

# **J SIMPSON WASTE MANAGEMENT**

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**ENVIRONMENTAL MANAGEMENT SYSTEM**

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**Noise Management Plan (NMP)  
Reference: EMS-OP-06**

**Version 2 Dated 25 September**

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**163-165 Brent Road  
International Trading Estate  
Southall  
UB2 5LJ**

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<b>J SIMPSON WASTE MANAGEMENT</b>	<h1>Noise Management Plan</h1>		
<b>Document Reference: EMS OP 06</b>	<b>Issue Number: 2</b>	<b>Issue Date: 25.09.2020</b>	

**DOCUMENT CONTROL SHEET**

Version Reference	Date	Reason for Change	Issued by
1	03.04.2020	Application for Environmental Permit	ARC
2	25.09.2020	Environment Agency requested technical data	ARC

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## 1. Introduction

### 1.1 Purpose

The purpose of these procedures is to guide staff and contractors in the safe conduct of their duties in a manner which controls the environmental impacts of the company's operations, with specific reference to noise management.

With reference to the guidance, a noise management plan may be required by the Environment Agency if:

- They think there may be a risk of noise and vibration pollution beyond the site boundary
- After getting a permit, you cause noise and vibration pollution but do not already have a noise and vibration management plan.

This version has been prepared to support an application for an Environmental Permit. It has been requested to support the application as the Environment Agency considers that there is a risk of noise pollution beyond the site boundary that could affect sensitive receptors which are located approximately 120m from the site.

An application was submitted to the Environment Agency on 2 June 2020. The application was supported by a Noise Management Plan.

The permit application was prepared in March/April 2020. This was during the lockdown period of the coronavirus pandemic. We were unable to obtain technical data at that time but proceeded with a Noise Management Plan to support the application. The operator's existing premises is due to be redeveloped and there is growing pressure to relocate to the new site. The permit application was therefore submitted in June 2020 to accommodate this relocation.

The Environment Agency returned the permit application on 15 September 2020 due to the lack of technical data. This Noise Management Plan has been updated to include the results of the Noise Impact Assessment, which was carried out on the 11 September 2020.

### 1.2 The Operator

The company has been operating for over 15 years, providing waste management services in London. They currently operate from a site in Willesden. The land is subject to redevelopment and therefore a new site is required to provide a replacement facility.

JSW provide a skip hire service to residents and businesses in London. They currently employ 25 staff. All of which will be transferred to the new site.

### 1.3 Scope

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These Operational Procedures cover:

- Operations involving non-hazardous waste
- Treatment of non-hazardous waste

The procedures relate to the permitted activities at 163-165 Brent Road, International Trading Estate, Southall, UB2 5LJ.

The site can meet the Standard Rules Permit SR2015 No6: 75kte household, commercial and industrial waste transfer station with treatment. The only exception to this, is the requirement to receive waste coded EWC 191212.

The Standard Rules Permit does not set any limit for the distance to residential property. The acceptance of 191212 does not alter the nature of the operations with respect to noise generating activities. This waste will be treated using the same equipment as the mixed construction and demolition wastes.

#### **1.4 Management System**

The Management System covers all aspects of operations and aims to effectively manage the impacts of the business on the environment. The key documents include:

- a) Documents: Procedures to set out how to undertake operations and checking for any issues.
  - EMS-OP-01 Operational Procedures
  - EMS-OP-02 Emergency Procedures
  - EMS-OP-03 Fire Prevention Plan
  - EMS-OP-04 Odour Management Plan
  - EMS-OP-05 Dust Management Plan
  - EMS-OP-06 Noise Management Plan
  
- b) Forms on which to record information and provide evidence of the system functioning properly.

Cross referencing to specific aspects in the EMS has been made in this report.

All documents will be kept in the site office.

#### **1.5 Site Location**

The procedures relate to the permitted activities at 163-165 Brent Road, International Trading Estate, Southall, UB2 5LJ.

The site is in an industrial estate.

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## 2 Operations

### 2.1 Waste Deliveries to Site

At the time of booking, the customer will be advised of the wastes that are permitted to be deposited within a skip. They will be advised that wastes including asbestos, waste electrical items, fluorescent tubes, gas cylinders, hazardous waste, oils and paints, solvents and tyres, are not permitted to be placed in the skip/container.

