



Cymru Country Feeds

Environmental Permit Variation

Environmental Risk Assessment

November 2017

Prepared on behalf of 2Agriculture Limited



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1.0 Introduction

1.1 Report Context

1.1.1 This section of the Environmental Permit application corresponds to Section 6 of Part C2 of the Environmental Permit application form, and has been prepared on behalf of the Operator, 2Agriculture Limited, by WYG Environment Planning Transport Limited (WYG).

1.1.2 This Environmental Permit variation seeks to do the following:-

- Add an extruder plant with associated kit which will sit within the sites main building;
- Move the current wheel wash and vehicle wash out facilities to a new area to be included within the site; and
- Extend the existing site building into the area formally occupied by the wheel wash and vehicle washout – this will allow for the installation of the extruder plant.

1.1.3 This Environmental Risk Assessment is limited to a qualitative assessment of the potential risks to the environment and human health specifically related to the proposed activity. This report will identify any significant risk and demonstrate that the risk of pollution will be acceptable by taking the appropriate measures to manage the risk.



2.0 Environmental Risk Assessment

2.1 Methodology

2.1.1 This report has been prepared following Natural Resources Wales Risk Assessment guidance. It specifically relates to the potential risks associated with the following risk types:-

- Odour;
- Noise and vibration;
- Fugitive emissions; and
- Accidents and incidents.

2.1.2 The new extruder plant and the relocation of the current wheel wash and vehicle washout facilities will not generate any noise or vibration and therefore has not been considered in this risk assessment.

2.1.3 This risk assessment addresses the above, and is based on the following methodology:-

- Identification of potential sources of risk;
- Identification of all potential receptors to risk; and
- Risk assessment of each risk type.

2.1.4 The ERA is a tool used to identify the pollutant linkage i.e. source – pathway – receptor. For most risks, the atmosphere is the main pathway and will always exist. Therefore, the ERA deals primarily with the sources and receptors. The ERA is provided in Appendix A and is summarised below.

2.1.5 A Nature and Heritage Screening Request was submitted to Natural Resources Wales as part of the variation application to add the extruder plant and to relocate the wheel wash and vehicle washout facilities. The assessment identified a number of national and European designated sites within the statutory defined distances. This is shown in Appendix B.

2.2 Sources

2.2.1 The potential sources of risks have been considered for each risk type, as provided in Appendix A and summarised below:-

Odour



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- Odorous materials.

Noise and vibration

- Increased throughput of activities.

Fugitive emissions

- Particulate matter i.e. dust;
- Scavenging birds, pests and vermin;
- Mud; and
- Litter.

Accidents

- Fire;
- Leaks and spillages;
- Flooding; and
- Unauthorised access.

2.3 Pathways

2.3.1 The pathways have been identified for each risk type as shown in Table 1:-

Table 1: Potential Pathways

Risk Type	Pathway
Odour	Atmosphere
Noise	Atmosphere
Fugitive emissions	Atmosphere
	Tracked by Vehicles
Accidents	Atmosphere
	Surface water run-off
	Infiltration
	Percolation

2.4 Receptors

2.4.1 Receptors within statutory distance of the proposed application boundary have been identified and are shown on Drawing No CCF/A103882/REC/01. The protected habitats are also shown in

Appendix B. The main pathway for the identified sources will be the atmosphere and as such, atmospheric conditions can affect dispersion rates and hence potential risk. As a result, the location of each receptor in relation to the site may influence the potential impact of the risk, as summarised in Table 2.

Table 2: Location of Potential Receptors in relation to the Installation

Receptor	Direction from Operational Area	Minimum Distance from the Permit Application Boundary (approx. m)
Designated ecological habitats e.g. Ramsar, SAC, SPA, SSSI, LNR		
Chwarel Singret SSSI (Wales)	E	1500
Llay Bog SSSI (Wales)	S	1260
Other designations e.g. National Park, World Heritage Sites, Local Wildlife Site (LWS)		
-	-	-
Other Habitats		
Bryn y Gaer Broadleaved woodland	N	1690
Broadleaved woodland by Brier Lodge (SINC)	W	1880
Broadleaved woodland by Trewern close	S	1200
Broadleaved woodland by Rackery wood	NE	1480
Broadleaved woodland by Barton Tower	NE	1260
Nant-y-gaer Broadleaved woodland	S	420
Butt's Hill Broadleaved Woodland	S	1360
Broadleaved woodland along River Alun	W	1680
Worms wood Broadleaved woodland	S	1640
SINC by Park Road	SW	1550
Woodland Broadleaved by the Homestead (SINC)	E	1570
Domestic Dwellings		
Llay and Singret villages	SE	290
Schools, Shops, Commercial and Industrial		
Saint Francis of Assisi Catholic church	SE	300
The Church of Saint Marton of Tours	S	725
The Co-operative	S	750
The Crown restaurant	SE	300
Llay miners pub	S	440
Park Community Primary School	S	610
Nursing home	SE	990
Alyn Family doctors	S	490
Llay library	S	700
Carlton garden centre	S	165
Jaydee aquatics	S	290
Historic buildings / Listed buildings / Archaeological sites		N/A
Public Rights of Way		
Footpath LLA6	SE	290
Footpath LLA5	E	690
Footpath LLA4	NE	870
Footpath LLA17	NW	880



