

## Compliance Assessment Report CAR\_NRW0046489

**Permit being assessed:** YP3632EM.

**For:** Sandycroft Poultry Processing, **held by:** 2 Sisters Food Group Limited

**At:** VION Sandycroft Glendale Avenue , Sandycroft, DEESIDE, Clwyd, CH5 2QP.

**Type of assessment:** Report/Data Review,

**Reason:** Routine.

**On:** 28/02/2025.

**Parts of permit assessed:** Improvement Condition 16a.

**NRW Lead Officer:** Rebecca Harwood.

**Report sent to:** Site Director, Site Director, on 17/03/2025.

### 1. Summary of our findings (full details in section 4)

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR2E - Installations - Operations - Improvement programme	Action only (X)	

Result types are explained in more detail in the 'Important Information' section below.

Total non-compliances recorded	Total non-compliance score
0	0

How we use the non-compliance score to calculate your annual fee is explained in the 'Important Information' section below.

### 2. What action is required?

Criteria	Action needed	Complete by
IR2E	see text below	21/05/2025

Compliance criteria codes are listed in the 'Important information' section below.

### 3. What will happen next?

Any non-compliance we have identified and recorded on this form is an offence. It can result in criminal prosecution and/or suspension or revocation of your permit.

**At this time, we do not intend to take any further action.**

This statement does not stop us from taking additional enforcement action if further relevant information comes to light or offences continue.

## 4. Details of our assessment

This Compliance Assessment Report follows receipt of the Noise Impact Assessment conducted by the Operators consultant, SLR, during September and October 2024, in response to Improvement Condition 16a.

Improvement Condition 16a states:

*Following establishment of a routine steady operation following the construction of the new covered loading bay, the Operator shall undertake a noise impact assessment for the whole site following BS4142:2014 and guidance set out in [Noise and Vibration Management: Environmental Permits](#). The assessment should include an objective assessment of narrow band (FFT) measurements to identify any tonal elements from on-site sources and off-site at sensitive receptors.*

*The assessment should include consideration of the Welsh Government's Noise and Soundscape Action Plan 2018-2023.*

*Upon completion of the work, a written report shall be submitted to Natural Resources Wales for approval.*

The final report was submitted to NRW on the 7<sup>th</sup> January 2025. The associated noise modelling files were received from the Operator on the 3<sup>rd</sup> February 2025.

The report and associated files were reviewed by NRW's Air Quality and Noise Team as well as the local regulatory officer.

As the site operates 24/7 and cannot be easily shutdown, a surrogate monitoring location was chosen for the baseline background noise assessment. The proposal to use a surrogate location was agreed with NRW prior to the assessment being undertaken.

Monitoring was undertaken at residential properties as well as on site to identify specific plant that may be causing an offsite impact.

Table 6-4 summarises the results from the assessment (without mitigation) and shows that at the closest receptor and at the front of the building the impact during the daytime is +10dB and night time is +13dB above background which indicates a significant adverse impact. At the rear of the building the impact during the daytime is +15dB and night time is +21dB above background which indicates a significant adverse impact.

The noise associated with the chiller unit located within the despatch yard and the extraction hood located on roof of the breast meat room are the main contributors to the predicted specific sound level during the daytime and night time.

Section 7.0 outlines potential mitigation that could be employed on-site to reduce noise impacts at the identified receptors. These include an acoustic barrier and potential changes to the extraction hood.

The report states that *a planned upgrade to the Site would remove the chiller units and extraction hood from Site in the coming years. Therefore, the significant contributor to the predicted noise levels would be removed completely. It is expected therefore that noise from Site could be drastically reduced if planned upgrades are implemented.* However, mitigation options should be implemented to reduce their noise impact in the short term.

It is also noted that even if mitigation is installed as described in Section 7.0, there is still a predicted impact at night time at the closest receptor of +13dB above background, which indicates a significant adverse impact.

Whilst the mitigation shows a significant improvement to the overall acoustic environment at receptors, no firm commitments have been made to install these items on site. The report does not include full details or timelines for any of the items of mitigation.

The glycol chiller located next to Bay 1 has been enclosed, however, reports from residents suggest that although the sound character has altered this is still causing an off site impact. NRW reviewed the enclosure during a site visit on the 10th March 2025 - see CAR NRW0046567.

The requirements of IC16a have been met. However, further information is required from the Operator relating to the mitigation measures identified within the Noise Impact Assessment and further work is required to complete IC16b - Noise Management Plan.

**Action 1:** NRW require a detailed proposal as to what works are to be undertaken in order to mitigate the impact from the identified noise sources. This should include specifications, drawings and timelines of works to be undertaken. This should be submitted to NRW by 23/04/2025.

**Action 2:** A BAT and appropriate measures assessment of the activities at the site should be completed as part of IC16b. This should form part of the Noise Management Plan and should be submitted to NRW by 21/05/2025.

If you have any queries about this report, or to discuss completion of any actions, please contact the NRW Officer named above.

## Important information

### Legal status of this report

Your permit is issued to you under the Environmental Permitting Regulations. You have a responsibility to comply with the conditions of your permit and prevent pollution/harm of the environment. You must also ensure that you comply with any other relevant legislation that may apply to your site's operations.