### 2.2 On Site Waste Acceptance

The driver will arrive at the site and provide Waste Transfer Notes to the site office. The driver will then be directed to the building. The waste will be visually checked as it is unloaded to ensure that the waste is acceptable.

The driver will then drive out of the building and leave the site. The banksman will check the vehicle wheels before exiting the building and instruct the driver to use the hose and brush if required.

Any incidents of non-conformance will be recorded in the Non-Permitted Waste Form EMS-FR-01 and corrective action taken.

### 2.3 Overview of Waste Processing

The site layout is shown on Drawing No JSW-BR-EP-02. A process flow diagram is provided in Figure 1. The majority of the waste accepted at the site is mixed construction and demolition waste. The waste codes set out in Table 1 provide the main list of waste to be accepted and its destination on site.

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**Table 1 –Wastes Typically Accepted at the Site**

<b>EWC Code</b>	<b>Description</b>	<b>Area in Site</b>	<b>Treatment Activities</b>
17 01 01	Concrete	Hardcore Bay	Separated and Stored
17 01 02	Bricks	Hardcore Bay	Separated and Stored
17 01 03	Tiles and ceramics	Hardcore Bay	Separated and Stored
17 01 07	Mixtures of concrete, bricks, tiles and ceramics other than those mentioned in 17 01 06	Hardcore Bay	Separated and Stored
17 02 01	Wood	Wood Bay	Separated and Stored, Wood may be shredded
17 02 03	Plastic	Plastic Bay	Separated and Stored
17 04 01	Copper, bronze, brass	Metal Container	Separated and Stored
17 04 02	Aluminium		
17 04 03	Lead		
17 04 04	Zinc		
17 04 05	Iron and Steel	Metal Container	Separated and Stored
17 04 06	Tin	Metal Container	Separated and Stored
17 04 07	Mixed metals	Metal Container	Separated and Stored
17 04 11	Cables	Container	Separated and Stored
17 05 04	Soils and Stones	Reception Area	
17 08 02	Gypsum based construction materials	Container	Separated and Stored
17 09 04	Mixed construction and demolition wastes other than those mentioned in 170901, 170902 and 170903	Reception Area	Manual/mechanical sort, followed by trommel, picking station, overband magnet. Residual waste may be shredded.
19 12 12	Other wastes (including mixtures of materials) from mechanical treatment of wastes other than those mentioned in 191211	Reception Area	Manual/mechanical sort, followed by trommel, picking station, overband magnet. Residual waste may be shredded

The entire operational area is concreted. The incoming waste will be deposited within the building. There will be an initial manual/mechanical sort to remove large items such as concrete, wood and metal. Plasterboard will also be removed at this stage. It will be placed into a container. Large cardboard items will also be placed in a separate container.

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The remaining waste will then be transferred into the feed hopper. The waste will continue along a conveyor into the trommel. The trommel extracts fines which will be stored beneath the trommel. The waste will continue into a picking station.

The picking station will be used to remove cardboard, wood, plastic, metals, lights and residual waste. These wastes will be stored in separate bays beneath the picking station. The remaining hardcore continues and will exit into a bay. Bay walls will be constructed from concrete.

The residual waste will be shredded. This enables more efficient transportation of waste to the next authorised facility. The shredding process reduces the waste to 100mm.

Wood may also be shredded on site depending on the quality and requirements of the end user.

All separated wastes, wood, plastic, plasterboard, cardboard and metal will be stored separately for onward processing at authorised facilities.

The process equipment will be provided by CRS<sup>1</sup>, a company that specialises in waste processing equipment. The site has been designed to avoid double handling waste.

The annual permitted throughput of the facility will be 75,000 tonnes.

The process capacity of the trommel/picking station will be 100 tonnes per day.

