

**Ms Vicky Morris-Jones (cc Paul  
Wright of SLR Consulting limited)  
Shotton Mill Limited  
Shotton Paper Mill  
Weighbridge Road  
Shotton  
Deeside  
Flintshire  
CH5 2LL**

**Our ref: PAN-029803  
(EPR/BT4885IT/V015)  
Your ref: EPR/BT4885IT**

**Date: 29/01/2026**

Dear Ms Morris-Jones

**We need more information about your application**

**Application reference: PAN-029803 (EPR/BT4885IT/V015)  
Operator: Shotton Mill Limited  
Facility: Shotton Paper Mill, Weighbridge Road, Shotton, Deeside, Flintshire, CH5 2LL**

Thank you for your application fully received on 22/12/2025. We need to ask you for some more information before we start our determination.

**1. Air quality impact assessment**

- a) Critical load – Assess the air emission features against the relevant critical loads as outlined on Air pollution inventory system (APIS link here: [APIS app | APIS](#)). *Reason – Since the planning advice in 2021, the critical loads for some features (such as Atlantic salt meadows) have been revised. The air quality impact assessment needs to be assessed against the current critical loads.*
- b) Habitats receptors – Provide the grid reference for the location of the maximum impact for all habitat sites.
- c) In combination assessment – Along side the sites you have already identified we have identified the following sites that will need to be considered in the in combination scope;
  - I. Deeside Power (permit variation PAN-028461) – Variation to add in new gas turbine in place of the original power station.
  - II. Deeside SPV PAN-028894 (a permit application for a new bespoke permit for

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and anaerobic digestion plant located east of Shotton Paper Mill)

A copy of the application documents for these site can be found on [our public register](#) (using the PAN reference).

- d) Local wildlife site – There is one local wildlife site (Shotton Steelworks) located adjacent to the papermill (located on the south boarder). The air emissions impacts (atmospheric concentration and deposition) would need to be calculated for this site as this is within the screening distance ([Air emissions risk assessment for your environmental permit - GOV.UK](#)).
- e) Provide contour map of the impact of emissions (oxides of nitrogen concentration and nitrogen deposition). *Reason - contour maps of the impact pathways will help show where in-combination overlap with other sites could occur.*
- f) Provide Assessment for air quality impacts under abnormal operating conditions *Reason – this is a standard requirement for waste incinerator/co-incinerator plants.*

## 2. Waste

- a) Outline the EWC waste codes for the wastes that are to be used for the Containerboard Process *Reason – currently the permit lists EWC codes allowed for waste incineration, recycling facilities and the use in news paper print but does not include one for containerboard manufacturing process.*
- b) Provide an updated version of the waste acceptance procedures and waste acceptance criteria including any changes to these procedures as a result of the changes on site.

## 3. Noise impact assessment

- a) Provide the competency/qualifications of the people who undertook and wrote the noise impact assessment and noise monitoring.
- b) The noise impact assessment identified NSR3 as one of the nearest noise sensitive receptors. However there appears to be new housing under construction to the east of that receptor. As outlined in section 8.5 of the method implementation document [Method implementation document \(MID\) for BS 4142 - GOV.UK](#) you should include proposed new noise sensitive receptors including anywhere planning permission has been granted.
- c) Provide a brief justification why the median value for LA90 was used as a representative value for background.
- d) Provide evidence of weather conditions that is representative of all locations and consider any uncertainties in the impact assessment. *Reason - Section 4.4 of the noise impact assessment includes the detailed weather for one location (location 1), despite being up to 4.7 km away from the other measure location (such as location 3).*

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#### 4. Biomass plant

- (a) In the application form C3 table 1a, you specified the limit of the waste incineration as 85 tph but in the most recent consolidated permit (V013) the limit of specified activity (table S1.1) specifies 85MW and 57 tph. Can you either;
- Confirm if table 1a was supposed to read 85 MW.
  - or
  - If the current waste tonnage has increased to 85 tph from 57 tph, revise all relevant documents (Best available techniques and air quality impact assessment) to reflect the increased throughput.
- b) In addition to BAT, we will also require assessment on how the site complies with Chapter IV and Annex VI of Industrial Emissions Directive 2010/75/EU.

#### 5. Management plans

##### 5.1 Environmental management system

BAT 1 of the Waste treatment BRef - ISO 14001 accredited alone will not meet all requirements of BAT 1 such as following cleaner technologies, whole life plan consideration, regular sectoral benchmarking. Please review BAT 1 and provide additional information on how the EMS will meet these requirements of BAT 1.

##### 5.2 Accident management plan

Provide a preliminary accident management plan or a more detailed summary on the changes to the plan.

#### 6. Fire prevention and mitigation plan (FPMP)

- a) Any details on location of hazardous materials stored such as gas cylinders, oil or fuel tanks.
- b) Provide alternative measures to monitor baled waste for heat. *Reason: Alternative monitoring and/or other arrangements are needed to justify not monitoring temperature or moisture of baled waste other than the statement provided section 2.4.2 of the FPMP "Bales are stored for less than 6 months therefore probing for temperature and moisture is not deemed necessary".*

#### 7. Effluent treatment plant

Provide more details on how the Supervisory Control and Data Acquisition system (SCADA) will achieve the requirements of BAT 38 of the waste treatment BRef.

Please reply within 10 working days from the date of this letter. If we don't hear from you we must return your application and fee. We will keep 14% of the charge to cover the cost of the assessment work done.

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If you email or write to us please quote the application reference **PAN-029803 (EPR/BT4885IT/V015)** on any correspondence and send it to the relevant address below.

When we receive the missing items we'll continue to check the details in your application. If there's enough there for us to begin the process of deciding whether or not we can grant your application we say the application is 'duly made' and we'll let you know this by letter.

Please quote our reference if you contact us. If you have any questions please phone me on 0300 065 4448 or email [william.wallace@naturalresourceswales.gov.uk](mailto:william.wallace@naturalresourceswales.gov.uk).

Yours sincerely

**William Wallace**  
**Senior Officer, Installation and RSR Permitting.**

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