



**APPLICATION FOR AN ENVIRONMENTAL PERMIT  
UNDER THE ENVIRONMENTAL PERMITTING  
(ENGLAND AND WALES) REGULATIONS 2016  
(AS AMENDED)**

**ENVIRONMENTAL RISK ASSESSMENT**



**PLATTS AGRICULTURE LIMITED,  
MINERS PARK, LLAY INDUSTRIAL ESTATE,  
LLAY, WREXHAM**

**ECL Ref: PLAT.01.02/ERA  
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## ACRONYMS / TERMS USED IN THIS REPORT

AW	Ancient Woodland
CCTV	Closed Circuit Television
COFNOD	North Wales Environmental Information Service
DEFRA	Department for the Environment, Food and Rural Affairs
DMP	Dust Management Plan
EA	Environment Agency
ECL	Environmental Compliance Limited
EMS	Environmental Management System
EP	Environmental Permit
ERA	Environmental Risk Assessment
EWC	European Waste Catalogue
FPP	Fire Prevention Plan
FRS	Fire Rescue Service
Ha	Hectares
HGVs	Heavy Goods Vehicles
LEV	Local Exhaust Ventilation
LNR	Local Nature Reserve
LWS	Local Wildlife Site
MAGIC	Multi-Agency Geographical Information for the Countryside
NIA	Noise Impact Assessment
NGR	National Grid Reference
NMP	Noise Management Plan
NNR	National Nature Reserve
NRW	Natural Resources Wales
NVZ	Nitrate Vulnerable Zone
OS	Ordnance Survey
Platts	Platts Agriculture Limited
PPMR	Planned Preventative Maintenance Routine
Ramsar	The Ramsar Convention on Wetlands of International Importance
SAC	Special Areas of Conservation
SPA	Special Protection Areas
SSSI	Sites of Special Scientific Interest
The Facility	Platts Agriculture Waste Wood Processing Facility

## 1. INTRODUCTION

### 1.1. Overview

- 1.1.1. Environmental Compliance Limited (“ECL”) has been commissioned by Platts Agriculture Limited (“Platts”) to prepare an Environmental Risk Assessment (“ERA”) to form part of the bespoke Environmental Permit (“EP”) application for a proposed wood waste processing facility, hereafter referred to as “the Facility” located in Llay Industrial Estate, Llay, Wrexham.
- 1.1.2. Platts is proposing to accept 60,000 tonnes per annum of non-hazardous waste wood at the Facility. Consequently, the following Specified Waste Operation is proposed:
- storage of non-hazardous waste wood with treatment limited to pulverising to produce wood dust for use as bedding material and also cubicle conditioner within the agricultural livestock sector.
- 1.1.3. Only clean, uncoated and untreated waste wood is to be used to produce animal bedding products.
- 1.1.4. Wood waste which has been previously coated will not be used to produce animal bedding. The clean untreated wood waste will not be mixed with this type of wood waste.
- 1.1.5. The wood waste which has been previously coated will be kept entirely separate from the clean, uncoated and untreated wood waste and will be pulverised to produce a cubicle conditioner. The cubicle conditioner is applied in limited quantities (1 large cup) on the mat or mattress to control moisture and keep cattle clean and hygienic.
- 1.1.6. An ERA has been undertaken in accordance with Natural Resources Wales (“NRW”) *‘How to Comply with Your Environmental Permit’* (Version 8, October 2014) and the relevant requirements of the current version of the Environment Agency (“EA”) online guidance<sup>1</sup>, in order to:
- identify potential risks that site operations may present to the environment;
  - screen out any insignificant risks;
  - assess potentially significant risks in detail; and
  - decide on the appropriate control measures.
- 1.1.7. Accordingly, the assessment has addressed the potential risks relating to the operation of the proposed Facility, namely:
- amenity risks (e.g., fugitive emissions to air, fugitive emissions to water, noise, pests, odour etc.); and
  - accidents (e.g., fire, loss of containment etc.).

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<sup>1</sup> EA online guidance – *‘Risk assessments for your environmental permit’*. Available at <https://www.gov.uk/guidance/risk-assessments-for-your-environmental-permit>, accessed April 2021.

## 2. IDENTIFICATION OF RECEPTORS

### 2.1. Site Settings

- 2.1.1. The Facility will be located on Miners Park, Llay Industrial Estate, Llay, Wrexham, LL12 0PJ. The Facility is centred on the Ordnance Survey ("OS") National Grid Reference ("NGR") 332077 356370 and will occupy an area of approximately 1.56 Hectares ("Ha").
- 2.1.2. The Site Location Plan (Drawing Reference PLAT.01.02-01) details the proposed EP boundary (outlined in green) and is provided in Section 3 of this application submission.
- 2.1.3. Figure 1 provides the indicative location of the Facility (red outline) within the context of the surrounding environment.

**Figure 1: Indicative Site Location**



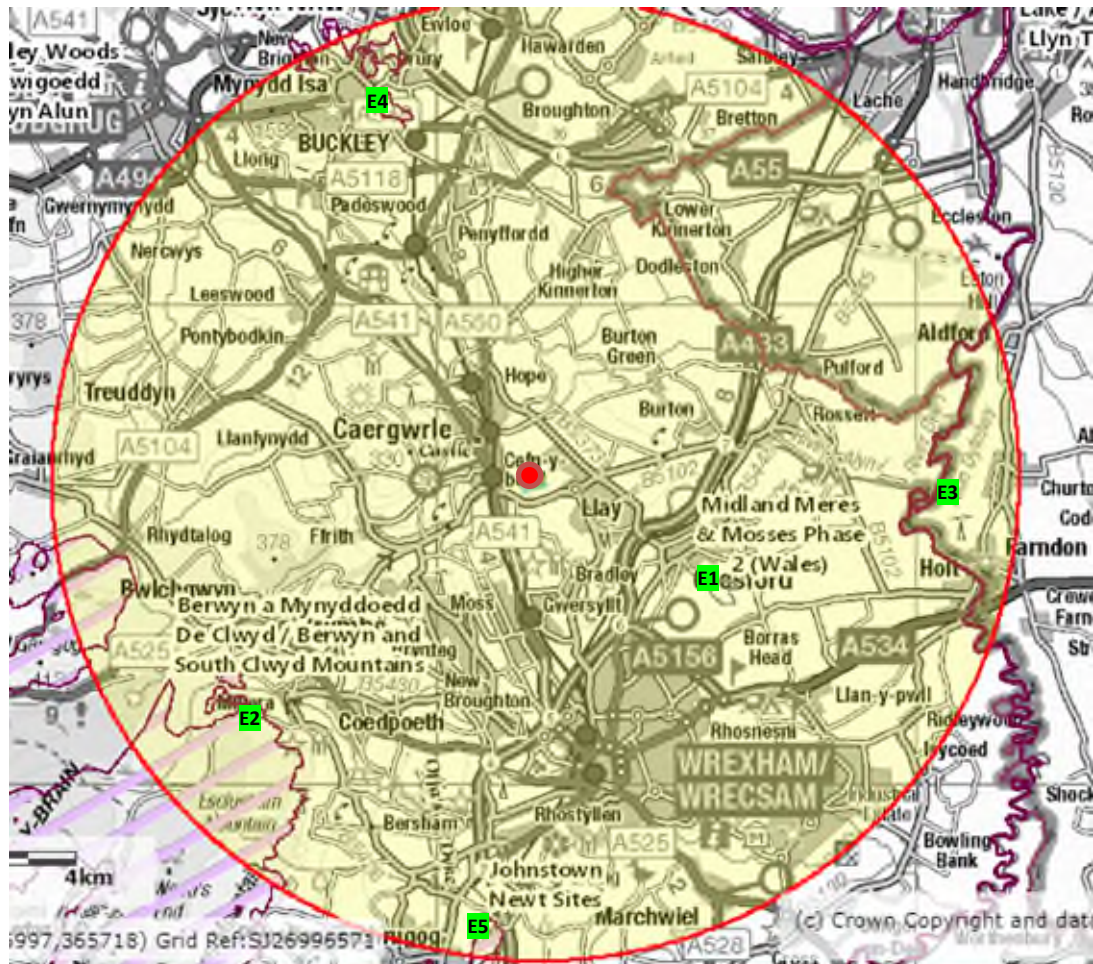
- 2.1.4. The Facility is located within Llay Industrial Estate which contains numerous industrial and commercial units surrounded predominantly by agricultural land. The former sand and gravel quarry is located approximately 0.13km south of the proposed EP boundary.
- 2.1.1. Llay village is located approximately 0.84m south east of the EP boundary at its nearest point. Residential land use is also located approximately 0.36km north, 0.39km south east and 0.55km south west of the EP boundary.
- 2.1.2. The sensitive receptors within 1km of the EP boundary are illustrated on the Sensitive Receptor Plan (Drawing Reference PLAT.01.02-03) which is contained in Section 3 of this application submission.



