Environmental Risk Assessment

Prepared on Behalf of:

Luton Metal Recycling Limited

The Railway Arches

Colindeep Lane

Colindale

NW9 6HD

Environmental Permit:

YP3691NW

DOCUMENT CONTROL SHEET

Site:	**Luton Metal Recycling Limited**
Project:	**Bespoke Permit Variation Application**
Title	**Environmental Risk Assessment**
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1. Introduction

1.1.1 This Environmental Risk Assessment (RA) has been produced on behalf of Luton Metal Recycling Limited (the applicant), in line with current Environment Agency guidance, 'Risk Assessment for your Environmental Permit' available on Gov.uk, to support an application for a new bespoke environmental permit for a Waste operation under the Environmental Permitting (England and Wales) Regulations 2016 (as amended).

1.1.2 Application Proposals:

- Retain all treatment activities as detailed on the current permit for the Metal Recycling activities, however the site no longer requires the ELV AFT Activities with the revised Permit.
- Retain all EWC Codes associated with the metallic wastes from the depollution of ELV's (excluding 16 01 04*).
- Retain the current maximum tonnage currently permitted to 30,000 tonnes per annum, which will cover both the MRS & WEEE ATF activities (i.e., no intensification of the operation).
- Authorise the acceptance, treatment and storage of Waste Electrical Equipment (Non-Hazardous WEEE LDA Wastes); which will include the sorting, dismantling, separation, shredding, screening, grading, baling, shearing, compacting, crushing, granulation, repair or refurbishment, cutting of waste for recovery.
- Authorise the acceptance, treatment and storage of Waste Electrical Equipment (Hazardous WEEE); which will include the sorting, dismantling, separation, shredding, screening, grading, baling, shearing, compacting, crushing, granulation, repair or refurbishment, cutting of waste for recovery. (excluding WEEE Wastes containing CFC's that will be stored only).
- Update the lists of EWC Codes which will include 17 04 10* (waste cables only).
- Authorise the acceptance and stored of pressuirsed canisters only (no treatment of pressuirsed canisters is proposed).
- Modify the Metal Activities to include shredding activities.
- Modify the EWC Codes for the Metal Activities to include 17 09 04/19 12 12/20 03 01 (Limited to window frames containing steel/aluminium only).

1.2 Environmental Risk Assessment Scope

1.2.1 This Environmental Risk Assessment has been produced in response to a request from the Environment Agency during the pre-application screening request in relation to the application.

1.3 Environmental Risk Assessment Aims

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

2. Site Setting

2.1 Location

2.1.1 The site is located within an isolated setting, with numerous commercial, industrial activities being undertaken within the wider industrial/commercial area.

2.2 Designated Environmentally Sensitive Sites

2.2.1 There are no European Designated Sites such as Ramsar, Protection Areas, Biosphere Reserve, Special Areas of Conservations and Local Nature Reserves within 1000 metres of the site. However, the Inner Brent Reservoir SSSI is within 1000 metres (900 metres) of the site. Furthermore, the site is within AQMA designations for PM10 & NO2 as evidenced in Figure 2 overleaf.

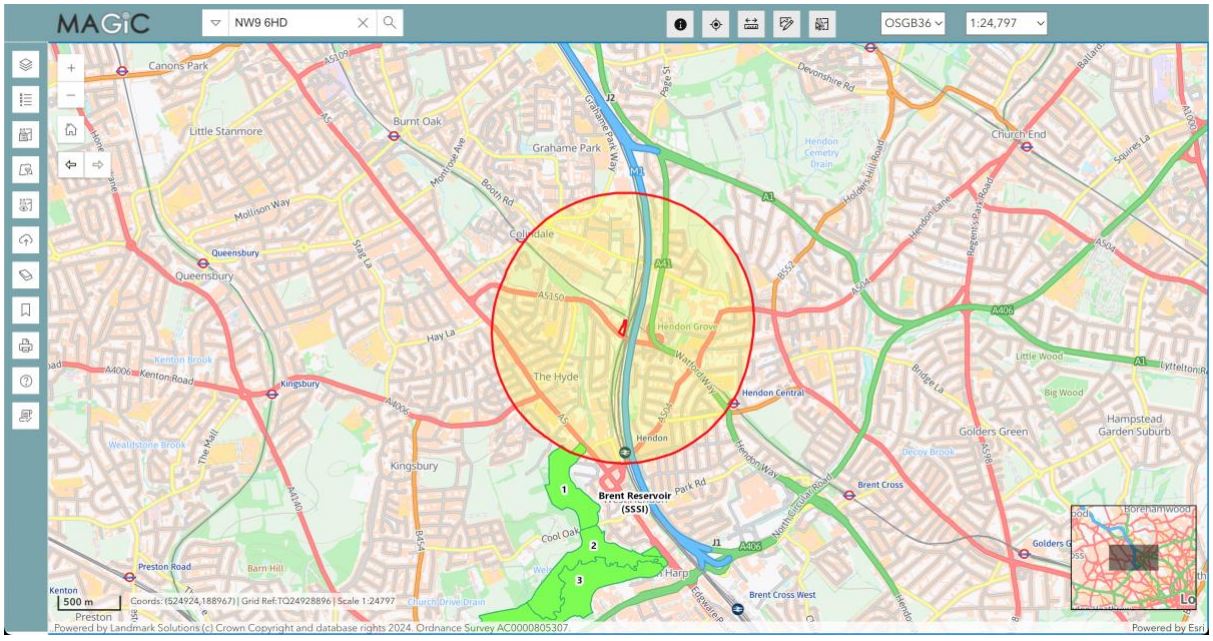


Figure 1: Map Showing Proposed Application Site & 1000 Metre Screening Buffer (Magic Interactive Tool)

