

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 **15/12/2021**.

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

Name	Date
Louise Bailey	01/12/2021

Authorised on behalf of Natural Resources Wales

Schedule

Environment Management System (CAS-2570-A EMS v1.5).

1. Condition 1.1.1 of the permit requires that the operator shall manage and operate the activities in accordance with a written management system that identifies and minimises risks of pollution, including those arising from operations, **maintenance**, accidents, incidents, non-conformances, closure and those drawn to the attention of the operator as a result of complaints.

Version 1.5 of the EMS no longer contains a section on maintenance (it was previously section 3.9 in v1.3)

ACTION: reinstate a section on maintenance within the EMS.

2. Operations in windy conditions- Section 4.7.2 of the EMS states:

When staff carry out inspections for litter on and off site they will collect the litter and place it in a skip for recovery before the end of the working day. Regular checks including four over a 24-hour period of the areas immediately beyond the site boundary will be carried out by site operatives. **In the event of high winds, the frequency of checks may increase to reduce the risk of complaints.**

However, this is contradicted by section 5.7.1 of the EMS:

High winds - **There will be no sorting, processing or treatment of any wastes which are likely to be blown around during conditions of high winds.**
Vehicles leaving the site will be sheeted to comply with the requirements of the Duty of Care legislation.

ACTION: Confirm which is correct and ensure that both parts of the document are consistent.

Environmental Risk Assessment (CAS-2570-D ERA v1.5)

3. Section on litter includes the statement:

Use the complaint's procedure from the EMS (Section 4.10) to ensure any **odour** complaints are addressed and substantiated.

ACTION: correct this to "litter".

Noise & Vibration Management Plan (CAS-2570-I NIA v1.2)

4. Section 2.2 List of receptors

Only human/ residential receptors are listed, no assessment has been made for environmental receptors i.e. The Dee Estuary (Wales) Ramsar, The Dee Estuary (Wales) SPA, Dee Estuary / Aber Dyfrdwy (Wales) SAC and the Dee Estuary / Aber Afon Dyfrdwy SSSI.

While BS4142 only refers to human receptors, the Site Specific Risk Assessment includes receptors not listed in section 2.2 and refers to reader to the NVMP for the mitigation to reduce the impact of noise pollution.

ACTION: amend the Noise and Vibration Management Plan to include the environmental and recreational receptors, and the specific mitigation required to prevent harm to those receptors.

5. Figure 5.1 Site location and noise monitoring position

This plan does not show the site locations in their entirety. Only a small part of Site B is visible but is not identified in any way to make it clear where the site boundary is.

ACTION: amend this figure to show the three monitoring locations and both the whole of Sites A and B

6. Assessment of noise impact

To enable us to fully assess your conclusions on impact of noise from the proposed activities at the site provide the following:

- a. weather data from time of monitoring if you hold anything additional to the information in table 5.1
- b. the results of the background monitoring survey
- c. data modelling files (QSI data exchange format) or the noise attenuation calculation files

ACTION: provide the above information/files

Fire Prevention & Mitigation Plan (CAS-2570-B FPP v1-4)

7. Both Table 12.1 and 12.2 are called *Firewater Containment Calculation SITE A* on the list of tables. Table 12.2 should refer to Site B.
8. Section 1.1.1 does not include the tyre recycling activity. It only mentions the physical treatment facility for non-hazardous plastic waste.
9. Sections 1.6.1, 2.6.4, 2.6.5, 2.6.6 and 9.2.1 have not been updated following the changes to operating hours. Other parts of the FPMP make references to shift changes, rather than overnight ceasing of activities including the table within drawing CAS/2570/03- Site layout and Fire Plan, which is appended to the majority of the supporting documents. you need to make sure the operating times, and any operating procedures that are impacted by the change is updated.
10. Table 1.2 – Receptor Table lists the Dee Estuary as a Ramsar only. It is also a SAC, SPA and SSSI and should be referenced as such.
11. Section 5.1.1 does not include the End of Life Tyres as a combustible waste.
12. Table 6.1 states that Interlocking concrete legio blocks are used in Areas 1-3, however this appears to refer to the original site layout. Based on the updated site layout and fire plan, these blocks are used elsewhere.
13. Section 10.5.4 refers to a “load” speaker, rather than “loud” speaker

ACTION: make the amendments to your FPMP as listed on points 7-13 above, ensuring that the updated sections of your FPMP meet the standards as set out in the guidance - “Fire prevention & Mitigation Plan Guidance – Waste Management”. For ease of review please highlight or list separately the sections that have been updated.