EXISTING NOISE & VIBRATION MANAGEMENT PLAN

The Breakers Yard, Barracks Road, Assington CO10 5LP

Assington Autos Ltd

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1 <u>Introduction</u>

1.1 **Executive summary**

1.1.1 Assington Autos Ltd have made and are in the process of making the following improvements to their operations which will reduce noise issues at the site not identified in the existing Noise Management Plan for the site which is dated September 2020 produced by Assington Autos Ltd. The points below detail the existing and planned improvements to be made to reduce noise and vibration issues from the site.

1.2 Existing improvements made

- 1.2.1 The following improvements have been made within the last 12 weeks of this assessment.
 - i) Replaced all petrol cutting machinery with new battery powered cutting equipment (5 in total)
 - ii) Committed to relocate operations 150m 200m to the south of the site and erect numerous acoustic walls, buildings which will significantly reduce noise emissions arising from the site. This is evident from a pending planning permission and permit variation undergoing determination by the Council and Environment Agency (EA).
 - iii) Replaced the compressor located on the green car depollution rig with a newer model (BOGE 2022) reducing noise and emissions associated with this item of equipment.
 - iv) Replaced all steel tracked excavators with rubber attachments thus reducing the noise emitted during the movements of this plant.
 - v) Replace new engines and fit restrictors including white noise reversing alarms into all forklift trucks, this will limit their movement across site to 5mph and stop any high pitch beeping noises.
- 1.2.2 Accompanying this plan are two models, an existing model based on information recorded from the site by Thomas Benson of Oaktree Environmental Ltd on

21/03/2022, this information includes all mobile and fixed mechanical plant being used at the time. The other model demonstrates the above measures being overlaid which when the two models are compared shows a slight improvement. Within the models are the manufacturer sound power noise ratings are for the newly purchased equipment.

1.3 **Proposed/planned improvements for 2023**]

- 1.3.1 Further improvements are planned for the site with timescales shown below:
 - i) Replace older two-car vehicle transporters with new four-vehicle transporters which will reduce the number of movements to/from the site and also have much more environmentally emissions associated with the vehicle by 30/06/2023
 - ii) Replace the engine on the car baler with a much quieter / newer piece of equipment reducing the low pitch continuous noise associated with this item of equipment within 3 months following issue of either planning permission or permit determination, whichever is the soonest.
 - iii) Relocation and redevelopment of the site and infrastructure including moving the car baler, storage/tipping areas, HGV loading areas, enclosures for cutting vehicle parts, erection of 4.8m concrete walls for acoustic screening. The above will move approximately 150m south of the current location. In addition to this, 3 no. large HGV servicing buildings will be erected which will further screen noise. It is proposed these works would be complete within 3 months following issue of either planning permission or permit determination, whichever is the soonest.
- 1.3.2 To demonstrate the above improvements will be suitable from a planning and permitting perspective, a noise impact assessment (NIA) and separate proposed noise management plan (NMP) has been submitted to the EA for approval as part of an environmental permit variation (see section 1.4.2). Proposed noise models in addition to the above plans should be read in conjunction with this ENMP to highlight the

significant improvements which will be made as a result of the above three place planned changes shown in Section 1.3.1.

1.3.3 This Noise & Vibration Management Plan (VNMP) has been produced in assuming points i – vi have been implemented and it must be noted that point no. vii would be completed upon issue of planning permission and the permit variation due to the mass expenditure associated with it. The above points are discussed throughout various sections of this NVMP. The above measures have come at a significant expenditure to the operator which should be taken into consideration by the EA and surrounding receptors.

1.4 <u>Site history / background</u>

- 1.4.1 Oaktree Environmental Ltd have been instructed by Assington Autos Ltd (the operator) to prepare a NVMP for their site situated at The Breakers Yard, Barracks Road, Assington CO10 5LP. This NVMP has been produced to address EA CAR Form Report ID: 401051/0441202 where it was considered noise from the site is causing a significant environmental effect to the nearest sensitive receptors (NSR) following a Noise Impact Assessment (NIA) undertaken by the EA which was issued October 2022. The EA have stated in their report "In 2017 3 reports of noise were received by the Environment Agency. However, this increased greatly in 2018 to 253 reports, when the operator of the site changed and activity intensified. In 2019 we received 191 reports of relating to noise but by 2021 this had decreased to 38".
- 1.4.2 It is worth noting an additional NVMP and NIA has been prepared by Oaktree and submitted to the EA accompanying a permit variation to increase the throughput of the site from 2,500 tonnes per annum (tpa) to 25,000 tpa and increase the permit boundary of the site, this is also subject to a planning application undergoing determination. The permit variation was submitted to the EA on 08/04/2022. Various requests were made to the EA to fast track this permit application but they do not consider it worthy of this process despite the EA demonstrating the operator is causing a 'significant environment effect' as detailed below. The submitted NIA accompanying

the permit variation details noise levels would reduce from the currently measured +28dB above background to <5dB above background and not cause adverse impact.

1.4.3 The purpose of this NVMP is to detail the existing site operations which create noise and vibration and detail the suitable mitigation measures outlined in this NVMP put in place by the management of Assington Autos Ltd to ensure noise and vibration is controlled using Best practicable means (BPM) to ensure the receptors listed in Section 2.2 below are not affected by the above proposals, thus reducing the number and likelihood of complaints arising.

1.5 <u>Site location</u>

- 1.5.1 The site is located on the southern side of Barracks Road to the south of Assington village. It has long been established as a vehicle breakers yard and scrap recycling centre. Assington Autos Ltd took over the site in 2017 and set about changing the manner in which the site operated to improve working practices, making the process more efficient and ensuring that the best environmental practices are upheld. They are recognised as being one of the leading companies in the vehicle recycling Authorised Treatment Facility field.
- 1.5.2 The NSR are located approximately 35m and 113m west, and 113m east of the site as shown in the illustration overleaf. The plan also shows the current dismantling area which is considered the noisiest aspect of the operation.