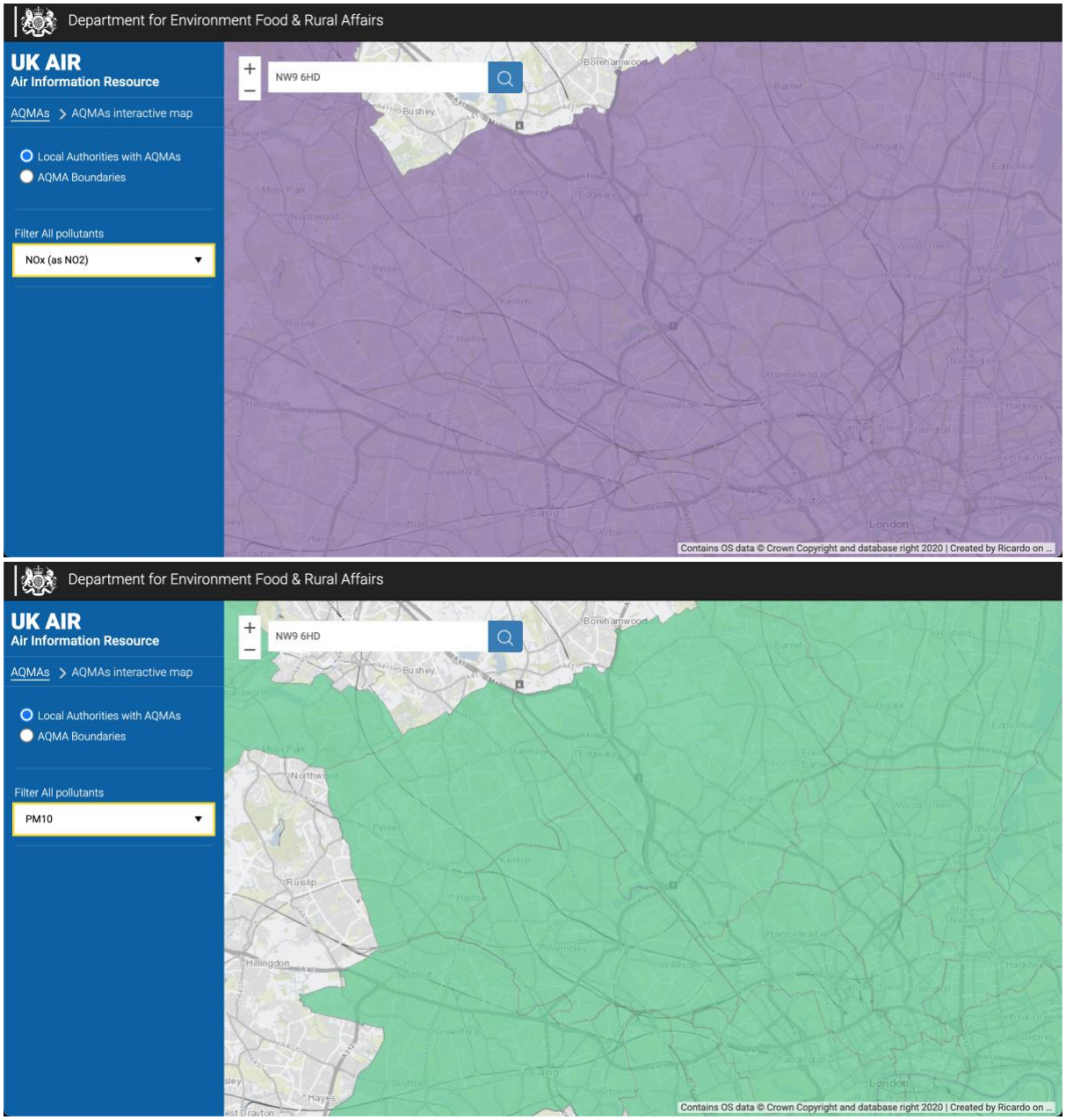


Figure 2: Application Site in Relation to Air Quality Management Designations.

