

MEMORANDUM

From: Ian Jones
Public Protection Service Manager

To:
Planning Control Manager

Our Ref:

Your Ref: P/2022/0820, 21 & 22

Date: 22/12/22

Town and Country Planning Act 1990

Town and Country Planning (General Development Procedure) Order 1996

**Re: P/2022/0820, 0821 & 0822 - MAELOR FOODS PICKHILL LANE CROSS LANES
WREXHAM**

Having reviewed the odour assessment and noise reports I make the following comments:

Odour

The odour assessment (dated 12 September 2022) states that the proposed increase in capacity will result in a second line similar to the existing line being installed. This new line will also install new odour control equipment, again matching the existing, as well as adopt current odour control operating practices. The report also states that the proposal is expected to improve odour control practices by:

- Extension of existing scrubber stack to 15 m to match the proposed height of the new stack to better aid dispersion.
- More frequent removal of waste products (i.e. less storage time) to manage the increase in quantity brought on by the additional line.

The Council has received six odour complaints since the end of 2017 which were referred to NRW as the regulating agency. As it is now believed that most residents that could be affected by odour now report directly to NRW, that body could be best placed to confirm the number of complaints and their outcomes.

The report predicts that when the existing stack has its height increased and with the addition of the new line and odour abatement detailed in the report that odour levels will be below 1.5 ouE/m³ (odour units per cubic meter). The report suggests that using the category for intensive farming is appropriate arguing that odour is most likely to be from the processing of poultry though does acknowledge that there is a more severe category for the decay of animal products, within the guidance (Guidance on the assessment of odour for planning Version 1.1 – July 2018). It goes on to suggest a compromise value between these two levels. However, even by comparing the modelled odour levels against the most offensive levels there is likely to be a

'negligible' loss of amenity for people who have a 'low to medium sensitivity' to the odour and a 'slight' loss of amenity to those with a 'high' sensitivity to the odour (the guidance describes increasing loss of amenity as Negligible, Slight, Moderate and Substantial). It is important to bear in mind that odour is a subjective opinion and as a consequence, the guidance is only able to describe generalities.

It should also be noted that the facility will be controlled by an Environmental Permit issued by NRW which will contain conditions relating to odour.

Recommendation

Whereas the report is thorough in its assessment of onsite activities there has been no discussion of deliveries or removal off site, in particular the waste product/s. Given that the application is to double the operating capacity of the plant, I recommend that the applicant be asked to consider any impact from transport and mitigate any identified problems.

Noise

Plant Noise

The noise impact assessment (dated 08/09/22) predicts that the installation of the new plant will result in the existing 'target' night time (11pm to 7am) noise level being exceeded by 8dB at a receptor on Pickhill Lane. BS 4142 describes a background exceedance of +5db as being of adverse impact and +10dB as being significant adverse impact, both with context. However, the report does discuss the targets in BS8233 for amenity levels that are based on WHO recommendations.

It's also worth commenting that the report discusses an old recommended planning condition from this section that the background noise level not be exceeded by more than 5dB at the nearest sensitive receptor which the report has referred to as the 'target' when referencing the +8dB increase.. This condition has been retired and the more appropriate condition of 'not exceeding the background level at any time' is now the stance of this section. This is to prevent 'background creep' a situation where the background noise level increases incrementally by developments over time, with the end result being a louder environment. It is with this new condition in mind that this section has reviewed the acoustic report.

Noise impacts have been modelled at three locations:

- Pickhill Lane / A525 intersection
- Pickhill Lane itself
- Pickhill Lane / Talwrn Lane intersection

With the following difference between the background levels having been modelled:

Table 1: Plant noise comparison to background

Location	Day	Night
Pickhill Ln / A525	-15dB	-6dB
Pickhill Ln	+4dB	+13dB
Pickhill Ln / Talwrn	-21dB	-11dB

As can be seen the modelling numbers predicts a notable increase of the night time background level at Pickhill Lane indicative of a significant adverse impact at night time as well as an increase of the daytime background level. It should be noted that an increase in level of +10dB is perceived as a doubling of the 'loudness'.

The report has also considered the guidance in BS8233. It rightly quotes that an open bedroom window will typically give a noise reduction of 15dB, as the predicted noise level on Pickhill Lane is 45dB and reduction of 15dB will reduce this to 30dB which is the upper limit recommended by BS8233 in a bedroom for undisturbed sleep. The report concludes that based on this no mitigation is required.

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The acoustic report suggests that the above condition would not be met on Pickhill Lane for either day or night time. I therefore recommend that the developer be approached to devise a scheme to comply with the above condition, for both plant and HGV noise, prior to commencement.

p.p.

Ian Jones
Public Protection Service Manager

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