1.6 Facility overview

1.6.1 The site currently operates EPR/EB3800UW which is a SR2011No3 Environmental Permit (EP) was originally issued on 23/12/2013 and transferred to the current operator (Assington Autos Ltd) on 22/01/2017.

1.7 <u>Hours of operation</u>

- 1.7.1 The site operates to the current working hours:
 - 06:00am 06:30am (Monday Friday) = HGVs comprising 2 no. 8 car transporters and 1 no. 4 transporter leave the site to begin their collection of ELVs. The transporters return to the site no later than 18:00pm. The number of movements depend on the travel time of the HGV.
 - 07:30am (Monday Saturday) = Staff arrive at the site in cars.
 - 08:00am 17:30pm (Monday Friday) = All operations permitted comprising depollution of waste motor vehicles and sorting, separation, compacting, or, of waste into different components for recovery.
 - 08:00am 17:00pm (Monday Friday) = Arrival and removal of HGVs unloading and loading waste to and from the site.
 - 09:00am 17:30pm (Monday Friday) = Baling, shearing and cutting (using handheld equipment) of waste for recovery.
 - 17:30pm 18:00pm (Monday Friday) = Housekeeping and tidying of site for the
 next day using mobile plant to ensure all waste is securely stored in bays
 - 08:00am 13:00pm (Saturday) = No waste acceptance or treatment, the site undergoes a full housekeeping, tidy up ready for operations to commence on Monday.
 - 09:00am 13:00pm (Saturday) = loading of waste into HGVs (from external companies) for removal off site.
 - The site will not operate in any circumstances on a Sunday or Bank Holiday.

Sensitive Receptors

2.1 Receptor Plan

2.1.1 A sensitive receptors plan (SRP) has been produced to accompany this NVMP and is shown in Appendix I referenced as on Drawing No. BAR/3041/04. The receptors highlighted are those which are at risk by noise generated from the site.

2.2 <u>List of receptors</u>

2.2.1 The receptors illustrated in the Receptor Plan are detailed in the table below with approximate distances to them. Receptors which are over 500m have not been included within the table below as it is considered that they will not be affected by any noise pollution arising from the site.

Table 2.1 – Distances to Selected, Representative Sensitive Locations

Boundary	Receptor	Approximate distance from site boundary (m)
Various	Residential properties off Barracks Road to the north, northwest and west	35 – 500
East	Residential property off High Road	270
Southeast	Further residential properties off High Road	400
Northwest	Residential properties off The Street	420 - 500
Northwest	Residential properties off Orchard Road	315 - 500

2.3 Other noise sources

2.3.1 Other industrial / commercial land uses which will contribute to the background noise level are tabulated below in Table 1.4 below.

Table 2.2 – Other Noise Emitting Operators

Company	Address	Type of Business	Approximate distance from site boundary (m)
N/A	Various	Agricultural comprising the use of tractors and heavy machinery throughout the day	Adjacent
Property to the north of the site	Land to the north of Barracks Road, Assington	Various – see 2.3.2	20 - 250

- 2.3.2 The predominant use of the property to the north of the site comprises agriculture however the owner also contributes to the background noise of the area due to the following activities:
 - Use of articulated HGVs egressing the site from 04:00am onwards
 - Repairing of agricultural machinery using handheld equipment
 - Using mobile plant for manoeuvring machinery around the property
 - Baling of straw and hay in external areas of the site
 - Loading of heavy equipment around the site and into metal containers
 - Use of tractors on surrounding road networks and adjacent fields
 - Shredding of wood and plant matter arising from the property
- 2.3.3 The adjacent property owner is not restricted to any operational hours at the site so the above operations can take place throughout any time of the day.
- 2.3.4 Other sources of noise comprise birdsong and noise generated by other vehicle movements on Barracks Road.

3 Site Operations

3.1 Waste deliveries

- 3.1.1 Waste is delivered and removed from the site via the existing access to the north of the site which is a hardstanding / tarmacadam road. Upon arrival, an operative will direct the driver to the relevant area on site which is usually the weighbridge where the contents of the vehicle and waste transfer/consignment note are inspected.
- 3.1.2 Deliveries/removals from the site primarily consisting of Ltd.'s own vehicles/contracts but there will be third parties who send articulated vehicles for removal of waste vehicle parts and tankers for emptying interceptors. These vehicle types are shown below:
 - HGV skip vehicles
 - fixed body bulk loaders with a number of smaller deliveries of scrap from,
 - 8-wheeled tipper vehicles which can carry loads of up to 18-20 tonnes
 - Articulated Lorries.
 - Recovery vehicles / car transporter (ELVs only)

3.2 Waste acceptance

- 3.2.1 Waste delivered to the site via an existing access to the north and upon arrival all waste will undergo a visual inspection on arrival at site prior to progressing through to the weighbridge. Once the vehicle has passed the initial inspection, the vehicle will be directed to the weighbridge where the waste consignment notes (including hazardous) and transfer documentation will be fully checked to ensure the waste matches the preacceptance information received.
- 3.2.2 Any wastes identified during the incoming waste inspections which do not conform to site acceptance criteria will not be accepted and/or removed and quarantined immediately to await safe removal from site and the EA will be contacted (where necessary) if the non-conforming waste discovered is likely to lead to a breach of permit conditions or a potential risk of combustion. The majority of all waste delivered

to the site will comprise Assington Autos Ltd's own vehicles with some occasional third party deliveries of ELVs and parts.

3.3 Site infrastructure

3.3.1 The current site infrastructure is clearly detailed on Drawing Nos. BAR/3041/03 and which is shown in Appendix I of this NVMP. The drawing illustrates the location of plant, machinery and stored wastes across the site.

