



**EUROPEAN METAL RECYCLING LIMITED  
EMR SILVERTOWN**

**Permit No: EPR/WE1242AA**

Unit 6, Factory Road  
Silvertown,  
London E16 2EJ

April 2023

**NOISE MANAGEMENT PLAN**

**V1**

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## **1. INTRODUCTION**

European Metal Recycling (EMR) Ltd is one of the world's largest scrap metal recycling companies and the largest in the UK. It handles over eight and a half million tonnes of scrap metal (ferrous and non ferrous) a year through receipt, processing and recycling and transfer of product to EMR dock sites for export.

EMR considers all incidents of noise intrusion and pollution as serious and the company will continue to endeavour to reduce the rate of noise incidents using the best available techniques (BAT) and appropriate measures available in the industry and the company is committed to prevent any potential environmental impacts to the local community that may be generated from EMR sites.

EMR have over 80 metals recycling sites in the UK and the inherent nature of the business activities means that noise is produced with the movement, processing, loading and unloading of metals and inevitable land use conflicts from the increase in residential housing being built and reduction in heavy industry over time. In many cases EMR operates long established recycling sites where the noise generated forms part of the 'sound environment' of a particular area.

### **1.1 SITE DESCRIPTION**

The EMR Silvertown site is a roughly rectangular shaped portion of land on Factory Road, situated within a large industrial area (Standard Industrial Estate). To the North of the site are located residential properties and London City Airport. To the south lies a commercial area before the north bank of the River Thames, situated downstream of the Thames barrier. To the East and West are various light industrial / commercial units and open / storage spaces.

The site covers an area of approximately 1.26 hectares and the Ordnance national survey grid reference for the centre of the site is TQ 42816 79892. A site location plan is provided (129-001315 Silvertown-plan) detailing the site boundary.

There are no SSSI or RAMSAR sites within 1km of the EMR Silvertown site but the site is located less than 200m (approx. 65m) from the River Thames at its nearest point (due south of the yard). The site is located within an industrial area but the closest residential area is to the North of the site within 1km (approx. 45m due North).

### **1.2 Historical Use, Planning and Operational Hours**

The site has historical usage for industrial/commercial activities since around 1979/1980. The site also has established use for metal recycling (historic planning classification *sui generis*) since 2011. A retrospective planning application was submitted for metal recycling by the operator (originally LCM) in 2011 which was approved by the Local Planning Authority in 2012. A variation application to extend metal recycling operational hours from 7am until 1pm on Saturday to 7am to 6pm on Saturday was approved by the Local Planning Authority in 2015.

European Metal Recycling Limited have adopted the existing hours of operation BUT only operates until 1pm on Saturday (the site is closed on Sunday) providing guaranteed respite from noise generated by metal recycling activity.

The Silvertown site operates between 7am – 5pm Weekdays and 7am -12pm on a Saturday, although the site normally closes to customers at 16:00 and all site operations normally cease shortly after 4pm. From time to time site may receive scrap metal material from local councils or in an emergency outside hours or over a weekend including Sundays/Bank holidays but the Environment Agency will be informed in this eventuality.

**Table 1. Site Operational Hours**

Day	Opening hours
Monday to Friday	07.00 – 17.00
Saturdays	07.00 – 12.00
Sundays and Public Holidays	Closed

Maintenance and essential repair works may need to be carried out outside normal ‘opening’ or operational hours (working hours) or at weekends from time to time. EMR will try as far as reasonably practicable to conduct these activities for example loading or unloading vehicles during normal ‘working’ hours but this may be required at some weekends and evenings from time to time.

## **2.0 SILVERTOWN SITE AND NOISE SOURCES**

The tipping, sorting, processing and reloading of ferrous metals occurs to the rear of the Silvertown site. This includes the shearing of metals within a screened location towards the south western boundary. To the north of the site is the non-ferrous compound which is currently under construction. The handling of ferrous metals (sorting, tidying, unloading and reloading using a mechanical grab) generates sound typically considered to be unwanted when received at noise sensitive properties.

It is important to note there is no real way to handle loose metals without generating bursts of sound that contain a range of distinctive features including ‘clangs and bangs’ (impulse content). The generation of high sound levels within the site to some degree is therefore inescapable.

Primary noise generating activities at Silvertown include:

- Mechanical loading and tipping of vehicles (light scrap)
- Mechanical loading of vehicles (heavy scrap e.g. OA, P&G)
- Unloading and tipping of metals from vehicles.
- Sorting and separating metals using mobile plant machinery (mechanised 360 grab crane / material handlers)
- Shearing of metals (size reduction) using fixed plant (shear)
- Reloading of processed and/or graded metal onto lorries
- The movement of mobile plant machinery and articulated lorries
- Site cleaning including sweeping using the mechanised grab and road

- Sweeper vehicle (twice per week) to prevent excess dust accumulation and its escape.
- End of life vehicle depollution rig operation of rig, de-polluting vehicles, removing tyres, air-bags, power-washing of floors.
- Moving and handling of ELVs by fork-lift trucks.
- Metal cutting and welding (oxy – propane cutting / arc welding) – maintenance only (no production ‘burning’ takes place on site).
- Decanting and extraction of fuel, oil, brake fluid etc. and direct pumping of fluids into tank farm, adjacent to depollution rigs.

Metal size reduction (e.g. operation of the shear machinery) is in relative terms quiet compared to the impact sounds from metals handling from loading the shear hopper. However, the hydraulic pumps and cooling fans do also generate continuous noise with low frequency content. The shear is currently powered using a diesel generator. However this is a temporary arrangement awaiting the installation of electrical power towards the rear of the site, when the shear will ultimately be converted to a quieter, electrically powered shear.

The handling and loading of processed and unprocessed metals are often at elevated locations reducing the effectiveness of screening. In turn this typically leads to the need for higher screening to break the acoustic line of sight from source to receiver.

The identified potential *significant* sources of noise are:

- General movement of scrap metal on site, particularly heavier grades e.g. OA, P&G. when dropped from a height / double handling
- Operation and loading of shear.
- Tipping of scrap from vehicles
- Loading of scrap into vehicles/containers
- Loading of scrap metal into ships (particularly heavier grades such as OA and P&G)
- Movement of certain grades of metal – OA, larger items.
- Unloading and loading of aluminium wheels

The site is primarily used for acceptance, storage, handling, processing and transportation of processed metals globally with the new addition of an ELV depollution rig and processing area. Ferrous metal processing of metal using fixed plant takes place within the diesel powered shear located at the rear of the site.

### **2.3 ELV (End of Life Vehicle) Depollution and Processing**

The newly installed ELV depollution rig is located inside a building, with the hazardous fluids (fuels, oil, brake-fluid etc.) from depollution, directly pumped into individual tanks in a tank farm adjacent to the building. Undepolluted ELVs are stored outside the ELV building and are transferred by fork-lift truck directly, from the external storage area into the building for processing and depollution. Once the ELVs have been processed with the building they are then transferred directly to the light-iron or frag-feed pile, for onward transfer to a shredder site.

Processing and depollution of ELVs is a low noise impact activity and additionally it also takes place within a building reducing further the impact of any noise.

#### **2.4 Diesel Powered Ferrous Metal Shear**

The shear is located at the rear of the site, furthest away from any sensitive receptors. Safe Working Procedures (SWPs) have been developed for the processes involved in shear operation and shear operatives also undergo specific training (e.g. Efficient Shear Operation and Use). These procedures are followed at all times when operating the shear.

