

From: Sam Dumbrell
To: ["Christopher Herbert"](#)
Cc: [Kirstie May](#); ["Chris Foss"](#) [REDACTED]
Subject: RE: WSCC/104/13/SR - Condition 6
Date: 16 May 2016 10:34:00
Attachments: [RE WSCC10413SR - Condition 6.msg](#)
[Noise Management Plan Rev 1.pdf](#)
Importance: High

Chris,

Thanks for your email today and BCR's confirmation that the suggested way forward (within my email sent 09/05/16 @ 16:03) is accepted. Sorry for the delay in getting this sorted. Condition 6 reads as:

Noise Management Plan

6. The development hereby permitted shall not take place, including site clearance works, until a noise management plan detailing the measures to be taken to ensure 'best practicable means' of noise prevention, reduction and minimisation (including provision for ongoing review, and dealing with noise complaints) has been submitted to and approved in advance and in writing by the County Planning Authority. Thereafter, the approved plan shall be implemented in full throughout the operation of the development hereby permitted.

Reason: To accord with paragraphs 109, 120 and 123 of the NPPF (2012) to protect the amenities of the local population and the local environment.

The noise management plan (comprising the attached NMP Rev 1.pdf and my email sent 09/05/16 @ 16:03) is approved. The approved plan shall be implemented in full throughout the operation of the development hereby permitted.

Regards, Sam

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Noise Management Plan

Washington Sandpit, Sullington, West Sussex

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1.0 INTRODUCTION

Britaniacrest Recycling Limited has appointed SLR Consulting Limited to produce a Noise Management Plan (NMP) for their Washington Sandpit site located in Sullington, West Sussex.

The Noise Management Plan is required to discharge Condition 6 of the Planning Permission for the site issued by West Sussex County Council (Ref: WSCC/104/13/SR), which states:

“The development hereby permitted shall not take place, including site clearance works, until a noise management plan detailing the measures to be taken to ensure ‘best practicable means’ of noise prevention, reduction and minimisation (including provision for ongoing review, and dealing with noise complaints) has been submitted to and approved in advance and in writing by the County Planning Authority. Thereafter, the approved plan shall be implemented in full throughout the operation of the development hereby permitted.”

2.0 GUIDANCE

2.1 Horizontal Guidance Note for Noise

The purpose of the *Horizontal Guidance Note for Noise Assessment and Control* is to provide supplementary information, relevant to all sectors, to assist applicants in preventing and minimising emissions of noise and vibration as described in the *Sector Guidance Notes* (or the General Sector Guidance Note).

The guidance is in two parts:

Part 1 – Regulation and Permitting – outlines the main considerations relating to the setting of Permit conditions and subsequent regulation of noise. Part 1 is aimed primarily at the information needs of regulators.

Part 2 – Noise Assessment and Control – describes the principles of noise measurement and prediction and the control of noise by design, by operational and management techniques and abatement technologies. Outline methods of noise control are provided such as:

- use of inherently quieter processes;
- selection of inherently quiet plant or “*low-noise options*”;
- site layout to maximise natural screening, screening by buildings and separation distances;
- orientation of directional noise sources away from sensitive receptors; and
- noise barriers or bunding.

3.0 OBJECTIVES AND STATUS

3.1 Objectives

NMP's are developed and employed to principally:

- identify and employ '*all appropriate measures*' to minimise the generation and noise and subsequent exposure / impact;
- prevent exposure of people outside the site to levels of noise which would result in complaints; and
- minimise the risk of unplanned '*noisy*' events which have the potential to result in offsite noise complaints.

This NMP serves to aid the decision-making process on the choice of controls, general site design, and operational practice in line with current industry best practice. The NMP is a working document with the specific aims of ensuring:

- noise impact is considered as part of routine operations;
- the minimisation of the risk of unplanned '*noisy*' events that could result in offsite complaints;
- noise is primarily controlled at source by good operational practices, the correct use and maintenance of plant, and operator training; and
- '*all appropriate measures*' are taken to prevent or, where that is not reasonably practicable, to minimise noise emanating from the installation.

3.2 Status

This NMP is a controlled document, and forms part of the site Management System.

The specification for the periodic review and update of this plan will be set out within the site Management System and will be on an annual basis, as a minimum.

However, this NMP is intended to be a live document which serves as a reference during daily operations, and as such would be updated on a more frequent basis should the following occur:

- significant changes are made to the plant or operational practices;
- the Local Planning Authority requests that the NMP is updated, in their role as regulator; or
- complaints are received, which on subsequent investigation result in the identification of further control measures or remedial action, in addition to those set out within this NMP.