3.4 <u>Site Processes</u>

3.4.1 The following sections detail the main operations which take place at the site.

STAGE ONE - REMOVAL OF HAZARDOUS COMPONENTS

- 3.4.2 Once vehicles have passed inspection, they will be stored adjacent to the first depollution building where the battery will be disconnected or removed from the ELV. The ELV will then be depolluted which will consist of removing the wheels, battery, catalytic converter, air bag, ECU, jack and key. These parts will be stored temporarily in separate boxes within the building before being transferred to the larger associated storage areas on site. Tools used for this process are as follows:
 - An impact nut gun is used to remove the wheels this is a very quick and efficient process. This causes minimal noise.
 - An abrasive wheel is used to remove the catalytic converter which is a very quick and efficient safe method to carry this out.
 - Batteries, ECUs, airbags are removed using rachets/spanners this does not produce any noise.
 - Key and jack are removed by hand which also does not produce any noise.
- 3.4.3 Once this process is complete, the ELV will be transferred to the adjacent building to the south and undergo the stage two process comprising depollution as shown overleaf.

STAGE TWO – DEPOLLUTION AND REMOVAL OF HAZARDOUS FUELS & LIQUIDS

3.4.4 Vehicles are depolluted using a green car depollution rig which is powered by electric and compressed air. The compressed air is run by a generator on 3 phase electrics. The liquid components then drain via a series of pipes to the sealed bunded tanks which are outside of the building. When the liquids in the bunded tanks are reaching full capacity, the liquid is removed in a safe manner using a specialist tanker vehicle. This process does not produce any noise pollution. The vehicles are the transported out of the shed using a forklift to the stage three process as shown below.

STAGE THREE – VEHICLE STRIPPING

- 3.4.5 The vehicle is now ready to be stripped of the engine, gearbox and axles. These are removed/cut using battery powered saws and impact nut gun. These tools are used as they are a quick, efficient tools and produce quieter noise levels than petrol cutting equipment/hot works. The engine, gearbox and axle are now ready to be passed to stage four and the shell is ready to be passed to stage five. This is passed to stage five using a forklift as it is lifted and not being scrapped along the floor, this reduces noise levels.
- 3.4.6 Stages one three will take place inside buildings which have open fronted facing east i.e. away from the nearest residential receptors. The remaining stages will take place in external areas of the site.

STAGE FOUR - VEHICLE STRIPPING / ENGINE REMOVAL

3.4.7 Once the engine, gearbox and axle are removed, these are then cleaned, removing any wiring loom, loose metals. The wiring loom is removed using an angle grinder this has proved most effective and very quick process. Export engines will then be placed to the south of the site using a forklift to transport to the allocated area.

STAGE FIVE - VEHICLE STRIPPING / REMOVAL OF WIRING LOOM AND VARIOUS GRADES OF MATERIALS FROM THE VEHICLE SHELL

3.4.8 The above items are removed using a 23.5tonne Hyundai rubber track machine with powerhand attachment. This is powered by diesel and AdBlue again to reduce noise levels from this machine. Vehicles are placed in front of the machine on a 30mm plate to avoid damage to the concrete area. The clamp system on the machine holds the shell in place and the pincher starts to remove all non-ferrous metals, these metals are then placed in adjacent bays. Once all the non-ferrous metals are removed, the shell is then placed between the Hyundai and Atlas grab for the Atlas driver to commence his role in the process.

STAGE SIX – USE OF ATLAS GRAB/EXCAVATOR AND SHEARING/BALING OF ELVS

3.4.9 This machines roll is to lift the depolluted ELV shell and place into the baler/shear. The shear can process one car shell every 2 minutes. Once the ELV is baled, it is lifted and placed safely on the pad and stored ready to be collected by the third-party hauliers. The Atlas is run on AdBlue to reduce noise and emissions, this machine is also on rubber wheels to reduce noise and impact vibrations.

<u>STAGE SEVEN – PROPOSED ACCEPTANCE OF VEHICLE PARTS IN SKIPS</u>

- 3.4.10 The site will propose to accept skips of damaged vehicle parts form garages/business which will be accepted and tipped into the one the adjacent bays near the baler/shear.

 These are likely to be placed near the shell and baled at the same time as per stage six.
- 3.4.11 The operator will also store depolluted ELVs on the racking, these are vehicles which are in good condition and will be advertised online where customers can purchase parts from the ELV. This ELV is usually stored here for approximately 3-6 months then it will be subject to baling.

3.5 Mobile plant and equipment

- 3.5.1 All mobile plant on site is subject to annual manufacturer maintenance to ensure proper working order in the form of service contracts.
- 3.5.2 Site management will undertake or delegate additional preventative maintenance checks on a more frequent basis i.e. daily, before, during and 1 hour at the end of each working day using a checklist similar to that in Appendix II to ensure the following:
 - Mobile plant is mechanically sound for use and no presence of black fumes or trailing liquids visible prior to use or following shutoff of plant/equipment.
 - Mobile plant is stored in the out-of-hours plant storage area as shown on Drawing
 No. BAR/3041/03 and following cessation of activities, external separation
 distances of 6m are observed between plant and any combustible or flammable
 material.
 - In the building, all plant will be powered down and completely shut off prior to cessation of operations on any given day.
 - Plant which is not in use for any extended period is stored at least 6 metres from combustible or flammable material.
 - All mobile plant will contain firefighting equipment inside.
 - Dust from processing/treatment operations on site can settle throughout the
 working day onto processing plant, plant exhausts and engine parts so a fire-watch
 will be implemented after cessation of works and equipment powered down for 1
 hour each day to remove any dust/fluff using brushes, hoses etc... Any build of
 dust/fluff will be removed from the equipment and deposited into an adjacent
 refuse bin which will be emptied when full.
- 3.5.3 In addition to the above, fleet lorries are brake checked every 6 weeks along with routine serving as per compliance with the Traffic Commissioner.