2.3 Hydrogeology Aquifer Designation Map (Bedrock)

2.3.1 The application site falls with an area designated as a London Clay Formation.



Figure 3: Magic Interactive Tool Bedrock Designations

2.4 Hydrogeology Aquifer Designation Map (Superficial)

2.4.1 The application site falls doesn't fall within a designation.

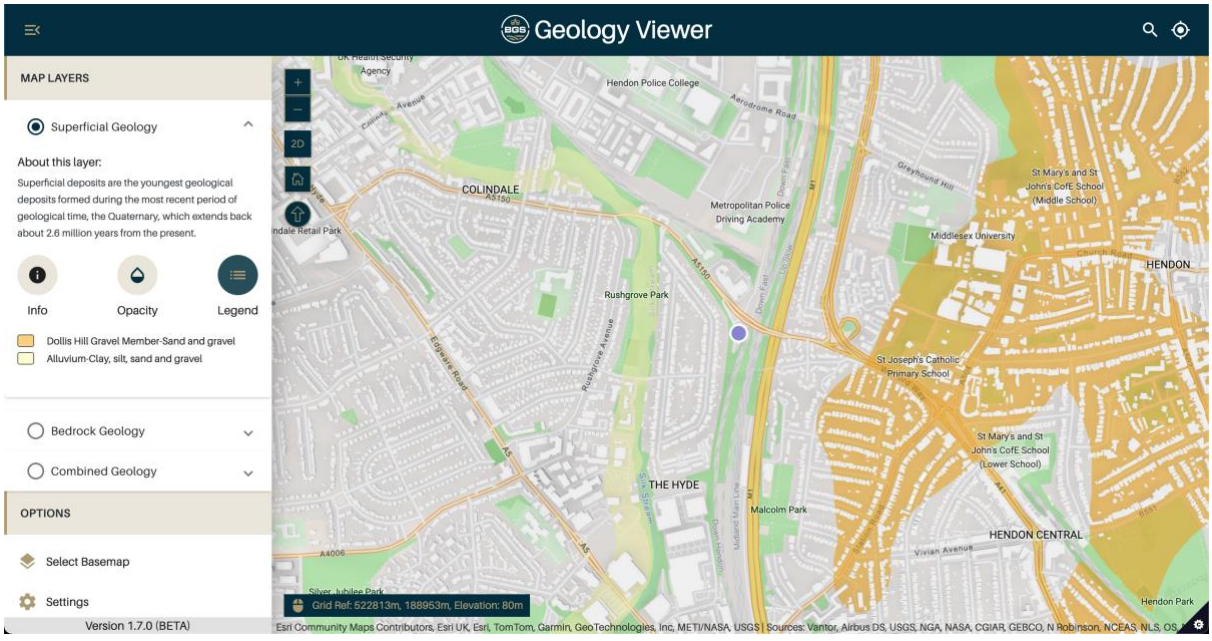


Figure 4: Magic Interactive Tool Hydrogeology Aquifer Superficial Designations

2.5 Groundwater Source Protection Zones

2.5.1 The proposed application site does not fall within a Groundwater Source Protection Zone.

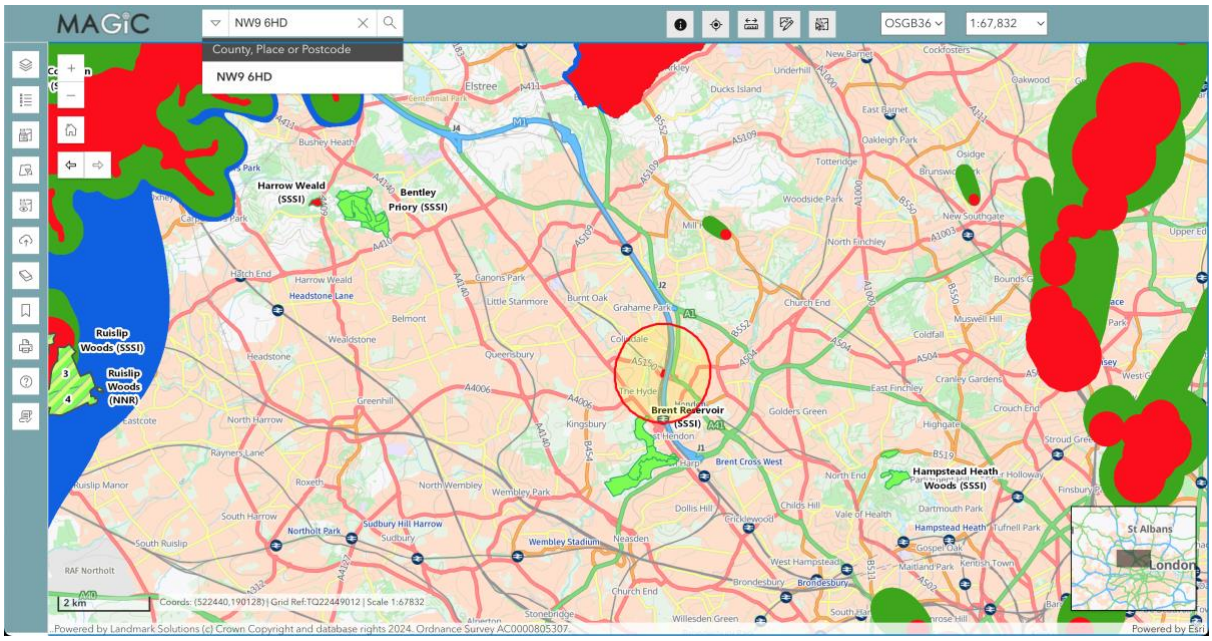


Figure 5: Magic Interactive Tool GPZ Designations

2.6 Flood Risk

2.6.1 The site falls outside of a flood zone.

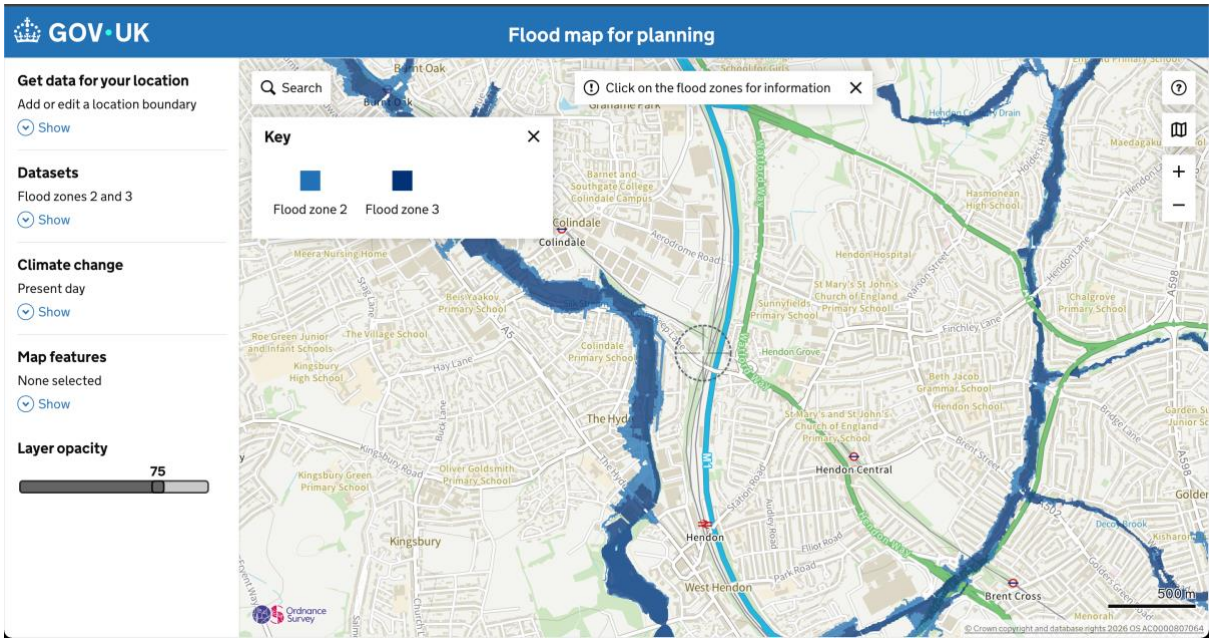


Figure 6: Flood Map For Planning

3. Methodology

3.1 Hazard Identification

3.1.1 A hazard is something with potential to cause harm to something else.

3.2 Receptors