4.0 SPECIFIC SITE NOISE LIMITS

Condition 6 of the Planning Permission does not include specified noise limits for the site at the nearest noise sensitive receptors; however with reference to the noise assessment for the site undertaken by SLR Consulting Limited (Ref: 416.01258.00004, dated August 2013), and the Environmental Health Department of Horsham District Council, it is considered that noise generated from site extraction operations should not exceed the prevailing background (L_{A90}) noise levels by more than 10dB(A).

It should also be noted that the above limit is in-line with those contained within the 'Assessing environmental impacts from mineral extraction' section of the on-line 'Planning Practice Guidance' which states:

"Mineral planning authorities should aim to establish a noise limit, through a planning condition, at the noise-sensitive property that does not exceed the background noise level ($L_{A90,1h}$) by more than 10dB(A) during normal working hours (0700-1900). Where it will be difficult not to exceed the background level by more than 10dB(A) without imposing unreasonable burdens on the mineral operator, the limit set should be as near that level as practicable. In any event, the total noise from the operations should not exceed 55dB(A) LAeq, 1h (free field)."

As part of the noise assessment the prevailing background noise levels were measured at the nearest noise-sensitive receptors to the site, with reference to these and the text above the derived noise limits at each of the nearest receptors considered are shown in Table 3-1 below.

It must be noted that the derived criterion figure has been rounded to the nearest decibel.

**Table 3-1
Noise Limits for Normal Operations, free-field dB**

Location	Period	Measured Background Noise Level L_{A90}	Derived Criterion, $L_{Aeq,1hr}$
1 – The Oaks	Daytime	41.0	51.0
2 - Cadrona		42.7	53.0
3 – Chanctonbury Lodge		53.9	55.0

Receipt of Complaint

If a complaint is received by a local resident, an investigation shall be instigated within one working day to identify the cause of the non-compliance/complaint.

Such an investigation may involve the identification and cessation of the activity or activities considered to be the cause of the complaint and/or the investigation of mitigation measures to reduce the noise emission levels from the activity or activities, for example the moving of plant to alternative areas of the site and/or the use of temporary screening mounds.

In the event that the complaint cannot be resolved by the above means a noise survey shall be undertaken as soon as possible to assess the noise levels against the noise limits set out in Table 3-1.

A complaints response system shall be maintained by Britaniacrest Limited for the site enabling any complaints regarding noise to be reported and appropriate action taken.

5.0 NOISE MANAGEMENT MEASURES

5.1 Plant Operations

Within the constraints of efficient site operations and the requirements of the relevant British Standards, the following is advisable;

- limit the use of particularly noise plant, i.e. do not use particularly noisy plant early in the morning;
- limit the number of plant items in use at any one time;
- plant maintenance operations should be undertaken as far away from noise-sensitive receptors as possible;
- reduce the speed of vehicle movements;
- ensure that tailgates are shut and locked before leaving the tipping area;
- ensure that operations are designed to be undertaken with any directional noise emissions pointing away from noise-sensitive receptors where practicable;
- when replacing older plant, ensure that the quietest plant available is considered wherever possible; and
- sequence activities so that early development provides screening to the nearby noise-sensitive receptors from subsequent operations.

5.2 Training

The current site induction programme and site rules should be revised to include good working practice instructions for site staff/managers and contractors to help minimise noise whilst working on the site.

Good working practice guidance/instructions should include, but not be limited to, the following points:

- avoid un-necessary revving of engines;
- plant used intermittently should be shut-down between operational periods;
- avoid reversing wherever possible;
- ensure that tailgates are shut and locked before leaving the tipping area;
- drive carefully and within the site speed limit at all times; and
- report any defective equipment/plant as soon as possible so that corrective maintenance can be taken.

5.3 Maintenance

A weekly inspection of all plant shall be made to ensure that:

- Any plant found to be requiring interim maintenance should be identified by the operator and repairs undertaken by a qualified engineer as soon as possible.
- Regular and effective maintenance of plant can play an important part in keeping noise levels under control.
- Always ensure that doors fitted to acoustic enclosures around fixed plant remain closed, the fitting of self-closing mechanisms is advisable.

5.4 Action Plan

The noise management plan, outlined in Appendix A, details the actions which should be undertaken following a complaint being received. In the event that these measures do not

resolve the complaint then Britaniacrest Ltd will undertake noise monitoring as outlined in Appendix B.