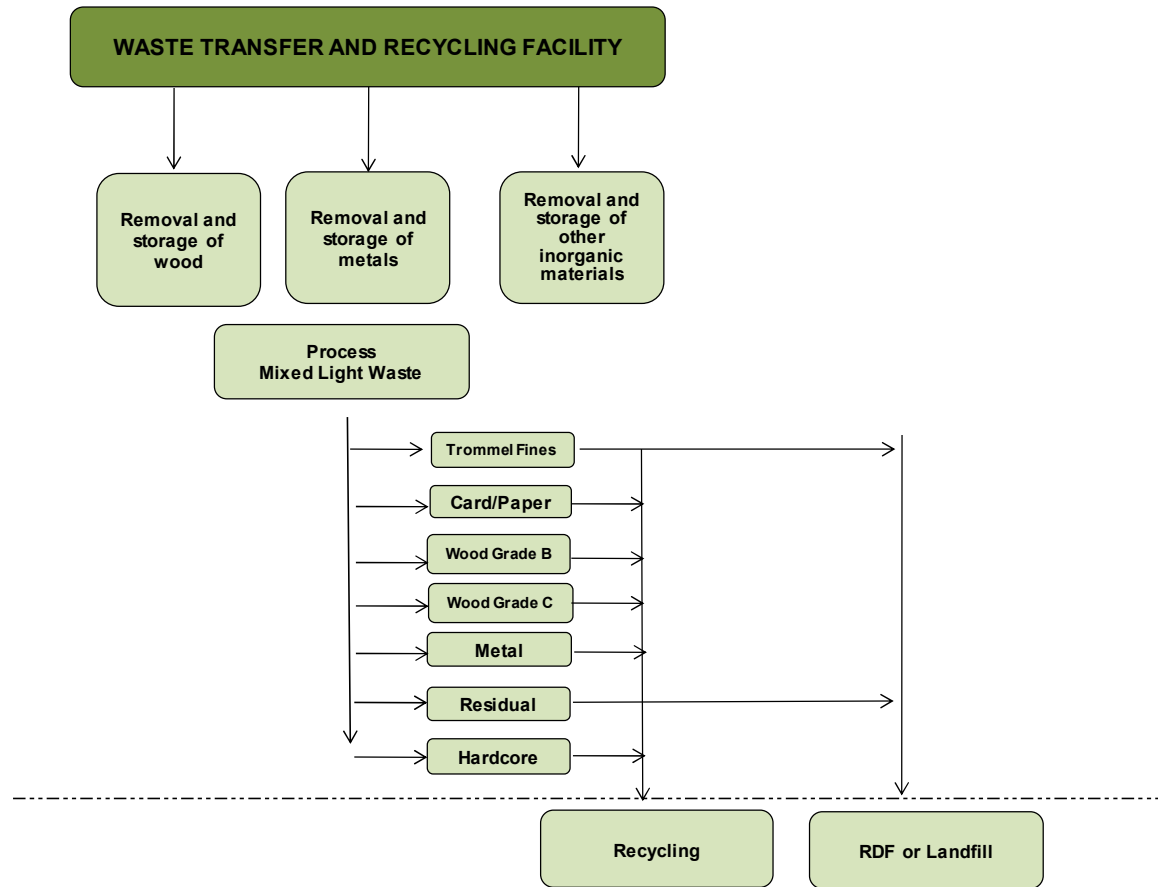
The maximum amount of mixed waste that will be on site at any one time will be 2,000 tonnes.

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<sup>1</sup> <http://www.crsni.co.uk>



Figure 1 – Process Flow Diagram



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### **3. Noise Management**

#### **3.1 Responsibility for Implementation of the plan**

The Technically Competent Manager (TCM) has responsibility for ensuring these procedures are adhered to which includes communication with staff and contractors, and the provision of adequate training.

The Technically Competent Manager is responsible for updating and re-issuing these procedures as necessary and ensuring all staff are trained in new procedures. The TCM will be the main point of contact for ensuring implementation of this plan. In their absence, the Site Supervisor will be responsible for implementation.

All staff will be trained in these procedures. Staff training is set out in EMS-OP-01. All staff will be trained to a standard which enables them to perform their responsibilities. The TCM is responsible for delivering training and maintaining records. Training is reviewed on an annual basis.

A record of staff training will be kept for each staff member which includes inductions to new processes and procedures as needed. EMS-FR-03.

The NMP will be reviewed on an annual basis or sooner if requested by the EA. It will also be updated if the operator changes the operation.

#### **3.2 Sources of Noise Emissions**

The following are potential sources of noise emissions:

- Vehicles entering and/or leaving the site
- Waste unloading
- Loading process plant
- Trommel
- Shredding
- Machinery loading process equipment and vehicles (loading shovel or excavators).