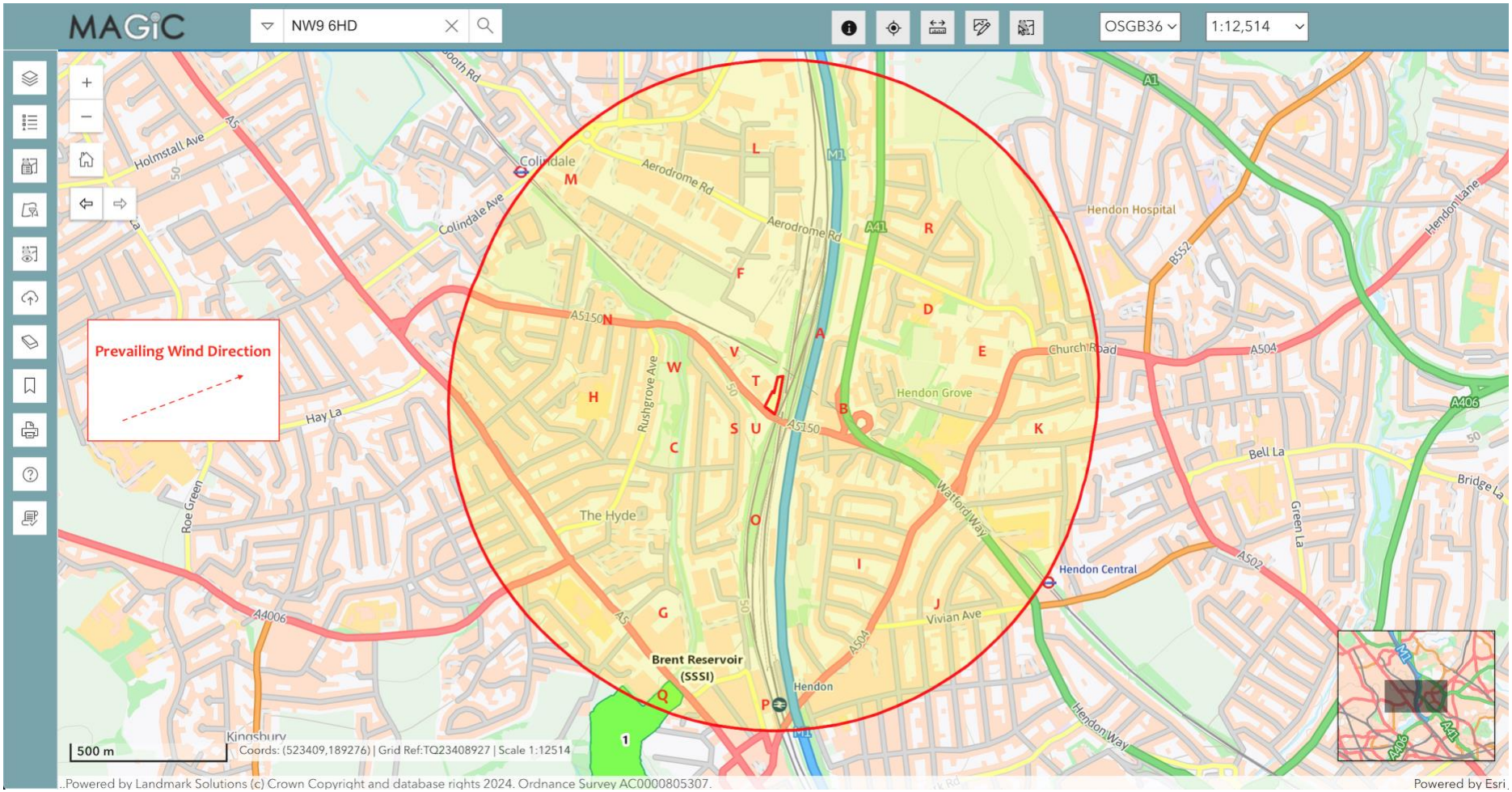
3.2.1 A receptor is the object (e.g., person, organism, resource or property) impacted by a hazard. When identifying receptors which may be at risk from the site, the following have ben considered:

- Deciduous Woodland;
- Priority Habitats;
- Locations used to grow food or to farm animals or fish;
- Drain and sewer system;
- Factories and other businesses;
- Fields and allotments used to grow food;
- Roads and railways;
- Groundwater beneath the site;
- Residential Dwellings;
- Regionally important geological sites;
- Schools, hospitals and other public buildings;
- Conservation and habitat protected areas;
- Water; and
- Playing fields and playgrounds.

3.2.2 Based on the assessment of the site setting presented in Section 2 of this Environmental Risk Assessment, the following principal receptors have been identified for assessment as presented in Figure 4 & detailed in Table 2 overleaf.