4 Noise Management and Controls

4.1 <u>Noise Sensitive Receptors</u>

- 4.1.1 The site lies within a mixture of a housing and agricultural setting with the nearest noise sensitive residential receptors located 35m and 113m west, and 113m east of the site.
- 4.1.2 It must be noted that the current site was in use prior to Assington Autos Ltd taking full control of the site in 2017. The use of the site has always been a 'scrap yard' which dates back to the early 1900's. Available Google Earth demonstrates the use of the site from 2021 2000 and then a capture from 1945 shows some faint industrial activity.



2021 2020



2017 2015



2013 2008



2007 2005



2003 2000



1945

4.1.3 In terms of potential noise impact, whilst the development proposed will be operated using the Best Practicable Means at all times, this site-specific NVMP has been prepared in order to ensure the noise levels at the site can be managed appropriately and reduce any impact on the surrounding receptors.

4.2 <u>Noise Sources</u>

4.2.1 The main sources of noise which currently arise from site operations are detailed in the table below.

Table 4.1 - Noise Sources

Reference to NMP table	Noise Source
А	Skip lorries/HGVs travelling to and from the site for delivery / collection of vehicle parts and waste material including car transporter delivering and unloading an ELV using a forklift
В	Initial depollution and dismantling of an ELV comprising use of the compressor, impact nut gun, battery powered saws for removal of hazardous components, cutting of engines and salvaging parts
С	Stripping/dismantling of the ELV using angle grinder, removal of non-ferrous metal using Hyundai with powerhand attachment to 'pinch' the waste.
D	Loading of ELV into baler/shear using Atlas grab/excavator
E	Use of baler/shear
F	Tipping and removal of alloy wheels to the storage bays at the site including their loading and unloading
G	Loading of waste parts into containers for storage on site and into articulated vehicles for removal off site
Н	Manoeuvring of mobile plant around external areas of the site
I	Small vehicles travelling to and from the site (e.g. staff and visitor's cars, courier van deliveries etc.)
J	Repairs
К	Site operations taking place outside of normal operating hours when background noise levels are likely to be lower comprising HGVs egressing the site between 06:00 – 06:30
L	Housekeeping on a Saturday using mobile plant to tidy the site

4.3 Noise Management Table

- 4.3.1 A site-specific NVMP table overleaf details the above noise sources and how the current and proposed infrastructure will reduce the impact of noise to the NSR.
- 4.3.2 In addition to the existing controls in this NVMP, the complaints procedure further discussed in section 5 will be used in the event that any noise complaints are received. If a noise complaint is received and the applicant has been made aware, immediate action will take place reviewing and identifying whether any changes to existing procedures are required or if new procedures need to be put in place. Any changes which may be required will be implemented immediately.

Source(s)	Receptor(s)	Consequence	Magnitude of noise source	Characteristic of noise source	Probability of noise disturbance	Remedial Action / Recommendations / Comments	Assessment Outcome following actions / recommendations
A = Skip lorries/HGVs travelling to and from the site for delivery / collection of vehicle parts and waste material including car transporter delivering and unloading an ELV using a forklift	See Section 2.2	Noise pollution	Medium	(Low Pitch)	Medium	Engines will be switched off when the vehicles are not being used. Waste deliveries and collections will only be permitted during the hours of 08:00 – 17:30 Monday – Friday and no operations on Saturdays, Sundays or Bank/Public Holidays. These hours are considered 'normal' working operational hours. The existing access road to the site will be maintained in good state of repair to prevent unnecessary noise being generated. All skip lorries operated by Assington Autos Ltd be fitted with chain socks in order to reduce the noise produced by the loose chains banging on the side of the skip. Implementation of a 5mph speed limit onsite. Drivers must lower the tipper body before driving away from the tipping area. All drivers are required to enter and exit the site with due consideration for neighbours. Drop heights will be a maximum 1m from the ground to allow for clearance of the relevant vehicle. Management will ensure that all vehicles involved in the tipping of waste operated by Assington Autos Ltd are functioning suitable i.e. vehicles must be well maintained and operated with silencers and moving parts to be regularly lubricated. The proposed use of the HGV servicing building will ensure this policy is followed strictly. All mobile plant and other vehicles used will benefit from white noise reverse alarms. A no idling policy will be in place and staff/third party drivers will be told not to revengines. The proposed one-way system at the site will avoid unnecessary movements leading to vehicles unnecessarily waiting on site.	Low due to background noise levels being high

Source(s)	Receptor(s)	Consequence	Magnitude of noise source	Characteristic of noise source	Probability of noise disturbance	Remedial Action / Recommendations / Comments	Assessment Outcome following actions / recommendations
B = Initial depollution and dismantling of an ELV comprising use of the compressor, impact nut gun, battery powered saws for removal of hazardous components, cutting of engines and salvaging parts	See Section 2.2	Noise pollution	Medium	Continuous (Low Pitch)	High	Refer to the above actions shown in A and additional actions/proposals are shown below. The depollution activity takes place inside a building sited approximately 100m further the nearest residential receptors, the building is open fronted with the open front facing east i.e. in the opposite direction of the receptors. The compressor used for depolluting vehicles has been replaced with a new BOGE compressor on 04/08/2022. All petrol cutting equipment has ceased on the site and the site now uses a 5 no. Husqvarna K1 PACE Battery Powered Disc Cutters which produce a much lower background sound than the former petrol cutters. All equipment used for this process will be checked daily and cleaned regularly to ensure it is fit for purpose. Assington Autos Ltd trialled a Sthil electric abrasive wheel but was deemed unsuitable for the job and created a risk to staff.	Low
C = Stripping /dismantling of the ELV using angle grinder, removal of non-ferrous metal using Hyundai with powerhand attachment to 'pinch' the waste.	See Section 2.2	Noise pollution	Medium	Continuous (Low Pitch)	High	Refer to the above actions and additional actions/proposals are shown below.	Low