All plant and machinery will be located within the building.

It is also important to identify other potential sources of noise emissions in the locality. These are provided in Table 2.

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**Table 2 Sources of Noise and/or other Emissions**

<b>Company</b>	<b>Address</b>	<b>Type of Business</b>	<b>Distance from site boundary (m)</b>
Former Southall Gas Works Site Redevelopment	The Straight, Southall, UB1 1QX	Major Construction Site	140m North
Conway Site	North Hyde Gardens, Hayes	Construction and Aggregate Washing	230m West
Multiple	International Trading Estate	Several industrial occupants with HGV usage and forklifts, manufacturing, motors, builders' merchants.	Surrounding the site

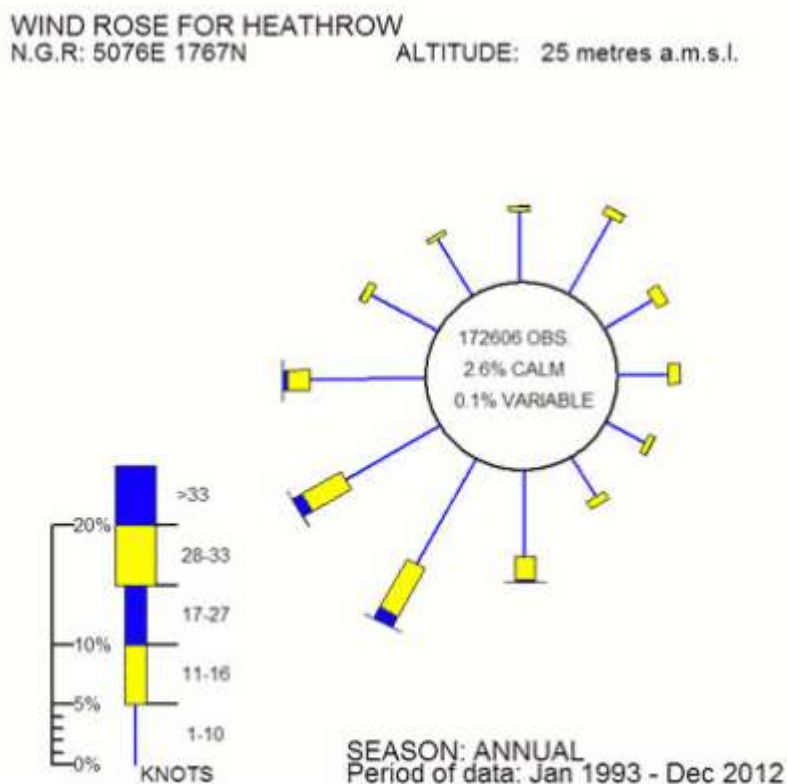
The Conway Site is an externally operated aggregate processing facility. The Former Gas Works site is a major construction project. The other occupants on the estate are enclosed operations with yard storage. Some occupants such as the builders merchants have plant working outside.

The pathway for noise is the atmosphere. With reference to the wind rose for the site, the prevailing wind direction is from the west south west or south west and therefore areas to the east north east or north east of the site are down prevailing wind of the site.

Windrose data has been obtained from the Met Office for Heathrow Airport. Heathrow is located approximately 3km south west of the site.

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**Figure 2 - Wind Rose Data<sup>2</sup>**