6.0 CLOSURE

This report has been prepared by SLR Consulting Limited with all reasonable skill, care and diligence, and taking account of the manpower and resources devoted to it by agreement with the client. Information reported herein is based on the interpretation of data collected and has been accepted in good faith as being accurate and valid.

This report is for the exclusive use of Britaniacrest Recycling Ltd; no warranties or guarantees are expressed or should be inferred by any third parties. This report may not be relied upon by other parties without written consent from SLR.

SLR disclaims any responsibility to the client and others in respect of any matters outside the agreed scope of the work.

APPENDIX A – NOISE MANAGEMENT PLAN

APPENDIX A

**Table A.1
Noise Sources**

Source of noise and/or vibration	Source Reference	Nature of noise source	Contribution to overall site emission levels
Material Crushing & Screening			
Warrior 1400 Tracked Screen	Tracked Screen	Daytime, 83% on-time – clatter	High
Material Movement, Loading and Tipping			
JCB JS220 Excavator	Excavator	Daytime, 83% on-time – clatter	Medium
CAT D6T Dozer	Bull Dozer	Daytime, 83% on-time – clatter	High
Loading Shovel	Loading Shovel	Daytime, 83% on-time – clatter, impact noise when tipping	Medium
Material Delivery & Collection			
FX1400-E Wheel Wash	Wheel Wash	Daytime, 50% on-time – intermittent hum	Low
Delivery Collection Lorries – Movements along the access road, via the weighbridge to the processing area in the centre of the site	Heavy Goods Vehicles	Daytime – clatter	Medium

**Table A.2
Demonstration of Appropriate Measures**

Location	Source reference	Details of Appropriate Measures actions/abatement in use	Further Appropriate Measures if Required	Timescale
Material Crushing & Screening				
1 – The Oaks	Tracked Screen	Situated on the southern boundary of the site	Additional localised temporary screens.	As required
2 – Cardona				
3 – Chanctonbury Lodge		Situated in the centre of the site		
Material Movement, Loading and Tipping				
	Excavator	Use of temporary screens around the area where the excavator and dozer are operating.	Make best use of natural topography (quarry face).	As required
	Dozer			
All Locations	Loading Shovel	Not operating at the quarry face if possible (closest approach to the receptor).	Keep on-site haul routes clear from debris and free from ruts and bumps to avoid body slap.	As required
Material Delivery & Collection				
All Locations	Lorry Movements	Haul routes routed behind as much natural screening as possible to give maximum noise protection to local receptors.	All haul routes within the site boundary should be kept clean and free from potholes, ruts or bumps in order to avoid rattle and/or body slap.	As required
	Wheel Wash	Only operational when heavy goods vehicles are leaving the site, located at a position within the site compound which utilises best use of the screening provided by site office buildings.		

APPENDIX B – NOISE MONITORING SCHEME

B.1 Purpose

The purpose of the scheme will facilitate data acquisition to demonstrate to the Local Planning Authority that the permitted development is being operated within appropriate noise limits and in such a manner as to minimise the noise impact at nearby noise-sensitive receptors.

B.2 Noise Sensitive Locations

The closest noise-sensitive receptors are considered to be:

1. The Oakes to the north of the site;
2. Cardona to the east of the site; and
3. Chanctonbury Lodge to the south of the site.

Where possible, the noise monitoring locations selected should allow noise information that is representative of the identified locations to be gathered without the necessity to access private land.

B.3 Noise Measurement Equipment

Environmental noise levels shall be measured using sound level meters conforming to type 1 or better of the latest versions of British Standard EN 61672-1:2003 *Electro-acoustics, Sound Level Meters, Specifications*.

The sound level meters shall be field-calibrated before and after monitoring using an acoustic calibrator conforming to the latest version of British Standard EN 60942:2003 *Electro-acoustics – Sound Calibrators*.

All sound level meters shall be calibrated to a traceable standard by a UKAS-accredited laboratory, or equivalent, within a 24-month period before the survey and all acoustic calibrators shall be calibrated to a traceable standard by a UKAS-accredited laboratory, or equivalent, within a 12 month period before the survey.

B.4 Noise Survey Methodology

Noise measurements shall be undertaken by a suitably qualified person at the noise-sensitive locations identified in Section B.2 on this Appendix. The noise measurements shall be undertaken during a normal working day and night, during typical working hours, avoiding meal breaks and times when plant and equipment within the site are not operational.

Noise levels shall also be measured during a period when the site is not operational, for example during a lunch break or shift change, to enable the noise levels attributable to site operations alone, to be determined by decibel subtraction.