## 2.2. Potentially Sensitive Ecological Receptors

- 2.2.1. A review of the area using the Multi-Agency Geographic Information for the Countryside<sup>2</sup> ("MAGIC") online tool identified that the Facility is located within 10km of one Ramsar Convention on Wetlands of International Importance ("Ramsar") Site and five Special Areas of Conservation ("SAC"). There are no Special Protection Areas ("SPA") within 10km of the Facility EP boundary. The indicative locations of the identified ecological receptors are shown in Figure 2.

**Figure 2: Ramsar and SACs identified within 10km of the Facility Boundary**



**Note to Figure 2:**  
 Purple line - SAC  
 Green line – Ramsar  
 Red infilled circle – The Facility

<sup>2</sup> Department for Environment, Food and Rural Affairs ("DEFRA") MAGIC Online Mapping Tool, available at: <https://magic.defra.gov.uk/magicmap.aspx>, accessed April 2021

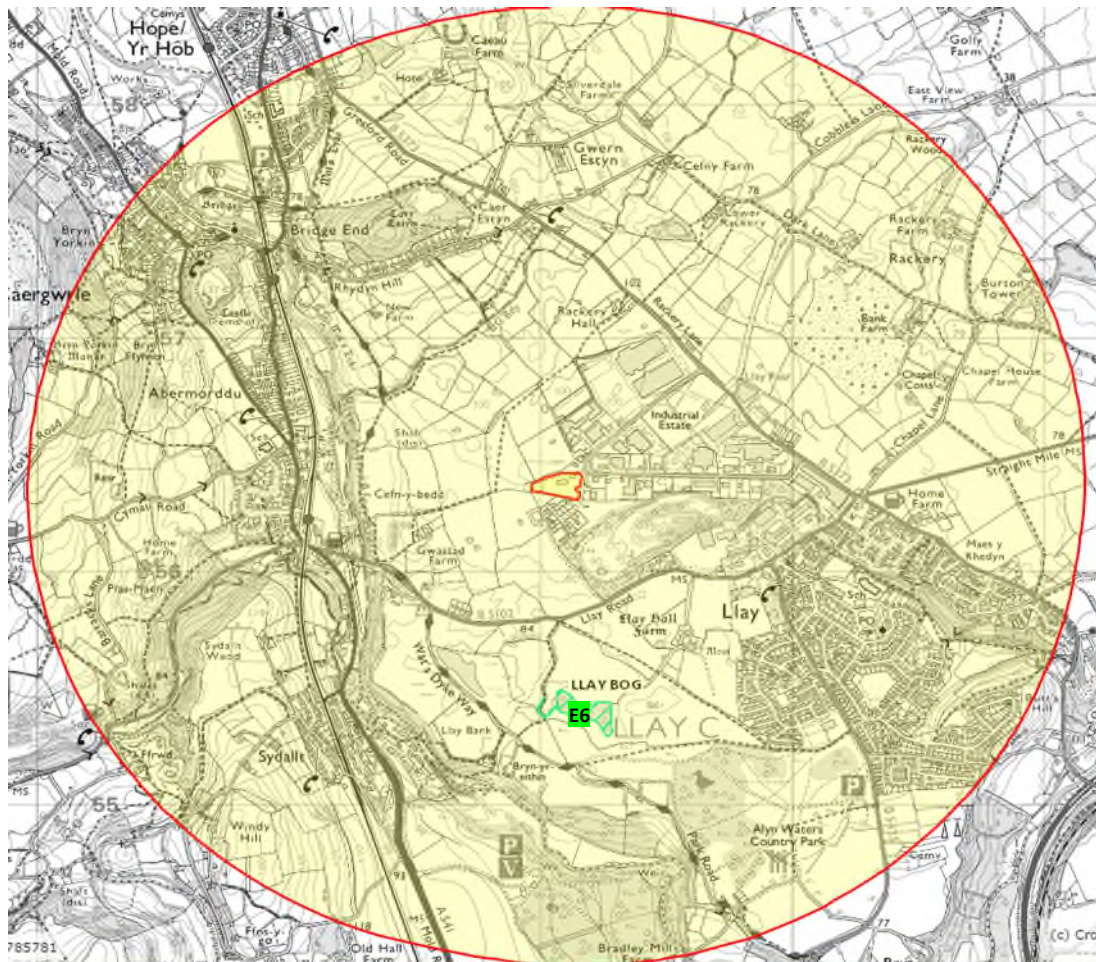
2.2.2. The NGR of the identified ecological receptors are listed in Table 1, together with their distance and direction from the Facility boundary.

**Table 1: Ramsar and SACs within 10km of the Facility Boundary**

Ref	Description	Designation	Centre Point		Nearest Point	
			Easting	Northing	Distance from EP Boundary (km)	Direction
E1	Midland Meres and Mosses Phase 2 (Wales)	Ramsar	335915	354107	4.11	SE
E2	Berwyn and South Clwyd Mountains	SAC	325660	350120	7.27	SW
E3	River Dee and Bala Lake	SAC	340439	356164	7.57	E
E4	Deeside and Buckley Newt Sites	SAC	329050	364070	7.78	NE
E5	Johnstown Newt Site	SAC	331045	346776	9.10	S

2.2.3. The Facility is also located within 2km of one Site of Special Scientific Interest ("SSSI") shown as turquoise hatching in Figure 3.