The main engine block and (engine) working parts of the shear are enclosed by acoustic panels, which mitigate any propagation of noise from the diesel engine. It is planned (as part of energy improvements and the UK wide implementation of the energy management system ISO50001) to convert the diesel powered shear to an electrical powered shear at some point in the near future (timeline to be agreed), which will generate much less noise.

Regular statutory Inspections are performed on the shear by contracted insurance engineers (Allianz) and the shear also forms part of the regular SHE (safety, health and environment) inspection regime. If there are any defects of the shear (e.g. loose fittings etc.) or it is not operational or not performing correctly and especially if the defect may potentially cause environmental harm (such as excessive noise) or pose a health and safety risk, then the shear will be shut down, operations ceased and any defects reported to the site manager immediately, so that repairs / improvements can be performed.

A regular maintenance schedule has been implemented for the shear and there are planned maintenance shut-downs, when required repairs and improvements are needed. Only authorised and trained personnel can operate the machine or perform repairs and maintenance work on the shear and safe working procedures (SWPs) are to be followed at all times.

#### **2.5 Noise Shielding and Attenuation**

In addition to the ferrous metal activities, shearing and tipping and loading of lorries, most of the non-ferrous metal activity, unloading and loading of vehicles, processing (sorting & segregation) and storage of non-ferrous metals takes place within the large, steel clad building occupying much of the north-western part of the site. In addition to this, all the ELV depollution activity, takes place within the building (both ELV rigs are located within the building), although some undepolluted ELVs are stored externally before they are moved into the building for processing by fork-lift truck.

The location of the building which acts as a barrier to noise generated in the ferrous metal processing and storage areas means that sensitive receptors (located north of the site) are largely shielded from the noise produced by the diesel powered shear and other activities situated to the south of the building. The boundary walls to the north of the site (i.e. between the site and sensitive receptors) are 8m high at the northern boundary; these barrier walls act as shielding to the noise generated by main ferrous site activities in addition to extra shielding to the shear activities.

The location of the diesel powered shear at the rear of the site also facilitates noise attenuation by distance.

**Table 2. Material (Scrap grades) Sources of Noise**

Source of noise	Frequency	RISK (L,M, H)
<b>Lighter scrap metal</b>		
Light Iron (frag feed)	Frequent	Low
Most non-ferrous items	Frequent	Low
Aluminium wheels	Infrequent	High
<b>Medium scrap metal</b>		
Shearing	Frequent	Medium
<b>Heavy scrap</b>		
OA	Infrequent	High
P&G	Infrequent	High
Re-bar	(Part of No 2 above)	Medium
Cast iron / rail	Rarely	Low
Engines	Never	Zero
<b>Other potential noise sources</b>		
Sheet and corrugated scrap	Rarely	Low
Depollution of ELV's	Frequent	Low
Shear operation	Frequent	Medium
Detonation of air bags	Infrequent	Medium

Frequent: activity usually forms part of normal operations (tipping / loading etc.)

Rarely: Not usually part of normal activities.

Identification of the primary (most significant) sources of noise, facilitates improvement and mitigation measures which can be taken. The potential primary activities responsible for noise impacts are:

- the primary material grade identified as a potential source of noise are the heavier grades of scrap metal such as OA (oversize scrap) and P&G (Plate and Girder).
- The diesel powered shear

There are a variety of grades between OA (heaviest) and turnings (lightest) and subsequently the noise levels generated. The heavier grade of scrap (OA) usually derives from demolition waste but can include old railway line and other structural steels cut into 1-2m lengths. This grade of scrap generates the highest noise levels due to its density, dimension and typically non-uniformity of load. It generally consists of many varying sizes of solid dense steel. The density, size, non-uniformity of loads and weight due to gravity increases the force of impact increasing noise levels.

Other grades of scrap, for example light iron, are lighter, have similar physical characteristics. These grades generate significantly lower levels of noise when handling, tipped and reloaded. In short, the physical properties of the metal load contribute to the relative levels of noise generated at source.



Therefore, two separate grades of metals handled in the same manner may generate significantly different levels of noise.

## 2.6 Vibration Sources

The only possible vibration source on site is the diesel powered shear located at the back of the site. Only slight vibration is detectable in the near vicinity of the shear and no vibration at all can be detected beyond 2m from the shear, during normal functioning and operation and there is no detection of any vibration emanating from the site, at the site boundaries and beyond.

There are no other sources of potential, significant vibration on site. No vibration complaints have ever been received from the local community and neighbouring businesses (including during the construction phase). The risk of vibration from the site is therefore low to zero.

## 3. NOISE RECEPTORS

Following identification of primary receptor locations based on geography (separation distance, screening and topography), complaint history and type of noise receptor, potential noise sensitive receptors were identified to target noise monitoring at those locations identified and within the vicinity of the EMR Silvertown site.

### 3.1 Potential Sensitive Receptors

The potential primary noise sensitive receptors have been identified as follows:

**Table 2. Sensitive Receptors**

**EMR Silvertown Sensitive Receptors within 1 km Table**

Human Receptors.

Receptor Type	Map Ref.	Sector 1 (NE)	Map Ref.	Sector 2 (SE)	Map Ref.	Sector 3 (SW)	Map Ref.	Sector 4 (NW)
Residential	3	Residential properties on Brixham Street, Dockland Street, Rymill Street, Rebourne Way, Antwerp Way, Pier Road, Woodman Street, Clermont Street, Storey Street, Glenister Street, Robert Street, Church Street, Station Street, Milk Street, Fishguard Way, Grimsby Grove, Barge House Road, Hartlepool Close, Woolwich Manor Way.	5	Residential Properties on Duke of Wellington Avenue, Monk Street, Market Street.	4	Residential properties on Harlinger Street, Ruston Road, Spindle Close, Antelope Road, Boneta Road, Venus Road, Leda Road, Europe Road, Lord Warwick Street, Sunsbury Street, St Mary Street, Kingsman Street.	1	Residential properties on Drew Road, Parker Street, Parker close, Saville Road, Wythes Road, Leonard Street, Holt Road, Lord Street, Muir Street, Newland Street, Tate Road, Ben Tillet Close.
							2	Residential properties on Rawsthorne Close, Kennard Street, Sheldrake Close, Winifred Street, Fernhill Street, Manwood Street, Silverland Street, Grenadier Street.
Commercial / Industrial / Recreational (Inc. schools and places of worship)	7	London Design and Engineering UTC, Docklands Library, Way Out East Gallery, Knowledge Dock Business and Innovation Centre, Pronto Eat, Costa Coffee, University of East London Dockland Campus, LEYF - Children's	11	The Metal Recycling Group, BT/Openreach, LoveWorld UK, Hanson Direct Mail, Go-Ahead London, Ady's Garage, Woolwich Foot Tunnel.	19	Gaidam Carpentry, Euro Car Parts, Mate Bike, Le Wouri, McDonald's, InstaVolt Charging Station, Harlinger Lodge Annexe, Roman Tiles, Sparks Theatrical	6	London Borough of Newham Altitude Jobcentre, Royal Albert Quay, Altitude, RAD London, Beckton Park DLR Station.