Footpath LLA19	N	880
Footpath LLA7	SE	615
Footpath LLA20	SE	640
Footpath LLA18	NW	950
Highways or Minor Roads		
Rackery lane	N	10
Miners road	SE	10
Sensitive land uses e.g. farmland, allotments, commercial fish farms, open space		
Farmland	NE	35
Open space	E	340
Open space	N	360
Surface Water e.g. rivers and streams		
River Alyn	S	1800
Open water by northern boundary of Best companies	N	270
Small Water Features		
Drain	W	475
Groundwater (sensitivity)		
According to the Environment Agency, the site lies within a Secondary A superficial deposit aquifer. The site does not lie within a groundwater source protection zone (GSPZ) or within a designated bedrock aquifer.		

2.5 Risk Assessment

2.5.1 The ERA (Appendix A) looks at each specific hazard identified and assesses the likelihood of those hazards impacting on the receptors. This is achieved by fulfilling the following objectives:-

- Identify the location and nature of each hazard;
- Identify the specific receptors potentially at risk and assess the sensitivity of each receptor;
- Provide a qualitative assessment of the risk posed to each sensitive receptor;
- Identify management and monitoring techniques; and
- Provide recommendations for more detailed assessments where necessary.

2.6 Summary of ERA

2.6.1 The Environmental Risk Assessment (Appendix A) indicates that the proposed development will have no significant impacts in terms of odour, noise and fugitive emissions, and the likelihood of accidents is minimal.



Drawings

CCF/A103882/REC/01 – Receptor Plan

CCF/A103882/LAY/01 – Site layout and Installation Boundary



Appendices



Appendix A – Environmental Risk Assessment



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Table A1: 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? If it occurs – 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.
Operation the of Extruder Plant.	Site Workers. Occupiers of domestic dwellings listed in Table 2. Workers at nearby industrial premises.	Atmosphere	<p>Activities will be contained within a building with fast acting roller shutter doors to limit the escape of odorous emissions.</p> <p>The extruder plant and associated kit will be operated within the current site building which is fitted with cyclone filters and the extruder plant itself is a separate enclosed plant which will sit within the building.</p> <p>The new extruder plant will operate at a maximum temperature of 120°C and will process Rapeseed and Beans and as such is not expected to produce any odours that could impact beyond the boundary.</p> <p>Any non-conformances or odour issues will be reported to the Site Manager and the site may update the odour management techniques if required.</p>	Very unlikely.	Nuisance to members of the public and local residents.	Not significant.



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Relocation of the Wheel Washing and Vehicle Cleaning Facility.	Site Workers. Occupiers of domestic dwellings listed in Table 2. Workers at nearby industrial premises.	Atmosphere	<p>The vehicle washing facility is to be moved to the new area of land as shown on Drawing No CCF/A103882/LAY/01.</p> <p>The vehicle wash will be utilised only during normal business hours.</p> <p>The wheel and vehicle wash is an existing activity and the operator does not wish to change the current washing techniques with regards to the current agreed detergents etc. The washing activity will occur within a three sided bay which will act to suppress any odours and sprays and it is not expected that the number of vehicles that are processed through the washing facility will increase as a result of this application.</p> <p>The site will constantly monitor for odour at the site boundary and if odour is identified, will investigate various management techniques including but not limited to:-</p> <ul style="list-style-type: none">• Masking agents; and• Revision of washing detergents. <p>Any non-conformances or odour issues will be reported to the Site Manager.</p>	Very unlikely	Nuisance to members of the public and local residents.	Not significant.
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Table A2: 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? If it occurs – 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.
Operation of the extruder plant and addition of three new silos.	Occupiers of domestic dwellings listed in Table 2. Workers at nearby industrial premises.	Atmosphere.	<p>The operation of the Extruder Plant will not increase noise levels at the site as activities will be undertaken within a building which will attenuate noise from the activities.</p> <p>The building is fitted with fast action roller doors and all doors will be kept closed while operations are being undertaken.</p> <p>Loading and unloading of vehicles will be undertaken within the sites building and deliveries will be undertaken within the hours stipulated on the planning permission.</p> <p>All mobile plant on site will utilise quiet noise reversing alarms.</p> <p>The silos are to be situated as shown on Drawing No CCF/A103882/LAY/01 which are away from sensitive receptors, the loading and unloading of silos is not expected to increase noise levels above what is already on site.</p> <p>Trees are situated between the site and the nearest residential properties. The only activities undertaken outside will be those associated with the running of the plant, i.e. placement of empty containers and wastes</p>	Intermittent during operating hours.	Intermittent noise and vibration disturbance.	Not significant if managed correctly.