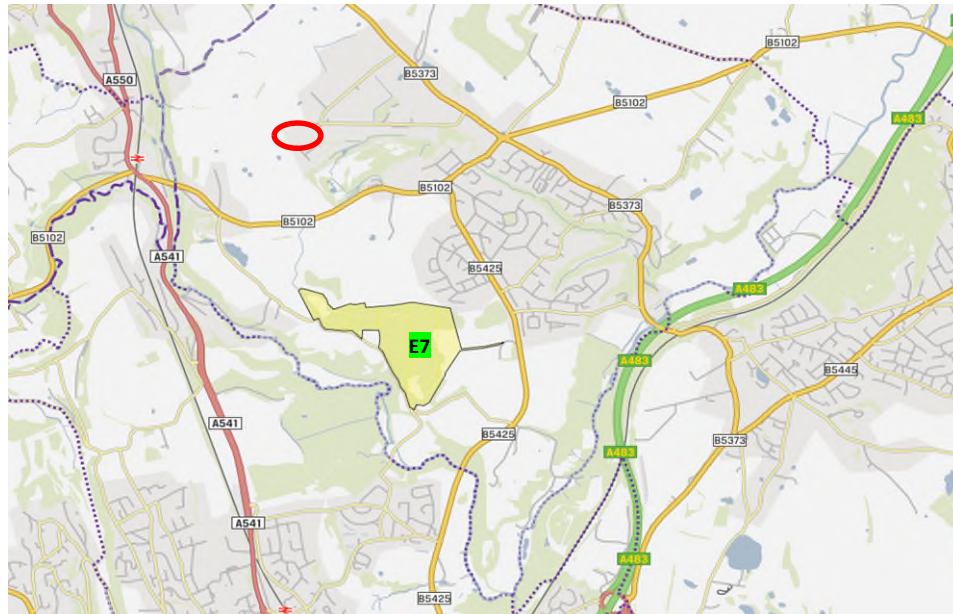
**Figure 3: SSSIs identified within 2km of the Facility Boundary**





- 2.2.4. According to the Lle Geo-Portal for Wales<sup>3</sup>, there are no National Nature Reserves (“NNRs”) within 2km of the Facility boundary. Alyn Waters Country Park is designated as a Local Nature Reserve (“LNR”) and Local Wildlife Site (“LWS”) and is located within 2km of the Facility boundary as shown in Figure 4.

**Figure 4: LNR identified within 2km of the Facility Boundary**

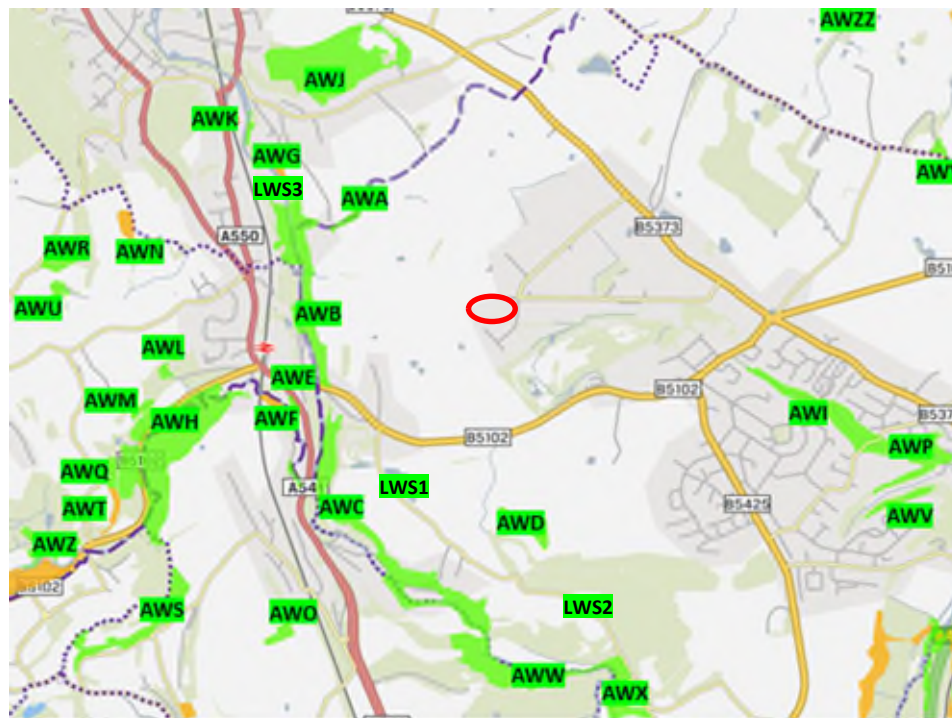


- 2.2.5. A number of ancient woodland (“AW”) sites have been identified within 2km of the Facility boundary. Several LWS were also identified within 1km of the Facility boundary, these are shown in Figure 5.

<sup>3</sup> Lle Geo-Portal for Wales Mapping Tool, available at: <https://lle.gov.wales/catalogue?t=1&lang=en>, accessed April 2021.



**Figure 5: Ancient Woodland and Local Wildlife Sites Identified**



Note to Figure 5: Green shading – Ancient Semi Natural Woodland. Orange shading – Restored Ancient Woodland

2.2.6. The NGR of the identified AW within 2km of the Facility, and LWS within 1km of the Facility are listed in Table 2, together with their distance and direction from the Facility boundary.

**Table 2: Ecological Receptors within 2km of the Facility Boundary**

Ref	Description	Designation	Centre Point		Nearest Point	Direction
			Easting	Northing	Distance from EP Boundary (km)	
AWA	Ancient Semi Natural Woodland	AW	331476	356814	0.64	NW
AWB	Ancient Semi Natural Woodland	AW	331249	356358	0.67	W
AWC	Ancient Semi Natural Woodland	AW	331646	355183	0.71	SW
LWS1	Blast Road Pond	LWS	331675	355644	0.83	SW
E6 & AWD	Llay Bog Ancient Semi Natural Woodland	SSSI & AW	332181	355406	0.83	S
AWE	Ancient Semi Natural Woodland	AW	331194	355946	0.84	SW
AWF	Restored Ancient Woodland	AW	331196	355950	0.90	SW
E7 & LWS2	Alyn Waters Country Park	LNR & LWS	332632	355044	approx. 1	S

**Table 2: Ecological Receptors within 2km of the Facility Boundary (Cont.)**

Ref	Description	Designation	Centre Point		Nearest Point	Direction
			Easting	Northing	Distance from EP Boundary (km)	
LWS3	Rhydyn Hall Grassland	LWS	331170	356852	0.91	
AWG	Restored Ancient Woodland	AW	331153	357007	0.98	NW
AWH	Ancient Semi Natural Woodland	AW	330655	355791	1.01	W
AWI	Ancient Semi Natural Woodland	AW	333513	355906	1.02	E
AWJ	Ancient Semi Natural Woodland	AW	331388	357488	1.12	NW
AWK	Ancient Semi Natural Woodland	AW	331016	357194	1.22	NW
AWL	Ancient Semi Natural Woodland	AW	330640	356114	1.29	W
AWM	Ancient Semi Natural Woodland	AW	330565	355905	1.41	W
AWN	Restored Ancient Woodland	AW	330481	356784	1.49	W
AWO	Ancient Semi Natural Woodland	AW	331132	354932	1.59	S
AWP	Ancient Semi Natural Woodland	AW	333895	355711	1.60	E
AWQ	Ancient Semi Natural Woodland	AW	330406	355672	1.68	W
AWR	Ancient Semi Natural Woodland	AW	330190	356617	1.70	W
AWS	Ancient Semi Natural Woodland	AW	330554	354964	1.71	SW
AWT	Restored Ancient Woodland	AW	330422	355517	1.72	SW
AWV	Ancient Semi Natural Woodland	AW	333811	355501	1.74	SE
AWW	Ancient Semi Natural Woodland	AW	332387	354261	1.78	S
AWX	Ancient Semi Natural Woodland	AW	332906	354366	1.90	S
AWY	Ancient Semi Natural Woodland	AW	333998	357070	1.91	NE
AWZ	Ancient Semi Natural Woodland	AW	330121	355355	1.96	SW
AWZZ	Ancient Semi Natural Woodland	AW	333695	357827	1.97	NE

