

From: [Lee Tyrrell](#)
To: [Tim Ross](#)
Cc: lonracwamitab@gmail.com
Subject: RE: Permit Application - EPR/SP3425LX/A001 - Botany Way Waste Transfer Station - request re: application contact and noise assessment
Date: 05 September 2025 15:59:34
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Dear Tim,

Thank you for the follow-up and for explaining the Agency's expectation that an NIA accompanies the application. We wanted to clarify our position and propose a practical way forward.

First, we understand the distinction between permitting requirements and local operational controls, and our understanding has been that a Noise Impact Assessment is commissioned "if required"—i.e., where risk, inspection or site context demonstrates a need—rather than as a universal prerequisite. With that in mind, we remain of the view that an upfront NIA is not necessary for this application, for the following reasons:

- We run an almost identical operation at our Rainham, Essex site in open-fronted buildings and have had no recorded or substantiated noise complaints.
- We have discussed the proposal with Alex Hancock an acoustic consultant and with our Environment Agency consultant, Mike Goodgame, who has already reviewed the details with the acoustician. Their professional view is that the outcome is predictable as low risk. If the Agency nonetheless requires it, they can complete the review urgently.
- A commercial yard lies between our applicant yard and the nearest receptors, and there is also a cliff face providing additional topographical screening.
- We do not require night-time operations. We are happy to confirm operating hours of 07:00–18:00 Monday–Friday and 07:00–13:00 Saturday. If, in the unlikely event, night-time working were ever proposed in future, we accept that this would be an appropriate trigger to undertake an NIA at that point.

These points sit alongside the site context and controls we've already set out (industrial surroundings, plant placement away from receptors, internal screening/stockpiles, resilient mounts, and our ISO 14001 EMS complaints procedure with rapid response).

The above would be supported by a concise Noise Management Plan (NMP) capturing our controls, hours, complaints handling, and clear triggers for commissioning an NIA (e.g., any substantiated complaint; any proposal for night-time working; material change in plant/layout; or at the request of

inspecting officers).

We hope this addresses your concerns while keeping the evidence proportionate to the risk. We're keen to align with the Agency's expectations and would welcome your further steer.

Have a great weekend,

Lee Tyrrell

Associate Director of Operations & IT

All prices quoted are ex-VAT



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From: Lee Tyrrell

Sent: 01 September 2025 14:40

To: 'tim.ross@environment-agency.gov.uk' <tim.ross@environment-agency.gov.uk>

Cc: 'lonracwamitab@gmail.com' <lonracwamitab@gmail.com>

Subject: FW: Permit Application - EPR/SP3425LX/A001 - Botany Way Waste Transfer Station - request re: application contact and noise assessment

Dear Tim,

Good to speak with you last week and as promised here are my thoughts regarding the noise survey/NIA you mentioned.

For clarity—and further to the below email where we said we would look into preparing a noise survey/NIA—we understand this would be undertaken if required by inspecting officers, rather than as a permitting prerequisite for this application.

We operate under an ISO 14001–certified EMS (lead: Emma Sharp); at our permitted Rainham, Essex site (EPR/YP3981NY) we have no recorded or substantiated noise complaints, and while the operational buildings are open-fronted, our controls keep off-site noise impacts low.

As part of the application, we used the EA's default environmental risk assessment for both the

standard rules permits 2015 No6 and 2022 No4 as the basis for the assessment.

We then included site specific factors for the application site Purfleet, Essex, including the following factors:

