Permitting Service
Natural Resources Wales
Crown Buildings
Cathays Park
Cardiff
CF10 3NQ

By e-mail

2nd June 2025

Our Ref: 023-1944 WEPA - PAN-026789 NRW Response REV00

Dear Dr. Wallace,

WEPA UK Ltd – PAN-026789 (EPR/EP3738NG/V006) Response

Many thanks for your letter dated 23rd May 2025 (Ref. PAN-026789 (EPR/EP3738NG/V006). Our responses to the various questions and requests are outlined below.

1) Fire prevention and mitigation plan (FPMP)

NRW: Details and justification/supporting evidence on how you will minimise the spread of fire as an alternatives for the site not being able to meet the minimum 6 meters separation distance (as mentioned in Section 6 of your FPMP).

As stated in the FPMP (REV00) there isn't sufficient spacing within the tented area (due to the vertical supports) for 6 metres of separation. During a fire incident, the environmental protection strategy (outlined in Section 11.1.2 of the FPMP) would be followed.

WEPA appreciates that appropriate separation distances between piles of waste can prevent fire from spreading between waste piles and allow active firefighting to take place. WEPA feels that, in combination, the detection systems and provided fire suppression techniques should be sufficient to prevent the spread of fire between the stored materials.

NRW: Detail on when waste is moved to the quarantine zone – In Section 7 of your FPMP section 7 it states that the "quarantine area is where WEPA would place burning wastes to extinguish them and/or move unburnt wastes into the quarantine area to isolate them and prevent them from catching fire". Can you specify under what situations that either burning waste would be moved to the quarantine zone or unburnt waste would be moved to the quarantine zone.

In the first instance, WEPA would move burning or smouldering waste (as soon as practicable) to the designated quarantine area. A dynamic risk assessment will be undertaken before this takes place. If this is deemed unsafe the unburnt (at-risk materials) will be separated and moved to the quarantine area.

NRW: When waste is being moved during a fire, if heavy mobile plants are used to move the waste and in such situations the suitability of the mobile plants.

WEPA has the following equipment available within the storage area:

- Large bale clamp x 1 – Linde H80T Evo
- Small bale clamp x 3 – Linde H20T Evo

The following equipment can be deployed (within minutes) to the storage area:

- 360 grab x 1 – JCB 86-C Excavator
- Telehandler x 1 – JCB 541
- Loading Shovel x 1 – JCB 409
- Tractor x 1 – Case Puma 140HP
- Trailer x 1 – low loader trailer 20T

NRW: In section 6.2 of your FPMP on Fire Wall and Bays, it is mention that these are not used on site. Provide what alternatives measure you have in place to prevent the spread of fire.

As stated in the FPMP the materials (bales of paper) are stored in an industrial tent that is located on an engineered pad. WEPA appreciates that appropriate firewalls and bays can prevent fire from spreading between waste piles and allow active firefighting to take place. WEPA feels that, in combination, the detection systems and provided fire suppression techniques should be sufficient to prevent the spread of fire between the stored materials.

WEPA consulted with FM Global regarding the installation of the tented weather protection system. Barney Weston CEng MIMechE MIFireE (Senior Engineering Specialist – Assistant Vice President - Field Engineering London Operations, FM Global) confirmed that they would not require a sprinkler system below this temporary roof and that the sprinklers beneath the Department B canopy would prevent fire spread into the pulping building (i.e. would prevent fire spread into other permitted areas).

2) Air quality impact assessment

NRW: Justification for using a single background value for all of the receptors locations (for both human and habitats)

The response below is provided by David Harvey MBA BSc FIAQM (ADM Ltd).

The air quality assessment assumed a background concentration of 7.8 µg m^{-3} for nitrogen dioxide (NO_2) and 10.1 µg m^{-3} for the oxides of nitrogen (NOx). These values are DEFRA estimated concentrations for the 1 km grid square closest to the installation (287500,187500). These were DEFRA estimates for 2024.

The DEFRA estimated concentration for other 1 km grid squares will vary, as will the estimates for future years (e.g. 2025 or 2030).

It is considered that the use of a single background concentration is justified for this assessment for the following reasons.

- The concentrations used are higher than any of the 8 adjacent 1 km grid squares (see below)
- Given that the largest PEC was 9.2 µg m^{-3}, which is 23% of the EAL, even if the background was substantially in error (e.g. if the actual background was twice the value used of 7.8 µg m^{-3}), the PEC would still be less than 50% of the EAL and still insignificant.
- The clarity and quality of the assessment would not be improved by including numerous different estimates of background concentrations (for different locations and for different years).
- It is recognised that the background concentration will vary over the modelling domain (both spatially and with time). Detailed consideration of the background concentration is not warranted for an assessment where the background can vary by +/- 100% of the selected value and not affect the significance of the impact.

X	Y	NO2
286500	186500	5.20
287500	186500	5.36
288500	186500	5.53
286500	187500	5.32
287500	**187500**	**7.82**
288500	187500	5.56
286500	188500	5.59
287500	188500	5.77
288500	188500	5.54

NRW: Provide process contribution for nitrogen deposition and acidification for the habitat receptors.

