Noise Emissions Management Plan

Prepared on Behalf of:

Luton Metal Recycling Limited

The Railway Arches

Colindeep Lane

Colindale

NW9 6HD

Environmental Permit:

YP3691NW

DOCUMENT CONTROL SHEET

Site:	**Luton Metal Recycling Limited**
Project:	**Bespoke Permit Application**
Title	**Noise Emissions Management Plan**
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1. Introduction

1.1 Reasons for a Noise Emissions Management Plan

1.1.1 This Noise Emissions Management Plan has been produced on behalf of Luton Metal Recycling Limited (the operator), in line with current Environment Agency guidance, 'Risk Assessment for your Environmental Permit' available on Gov.uk & the Noise & Vibration Management: Environment Permits Guidance in support of a Bespoke Permit Application.

1.1.2 This Noise Emissions Management Plan has been produced in response to a request from the Environment Agency.

1.1.3 Reference has been made to the following documents:

- *Control and monitor emission of your environment Permit (May 2021) Environment Agency.*
- *Noise & Vibration Management: Environmental Permits (January 2022).*
- *Environment Agency Horizontal Guidance H3 for Noise Part 2-Noise Assessment & Control*

1.2 Noise Impact Assessment

1.2.1 A Noise Impact Assessment has been deemed necessary for determination of the application, but a Noise Emissions Management Plan has been requested to demonstrate how the site will manage potential noise emissions.

1.3 Objectives of this Noise Emissions Management Plan

1.3.1 This Noise Emissions Management Plan demonstrates appropriate measures (practices/procedures/infrastructure) to minimise the release of Noise Emissions from the current operation.

1.3.2 To achieve these objectives, this Noise Emissions Management Plan includes a risk assessment and then identifies the following:

- Controls in place to prevent the generation of Noise;
- Measures in place to control Noise emission should they arise;
- Ongoing monitoring to assess effectiveness of these controls; and
- Measures to monitor conditions onsite and the locality on a preventative basis.

1.3.3 All staff members will be trained on the requirements of this Noise Emissions Management Plan by a Responsible Person (i.e., the TCM) with refresher training completed as required to ensure sufficient understanding of the requirements and everyone will have ready access to this Management Plan.

1.3.4 This Noise Emissions Management Plan will be stored within the Site office in hard copy as well as a digital copy being contained on the Computer System (any authorised person can gain access the document).

1.3.5 The TCM is Responsible for the implementation of this Document.

2. Site Setting

2.1 Location

2.1.1 The site is located within an isolated setting, with numerous commercial, industrial activities being undertaken within the wider industrial/commercial area.

2.2 Designated Environmentally Sensitive Sites

2.2.1 There are no European Designated Sites such as Ramsar, Protection Areas, Biosphere Reserve, Special Areas of Conservations and Local Nature Reserves within 1000 metres of the site. However, the Inner Brent Reservoir SSSI is within 1000 metres (900 metres) of the site. Furthermore, the site is within AQMA designations for PM10 & NO2 as evidenced in Figure 2 overleaf.

