CellsafeUK Limited
Units 1, 2 & 3 Round Croft,
Field Street,
Willenhall,
West Midlands.
WV13 2NP.

Noise Management Plan (NMP)

Battery Recovery facility at Units 1, 2 & 3 Round Croft, Field Street, Willenhall, West Midlands WV13 2NP.

Provenance

Version	Authorised by	Date
Draft	T. Higgins (Enviroconsult)	16.02.26
Version 1		

Contents

Introduction

CELLSAFEUK Limited operate a battery recycling facility at Units 1, 2 & 3 Round Croft, Field Street, Willenhall, West Midlands WV13 2NP.

The layout for the CellsafeUK facility has been provided and is used to demonstrate acceptability of the site in acoustic terms based on the identified plant and equipment in use.

Site Description

The site is located at within the industrial area of Willenhall approximately equidistant between Walsall (5km east) and Wolverhampton town centres (4.5km west). Units 1, 2 & 3 Round Croft, Field Street, Willenhall, are within an area of formerly heavy industry that has, overtime been converted to commercial and residential land uses leaving 'islands' of industry adjacent to residential land uses. The CellsafeUK site is surrounded on all sides by other industrial uses to the east, and south, commercial uses to the north and derelict land/Residential uses to the west. The site occupies a slightly elevated position in respect of land to the south and east.

The nearest sensitive residential property (Round Croft) is located to the northeast and is 60m from the building within which the proposed facility will operate. Residential uses on Gomer Street and Field Street (to the southwest are slightly closer 40m – 65m but are screened from the activity by the main building and there is no intention to access the facility from that elevation (doors are intended to remain closed/access blocked). Figure 1 below provides an indicative illustration of the site.

Figure 1 Google Image showing site location and relative position of NSRs

Courtesy of Google Earth Image (2026).

Site

MP*

Noise Monitoring points

The site comprises 3,600 m² of land with approximately 1,600 m² of large modern industrial units separated into 5 industrial bays with an area of concrete hardstanding to the front and rear of the building.

The buildings are of modern construction with brick and blockwork walls with steel frame roof and wall structures and double skin insulated modern roof construction.

CELLSAFEUK Activities and Layout

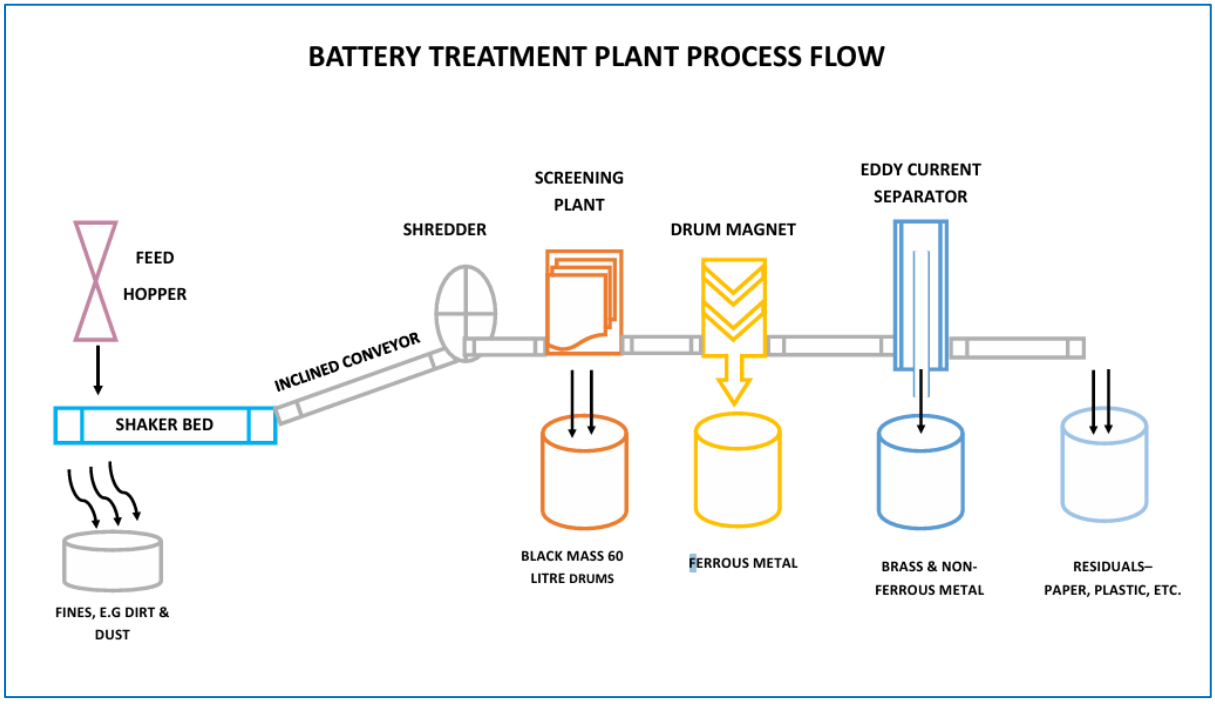
The CellsafeUK facility provides a specialised recovery activity for batteries.