Table 1: Possible Receptors, Distance & Direction from Proposed Operation

Receptor Reference	Receptor Description	Approximate Distance From Site Boundary (Metres)	Direction
A	M1 Motorway	50	East
B	Watford Way Road Infrastructure	208	East
C	River Brent	344	Southwest
D	Sunny Fields Primary School	536	Northeast
E	Middlesex University	652	Northeast
F	Commercial/Industrial Activities	385	Northwest
G	Commercial/Industrial Activities	771	Southwest
H	Colindale Primary School	551	West
I	Residential	562	Southeast
J	Residential	779	Southeast
K	Residential	898	East
L	Commercial/Industrial Activities	816	North
M	Barnet & Southgate College	941	Northwest
N	Colindeep Lane Road Infrastructure	554	Northwest
O	Railway Network	94	South
P	Hendon Train Station	941	South
Q	Brent Reservoir SSSI	900	Southwest
R	Residential	744	Northeast
S	Residential	100	Southwest
T	Commercial/Industrial Activities	25	West
U	Commercial/Industrial Activities	69	Southwest
V	Grammar School	162	Northwest
W	Rushgate Paradise Playground	275	West



<u>Figure 7:</u> Possible Receptors Identified within 1000m of the Application Site (Magic)

3.3 Pathways

Table 2: Pathways

Receptor	Hazard	Pathway
Humans & Property	Odour	Transmitted through the air
	Dust and Particular Matter	Transmitted through the air
	Noise & Vibration	Transmitted through the air/ground
	Birds, Vermin & Insects	Physical travel
	Fire	Physical contact and spread
Groundwater	Contaminated Runoff	Infiltration through the ground
Surface Water	Contaminated Runoff	Direct discharge from site
Protected Conservation Sites	Dust and Particular Matter	Transmitted through the air
	Noise & Vibration	Transmitted through the air/ground.
	Fire	Physical contact and spread
Atmosphere	Dust and Particular Matter	Transmitted through the air

3.4 Risk

3.4.1 Assessment of risk is based on the probability of receptor exposure to the identified hazards and the consequence of exposure. The initial assessment of risk is made assuming no risk management practices with the proposed mitigation measures & management practices being factored into the overall assessment of the proposed operation resulting in a residual risk level.

4. Fugitive Emissions to Air

Hazard	Source	Pathway	Receptor	Probability of Exposure	Consequence	Magnitude of Risk	Risk Management	Residual Risk
Release of Particulate Matter (Dusts)	Dust from Delivery of Wastes	Air Transportation then inhalation	Local Human Population, Adjacent Industrial/ Commercial Activities Workforce & Sensitive Receptors as identified in Table 2 above.	Low	Low	Medium	Vehicles are sheeted during the transportation of all waste materials to the proposed site. See separately submitted Environmental Management System (Dust Emissions Management Procedures). Dust Suppression equipment utilised to limit dust emissions (as deemed necessary).	Very Low
	Dust from Deposit of Wastes	Air Transportation then inhalation	Local Human Population, Adjacent Industrial/ Commercial Activities Workforce & Sensitive Receptors as identified in Table 2 above.	Low	Low	Medium	Wastes are deposited within the confines of the site perimeter benefitting from an enclosed site perimeter (concrete/metal retaining walls). See separately submitted Environmental Management System (Dust Emissions Management Procedures). Dust Suppression equipment utilised to limit dust emissions (as deemed necessary). Wind conditions will be monitored & Operations may cease until conditions improve.	Very Low
	Dust from Processing	Air Transportation	Local Human Population, Adjacent	Low	Low	Medium	Processing of materials conducted within the confines of an enclosed site perimeter	Very Low

	of Wastes	then inhalation	Industrial/ Commercial Activities Workforce & Sensitive Receptors as identified in Table 2 above.				(concrete/metal retaining walls). It is not anticipated that the processing of metals will generate dusts. See separately submitted Environmental Management System (Dust Emissions Management Procedures). Dust Suppression equipment utilised to limit dust emissions (as deemed necessary). Wind conditions will be monitored.	
	Dust from Storage of Waste	Air Transportation then inhalation	Local Human Population, Adjacent Industrial/ Commercial Activities Workforce & Sensitive Receptors as identified in Table 2 above.	Low	Low	Medium	Wastes stored within designated containers/bays/areas, which the site benefitting from an enclosed site perimeter (concrete/metal retaining walls). Ongoing monitoring of material stockpiles throughout the working day. See separately submitted Environmental Management System (Dust Emissions Management Procedures). Dust Suppression equipment utilised to limit dust emissions (as deemed necessary). Wind conditions will be monitored.	Very Low
	Dust from Loading of Wastes	Air Transportation then inhalation	Local Human Population, Adjacent Industrial/ Commercial Activities Workforce &	Low	Low	Medium	Loading of materials conducted within the confines of the site perimeter benefitting from an enclosed site perimeter (concrete/metal retaining walls). Materials are placed within removal vehicles and not dropped from a height.	Very Low

			Sensitive Receptors as identified in Table 2 above.				See separately submitted Environmental Management System (Dust Emissions Management Procedures). Dust Suppression equipment utilised to limit dust emissions (as deemed necessary). Wind conditions will be monitored.	
	Dust from Track Out	Air Transportation then inhalation	Local Human Population, Adjacent Industrial/ Commercial Activities Workforce & Sensitive Receptors as identified in Table 2 above.	Low	Low	Medium	Surface cleaned/tidied on a regular basis to prevent the build-up of particulates on the site surfacing. Vehicles wheels inspected and washed if dust is present. See separately submitted Environmental Management System. Wind conditions will be monitored.	Very Low
Release of Particulate Matter (Smoke & Particulates)	Smoke & Particulates from a Fire arising onsite.	Air Transportation then inhalation	Local Human Population, Adjacent Industrial/ Commercial Activities Workforce & Sensitive Receptors as identified in Table 2 above.	Low	Low	Medium	See separately submitted Fire Prevention Plan for onsite arrangements for the management of a fire onsite to prevent fires. See separately submitted Environmental Management System for onsite arrangements for the management of the site to ensure compliance with the Environmental Permit. Enclosed site perimeter (concrete/metal retaining walls). Wind conditions will be monitored & Operations may cease until conditions improve.	Low