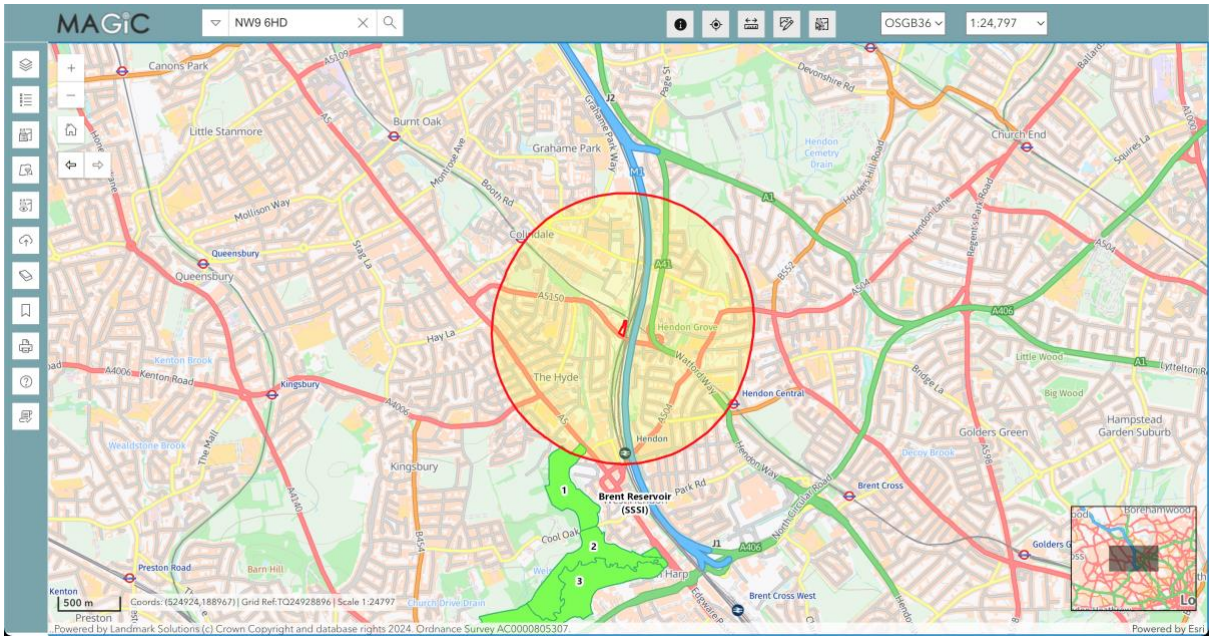


Figure 1: Map Showing Proposed Application Site & 1000 Metre Screening Buffer (Magic Interactive Tool)

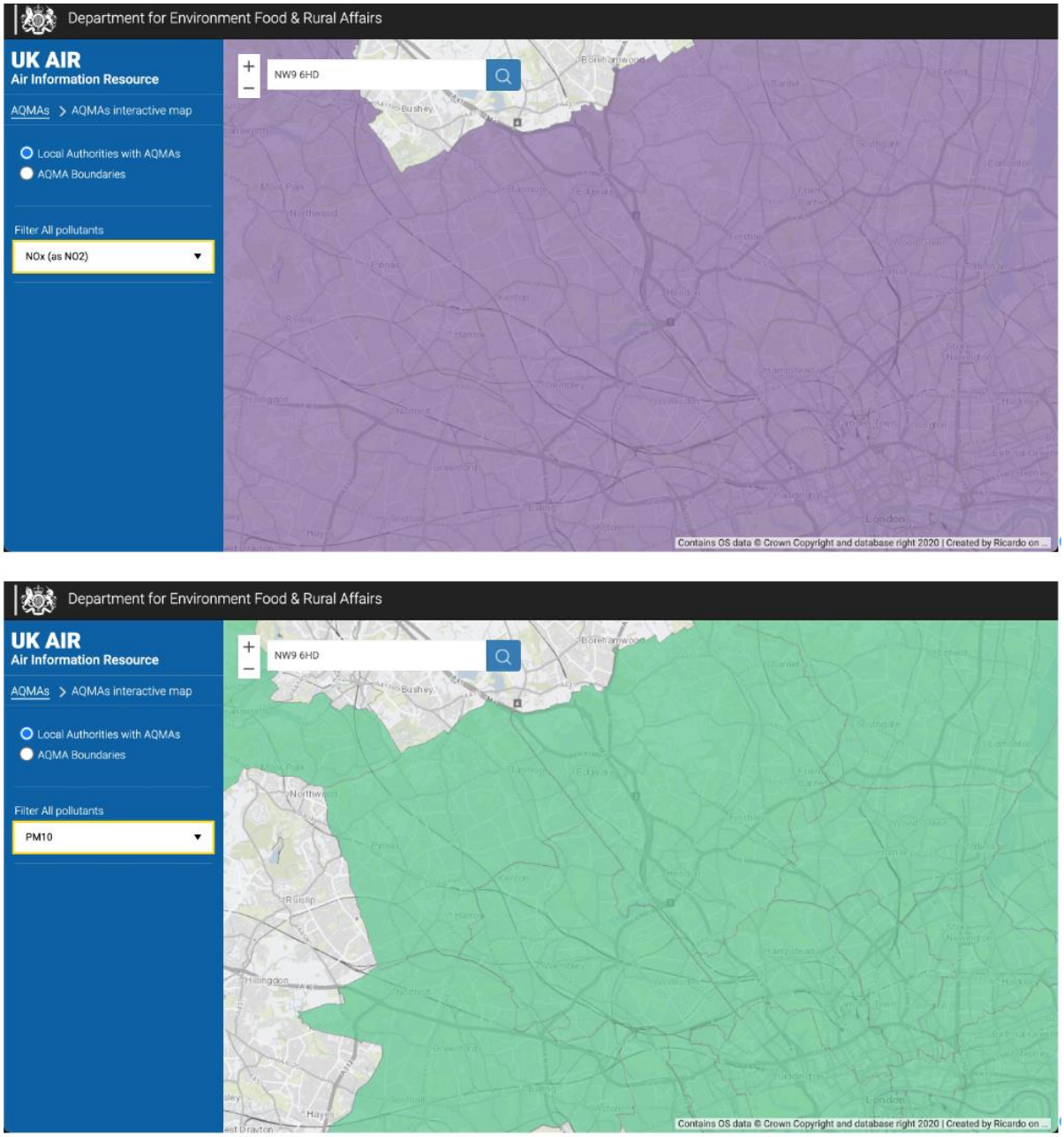


Figure 2: Application Site in Relation to Air Quality Management Designations.