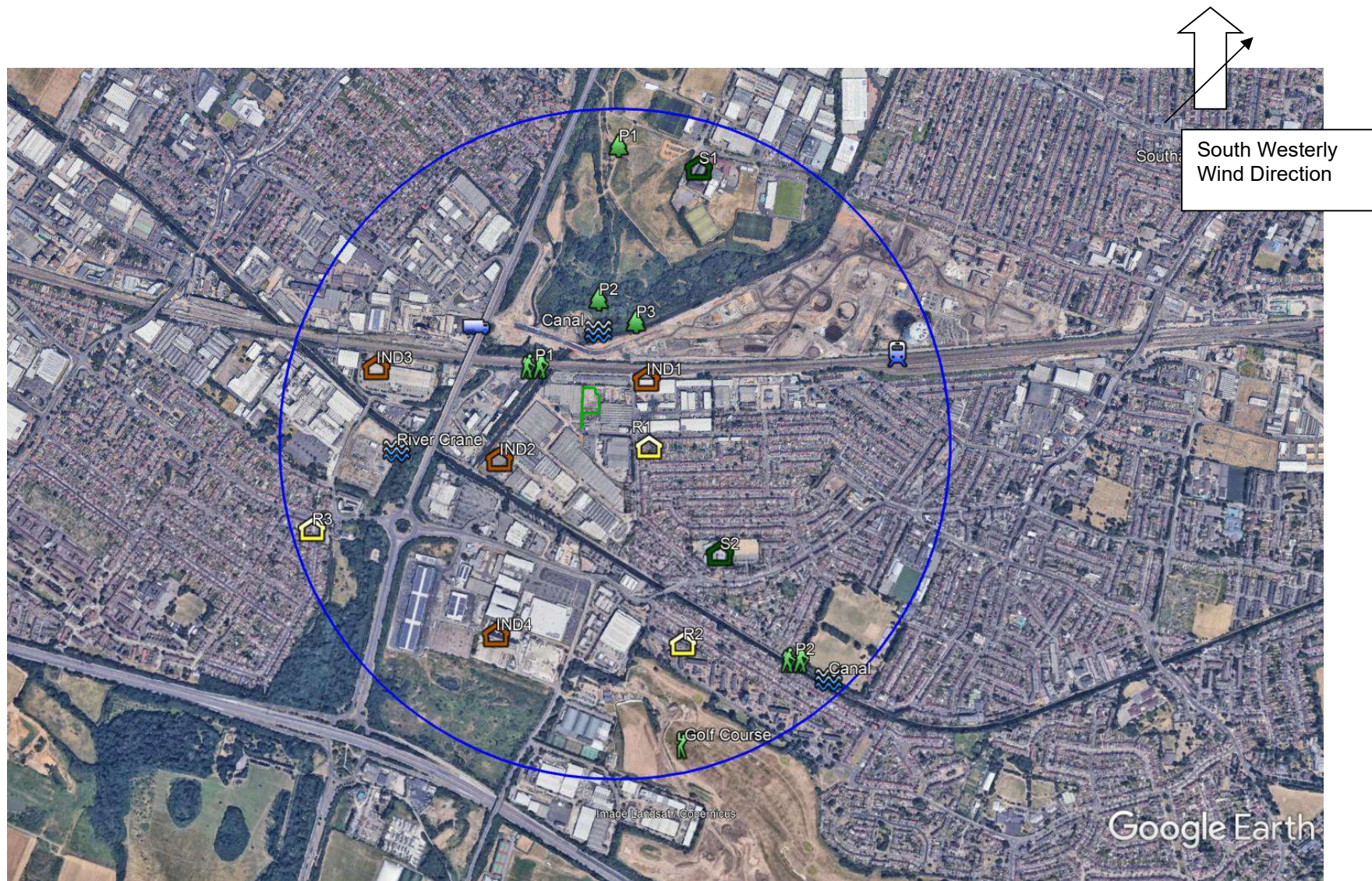


For the purposes of identifying the nearest receptors, a search area of 1km has been used.










Figure 3 shows the site and broad location of the main receptors within 1km. Table 3 provides a description of those receptors and the distance and direction from the site. The distance has been measured from the permit boundary, at the closest point.

<sup>2</sup> <https://www.metoffice.gov.uk/services/transport/aviation/regulated/airfield-climate-stats#Heathrow>

Figure 3 - Site Setting and Receptors



**Table 3 – Receptors**

Receptor	Legend	Type	Sensitivity	Distance and Direction from Permitted site
Industrial Units Johnson Street	IND 1	Industrial/Warehouse	Low	90m East
International Trading Estate (Brent Park Industrial Estate)	IND 2	Industrial/Warehouse	Low	Surrounding
Industrial Units	IND 3	Industrial/Warehouse	Low	400m West
Industrial Units Western International	IND 4	Industrial/Warehouse	Low	400m South
Grand Union Canal		Surface Water	Low	135m West, 100m North West, 120m North
River Crane		Surface Water	Medium	300m West
Canal Path	P1	Footpath	Medium	135m West, 100m North West, 120m North
Canal Path	P2	Footpath	Medium	350m South
Scotts Road/Brent Road	 R1	Residential	High	125m South East
Wentworth Road	 R2	Residential	High	610m South East
N Hyde Road	 R3	Residential	High	800m South West
Guru Nanak Sikh Academy	S1	Education	High	670m north East
Featherstone Primary School	S2	Education	High	530m South East
Minet Country Park	 P1	Recreation	Medium	275m North
Local Wildlife Sites/Deciduous Woodland	 P2	Ecology	Medium	158m North 115m North West
London Canals	 P3	Medium	Medium	135m West 100m North West 120m North
Railway		Railway	Low	50m North
A312		Road	Low	350m West