<i>Commercial / Industrial / Recreational (Inc. schools and places of worship) continued.</i>		Garden Nursery & Pre-School.				Lighting Hire, Mimi's Kitchen, EWS Ltd UK, Crius Studios, KVD Construction & Building Maintenance.		
	8	London City Airport	16	Woolwich Ambulance Station, Waterfront Leisure Centre, ESB Charging Station, Primark, CFT Cathedral, Travelodge, Callis Yard, SET Woolwich, Ferryview Health Centre, The Castle Tavern, Seventh Sun Piercings & Tattoos, Engu Spot, First Choice Café, Bagel Boss, AT-VR, Boots, BHF Shop, Wick Tower, MoreYoga, Royal Arsenal School of Music, Zipcar.	8	London City Airport	9	London City Airport Hotel, Albert Road Surgery, North Woolwich Learning Zone, Hertz London City Airport, Zipcar, Henley Arms, Doggy Holidays, King George V House.
	10	Henley Arms, The Parish of North Woolwich With Silvertown, North Woolwich Dental Clinic, Ezras Mobile Tyres, Store Road Pumping Station, Royal Standard Hotel, Day Lewis Pharmacy North Woolwich, FusionFoods, Nisa Local, Flava Del Ltd, New Covenant Church Woolwich, Woodman Community	17	St Mary Magdalene Church Woolwich, St Mary's Gardens, New Wine Church, Gateway House, Deluxe Riverview, Chelline Hair and Beauty Products, Sunbury Street Playground, Vivis 21 Kitchen, Springall building services,	22	Avis Car Hire, Pret A Manger, London City Airport DLR station, Dew Primary School. The girl of Sandwich, Pizzaza E16, Courtyard by Marriott Hotel, Londis, Team Pro Limited.	12	Tate & Lyle sugars, Menace Model Management, Go-Ahead London Silvertown Bus Garage, Links Event Solutions, Community Food Enterprises, Pastor Victoria.

The sensitive receptor map and full details of sensitive receptors are shown in Appendix 1.

The site is not close to any Site of Special Scientific Interest (SSSI), RAMSAR site, conservation area or Nature Reserve i.e. within 500m of the site. The site is situated on a busy industrial estate directly adjacent to the large Tate and Lyle refinery works.

There are other noise sensitive receptors potentially affected but at an increased separation distance and likely affected to a greater extent by other localised noise sources within Industrial area.

### 3.2 Adjustment to noise sensitivity at EMR Silvertown in locale

The locale is affected by several sources of environmental and neighbourhood sounds. This includes regular tube traffic on the Elizabeth Line as trains emerge or disappear from the surface at the closest noise sensitive receptors on Winifred Street. Regular take offs from the City of London airport. Regular traffic movements on Albert Road included buses as well as regular traffic movement on Factory Road with a higher proportion of larger vehicles. Several industrial commercial sites within close proximity, including the Tate and Lyle sugar refinery (one of the largest sugar refineries in the world), as well as other metal recycling sites, a large bus depot and numerous industrial/commercial sites to the north of the River Thames forming a unique locale i.e. concentrated dockside/port, transportation and industrial/commercial infrastructure adjacent the River Thames to south, residential uses towards the centre and London City Airport and Royal Albert Dock to the north of Silvertown indicates a less sensitive area (ref: 230206 BAC DB EMR Silv. NIA).

## 4. NOISE IMPACT ASSESSMENT / MODELLING

Broodbakker Acoustic Consultants Limited (BAC) were commissioned by European Metal Recycling Ltd (EMR) to undertake an independent survey (Noise Impact Assessment – NIA) to assess noise from metal recycling operations affecting nearby residential receptors.

As part of the submitted permit application, under the Environmental Permitting Regulations (as regulated by the EA), the site required a noise impact assessment, as it is considered that the site may have a 'potential' noise impact on one or more receptors.

There have been no noise complaints since the site opened and began operating as a metal recycling facility by EMR. In response to the EA's concerns, noise monitoring and a noise impact assessment was undertaken on Friday 06/01/2023 by BAC, with the generation of an NIA (ref: 230206 BAC DB EMR Silv. NIA).

BAC were asked by EMR to independently undertake noise monitoring within the community during the loading of the shear and during associated metal handling activities. This is recognised by the site operator as the noisiest operation. This report describes noise monitoring undertaken on 06/01/2023 including the survey methodology, community monitoring location selection, presents the noise data and level of noise impact at the closest noise sensitive dwellings.

As an established metal recycling facility within a designated industrial/commercial area adjacent docks and busy airport adjacent commercial receptors were considered to have a low sensitivity to noise. The focus of this assessment is on residential dwellings.

#### **4.1 NIA Report Summary and Conclusions**

This NIA report (ref: 230206 BAC DB EMR Silv. NIA) presents the independent findings of the consultant procured, BAC following noise monitoring conducted in January 2023. The focus of the report was on existing noise impact at closest noise sensitive properties. As the site was both fully operational and still under construction in part, it was considered appropriate to report the current level of noise impact applying BS4142:2014.

Noise monitoring was undertaken under specific conditions to provide a worst-case scenario for metal handling, shear processing and general site activity at 1 Fernhill Street and 6-8 Winifred Street nearby. This included the continuous on and off cycle of the shear and metals movement and handling in areas of reduced screening under appropriate propagation conditions.

In summary from the assessment it was concluded that existing levels of noise impact at the closest noise sensitive receptors is considered to generate low to adverse impact, which is deemed acceptable. When applying a numerical assessment using BS4142:2014 the assessment indicates unacceptable noise from the metal processing. However, the application of context both in terms of receiver conditions and low noise sensitivity of the area, including higher tolerance of metal handling, the level of noise impact was considered acceptable.

### **5. NOISE COMPLAINTS PROCEDURE**

#### **5.1 Complaints Procedure**

All noise complaints received are logged and recorded on an electronic (Assure) Event log. Items recorded on the noise complaint log will include information, which may be used as part of any investigation, to provide any feedback, assist any monitoring and also to provide data to show trends and facilitate any planned improvements.

On receiving a noise complaint EMR staff will inform the depot manager immediately – (if the depot manager has not received a noise complaint directly) and then:

1. If a noise complaint has been received directly from complainant, the depot manager will:

- Ask questions of complainant for details of noise: noise characteristic (e.g. bang, engine noise etc.), time, date and location of receptor.
- Identify source of noise, description of activity and location on site.
- note meteorological / weather conditions (as recorded in site daily diary)
- Record details in daily site diary,
- Record details on Event log – ensuring all details as outlined above are included (e.g. source, description of activity and location on site).
- Inform SHE Specialist (who can assist in investigation and response)
- Investigate complaint.
- Complete investigation, including root cause analysis (RCA) and record all details in Event log and apply any mitigation measures and actions identified from the investigation and inform EA (local officer) by e mail or phone.
- Where appropriate conduct any relevant risk assessment prior to mitigation measures being applied.

2. If complaint is received via the Environment Agency, operational managers will ask questions of the EA officer for details (i.e. noise characteristic, time, date and location of receptor) and then follow the remainder of the steps exactly as prescribed above,

## **5.2 Noise Complaints Investigation and RCA**

All complaints are investigated by the Manager/SHE Specialist and recorded on EMR's internal (electronic) Assure SHE management system Event logs. Details of the complaints are recorded on the Event log and an investigation and root-cause analysis (RCA) is completed to ascertain any immediate/root causes and actions that may be taken and these are notified to the General Manager and SHE Specialist at the earliest opportunity.

