATS 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 Dusty wastes Waste deposition Waste surfaces	*Site personnel and local human population* *Birds* *Costal waters* *Flora*	Air	Due to the nature of the waste accepted at site, there is a potential for dust particles to be released as dust to air. All wastes will be stored in designated areas. Wastes are contained within secure bays with dust netting in pace around bays and the perimeter of the site, small stockpiles of waste reduce the impact of the loss of waste through windblown litter or from tipping or loading.	Low	Dust nuisance Harm to human health Disruption to natural habitats and nesting birds	Not significant

			Speed limits will be implemented for vehicles using the site. The storage of wastes on site benefits from concrete hardstanding throughout. Site surfacing is subject to a continuous maintenance programme of rolling repairs. Site access roads and operational areas will be maintained and repaired to minimise emissions of dust due to uneven and poor surfacing. 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. 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. 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. Dust &Emissions Management Plan as Appendix to SOP_3.14 The procedure for managing complaints is included in SOP 3.20 of the EMS.			
To Water						
Runoff from waste storage areas & site surfaces Percolation of contaminated water	Surface water: Groundwater within bedrock deposits. Receptors SSSI,SPA,RAMSAR,LWS Protected species	Overland percolation through the ground	The waste reception/treatment area of the site is falling towards drainage points where water enters an oil interceptor forming part of the site's sealed water drainage system. Only clean surface water will be discharged off site. All drains and gulleys are fitted with silt/plastic traps on gulleys and discharged to the three-stage oil interceptor.	Low	Contamination of surface waters and groundwater with impact on forna,amphibians,fish,birds,seals.	Not significant

			The site is located over 300m from any water course (tributaries) and approx. 800m from any significant water courses. All waste will be stored and treated on an impermeable surface to prevent contamination to groundwater. Strict waste acceptance procedures will ensure that only permitted waste types are accepted on site. In the event that non-conforming waste is delivered to site, it will be isolated contained and removed from site at the earliest opportunity. Fuels are stored inside a building in bunded tanks for secondary containment. Any refiling or vehicle maintenance will be carried out in this building. Therefore the risk of pollution is low, where source pathway receptor path is broken. The Site Manager will be responsible for implementing risk management measures.			
Pests						
Birds, vermin and insects.	*Site personnel and local human population* Receptors SSSI,SPA,RAMSAR,LWS	Via air (flies and birds) or over ground (vermin and birds).	Due to the nature of the wastes to be accepted at the site, it is not anticipated that pests will pose a risk at the facility. The facility will be inspected by both site management and operatives for infestations of pests, vermin and insects on a routine basis. A specialist pest control contractor will be deployed if required. The management of pests is further detailed in SOP 3.12 of the EMS.	Negligible	Nuisance, loss of amenity and harm to human health.	Not significant

Mud/Litter						
Litter from acceptance and storage of waste	Receptors SSSI,SPA,RAMSAR ,LWS Protected species/wildlife	Airborne litter	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 fence which will limit the potential for litter to escape off-site. 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. 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 SOP 3.13 of the EMS.	Low	Visual impact for Visitors/Tourism Suspension of dusts causing nuisance and loss of habitats	Not significant
Mud on roads	**Receptors SSSI,SPA,RAMSAR,LWS** **Visual impact for Visitors/Tourism**	Transferral of mud on vehicle wheels	The access **roads** and site **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; • all operational areas will be subject to monitoring by staff throughout the working day; and • all vehicles leaving operational	Low	Visual impact for Visitors/Tourism Suspension of dusts causing nuisance and loss of habitats	Not significant

			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: • 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.			

Table 1-4 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	*Local environment* Receptors SSSI,SPA,RAMSAR,LWS	Via air (odours and dust) Overland	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.	Low	Water contamination Odour and dust nuisance, loss of amenity , risk of contamination to land, water or	Not significant

		(to sewer, surface water and groundwater)	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 SOP 3.2 of the EMS. The Site Manager will be responsible for implementing risk management measures.		nuisance and loss of habitats	