Release of Particulate Matter (Dusts) (Non-Hazardous WEEE Processing)	Dust from Processing of Wastes	Air Transportation then inhalation	Local Human Population, Adjacent Industrial/ Commercial Activities Workforce & Sensitive Receptors as identified in Table 2 above.	Low	Low	Medium	Processing of materials conducted within the confines of an enclosed site perimeter (concrete/metal retaining walls). It is not anticipated that the processing of metals will generate dusts, as well as the fact that materials will be contained within the processing equipment during the treatment cycle. See separately submitted Environmental Management System (Dust Emissions Management Procedures). Dust Suppression equipment utilised to limit dust emissions (as deemed necessary). Wind conditions will be monitored.	Low
Release of Particulate Matter (Dusts) (Hazardous WEEE Storage)	Dust from storage of Wastes	Air Transportation then inhalation	Local Human Population, Adjacent Industrial/ Commercial Activities Workforce & Sensitive Receptors as identified in Table 2 above.	Low	Low	Medium	Wastes stored within designated containers/bays/areas, which the site benefitting from an enclosed site perimeter (concrete/metal retaining walls). Ongoing monitoring of material stockpiles throughout the working day. See separately submitted Environmental Management System (Dust Emissions Management Procedures). Dust Suppression equipment utilised to limit dust emissions (as deemed necessary). Wind conditions will be monitored.	Low

5. Noise & Vibration

Hazard	Source	Pathway	Receptor	Probability of Exposure	Consequence	Magnitude of Risk	Risk Management	Residual Risk
Noise & Vibrations from Vehicle Movements & onsite activities	Noise from Site Operation	Noise through the air and vibration through the ground	Local Human Population, Adjacent Industrial/ Commercial Activities Workforce & Sensitive Receptors as identified in Table 2 above.	Low	Medium	Medium	No engine idling is permitted onsite; all engines are turned off whilst waiting to tip. Relevant plant and equipment will be fitted with appropriate sound attenuation and acoustic isolation and will be subject to regular inspection and maintenance schedules to maintain operational performance. Noise emissions are not considered to be a potential issue due to the isolated nature of the operation. Any plant vibration issue will be resolved during the plant-commissioning period. See separately submitted Environmental Management System (Noise Emissions Management Procedures). Operatives are trained in noise management and the prompt reporting of any abnormal noise so that it can be rectified.	Very Low
	Noise from Delivery of Wastes (i.e., Vehicle Movements)	Noise through the air and vibration through the ground	Local Human Population, Adjacent Industrial/ Commercial Activities Workforce & Sensitive	Low	Medium	Medium	All vehicles have silencing equipment fitted as standard, which are regularly serviced and have daily defect checks completed by drivers. Noise emissions are not considered to be a potential issue due to the isolated nature of the operation.	Very Low

			Receptors as identified in Table 2 above.				As required by law, in order to hold an Operator's License, all vehicles undergo a safety inspection, including exhaust and silencer check, every 6 weeks (PMI). Vehicles are fitted with working exhaust silencing equipment. 10mph speed limit enforced onsite; anyone speeding will be subject to disciplinary action. No engine idling is permitted onsite; all engines are turned off whilst waiting to tip. Relevant plant and equipment will be fitted with appropriate sound attenuation and acoustic isolation and will be subject to regular inspection and maintenance schedules to maintain operational performance. Any plant vibration issue will be resolved during the plant-commissioning period. See separately submitted Environmental Management System (Noise Emissions Management Procedures). Operatives are trained in noise management and the prompt reporting of any abnormal noise so that it can be rectified.	
	Noise from Deposit of Wastes	Noise through the air and vibration through the ground	Local Human Population, Adjacent Industrial/ Commercial Activities	Low	Medium	Medium	All vehicles have silencing equipment fitted as standard, which are regularly serviced and have daily defect checks completed by drivers. Noise emissions are not considered to be a potential issue due to the isolated nature of	Very Low

			Workforce & Sensitive Receptors as identified in Table 2 above.				the operation. As required by law, in order to hold an Operator's License, all vehicles undergo a safety inspection, including exhaust and silencer check, every 6 weeks (PMI). Vehicles are fitted with working exhaust silencing equipment. 10mph speed limit enforced onsite; anyone speeding will be subject to disciplinary action. All transport arrangements managed by the transport manager and only one vehicle will unload in an area at a time. The site perimeter benefits from an enclosed site perimeter acting as physical barriers. No engine idling is permitted onsite; all engines are turned off whilst waiting to tip. Relevant plant and equipment will be fitted with appropriate sound attenuation and acoustic isolation and will be subject to regular inspection and maintenance schedules to maintain operational performance. Any plant vibration issue will be resolved during the plant-commissioning period. See separately submitted Environmental Management System (Noise Emissions Management Procedures).	

