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**Wraik Hill Recycling Limited**
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# Wraik Hill Recycling Limited
# Elysian Fields

## Noise Management Plan

THE PERMITTING COMPANY

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## Noise Management Plan

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# 1. Introduction

## 1.1 Purpose

This Noise Management Plan (NMP) sets out how Wraik Hill Recycling Limited (the Operator) will prevent, and where prevention is not practicable minimise, noise and vibration from its proposed non-hazardous waste transfer and treatment facility at Elysian Fields, Wraik Hill, Whitstable, Kent, CT5 3BY (the Site), so that it does not cause pollution or annoyance beyond the Site boundary. The NMP forms part of the Environmental Management System (EMS, section 6.6 Noise/Vibration) and supports the Environmental Risk Assessment submitted with the application.

## 1.2 Scope

The plan applies to all activities within the permit boundary and to vehicle movements on the Site and on the private access to Wraik Hill, for all employees, contractors, drivers and visitors. It covers the permitted activities: acceptance, tipping, manual sorting with a 360-degree material handler, loading of segregated materials into skips and roll-on/roll-off (ro-ro) containers, storage pending removal, and onward transport. No crushing, shredding, screening, washing or heat treatment is proposed.

## 1.3 Legislative and guidance context

- The Environmental Permitting (England and Wales) Regulations 2016.
- Environment Agency guidance: Control and monitor emissions for your environmental permit (noise and vibration), and EPR H1 Environmental Risk Assessment guidance.
- Environment Agency guidance: Non-hazardous and inert waste: appropriate measures for permitted facilities.
- BS 4142:2014+A1:2019 Methods for rating and assessing industrial and commercial sound, for use should an assessment be requested by the Environment Agency.
- BS 5228-1:2009+A1:2014 Code of practice for noise and vibration control on construction and open sites, as a source of typical plant sound levels and best practicable means.

The application is structured around the controls of standard rules permit SR2022 No 4, with site-specific measures. The Operator will manage noise so that emissions are free from pollution outside the Site, as determined by the Environment Agency.

# 2. Site and Activity Description

## 2.1 Location and setting

The Site is centred on National Grid Reference TR 09814 63855 and covers approximately 0.4 hectares within Canterbury City Council's administrative area. It is a long-established developed yard (in similar use since at least 1999 according to the Groundsure aerial imagery) in a rural, agricultural setting within a small holding estate. Surrounding land comprises a Local Wildlife Site (former Seasalter Dairy Farm), woodland and agricultural land to the north and south, residential properties and farm buildings to the east and west, and a public house to the north-west. Main access is via Wraik Hill, approximately 190 m to the east. The Site is enclosed by 2 m perimeter fencing with a controlled gate.

### 2.2 Permitted activities and throughput

| Item | Detail |
|---|---|
| Activities | Waste transfer and treatment (R3, R4, R5, D9 limited to sorting, separation and bulking) and storage (R13, D15). |
| Annual limit | No more than 75,000 tonnes of waste accepted per year; no more than 300 tonnes stored at any one time. |
| Waste sources | Principally construction and demolition waste collected by the Operator's own skip-hire fleet (restricted O-licence). The Site is not an open-tip facility and accepts no third-party deliveries. |
| Processing | Waste is tipped inside a four-sided processing building, sorted by a 360-degree material handler and manual picking, then loaded immediately to skips (4 to 40 yard) and ro-ro containers. |
| Operating hours | 07:00 to 17:00 Monday to Friday; 08:00 to 13:00 Saturday; no operations on Sundays or Bank Holidays. The main gate is opened to receive waste only during these hours. |
| Fixed plant | None. No crusher, shredder, trommel, screen, baler or fixed fan/extraction plant. Mobile plant is stored on the hardstanding (see Drawing 3). |

### 2.3 Site layout

As shown on the Site Layout Plan (Drawing 3), the processing building and workshop are positioned centrally within the permit boundary, with ro-ro container bays to the north-east, a skip storage area to the south-west, the diesel tank and COSHH store on the northern boundary near the gate, mobile plant storage in the south and a quarantine container at the eastern corner. Locating noisier handling inside the building and towards the centre of the Site increases the distance and screening between the sources and the nearest receptors.