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			<p>which are waiting removal from site.</p> <p>The Site Manager will be responsible for ensuring the above measures are implemented.</p>			
Increased vehicle movement on site.	<p>Occupiers of domestic dwellings listed in Table 2.</p> <p>Workers at nearby industrial premises.</p>	Atmosphere.	<p>The number of deliveries is not expected to increase as a result of this application. All deliveries will take place within the operating hours stipulated within the planning permission, truck movements are not expected to increase the risk to habitats and residents as a result increased noise.</p> <p>All trucks will be required to turn engines off when not in use and the site will ensure that they schedule deliveries in such a way as to avoid a build-up of vehicles waiting to get onto the site or waiting to get off the site.</p> <p>The site has set speed limits on site which are designed to keep vehicle noise to a minimum, these speed limits will be strictly adhered to.</p>	Intermittent during operating hours.	Intermittent noise and vibration disturbance.	Not significant if managed correctly.
Use of Wheel and Vehicle Wash.	<p>Occupiers of domestic dwellings listed in Table 2.</p> <p>Workers at nearby industrial premises.</p>	Atmosphere.	<p>The operator is not making any changes with regards to the operation of the wheel wash with the exception of its location.</p> <p>Washing activities will be undertaken within a specially designed bay as set out in the operating techniques document (Appendix C of the EPVA). The bay will be fitted with walls which will act to muffle the noise of the washing activities, providing attenuation.</p> <p>Vehicles are only to be washed within normal business hours to minimise disturbance to local receptors.</p>	Intermittent during operating hours.	Intermittent noise and vibration disturbance.	Not significant if managed correctly.



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Table A3: 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? If it occurs – 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 the operation the of the Extruder Plant.	<p>Site Workers.</p> <p>Occupiers of Domestic dwellings listed in Table 2.</p> <p>Surrounding farmland and woodland.</p>	Atmosphere.	<p>It is not considered that activities would generate dust given that activities will be undertaken within an enclosed building which is fitted with fast acting roller doors. The doors to the building will be kept closed at all times, with the exception of normal site activities (i.e. goods deliveries and product pickups).</p> <p>The current building is to be extended to make room for the extractor plant however the current emissions points will remain as shown on Drawing No CCF/A103882/LAY/01. These emission points are fitted with cyclones as per the requirements of the permit to remove particulates prior to discharging to atmosphere.</p> <p>Deliveries of raw material will be undertaken within the area stipulated on Drawing No CCF/A103882/LAY/01. All silos are fitted with high-level emergency alarms to ensure that the silo is not over filled. Material will be pumped into the silos through air tight fittings and at no</p>	<p>Dust could potentially reach the nearby dwellings when a strong wind blows in their direction.</p> <p>Management actions should prevent this happening.</p>	<p>Smothering.</p> <p>Nutrient enrichment.</p> <p>Nuisance – dust on cars, clothing, vegetation, etc.</p>	Not significant.