As part of the investigation a noise assessment will be conducted as required to ascertain:

- What times are/were noise levels at their loudest?
- At what locations around the site the noise is / was loudest?
- What materials resulted in louder noise levels?
- What activities resulted in louder noise levels?
- The type of plant or equipment used that resulted in louder noise levels?
- Does the description of the noise in the complaint match that of the actual noise?
- What were the weather conditions, including wind direction (as recorded in the site diary)?
- How does the characteristics of the complaint correlate with daily monitoring and reporting.

Most of this information will be obtained from the initial recording and reporting of the detail as outlined in section 4.1 but if any crucial details are missing then these must be followed up, if possible and where relevant to facilitate any RCA (Root Cause Analysis)

All investigations will be recorded on the SHE Managements system as an Event log to facilitate assessment, actions and mitigation measures. The data will also be useful for monitoring and identifying any trends.

## **6. COMMUNITY LIAISON**

Community liaison meetings will be considered and will be held to ensure a good standard of communication between operators and potentially affected parts of the community (scheduling and timing to be established). EMR possesses a Communication and PR department that looks at all forms of community liaison and communications and if required they will reach out to a local community to improve or establish good relations through various initiatives (e.g. sponsorship of local football teams, charity events etc.).

At community liaison meetings feedback and discussion of issues with those impacted could be provided along with updates on any proposed changes of working at the site.

Complaints received from the local community would be reviewed and any patterns in complaint activity and impact will help to inform any necessary additional future procedural changes or possible mitigation works at the site, in addition to local community initiatives.

## **7. ROUTINE ACTIVITIES, NOISE IDENTIFICATION AND ASSESSMENT**

On a daily basis and after the start of operations a member of staff (usually the depot manager or supervisor) will go to the site boundaries and audibly assess the noise from all activities (tipping, mobile plant, ship loading) etc. as part of their daily site walk-round / tour and recorded in the site diary. Meteorological measurements will also be taken on a daily basis including wind speed, wind direction and temperature which, will be recorded in the site daily diary.

This information and data may be supported by noise monitoring from time to time (as required) using a hand-held sound level meter (by a trained and competent person) as and when required or the procurement of a an approved and accredited noise consultant but will normally rely on a person's hearing (as environmental noise is more subjective than occupational health noise).

### **7.1 Noisy Activities**

For noisy activities (e.g. tipping, loading /unloading and movement of OA and P&G ), work will be planned where practical so that movement, tipping and loading of larger and noisier items of scrap which, may produce noise pollution will not be performed before certain times:

**OA, P&G, aluminium wheels tipping, unloading and loading will not be permitted before 8am in the mornings (including Saturdays).**

This timing restriction will be written into the Environmental Management Plan (EMP) and Noise Management Plan (NMP) and therefore regulated as such (as accorded by a site EMS).

### **7.2 Noise Mitigation: SMART Working Practices**

1. SMART working practices will be implemented, which will include:

- Careful movement and loading of heavier grades such as OA / P&G.
- Not using steel girders to scrape the ground – use of wire brush or chains or old rubber conveyor to minimise noise instead
- Better positioning of the material handlers to reduce handling distances
- Operatives informed not to ‘throw’ scrap onto heaps / into vehicles or onto heaps where practical – always move and ‘place’ scrap where possible; although swinging of a grab to aim at different / inaccessible part of a stockpile may be required (albeit rarely) in certain circumstances e.g. to reach inaccessible parts of heap.
- Operatives to minimise the clanking of grab jaws
- Operatives to minimise use of vehicle horns
- No dropping (‘banging’) of grab on to concrete surface at end of task / activity when resting grab (gently lowering instead)
- Positioning grab crane correctly so that the distance scrap travels will be minimised (swinging of grab is inevitable in some, rare stockpiling activities).
- Considerate placement and location of stockpiles to reduce double handling.
- Speed limit reduced to 5mph.
- No mobile plant, vehicle or fixed plant engines or electric motors left idling unnecessarily (this is also a requirement of the site DEMP and for the Energy Management System planned to be rolled out on site).

SMART working practices will be reinforced / monitored on a daily basis by Site Management (as part of manager’s / supervisor’s daily walk round / site inspection) but recorded weekly on the NMP Check Sheet (SMART 1-11), as shown in Appendix 3.

2. There are no stipulated operating times reflected in the permit where vehicles are able to be loaded or tipped outside normal working hours; EMR will however schedule all operational activities within appropriate agreed hours where required.

3. EMR management will plan the handling, movement and tipping of noisier scrap (e.g. aluminium wheels, heavier scrap) during more acceptable hours (avoiding early mornings and evenings) and not all before 08:00 am, in order to mitigate any potential noise pollution at unsociable hours. As site operations normally cease between 16:00 -17:00 evening noise impact will be rare if not non-existent.

4. All site staff will be informed of the importance of reducing noise levels and the additional importance of employing SMART working practices. This will be reinforced with regular toolbox talks, in huddles the display of posters/notices etc. and in some cases disciplinary action if appropriate.

5. SMART practices and noise mitigation will be implemented and monitored through a number of measures:

- Training and awareness of all operational staff (in the form of formal training using Safe Working Procedures and / or Tool Box Talks (TBTs) –recorded electronically and in also discussed in more informal ‘huddles’.
- The depot manager will assess (audibly) whether there are signs of excessive noise (above normal levels), SMART practices not being used as part of his daily site inspections / walk round and recorded on the weekly SMART. If this is the case then these will be recorded, investigated and any actions (including in some circumstances disciplinary measures) agreed.

If a certain activity generates excessive noise and / or more than five complaints are received (from different individuals) then a formal noise monitoring assessment will be arranged (i.e. measurements using hand held metre by competent person or employment of noise consultant).

### **7.3 Contingency Measures**

Contingency measures will be employed if there are influential changes in site circumstances, management control, operational aspects which would impact on noise levels or there is a sudden increase in complaints received or high levels of noise are detected externally to the site - elsewhere on the Industrial site, surrounding receptors (residential) etc. (see Appendix 4 – Contingency Management Plan).

For example if more than 5 complaints (from 5 separate sources) are received in succession, within 1-2 weeks (trigger value) then appropriate contingency measures will be enacted for increased complaints an investigation will be conducted to investigate the complaints (see Section 4 above), any potential noise pollution incident and the causes recorded on an Event Log (electronic SHE management system).

If a compliant investigation shows that there has been a noise pollution incident (investigation may include quantitative noise measurements) then the process will be brought back into compliance and control i.e. SMART practices employed / re-employed / mitigation measures taken etc. (see Section 4 above) and the Environment Agency (local EA officer) will be informed (by e mail) of the measures taken and the eventual outcome (e.g. cessation of complaints, mitigation measures applied).

Formal quantitative noise monitoring will be organised from time to time if deemed necessary (e.g. due to dramatic increase in number of complaints or significant change in site activities, generating additional noise) and also dependent on the right conditions – operational/weather/wind direction etc. This may entail the use of an approved external consultant and the use of appropriate noise measuring equipment as required.