- 2.2.7. A Nitrate Vulnerable Zone (“NVZ”) is located 0.61km west of the proposed EP boundary.
- 2.2.8. Other potentially sensitive land uses within 1km of the Facility were also considered. A review of the area using the Lle Geo-Portal for Wales indicated that none of the following sensitive land uses are located within a 1km radius of the Facility:
- Areas of Outstanding Natural Beauty;
  - Source Protection Zones;
  - Scheduled Monuments; or
  - National Parks.
- 2.2.9. Adjacent to the proposed Facility boundary lies a Great Crested Newt habitat area developed by Platts as part of a planning application dating back to 2001. The habitat area comprises a designated 10m wide landscaped strip adjoining open countryside and is illustrated in the Sensitive Receptor Plan (Drawing Reference PLAT.01.02-03) contained within Section 3 of this application submission. As the designated habitat area falls outwith the proposed Environmental Permit boundary, no changes are proposed to be made to this area. The potential impact of the proposed activities on the local Great Crested Newt population is considered in this ERA.
- 2.2.10. In addition to the above identified ecological receptors, an ecological study has been carried out for the Facility by qualified Ecologists (Preliminary Desktop Ecological Appraisal) and is contained within Section 12 of this application submission. Using data provided by the North Wales Environmental Information Service (“COFNOD”), the ecological study identified Great Crested Newts, bats, and nesting birds as key nearby ecological receptors of local value. All other protected species/ecological receptors identified were considered to be of less than local value.
- 2.2.11. With regards to the likely impacts on identified key ecological receptors, as there will be no change to the infrastructure at the Facility and therefore no loss of existing habitat, no adverse impacts are anticipated on Great Crested Newts, bats, or nesting birds. Consequently, the ecological report did not identify any further recommendations for surveys or mitigation measures associated with the key ecological receptors identified.

## **2.3. Potentially Sensitive Human Receptors**

- 2.3.1. Twenty-six potentially sensitive human receptors have been identified within 1km of the Facility and are displayed in Figure 6 and outlined in Table 3.
- 2.3.2. The sensitive receptors within 1km of the Facility identified by land use, such as commercial, industrial, residential, and open green space/recreational areas are shown on the Sensitive Receptor Plan (Drawing Reference PLAT.01.02-03) contained in Section 3 of this application submission.

Figure 6: Human Receptors within 1km of the Facility



Table 3: Human Receptors within 1km of the Facility

Ref	Description	Centre Point		Nearest Point	
		Easting	Northing	Distance from Permit Boundary (km)	Direction
H1	Llay Industrial Estate - North	332313	356581	0	N
H2	Llay Industrial Estate - South	332103	356240	0	S
H3	Llay Industrial Estate - East	332491	356424	0	E
H4	Residential – Rackery Lane	332321	357145	0.36	N
H5	Residential – Llay Road	332486	356042	0.39	SE
H6	Llay Industrial Estate – South East	332908	356174	0.43	SE
H7	Commercial and Residential – Farm Off Llay Road	331527	356155	0.43	SW
H8	Residential – Llay Road	331680	355841	0.55	SW



**Table 3: Human Receptors within 1km of the Facility (Cont.)**

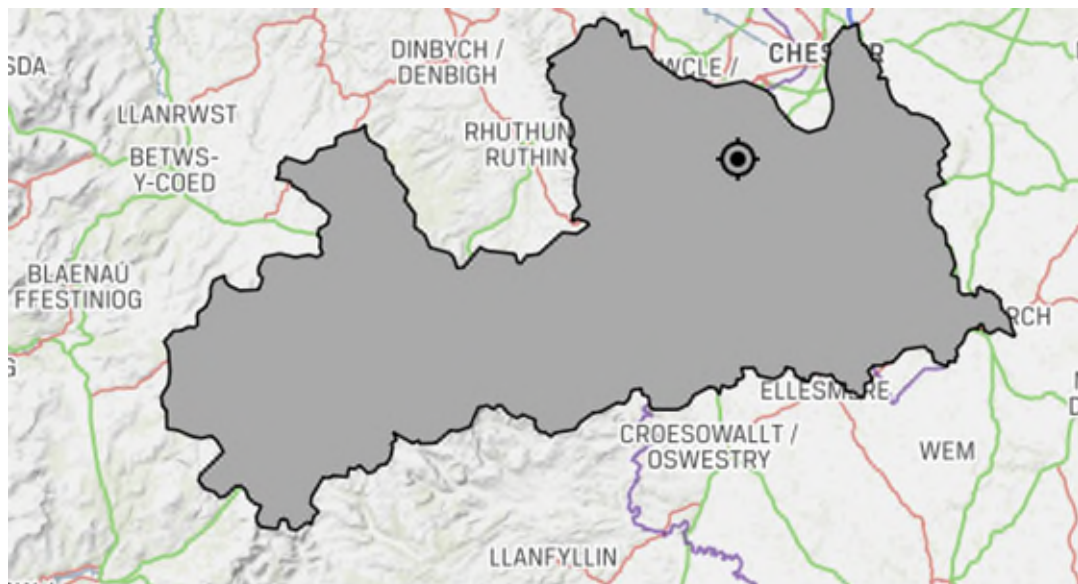
Ref	Description	Centre Point		Nearest Point	
		Easting	Northing	Distance from Permit Boundary (km)	Direction
H9	Residential – South of Rhyddyn Hill	331788	357157	0.64	N
H10	Gwastad Hall Nursing Home	331376	355935	0.69	NE
H6 11	Residential – South Off Llay Road (B5102)	332588	355711	0.70	SE
H12	Residential and Commercial – Off Llay Road (Caravan Storage)	331233	356202	0.71	W
H13	Residential – Rackery Lane	332982	356573	0.77	E
H14	Recreational – Llay Miners Welfare Institute (including sports facilities)	332899	355986	0.78	E
H15	Residential – Llay Road	331150	356124	0.79	SW
H16	Commercial – Public House	331159	356072	0.80	SW
H 17	Residential – Wrexham Road	331217	355995	0.82	SW
H18	Industrial – Poultry Feed Mill	332806	357159	0.83	NE
H19	Residential – First Avenue	332961	356068	0.84	E
H20	Residential – Llay New Road	332955	356015	0.84	E
H21	Residential – Wrexham Road (N)	331098	356180	0.84	SW
H22	Residential – Wrexham Road (S)	331228	355864	0.84	SW
H23	Residential – Acacia Court	332994	356088	0.86	E
H24	Commercial – New Farm Caravan Park	331373	357106	0.87	NW
H25	Residential – Manor Close	332811	355703	0.88	SE
H26	Cefn-y-bedd – Residential Housing A514 and A550	331053	356529	0.91	W

## 2.4. Surface Waters

- 2.4.1. There are a number of small ponds located in the surrounding area. However, the nearest major waterbody is the Alyn River located approximately 0.68km west of the proposed EP boundary.
- 2.4.2. The Facility is located within the River Dee Water Protection Zone<sup>4</sup> shown in Figure 7. The Facility has been issued consent by NRW to store and use controlled substances within the River Dee Water Protection Zone.

