

Hi Paul,

Thanks for your email, I have discussed your queries with our permitting team and our response can be found below (green text).

Kind regards,

Stuart

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**From:** Paul Wright <\_\_\_\_>  
**Sent:** 29 January 2024 13:40  
**To:** Ross, Stuart <\_\_\_\_>  
**Cc:** Vicky Morris-Jones, SML <\_\_\_\_>  
**Subject:** NRW pre-app meeting

**Rhybudd:** Deilliodd yr e-bost hwn o'r tu allan i'r sefydliad. Peidiwch â chlicio dolenni, atodiadau agored nac sganio codau QR oni bai eich bod yn cydnabod yr anfonwr ac yn gwybod bod y cynnwys yn ddiogel.

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Hi Stuart,

Good to see you on Friday morning and thanks for the open nature of the discussions.

We'd appreciate your thoughts and guidance on the following issues we discussed:

- Site Condition Report – we will submit a SCR if the permit variation is to include the additional expansion land. However, our question at this time is, do we need to update the SCR for the existing main site due to the extensive groundworks which have been undertaken recently as part of the demolition and construction phase?  
You did suggest that this may be addressed by way of an Improvement Condition in any issued permit?

We would expect to see an SCR submission with the variation application, however this can be an addendum to the current report if there is no change to the installation boundary. It is recommended that an addendum includes but is not limited to an overview of the work that has been completed as part of this redevelopment with a commitment to fully update the SCR within a suitable time period.

- Applicable BRefs – I suggest we would include an assessment against the following BRefs as part of the application:

- Production of Pulp, Paper and Board
- Waste Incineration
- Waste Treatment
- Large Combustion Plant – you queried if IED Chapter III is applicable:
  - This Chapter shall apply to combustion plants, the total rated thermal input of which is equal to or greater than 50 MW, irrespective of the type of fuel used.
  - Where the waste gases of two or more separate combustion plants are discharged through a common stack, the combination formed by such plants shall be considered as a single combustion plant and their capacities added for the purpose of calculating the total rated thermal input
  - installed in such a way that, taking technical and economic factors into account, their waste gases could in the judgement of the competent authority, be discharged through a common stack, the combination formed by such plants shall be considered as a single combustion plant and their capacities added for the purpose of calculating the total rated thermal input.

So my interpretation is that Chapter III would apply?

Yes, as the net rated thermal input of the combustion plant >50MWth (as indicated in the attached email) then Chapter III of the IED will apply to those units. Where units with a net rated thermal input of <50Wth exist the capacity aggregation and stack rules as detailed above should be applied.

- FPMP – we propose to submit a single consolidated site wide FPMP as part of the variation application.  
We have no objection to this approach – refer NRW Guidance Note OGN16.  
[Guidance No. 16 Fire prevention and mitigation plan - waste management \(naturalresources.wales\)](#)
- Global Warming Potential assessment – is one required for the CHP?  
The application will require a GWP assessment for the CHP – refer to the link to this assessment on the gov.uk website. ~~Please note however the link on the page to the Welsh guidance does not work.~~  
[Assess the impact of air emissions on global warming - GOV.UK \(www.gov.uk\)](#)
- Noise & vibration plan – review baseline measurement requirements.  
Refer Noise and Vibration Management Plan Guidance  
[Noise and vibration management: environmental permits - GOV.UK \(www.gov.uk\)](#)

As discussed, it is important that background sound level data are representative, older data may not be accepted if this cannot be demonstrated. The guidance provides information on deriving background sound levels.

Again as discussed, please note the following point (as copied from the guidance) –

*‘When you apply for a variation, do not include noise from the existing site (before changes) as part of the background or the residual sound levels. Your noise impact assessment must consider all the noise resulting from the proposed variation – the existing site and the variation together. Show both components clearly and then add them together to give a new total for site noise at the receptors. The impact assessment will be based on this new value, known as the ‘specific level’ in BS 4142.*

Regards,  
Paul

**Paul Wright** (he/him/his)

CEnv, CEng, MSc

European Industry Business Sector Leader

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SLR Consulting Limited  
5th Floor, 35 Dale Street, Manchester United Kingdom M1 2HF



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**Paul Wright** (*he/him/his*)

CEnv, CEng, MSc

European Industry Business Sector Leader

**O** +44 3300 886631

**M** +44 7786 808408

**E** [pwright@slrconsulting.com](mailto:pwright@slrconsulting.com)

SLR Consulting Limited  
5th Floor, 35 Dale Street, Manchester United Kingdom M1 2HF



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