2.3 Potential Local Receptors

2.3.1 A screening exercise has been undertaken to identify possible receptors within a 1000-metre buffer zone of the site.

2.3.2 Possible receptors are indicated in Figure 1 and listed in Table 1 below:

Table 1: Possible Receptors, Distance & Direction from Proposed Operation

Receptor Reference	Receptor Description	Approximate Distance From Site Boundary (Metres)	Direction
A	M1 Motorway	50	East
B	Watford Way Road Infrastructure	208	East
C	River Brent	344	Southwest
D	Sunny Fields Primary School	536	Northeast
E	Middlesex University	652	Northeast
F	Commercial/Industrial Activities	385	Northwest
G	Commercial/Industrial Activities	771	Southwest
H	Colindale Primary School	551	West
I	Residential	562	Southeast
J	Residential	779	Southeast
K	Residential	898	East
L	Commercial/Industrial Activities	816	North
M	Barnet & Southgate College	941	Northwest
N	Colindeep Lane Road Infrastructure	554	Northwest
O	Railway Network	94	South
P	Hendon Train Station	941	South
Q	Brent Reservoir SSSI	900	Southwest
R	Residential	744	Northeast
S	Residential	100	Southwest
T	Commercial/Industrial Activities	25	West
U	Commercial/Industrial Activities	69	Southwest
V	Grammar School	162	Northwest
W	Rushgate Paradise Playground	275	West