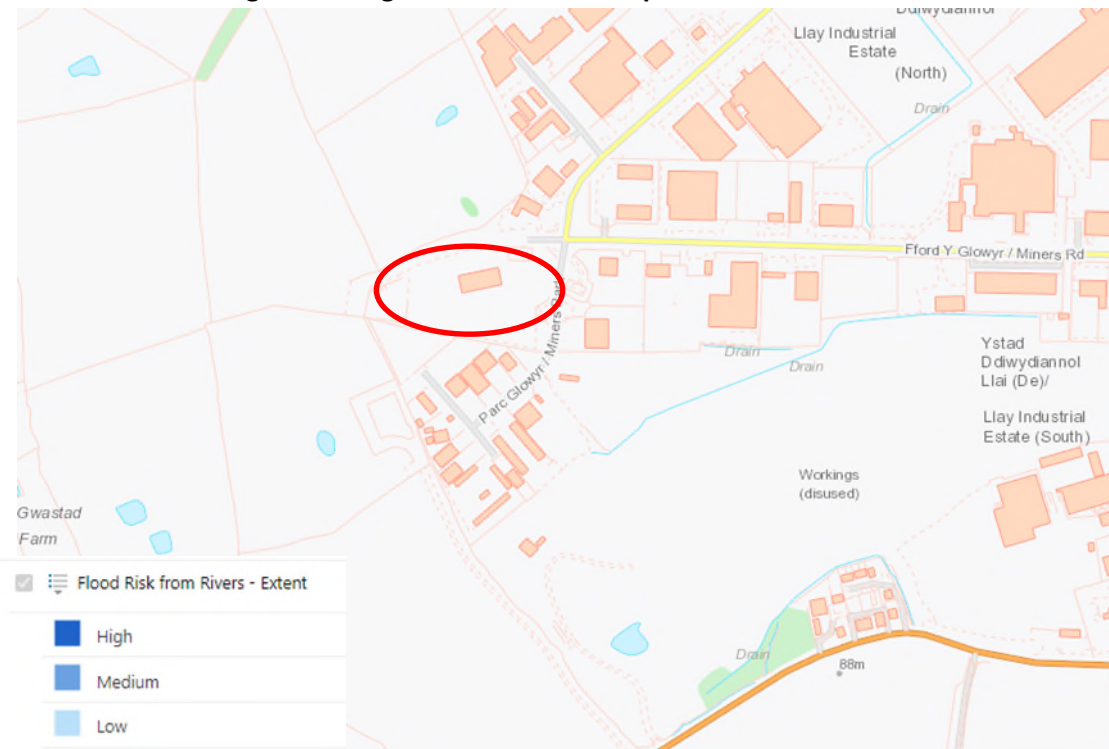
<sup>4</sup> Lle-Portal for Wales, Dee Water Protection Zone, available at: <http://lle.gov.wales/catalogue/item/DeeWaterProtectionZone/?lang=en>, accessed April 2021.

**Figure 7: Location of River Dee Water Protection Zone**



- 2.4.3. As shown on NRW's Long Term Flood Risk Map<sup>5</sup> provided in Figure 8, the Facility is not at risk of flooding from rivers and seas.

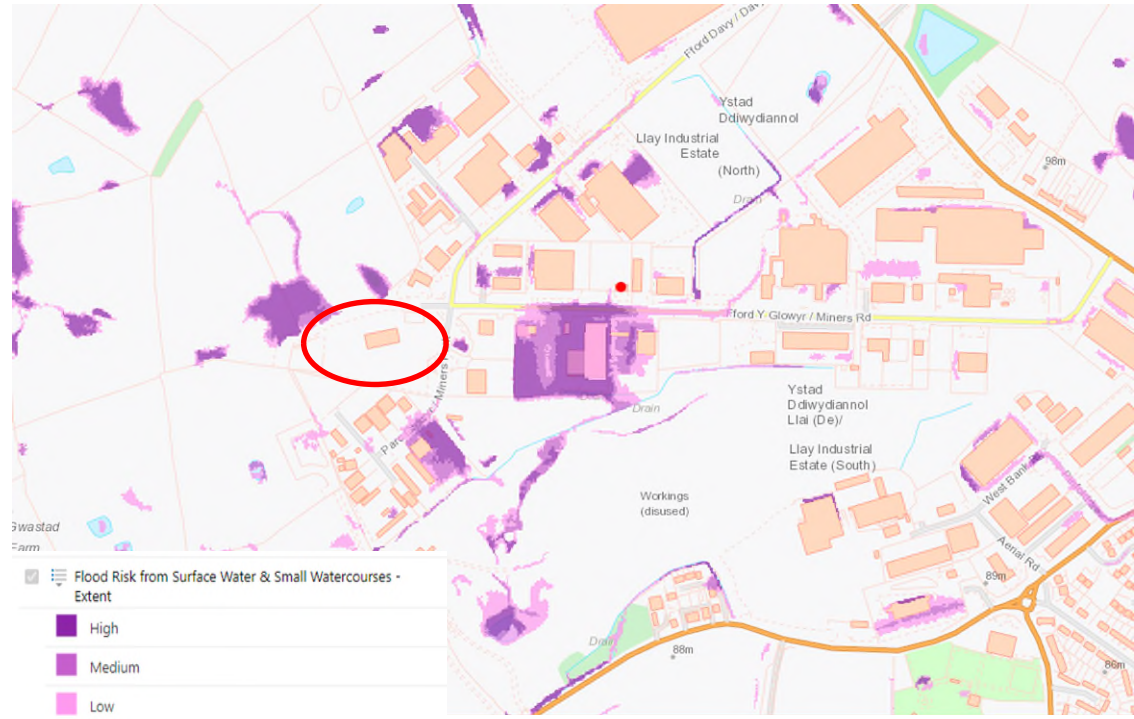
**Figure 8: Long Term Flood Risk Map – Rivers and Seas**



<sup>5</sup> Long Term Flood Risk Maps, available at: <https://naturalresources.wales/evidence-and-data/maps/long-term-flood-risk/?lang=en>, accessed January 2022.

- 2.4.4. Figure 9 shows that the Facility is located within an area categorised as possessing very low flood risk from surface water. All areas outside of the shading are deemed to be at very low risk which is defined by NRW as having less than 0.1% of flooding.

**Figure 9: Long Term Flood Risk Map – Surface Waters**



### **3. IDENTIFICATION OF THE RISKS**

#### **3.1. Amenity Risks**

3.1.1. Taking into account the nature of the activities that will be undertaken at the proposed Facility, the main amenity risks identified are as follows:

- fugitive emissions to air (dust);
- point source emissions to water (foul sewer);
- fugitive emissions to water;
- noise and vibration; and
- pests.

3.1.2. Note that as the proposed activities do not involve any point source emissions i.e. process contributions to air, land or water, no assessment has been undertaken. The environmental risks in relation to fugitive emissions to air and water have been assessed in Section 4 of this ERA.

#### **3.2. Accident Risks**

3.2.1. The main potential accident risks have been identified as:

- fire;
- explosion;
- loss of power/system failure;
- loss of containment of potentially polluting materials; and
- vandalism.



## **4. ASSESSMENT OF RISKS**

### **4.1. Methodology**

4.1.1. The risk assessments have been undertaken using the following approach for amenity and accident risks:

- identification of hazards associated with the risk that have the potential to cause harm;
- identification of potential receptors i.e. what is at risk (for the purposes of this assessment, typical potential receptors have been identified)?
- pathway i.e. how can the hazard get to the receptor?
- risk management measures employed to reduce the risk to an acceptable level;
- probability of exposure i.e. how likely is this contact?
- consequence i.e. what is the harm that can be caused?
- assessment of overall risk.