- i) The closest sensitive receptors (residents) are approximately 150 m from the operational buildings at site and are around 120 ft (~36 m) above the site. They are also typically upwind relative to the prevailing wind, which further reduces the likelihood of downwind noise propagation to these receptors. Any noise emitted from our operations (medium risk) would be perceived within the existing industrial soundscape, as other industrial activities are located between and around our site, including an external crushing and screening facility at some 80 m distance. As part of our due diligence in gathering information for consideration in our environmental risk assessment we have spoken to our neighbours, in particular the neighbour in waste management that carries out a crushing and screening operation with an environmental permit in place since 2002 who confirms that their external operation has received no noise complaints since the issue of their environmental permit.
- ii) In section 1.3 of its environmental risk assessment for standard rules 2022 No4 the EA considers likelihood of noise affecting a receptor as low although the overall risk is given as medium without further controls as detailed - the application site contains existing enclosed buildings.
- iii) We operate to ISO14001 across all our activities and services within which is a complaints section. In the unlikely event of a complaint about noise being received, we provide a single point of contact displayed at the gate; complaints logged, investigated, and responded to within one working day; lessons learned fed back into the EMS.
- iv) As mentioned previously the application site will in effect be very similar to our existing facility (see CAR2 history) and from the operational design and layout, including internal layout, position the noisiest plant on the façades furthest from receptors and use internal walls/stock piles as screens. Isolate vibrating equipment on resilient mounts to prevent structure-borne noise. We are confident that our experiences and operational controls will be delivered at the application site i.e. low risk to receptors/neighbours.

We then included our existing bespoke permit (EPR/YP3981NY) experiences, as the site activities will be essentially identical, and considered our compliance, see above, relative to noise.

Our conclusion after assessing the above was that there was no requirement for the inclusion of a separate noise survey and accordingly a NIA with the application.

We are, of course, aware that should our operation cause noise pollution outside the site the regulator would require us to produce such a survey and plan and that would form part of the environmental permit conditions.

I trust this explains how we have addressed the potential emission of noise from our proposed activities.

Best Regards

Lee Tyrrell
Associate Director of Operations & IT

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From: Lee Tyrrell

Sent: 29 August 2025 11:55

To: 'tim.ross@environment-agency.gov.uk' <tim.ross@environment-agency.gov.uk>

Cc: 'lonracwamitab@gmail.com' <lonracwamitab@gmail.com>

Subject: RE: Permit Application - EPR/SP3425LX/A001 - Botany Way Waste Transfer Station - request re: application contact and noise assessment

Hi Tim,

Thanks for your email regarding EPR_SP3425LX_A001 (Botany Way WTS).

Primary contact: Lee Tyrrell, Associate Director, 01708 555 666, lee@sharpships.co.uk

Secondary Contact: Mike Goodgame, Environmental Consultant, lonracwamitab@gmail.com

We're preparing the following for you:

- Updated Noise Impact Assessment (BS 4142), incl. worst-case operations and mitigation.
- Noise Management Plan, including complaints procedure and monitoring.
- Updated site layout marking noise sources and receptors.
- Operational details (hours, throughput, HGV movements, plant list).

Please could you confirm any deadline for these items and whether you'd like a brief call this week to align on scope (e.g., receptors, assessment periods, and any site-specific concerns)?

Kind regards,

Lee Tyrrell

Associate Director of Operations & IT

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From: Tim Ross <tim.ross@environment-agency.gov.uk>

Sent: 29 August 2025 11:16

To: info <info@sharpskips.co.uk>

Subject: Permit Application - EPR/SP3425LX/A001 - Botany Way Waste Transfer Station - request re: application contact and noise assessment

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FAO of Emma Sharp

Dear Emma,

I am currently undertaking the Duly making checks for the submitted application for the Bespoke permit at Beacon Hill Industrial Estate, Botany Way, Purfleet-on-Thames, RM19 1SR permit application reference EPR/SP3425LX/A001. I understand on calling the provided contact telephone number that you are currently not in the office and was informed to send this email via the above email address, so that it can be forwarded for your attention.

Can I please firstly confirm that you are still the relevant person to contact regarding the application at this time or please provide an alternative contact for any application correspondence.

On my initial review of the application location this identifies that the application submission needs to be supported with a noise impact assessment (NIA) and noise management plan (NMP), can you please confirm if these are available to be provided to support the application. Without these we will potentially be unable to progress the application at this time.

Please note in addition to the NIA and NMP the initial review has identified additional information that will be required to support the application. If you can confirm by 05/09/2025 if a NIA and NMP are available to support the application then a decision on whether to progress the application through requesting further information to support its Duly making or returning the application can be made.

If you wish to discuss this request please contact me on the details below, please note that I will be out of the office this afternoon (29/08/25).

Regards

Tim Ross

Senior Permitting Officer, National Permitting Service

Waste Permitting Team Part of National Services E&B

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