

Notice of request for more information

Environmental Permitting (England and
Wales) Regulations 2016

Notice requiring further information

To:

New Horizon Plastics Co Ltd
91 Soho Hill
Birmingham
United Kingdom
B19 1AY

Application number: PAN-014178

Natural Resources Wales, in exercise of its powers under paragraph 4 of Part 1 of Schedule 5 of the above Regulations, requires you to provide the information detailed in the attached schedule. The information is required in order to determine your application for a permit, dated **03/08/2021**.

The information requested should be sent to the following address by **01/03/2022**.

Information should be sent to louise.bailey@naturalresourceswales.gov.uk

Name	Date
Louise Bailey	08/02/2022

Authorised on behalf of Natural Resources Wales

Schedule

Noise & Vibration Management Plan (CAS-2570-I NIA v1.3)

We have assessed the information provided within version 1.3 of the noise and vibration management plan (referred to as “the NVMP”) and have the following points that need to be addressed.

Relevant guidance

1. Section 6.2.4 states; *“This is further supported by that fact that rating levels at the noise sensitive receptors also fall well within the within the WHO criteria for external noise levels.”* This is not relevant for industrial noise assessment.

ACTION: update the NVMP to remove reference to the WHO criteria for external noise levels. The relevant guidance is H3 and BS4142.

Noise Modelling

2. Simple noise attenuation calculations have been used rather than detailed modelling. For a complex site like this, with a large number of stationary and mobile plant; shredders, excavators, loading shovels etc. detailed site noise modelling of would be the expected assessment method.

Due to the use of simple noise attenuation calculations, terrain has not been considered.

Section 6.2.2 of the NVMP states; *“Screening is provided to the receptors via the surrounding buildings which comprise a mix of industrial and commercial buildings of different heights varying between approximately 4-12m. BS5228: Part1: 2009 considers that should the noise source be obscured from the receptor, an attenuation figure of 10dB may be expected as a rule of thumb. In actuality, given the anticipated path difference, the actual figure is likely to be considerably higher.”* The attenuation figure, nor the “actual figure” cannot be confirmed (or verified by NRW) with simple noise calculations alone.

ACTION: Either

- a. complete full noise modelling in line with BS4142 taking into account the points in this notice; or

- b. if you wish to use calculations not modelling as the basis for your assessment, provide justification for doing so and ensure the calculations have taken into account all the points within this notice.

Background sound monitoring

3. The background sound monitoring has been carried out for 4.5 hours on 1 day (during a weekday), however, the NVMP states the site operates 7 days a week (0700-1900), therefore background sound levels used in the NVMP are not representative of the full operating time i.e., weekdays and weekends). In addition, Table 1.1 states that maintenance may be carried out outside of these hours (Monday to Sunday = 06:00 –07:00 & Monday to Sunday = 19:00 – 21:00). This is classed as a night-time reference period according to BS4142. The background sound monitoring must be representative of the proposed operating hours of the site, including maintenance/cleaning operations.

ACTION: carry out background sound monitoring that is representative of the sites operating, maintenance and cleaning periods.

4. Based on the information in the NVMP it is not clear if the plant was operational or not during the background sound monitoring.

ACTION: update the NVMP to state if the plant is optional or not when the background sound monitoring takes place.

Sources of Noise

5. Section 6.1.2 states; *“It is considered that given the existing operations are enclosed within the waste treatment buildings, it is only relevant to assess the proposed, external noise sources in this instance. It must be also be considered that internal operations are currently permitted.”* The noise assessment only includes ‘new’ sound sources and external ones. The sound from the permitted activity on-site has not been assessed.

H3 clearly states; *“When you apply for a variation, do not include noise from the existing site (before changes) as part of the background or the residual sound levels. Your noise impact assessment must consider all the noise resulting from the proposed variation – the existing site and the variation together. Show both components clearly and then add them together to give a new total for site noise at the receptors. The impact assessment will be based on this new value, known as the ‘specific level’ in BS 4142.”*

ACTION: update the NVMP ensuring that all sound sources are identified, and the plant noise is assessed as a whole, including lorry movements delivering/removing waste etc.

6. Section 6.1.4 states; *“With regards to the plastics wash plant line, it has not been possible in this case for the manufacturer to provide noise levels for the process due to it being a bespoke design and manufactured in China. In addition, there are no sites using the same system operating nearby where noise levels could be taken. It is therefore considered that noise levels from historic Oaktree reports comprising similar items of plant should be considered suitable. Whilst these will not be from the same manufacturer, these will allow for a preliminary assessment of noise impacts to be made. It should be noted that the historic measurements are from a larger plant and therefore are likely to significantly overestimate the impact.”*

ACTION: update the NVMP to provide full details as to where and how you have obtained the noise spectra used for comparison.

7. Section 6.1.5 states; *“Whilst Oaktree do not hold levels for the dehydrator, friction cleaner or pre-wash it is understood from conversation with the operator that the noise level from these items of plant is negligible when compared to the noise level from the adjacent items. As stated previously, it should be noted that the historic measurements are from a larger plant and therefore are likely to significantly overestimate the impact.”* These items of plant form part of the plastic washing process.

ACTION: update the NVMP to include full details for all items of plant on-site and should be assessed for impact in line with BS4142.

8. Section 6.1.6 states; *“As per the plastics wash plant, it has not been possible in this case for the manufacturer to provide noise levels for the tyre recycling process. The proposed tyre recycling plant is also a bespoke design manufacturing by Lanrry Recycling who are also based in China. A video of the plant can be sent to NRW on request if required. In addition, there are no sites using the same system operating nearby where noise levels could be taken. It is therefore considered that noise levels from historic Oaktree reports will be utilised. Whilst these will not be from the same manufacturer, these will allow for a preliminary assessment of noise impacts to be made. It also considered the items of plant overleaf which formulate the plant are considered the noisier items.”*

ACTION: update the NVMP to provide full details as to where and how they have obtained the noise spectra used for comparison and confirm that the proposed tyre recycling process is only comprised of the noise sources listed in Table 6-3 of the v1.3 NVMP.

Acoustic correction

9. A +3dB tonality acoustic correction has been applied within the calculations.
This may not be sufficient due to nature of the operation.

ACTION: update the NVMP to include full justification for the choice of acoustic correction used.