4.1.2. The assessments for the amenity and accident risks identified above are presented in Tables 4 and 5 respectively.

**Table 4: Amenity Risk Assessment**

Hazard	Receptors	Pathway	Risk Management	Probability of Exposure	Consequence	Overall Risk
<b>Emissions to Air</b>						
<i>Fugitive Emissions to Air (e.g. dust)</i>						
Releases of particulate matter (dusts)	Human population in surrounding area (see Section 2.3 of this ERA).	Release to Air – windblown dispersion in atmosphere.	<p>The Facility will be operated in accordance with the Dust Management Plan (“DMP”) (PLAT.01.02/DMP) which will form part of the Environmental Management System (“EMS”). The DMP is contained in Section 9 of this submission. A summary of the risk management measures is provided below.</p> <p>Wood waste materials will be delivered to the Facility within enclosed Platts’ trailers.</p> <p>The wood waste trailer will be unloaded into the external designated storage area with the material remaining within the enclosed trailer during storage prior to processing preventing any fugitive emissions to air during storage operations.</p> <p>Offloading of the trailers is undertaken internally within an enclosed building via a walk-in conveyor which feeds into the storage silo.</p> <p>An extensive abatement plant prevents any fugitive dust emissions from being released during the offloading and also the main pulverising process. Any wood dust captured by the local exhaust ventilation (“LEV”) system is fed back into the storage silo for processing.</p> <p>The finished product is weighed in a hopper and packaged in plastic wrap before being palletised in the external yard or occasionally stored within trailers. The plastic wrap minimises the likelihood of any fugitive emissions to air reaching sensitive receptors.</p>	Moderate  Risk management measures should prevent release from reaching the identified receptors	<p>Harm to human health – respiratory irritation and illness.</p> <p>Possible dust nuisance – dust on cars, clothing etc.</p>	Not significant if risk management measures are strictly adhered to

**Table 4: Amenity Risk Assessment (Cont.)**

Hazard	Receptors	Pathway	Risk Management	Probability of Exposure	Consequence	Overall Risk
<b>Emissions to Air (Cont.)</b>						
<i>Fugitive Emissions to Air (e.g., dust)</i>						
Releases of particulate matter (dusts)	Human population in surrounding area (see Section 2.3 of this ERA).	Release to Air – windblown dispersion in atmosphere.	<p>Daily visual inspection of fugitive emissions will be undertaken by the Shift Supervisor to identify and record any activities that are either resulting in dust emissions or have the potential to give rise to dust emissions which could escape the Facility's EP boundary. This includes inspecting the integrity of the plastic wrapping. If any damage is identified, the material will be sent for re-wrapping.</p> <p>The daily monitoring checks together with any actions taken will be recorded on the Daily Site Monitoring Form contained in the DMP and EMS.</p>	<p>Moderate</p> <p>Risk management measures should prevent release from reaching the identified receptors</p>	<p>Harm to human health – respiratory irritation and illness.</p> <p>Possible dust nuisance – dust on cars, clothing etc.</p>	Not significant if risk management measures are strictly adhered to
<b>Emissions to Water</b>						
<i>Emissions to Water – Surface Water</i>						
Fugitive emissions to surface water	Controlled waters	Via site drainage system	<p>There are no emissions to surface water. All site runoff including clean surface runoff (i.e. rainwater) will enter the foul drainage system before leaving the Facility (see below).</p> <p>The drainage arrangements are shown on the Drainage Arrangements Plan (PLAT.01.02-06) contained in Section 3 of this submission.</p>	Very Low	Contamination of controlled waters	Not significant if risk management measures are strictly adhered to
<i>Emissions to Water – Foul Sewer</i>						
Release of effluent derived from vehicle washing	Welsh Water Effluent Treatment Plant and subsequently, controlled waters	Via site drainage system	<p>Platts undertake weekly vehicle washing at the Facility.</p> <p>Set quantities of vehicle detergent are used and the EMS will include a procedure for the annual review of new developments in raw materials and for the implementation of any suitable ones with an improved environmental profile.</p>	Low	Contamination of controlled waters	Not significant if risk management measures are strictly adhered to

**Table 4: Amenity Risk Assessment (Cont.)**

Hazard	Receptors	Pathway	Risk Management	Probability of Exposure	Consequence	Overall Risk
<b>Emissions to Water</b>						
<i>Point Source Emissions to Water – Foul Sewer (Cont.)</i>						
Release of effluent derived from vehicle washing	Welsh Water Effluent Treatment Plant and subsequently, controlled waters	Via site drainage system	<p>The effluent derived from vehicle washing is discharged to sewer, designated as S1, via a silt/oil interceptor as shown on the Drainage Plan (PLAT.01.02-06) contained in Section 3 of this application submission. The interceptor is regularly maintained as per the Facility's Planned Preventative Maintenance Regime ("PPMR").</p> <p>The Welsh Water Trade Effluent Consent issued by Welsh Water is contained within Appendix I of this document. Platts will adhere to all conditions contained in the consent.</p>	Low	Contamination of controlled waters	Not significant if risk management measures are strictly adhered to



**Table 4: Amenity Risk Assessment (Cont.)**

Hazard	Receptors	Pathway	Risk Management	Probability of Exposure	Consequence	Overall Risk
<b>Noise and Vibration</b>						
Vehicle movements, tipping of waste and processing (pulverising) activities	Human population in surrounding area (see Section 2.3 of this ERA)	Noise – releases to air, vibration – through ground.  Facility is close enough to human sensitive receptors for noise to be potentially audible.	<p>The Facility is located within an industrial setting. The nearest residential receptors are located approximately 0.36km north of the Facility boundary.</p> <p>A Noise Impact Assessment (“NIA”) (Document Reference, PLAT.01.02/NIA) has been undertaken to assess the potential noise impact on nearby sensitive receptors and is contained within Section 11 of this application submission. The NIA determined that noise generating activities at the site were considered insignificant and therefore unlikely to have any adverse impact on human sensitive receptors.</p> <p>For completeness, a Noise Management Plan (“NMP”) (Document Reference PLAT.01.02/NMP) will be implemented as part of the EMS. This NMP details the measures and procedures in place to control noise from the proposed activities. The NMP should be read in conjunction with this ERA and a summary of the NMP is provided below.</p> <p>The Facility can be accessed via Miners Road or Davy Way and all vehicles will have to adhere to the site speed limit of 5mph. The vehicle route has been designed to limit the need to reverse on site. Vehicles may sound reversing beepers for 5-20 seconds. This is vital for the health and safety of all workers. Additionally, all unloading activities will be supervised by a Platts competent person to reduce the generation of noise.</p>	Low/ Moderate.  The risk management measures should prevent noise reaching the identified receptors	Possible noise nuisance	Not significant if risk management measures are strictly adhered to