## **8. MANAGEMENT OF NOISE RELEASES (INCLUDING CONTAINMENT)**

EMR have reviewed engineering mitigation measures using external consultants at other EMR sites and their feasibility /practicality of use considering, primarily, duties under the *Health and Safety at Work Act 1974* and a wide variety of health and safety related regulations, in addition to environmental regulations to explore the feasibility of a range of mitigation measures, as outlined below.

### **8.1 Building Enclosure**

The ELV (End of Life Vehicle) depollution and processing activities and most non-ferrous metal activities (including tipping and loading of aluminium wheels) takes place within the large building enclosure (as indicated in the site layout plan).

Studies and assessments at other similar facilities have shown that enclosing all or most of a large ferrous and non-ferrous metal operations of the site in a building is not a sensible option, as there is the increased risk of fire hazards e.g. smoke in an enclosed building, enormous operational constraints and heavier ferrous scrap (with lower sound frequencies) would generate reverberation and vibration within a large building, creating an increased hazard for operational staff, which would also include the increased movements of mobile

plant within the building, with the resulting risk to human health (i.e. from exhaust emissions). Costs of construction and maintenance (which would make the site non-viable). Vehicle tipping and loading, which has been identified as primary sources of noise, would still need to be conducted externally. Additionally the combination of structural steels within the building and workplace transport increases the risk of accidents and potential fatalities.

However a substantial part of the sites operations does take place within a large building located on site (including all ELV depollution and processing activities and most non-ferrous processing activities).

EMR Silvertown is committed to keeping further infrastructural engineering aspects (providing noise mitigation) under review and will apply any additional engineering solutions, following a risk assessment, determined as viable for implementation. In the meantime, procedural management controls and other mitigation measures will be identified and evaluated to facilitate any reduction in noise levels.

## **8.2 Contingency Management**

Occasionally situations arise that result in increased noise levels. These may include mechanical or human factors and the following:

- Operators not adhering to SMART practices
- Essential and skilled staff absent / sick e.g. normal crane operators when vehicles require loading.
- Manager or essential members of staff (especially crane operators) absent (holidays, training course) / off sick
- Equipment breakdown / malfunction (e.g. cranes)
- Queuing traffic: if vehicles are queuing outside on road (Factory Road) before 07:00.

Backstop contingency measures: If the noise levels are severe (large increase in numbers and frequency of complaints) then temporary cessation of noise related activities will be enacted until measures can be taken to reduce noise to reasonable levels. There may be circumstances that this is not immediately possible and therefore that activity may need to continue then the Environment Agency will be contacted by telephone and / or e mail outlining this.

Vehicles when queuing or waiting on site must turn off their engines (infrequent customers requested to do this by operational staff) and idling discouraged. Suitable signs located in strategic locations can support this.

Queuing traffic: if vehicles are queuing outside on road (Factory Rd) before 07:00 am then where possible this can be mitigated against by arranging with EMR Transport (Erith) to stagger vehicle arrival times at site (this will include all EMR vehicles and contracted hauliers and some major account customers).

## **9. NOISE MANAGEMENT PROCEDURE**

Effective management and mitigation in most cases encompasses good source and pathway control (with the Source – Pathway – Receptor model in mind) or reducing, eliminating the source pathway entirely.

### **9.1 Noise management and Control.**



The Site Management is responsible for the control and removal of any nuisance on site.

1. Site operational hours and activities must be adhered to according to planning permission and/or environmental permit conditions at all times.
2. Schedule tipping and loading within appropriate agreed hours wherever feasible.
3. Plan loading and load ships, with heavier scrap during agreed hours, in order to mitigate any potential noise pollution dependent on tides and ship availability.
4. As required by the site permit, conduct noise assessment / monitoring (by ear) at the site boundaries to ensure excessive noise is not causing a nuisance (quayside, west boundary, east boundary & entrance). Assessments can be carried out by a competent person daily and must be recorded in the site daily diary.
5. Noise assessment (by person) will be conducted at the southern boundary (boundary closest to River Thames), eastern boundary, the western boundary and the northern boundary (at both site entrances).
6. Any elevated or excessive noise must be recorded in the site daily diary and an investigation will be carried out and recorded on an (Assure) Event log with subsequent actions or mitigation measures recorded on Action logs.
7. On a weekly basis site monitoring (by person) must be conducted using the SMART practices spreadsheet (as shown in Appendix 3).
8. All Site Operatives must ensure that site machinery are operated and maintained in accordance with the manufacturers' specification. This is best achieved by ensuring plant and machinery is recorded on the electronic MRO asset list, this will then automatically flag requirements for maintenance, statutory inspections (e.g. LOLER), warranty servicing, Allianz (insurance engineers) inspections and will facilitate any required repairs.
9. All Site Operatives must ensure that care is taken to minimise the drop height of heavy metals (e.g. OA and No. 1 and 2 when unloading and loading materials).
10. SMART working practices must be adhered to at all times (see section 6.1 above).
11. All management procedures as detailed in the site's Noise Management Plan and /or Environmental Management Plan must be adhered to.
12. Site Management must investigate and document all complaints received on an Event Log and contact the SHE Specialist.
13. Prior to any proposed noise mitigation measures, infrastructural changes an Environmental Risk assessment must be conducted and recorded and any relevant control measures identified then implemented.
14. Any compliance checks must be recorded on the relevant form / check sheet and any breaches in compliance recorded on an Event log.

## **9.2 Recording of weather conditions / meteorological data**

Meteorological data and weather conditions are measured daily by accessing the Metoffice website for Silvertown: <https://www.metoffice.gov.uk/silvertown> which includes wind speeds and direction and is recorded in the daily site diary (see Appendix).

## **9.3 Plant Equipment and Machinery**

All plant equipment and machinery will undergo regular scheduled maintenance and inspections and form part of a maintenance programme and regular inspections as required by EMR's SHE (Safety Health and Environment) management plan. In addition to internal inspections and checks, EMR utilises Allianz (insurance company) who regularly send qualified engineers to inspect plant equipment and machinery on a scheduled basis and any defects are reported and recorded (electronically) and actions for repairs / improvements are logged with timescale given (e.g. Cat A is immediate).

All plant equipment and machinery is inspected as part of pre-start checks on a daily basis before starting any plant equipment and machinery and any defects reported and recorded with action and timescales for repair.

All mobile plant will have white noise reversing alarms reducing the potential impact of noise on the local community.

## **9.4 Other Mitigation measures**

A large part of scrap metal processing on site (ferrous & non-ferrous) comprises volume and size reduction, to rationalise and consolidate loads facilitating bulking of the scrap material prior to transfer for further treatment or as product. This also includes cutting of material into smaller pieces (e.g. with shear / croppers), loading of smaller sized material (whether into vehicles or lorries) has the benefit of generating less noise.

The shear is partially enclosed in steel housing, which forms a barrier against any propagation of noise from this equipment, although shears and balers generate low levels of noise in comparison to tipping and loading of metal.

All mobile and fixed plant is recorded on the electronic asset list, triggering scheduled maintenance, statutory inspection (i.e. Allianz inspections) requirements etc. so that plant and machinery is operating at optimum efficiency and effectiveness avoiding the generation of excessive noise and vibration (e.g. loose casing, or damaged bearings). All plant must be inspected using controlled pre-use check sheets (designated to each type of plant) and defects are recorded on an Action log.