Source(s)	Receptor(s)	Consequence	Magnitude of noise source	Characteristic of noise source	Probability of noise disturbance	Remedial Action / Recommendations / Comments	Assessment Outcome following actions / recommendations
D = Loading of ELV into baler/shear using Atlas grab/excavator E = Use of baler/shear	As detailed on Sensitive Receptors Plan	Noise pollution	Medium	Continuous (Low Pitch)	High	Refer to the above actions shown in A and additional actions/proposals are shown below. The loading of waste into baler/shear is done using a 360° grab/crane as opposed to a loading shovel meaning the material can be inserted into the plant with minimal drop height to prevent any crashing, banging or vibration. It is proposed to operate this machinery between the hours of 09:00 – 17:30 which are not considered unsociable hours. Management will ensure that all loading plant operated by Assington Autos Ltd is functioning suitably i.e. moving parts to be regularly lubricated. Operatives will be informed to turn off engines of the mobile plant when it is not in use and no revving of engines will be permitted at the site. Any malfunctions in plant i.e. missing screws/bolts which result in excessive noise will be de-commissioned until an alternative loading plant sourced. The operator will explore fitting a new engine on the baler but only upon issue of planning permission and the variation of the permit due to the significant expenditure and downtime in doing so.	Low
F = Tipping and removal of alloy wheels to the storage bays at the site including their loading and unloading	As detailed on Sensitive Receptors Plan	Noise pollution	Medium	Infrequent (High Pitch)	High	Refer to the above actions shown in A and additional actions/proposals are shown below. Staff will be trained to ensure they minimise the amount of drops if this waste due to high pitch it creates. The alloys will not be dropped from height and carefully placed within the removal vehicle to prevent a crashing 'tinny' noise.	Low

Source(s)	Receptor(s)	Consequence	Magnitude of noise source	Characteristic of noise source	Probability of noise disturbance	Remedial Action / Recommendations / Comments	Assessment Outcome following actions / recommendations
G = Loading of waste parts into containers for storage on site and into articulated vehicles for removal off site	As detailed on Sensitive Receptors Plan	Noise pollution	Medium	Infrequent (High Pitch)	High	Refer to the above actions shown in A and additional actions/proposals are shown below. The operator has recently altered the way the material is loaded into containers by ensuring plant grabs can go inside the containers and site management have instructed the grab operators to load the containers by placing the material in them rather than dropping it. Site management also closely monitoring the staff loading the material continuously (in addition to the daily monitoring) to make sure that the revised loading operations are carried out. Management will ensure that all loading plant operated by Assington Autos Ltd is functioning suitably i.e. moving parts to be regularly lubricated. Operatives will be informed to turn off engines when the plant is not in use and no revving of engines will be permitted at the site. Any malfunctions in loading plant i.e. missing screws/bolts which result in excessive noise will be de-commissioned until an alternative loading plant sourced. The main loading areas are located within the southern most part of the site which is the furthest possible distance possible from the nearest residential receptors. All mobile plant is now restricted to a 5mph speed limit to reduce the impact of loud engines revving during manoeuvring off site.	Low
H = Manoeuvring of mobile plant around external areas of the site	As detailed on Sensitive Receptors Plan	Noise pollution	Low	Intermittent (Low Pitch)	Med	Refer to the above actions shown in A and additional actions/proposals are shown below. Management will ensure that all site vehicles operated by Assington Autos Ltd are functioning suitable i.e. vehicles must be well maintained and operated with silencers and moving parts to be regularly lubricated. All manoeuvring areas using mobile plant are surfaced with impermeable concrete which is generally flat and well maintained to prevent unnecessary banging of vehicles on uneven ground leading to excessive vibration. Forklift trucks have been fitted with engine silencers and restrictions to limit their speed to 5mph.	Low

Source(s)	Receptor(s)	Consequence	Magnitude of noise source	Characteristic of noise source	Probability of noise disturbance	Remedial Action / Recommendations / Comments	Assessment Outcome following actions / recommendations
I = Small vehicles travelling to and from the site (e.g. staff and visitor's cars, courier van deliveries etc.)	As detailed on Sensitive Receptors Plan	Noise pollution	Low – Very Low	Intermittent (Low Pitch)	Low	All those working on and visiting the site to be made aware of need for considerate driving and keeping vehicles well maintained. Small vehicles are not considered to be an issue in relation to excessive noise which could cause a complaint. Implementation of a 5mph speed limit onsite. All drivers are required to enter and exit the site with due consideration for neighbours.	Very Low / Negligible
J = Repairs	As detailed on Sensitive Receptors Plan	Noise pollution	Very Low	Occur at a specific time (Low Pitch)	Low	If repairs to the site are required, the work is to be undertaken with due regard for the possible noise nuisance and during working day hours. In the event of major repair work being undertaken which is likely to cause significant noise and disruption, neighbouring residents and the Environment Agency will be notified in advance and would not commence without agreement unless in extenuating circumstances i.e. to minimise a fire occurring.	Very Low / Negligible
K = Site operations taking place outside of normal operating hours when background noise levels are likely to be lower comprising HGVs egressing the site between 06:00 – 06:30	As detailed on Sensitive Receptors Plan	Noise pollution	High	Intermittent (Low Pitch)	Med / High	Vehicles are required to leave this time ensuring they can finish and return to their shift before the site closes. There would be a maximum of 3 transporters leaving the site during these hours and would turned on and driven off site in 3 consecutive movements preventing unnecessary engine noises. Engines will be switched off when the vehicles are not being used. Engines will not be revved in any circumstances. The existing access road to the site will be maintained in good state of repair to prevent unnecessary noise being generated. Implementation of a 5mph speed limit onsite. All drivers departing during this time will be suitably trained to enter and exit the site with due consideration for neighbours i.e. radios switched off and no shouting.	Low