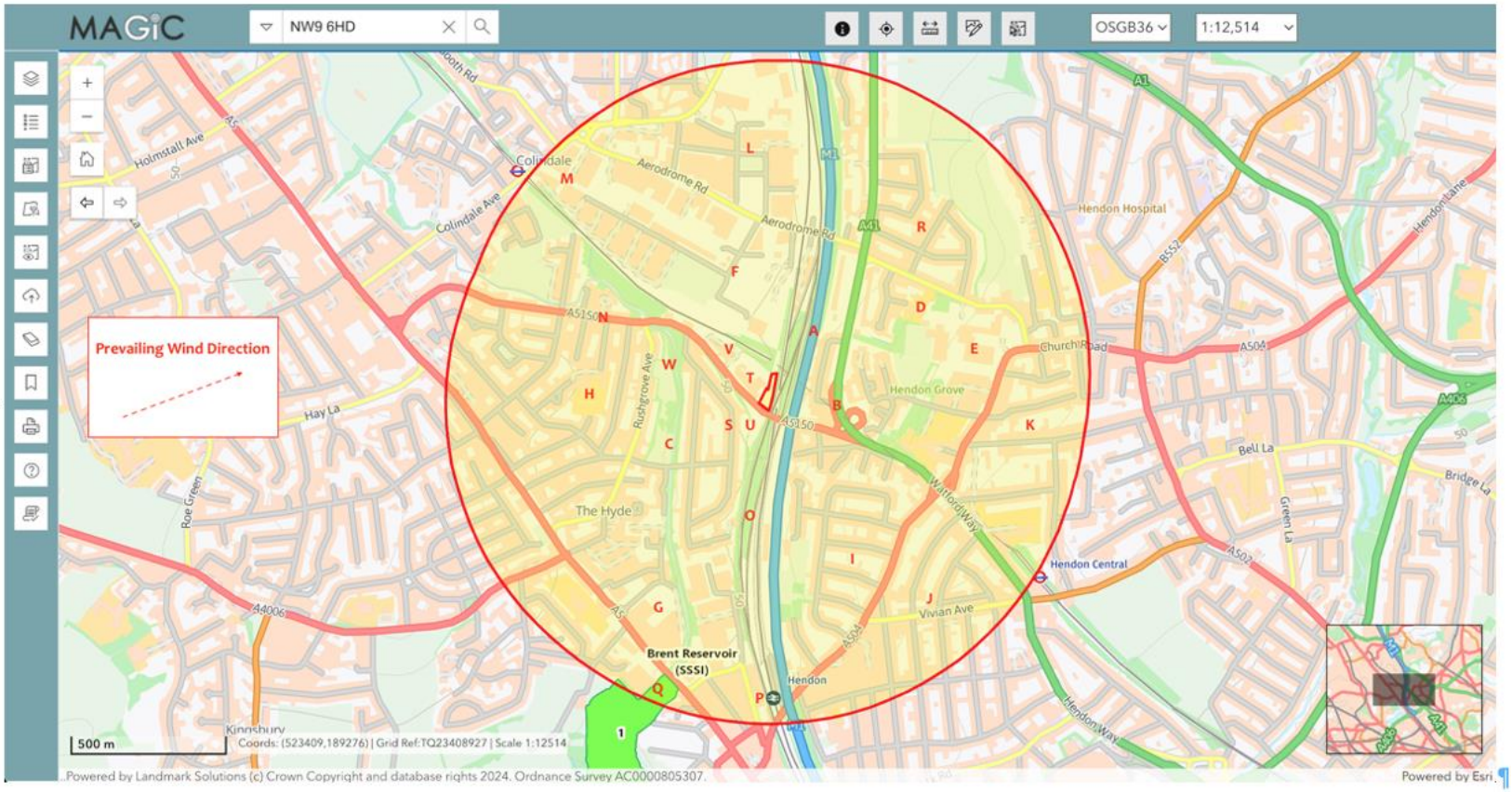


Figure 3: Possible Receptors Identified within 1000m of the Application Site (Magic)

3. Noise Risk Assessment

3.1.1 This Noise Emissions Management Plan is underpinned by a Risk Assessment, which has identified the following operations as having the potential to give risk to Noise emissions and is detailed below:

1. Delivery of Waste Material
2. Deposit of Waste Material;
3. Handling of Waste Material;
4. Processing of Waste Material;
5. Loading of Materials

3.2 Sources, Pathways, Receptors, Risk Management Measures & Controls

Hazard	Source	Pathway	Receptor	Probability of Exposure	Consequence	Magnitude of Risk	Risk Management	Residual Risk
Noise & Vibrations from Vehicle Movements & onsite activities	Noise from Site Operation	Noise through the air and vibration through the ground	Local Human Population, Adjacent Industrial/ Commercial Activities Workforce & Sensitive Receptors as identified in Table 2 above.	Low	Medium	Medium	No engine idling is permitted onsite; all engines are turned off whilst waiting to tip. Relevant plant and equipment will be fitted with appropriate sound attenuation and acoustic isolation and will be subject to regular inspection and maintenance schedules to maintain operational performance. Noise emissions are not considered to be a potential issue due to the isolated nature of the operation. Any plant vibration issue will be resolved during the plant-commissioning period. See separately submitted Environmental Management System (Noise Emissions Management Procedures). Operatives are trained in noise management and the prompt reporting of any abnormal noise so that it can be rectified.	Very Low
	Noise from Delivery of Wastes (i.e., Vehicle Movements)	Noise through the air and vibration through the ground	Local Human Population, Adjacent Industrial/ Commercial Activities Workforce & Sensitive Receptors as	Low	Medium	Medium	All vehicles have silencing equipment fitted as standard, which are regularly serviced and have daily defect checks completed by drivers. Noise emissions are not considered to be a potential issue due to the isolated nature of the operation.	Very Low

			identified in Table 2 above.				As required by law, in order to hold an Operator's License, all vehicles undergo a safety inspection, including exhaust and silencer check, every 6 weeks (PMI). Vehicles are fitted with working exhaust silencing equipment. 10mph speed limit enforced onsite; anyone speeding will be subject to disciplinary action. No engine idling is permitted onsite; all engines are turned off whilst waiting to tip. Relevant plant and equipment will be fitted with appropriate sound attenuation and acoustic isolation and will be subject to regular inspection and maintenance schedules to maintain operational performance. Any plant vibration issue will be resolved during the plant-commissioning period. See separately submitted Environmental Management System (Noise Emissions Management Procedures). Operatives are trained in noise management and the prompt reporting of any abnormal noise so that it can be rectified.	
	Noise from Deposit of Wastes	Noise through the air and vibration through the ground	Local Human Population, Adjacent Industrial/ Commercial Activities Workforce & Sensitive	Low	Medium	Medium	All vehicles have silencing equipment fitted as standard, which are regularly serviced and have daily defect checks completed by drivers. Noise emissions are not considered to be a potential issue due to the isolated nature of the operation.	Very Low

			Receptors as identified in Table 2 above.				As required by law, in order to hold an Operator's License, all vehicles undergo a safety inspection, including exhaust and silencer check, every 6 weeks (PMI). Vehicles are fitted with working exhaust silencing equipment. 10mph speed limit enforced onsite; anyone speeding will be subject to disciplinary action. All transport arrangements managed by the transport manager and only one vehicle will unload in an area at a time. The site perimeter benefits from an enclosed site perimeter acting as physical barriers (specific sections). No engine idling is permitted onsite; all engines are turned off whilst waiting to tip. Relevant plant and equipment will be fitted with appropriate sound attenuation and acoustic isolation and will be subject to regular inspection and maintenance schedules to maintain operational performance. Any plant vibration issue will be resolved during the plant-commissioning period. See Noise Emissions Management Procedures. Wind conditions will be monitored & Operations may cease until conditions improve. Operatives are trained in noise management and the prompt reporting of	