## **10. NOISE MONITORING**

Quantitative noise monitoring (using a calibrated monitor) will be performed as and when required, this is normally following a series of complaints (>5 from separate persons), a major change in an operational activity (e.g. new shear) or a permit variation. Measurements (dB (A)) will be taken within the site's permitted boundary (close to activities and at the site boundaries) and also at specific pre-determined and identified external sensitive receptors sites (such as those identified in this document).

All complaints, major noise impacts / incidents etc. received or detected are recorded on an Event log, which will also include other relevant data such as meteorological data, description of activities etc. This will provide useful data (frequency, show trends, primary

sources) etc. and which will facilitate any mitigation measures or improvements that can be made.

Noise incidents and complaints are also recorded (on Event logs) to facilitate analysis, show trends, frequency, primary sources etc.

## **11. MANAGEMENT PLAN AND REVIEW**

Any mitigation measures and controls determined and agreed following investigations and evaluation of measures to be taken will be implemented into the site Environmental Management System (EMS) including adding to and updating of any procedures, processes written into the Environmental Management Plan (formerly working plan) and Environmental Protection Procedures (EPPs) that form part of the EMS. Any changes to the EMS will be with agreement and approval by the Environment Agency.

A review of the noise management plan will be held annually to identify trends as well as the effectiveness of present procedures and any further mitigation methods that may be implemented. Complaints in the Event Log will also be analysed (as outlined in Section 10) to determine any improvements / mitigation measures that may be taken.

## **REFERENCES**

*EA Guidance, Noise and Vibration Management: Environmental Permits (31 January 2022)*

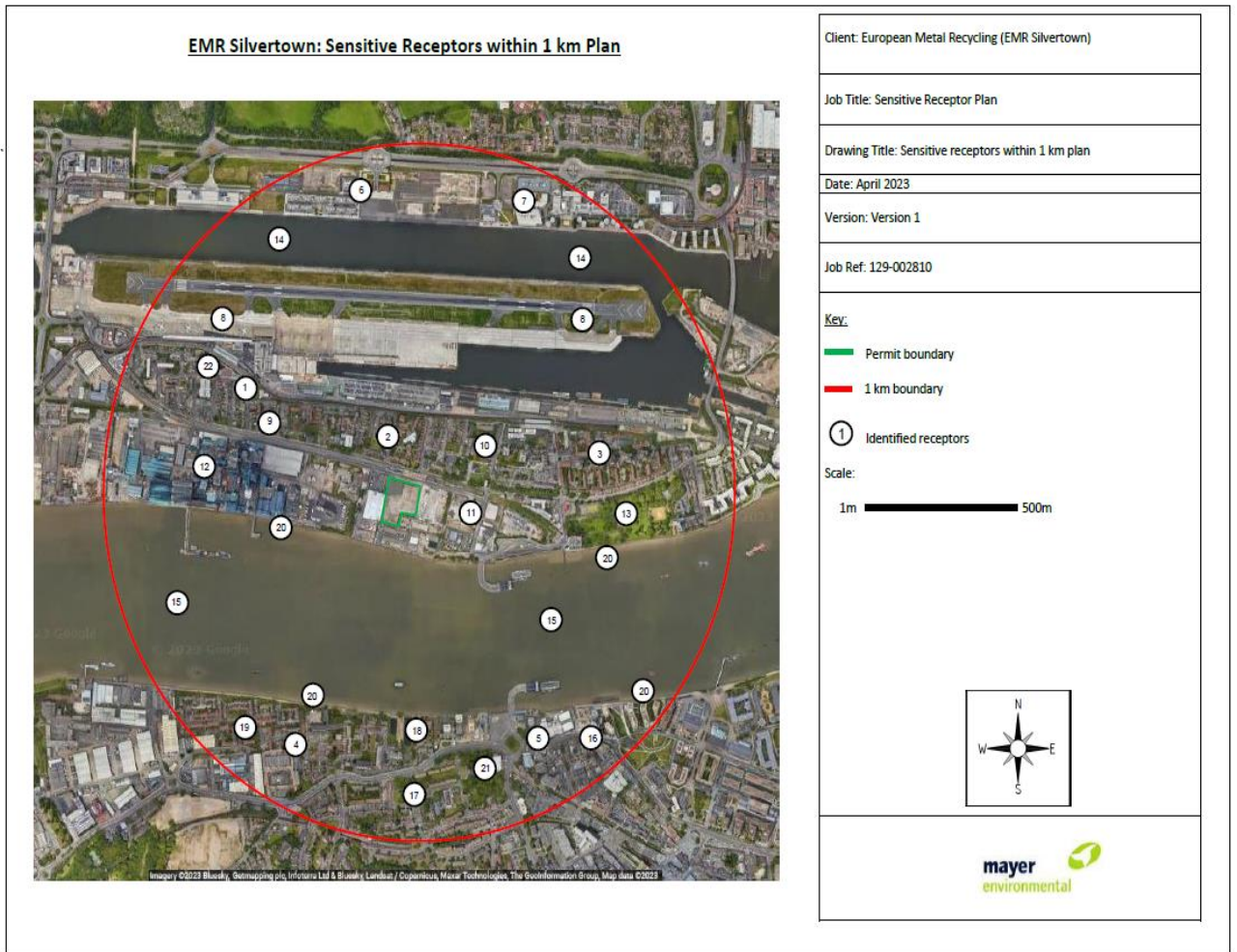
*Noise Impact Assessment (BroodBakker Ltd) Ref: 230206 BAC DB EMR Silv. NIA*