CellsafeUK Limited accept non-hazardous batteries only, i.e. AA and AAA alkaline batteries, for the recovery of recyclable components such as black mass, ferrous metal, brass pins and other non-ferrous metals. The Site will not accept any other types of batteries, and therefore excludes Lithium, Li Ion, lead acid or other hazardous batteries.

The application made is to process up to 3,120 tonnes of non-hazardous alkaline batteries per annum.

Figure 2 below provides a schematic of the intended process flow:

Figure 2 Process flow schematic



The Site treats up to 10 tonnes per day of wastes for recovery and is classed as a Waste Operation under Schedule 9 of the Environmental Permitting (England and Wales) Regulations 2016.

Although the Site only accept batteries classed as non-hazardous, the Environment Agency stated during enhanced pre-application consultations on 19 December 2025 that:

> *"When non-hazardous batteries are treated – and in this case shredded – it changes the nature of the waste and creates hazardous waste. The content of batteries 'black mass' is hazardous due to the metals and chemistry of the materials, so where batteries are not hazardous pre-shredding, we do need to consider any subsequent treatment of the shredded battery material."*

Therefore, materials separated downstream of the shredder are not mixed and are stored separately from one another. Non-hazardous and hazardous wastes are not mixed at the site, and the plant is designed to separate these materials as part of the processing.

Alkaline batteries are subject to detailed pre-acceptance and acceptance procedures, including visual inspection as part of the waste acceptance criteria. Acceptable and permitted loads are loaded and stored in a series of fireproof concrete bays located inside the Goods Inwards building. Following unloading and storage in the Goods Inward building, batteries will be processed as follows:

- Materials will be transferred by forklift truck from the 'Goods Inward' building to the Picking Station building, where materials will be unloaded into a reception hopper, which feeds a conveyor and picking station. All batteries will pass along the conveyor. Site operatives will be positioned either side and will visually inspect each battery. Any non-conforming batteries will be manually removed and stored in a quarantine skip for removal from site to an authorised facility.
- Acceptable batteries will be discharged from the end of the conveyor and stored in palletised containers, which will be transferred by forklift truck to the Processing building.
- Inside the Processing building, batteries will be fed into a feed hopper and onto a shaker bed, where any dirt or other fine material will be 'shaken off' and captured in a sealed container located below. Clean batteries will then transfer up an inclined conveyor to a shredding plant, where they will be shredded and screened, with 'black mass' material captured in sealed 60 litre containers.
- Remaining material will transfer via conveyor to a drum magnet for ferrous metal separation into a sealed container of between 0.6m^3 and 1.2m^3 capacity, before passing to an eddy current separator for capture of brass pins and any other non-ferrous metal. Remaining residual materials such as paper, card, plastic etc will be stored in a sealed container.
- Separated materials will be transferred to the Goods Out building, where they will be stored in a series of fireproof concrete bays pending their removal from the site to authorised off-site facilities. Shredded materials that are hazardous waste will be kept separate and not mixed with non-hazardous waste.

All incoming wastes will be stored and processed inside the buildings. Non-hazardous and hazardous waste will be stored separately. Black mass will be stored in sealed and lidded 60 litre containers. Lids will be kept closed except when black mass is being loaded into the container.

Vehicle movements for the delivery and collection of waste are considered separately as an external model. Whilst a delivery (or collection) will probably take place whilst plant is operating, it is unlikely that this will occur for more than 20-30 minutes and will affect only the goods in and picking station buildings the impact is considered negligible. The key noise source is the processing plant identified below.