## 3. Sensitive Receptors

Receptors have been identified from the Sensitive Receptor Plan (Drawing 2), the Environmental Risk Assessment, the Fire Prevention Plan and the Site Condition Report. Distances are those reported in the supporting documents and are approximate.

| Receptor | Reported distance / direction | Notes |
|---|---|---|
| Nearest off-site residential property | Approx. 45 m (Technical Summary); approx. 150 m south (ERA) | Reported distances differ between documents. This plan adopts the more precautionary 45 m for the purpose of the assessment pending confirmation against the permit boundary plan. |
| On-site dwellings (x2) | Within the estate | Occupied by the business owner and a key holder. Operator-controlled, but included as receptors because occupants are present out of hours. |
| Public house | Approx. 148 m north-west | Customers and staff, including outdoor areas. |
| Residential properties, Pilgrims Lane | Approx. 283 m north-west | Residential area beyond the public house. |

| Receptor | Reported distance / direction | Notes |
|---|---|---|
| Local Wildlife Site (former Seasalter Dairy Farm) | Adjacent / close to the permit boundary | Ecological receptor: noise may disturb breeding birds and mammals. |
| Priority habitat deciduous woodland | Approx. 36 m NW, 58 m SW, 101 m S | Boundary woodland; also provides some screening and absorption. |
| Rake Hill ancient woodland | Approx. 291 m north | Ecological receptor. |
| Neighbouring farms, businesses and agricultural workers | Within 1 km, including Brookfield Farm (approx. 288 m NE) | Intermittent, working-hours occupancy. |
| The Swale SSSI / SPA / Ramsar | Approx. 700 m west | Overwintering and breeding birds; distant, screened by intervening land and woodland. |
| Users of Wraik Hill, Pilgrims Lane and local rights of way | Adjoining access routes | Transient receptors. |

## 4. Noise Sources

The principal sources of noise and vibration, and the controls applied to each, are summarised below. The full register is at Appendix A.

| Source | Nature of noise | Principal controls |
|---|---|---|
| Vehicle movements (skip lorries, ro-ro lorries, staff cars) | Engine, tipping gear, air brakes, reversing alarms, gate and tailgate noise | 10 mph limit, no-idling, one vehicle on site at a time, planned movements, minimal reversing, broadband reversing alarms, working hours only. |
| Tipping and sorting inside the building | Impact noise from waste dropping, 360 machine engine, bucket/grab impact on materials | Handling inside four-sided building, minimised drop heights, grab used in controlled motions, machine maintained and fitted with silencers. |
| Loading skips and ro-ro containers | Metal-on-metal impact, hydraulic and chain noise | Containers placed, not dropped; heavy materials lowered; no throwing of materials; containers positioned away from receptor-facing boundaries where practicable. |
| Mobile plant (360 handler and any ancillary plant) | Engine and hydraulic noise, reversing/travel alarms | Regular servicing, intact exhaust and engine covers, switching off when idle, broadband alarms. |
| Workshop and diesel tank | Occasional tools, fuel delivery | Noisy maintenance during permitted hours only; fuel deliveries within working hours. |
| Ground-borne vibration | Loaded vehicles and plant movements, container placement | Speed limit, maintained hardstanding, controlled placement of containers. No vibration-generating fixed plant. |

There is no mechanical treatment on the Site: no crushing, shredding, screening or other size-reduction or separation plant is used. Waste is sorted manually. The 360-degree material handler is used only to assist manual sorting and to load segregated materials into containers, and is not a treatment process.

# 5. Assessment of Noise Risk

## 5.1 Approach

The assessment follows the source–pathway–receptor approach of EPR H1 and is consistent with the Environmental Risk Assessment, which rates the risk from both HGV movements and internal handling as Low likelihood, Low consequence and therefore Low overall risk. The Operator has not carried out a baseline noise survey. In line with Environment Agency practice for low-risk waste transfer activities, the assessment uses recognised industry-standard assumptions and will be supported by a formal BS 4142 assessment by a competent acoustician only if the Environment Agency requires it.