*Environmental Permit: EPR/WE1242AA*

*EMR Silvertown Environmental Management Plan (EMP)*

*Environmental Protection Procedures (EPPs)*

# APPENDIX 1 – Sensitive Receptor Map and Locations



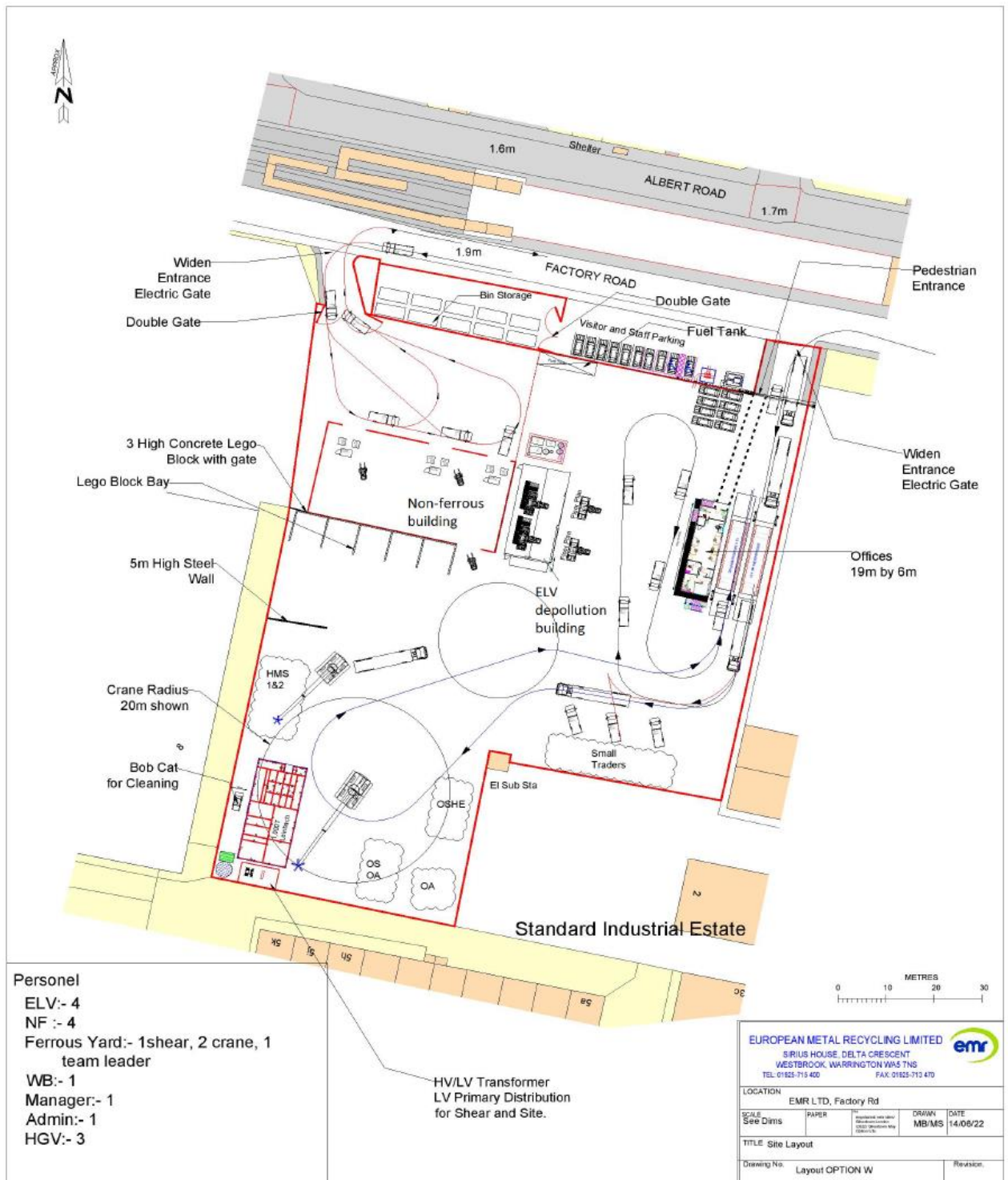
Human Receptors.

Receptor Type	Map Ref.	Sector 1 (NE)	Map Ref.	Sector 2 (SE)	Map Ref.	Sector 3 (SW)	Map Ref.	Sector 4 (NW)
Residential	3	Residential properties on Brixham Street, Dockland Street, Rymill Street, Rebourne Way, Antwerp Way, Pier Road, Woodman Street, Clermont Street, Storey Street, Glenister Street, Robert Street, Church Street, Station Street, Milk Street, Fishguard Way, Grimsby Grove, Barge House Road, Hartlepool Close, Woolwich Manor Way.	5	Residential Properties on Duke of Wellington Avenue, Monk Street, Market Street.	4	Residential properties on Harlinger Street, Ruston Road, Spindle Close, Antelope Road, Boneta Road, Venus Road, Leda Road, Europe Road, Lord Warwick Street, Sunsbury Street, St Mary Street, Kingsman Street.	1	Residential properties on Drew Road, Parker Street, Parker close, Saville Road, Wythes Road, Leonard Street, Holt Road, Lord Street, Muir Street, Newland Street, Tate Road, Ben Tillet Close.
							2	Residential properties on Rawsthorne Close, Kennard Street, Sheldrake Close, Winifred Street, Fernhill Street, Manwood Street, Silverland Street, Grenadier Street.
Commercial / Industrial / Recreational (Inc. schools and places of worship)	7	London Design and Engineering UTC, Docklands Library, Way Out East Gallery, Knowledge Dock Business and Innovation Centre, Pronto Eat, Costa Coffee, University of East London Dockland Campus, LEYF - Children's	11	The Metal Recycling Group, BT/Openreach, LoveWorld UK, Hanson Direct Mail, Go-Ahead London, Ady's Garage, Woolwich Foot Tunnel.	19	Gaidam Carpentry, Euro Car Parts, Mate Bike, Le Wouri, McDonald's, InstaVolt Charging Station, Harlinger Lodge Annexe, Roman Tiles, Sparks Theatrical	6	London Borough of Newham Altitude Jobcentre, Royal Albert Quay, Altitude, RAD London, Beckton Park DLR Station.
		Centre, Fight For Peace, Jummah Salah, Ganicreates.		Kingsman Parade Sub Post Office.				
	13	Royal Victoria Gardens, Phoenix Bowls club.	18	Lower Mast House, Global Language Expert, Sky Sail House, Woolwich Dockyard Drydocks, Tee Me Up, Woolwich Dockyard Fishing Lakes, Clockhouse Community Centre.				

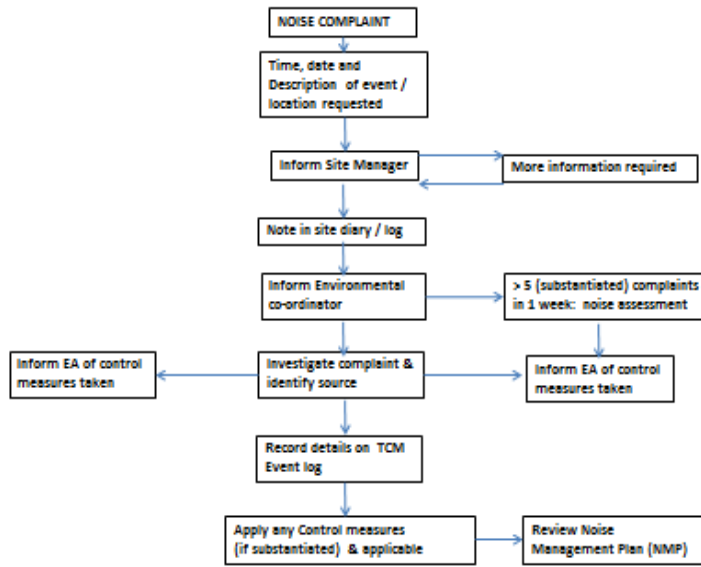
Nature and Heritage Conservation Sites (Source DEFRA MAGIC MAP).

Receptor Type	Map Ref.	Sector 1 (NE)	Map Ref.	Sector 2 (SE)	Map Ref.	Sector 3 (SW)	Map Ref.	Sector 4 (NW)
Woodland Improvement zone		Scattered areas around St Mary's Church and Royal Victoria Gardens.						
Priority Habitat Inventory Mudflat			20	Mudflat	20	Mudflat		
Priority Habitat Inventory Deciduous Woodland			21	Deciduous Woodland				
Flood risk information for the site location		The site is in flood zone 3. This means it has a high probability of flooding from rivers and the sea. (Source: Flood map for planning).						
Keeping Rivers Cool		Covers the North East and South West of the site.						
Groundwater Vulnerability Map		Medium-High.						
Soilscape		Loamy and clayey soils of coastal flats with naturally high groundwater.						
Air Quality Management Area (AQMA)		Newham AQMA- Particulate Matter PM10 and Nitrogen dioxide NO2.						
Royal Albert Dock	14	Royal Albert Dock					14	Royal Albert Dock
River Thames			15	River Thames	15	River Thames		

