

# Notice of request for more information

## The Environmental Permitting (England & Wales) Regulations 2016

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Director  
Ford Energy from Waste Limited  
Thames House  
Oxford Road  
Benson  
Oxfordshire  
OX10 6LX

Application number: EPR/MP3904BD/A001

The Environment Agency, 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 duly made on 14/04/2021.

Send the information to either the email or postal address below by 08/10/2021. If we do not receive this information by the date specified then we may treat your application as having been withdrawn or it may be refused. If this happens you may lose your application fee.

Email address: [psc@environment-agency.gov.uk](mailto:psc@environment-agency.gov.uk).

Postal address:  
Permitting and Support Centre  
Quadrant 2  
99 Parkway Avenue  
Parkway Business Park  
Sheffield  
S9 4WF

Name	Date
Permitting Officer	11/08/2021

Authorised on behalf of the Environment Agency

**Notes**

These notes do not form part of this notice.

Please note that we charge £1,200 where we have to send a third or subsequent information notice in relation to the same issue. We consider this to be the first notice on the issues covered in this notice.

The notes in italics that appear after information requests in the attached schedule do not form part of the notice. The notes are intended to assist you in providing a full response.

## Schedule

Please provide further information in response to the following points:

### Noise Impact Assessment

- 1) Provide a revised Noise Impact Assessment (NIA) addressing the following points:
  - (a) A revised baseline sound survey is required to determine the background sound levels at the nearest sensitive receptors (NSRs). This must include both week and weekend, day and night periods. Monitoring locations must be representative of the background sound climate at the NSRs.
  - (b) Receptors and sources should be modelled at appropriate heights to be representative.
  - (c) Additional receptors must be included to represent The Landings, the proposed residential scheme located to the west of the proposed installation.
  - (d) Provide additional information in relation to the 'benchmark measurements' made of sound sources at the existing Lakeside EfW facility in Slough, in particular for the Air Cooled Condensers (ACCs) (including, but not necessarily limited to: source dimensions and the distance between the plant and measurement microphone).
  - (e) Provide further explanation of how the ACCs have been modelled and how they are configured in relation to the screen.

*Note 1: Despite the baseline survey being undertaken, the majority of background sound levels have been derived based on noise modelling, which assumes road traffic is the dominant sound source at NSRs. We do not consider data obtained by this method to be sufficiently technically robust, as there is no established relationship between ambient and background sound levels.*

*All weekend data obtained was not suitable for use, due to inclement weather conditions. The site will operate on a 24/7 basis, and the data obtained does not represent the potentially more sensitive Saturday/Sunday day and night periods.*

*Short-term data was measured during a weekday daytime period only, and does not represent night-time or weekends. Also, not all locations used for the attended monitoring survey on Thursday 6th February 2020, are considered to be representative of the NSRs.*

*Long-term data was obtained at three locations, but two of these (LT1 & LT2) were on the site itself, and were more influenced by activities from the existing waste transfer station facility than would have been likely at the NSRs. There is significant variation in the background sound levels measured at LT3, indicating the potential influence of undocumented activity on the survey data at this location.*

*Note 2: The assessment has considered receptors at ground floor height only, for private dwellings, we would expect receptors to be included at 4m height to represent 1st floors where these exist. These need to be assessed during daytime and night-time periods.*

*Heavy Goods Vehicle (HGV) sources have been modelled at 1m height above ground level, which is not representative for this type of source. We would expect sound to be emitted at a height of 2m.*

*Note 3: The assessment has not considered future receptors to the western boundary of the site associated with The Landings, the proposed residential scheme with outline planning approval granted by Arun District Council (F/4/20/OUT). Some receptors associated with this development will be closer to the proposed site than current receptors included in the model.*

*Note 4: The NIA makes reference to 'benchmark measurements' made of sound sources at the existing Lakeside EfW facility in Slough. However, it is not clear how the sound source data was obtained.*

*Note 5: The method for modelling the ACCs is not clearly described. The CadnaA model provided shows a horizontal area source at 8m absolute height and a screen at 23.5m absolute height around them. This would result in the screen extending 15m above the top of the ACCs. It is not clear from the description of the source data what the height of the noise generating element of the ACCs will be, and in our experience it may be higher than the 8m assumed in the model, this would give rise to higher specific levels at receptors. We require clarification on this configuration, in particular on the ACCs primary sound transmission paths.*