**Table 4: Amenity Risk Assessment (Cont.)**

Hazard	Receptors	Pathway	Risk Management	Probability of Exposure	Consequence	Overall Risk
<b>Noise and Vibration (cont.)</b>						
Vehicle movements, tipping of waste and processing (pulverising) activities	Human population in surrounding area (see Section 2.3 of this ERA)	Noise – releases to air, vibration – through ground.  Facility is close enough to human sensitive receptors for noise to be potentially audible.	<p>All site plant and equipment will be operated by competent Platts personnel and in accordance with the manufacturer's specification. All plant and equipment will be covered by the PPMR which will be contained within the EMS. The PPMR will ensure adequate inspection and maintenance of any parts of the plant or equipment whose deterioration may give rise to increases in noise. A copy of the PPMR is contained in Section 7 of this application submission.</p> <p>The NMP proposes monitoring checks for the presence of noise at external areas of the Facility as part of the daily site checks carried out in addition to boundary noise monitoring on a 6 monthly basis. This will determine any changes in the intensity of sound over time and should the periodic noise monitoring suggest that on-site noise levels have increased, more comprehensive monitoring will be carried out.</p> <p>The NMP sets out emergency contingency measures in the event of extreme weather conditions, fire or explosion, staff absence and breakdown or malfunction of equipment. The measures detailed, which include reviewing scheduling, using assigned deputies and if necessary, the ceasing of operations using the emergency stop button, will ensure that potential noise emissions will continue to be managed in emergency scenarios.</p> <p>The procedure which will be implemented by Platts in the event that a noise complaint is received is also contained within the NMP and includes details on how the complaint will be investigated, corrective and preventative measures, evaluation of the implemented measures, feedback to the complainant and timescales for completing the above actions.</p>	Low/ Moderate.  The risk management measures should prevent noise reaching the identified receptors	Possible noise nuisance	Not significant if risk management measures are strictly adhered to

**Table 4: Amenity Risk Assessment (Cont.)**

Hazard	Receptors	Pathway	Risk Management	Probability of Exposure	Consequence	Overall Risk
<b>Pests</b>						
Pests (scavenger birds and animals)	Human population in surrounding area (see Section 2.3 of this ERA)	Via air (flies/scavenger birds) or land (vermin)	<p>Due to the nature of waste to be accepted, the attraction of pests, such as flies, vermin or scavenging animals and birds is considered unlikely. However, the permitted wastes could potentially become nesting or breeding sites if waste piles are not managed correctly.</p> <p>Incoming waste wood prior to processing is stored in enclosed trailers. Finished product ready for dispatch is stored externally in plastic wrapping preventing the formation of nests or breeding sites.</p> <p>Daily inspections of the integrity of the plastic wrapping will be undertaken and handling procedures will be implemented to prevent damage such as tearing to the plastic wrapping. In the event that damage is observed, the plastic wrapping will be replaced immediately.</p> <p>Additionally, the short turnaround time of all waste will prevent pest habitat formation.</p> <p>The Facility is predominantly surfaced with impermeable concrete and strict housekeeping standards will be upheld.</p> <p>Daily inspections of the Facility will be undertaken and any observed pests or evidence of the presence of pests will be monitored and recorded. In the unlikely event that pests or pest habitats are identified on site, a specialist pest management company will be appointed to provide advice and undertake any corrective and preventative action required.</p>	<p>Low</p> <p>The risk management measures should prevent litter, mud or pests reaching the identified receptors</p>	<p>Possible adverse health effects and nuisance</p>	<p>Not significant if risk management measures are strictly adhered to</p>

**Table 5: Accident Risk Assessment**

Hazard	Receptors	Pathway	Risk Management	Probability of Exposure	Consequence	Overall Risk
<b>Fire</b>						
Fire at the site.	Human and ecological sensitive receptors population in surrounding area (see Section 2.2 and 2.3 of this ERA)	Release to air – windblown dispersion in atmosphere	<p>The Facility will operate in accordance with Fire Prevention Plan (“FPP”) (PLAT.01.02/FPP) which is contained in Section 8 of this application. This FPP includes detailed fire control measures, however, a summary is provided below.</p> <p>The pre-acceptance and acceptance procedures will ensure no non-permitted waste is accepted at the Facility. Any such waste that is identified will be removed and quarantined.</p> <p>Fire detection alarm system (heat/smoke detectors) has been installed and is maintained/tested by a UKAS accredited company and in accordance with Fire and Rescue Service (“FRS”) recommendations. The pulverisers/chippers have a Grecon spark detection system which floods the chipper system with water if activated.</p> <p>Preventative maintenance on all equipment is undertaken as per the PPMR contained in Section 7 of this application submission to prevent any faults occurring.</p> <p>Designated smoking areas are in place with smoking prohibited in all buildings and waste storage areas.</p> <p>Emergency procedures including emergency response in the event of a fire will be implemented as part of EMS.</p> <p>Training will be provided to all personnel in relation to preventing fires and identifying fire risks with provision of manual extinguishers. Firefighting training will be provided to nominated personnel.</p>	<p>Moderate</p> <p>The risk management measures should prevent any release from reaching the identified receptors.</p>	Combustion gases (smoke) and localised nuisance.	Not significant if risk management measures detailed in the FPP are strictly adhered to

**Table 5: Accident Risk Assessment (Cont.)**

Hazard	Receptors	Pathway	Risk Management	Probability of Exposure	Consequence	Overall Risk
<b>Fire (Cont.)</b>						
Releases of potentially contaminated firewater.	Human and ecological sensitive receptors population in surrounding area (see Section 2.2 and 2.3 of this ERA)	Via drainage networks	<p>Firewater containment measures are detailed in the FPP (PLAT.01.02/FPP) submitted in Section 8 as part of this permit application submission.</p> <p>Firewater will be contained using bunds/booms and the firewater will then be tankered off site to an appropriately permitted premise.</p> <p>Drain mats will be deployed to prevent any firewater from entering the drainage system.</p>	<p>Low</p> <p>Risk management measures should prevent any release from reaching the identified receptors</p>	Contamination of controlled waters	Not significant if risk management measures detailed in the FPP are strictly adhered to
<b>Spillage of Potentially Polluting Substances</b>						
Leakage of fuel oil from haulage/site vehicles	Human and ecological sensitive receptors population in surrounding area (see Section 2.2 and 2.3 of this ERA)	To ground, percolation to groundwater or via drainage network	<p>Site plant and haulage vehicles will be subject to regular maintenance and servicing to ensure that they are in good condition to limit the likelihood of fuel leakage.</p> <p>All storage and processing areas, as well as vehicle routes will be surfaced with impermeable concrete to prevent any fuel spillage from entering the ground or groundwater.</p> <p>Regular site inspections will be undertaken to observe any spillages and to undertake any remedial action required as part of the EMS Site Checks. Any spillage will be dealt with in accordance with the emergency spill response procedure, including the deployment of booms and drain mats, which will form part of the EMS. This will prevent any fuel from entering the Facility's drainage network. All employees will be suitably trained in the procedure.</p>	<p>Low</p> <p>Risk management measures should prevent any release from reaching the identified receptors</p>	Contamination of controlled waters	Not significant if risk management measures are strictly adhered to



**Table 5: Accident Risk Assessment (Cont.)**

Hazard	Receptors	Pathway	Risk Management	Probability of Exposure	Consequence	Overall Risk
<b>Spillage of Potentially Polluting Substances (Cont.)</b>						
Loss of containment of diesel during transfer from bulk tanker and during transfer to mobile plant/equipment.	Human and ecological sensitive receptors in surrounding area (see Section 2.2 and 2.3 of this ERA)	To ground, percolation to groundwater or via drainage network	<p>During any transfer of diesel, checks will be undertaken to ensure all transfer equipment is intact and that there is sufficient capacity in the tank or plant or equipment to which diesel is being transferred. A member of Platts will supervise at all times.</p> <p>Any potentially polluting substances will be appropriately bunded to ensure a minimum capacity of 110% of the tank capacity.</p> <p>The diesel tank is positioned away from site traffic and barriers will be erected to prevent any potential collisions.</p>	Low  Risk management measures should prevent any release from reaching the identified receptors	Contamination of controlled waters	Not significant if risk management measures are strictly adhered to
Loss of containment of other smaller quantities of potentially polluting materials, such as vehicle detergent.			<p>Other potentially polluting materials (vehicle detergent) is stored on site in smaller quantities on appropriate bunding.</p> <p>Tank/containment vessels and bunding integrity and maintenance checks will be undertaken as part of the EMS Site Checks.</p> <p>In the event of a spill, site personnel will be trained in the emergency spillage response procedure which will form part of the EMS.</p>			