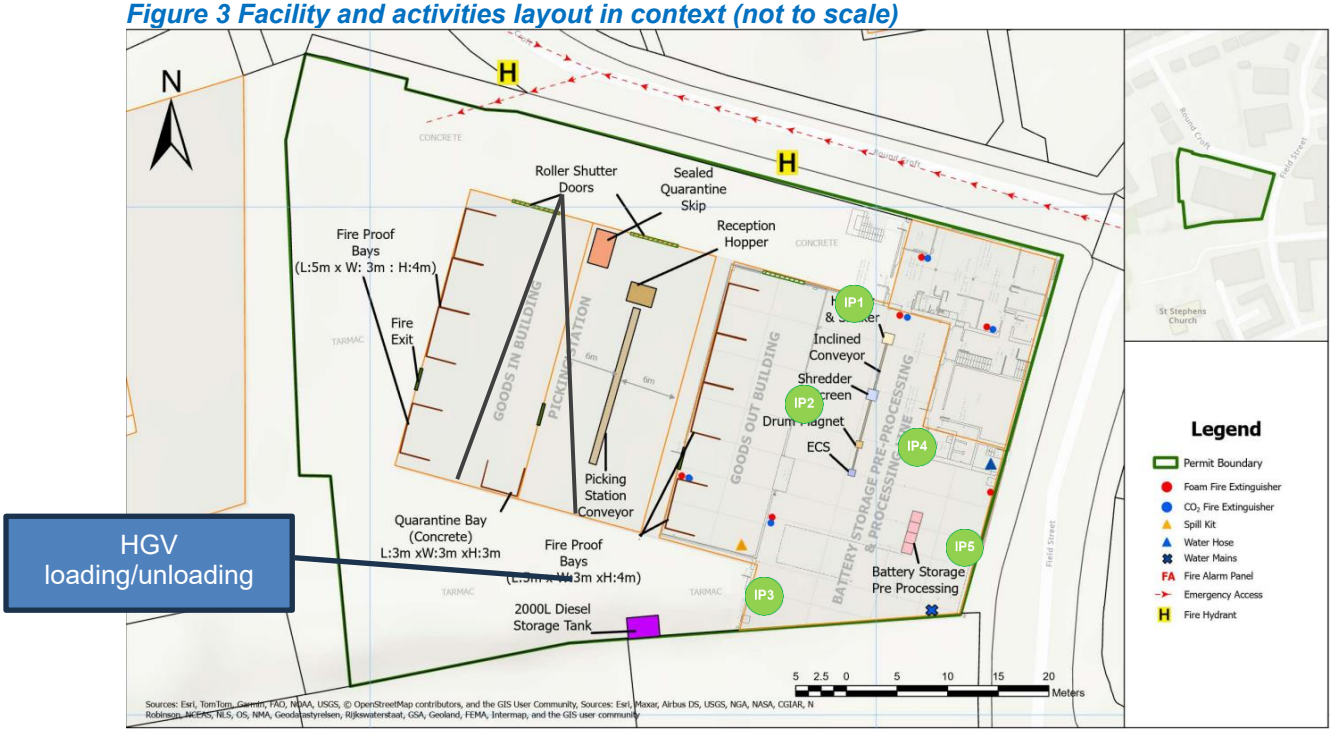
External Activities & Vehicle Movements

- Pallet delivery (on pallets) HGV/LGV deliveries to site, typically < 50 tonnes/week. 1-2 HGV loads per week.
- Bulk container or skip exchange for recycled materials. 1-2 HGV/LGV/week.
- Waste black mass removal assumed by HGV once every 2-3 weeks.
- Jungheinrich (or similar) FLT assisting with or unloading of delivery (approximately 15mins in any 1 hour during deliveries).

Internal Activities

- Stock movement using one or of Jungheinrich (or similar) FLT's operating approximately 25% of the time
- Operation of key plant:
    - Loading hopper
    - Vibrating tables
    - Discharge feeders
    - Fragmetiser/granulator
    - Conveyor system

Figure 3 Facility and activities layout in context (not to scale)



Noise Management Plan

The receptor impact assessment is outlined in the Enviroconsult Limited impact assessment reference 524/CELLSAFE(NIAA) concludes that the impact of the facility is not significant in respect of noise generated by the facility affecting nearby sensitive receptors subject to ensuring that doors are kept closed and that access is managed to the operational parts of the facility.