Fire	Receptors SSSI,SPA,RAMSAR,LWS Habitats and Protected Species Visual impact for Visitors/Tourism Economic impact for businesses Visitors/Tourism	Air, water runoff	The Fire Prevention Plan is included in the site EMS. Low volumes on site and annual tonnage mitigate against the risk of a fire on site and the long term impact a fire could impact on air quality. 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. A brief summary of the measures which will be employed is as follows: • incompatible materials will not be accepted at the site; • the plant inspection schedule will include checks of electrical equipment within the site to ensure that any faults are identified and repaired; • 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 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	Low	Nuisance (smoke and fumes) and harm to habitats and health of birds , insects Water contamination (runoff) local water bodies (wetlands and coastal waters)	Not significant

			fire utilising the onsite fire extinguishers, if safe to do so; • Site drainage system to be isolated to prevent runoff to water courses; and • the site and buildings will be evacuated.			
Spillage and Leakage	Local land quality, surface water and groundwater. *Site personnel, emergency services personnel and local human population* Receptors SSSI,SPA,RAMSAR,LWS	Runoff and percolation through ground. Direct exposure and transport via air	To prevent loss of containment and minimise the risk and impact of releases the following measures will be implemented: 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; 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.	Low	Contamination of groundwater and surface water. Water contamination (runoff) local water bodies (wetlands and coastal waters)	Not significant

			Any dry wastes spilled on site will be collected and transported to the appropriate area of the site. 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 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. The spillage procedure, included in Section SOP 3.17 of the EMS, provides further information with respect to spillages on site.			
Security and Vandalism	Personnel on site, emergency service workers. Receptors SSSI,SPA,RAMSAR.LWS		The following security measures are in place: Site perimeter: the site benefits from a concrete perimeter wall; Security gates: the site entrance gate will be locked at all times when the facility is unattended and when the site is not in use; 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; 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; 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 to prevent any unauthorised access to the site and permanent repairs will be affected as soon as practicable;	Low	Nuisance and harm to human health. Contamination of land and surface waters, impacting on habitats Risk of arson and fire water/air quality	Not significant

			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.			
Flooding	**Receptors SSSI,SPA,RAMSAR,LWS**	Overland	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. Evacuation procedures will be implemented in the event of flooding but flooding in not expected to impact upon the site as it is elevated. Sandbags on site to conta**in** any water contaminated with wastes mixed with flood waters, the site is fully fenced and netted to contain large particles of waste, with the site fully concreted reducing source receptor**s** pathway to ground waters and local water courses, The Site Manager will be responsible for implementing risk management measures.	Low	Inundation of site with flood water **Contamination of land and surface waters which are habitats for birds,seals,fish,insects**	Not significant

6.0 MANAGING RISKS IN RELATION TO HABITATS

6.1 Sensitivity of receptors

The H1 identified a number of sensitive receptors. The citation of the LWS includes supporting over wintering wildfowl birds.

Due to the presence of the grazing marsh and the nearness of the coastal, open waters and mudflats there is a high risk that wildfowl will use this area for feeding.

6.2 Control procedures

The site has planning condition that imposes a restriction of operation where no processing is permitted between November to February. This is as a result of consultations in regard to the LWS and protection to overwintering wildfowl.

The site has an Environmental Management System (EMS) and the relevant procedures that relate to protection of the sensitive receptors are detailed in tables 1.1,1.1, 1.3, & 1.4 above.

Appendix 3.14 DEMP

Appendix 3.11 OMP

Appendix 3.18 FPP

Habitats Management Plan (HMP)

The dust and emissions management plan provided controls that allow the site to operate with adequate controls in place to prevent deposition of dust on flora.

The odour management plan provided controls that allow the site to operate with adequate controls in place to prevent offensive odours effecting flora and local visitors and tourism in the area.

6.3 Habitat Management

As there are specific considerations in relation to the SSSI,SPA ,RAMSAR, coastal flood plain and grazing marshland and protected species and habitats relevant survey works would be undertaken prior to major site changes or redevelopments.

The key aims set out in the Habitat Management Plan that are implemented through various aims and prescriptions:

- Mitigating for any negative effects to overwintering birds as a result of the site activities

7.0 Conclusion

This environmental risk assessment has been undertaken in the spirit of the withdrawn regulatory guidance EPR H1[1]. The assessment is provided as part of the application for an environmental permit application for CNC.

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 activities are not likely to be significant and no further assessment is required.

[1] Horizontal Guidance Note H1 – Environmental Risk Assessment for permits, (withdrawn 2016)