Source(s)	Receptor(s)	Consequence	Magnitude of noise source	Characteristic of noise source	Probability of noise disturbance	Remedial Action / Recommendations / Comments	Assessment Outcome following actions / recommendations
L = Housekeeping on a Saturday using mobile plant to tidy the site	As detailed on Sensitive Receptors Plan	Noise pollution	High	Intermittent (Low Pitch)	Med / High	Refer to the above actions shown in A for manoeuvring of vehicles around the site and additional actions/proposals are shown below. Housekeeping will take place during on a Saturday between the hours of 08:00 – 13:00 which are not considered unsociable hours. No running of mechanical treatment plant will take place. The main housekeeping measures involve greasing machines, carrying out repairs and the sweeping/tidying the site. The site will only use mobile plant in extenuating circumstances i.e. to reduce a fire risk, in a fire event, due to a backlog of waste caused due to staff illness, closure of destination site or transport letdown. The EA and receptors would be informed in advance if any excessive noisy operations would take place on a Saturday. Operatives will be informed to turn off engines when the mobile plant is not in use and no revving of engines will be permitted at the site. Any malfunctions in loading plant i.e. missing screws/bolts which result in excessive noise will be de-commissioned until an alternative loading plant sourced. No mechanical processing of waste will take place during these hours. Continuous on-site monitoring by gate operator, operatives and operations manager to detect any unusual excessive noise which could cause complaints off site.	Low

4.4 Monitoring

- 4.4.1 It is proposed that any offsite monitoring would primarily comprise the subjective onsite observations by site management. Given that the noise assessment has determined that proposed noise levels associated with the proposed operations are unlikely to significantly exceed the background level it is difficult to justify the requirement to undertake routine pro-active offsite monitoring.
- 4.4.2 There is a property to the north of the site which carries out noisier activities but as the activities vary on a day-by-day basis, it would make it difficult to assess any measurements made at the NSR during the site's operation i.e. what amount of the noise level may be apportioned to the site. To have any certainty in evaluating the true noise level as a result of the operations at the receptor measurements would have to be made during time of inactivity at neighbouring sites. This would introduce a great level of difficulty and eradicates the opportunity to arrange for a routine, weekly time for noise monitoring.
- 4.4.3 It would seem reasonable to propose that noise levels are subjectively monitored by site management. Site management will be able to monitor noise levels throughout the day whilst onsite and would notice a rise in noise levels because of plant failure, staff negligence, incompatible loads or other extenuating circumstances. If site management identify these issues, the operator they can then take steps to remedy the situation (i.e. cease the activity if needed). Should a noise a complaint be received, site management would review the nature of the complaint, and should it be deemed necessary (i.e. numerous complaints relating to a particular item of plant) then an investigation may be commenced and advice sought from a professional acoustician.

4.5 Recording

- 4.5.1 Site management will record complaints in the site diary or complaints report from in Appendix II and contract the EA within 24 hours if a complaint is received.
- 4.5.2 Site management will be required to make a note of any unavoidable events such as plant failure, in the site diary, rather than just actual complaints received and notify

the EA within 24 hours. This will ensure that if complaints are received retrospectively from either the EA or directly, any circumstances which led to that complaint as a result of elements outside of the operator's control would be able to be attributed (or, at least, in part) to the cause of the complaint. Where all appropriate measures fail to prevent an activity causing unacceptable levels of noise pollution, the activity will be stopped.

4.6 <u>Emergencies</u>

4.6.1 In the event of any unforeseen circumstances i.e. faulty equipment, the site manager will make an assessment of whether to cease activities/all operations with the main emphasis on site will be to reduce any noise impacts.

5 Actions when complaints are received

5.1 <u>Complaints procedure</u>

- 5.1.1 If any noise complaints are received, site management will complete a 'complaints and events log' and detailed individually on the complaints form (in Appendix II), both of which will be kept for inspection on request by the LA, EA or third parties. Details of information to be completed are dates, nature of complaint, weather conditions at the time of the complaint, investigation details, action taken and a signature (as a minimum).
- Noise complaints will be prioritised and investigated without delay or by end of working day only in extenuating circumstances. This will also apply to complaints received both directly and via other sources (e.g. EA or local authority). Where investigation substantiates the complaint, fully or partially, then remedial action will be taken immediately and if measures taken fail to stop the pollution then the activity must be stopped and not restarted unless and until additional measures have been implemented to prevent the emission causing pollution. The EA will be contacted in the event the complaint cannot be escalated. Following a complaint and if it is deemed correct following investigation, the appropriate action will be taken to prevent the issue from reoccurring i.e. evaluation of current abatement measures, site operations, additional abatement measures and re-training of staff via toolbox talks.
- 5.1.3 The operator will make a note of any unavoidable events plant/equipment malfunctions in the site diary, rather than just actual complaints received. This will ensure that if complaints are received retrospectively from either the Council/EA or third parties, any circumstances which led to that complaint as a result of elements outside of the operator's control would be able to be attributed to the cause of the complaint.
- 5.1.4 It must be noted that the site lies adjacent to a noisy property to the north, so in the event of a complaint, the operator will substantiate the complaint by carrying out noise monitoring to identify whether the complaint is valid. If the complaint is valid, the site

will implement the complaint procedures check and if required, amend site operations and provide additional attenuation around the site. This would involve using a level 2 sound meter and comparing this information from the background levels recorded from the recent Noise Impact Assessment.