							Wind conditions will be monitored & Operations may cease until conditions improve. Operatives are trained in noise management and the prompt reporting of any abnormal noise so that it can be rectified.	
	Noise from Processing of Wastes	Noise through the air and vibration through the ground	Local Human Population, Adjacent Industrial/ Commercial Activities Workforce & Sensitive Receptors as identified in Table 2 above.	Low	Medium	Medium	Processing of materials conducted within the confines of the site perimeter. Noise emissions are not considered to be a potential issue due to the isolated nature of the operation. All Equipment/Machinery have daily defect checks completed by operators, with all defects reported to senior management for rectification. Relevant plant and equipment will be fitted with appropriate sound attenuation and acoustic isolation and will be subject to regular inspection and maintenance schedules to maintain operational performance. Any plant vibration issue will be resolved during the plant-commissioning period. See separately submitted Environmental Management System (Noise Emissions Management Procedures). Operatives are trained in noise management and the prompt reporting of	Very Low

							any abnormal noise so that it can be rectified.	
	Noise from Loading of Wastes	Noise through the air and vibration through the ground	Local Human Population, Adjacent Industrial/ Commercial Activities Workforce & Sensitive Receptors as identified in Table 2 above.	Low	Medium	Medium	Loading of materials conducted within the confines of the site perimeter benefitting from an enclosed site perimeter acting as physical barriers. Noise emissions are not considered to be a potential issue due to the isolated nature of the operation. Materials are placed within removal vehicles and not dropped from a height. Reducing the potential impact of noise & vibration. Revving of grabs/wheeled loaders engines when loading will be kept to a minimum. Walkie-talkie communication will be kept to a low volume. When not in use all operational equipment is switched off not left idling. See separately submitted Environmental Management System (Noise Emissions Management Procedures). Wind conditions will be monitored. Operatives are trained in noise management and the prompt reporting of any abnormal noise so that it can be rectified.	Very Low

6. Odour

Hazard	Source	Pathway	Receptor	Probability of Exposure	Consequence	Magnitude of Risk	Risk Management	Residual Risk
Release of Particulate Matter (Odours)	Odour from Delivery of Wastes	Air Transportation then inhalation	Local Human Population, Adjacent Industrial/ Commercial Activities Workforce & Sensitive Receptors as identified in Table 2 above.	Medium	Medium	Medium	Vehicles are sheeted/covered during the transportation of all waste materials to the proposed site. Odorous wastes not accepted at the site.. See separately submitted Environmental Management System (Odour Emissions Management Procedures). Wind conditions will be monitored & Operations may cease until conditions improve.	Very Low
	Odour from Deposit of Wastes	Air Transportation then inhalation	Local Human Population, Adjacent Industrial/ Commercial Activities Workforce & Sensitive Receptors as identified in Table 2 above.	Medium	Medium	Medium	Odorous wastes not accepted at the site, strict waste acceptance procedures in place and only metal wastes accepted. See separately submitted Environmental Management System (Odour Emissions Management Procedures).	Very Low
	Odour from Processing of Wastes	Air Transportation then inhalation	Local Human Population, Adjacent Industrial/ Commercial Activities Workforce &	Medium	Medium	Medium	Odorous wastes not accepted at the site See separately submitted Environmental Management System (Odour Emissions Management Procedures).	Very Low

			Sensitive Receptors as identified in Table 2 above.					
	Odour from Storage of Waste	Air Transportation then inhalation	Local Human Population, Adjacent Industrial/ Commercial Activities Workforce & Sensitive Receptors as identified in Table 2 above.	Medium	Medium	Medium	Odorous wastes not accepted at the site. See separately submitted Environmental Management System (Odour Emissions Management Procedures).	Very Low
	Odour from Loading of Wastes	Air Transportation then inhalation	Local Human Population, Adjacent Industrial/ Commercial Activities Workforce & Sensitive Receptors as identified in Table 2 above.	Medium	Medium	Medium	Odorous wastes not accepted at the site. See separately submitted Environmental Management System (Odour Emissions Management Procedures).	Very Low

7. Litter

Hazard	Source	Pathway	Receptor	Probability of Exposure	Consequence	Magnitude of Risk	Risk Management	Residual Risk
Release of Litter	Litter Generated From Onsite Activities	Transport Through the Air & Over Land	Local Human Population, Adjacent Industrial/ Commercial Activities Workforce & Sensitive Receptors as identified in Table 2 above.	Low	Low	Low	The site will be carefully managed including good housekeeping procedures and regular checks will be made within and around the site for any litter/debris. Reaction time: Public highway immediately (within 1 hour of detection & within the permitted boundary by the end of the working day. Wastes are stored within designated containers/bays/areas around the site. Operatives are trained in Emissions Management Procedures. See separately submitted Environmental Management System Emissions Management Section Litter Procedures (Contingency Plan).	Low

8. Pests

Hazard	Source	Pathway	Receptor	Probability of Exposure	Consequence	Magnitude of Risk	Risk Management	Residual Risk
Pests (files, vermin, birds) attracted to waste material	Pests	Transport Through the Air & Over Land	Local Human Population, Adjacent Industrial/ Commercial Activities Workforce & Sensitive Receptors as identified in Table 2 above.	Low	Low	Low	Food waste prohibition notice, only metals accepted/managed onsite. Wastes will be rejected if any loads appear to have pest infestations. The site will be carefully managed including good housekeeping procedures and regular checks will be made within and around the site for any litter/debris to prevent the attraction of pests. Wastes are stored within designated containers/bays/areas. Operatives are trained in Emissions Management Procedures. See separately submitted Environmental Management System Emissions Management Section Pests Procedures (Contingency Plan).	Very Low

