

Ms. Beth Watson  
WRM Ltd  
18 Manor Square  
Otley  
West Yorkshire  
LS21 3AY

**Our ref: PAN-019901  
Other ref: EPR-AB3092ZE**

**Date: 03 March 2023**

Sent via e-mail to: [Beth.watson@wrm-ltd.co.uk](mailto:Beth.watson@wrm-ltd.co.uk)  
cc: Jennifer Price [admin@bryngroup.co.uk](mailto:admin@bryngroup.co.uk)

Dear Ms. Watson,

### **Returning your permitting application**

**Application Reference: PAN-019901**

**Operator: Bryn Power Ltd**

**Permit Number: EPR-AB3092ZE**

**Facility: Gelliargwellt Farm Anaerobic Digestion Facility, Gelliargwellt Farm, Gelligaer, Hengoed, Caerphilly CF82 8FY**

We wrote to you on 15 February 2023 asking you to send us more information before we could consider duly making your application. The response you submitted on 1 March 2023 however was incomplete, and key information is still missing from your application. Unfortunately this means your application is not duly made and we must return it to you.

You may resubmit your application. I refer you to our letter dated 15 February 2023 which contains details of the full list of information we requested. I have highlighted below the main aspects which remain outstanding, and which are required to support the application:

- **Environmental Risk Assessment**

In support of a normal variation application, NRW require you to submit an Environmental Risk Assessment (ERA) which describes the environmental risks posed by the changes you are seeking to implement. The ERA should also consider hazards and risks from the site as a whole where these may be impacted as a result of the changes proposed. The risk assessment submitted does not currently follow our guidance or provide sufficient details of nearby sensitive receptors, or consider all potential risks, such as odour, noise, bioaerosols, accidents, emissions to surface waters etc.

Please refer to the Environment Agency's guidance (which NRW also follow) on what we expect from an ERA: [Risk assessments for your environmental permit - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/risk-assessments-for-your-environmental-permit) Further detailed assessment for odour and noise may be required where risks cannot be 'screened out' in line with the relevant horizontal guidance note: [Natural Resources Wales / Horizontal Guidance](#).

Ebost/Email [Lucinda.hall@cyfoethnaturiolcymru.gov.uk](mailto:Lucinda.hall@cyfoethnaturiolcymru.gov.uk)  
[Lucinda.hall@naturalresourceswales.gov.uk](mailto:Lucinda.hall@naturalresourceswales.gov.uk)

Canolfan Trwyddedu Cymru (Caerdydd), Cyfoeth Naturiol Cymru, Tŷ Cambria, 29 Heol Casnewydd, Caerdydd. CF24 0TP  
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Gwefan/Website [www.cyfoethnaturiolcymru.gov.uk](http://www.cyfoethnaturiolcymru.gov.uk)  
[www.naturalresourceswales.gov.uk](http://www.naturalresourceswales.gov.uk)

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

- **Containment Assessment**

We note that the containment assessment report submitted is not a consolidated document, with Appendices missing from the report.

- **Technical Standards**

In support of a normal variation application, NRW require detailed information describing proposed operational control measures and monitoring to be implemented, in order to control the risk of pollution from the changes proposed to your process, in accordance with technical standards. This may include (but not be limited to) a detailed process description of the new operating envelope, P&IDs and/or drawings of new infrastructure, site drainage, updated DSEAR plans, anticipated gas yields and gas management, etc. Please refer to the NRW's guidance on what we expect from an Operational Techniques Report:

[Natural Resources Wales / Guidance to help you comply with your Environmental Permit](#)

During our recent phone call you advised of the operators intention to re-submit the application once the above information has been collated, and have requested that NRW retain the application fee, until you advise otherwise. If you wish for us to commence the process of arranging a full refund of the application fee please contact us.

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

If you have any questions please phone me on 03000 654 419 or email

[Lucinda.hall@naturalresourceswales.gov.uk](mailto:Lucinda.hall@naturalresourceswales.gov.uk).

Yours sincerely



Lucinda Hall MCIWM BSc (Hons)  
Permitting Consultant Installations and RSR Permitting Team