This report explains the findings of our assessment and any action you are required to take. We categorise non-compliance using our guidance for assessing non-compliance at regulated sites.

When we find potential non-compliance/s we will normally give you advice on how to maintain compliance.

To correct non-compliance, we may:

- require you to take specific actions
- issue a notice
- review the conditions of your permit.

Any advice and guidance we give will be without prejudice to any other enforcement response that we consider may be required.

### Assessment results and non-compliance categories (used in section 1):

Assessment result	Description
Assessed (A)	Assessed or assessed in part, no evidence of non-compliance found
Action only (X)	Action only relating to the activity assessment
Ongoing (O)	Ongoing non-compliance, not scored

Non-compliance category	Description	Score
C1 Major	Potential to have a major, serious, persistent and/or extensive impact or effect on the environment, people and/or property	60
C2 Significant	Potential to have a significant impact or effect on the environment, people and/or property	31
C3 Minor	Potential to have a minor or minimal impact or effect on the environment, people and/or property	4
C4 No environmental impact	Non-compliance at a regulated site that cannot foreseeably have any impact on the environment, people and/or property	0.1

### How we use assessment scores

The number and severity of non-compliances recorded in a year will affect your annual subsistence fee the following year. A non-compliance factor is added to your site's Operator

Performance Risk Appraisal (OPRA) score when we calculate your fee to reflect the additional resource we use to assess permit compliance.

**If your assessment result in Section 1 is suspended, what does this mean?**

In line with our guidance, we may suspend scores for up to six months to allow time for remedial action to be taken. Suspended scores will be re-instated if the action is not completed.

**Full list of Industry compliance criteria** (used in section 1 and 2):

**1. Management**

- IR1A – General management
- IR1B – Finance (only applicable to Landfill)
- IR1C – Energy efficiency
- IR1D - Efficient use of raw materials
- IR1E - Avoidance, recovery and disposal of wastes produced by the activities
- IR1F - Multiple operator installations

**2. Operations**

- IR2A – Permitted activities
- IR2B – The site
- IR2C – Operating techniques
- IR2D – Technical requirements
- IR2E – Improvement programme
- IR2F – Pre-operational conditions
- IR2G – Landfill engineering (only applicable to Landfill)
- IR2H – Waste acceptance (only applicable to Landfill)
- IR2I – Leachate levels (only applicable to Landfill)
- IR2J – Closure and aftercare (only applicable to Landfill)
- IR2K – Landfill gas management (only applicable to Landfill)

**3. Emission and Monitoring**

- IR3A – Emissions to water, air or land
- IR3B – Emissions of substances not controlled by emission limits
- IR3C – Odour
- IR3D – Noise and vibration
- IR3E – Monitoring
- IR3F – Pests
- IR3G – Air quality management plans
- IR3H – Monitoring for the purposes of the Industrial Emissions Directive (this heading includes Large Combustion Plants)
- IR3I – Fire

**4. Information**

- IR4A – Records
- IR4B – Reporting
- IR4C – Notification

**Enforcement response**

Any non-compliance with a permit condition is an offence and we may take legal action against you. Action we take can include prosecution, serving a notice on you and/or

suspension or revocation of your permit. See our Enforcement and Sanctions Guidance for further information.

### **Data protection notice**

You should make sure that anyone named in this report knows that the information it contains will be processed by Natural Resources Wales to fulfil its regulatory and monitoring functions and to maintain the relevant public register(s).

We may also use and/or disclose the report in connection with:

- offering or providing you with our literature or services relating to environmental matters
- consulting with the public, public bodies and other organisations (e.g. Health and Safety Executive, local authorities) on environmental issues
- carrying out statistical analysis, research and development on environmental issues
- providing public register information to enquirers
- investigating possible breaches of environmental law
- assessing customer service satisfaction and improving our service
- Freedom of Information Act or Environmental Information Regulations requests.

We may also pass it on to our agents or representatives to do these things on our behalf.

### **Disclosure of information – this report will be available to view on-line**

If you think this report contains commercially confidential information that should not be placed on our public register, you must contact your local Natural Resources Wales office within **fifteen working days** of receiving this report, using the contact details in the accompanying email or letter. You must give a full explanation of why it should not be added to our public register, including specifying which information is commercially confidential. We will assess your request and respond to you within twenty working days to let you know if we agree to your request.

### **What do I do if I disagree with the report or have a complaint?**

If you disagree with this compliance assessment report, you should contact the lead officer without delay to discuss your concerns.

If you are unable to resolve the issue with the lead officer or their line manager you should contact our Customer Contact team on 0300 065 3000 (Monday to Friday 08:00 to 18:00), or email [enquiries@naturalresourceswales.gov.uk](mailto:enquiries@naturalresourceswales.gov.uk) for details of how to raise your dispute further through our Complaints and Commendations procedure.

If you are dissatisfied with our response, you can contact the Public Services Ombudsman for Wales by phone on 0300 7900203 or by email at [ask@ombudsman.wales](mailto:ask@ombudsman.wales)

### **Welsh Language Standards**

We are committed to establishing Natural Resources Wales as a naturally bilingual organisation. We will provide compliance reports in your preferred language.