9. Fugitive Emissions to Water

Hazard	Source	Pathway	Receptor	Probability of Exposure	Consequence	Magnitude of Risk	Risk Management	Residual Risk
Contaminated Surface Water Run Off/Fire Water Run Off (Including surface water run off containing hazardous substances and POPS).	Contamination from Materials stored onsite	Percolation through soils, direct run off from site across the ground and entering surface water drains or natural channels/ ditches or groundwater	Local Human Population, Adjacent Industrial/ Commercial Activities Workforce & Sensitive Receptors as identified in Table 2 above.	Low	Medium	Medium	Senior Management inspects conditions of the impermeable concrete surfacing regularly & any noticeable deterioration is rectified as soon as practicable. Regular inspections of equipment/machinery/vehicles will identify leaks at the earliest possible convenience. Fuels/oils stored in bunded areas with a capacity to hold 110% of the largest containers capacity. See Fire Prevention Plan for the site's strategies in the event of a waste fire. Leakage/Spillage Procedure details in submitted Environmental Management System.	Low
Chemicals & Oils Stored Onsite	Loss of containment on site	Percolation through soils, direct run off from site across the ground and entering surface water drains or natural	Local Human Population, Adjacent Industrial/ Commercial Activities Workforce & Sensitive	Medium	Medium	Medium	Fuels/oils stored in bunded areas with a capacity to hold 110% of the largest containers capacity. Regular inspections of equipment/machinery/vehicles & the chemical storage areas will identify leaks at the earliest possible convenience.	Low

		channels/ ditches or groundwater	Receptors as identified in Table 2 above.				Impermeable concrete surface to drainage system, as well as being able to prevent discharge with the deployment of sandbags.	
Leakage & Spillage	Loss of containment on site	Percolation through soils, direct run off from site across the ground and entering surface water drains or natural channels/ ditches or groundwater	Local Human Population, Adjacent Industrial/ Commercial Activities Workforce & Sensitive Receptors as identified in Table 2 above.	Medium	Medium	Medium	Regular inspections of equipment/machinery/vehicles will identify leaks at the earliest possible convenience. Leakage/Spillage Procedure details in submitted Environmental Management System. Impermeable concrete surface to drainage system, as well as being able to prevent discharge with the deployment of sandbags.	Low

Contaminated Surface Water Run Off associated with the storage of hazardous WEEE Wastes/Pops Wastes.	Contamination from Materials stored/ handled onsite	Percolation through soils, direct run off from site across the ground and entering surface water drains or natural channels/ ditches or groundwater	Local Human Population, Adjacent Industrial/ Commercial Activities Workforce & Sensitive Receptors as identified in Table 2 above.	Low	Medium	Medium	Site benefits from an impermeable concrete surfacing with sealed drainage. Senior Management inspects conditions of impermeable concrete surfacing regularly & any noticeable deterioration is rectified as soon as practicable. Regular inspections of equipment/machinery/vehicles will identify leaks at the earliest possible convenience. Hazardous WEEE wastes stored within areas benefitting from a weatherproof covering. See Fire Prevention Plan for the site's strategies in the event of a waste fire.	Low

10. Habitats Risk Assessment Screening

Receptor	Screening Distance	Sensitive Characteristics & Reasons for Designation	Sensitivity Level	Sensitivity Assessment Through Embedded Mitigation	Residual Risk
SSSI Brent Reservoir	1000m	The Brent Reservoir is of interest primarily for breeding wetland birds and in particular for significant numbers of nesting great crested grebe. The diversity of wintering waterfowl and the variety of plant species growing along the water margin are also of special note for Greater London. Breeding birds of the swamp, fen and willow carr include reed and sedge warblers, reed bunting, redpoll and willow tit. The more secluded areas adjoining open water are the favoured nesting sites for waterfowl species. Coot, great crested grebe, little grebe, moorhen, mute swan, pochard, shoveler and tufted duck regularly breed and gadwall are normally resident during summer. The numbers of nesting great crested grebe are of special significance with recent marked increases making the colony the largest in Greater London and among the largest in Britain. Artificial raft islands anchored across the eastern reservoir arm attract another breeding species, common tern, and are used by waterfowl as loafing places. Further breeding species are recorded in the willow woodland, these include: bullfinch, greenfinch, jay, willow warbler and wren. The wetlands are also of interest for their plant communities. The swamps are characteristically dominated by a single species, mainly bulrush Typha latifolia and common reed Phragmites australis. In contrast the fen communities comprise a complex mixture of many wetland plants including: lesser pond-sedge Carex acutiformis, great willowherb Epilobium hirsutum, meadow-sweet Filipendula ulmaria, soft rush Juncus effusus, gypsywort Lycopus europaeus, water forget-me-not Myosotis scorpioides, reed canary-grass Phalaris arundinacea, branched bur-reed Sparganium erectum and marsh woundwort Stachys palustris. It is in this community type that most of the locally uncommon species are to be found, for example: water-plantain Alisma plantago-aquatica, flowering rush Butomus umbellatus, water dock Rumex hydrolapathum and lesser bulrush Typha angustifolia. **(Distance 900 metres)**	Medium	The residual impact associated with the proposed operation would be nominal, based on the following conclusions: • Effective Fire Prevention Plan, • Effective Environmental Management System; • Onsite controls including those specified in the above Environmental Management Documentation including the isolated nature of the operation and that the site benefits from an enclosed site perimeter (Concrete Walls) and adjacent buildings that will prevent the transmissions of any emissions beyond the site boundary; • Effective Emissions Management Procedures as detailed in the EMS. • Any particulates are non-toxic in nature, with numerous barriers between the site and receptor; • Concrete surfacing and a sealed drainage system. • Appropriate buffer zone between the identified receptors and onsite operations. • Proposed changes are not an intensification of operations as the tonnages have not been amended only an alteration to the current activities onsite. • Any emissions would be of such a diluted concentration to pose no impact on identified receptors.	Low

11. Conclusion

11.1.1 This Environmental Risk Assessment has been undertaken as described by the regulatory guidance. The assessment is provided as part of the application for a Bespoke Environmental Permit on behalf of Scrapco Metal Recycling Limited.

11.1.2 This qualitative risk assessment has considered fugitive emissions, noise & vibration, odour, litter, pests, fugitive emissions to water & habitats. The assessment concludes that with the implementation of the risk management measures described above & those contained in supplementary Fire Prevention Plan and the Environmental Management System Document the proposed licence modification is not likely to cause a significant environmental impact and no further assessment is required.