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			<p>time will the silos be open to the atmosphere while filling is taking place.</p> <p>Silos will be manned at all times when material is being either added or removed and site workers will remain vigilant to ensure that loading and unloading silos does not result in any fugitive emissions to the environment.</p> <p>The operator will ensure that good housekeeping is undertaken at all times both within the building and with regards to external areas. The operator will ensure that the site surfaces are kept clear, a road sweeper or water bowser may be used if necessary.</p> <p>All vehicles must comply the sites speed restrictions. Vehicle speeds will be limited to prevent re-suspension and entrainment of any particulates.</p> <p>The Site Manager will be responsible for ensuring the site does not generate fugitive emissions and that any fugitive emissions are identified and remedied as soon as is practicable.</p>			
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Dust generated by the washing out of vehicles and operation of wheel wash.	<p>Site Workers</p> <p>Occupiers of Domestic dwellings listed in Table 2.</p> <p>Surrounding farmland and woodland.</p>	Atmosphere.	<p>The vehicle and wheel washing activities are not expected to generate dust as any particulates will be damped down by the washing activity.</p> <p>If the wheel and vehicle washing activities lead to the potential for fugitive emissions the site may review fugitive emissions management which will include but not be limited to:-</p> <ul style="list-style-type: none"> • Use of a road sweeper; • Revision of site layout; and • Revision of site practices. <p>The Site Manager will be responsible for ensuring the wheel and vehicle washout area do not lead to the generation of dust.</p>	<p>Dust could potentially reach the nearby dwellings when a strong wind blows in their direction.</p> <p>Management actions should prevent this happening.</p>	<p>Smothering.</p> <p>Nutrient enrichment.</p> <p>Nuisance – dust on cars, clothing, vegetation, etc.</p>	Not significant.
To Water						
Contaminated rainwater.	<p>Groundwater & Surface water</p> <p>Occupiers of domestic dwellings listed in Table 2.</p> <p>Protected Habitats.</p>	<p>Direct surface water run-off from site.</p> <p>Infiltration.</p> <p>Percolation.</p>	<p>The introduction of the extruder plant and relocation of the wheel wash is not expected to result in contaminated runoff from the site which could impact on ground or surface water.</p> <p>The extruder plant will be located within a fully enclosed building which has an impermeable surface and sealed drainage.</p> <p>The site has separate drainage for those areas which will collect clean surface water. Clean surface water is discharged as per table 2.2.4 of the current permit.</p> <p>The handling of raw and finished products etc. takes place either within</p>	Very unlikely.	Contamination of surface water bodies.	Not significant



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			<p>the building, or within the area outlined on Drawing No CCF/A103882/LAY/01. All silos are located within concreted bunded areas which will act to contain either 110% of the largest silo, or if silos are grouped together, 25% of the total volume.</p> <p>The entire site is concreted with sealed drainage which will prevent the unauthorised discharge of water from the site. Additionally, the wheel and vehicle washing facility will be concreted with sealed drainage and kerbing. The wash water generated by this activity will discharge to sewer in accordance with the sites current trade effluent discharge consent and in accordance with table 2.2.7 of the current permit.</p> <p>The Site Manager will undertake regular inspections of surface water runoff at the site. All site operatives will be vigilant and report any problems to the Site Manager.</p>			
Pests/Scavenging birds						



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Birds and Pests	Site workers. Occupiers of domestic dwellings listed in Table 2.	Air. Ground.	<p>The operator produces ingredients for poultry feeds. All raw and finished product is contained within air tight silos which are not open to the atmosphere and all cooking activities will take place within a building.</p> <p>Any spills of raw ingredients will be cleaned up immediately to avoid attracting pests.</p> <p>The Site Manager undertakes regular inspections of the site, specifically checking for evidence of pests and scavenging birds and may employ the services of an exterminator as necessary.</p>	Unlikely.	Nuisance to local residents.	Not significant
Mud						
Mud from vehicle movements.	A617.	Tracked on vehicle wheels.	<p>The site operates a wheel and vehicle wash facility and all trucks which carry raw or processed materials are required to be washed out prior to leaving the site.</p> <p>If it becomes apparent that trucks are tracking mud onto local roads and highways, the operator may employ a road sweeper.</p>	Unlikely due to measures in place.	Local nuisance. Mud on roads is unsightly and can increase the likelihood of road traffic accidents.	Not significant.
Litter						
Windblown litter	Receptors identified in Table 2. Protected Habitats.	Air	<p>There will be a dedicated storage area on site for plastic, cardboard and other materials, which will be bulked and secured on hardstanding.</p> <p>A vigilant watch for litter will be undertaken by site operatives. In the unlikely event that litter is generated by the activity, the Site Manager will</p>	Unlikely due to measures in place.	Local nuisance	Not significant due to nature of waste received and management techniques employed.



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			implement a litter collection as necessary.			
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Table A4: Accident and Incident 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? If it occurs – 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.
Fire or failure to contain firewater.	Groundwater & Surface Water. Atmosphere. Occupiers of domestic dwellings listed in Table 2. Protected Habitats.	Infiltration. Contamination of surface water.	Procedures are in place to minimise the likelihood of fire occurring and to ensure that any fires that do occur are controlled effectively and safely. The site has a dedicated storage facility for all chemicals that are utilised in the process. The chemical store is fully enclosed and situated within its own bunded drainage system. All chemicals stored on site are stored in accordance with industry guidelines for storage heights and separation distances. The site benefits from impermeable surfacing and sealed drainage. As such firefighting water will be contained within the site and pumped out rather than being discharged to waterways or groundwater. Consideration will also be given to tertiary firewater containment. The site operates a no smoking policy. The site will ensure that routine maintenance of equipment is undertaken in accordance with the manufacturers	Unlikely.	Contamination of local groundwater and/or surface water.	Not significant as long as management procedures adhered to.