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Users of the canal are transient receptors; in that they are not permanently based on the canal or using the tow path. The building door opens towards the west, and the canal is located 180m west of the site. However, there is large brick construction warehouse separating the canal from the waste building. Again, there is no direct line of sight between the canal and the waste building. The warehouse building is brick construction along the eastern elevation with no windows facing the waste site.

The proposed waste building is surrounded by warehouses on all sides, except the southern boundary. The land immediately south of the permitted site is used as HGV parking area. Beyond which is another car park before a substantial warehouse, which has a solid brick side along its entire northern boundary. No windows face the waste site.

### 3.3 Assessment

All waste treatment activities will be carried out inside a building. This will minimise the likelihood of noise emissions escaping beyond the site boundary and being transferred to impact a receptor.

The building has been orientated to provide doors on the western elevation. This is away from the nearest residential properties, which are located east of the site.

The building has been designed with one opening which will help to contain noise within the building. The processing equipment will be installed on the far side of the building, furthest from the door. The shredding operation will take place within the confines of the building, away from the door.

The shredder will not be used continuously. This is only used once residual waste has been generated through the process equipment. The process equipment will be operated daily to ensure that waste is continuously processed. The process equipment is switched off during breaks.

The site is open to receive waste between the hours of:

- 07.00-1800 Monday to Friday
- 07.00-13.00 on Saturdays
- With no operations on Sunday or Public Holidays

The following procedures will be implemented to prevent emissions to air from waste handling.

- The building will provide sealed sides and roof. The only opening will be for vehicular access.
- With the building, there will be internal bay walls to store separated wastes.
- The building will be inspected daily to ensure that it remains intact. Any damage will be reported to the Site Management immediately and repairs instigated within 48 hours. The site will have a night guard for security out of hours.
- Speed restriction of 5mph on site

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- All plant and machinery to be checked at the start of each working day. Any defects will be reported to the TCM.
- All vehicles will be switched off when not in use.
- The operator will develop an anti-idling campaign. This will encourage vehicles to switch off engines whilst waiting to unload or be loaded.

Whilst the nearest residential properties are located 120m south east of the site, they are separated from the site by a large industrial warehouse. There is no direct line of sight between the nearest houses and the operational building.

A Noise Impact Assessment has been prepared to assess the potential risk to the nearest residential receptors. The Environment Agency requested the NIA as they believed the risk to receptors was unclear or potentially significant due to the following factors:

- 120m from receptors (residential housing)
- Site operation - external delivery, some storage outside and processing predominantly hard core materials

With regards to the second point, the site is in an industrial estate which permits open storage and generates HGVs movements. Adjoining occupants carry out these activities and therefore external operations are typical on this estate. The site will not predominantly manage hard core materials. Skip waste is mixed and contains plastic, textiles, wood, soils and hardcore. Any skips that contain soils or hardcore only would not be processed through the system.

The NIA is provided as a separate report.

Background noise levels were measured at a position to represent the nearest receptor. The background noise was measured on Friday 11 September 2020 between 0645-0800 and again between 11.24-15.18.

The sound climate was dominated by vehicle movements both local and distant. The background noise in this general area is normally influenced by air traffic using Heathrow Airport. The residential properties are located 3km north east of Heathrow airport. Air travel has been severely disrupted during the coronavirus pandemic. Heathrow Airport closed one of its two runways in July 2020 and it has yet to be reopened. In addition, these residential properties are about 160m from the mainline railway line, which again has seen a reduced capacity. There has also been a general reduced capacity in the road network with more people working from home and some businesses operating at reduced levels.

Therefore, the overall impact has been lower background noise level.