Environmental Permitting legislation demands a general due diligence requirement to prevent the release of emitted pollutants (including noise and vibration) or reduce to a minimum within each permitted installation.

The normal process for demonstrating that controls are in place is to devise and implement a noise management plan and ensure the measures identified are in place, and physical infrastructure for those control measures is maintained. The control measures and physical infrastructure for the CELLSAFE facility are listed below and constitute the noise management controls for the entire site.

These control are subject to review and change as may be necessary to ensure compliance, and will be reviewed if complaints are made.

Physical infrastructure

Building Enclosure

The building structures are robust. The construction is capable of containing noise within the main process buildings. The plant has been located in the easternmost part of the facility so that;

Compliance	
Building integrity check	
Annual Visual building integrity check	
Access doors kept closed	

(i) The plant is physically located as far from the main residential areas to the west as is possible.

(ii) The plant is located in the most structurally robust part of the site, (with significant brick/block walls and dual skin insulated profile cladding.

(iii) The plant building is physically connected to the office block so that the office structure provides a barrier to emission of sound to the north east, and the location of the plant is proximate to offices should management controls need to be implemented quickly.

All the process activities are located within the buildings. Storage of batteries, picking and sorting are carried out in Bays 1, 2 and 3 whilst processing is carried out in bay 4 under controlled conditions.

The building effectively contains most noise generated within it. Noisy activities inside the building are prominent only when doors are opened.

All processing of waste to be carried out only with doors closed.

Demonstrating Compliance

An integrity check on the condition of the building fabric is to be carried out every 4 years to ensure that the building structure is intact. The integrity check should include replacement of any defective panels.

A visual inspection of building integrity to be conducted every year.

Any necessary works to repair damage to the building fabric are arranged within as soon as possible.

Maintenance and report of road/yard surfaces

Roadways and yard areas both inside the building and on the front and rear storage areas comprise concrete delivery apron within the site boundary. This should be maintained in good repair to avoid excessive vehicle or machinery noise from clanks or bangs when traversing the areas.

Any delivery activities carried out on unmade or damaged roadways should be conducted when such locations are in good repair.

Site roads/surfaces should be maintained in a state of good repair to reduce any noise from the passage of vehicles.

Compliance	
Activities within designated areas	
Routine checks on roadways and yard areas (1/month)	
Repairs to road or yard areas recorded.	

Demonstrating Compliance

Activities identified as noisy should be carried out in designated areas as indicated on the site management plan. Records should be retained to positively demonstrate that surfaces are checked, repair records should be kept demonstrating maintenance of surfaces and compliance with the NMP.

Maintenance of plant and equipment

The site uses plant and equipment, most of the primary picking and sorting tasks are manual and require only the use of manual hand tools, or the forklift truck to move materials.

The significant plants identified onsite are:

- Hopper and Conveyor systems in the sorting area
- Hopper, vibratory shaker bed, Untha Shredder, vibrating screen, eddy current separator

Compliance	
Routine maintenance of plant/equipment	
Records of maintenance of key plant	

The only other plant in regular use are Jungheinrich Forklift trucks.

All plant and equipment is to be checked before use to ensure operation is within normal specifications prior to use. Vehicular plants are checked to ensure silencers are working normally, other plants are maintained in accordance with the manufacturer's instructions to ensure proper use.

Demonstrating Compliance

A maintenance plan schedule should be prepared for key noisy plant.

Plant maintenance records should be kept.

Records should be kept of incidents of plant failure/noise and the corrective action taken to demonstrate compliance with the NMP.

Control Measures Management Plan

The following measures are management controls intended to minimise potential noise impacts;

Deliveries/vehicle movements

Deliveries of goods to, as far as practicable, occur only during the normal working day 08.00hrs – 18.00 hrs.

Whilst hours are not restricted by planning consent, custom and practice would be to ensure no significant deliveries, or import/export of wastes are carried out outside the normal hours, as listed.

Additionally external vehicle movements, as far as practicable to occur only during the normal working day.

Compliance	
Hours of delivery/vehicle use	
Vehicle maintenance	
Vehicle silencers	
Reversing alarms	

(Un)loading of waste and import/export of wastes from the site should be carried out in accordance with good practice to avoid excessive waiting times with engines on tick over, avoid engine revving and excessive reversing, and avoid double handling of containers, pallets of other materials to reduce the duration of deliveries.