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			<p>guide and any hot works required will be undertaken well away from any areas which house potentially flammable materials. All staff undergo fire training and regular emergency drills are undertaken.</p> <p>The site manager is responsible for actions in the event of a fire.</p>			
Leaks and spillages of fuels/oils and or chemicals.	Groundwater & Surface Water Protected Habitats.	Surface run-off. Infiltration. Percolation.	<p>All processing activities will be undertaken within a building that benefits from an impermeable surface with sealed drainage.</p> <p>The sewer connection is fitted with a shutoff valve which can be utilised in the event of a spill that could enter the sewer system as is the discharge point to the Singret Brook. The drainage arrangements at the site are clearly marked with regards to the surface water and process drains.</p> <p>All flammable and explosive chemicals will be stored in appropriately secured chemical stores and is fitted with an internal drainage system to prevent leaks and spills to ground or surface water.</p> <p>The refuelling of plant and vehicles will be carried out on an impermeable surface within an area of sealed drainage. Any spillages of fuel or oil will be contained within the sites sealed drainage system and removed as soon as is practicable.</p> <p>All plant and machinery will be maintained and inspected regularly.</p>	Unlikely.	Contamination of local groundwater and/or surface water.	Not significant.



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			<p>All staff will be provided with appropriate spill training. Spill kits will be available on site at all times. The kits will include absorbent materials which can be used to clear up small to medium spillages. These materials will be transferred off-site to a suitably authorised facility for disposal. Any large spills will be contained using booms contained within the spill kits; if this is not possible then the spill will be contained within the sealed drainage system. Any contaminated water would then be pumped out and discharged to a suitable licenced facility.</p> <p>The cause of any leaks and spillages that do occur will be investigated and site procedures will be reviewed regularly to determine if the procedures and infrastructure onsite continue to be appropriate.</p> <p>The site manager will be responsible for ensuring any remedial works required will be implemented following a leak or spillage.</p>			
Leaks and spillages from the wheel and vehicle washing facility.	Groundwater & Surface Water Protected Habitats.	Surface run-off. Infiltration. Percolation.	<p>The wheel and vehicle wash will benefit from an impermeable surface with sealed drainage.</p> <p>The discharge point to sewer will be equipped with a shutoff valve which can be activated in the event of a spill or leak from any vehicles while washing is being undertaken to prevent the release of unauthorised contaminants to the sewer system.</p>			



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			<p>The wheel and vehicle wash infrastructure will be subject to routine checks to ensure that it remains fit for purpose and any cracked concrete will be repaired when and as necessary.</p> <p>The cause of any leaks and spillages will be investigated and site procedures will be reviewed regularly to determine if the procedures and infrastructure onsite continue to be appropriate.</p> <p>The site manager will be responsible for ensuring any remedial works required will be implemented following a leak or spillage.</p>			
Flooding.	<p>Groundwater.</p> <p>Surface water bodies identified in Table 2.</p> <p>Agricultural land.</p> <p>Habitats.</p>	<p>Infiltration.</p> <p>Percolation.</p>	<p>Routine maintenance will be undertaken of drainage systems to prevent flooding.</p> <p>The additional area of land to be included within the permit boundary will be specifically engineered with regard to managing surface water.</p> <p>All process activities will take place within the building</p> <p>The proposed activities will not increase the risk of flooding.</p>	Unlikely.	<p>Contamination of local groundwater and/or surface water.</p> <p>Contamination of local agricultural land.</p>	Not significant as appropriate long standing management techniques are in place in the area.
Vandalism.	<p>Site infrastructure.</p> <p>Site workers.</p>	Unauthorised entry to the site.	<p>The site is within an industrial estate and is not considered one that would be regularly visited by members of the public.</p> <p>The site entrance is locked at all times outside of normal business hours and is fully fenced. During working hours the</p>			



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			<p>site will be manned. All visitors during business hours must sign into the visitors book upon arrival and any unauthorised persons onsite will be reported to the site manager immediately.</p> <p>The site also has the following additional security measures in place:-</p> <ul style="list-style-type: none">• CCTV at the site entrance;• Manually controlled gate; and• Security lighting			
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Appendix B – Nature and Heritage Conservation Screening Report