							any abnormal noise so that it can be rectified.	
	Noise from Processing of Wastes	Noise through the air and vibration through the ground	Local Human Population, Adjacent Industrial/ Commercial Activities Workforce & Sensitive Receptors as identified in Table 2 above.	Low	Medium	Medium	Processing of materials conducted within the confines of the site perimeter. Noise emissions are not considered to be a potential issue due to the isolated nature of the operation. All Equipment/Machinery have daily defect checks completed by operators, with all defects reported to senior management for rectification. Relevant plant and equipment will be fitted with appropriate sound attenuation and acoustic isolation and will be subject to regular inspection and maintenance schedules to maintain operational performance. Any plant vibration issue will be resolved during the plant-commissioning period. See Noise Emissions Management Procedures. Operatives are trained in noise management and the prompt reporting of any abnormal noise so that it can be rectified.	Very Low
	Noise from Loading of Wastes	Noise through the air and vibration through the ground	Local Human Population, Adjacent Industrial/ Commercial Activities Workforce & Sensitive	Low	Medium	Medium	Loading of materials conducted within the confines of the site perimeter benefitting from an enclosed site perimeter (specific sections) acting as physical barriers. Noise emissions are not considered to be a potential issue due to the isolated nature of	Very Low

			Receptors as identified in Table 2 above.				the operation. Materials are placed within removal vehicles and not dropped from a height. Reducing the potential impact of noise & vibration. Revving of grabs/wheeled loaders engines when loading will be kept to a minimum. Walkie-talkie communication will be kept to a low volume. When not in use all operational equipment is switched off not left idling. See Noise Emissions Management Procedures. Wind conditions will be monitored. Operatives are trained in noise management and the prompt reporting of any abnormal noise so that it can be rectified.	

4. Noise Control of Impacts

Table 2: Control of Noise Impacts

Abatement Measures	Description/Effect	Overall Consideration & Implementation
Site/Process Layout in Relation to Receptors	Operations are conducted within the areas benefitting from acoustic barriers.	• Normal Hours of the site 7.30am-17:00pm Monday-Friday and 07:30am-13:00 pm Saturdays. • Operational areas benefit from boundary containment fencing/walls/buildings acting as a physical barrier to transmission noise & vibration.
Hours of Operation	No night-time working hours, operations only take place during daytime working hours.	• Normal Hours of the site 7.30am-17:00pm Monday-Friday and 07:30am-13:00 pm Saturdays. • Engine Idling Policy Implemented across the Depot. • Operational areas benefit from boundary containment fencing/walls/buildings acting as a physical barrier to transmission noise & vibration.
Reversing Alarms	Broadband reverse alarms/Peaks in noise emissions	• Normal Hours of the site 7.30am-17:00pm Monday-Friday and 07:30am-13:00 pm Saturdays. • Operational areas benefit from boundary containment fencing/walls/buildings acting as a physical barrier to transmission noise & vibration. • Engine Idling Policy Implemented across the Depot (training provided to all drivers/workers) • Reversing is kept to a minimum (where practical to achieve). • 10mph speed limit enforced onsite.
Operation & Maintenance of Plant and Machinery	Poorly maintained and operated machinery has the potential to increase noise emissions	• Normal Hours of the site 7.30am-17:00pm Monday-Friday and 07:30am-13:00 pm Saturdays. • Operational areas benefit from boundary containment fencing/walls/buildings acting as a physical barrier to transmission noise & vibration. • Operatives are trained in the prompt reporting of any abnormal noise so that it can be rectified. • All Equipment/Machinery have daily defect checks completed by operators, with all defects reported to senior management for rectification. • Materials are placed within removal vehicles and not dropped from a height. Reducing the potential impact of Noise. • Revving of engines when loading will be kept to a minimum. • Engine Idling Policy Implemented across the Depot (training provided) • Relevant plant and equipment will be fitted with appropriate sound attenuation and acoustic isolation and will be subject to regular inspection and maintenance schedules to maintain operational performance. • Effective and regular maintenance of plant.

Access Road Use and Maintenance	Limiting noise generated within the site	• Normal Hours of the site 7.30am-17:00pm Monday-Friday and 07:30am-13:00 pm Saturdays. • Operational areas benefit from boundary containment fencing/walls/buildings acting as a physical barrier to transmission noise & vibration. • Engine Idling Policy Implemented across the Depot (training provided to all drivers/workers) • 10mph speed limit enforced onsite; anyone speeding will be subject to disciplinary action.