- 5.1.5 If the source cannot be ascertained with 100% confidence, site management will either suspend or reduce the likely noise generating activities, i.e. cutting, shearing/baling.
- 5.1.6 If the source is within the site's control, site management will take appropriate action to ensure the issue has been rectified. This may take the form of the following:
 - a) Investigating the source to prevent a re-occurrence.
 - b) Suspending operations which are giving rise to excessive noise due to potential plant malfunction
 - c) Investigate noise mitigation measures
 - d) Logging findings of a c in the site diary / complaints form and also in the reporting template within the EP.
 - e) Report actions to the complainant and/or EA within 24 hours.
 - f) If following the above complaints are still received, the site will cease operations until the issues have been rectified.
- 5.1.7 The EA will be notified by email of any third-party noise complaints received within 24 hours including the complainant and the outcome of the investigation. Where complaints are substantiated as causing or likely to cause significant noise pollution, then the EA will be notified.

5.2 <u>Complaints recording</u>

5.2.1 Any complaints received in relation to noise and vibration will be recorded on the form shown in Appendix II. This form will normally be completed, signed and dated by site management, if they are not available, another suitably trained staff member.

- 5.2.2 The following details as a minimum will be completed on the form:
 - a) The name, address and telephone number of the caller will be requested.
 - b) Each complaint will be given a reference number.
 - c) The caller will be asked to give details of:
 - the nature of the complaint;
 - the time;
 - how long it lasted;
 - how often it occurs;
 - is this the first time the problem has been noticed; and,
 - what prompted them to complain.
 - d) The person completing the form will then, if possible, make a note of:
 - the weather conditions at the time of the problem (rain snow fog etc.)
 - strength and direction of the wind; and,
 - the activity on the installation at the time the noise, dust or odour was detected,
 particularly anything unusual.
 - e) The reason for the complaint will be investigated and a note of the findings added to the report.
 - f) The caller will then be contacted with an explanation of the source of the complaint if identified and the action taken to prevent a recurrence of the problem in future.
 - g) If the caller is unhappy about the outcome or unwilling to identify themselves the caller will be referred to the appropriate department of the EA or Local Council.
 - h) Following any complaint, the complaints procedure will be reviewed to see if any changes are required or if new procedures need to be put in place.

6 Training

6.1 <u>Training regime</u>

- 6.1.1 All employees and sub-contractors of Assington Autos Ltd involved with potentially noisy operations will receive training in noise and vibration monitoring and complaint reporting.
- 6.1.2 Training will be given to all relevant persons to make sure they are competent in completing noise and vibration survey forms, noise and vibration complaint report forms and the site diary to ensure sufficient monitoring of noise and vibration can be carried out and any problems addressed correctly.
- 6.1.3 When selecting new plant and equipment, consideration shall be given to the need to meet all legislation and statutory guidance on noise levels and to minimise levels of noise from selected equipment.

6.2 <u>Vehicle / plant preventative maintenance training</u>

- 6.2.1 This training is provided specifically for the vehicle and plant operators in order to ensure that all plant and machinery is checked regularly to prevent any occurrences which may lead to any adverse impacts on the environment or human health.
- 6.2.2 Training will be based on the preventative maintenance schedule supplied by the plant/equipment manufacturer.
- 6.2.3 The same training will be provided to senior management enabling a dual-level maintenance programme.

6.3 <u>Liaison with Neighbours</u>

6.3.1 In the extreme event of a significant, but temporary, increase in noise and vibration from the site, neighbours will be contacted to advise them of the occurrence and action being taken to remediate the issue on site.

6.3.2 An open-door policy will be encouraged by the operator to enable any complaints from neighbouring premises (if received) to be dealt with immediately. The complainant will then be supplied with remedial actions taken and any procedures or measures put in place by the operator to reduce or ideally eradicate the likelihood of a subsequent complaint.

7 <u>Conclusion</u>

7.1 **Summary**

7.1.1 The operator has ceased the use of petrol-powered disc cutting equipment as recommended in the EA's NIA report issued October 2022 and this equipment has been replaced by 5 no. battery powered cutting equipment which has resulted in more lower noise levels arising from the site.

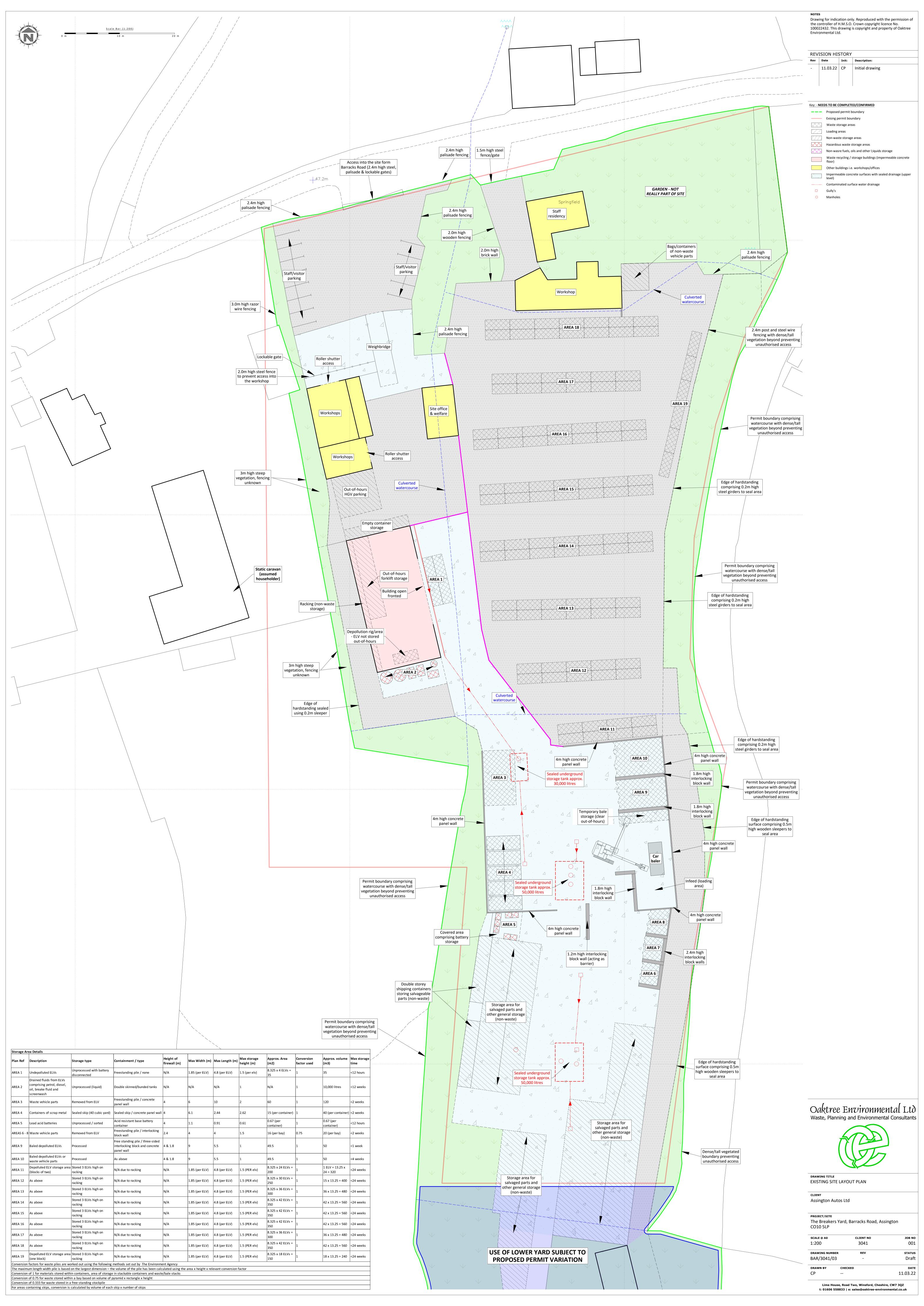
Reference should be made to section 1.1.2 in terms of current improvements made since September 2020 and proposed/planned improvements. The modelling files should be viewable by AQMAU who can confirm the level of improvement as a result of the limited mitigation/good practice measures prior to the issue of the permit variation. Essentially the current betterments lower the rating level at the nearest residential dwellings by a matter of 1-2 decibels dependent on the location.

