



Lucinda Hall
Permitting Consultant Installations and RSR Permitting Team
Permitting Centre (Cardiff)
Natural Resources Wales
Cambria House
29 Newport Road
Cardiff
CF24 0TP

10th May 2023

Dear Lucinda

Application for Variation to Environmental Permit EPR/AB3591ZQ, Maelor Foods Limited - Maelor Poultry Processing Plant, Pickhill Lane, Cross Lanes, Wrexham, LL13 0UE
Reference: PAN-020892

Further to your letter dated 27th April 2023 addressed to our Environmental Consultant, we are pleased to provide the additional information you requested to enable you to complete the Duly Made process for our application.

Accident Management Plan

In Section 10 of our application document, we explained that we have reviewed our Accident Management Plan, known in our EMS as the Environmental Emergency Response Plan (EERP). This review determined that the potential accident scenarios associated with the Phase 2 changes are unchanged from Phase 1. Our EERP is enclosed - [see DM Appendix 1](#).

Along with this, we also reviewed our environmental impacts assessments register which is enclosed with this response – [see DM Appendix 2](#).

Changes here are shown in red text, which relate to the Phase 2 project. You will note from the register sections for “Water & Land” and “Accidents & Emergencies” that this identifies that the risk levels are unchanged from Phase 1.

As regards the 2nd slaughter line, this is essentially the same as the existing and the extra chilling plant capacity will introduce no different risks and require no additional controls. Our EERP covers the potential escape of ammonia from the ammonia plant.

As regards the potential for loss of containment of a primary tank at the WWTP, the risk here will be reduced by adding a CIRIA standard concrete bund and additional hardstands at the WWTP. The existing primary tank that is corroded on the upper level above the operating level is being refurbished and a new tank is being added to meet the Phase 2 wastewater volumes. The volume of the largest tank is unchanged from Phase 1 and, despite adding a 2nd primary tank for Phase 2, it is highly unlikely that more than 1 tank will lose full containment simultaneously.

Our EERP covers large scale spillages including loss of containment at the WWTP. With the new bunding and improved containment at the WWTP, this will provide protection of the River Dee SAC and groundwater.

The EERP elements related to the other scenarios of fire and flood are also unchanged from Phase 1.

The operational Phase 1 EERP will be reviewed and updated accordingly for Phase 2 in due course, before Phase 2 is commissioned. The relevant site plans, associated drawings and documents for Phase 2 will replace the Phase 1 configurations in the operational EERP.

Noise Impact Assessment & Background Noise Survey

You asked for clarification / further information on 6 points. Please find a revised Noise Impact Assessment Report to address these - [see DM Appendix 3](#).

The revised report addresses your points below – see red text to signpost you to the relevant sections of the report or supporting comments:

1. *The baseline noise survey (doc referenced Appendix 17 - Noise complaint assessment report 2020) submitted states that it was prepared to complete an outline noise investigation following receipt of noise complaints. We require further justification as to why specific sound levels surveyed in September 2022 have been assessed against older background data from a previous noise assessment survey undertaken 3 years ago (July 2020), instead of using more recent background noise data for the same time period.*

[This is not included in the report, however, the 2022 survey was instructed only to obtain noise levels from the existing Evapco ATC plant to further inform the assessment which was issued in Revision C of the report in September 2022. The original assessment and report were issued in March 2022 and the background noise data used was under 2 years which is typically acceptable. Justification for use of the 2020 data is included in section 3.1.2 of the Report.](#)

2. *We require further justification as to why you believe data obtained whilst Covid-19 pandemic restrictions were in force is deemed to be representative of current background noise data (please refer to the above hyperlink which includes details on off-site monitoring survey requirements);* [See section 3.1.2, p7](#)

3. *Provide weather conditions at monitoring locations for the time and dates that all data measurements were taken;* [See section 3.1.4, p9](#)

4. *Provide calibration dates and certificates for equipment used for all noise measurements. Results of the field calibration should also be provided;* [See section 3.1.3, p8 and report Appendix C, p22-25](#)

5. *Provide background data measurement's distance from the proposed specific sound sources, the topography of the intervening ground. A justification for the choice of measurement locations should also be included;* [Distances of Sources to NSRs have been](#)

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included in section 5.1.3. The background survey positions are representative of these NSRs. Ground elevation data is included in the Soundplan model files. A topography drawing is not included as this is not usually a prerequisite for NIAs.

6. • *Submit the model input files used within the SoundPLAN® Model, as referenced within your Noise Impact Assessment (doc reference: Appendix 18 - Noise Impact Assessment Feb 23). See zip files – DM Appendix 4*

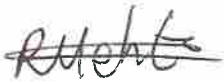
Supporting Documentation - Appendices

The appendices list in Section 14 of the main application document has now been updated and the cross references to the Appendices in the application document have been updated accordingly. Please see the revised application document in **DM Appendix 5**.

All the Appendices were submitted and numbered correctly and should now match the list in Section 14 and be referenced correctly.

We trust that this information addresses your questions fully and await your completion of the Duly Made process.

Yours faithfully



Ricky Mehta
Director

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