4.1 Maintenance Arrangements

4.1.1 Operatives complete daily visual inspections of all equipment prior to the equipment being put into use, with all defects being raised to the Site Manager or TCM in the first instance for the repair to be scheduled and completed. All defects raised with logged on internal company documentation as well as a copy of the worksheet for the maintenance work once it has been completed. Maintenance works will be scheduled as soon as possible and if necessary, equipment will be taken out of use if not suitable for use, which will be the decision of the Site Manager/TCM.

4.2 Noise Control Measures

4.2.1 The site will operate on the basis that the reduction/limitation of Noise emissions in the first instance are more effective than implementing Noise emission response actions/procedures such as the suspension of onsite operations. It is primarily controlled by good operational practice through effective implementation and monitoring of this Noise Emissions Management Plan along with relevant sections of the site EMS.

4.2.2 The procedures are as follows:

Table 3: Noise Management Action Levels

Action Level	Operation Conditions	Onsite Procedures
	Low Noise Levels (Minimal Noise Arising from Operation)	1. No mitigation required as measures detailed above are being implemented/infrastructure is in place to manage noise levels. 2. Ongoing monitoring by all staff members. 3. Management monitors the effectiveness of mitigation measures. 4. Daily mitigation measures and controls implemented. 5. Daily inspections undertaken by a member of the site management team. 6. Drivers inspect vehicles prior to operation and machine operators complete daily defect inspections prior to operations commencing.
	Medium Noise Levels (Noise Arising from Operation)	1. Ongoing monitoring by all staff members & Senior Management. 2. Daily mitigation measures and controls as detailed in this NEMP are implemented & monitored 3. Daily inspections undertaken by management team 4. Ongoing review of mitigation measures to ensure they are effective (Senior Management/External Consultant)
	High Noise Levels (Noise Emissions Escaping the Site Boundary).	1. Complete Procedures as detailed in Section 5 of this NEMP Document. 2. Incident recorded within Noise Assessment Form Appendix NEMPB. 3. Remedial measures reviewed and implemented to reduce noise at source. 4. Potential for operation to cease until conditions improve.

5. Monitoring

5.1 General

5.1.1 A thorough monitoring schedule (as detailed below) will be implemented to assess the effectiveness of the controls put in place to prevent the escape of Noise emissions causing an adverse impact.

5.1.2 In addition, the following are also included in the monitoring schedule:

- Process controls;
- Noise releases;
- Transport through the atmosphere; and
- Impacts

5.1.3 Furthermore, the following are also included in the monitoring schedule:

- Compliant response;
- Site, pathway and community monitoring undertaken by official bodies; and
- Detailed record keeping and reporting.

5.2 Monitoring for Noise (Ongoing Onsite Monitoring Schedule)

5.2.1 The Site will undertake regular, daily monitoring to ensure that Noise control measures are being followed and are effective.

5.2.2 Routine daily audial (Noise) assessments are conducted at locations within the site boundary as shown in (Appendix NEMPD).

5.2.3 The site will operate a colour-coded system for monitoring Noise conditions on the site as detailed in Table 3 above.

5.2.4 Staff members responsible for monitoring Noise conditions will receive internal training.

5.3 Monitoring Locations (Monitoring Schedule)

5.3.1 Noise monitoring points have been identified for subjective observation purposes and are detailed on the site plan in (Appendix NEMPD). The most prominent wind directions are from the South South-westerly direction.

5.3.2 Monitoring Point Descriptions are detailed below:

Table 4: Noise Monitoring Points

Ref	Receptor Type	Address
R1	Operation	Processing/Storage Area
R2	Operation	Processing/Storage Area
R3	Operation	Processing/Storage Area
R4	Residential	Rear of Houses
R5	Residential	Rear of Houses
R6	Commercial/Industrial Activities/Access Road	Access Road to the Site/Industrial Area
R7	Commercial/Industrial Activities/Access Road	Adjacent to Industrial/Commercial Activities.

5.3.3 In the event of an abnormal noise being identified beyond the permitted boundary (in the form of a compliant for example) during the operational day, a Responsible Person will go to each of the identified monitoring locations identified within Appendix NEMPD, observe audial conditions for the presence of excessively loud or tonal noises.

5.3.4 All findings of the assessments will be recorded in the Noise Assessment Form in Appendix NEMPB along with prevailing weather conditions at the time e.g., high winds and any abnormal events that may be affecting site operation.

5.3.5 The procedure for undertaking an audial (Noise) assessment is detailed in Appendix NEMPA.

5.3.6 If an assessment indicates that an abnormal noise has arisen from the site recently, an assessment of the site processes will be carried out to trace the source of observed noise so that appropriate corrective action can be taken with the aim to minimise or eliminate the source.

5.3.7 This feedback loop will ensure that corrective and preventative measures are in place if such conditions arise in the future.