## 5.2 Indicative screening

Typical sound levels for wheeled loaders and excavators in BS 5228-1 data are in the order of 75 to 85 dB LAeq at 10 m under working conditions. Allowing for geometric spreading alone (6 dB reduction per doubling of distance, no screening, no atmospheric or ground absorption), the following reductions apply relative to the 10 m reference:

| Receptor distance | Reduction vs 10 m | Notes |
|---|---|---|
| 45 m (nearest reported residential) | approx. 13 dB | Plant working within the building and behind perimeter structures and vegetation will be further attenuated. |
| 148 m (public house) | approx. 23 dB | |
| 150 m (ERA nearest residential) | approx. 24 dB | |
| 283 m (Pilgrims Lane) | approx. 29 dB | |

Further attenuation will arise from the walls of the processing building, the intervening buildings, boundary fencing, woodland belts and the rural ground cover. Because activities occur in daytime hours only, and the Site has been used as a developed yard for over 25 years, the risk of significant adverse impact from the proposed operation is considered to be low. The nearest receptors are, however, close enough that the controls in section 6 are relied upon and will be actively verified (section 7). Distances to the nearest residential property will be confirmed against the final permit boundary plan before submission.

## 5.3 Ecological receptors

Noise from the Site is steady, low-level, daytime-only and in a location already used as a yard. No night-time operations, floodlit working or impulsive noise sources are proposed, so disturbance to the adjacent Local Wildlife Site, ancient woodland and the Swale designations is considered unlikely. Any complaint or observation of disturbance will be investigated as set out in section 8.

# 6. Noise Control Measures

## 6.1 Hours of operation

- Waste acceptance, sorting, loading and vehicle movements take place only between 07:00 and 17:00 Monday to Friday and 08:00 and 13:00 on Saturday.
- No waste operations on Sundays or Bank Holidays. Arrival of vehicles before the gate is opened is not permitted; drivers are briefed not to wait on Wraik Hill or the access track with engines running.
- Emergency operations outside these hours (for example fire response) are the only exception.

### 6.2 Site design and layout

- All tipping and sorting takes place inside the four-sided processing building, which provides screening and enclosure of the main noise sources.
- Building doors and shutters are kept closed except when vehicles are entering or leaving, where practicable and consistent with safety and fire prevention requirements.
- Ro-ro containers and skips are positioned so that the container bodies and the processing building shield receptor-facing boundaries where practicable; tipping and loading occur on the side of the building away from the nearest receptors.
- Existing boundary fencing, vegetation and woodland screening are maintained and not removed.

### 6.3 Vehicles

- A 10 mph site speed limit applies across the Site and private access.
- A no-idling policy applies: engines are switched off when vehicles are stationary or waiting.
- Only one vehicle is accepted onto the Site at a time. Movements are planned in advance because the Operator's own fleet is the only source of waste, preventing vehicles queueing at the gate.
- The layout is designed to minimise reversing. Where reversing is unavoidable it is carried out slowly, with a banksman where necessary.
- Vehicles and plant use broadband (white-noise) reversing alarms in place of tonal bleepers where this is consistent with safety and the applicable risk assessment.
- Vehicle tailgates, tipping bodies and chains are operated carefully; slamming of tailgates and gates is not permitted. Radios and horns are not used unnecessarily.
- Access track and hardstanding surfaces are inspected and maintained to avoid potholes that cause rattling and ground-borne vibration.

### 6.4 Mobile plant and equipment

- The 360-degree material handler and other plant are serviced in accordance with manufacturer specifications. Exhaust silencers, engine and hydraulic covers and noise-attenuating panels are kept in place and in good condition.
- Defects likely to increase noise (damaged silencers, loose panels, worn bearings, squealing tracks or brakes) are reported on the daily check and rectified promptly. Plant that is excessively noisy is taken out of service until repaired.
- Plant is switched off when not in use and is not left idling.
- Where new or replacement plant is purchased, quieter models and low-noise specifications will be preferred.

### 6.5 Handling of waste

- Skip loads are lowered and tipped carefully; drop heights are kept to the minimum necessary.
- Heavy items (metal, concrete, large timber) are placed using the grab, not dropped or thrown into containers.
- Metal skips and ro-ro containers are placed and lifted gently, not dropped or dragged across hardstanding.
- Waste is not loaded to containers by hand throwing; chute or controlled placement is used.
- Material is removed from the Site regularly so that stockpiles remain low and activity is spread evenly through the working day.