The relatively low quantities of waste deliveries are anticipated to be relatively infrequent 1/2 per week, and/or smaller vehicles as opposed to HGV's.

Demonstrating Compliance

All vehicle used on the site will be routinely maintained, have appropriate silencers, and, where possible use broadband reversing alarms to prevent excessive disturbance.

Any malfunctions observed in third party delivery vehicles to be reported to the driver immediately. All internal vehicles to be maintained in accordance with the manufacturer's instructions.

Any visiting vehicles with excessive noise noted shall be reported to the driver immediately and to the company supplying the vehicle.

Staff Training

All operator staff receive training on environmental noise awareness. Operators responsible for the operation of vehicles or equipment, have been provided with basic noise awareness training, and are trained to understand and minimise the extent of the acoustic impact of those activities. In summary this means staff are instructed to:

- Ensure activities are carried out in designated areas,
- Ensure all machinery is used as directed and in accordance with good practice,
- Understand the key requirements to minimise triggers for excessive noise based operation of the process,
- Understand the need for keeping appropriate records and recording/reporting of abnormal events,
- Understand the complaints procedure and the need for good community liaison in the event of complaint,
- Ensure cooperation with any investigation into a complaint,
- Understand basic noise awareness and control principles.

compliance	
Staff awareness training	
Reporting of abnormal events	
Compliance with operational time limits	
Recording of information requested	
Complaints procedure	

Demonstrating BAT

All operator staff will are trained in noise awareness.

All records associated with abnormal events should be recorded.

All staff to be made aware of the complaint process and their role within any investigation.

Basic Noise awareness

Basic noise awareness as it applies to Operator staff and comprises the following items:

- Instructing staff in the operation and use of the tools needed for each task,
- Ensuring that activities take place only in designated areas preferably inside buildings,
- Ensuring that noisy activities are undertaken during the day as far as reasonably possible and ideally not before 7am,
- Ensuring that staff are aware of the need to identify any problems and report those as necessary,
- Ensuring that staff keep appropriate records.

Staff are provided with on-the-job training and familiarisation as necessary to ensure compliance with basic noise awareness.

Complaints procedure

Any noise complaints received are logged, recorded and retained for inspection in a complaint log. The details of the complaint must include:

- Time and date of notification,
- Name of complainant,
- Address of complainant,
- Nature of incident (identifying equipment or machines or people if possible),
- Time incident occurred.

BPM compliance	
Complaint procedure	
Investigations process	
Community liaison	
Recording of information requested	

The complaint log should be completed by the individual receiving the complaint and then immediately brought to the attention of the operator.

The operator (or any person delegated by him – for example environmental consultant) will then investigate the incident(s) leading to the complaint. The outcome of the investigation shall be recorded by the operator in the complaint log, along with any measures taken to reduce or eliminate the noise. The complainant shall then be notified of the outcome of the complaint.

If a complainant is not satisfied with the outcome of the investigation, the operator should advise the complainant of what further measures are to be taken. If no other measures are possible or appropriate, the operator should advise the complainant of their right to make a formal complaint to the regulator.

There will be circumstances where no immediate mitigation measures are possible. In such cases the site operator will record the reasons for this and ensure that all noisy activities are kept to an absolute minimum.

Demonstrating BAT

A formal written complaint procedure is maintained.

All complaints (or notifications from staff of events) to be investigated and actioned, as necessary.

At the conclusion of any investigation, all complainants to be notified of the outcome of the investigation as soon as is practicable.

All information to be recorded.

Community Liaison

At the request of the regulator or following justified complaint, the operator will engage in community liaison meetings as may be required. The value of good community relations is considered paramount and a good standard of communication between the operator and potentially affected parts of the community is considered necessary if site-based activities become noticeable in the community.

Formal noise monitoring and compliance

Formal noise monitoring and assessment could be carried out periodically if required by the Regulator, however, the control measures outlined in this NMP are designed to ensure that subjective assessment alone should be sufficient to demonstrate compliance.

Quantitative noise assessment will be performed if required (e.g. in response to complaints).

It is not considered necessary to carry out routine quantitative noise monitoring, as the level of impact has been determined to be manageable using the controls identified above.

All complaints, major noise impacts and incidents received or detected are recorded on the event log. Details of these incidents and complaint are available for inspection at any time by the regulator.

Any detailed logs can be analysed and used to detect common failure points that will, in turn, be used to update management or control measures, as necessary.