5.3.8 In the event of abnormal noise sources being identified, or as a result of any assessments made by the Environment Agency the site management will be informed, and the appropriate corrective and preventative measures taken.

6. Complaints

6.1.1 In order that the veracity of any noise complaints can be substantiated it is imperative that the site is immediately informed either by the complainant themselves or by the Environment Agency. The site telephone number is clearly displayed at the site entrance and residents are encouraged to immediately contact the site and/or Environment Agency in the event of any off-site Noise that might be attributable to site operations being detected.

6.1.2 On receipt of a Noise complaint, a Responsible Person (Site Manager/TCM in the first instance or a suitably appointed and trained member of the Management Team) will visit the location of reported event within 2 hours of the compliant being received).

6.1.3 Information to be gather is detailed & will be recorded on the Complaint Log Form (Appendix NEMPC), which will include the time of the complaint being correlated with on-site activities – the site diary will be checked for 'abnormal' site operations/conditions at the time of the complaint as well as the duration of the Noise release to which a substantiated complaint relates will be recorded in the Site Diary and Complaint Log Form (Appendix NEMPC).

6.1.4 Management (Director/Site Manager & TCM in the first instance) are responsible for managing these processes; will review the compliant information received and will liaise with the complainants (if the complainant has requested to be given an update on the situation following investigations), which may include any abnormal activities that might have caused the elevated noise levels, actions the site will be or has taken and next steps to control noise emissions (if required or deemed necessary by Management). Feedback will be provided to the complainant as soon as is practicable following the completion of the investigation and Management review. Feedback attained from the complainant will be recorded within the site diary or on a separate sheet to be filed with the Complaint Log Form (Appendix NEMPC), which will form part of any follow up discussions with the complainant.

6.1.5 Potential remedial action could include the suspension of plant/equipment, reviewing compliance documentation, determining if any further measures can be taken to control noise emissions.

6.1.6 All complaint forms will be kept until the surrender of the permit.

6.1.7 In the event of a noise compliant that has been substantiated the Environment Agency will be notified (within 48 hours of the compliant being notified to the Operator).

6.1.8 All records will be available for inspection by Environment Agency representatives.

6.1.9 Management will be responsible for ensure that the complaints procedure is effective and current, which will be reviewed in the event of a compliant with the support of their appointed Environmental Consultant.

7. Noise Emissions Management Plan Review

7.1.1 This plan will be reviewed on a regular (annual or as frequently as required) basis. This will include:

- Review of any complaints received, and remedial action taken
- Review of reported incidents of Noise release to establish effectiveness of mitigation measures
- Recommendation on additional measures to be implemented as appropriate

7.1.2 In the event of any substantive changes being made, the relevant authorities e.g., Environmental Health Officer or Environment Agency will be advised.

7.1.3 In the event of the site operation being modified that may impact on Noise generation potential, this plan will also be reviewed, and appropriate measures taken. Additionally, in the event of operational modification the Environment Agency will be provided with a revised copy of this Noise Emissions Management Plan.

Appendix NEMPA: Noise Assessment Procedure

Routine assessments can be used to build up a picture of the Noise impact that might emanate from the site could have on the surrounding environment over time and develop 'worst case' scenarios by doing assessments during adverse weather conditions or during abnormally Noisy parts of an operation. Ideally, use the same methodology to follow up complaints.

Testing will depend on:

- whether the testing is a respondence to a complaint;
- whether noise can be heard at a sensitive receptor(s);
- whether the source of noise is trying to be established;
- establishing the wind direction.

The assessment will involve someone walking along a route checking at the points identified in (Appendix NEMPD).

Also keep a note of any activities beyond the site boundary that could be the source of the Noise, contribute to the Noise, or be a confounding factor.

