Notice of request for more information
Environmental Permitting (England and Wales) Regulations 2016

Notice requiring further information

To: Company Secretary
Kronospan Limited
Maesgwyn Farm
Chirk
Wrexham
LL14 5NT

Application number: PAN 024285

Natural Resources Wales, in exercise of its powers under paragraph 4 of Part 1 of Schedule 5 of the above Regulations, requires you to provide the information detailed in the attached schedule. The information is required in order to determine your application for a permit, duly made on **15 November 2024**. The information requested should be sent to the following address by **18 December 2025.**

Information should be sent to:

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

Name	Date
Karen Dunn	**06/11/2025**

Authorised on behalf of Natural Resources Wales

Ffôn/Tel 0300 065 3232
Ebost/E-Mail **Karen.Dunn**@cyfoethnaturiolcymru.gov.uk
Karen.Dunn@naturalresourceswales.gov.uk

Schedule

1. Table 6.1 and 6.2 of the submitted NVC report provides predictions using ISO9613:1996 and ISO9613:2024 (in blue), however in Table 6.4: Cumulative Effect of Existing Contextual Noise from Kronospan, only the ISO9613:1996 data has been carried forward for the full BS4142 assessment, the predictions using ISO9613:2024 have not been considered further, the consultant states: *"Noise levels have been predicted based on ISO9613-2:1996 methodology using computer-based software and appropriate input settings. For consistency, the 1996 version of ISO9613-2 has been included on a wide range of impact assessment noise prediction modelling at Kronospan since 2011. The 1996 version is considered by the author of this assessment to provide good accuracy based on numerous industrial project verification studies over the last 20 years. The 2024 version should provide similar results but current experience using the modelling software shows in-consistency and over-prediction on re-runs of 1996 version models. As NRW have requested calculations based on the 2024 version for the latest schedule 5 notice, we have included this in the tables for a quantitative comparison. The results show a significant over-estimation of noise levels, which is a point that has been raised as a concern to NRW, and by other Acoustic Consultants to the EA and Institute of Acoustics since its release in 2024."* It should be noted that the IOA (Revision of BS standard for attenuation of sound during propagation outdoors | Institute of Acoustics) states "*This new standard, BS ISO 9613-2 2024, contains updated technical guidance, and cancels and replaces the first edition - ISO 9613 -2:1996*". The introduction to ISO 9613-2:2024 also states that "*This version includes the modifications developed for reasons of quality assurance if the method is implemented in software as described in ISO 17534-1[6] and ISO/TR 17534-3[7] and some improvements to make the applied strategy fit for broad software-based application*." We therefore do not accept the consultant's justification for not using the ISO 9613-2:2024 predictions in the full BS4142 assessment, and the consultant should submit a revised Noise Impact Assessment updated to present predicted impacts using the current version of the ISO standard.

2. We cannot match the values in the modelling files to those presented in the tables in the submitted reports, the consultant has only submitted .qsi files from Spectrums iNoise modelling for existing site noise. CadnaA noise modelling files for the proposed variation that include the changes made to the modelling as a result of the last Schedule 5 notice have not been included in this submission. The consultant should therefore provide both the iNoise and CadnaA files (not just .qsi files), using the ISO9613:2024 methodology and provide a full explanation of the specific sources included in the models and their exact location as required by current guidance (Noise impact assessments involving calculations or modelling) available on www.gov.uk.

Ffôn/Tel 0300 065 3232
Ebost/E-Mail Karen.Dunn@cyfoethnaturiolcymru.gov.uk
Karen.Dunn@naturalresourceswales.gov.uk

Gwasanaeth Trwyddedu, Cyfoeth Naturiol Cymru, Adeilad y Goron, Parc Cathays, Caerdydd, CF10 3NQ
Permitting Service, Natural Resources Wales, Crown Buildings, Cathays Park, Cardiff, CF10 3NQ

Gwefan/Website www.cyfoethnaturiolcymru.gov.uk
www.naturalresourceswales.gov.uk

3. Table 6.4 states that for Column 1 *(Predicted Existing Specific Kronospan Noise Level LAeq,T dB),* values have been taken from *'Spectrum Technical Document CJA4941/23241',* however, the values in Column 1 match the values in Table 5.1 (Predicted Existing Kronospan Site Noise Levels at NSR), which states that the levels are taken from the *'Spectrum report ref. CJA4831/23241/Rev2'*. The consultant should clearly state the source of all data (noise source sound power/pressure, predicted impacts at receptors etc.) presented in tables in the submitted report.

4. There are discrepancies between values listed in Table 5.1 and the values presented in the Spectrum report (*ref. CJA4831/23241/Rev2*). The consultant should review the latest submitted report and clarify any discrepancies between data presented in the report and the indicated data source(s).

5. In addition to point 3 above, please provide the *'Spectrum Technical Document CJA4941/23241',* as this has been referenced in the submitted NIA.

6. Point 6 of the recent Schedule 5 stated: *"The applicant should provide predicted sound pressure levels at identified sensitive receptors for all representative floor heights during both daytime and night-time receptors, unless the consultant can satisfactorily justify otherwise. Note: Guidance states: "The term 'outside a building' does not just apply to external gardens or land, it applies to balconies and outside any room where occupants would expect or need quiet – studies, bedrooms, sitting rooms. If there is no clear evidence that a room is unoccupied, you must presume that it is, for example an attic window." Published guidance sets the expectation that the applicant provides background sound levels for all assessed receptors that exclude contribution from existing site. Where it has been demonstrated that is not reasonably practicable to achieve this via measurement at receptor locations, the applicant should consider using surrogate/proxy measurement locations."* However, for the proposed variation modelling, specifically column 2 in Table 6.2 is titled: "*Predicted Specific Noise Level from Site (ISO 1996) LAeq15mins dB [ISO 2024] 1.5m AGL".* Whereas in later tables (Table 6.4 and 6.5), the night-time prediction is labelled as 4m. The consultant should clarify this.

7. Table 6.5 contains numbers 1-7 indicating footnotes associated with the information, however, no footnotes appear to be associated with this table in the submitted NIA.

End of Schedule.

Ffôn/Tel 0300 065 3232
Ebost/E-Mail Karen.Dunn@cyfoethnaturiolcymru.gov.uk
Karen.Dunn@naturalresourceswales.gov.uk

Gwasanaeth Trwyddedu, Cyfoeth Naturiol Cymru, Adeilad y Goron, Parc Cathays, Caerdydd, CF10 3NQ
Permitting Service, Natural Resources Wales, Crown Buildings, Cathays Park, Cardiff, CF10 3NQ

Gwefan/Website www.cyfoethnaturiolcymru.gov.uk
www.naturalresourceswales.gov.uk