**Table 5: Accident Risk Assessment (Cont.)**

Hazard	Receptors	Pathway	Risk Management	Probability of Exposure	Consequence	Overall Risk
<b>Loss of Power/System Failure</b>						
Accumulation of waste materials creating potential for dust emissions	Human population in surrounding area (see Section 2.3 of this ERA)	Release to air – windblown dispersion	<p>The Facility has pre-determined storage capacity limits which will not be exceeded in the event of major system failure/loss of power.</p> <p>The PPMR includes maintenance and inspection of all process equipment to ensure good working order to reduce the risk of complete system failure.</p> <p>Competent personnel will inspect all equipment prior to recommencement of activities and the acceptance of waste.</p>	<p>Low</p> <p>Risk management measures should prevent any release from reaching the identified receptors</p>	Potential dust nuisance	Not significant if risk management measures are strictly adhered to
<b>Vandalism</b>						
Vandalism or unauthorised access resulting in any of the above.	Any of the above.	Any of the above.	<p>The Facility is secured by perimeter fencing and large lockable entrance gates. The Facility also benefits from security lighting. Personnel will be present at Facility on a 24/7 basis.</p> <p>A remote closed-circuit television (“CCTV”) monitoring system is in place which will survey all areas of the Facility.</p> <p>Key members of staff are also on call to attend site out of normal working hours (9am-5pm) if required.</p>	<p>Low</p> <p>Risk management measures should prevent any release from reaching the identified receptors</p>	Any of the above.	Not significant if risk management measures are strictly adhered to

## **5. SUMMARY**

### **5.1. Results of the Assessment**

- 5.1.1. The results of both the amenity and accident risk assessments (Tables 4 and 5) indicate that none of the risks relating to the operation of the proposed Facility will be significant if it is operated and managed in accordance with the EMS, PPMR, specific management plans, in addition to the risk management measures detailed above.
- 5.1.2. As the Facility is proposing to store combustible waste as defined by NRW, a risk of fire has been identified. Therefore, a Fire Prevention Plan (PLAT.01.02/FPP) has been prepared and is contained within Section 8 of this application submission. The Fire Prevention Plan details the appropriate mitigation measures to address the risk of fire at the Facility and should be read in conjunction with this ERA.
- 5.1.3. Due to the nature of the waste to be processed at the Facility and the pulverising activity proposed, a Dust Management Plan (PLAT.01.02/DMP) has been prepared and is contained in Section 9 of this application submission. The Dust Management Plan outlines the potential sources of dust emissions and the appropriate mitigation measures to address the risk of dust emissions reaching sensitive receptors. The Dust Management Plan should be read in conjunction with this ERA.
- 5.1.4. As processing operations proposed at the Facility have the potential to generate noise, a Noise Impact Assessment (PLAT.01.02/NIA) and associated Noise Management Plan (PLAT.01.02/NMP) have been prepared and are contained within Section 11 of this application submission. The Noise Impact Assessment informs the Noise Management Plan which details the potential sources of noise emissions at the Facility and the control measures implemented in order to address the risk of noise emissions from reaching sensitive receptors. The Noise Management Plan and Noise Impact Assessment should be read in conjunction with this ERA.
- 5.1.5. At the request of NRW, a preliminary ecological appraisal was undertaken by qualified Ecologists and is contained within Section 12 of this application submission. It was determined that with regards to the likely impacts on identified key ecological receptors, as there will be no change to the infrastructure at the Facility and therefore no loss of existing habitat, no adverse impacts are anticipated on Great Crested Newts, bats, or nesting birds. Consequently, the ecological report did not identify any further recommendations for surveys or mitigation measures associated with the key ecological receptors identified

### **5.2. Conclusion**

- 5.2.1. The risks in terms of accident and amenity risk can be considered not significant providing all risk management measures are implemented and strictly adhered to

## **APPENDIX I**

### **TRADE EFFLUENT CONSENT**

Platts Agriculture Ltd,  
Miners Park,  
Llay Industrial Estate,  
Llay,  
Wrexham,  
LL12 0PJ

18<sup>th</sup> March 2021

Dear Occupier,

Ref:- Disposal of Wastewater from vehicle washing at Platts Agriculture Ltd, Llay Industrial Estate, Llay, LL12 0PJ.

Thank you for your recent enquiry regarding an authorisation to discharge trade effluent to the public foul sewer from the above address. Based on the information provided, I can confirm that authorisation is given to discharge the trade effluent into the public foul sewer, subject to the following conditions and not otherwise:

1. The premises from which the trade effluent may be discharged is: Platts Agriculture Ltd, Llay Industrial Estate, Llay, LL12 0PJ.
2. The trade effluent to be discharged is derived from vehicle washing.
3. The maximum volume of trade effluent that may be discharged shall not exceed 2.4 m<sup>3</sup> per day.
4. The highest rate at which the trade effluent may be discharged shall not exceed 0.3 l/sec.
5. The trade effluent is expected to contain traces of suspended solids and traces of the detergents, all heavily dilute, biodegradable & non-acidic. No gross solids may be discharged to sewer.
6. The pH of the effluent must be between 5 and 10.
7. There must be no visible signs of oil or grease in the discharge.
8. The wastewater must be discharged to the public sewer via a Silt/Oil Interceptor tank. The tank must be maintained regularly, and maintenance records including Duty of Care paperwork must be kept and available for inspection on request.



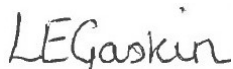
9. Please ensure that the discharge is made to foul sewer only and that there is no risk of the contamination of any surface water drainage.
10. Flows must be introduced into the public sewer in such a way that will not affect the free flow of its contents, for example, settlement of suspended solids or surcharging upstream.
11. A 3 metre gravity section must be incorporated into the design before connection to the public sewer should the discharge be pumped.
12. There will be no attempt to identify the volumes of domestic sewage and this trade effluent for charging purposes. Both volumes will be discharged at the current domestic rate with no minimum charge for trade effluent.
13. This permission is given on the understanding that:
  - a) it may be reviewed from time to time in accordance with the frequency applying in respect of a trade effluent consent issued under the Water Industry Act 1991, section 124.
  - b) Dwr Cymru-Welsh Water may review its Trade Effluent Policy and require a review of this permission subject to the restrictions in a) above.
  - c) If the nature of the discharge is changed then Dwr Cymru-Welsh Water must be informed of this and shall be entitled to review the permission.

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The standard trade effluent consent application fee, currently £358.12 (zero rated for VAT), is payable for the processing of the authorisation application as per the Dwr Cymru-Welsh Water Scheme of Charges. You will be invoiced for this amount in due course.

In the meantime, if you have any queries or should the operation change in any way so as to affect the nature and volume of wastewater for disposal, please contact Raymond Jones, Trade Effluent Officer on 07824845827.

Yours sincerely



Louise Gaskin

Wastewater Science Manager