



Environment  
Agency

# Notice of request for more information

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

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Lesley Kay Foss, Company Secretary

Britaniacrest Recycling Limited  
26 Reigate Road  
Hookwood  
Horley  
Surrey  
RH6 0HJ

Application number: EPR/CB3308T/V002

Copy to Chris Foss and Keith Riley: [cfoss@britaniacrestrecycling.co.uk](mailto:cfoss@britaniacrestrecycling.co.uk) and [k9riley@aol.com](mailto:k9riley@aol.com).

The Environment Agency, in exercise of its powers under paragraph 4 of Part 1 of Schedule 5 of the above Regulations, requires you to provide the information detailed in the attached schedule. The information is required in order to determine your application for a permit duly made on 08/04/2021.

Send the information to either the email or postal address below by 18/10/2021. If we do not receive this information by the date specified then we may treat your application as having been withdrawn or it may be refused. If this happens you may lose your application fee.

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

Postal address:

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

Name	Date
Permitting Officer	23/08/2021

Authorised on behalf of the Environment Agency

**Notes**

These notes do not form part of this notice.

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

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

## Schedule

Please provide further information in response to the questions below:

### Noise Impact Assessment

- 1) Provide a revised noise impact assessment in accordance with BS4142 addressing the following points:
  - a. The revised noise impact assessment must contain an appropriate background noise survey.

*The background noise survey did not contain site wind speed and direction data recorded at receptors as required in BS 4142 and is not a reliable guide to actual background levels. Instead the consultant referred to data obtained at Horley which is approximately 15 km to the north-east. Given that there are major roads (the A264 dual carriageway 0.7 km to south and A24 1 km to west) in the area this increases the uncertainty of the survey results and impact estimations as winds from these directions could have increased the measured background levels.*
  - b. The revised noise impact assessment must consider impacts at all existing relevant sensitive receptors.

*Receptors at Andrews Farm have the potential to be impacted and have not been considered in the assessment.*
  - c. The revised noise impact assessment must consider impacts at potential receptors at relevant developments which have received planning permission or have the potential to received planning permission prior to the completion of determination of this permit application.

*The Land North of Horsham development has Planning Permission and has not been included as a receptor in the impact assessment.*
  - d. The revised noise impact assessment should include the application of an acoustic character correction in the case of the Langhurst Moat and Bramblehurst receptors where we estimate the specific levels could be high enough to be audible as characteristic noise at night-time.

*We consider that an acoustic character correction of + 3 dBA could be appropriate for the closest eastern receptors at night-time.*

### Noise Management Plan

- 2) Please resubmit a revised Noise Management Plan containing a commitment to acoustic screening for the sides of the Air Cooled Condensers. These should specifically be referred to in the table of BAT measures.

### Site Condition Report

- 3) Please submit appendices:
  - a. F.1 Operating Techniques
  - b. F.2 Application Site Condition Report
  - c. F.3 Ground Conditions Desk Top Study
  - d. F.4 Habitats Screening Report
  - e. F.5 Compliance Assessment Reports

*These appendices are referred to in the Site Condition Report but were not submitted with the application. Although these were not required for duly making as there is no additional land is being*

*added to the permit please submit these so that they are available if required for consideration during the determination process.*

### **Waste input**

- 4) Please provide additional details on the digestate which is proposed for acceptance at the Waste Transfer Station and also for input to the Energy Recovery Facility. This should include where it would come from, what format it would be received onto the site and likely quantities.

*Digestate can be recycled e.g. spread to land and therefore further information is required to demonstrate that the waste hierarchy is being followed if digestate is to be accepted. Digestate can also require specific containment and odour considerations depending on the quality and quantity.*

- 5) Please provide justification for the acceptance of end of life tyres including the source, the format, likely quantities and how it will be ensured that any wire within them would not impact on the grate.

*Tyres can be recycled and therefore more information is required to demonstrate that the waste hierarchy is being followed if these are to be accepted. Also the wire in tyres can cause issues with grates in some cases and therefore further information is needed about the format these are likely to be accepted in.*

### **Effluent discharge**

- 6) Please confirm whether the amenity effluent discharge on site will be able to meet the general binding rules for small sewage discharges.

*The discharge from the welfare facilities shouldn't be included in the permit and the reference to it in the existing permit is likely to be a historical error so we will either remove it or produce a separate water discharge permit for it as part of this determination.*

*A separate water discharge permit would normally be required for the discharge from site amenities unless the discharge can meet the general binding rules for small sewage discharges. One of the main general binding rules for discharges to surface water already appear to be met, i.e. it is secondary treated via an ETP, but there are a number of other criteria to also comply with.*