The sound level meter shall be positioned such that the microphone is located 1.2 to 1.5 metres above local ground level in free-field conditions, i.e. at least 3.5 metres from the nearest vertical, reflecting surface, at all survey locations.

Operational noise levels shall be measured over a one-hour period during the normal working day.

A note of the prevailing weather conditions shall be made at the time of the survey and the audibility of the site shall be noted at each measurement location during each measurement period.

B.5 Frequency of Measurements

Noise monitoring will be undertaken in the event that noise complaints cannot be resolved by the measures outlined in Appendix A in its frequency and an assessment of the risk of potential impact should be made for all operations, with monitoring being undertaken when:

- operations are being undertaken close to the site boundary;
- operations are outside the specification for the normal operation of the site; and
- operations are being undertaken at elevated positions within the site.

B.6 Reporting

On completion of each noise survey a report shall be prepared and issued to Britaniacrest Limited in a format suitable for submission to the Local Planning Authority. Depending on the prevailing weather conditions, the report shall be submitted within ten working days of a written request from Britaniacrest Limited to undertake the monitoring.

The report shall contain, as a minimum:

- the results of the noise survey, i.e. noise levels during site operations and noise levels with the site not operating, in terms of the L_{Aeq} , and L_{A90} noise indices;
- details of the instrumentation used including calibration details;
- details of the prevailing weather conditions on the day of the survey;
- details of the audibility of the site; and
- details of any extraneous noise sources that influenced the noise climate.

B.7 Data Retention

The noise survey data obtained during the noise surveys shall be retained by Britaniacrest Limited or by agreement by their sub-consultant for the full duration of the permitted operations.

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Waste Management

From: Sam Dumbrell
To: ["Christopher Herbert"](#)
Cc: [Kirstie May](#); [REDACTED]
Subject: RE: WSCC/104/13/SR - Condition 6
Date: 09 May 2016 16:02:00
Attachments: [REDACTED]

Chris,

Your/BCR'S position is as 21/12/15, that is *"The request by the EHO for noise monitoring goes beyond the scope of the condition. The condition requires a noise management plan detailing measures of noise prevention, reduction and minimisation – it does not require monitoring. The condition does ask about dealing with complaints and the scheme does then propose monitoring as a means of establishing and dealing with complaints. We therefore consider that our currently submitted scheme complies with the requirements of the condition."*

Me and my enforcement colleagues propose the following (based on the condition's wording, your comments above and that the site commenced operations in Feb 2015):

- the condition's required NMP does not include a requirement for 'monitoring' rather '*best practicable means of noise prevention, reduction and minimisation*'.
- the condition does include a requirement for '*including provision for ongoing review, and dealing with noise complaints*'.
- the site has been operating for around 1 year without any noise related complaints being received.
- Section 4.0 of the submitted NMP talks about "*receipt of complaints*" and "*actions to resolve them against the 3 nearest residential receptors and against maximum acceptable noise levels*".

Presuming that BCR's views are the same as 21/12/15, the below (adapted from the submitted NMP) would seem to work.

- The Site Manager will be responsible for ensuring that all complaints are investigated promptly and resolved. An investigation shall be instigated the next working day to identify the cause of the complaint.
- All complaints will be recorded, investigated and corrective actions implemented and feedback given to the complainant.
- The County Planning Authority will be advised of any complaint received and the actions taken to investigate the validity and if required, any action/s undertaken to rectify the situation as necessary.
- Where appropriate, a noise complaint will be investigated to ensure that '*best practicable means of noise prevention, reduction and minimisation*' are being used to control noise and to assess whether any corrective action taken was sufficient.
- The requirement for any noise monitoring* and reporting as part of logging a complaint, including the corrective and preventative action administered, will be identified. The site manager will seek technical input to investigate a complaint from an acoustic expert as required.

*The results of the monitoring shall include noise levels as defined within BS 7445-1:2003 (Description and measurement of environmental noise. Guide to quantities and procedures), the weather conditions at the time monitoring was undertaken, details and calibration of the equipment used for measurement and comments on other sources of noise which affect the noise climate.

If the results indicate that the noise levels exceed those set out in Table 3-1 on page 5 of the submitted NMP (ref: 416.01258.00004, dated September 2015), a Noise Mitigation Scheme shall be submitted to and agreed in writing by the County Planning Authority within one week of the noise monitoring results being submitted.

Please advise. I think it's reasonable, relevant, precise and most importantly enforceable, in the event of a noise complaint being received by the operator and/or WSCC.

Regards, Sam

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