

Lancashire County Council
Development Management Group
Environment Directorate
PO Box 100
Preston
Lancashire
PR1 0LD

Our ref: NO/2020/112968/02-L02
Your ref: LCC/2020/0052
Date: 13 November 2020

Dear Sir/Madam

**ERECTION OF RECYCLING WASH PLANT TO PROCESS SELECTED WASTES;
COMMON BANK WORKS, COMMON BANK LANE, CHORLEY, PR7 1NR**

Thank you for consulting us on the above application on, 13 October 2020.

We have considered the Noise Impact Assessment (NIA) which has been submitted by the applicant, and have some concerns that it may underestimate the potential impact from the proposed development. Some detailed observations and queries on the NIA are provided below. We understand that the authority is already intending to request a revised NIA from the applicant, and suggest that the issues below are addressed in the resubmission.

We understand that the site is currently allowed to operate 0700-1800 Mon-Sat, and that there are no additional restrictions on operation of specific activities or machinery. Given the scale of the installation being proposed and the possibility of exacerbating existing noise impacts reported by local residents we would suggest that the authority considers restricted hours of operation for the proposed machinery, in particular early mornings and Saturdays which are especially sensitive periods.

Specific observations on the submitted Noise Impact Assessment:

1. Identification of receptors

The applicant has considered only residential premises as noise sensitive receptors ('NSRs'). However, there are a significant number of office premises and other workplaces in the immediate vicinity of the site. We advise that the applicant should consider these premises as noise sensitive receptors in the assessment, or provide clear justification for not considering them.

Please see updated report including assessment of offices.

2. Plant noise levels

We would draw the authority's attention to the fact that the provided figures are manufacturer's standard data for the various elements of the wash plant system. No context is provided, but it is possible that these noise levels may not be fully representative of actual site operation e.g. the materials to be processed on site.

The CDE noise survey of a similar wash plant were used in the assessment this survey indicates the noise measurements were undertaken with the wash plant in situ operating under typical conditions it is assumed there fore that 'Typical Conditions' refers to the fact that aggregate was been washed at the time of the measurement and thus the noise data used in our assessment is deemed representative.

3. Selection of monitoring point for background sound levels

A single location MP1 was used to measure background sound over a four day period. It is stated that this location was chosen as it is in the vicinity of the nearest receptor, however it appears to be located some distance from both NSR 1 and NSR 4. It is even further from NSR 2 and NSR 3. There is no reasoning why this location is considered representative of background.

Initially we propsoed to measure closer to the surrounding NSRs specifically NSR 2 and 3 however upon visiting the site it was clear that the access road to these locations were private and we did not have permission to use them. Given this the monitoring location was chosen accordingly to obtain a robust and representative bassline LA90.

4. Assessment of background sound levels

Background levels were measured over four days Friday - Monday and included the existing site activities. It is not acceptable to include current operations as background. Background measurement should be taken when the site is not operational. The assessment should then compare this to the rating level of a fully operational site including the proposed changes.

Please see the revised report. The site was not operating during the survey as works were being undertaken to prep the site for the implementation of the wash plant.

5. Earth bund

This is stated to be 10 metres tall but our recent inspections have shown that it is currently significantly lower than this. No cross-sectional drawings are provided in the NIA and the applicant's consultants make no comment on the effectiveness of the bund in relation to size shape or construction. It is not stated what assumptions e.g. on shape the software has made.

Please see amended report, 5m and 2m earth bunds have been implemented.

6. Noise characteristics and corrections

The applicant has chosen to apply the lowest possible penalty for sound characteristics in the calculation of rating level. i.e. 2dB for tonality and 3dB for impulsivity. These penalties relate to the tonal/impulsive character of the noise being just perceptible, rather than clearly (4dB/ 6dB respectively) or highly (9dB/ 9dB respectively). No explanation has been provided for these decisions or why they have selected those penalties and not the higher levels. As noted above the

assessment is based on manufacturer noise data. It is not stated whether the assessment's authors have any first-hand knowledge of the noise characteristics of the machinery. It also depends on maintenance/ageing of the plant.

Given the distance the NSRs and the site and previous experience on similar sites it is deemed that any acoustic features would be just perceptible at worst.

7. Sensitivity of local residents, previous noise complaints

The applicant states in the Discussion on page 16 that *'The site is situated in an industrial/commercial area, and as such the local residents will likely have a higher tolerance for this type of industrial noise.'* No justification is provided for this assertion and we consider it is misleading. The residential NSRs are not located immediately adjacent to the industrial area, and we have received a number of complaints of noise from residents regarding the applicants existing activities.

There is a very large industrial area situated to the north and east of the NSRs further to this the development site is already an operational site and is classed as industrial. As such given the distance between the site, surrounding NSRs and existing industrial then general area in our option could be considered part industrial however we were not aware of any existing noise complaints that have been raised and thus we have removed this from the report.

8. Assertion that proposed machinery will produce similar noise to existing activities

The applicant also states in the Discussion *'Further to this, the site is already operational and as such the installation of the wash plant does not represent the introduction of a new sound source, as it is thought to generate similar noise to that of existing operations. Given this, the proposed development presents at worst a slight intensification of already existing noise types. Therefore, it can be assumed that the development will cause a low impact.'* There is no justification for this assertion here or elsewhere in the report that the proposed machinery will only produce noises which are similar in level and characteristics to noise from the existing activities.

Please see revised report with modelling of previously used noise sources on site for comparison with the proposed.

Should you require any additional information, or wish to discuss these matters further, please do not hesitate to contact me on the details below.

Yours faithfully

Mr Jeremy Pickup
Planning Advisor - Sustainable Places

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