

Mr. Mark Durrington
Ipsen Biopharm Ltd
Ash Road
Wrexham Industrial Estate
Wrexham
LL13 9UK

Our ref: PAN-002089
Your ref: -
Date: 01 December 2017

Dear Mr. Durrington,

Returning your permitting application

Application reference: PAN-002089
Operator: Ipsen Biopharm Ltd
Facility: Wrexham Pharmaceutical Works, Ash Road, Wrexham
Industrial Estate Wrexham LL139UF

Thank you for your application received on 13 November 2017. We've looked at the extra information you sent us on 30 November 2017. Not all of the requests for further information, in our letter of 23 November 2017, have been addressed. Please see below the details we are missing. Unfortunately this means your application is not duly made and we must return it to you.

Unclear answers to questions

In our letter requesting further information we said that we required further clarification on a number of points of your application form. We have assessed that the additional information that you have recently submitted does not answer the queries we have raised.

Non-technical Summary

Application Form C2 Qu 2B

The non-technical summary that's been included is still unclear.

From the non-technical summary you've submitted it is not possible to discern which aspect of the current permit you wish to vary and how you wish to vary it. The detail included in this section does not address any changes to emissions to the environment which may occur as a result of the variation. No description is provided of the purpose of the equipment noted in this section, or how it relates to your overall process. As the non-technical summary doesn't clearly describe how you wish to vary your permit, we are not able to confirm that this is a minor technical variation.

Site Plan

Application Form C2 Qu 5

The site plan you've submitted has changed the installation boundary compared to the previous environmental permit (EPR/SP3030LZ/V002). The site plan you've submitted indicates that the installation boundary has reduced to cover the 'Unit 12' building and a portion of the 'Unit 9' building only. If you wish to reduce the size of the installation covered by the environmental permit this will require a part-surrender of your permit.

Environmental Risk Assessment

Application Form C2 Qu 6

As the non-technical summary is still not clear we are unable to assess the type of variation appropriate for your application, whether an environmental risk assessment will be required. Your recent submission of extra information reports that a risk assessment is 'Not required as per guidance' however we are not able to assess this as no reference has been made as to what guidance supports your position.

Details of emissions to Air, Water, and Land

Application Form C3 Table 2

The table stating emission points still does not reference any specific emission points as shown on your site plan. Presently the table indicates that 'Unit 9' and 'Unit 12' are emission points, however from the site plan these designations are used to describe buildings.

Additionally, there is still an unexplained increase in the number of aerial emission points shown on your recent site plan compared to your last permit. Although you have indicated that this application for a variation relates in some way to 'Unit 12' and 'Unit 9' these additional emission points will need to be assessed and included in your environmental permit.

If you've change how you operate your facility without us agreeing to the change and issuing you with a permit variation notice, you may be committing an offence and could be liable to prosecution.

Technical description of your activities

Application form C3 Appendix 2 Qu 2

No additional information was included in your recent submission to address our query in this area. It is still not clear, from the document you've used to answer this question, what benchmark emission levels your emissions have been screened against, or what technical guidance note has been used to assess any new releases. It is also unclear how the technical details included in the file "Unit 9 _ 12.doc" correspond to the process details noted in "Ipsen Process Description.doc".

OPRA Score

Application Form F1

In your email submission, you've stated that the OPRA score of 13 (as included with your initial application documents) is correct and that the score we have on file was incorrectly calculated. Further inspection of the submitted OPRA file shows that at a minimum the OPRA file submitted does not accurately describe the location and the sensitivities in the vicinity of your site (e.g. human occupation/presence). Additionally, it has been highlighted that earlier this year (June 2017) the OPRA score of 73 was agreed at a pre-application meeting between yourselves and our local NRW team (Julia Frost). The OPRA file submitted with the application should reflect the whole site prior to any variation being implemented. Should you have any queries regarding this, please speak to your local NRW team.

You may resubmit your application. We recommend that you talk to your local area office about your application before you complete it. Please call 0300 065 3000 and ask to speak to your local area office or your site officer.

We'll refund your fee separately.

If you have any questions please phone me on 0300 065 3474 or email Chris.Roscoe@naturalresourceswales.gov.uk.

Yours sincerely



Chris Roscoe
Senior Permitting Officer

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Croesewir gohebiaeth yn y Gymraeg a'r Saesneg
Correspondence welcomed in Welsh and English