### 6.6 Other site activities

- Workshop maintenance involving percussive tools, grinding or running engines is carried out only within permitted hours and with the workshop doors closed where practicable.
- Fuel deliveries and other third-party deliveries to the Site take place only within permitted hours.
- Shouting, amplified music and non-essential use of radios on the open yard are not permitted.

### 6.7 Vibration

No vibration-generating fixed plant is proposed. Vibration from vehicles and plant on the surfaced yard is controlled by the speed limit, surface maintenance and controlled placement of containers. Vibration is considered unlikely to be perceptible at the nearest receptors, and any complaint will be investigated under section 8.

## 7. Inspection and Monitoring

The Operator will check the effectiveness of the controls in this plan through routine inspection, recorded in the site diary (EMS Appendix 5). No continuous noise monitoring is proposed because of the low assessed risk; the inspections below are the primary monitoring mechanism.

| Check | Frequency | What is checked |
|---|---|---|
| Daily check | Start of each operating day and during the day | Doors and shutters; plant silencers, covers and alarms in working order; no unusual noise from plant; speed limit signage; vehicles not idling; no queueing on Wraik Hill. |
| Walk-round at the site boundary | Daily during operations (including a brief listen at the boundary nearest receptors) | Any noise that is distinctly audible, tonal, impulsive or intermittent at the boundary is recorded, with the activity causing it, and corrected. |
| Weekly inspection | Weekly | Condition of hardstanding and access track; condition and placement of skips and ro-ro containers; maintenance requirements of plant; complaints received. |
| Plant maintenance | In accordance with manufacturer schedule | Service records for the 360 handler and HGVs; silencer and alarm condition. |
| Management review | At least annually and following any complaint upheld or change in operations | Effectiveness of controls, complaint trends, changes in plant, layout or hours. |

A standard checklist is provided at Appendix B. Records are retained with the EMS for at least the period required by the permit. If the Environment Agency requests a noise assessment, or complaints indicate that the controls are not effective, the Operator will commission a BS 4142 assessment by a suitably competent acoustician and implement any additional measures recommended.

## 8. Complaints and Investigation

Complaints are handled under the Complaints Procedure in the EMS (section 2.12 and Appendix 6). For noise, the following applies:

- All complaints, whether made in person, by phone, email or via the Environment Agency or local authority, are logged on the Noise Complaint Record (Appendix C) with the date, time, complainant, location, description and weather and wind conditions.
- The Site Manager acknowledges the complaint within one working day and starts an investigation immediately. Operations on the day, plant in use and vehicle movements are reviewed against the site diary.
- Where a source on the Site is found to be causing a disturbance, the activity is modified or stopped until the cause is rectified, and the corrective action is recorded.
- The complainant is informed of the outcome and of the actions taken within five working days where contact details have been given.
- Complaints and the outcome are reported to the Environment Agency in line with the permit conditions. Repeated or substantiated complaints trigger a review of this plan and, if required, a BS 4142 assessment.

Contact details for complaints are displayed at the Site entrance. The Environment Agency incident hotline is 0800 80 70 60 (24 hours).

## 9. Abnormal Events and Contingency

| Event | Response |
|---|---|
| Plant breakdown or damaged silencer producing excessive noise | Stop the machine, report to the Site Manager, take out of service until repaired or replaced; record in the site diary. |
| Vehicle alarm or refrigeration/auxiliary equipment fault | Driver to switch off where safe to do so; vehicle repaired before returning to service. |
| Unexpected increase in vehicle numbers or queueing at the gate | Delay or reschedule collections; hold vehicles on the Operator's land, not on the public road; engines off. |
| Operations running late | Vehicle and plant movements stop at the end of permitted hours; no loading, tipping or sorting after closing time. |
| Alarm activation out of hours (intruder, fire detection) | Key holders respond as set out in the Fire Prevention Plan; alarm sounders are limited and reset promptly. |
| Substantiated complaint | Investigate and correct under section 8; review this plan; notify the Environment Agency as required. |

