

# **EPR/CB3308T/V002 - RESPONSE TO SCHEDULE 5 NOTICE DATED 12/10/2021**

**Britaniacrest Recycling Limited**

JER8584

1

18 October 2021

## REPORT

### Document status

Version	Revision	Authored by	Reviewed by	Approved by	Review date
1	0	Joanna Bruce	Jennifer Stringer	Jennifer Stringer	13/10/2021
1	1	Joanna Bruce	Jennifer Stringer	Jennifer Stringer	18/10/2021

### Approval for issue

Jennifer Stringer



18 October 2021

This report was prepared by RPS within the terms of RPS engagement with its client and in direct response to a scope of services. This report is supplied for the sole and specific purpose for use by RPS client. The report does not account for any changes relating to the subject matter of the report, or any legislative or regulatory changes that have occurred since the report was produced and that may affect the report. RPS does not accept any responsibility or liability for loss whatsoever to any third party caused by, related to or arising out of any use or reliance on the report.

#### Prepared by:

**RPS**

Joanna Bruce  
Graduate Environmental Consultant

6-7 Lovers Walk  
Brighton, East Sussex BN1 6AH

T +44 1273 546 800  
E joanna.bruce@rpsgroup.com

#### Prepared for:

**Britaniacrest Recycling Limited**

## Contents

<b>1</b>	<b>INTRODUCTION .....</b>	<b>2</b>
<b>2</b>	<b>SCHEDULE 5 RESPONSES .....</b>	<b>3</b>
2.1	Noise Impact Assessment .....	3
2.2	Noise Management Plan .....	4
2.3	Site Condition Report .....	4
2.4	Waste input.....	4
2.5	Effluent Discharge.....	5

## Appendices

- Appendix A Updated Noise Impact Assessment
- Appendix B Updated Noise Management Plan
- Appendix C Application Site Condition and Baseline Report Appendices

# 1 INTRODUCTION

- 1.1 This document provides the response to the Schedule 5 Notice for more information issued on 23/08/2021. The notice sets out further information required by the Environment Agency (EA) to determine an application for permit EPR/CB3308T/V002 relating to Britaniacrest Recycling Limited.
- 1.2 Section 2 of this document sets out each question in the Schedule 5 Notice followed by the response.

## 2 SCHEDULE 5 RESPONSES

### 2.1 Noise Impact Assessment

**Question 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**
- b) **The revised noise impact assessment must consider impacts at all existing relevant sensitive receptors.**
- 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.**
- 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.**

**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.**

**Receptors at Andrews Farm have the potential to be impacted and have not been considered in the assessment.**

**The Land North of Horsham development has Planning Permission and has not been included as a receptor in the impact assessment.**

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

- 2.1.1 RPS has reviewed the Noise Impact Assessment and can confirm that there was a typo in the report which referred to the data being obtained from a meteorological station in Horley, whereas the data was actually obtained from a meteorological station 1.2 km to the south-west of the site in Holbrook. The EA confirmed in an e-mail dated 27<sup>th</sup> September 2021 that given the closer proximity of this weather station, the background survey data is acceptable. It was requested that the weather station data, and a grid reference or postcode for the weather station be submitted with the revised noise impact assessment. This information has been included in the revised noise impact assessment report.
- 2.1.2 Andrews Farm has been added to the noise model and included in the revised noise impact assessment. Following a discussion with the EA held on 20<sup>th</sup> September 2021 it was agreed that baseline sound monitoring data from 3 Station Road would be used to characterise baseline sound levels in this location.
- 2.1.3 A receptor called North Horsham Scheme has been included within the noise impact assessment. This receptor is located at the closest residential area within the Land North of Horsham development based on the Masterplans for the site that were included in the planning application made in 2016 (Ref: DC/16/1677). RPS is not aware of any more recent plans, and these are not available on the Wealden District Council planning portal, so it has been assumed

that the receptor location included in the noise model is representative of the closest residential properties within Land North of Horsham development.

- 2.1.4 The property Bramblehurst is derelict. Britannicrest is in the process of purchasing this property, so it would not be re-instated.
- 2.1.5 Based on the predictions carried out by RPS, the specific sound level at Langhurst Moat Cottage is during the night-time 38 dB  $L_{Aeq,T}$ , which is 4 dB below the background sound level of 42 dB  $L_{A90,T}$ . The main sound source is the air-cooled condensers (ACCs), however, these would only contribute 30 dB  $L_{Aeq,T}$  to the overall sound level, with some contribution from other sound sources. Therefore, there is unlikely to be any one prominent sound source at night. Furthermore, indoors with attenuation from a partially open window, sound levels from individual plant are likely to be below the threshold of hearing. The sound, if audible is likely to be experienced as a general broadband sound without any characteristic tones. On this basis a character correction is not considered to be appropriate in this context.
- 2.1.6 The revised noise impact assessment is provided in Appendix A.

## 2.2 Noise Management Plan

**Question 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.**

- 2.2.1 The updated noise management plan is provided in Appendix B

## 2.3 Site Condition Report

**Question 3: Please submit Appendices:**

- e) **F.1 Operating Techniques**
- f) **F.2 Application Site Condition Report**
- g) **F.3 Ground Conditions Desk Top Study**
- h) **F.4 Habitats Screening Report**
- i) **F.5 Compliance Assessment Reports**

- 2.3.1 Copies of the missing documents that support the site condition and baseline report are provided in Appendix C.

## 2.4 Waste input

**Question 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.**

- 2.4.1 The applicant is a waste management company that must have the ability to receive and process % spot waste+. i.e. waste that arrives at the site unplanned. An inability to handle such waste will negatively impact the applicant's ability to conduct its business. Any waste arriving in this way will, however, be checked to ensure compliance with the Permit. The application includes for digestate

only to allow the facility to receive such material that is out of specification and cannot be applied to land . i.e. cannot be recycled. It will not be commercially viable for producers of digestate that can be applied to land or recycled to pay the gate fee to dispose of it by incineration. There is no specific source of such digestate. The application is made to enable the facility to process such a waste stream should it arrive at the site. It is not the intent to process recyclable materials.

**Question 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.**

- 2.4.2 There is no intent to incinerate tyres for the reasons implied. These are included in the application because the facility will also act as a transfer station and the same situation applies as to the digestate above.

## 2.5 Effluent Discharge

**Question 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.**

- 2.5.1 There is a sealed septic tank on site and the effluent is tankered away. As a consequence there is no direct discharge to surface water and therefore a separate discharge permit is not necessary.

## Appendix A

# Updated Noise Impact Assessment



## Appendix B

# Updated Noise Management Plan

## Appendix C

# Application Site Condition and Baseline Report Appendices