It is considered that where the PC and PEC of the oxides of nitrogen (NOx) can be screened out as insignificant, which is the case for this assessment, there is no requirement for the calculation and assessment of nitrogen deposition and acidification.

The calculated process contribution (PC) for nitrogen deposition and acidification for the habitat receptors are shown below.

The calculations assume woodland deposition velocity for all receptors (0.003 m/s). Although not detailed, it is considered that the process contributions for nitrogen deposition and acidification for the habitat are insignificant.

	Process Contibution (PC)			
	NOx	NOx	N	Acid
Receptor	Conc. (µg/m3)	Dep. (µg/m2/s)	Dep. (kg N/ha/year)	Dep. (keq/ha/year)
E1	0.33	0.0010	0.09	0.007
E2	0.36	0.0011	0.10	0.007
E3	0.38	0.0011	0.11	0.008
E4	1.06	0.0032	0.31	0.022
E5	0.15	0.0005	0.04	0.003
E6	0.15	0.0005	0.04	0.003
E7	0.12	0.0004	0.04	0.003
E8	0.01	0.0000	0.00	0.000
E9	0.01	0.0000	0.00	0.000
E10	0.02	0.0001	0.01	0.000

3) Noise impact assessment

NRW: Provide more information on the noise impact assessment in order that it fully meets the requirements of BS4142 and the environmental agencies guidance Noise and vibration management: environmental permits - GOV.UK and the method implementation document Method implementation document (MID) for BS 4142 - GOV.UK. This includes but not limited to, the additional information on:

Background noise measurements: Sections 4.3, 5.1 and 5.21 reference that the background came from a previously accepted noise impact assessment. Provide the following;

Confirmation the report reference and the date of the report was made and submitted to Natural Resources Wales.

Dates and weather conditions when the background noise data was gathered.

Details on measurement equipment including calibration and serial number (if in a previous noise impact assessment please reference the relevant section of that report).

Justification why the background data used in the previous noise impact assessment report is representative of the current background. Any assessment and conclusions in the modelling should outline how any potential changes to the area that could change the background has been considered.

The response below is provided by Stuart Berry BSc (Hons), MSc, MIOA (Entran Ltd).

The background sound levels are adopted from the existing permit (EPR/3738NG/V005, duly made 24/08/21) and associated noise assessment (SLR Ref No:425.09898.0001, attached). The requested details are presented within this assessment.

The previously identified background sound levels were approved as part of the previous application, and it is therefore appropriate to adopt these levels for future assessment. Additionally, these levels would have been made in the absence of the previously proposed, and now existing, operational activity, which makes these levels more suitable for the purposes of the revised assessment.

NRW: Statement confirming if the noise impact assessment and modelling was carried out by a person who had the required competency/qualification to undertake the assessment.

The assessment was undertaken by Stuart Berry, who is a Principal Consultant with 15 years of experience in environmental noise and vibration impact assessment for a range of project

types, including planning and permitting for large-scale commercial and industrial sites. Stuart holds an MSc in Environmental and Architectural Acoustics and is a Member of the Institute of Acoustics.

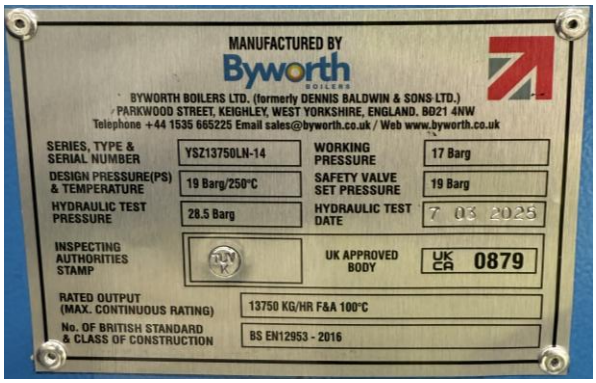
NRW: Description in the report of the operational times and activities of the proposed combustion units.

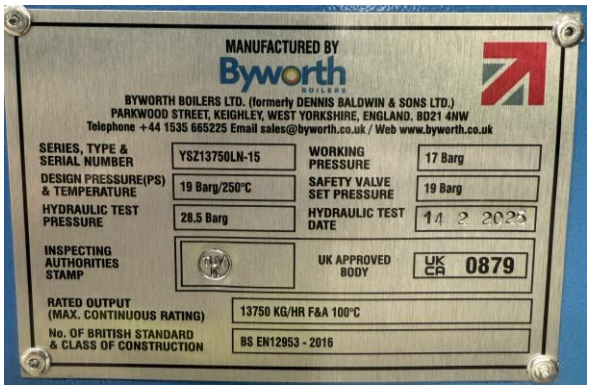
The assessment considers the continuous operation of the boiler house, and the assessment is made accordingly. Specific levels have been calculated and assessed against the daytime and night-time background sound levels.

4) Other Information

NRW: Provide us with more information on the Form Part C3 appendix 8 question 1 –the serial numbers for both of the Medium Combustion Plants. There was only one serial number provided in the application form.

The requested modification has been made. The revised form C3 is attached. The specific MCPD equipment plates are provided below.





I trust that the above is satisfactory, but if you have any queries on this matter, please do not hesitate to contact me.

Yours sincerely,

Michael Sylvester
EAME Manager