## 10. Roles, Responsibilities and Training

| Role | Responsibility for noise management |
|---|---|
| Operator (Wraik Hill Recycling Limited) | Provides resources to implement this plan; approves changes to hours, plant or layout; ensures permit compliance. |
| Technically Competent Manager (Stephen Griffiths, CIWM/WAMITAB Level 4) | Oversees compliance with this plan, reviews records and complaints, advises on changes and liaises with the Environment Agency. |
| Site Manager / nominated site contacts (Luke Hadlow, Lisa Hills) | Day-to-day implementation, inspections, complaint handling and record keeping. |

| Role | Responsibility for noise management |
|---|---|
| Drivers, plant operators and site staff | Follow the controls in section 6, report defects and complaints, and operate plant considerately. |

All staff, drivers and contractors receive induction on this plan, covering the working hours, speed and idling rules, careful handling of containers and waste, and how to report noise problems. Refresher briefings are given annually and after any change to the plan. Training is recorded on the training matrix (EMS Appendix 3).

## 11. Review and Improvement

This plan will be reviewed at least annually, and sooner after any substantiated complaint, an Environment Agency request, a change to plant, layout, tonnage or operating hours, or a significant incident. Reviews and any resulting actions will be recorded in the document revision history and the site diary.

# Appendix A – Noise Source Register

| Ref | Source | Location | When | Controls |
|---|---|---|---|---|
| N1 | 360-degree material handler | Processing building; yard | Operating hours | Silencer and covers maintained; no idling; broadband alarm; inside building where possible. |
| N2 | Skip lorry arrival and departure | Access track, gate, yard | Operating hours; planned | 10 mph; no idling; one vehicle at a time; minimal reversing. |
| N3 | Tipping of skip loads | Processing building | Operating hours | Inside the building; minimised drop heights; doors closed where practicable. |
| N4 | Loading ro-ro containers and skips | Ro-ro bays (NE), skip storage (SW) | Operating hours | Containers placed not dropped; careful loading; shielded by building where practicable. |
| N5 | Metal containers moved or dragged | Yard | Operating hours | Lifted, not dragged; gentle placement. |
| N6 | Reversing alarms | Yard and bays | Operating hours | Broadband alarms; reversing minimised; banksman. |
| N7 | Workshop and diesel tank deliveries | Workshop; northern boundary | Operating hours | Permitted hours only; doors closed where practicable. |
| N8 | Staff, radios and voices | Yard | Operating hours | No amplified music; considerate conduct. |
| V1 | Ground-borne vibration from vehicles and plant | Access track and yard | Operating hours | Speed limit; surface maintenance; controlled placement. |

## Appendix B – Daily / Weekly Noise Inspection Checklist

Complete the daily section at the start of each operating day and record the weekly section once per week. File with the site diary.

| Check | Yes | No | Comments / action |
|---|---|---|---|
| Doors and shutters closed when not in use? | | | |
| Plant silencers, covers and panels in place and undamaged? | | | |
| Reversing alarms working and of the broadband type? | | | |
| Vehicles and plant switched off when stationary? | | | |
| Site speed limit signage in place and observed? | | | |
| No vehicles queueing or waiting on Wraik Hill? | | | |
| Any noise distinctly audible at the boundary (tonal, impulsive, intermittent)? | | | |
| Containers placed carefully, no dropping or dragging? | | | |
| Any complaints received since the last check? | | | |
| Weekly: hardstanding and access track free of potholes? | | | |
| Weekly: plant service/maintenance records up to date? | | | |

Date: _____ Inspector: _____ Signature: _____

# Appendix C – Noise Complaint Record

| Item | Details |
|---|---|
| Reference number | |
| Date and time of complaint | |
| Date and time of the noise event | |
| Complainant name and address (if given) | |
| Contact details | |
| Description of noise (type, duration, level of annoyance) | |
| Weather and wind conditions | |
| Activities, plant and vehicles on site at the time | |
| Investigation findings | |
| Corrective action taken | |
| Date complainant informed of outcome | |
| Environment Agency notified? (date) | |
| Completed by / date | |