# APPENDIX 2 – Site Plan



### APPENDIX 3 – Noise Complaint Process





## APPENDIX 4 – Weekly SMART Practices Check Sheet (SMART 1-11)

NOISE MANAGEMENT PLAN CHECK SHEET (EMR Silvertown)			
	Mitigation Measures	Yes / No	Comments or actions required
<b>SMART Operational Measures</b>			
SMART 1	Are agreed operational hours: 07:00 -17:00 week days; 07:00-12:00 Saturdays being applied (Includes managing queuing traffic)?		
	<i>If work outside permits hours required EA to be informed.</i>		
SMART 2	Tool Box talks been delivered (encompassing new starters and refreshers)?		
	<i>Detail Noise related TBT, date and time where relevant</i>		
SMART 3	Tipping / loading & unloading vehicles any users who generate unnecessary noise warned / re-trained?		
	<i>Operatives not using SMART practices potentially face disciplinary measures</i>		
SMART 4	Elimination of unnecessary scrap drop heights and throwing of scrap?		
	<i>Detail operative / machine responsible - identify and praise good practice too</i>		
SMART 5	Proper use of wire brush or old conveyor belt (rather than girder) for sweeping?		
	<i>Enter time, where relevant (to help address any complaints) &amp; identify operative as above.</i>		
SMART 6	Are grab jaws being banged onto concrete flooring?		
	Are grab jaws deliberately being clanked closed?		
	Have white noise reversing beepers on all permanent site mobile plant?		
	<i>Detail operative / machine responsible - identify and praise good practice too</i>		
SMART 7	Is there any machinery observed not being maintained as required (includes shear and mobile plant) -all machines need to be listed on MOR to schedule regular maintenance & inspections?		
SMART 8	Positioning grab crane correctly so that the distance scrap travels will be minimised and considerate placement and location of stockpiles to reduce double handling?		
SMART 9	Posters and signage on prominent display (e.g. use of SMART practices)?		
SMART 10	Careful handling, moving, loading and stockpiling of noisier grades (OA, P&G and aluminium wheels)?		
SMART 11	Are all vehicles keeping to speedlimit and below of 5mph and is 'no idling' of vehicles being enforced (are engines turned off when stationary)?		
<b>Noise Complaint</b>	Check Metoffice Report and Site Diary		
	Log in site diary		
	Log any other noise from external source		
	Formally record on Event Log (if substantiated to be coming from )		
	Feedback to the Environment Agency or Local Authority		
	All deviations from SMART working practices investigated, rectified and discussed in site 'Huddles'		
	Monthly review of adherence to all SMART working practices		
	<b>Comment:</b>		
All actions required will be recorded on the SHE action log with a relevant timescale for completion.			
<b>Checked by (Name)</b>			
<b>Checked by (Signature)</b>			
<b>Date and time:</b>			



## APPENDIX 5 - Contingency Management Plan

Contingency Management Plan			
Date:		Manager:	
Contingency / Issue	Mitigation / Action	Resolution (date completed)	Comments
1 Operators not adhering to SMART practices	Re-training (e.g. Tool Box Talks) /disciplinary procedures / Manager site walk round frequency increased		
2 Essential, skilled staff absent / sick e.g. normal gantry crane operators when ship requires loading.	Plan in advance / standby staff		
3 Manager absent (holidays, training course) / off sick	Assistant manager as stand in		
4 Equipment breakdown / malfunction (e.g. cranes)	Preventative maintenance / Allianz inspections / internal inspections		
5 Ship loading for heavy materials e.g. OA or nearly all OA (or other heavy scrap)	Loading to be monitored by supervisor to ensure SMART practicies are strictly observed		
6 Unusual activities required e.g. 'projecting' scrap by swinging grab crane to reach unaccessible parts of a ship (unaccesible by normal loading).	Planned and recorded. Only used as required.		
7 Ship requires quick tum round (because of delays etc.)	EA made aware (by e mail)		
8 Contractors / non EMR vehicles unaware of normal operational hours	Conrtrolling office contacted and informed of correct operational hours (followed uo be e mail)		
9 More than 6 x complaints received within week -	Triggers formal noise survey / assessment		

## APPENDIX 6 – Site Diary



### 1.2.2.3 Site Daily Diary

<b>Site Location/Name:</b>				<b>Date of report:</b>			
<b>Technically Competent Manager Name:</b>							
<b>Time In:</b>				<b>Time Out:</b>			
Check Items			Circle as applicable			Comments/Issues	
1	Any non-permitted waste?	Y	N	n/a	Describe:		
2	Is dust / mud leaving site?	Y	N	n/a	Describe:		
3	Is there excessive noise/vibration?	Y	N	n/a	Describe:		
4	Is there a strong odour on site?	Y	N	n/a	Describe:		
5	Are security measures fully operational? (gates, fences/walls, locks, CCTV etc.)	Y	N	n/a			
6	Is pest control in place?	Y	N	n/a			
7	Any smoke/dust generated on site?	Y	N	n/a	Describe:		
8	Are radiation detectors functioning?	Y	N	n/a			
9	Any significant maintenance/construction work in progress?	Y	N	n/a	Describe:		
10	H&S and Env. signage in place?	Y	N	n/a			
11	Traffic routes clear of debris?	Y	N	n/a			
12	Loading/Unloading/Tipping areas suitable? (ground condition, gradient, weather conditions etc.)	Y	N	n/a	Describe:		
13	Vehicle and pedestrian circulate in a safe manner; pedestrian walkways and crossings in good condition and pedestrians wearing high-vis, safety helmet & correct PPE?						
14	Process plant operating?	Y	N	n/a	<b>Machine Name</b>	<b>Start</b>	<b>Finish</b>
		Y	N	n/a			
		Y	N	n/a			
15	All emergency exits clear?	Y	N	n/a			
16	Dust curtain/netting intact?	Y	N	n/a			
17	Any plant/equipment breakdown?	Y	N	n/a	Describe:		
18	Housekeeping / litter controlled?	Y	N	n/a	Describe:		
19	Spillages cleared up?	Y	N	n/a			
20	Any complaints received?	Y	N	n/a			
21	Bunded Storage sound & secure? (ELV, Derv/Gas Oil, Drums, Turnings, Engines etc)	Y	N	n/a			
22	Dust suppression in use?	Y	N	n/a	Describe:		
23	Fire Fighting equipment operational?	Y	N	n/a			
24	Fire watch / checks completed?	Y	N	n/a	Describe:		
25	Discharge point running clear?	Y	N	n/a			
26	Gullies, drains, interceptor inspected?	Y	N	n/a			
27	Site free from flooding/ponding?	Y	N	n/a			
28	Any Waste rejected from site	Y	N	n/a			
29	Batteries stored correctly? (Ref. EPP 2.3)	Y	N	n/a			
30	Other Issues to note (e.g. external activities potentially causing a nuisance/impact):						
<b>Weather</b>		General Description (e.g. Dry, rain, snow etc.)			Temperature:		Wind: (Speed, direction)
AM							
PM							
Additional Action taken due to weather (for example dampening down):							

<b>Issue:</b>	1	<b>Version:</b>	7	<b>Date:</b>	22-Sep-2021	<b>Parent document:</b>	
<b>Approved for IMS:</b>	Danny Swygart		<b>Document owner:</b>	Regional SHE Manager - South East		Page 1 of 1	

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