To predict the noise impact from the waste activity at this receptor, actual noise measurements were obtained from the existing operation. This data was inputted to the SoundPLAN 8.2 software which models the noise propagation from the site.

The output from the model predicted noise levels at the nearest residential property to be 52 dBL<sub>aeq,1hr</sub>. Applying a factor to these for the sound insulation of the building, provides a predicted noise level of 49 dBL<sub>aeq,1hr</sub>. A correction factor of +3dB was applied to account for occasional distinctiveness of the operation. The overall assessment



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predicts a noise level of 52 dBL<sub>aeq,1hr</sub>, above a background of 48 dBL<sub>a90,T</sub>, which is a difference of 4dB. This provides an impact finding of Not Adverse.

Applying the other general points about the lower background level and the site location in an industrial estate that has 24/7 operations, the overall impact to the residents is low.

### 3.4 Noise Monitoring

The TCM or site supervisor will walk to Rubastic Road/Brent Road junction daily to check the noise levels. This will be during operational hours when the process equipment is operational. A record of this will be made in the Site Diary together with any observations. Records of other noise activities will be also be made. This will be a hearing check to see if the site operations are audible. No formal monitoring is proposed.

The site diary will also contain details of the various processing operations that take place each day. The site manager will ensure noise management measures are undertaken as appropriate to the site operations and current conditions.

No waste processing will take place outside.

The TCM will be responsible for the operation of the noise management plan and all site operatives will be trained, and required, to take necessary mitigation action. There is also a site supervisor to provide the same level of cover as the TCM. They will also be required to take preventative action to avoid noise checking plant and equipment, reporting any defects, reducing drop heights when loading waste and driving plant and HGVs with due care (avoid throttling). Additionally, any contractors working on site will be made aware of the provisions of noise management and be required to comply with relevant provisions as appropriate to any work they are undertaking on site.

In the event of complaints being received, the complaint procedure will be implemented with form EMS-FR-02.

Weather conditions will be recorded daily in the Site Diary

The site diary will also contain details of the various processing operations that take place each day. The site manager will ensure noise management measures are undertaken as appropriate to the site operations and current conditions. Weather conditions which require specific site actions including cessation of processing plant operations are detailed in the site offices allowing actions to be taken in response to the prevailing weather conditions.

If several substantiated complaints are received over a short period of time, the TCM will seek the advice from a specialist noise consultant to undertake an assessment of the site with a view of identifying the specific source of the noise and implement corrective action.

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## **5. Reporting and Complaints Response**

The Site Manager has the overall responsibility for this procedure.

The administration staff will all be responsible for handling complaints and recording on the correct form. All complaints must be referred to the Site Manager.

In this context, a complaint may be received directly from a resident, customer or from a Regulator.

When the site receives a complaint, a record is summarised in the Site Diary. Full details will be provided on the complaints form, EMS-FR-02, see Appendix A.

All staff based in the office will be trained on recording complaints and to make sure they notify the TCM immediately.

The TCM will review the activities that may have given rise to the complaint. If necessary, the CCTV footage will be reviewed to note any specific operational issues that may have given rise to the source of the complaint.

The Site Manager will report the findings to the complainant and implement appropriate corrective action in accordance with a specific management plan or the Operational Procedures.

### **5.1 Engagement with the Community**

The immediate neighbours will be contacted, and direct dial telephone details provided for the TCM and main officer number. Email contact details will also be provided.

## Appendix A - Complaint Form

Customer Details	
Customer Name -	
Address –	
Postcode -	
Customer Contact Details -	
Tel -	
Email -	
Date -	
Complaint Ref Number -	
Complaint Details -	
Investigation Details	
Investigation carried out by -	
Position -	
Date & time investigation carried out -	
Weather conditions -	
Wind direction and speed -	
Investigation findings -	
Feedback given to Environment Agency and/or local authority -	
Date feedback given -	
Feedback given to public -	
Date feedback given -	
Review and Improve	
Improvements needed to prevent a reoccurrence -	
Proposed date for completion of the improvements -	
Actual date for completion -	
If different insert reason for delay -	
Does the noise management plan need to be updated -	
Date that the noise management plan was updated -	
Closure	
Site manager review date	
Site manager signature to confirm no further action required	