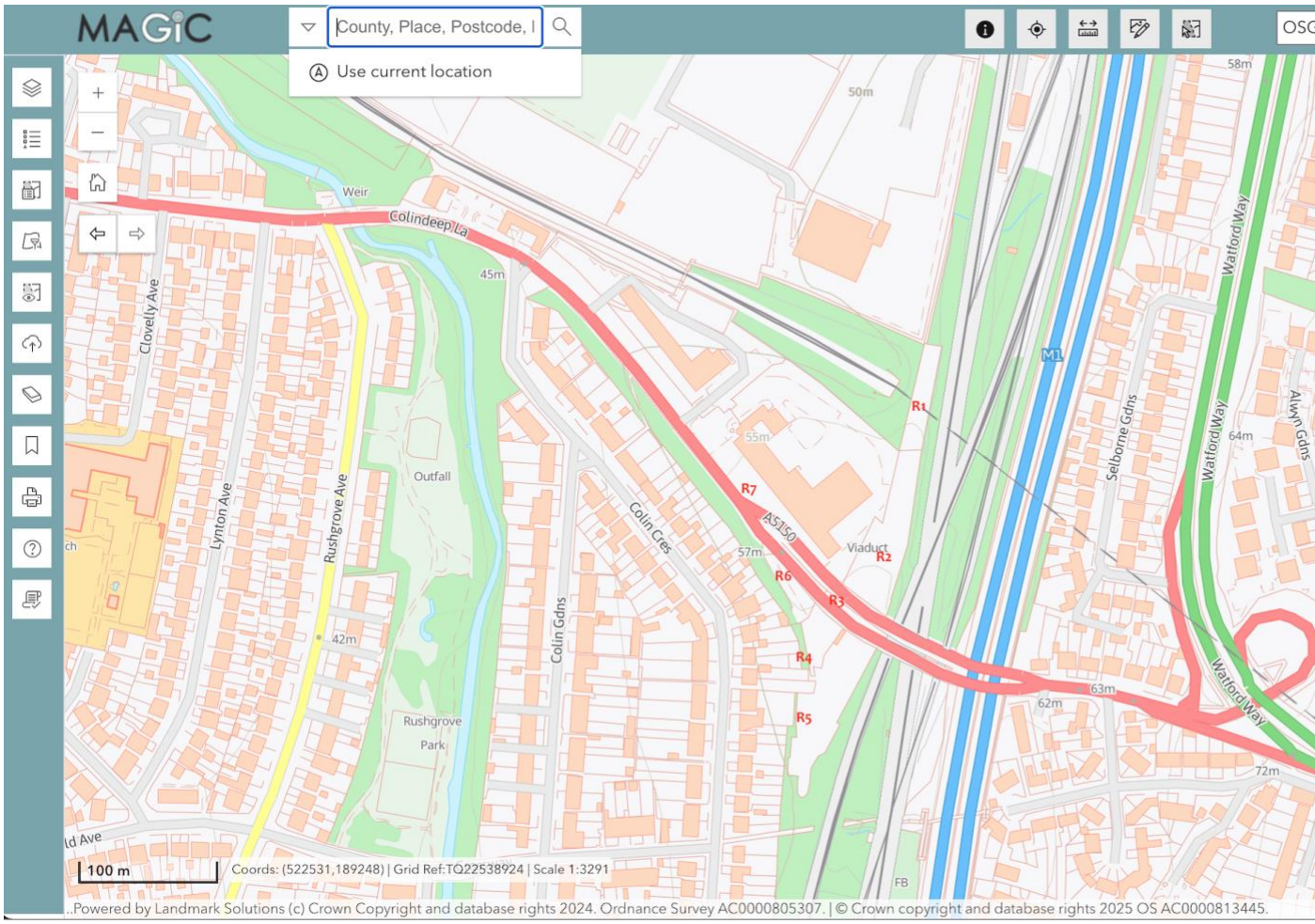
Appendix NEMPB: Noise Assessment Form

Noise Assessment Form										
Start Time of Check		AM		PM	Finish Time			AM		PM
Duration (Of Check)										
Location Of Check If Not On Site										
Weather Conditions	Dry		Rain		Fog		Snow		Other	
Temperature	Hot		Very Warm		Warm		Mild		Cold	
Wind Strength	None		Light		Steady		Gusting		Strong	
Wind Direction From	North		NE		E		SE			
	S		SW		W		NW			
Intensity	0 No Noise Present	1 Faint	2 Intermittent	3 Continuous						
Noise Detection	**Point 1**	**Point 2**	**Point 3**	**Point 4**	**Point 5**	**Point 6**	**Point 7**	**Point 8**		
Intensity (Using Above Scale)										
How Far Was It Travelling										
Is The Source Evident?										
If Yes-Name It										
Any Other Comments Or Observations										

Appendix NEMPC: Noise Complaint Form

Noise complaint report form	Date:	Ref. No.
Name and address of complainant		
Tel no. of complainant		
Time and date of complaint		
Date, time and duration of offending noise		
Weather conditions (e.g., dry, rain, fog, snow)		
Wind strength and direction (e.g.,light, steady, strong, gusting)		
Complainant's description of noise (e.g., hiss, hum, rumble, continuous, intermittent)		
Has complainant any other comments about the offending noise?		
Any other previous known complaints relating to installation (all aspects, not just noise)		
Any other relevant information		
Potential noise sources that could give rise to the complaint		
Operating conditions at the time offending noise occurred (e.g., flow rate, pressure at inlet and pressure at outlet)		
Action taken:		
Final outcome:		
Form completed by		Signed

Appendix NEMPD: Monitoring Point Locations



Appendix NEMPE: Noise Management Infrastructure