7.1.2 The only available improvements open to the site prior to the complete revision to site layout and introduction of additional buildings and screens essentially comprise good practice measures. For example, the replacement of the steel tracked excavators with rubber attachments has reduced noise slightly, but does not reduce noise as a result of the engine or falling material (2 significant contributors to noise associated with this source), the proposals associated with the variation would increase the distance from this source to the receiver as well as introducing additional screening, which is a much more effective method of mitigation. Likewise, whilst replacing the forklift and cutting plant does reduce levels, in order to achieve a substantial betterment (which in this case is required due to the excess of the rating level over the background), much more radical changes are required. As can be seen from the modelling, the cutting is to be enclosed within a building, at a much greater distance from the receptor than the current scenario, whereby cutting is undertaken in the open yard. At present, operational limitations prevent this change from taking place.

- 7.1.3 There are also limited opportunities for the installation of additional screens until the variation can take place and the yard is extended. Noise screens operate most affectively when closest to either the source or receiver, in the current scenario this is not necessarily the case.
- 7.1.4 The operator submitted a variation of the permit in April 2022 (12 months ago), requested the permit be expedited due to a significant improvement in noise reduction arising from the site which the EA have refused to fast track. In normal circumstances, we would have expected a positive determination within this period, the operator could have relocated the operations and complaints would not be arising.
- 7.1.5 Consideration must be given to the fact that an existing portion of the site has been used as a scrap yard in some form for over 100 years and residents must have been aware of this site before purchasing their property.
- 7.1.6 The operator employs up to 25 full time staff and it is critical to the village of Assington that the site continues to operate during the proposed variation application of this permit. If the operator is forced to restrict activities to only depollution of ELVs and removal of salvageable parts for re-sale, the site would be forced to close. It is essential the permit variation and accompany NIA/NMP are looked at as a priority to prevent this from happening.

Appendix I

Drawings



Appendix II

Complaints Report Form

COMPLAINTS PROCEDURE

- Any complaints received in relation to noise and vibration will be recorded on the form below. This
 form will normally be completed, signed and dated by the site operator, if they are not available, the
 Office Manager will complete the form.
- 2) The name, address and telephone number of the caller will be requested.
- 3) Each complaint will be given a reference number.
- 4) The caller will be asked to give details of:
 - the nature of the complaint;
 - the time;
 - how long it lasted;
 - how often it occurs;
 - is this the first time the problem has been noticed; and,
 - what prompted them to complain.
- 5) The person completing the form will then, if possible, make a note of:
 - the weather conditions at the time of the problem (rain snow fog etc.)
 - strength and direction of the wind; and,
 - the activity on the site at the time the noise was detected, particularly anything unusual.
- 6) The reason for the complaint will be investigated and a note of the findings added to the report.
- 7) The caller will then be contacted with an explanation of the source of the complaint if identified and the action taken to prevent a recurrence of the problem in future.
- 8) If the caller is unhappy about the outcome or unwilling to identify themselves the caller will be referred to the EA.
- 9) Following any complaint the complaints procedure will be reviewed to see if any changes are required or if new procedures need to be put in place.

Complaints Report Form						
Date Recorded	Reference Number					
Name and address of caller						
Telephone number of caller						
Time and Date of call						
Nature of complaint (noise, vibration)						
(date, time, duration)						
Weather at the time of complaint (rain, snow, fog, etc.)						
Wind (strength, direction)						
Any other complaints relating to this report						
Any other relevant information						
Potential reasons for complaint						
The operations being carried out on site at the time of the complaint						
Follow Up						
Actions taken						
Date of call back to complainant						
Summary of call back conversation						
-						
Recommendations Change in procedures						
enange in procedures						
Changes to Noise & Vibration						
Management Plan						
Date changes implemented						
Form completed by						
Signed						
Date completed						