

OGN 200 Form 1A

Record of a Habitats Regulations Assessment

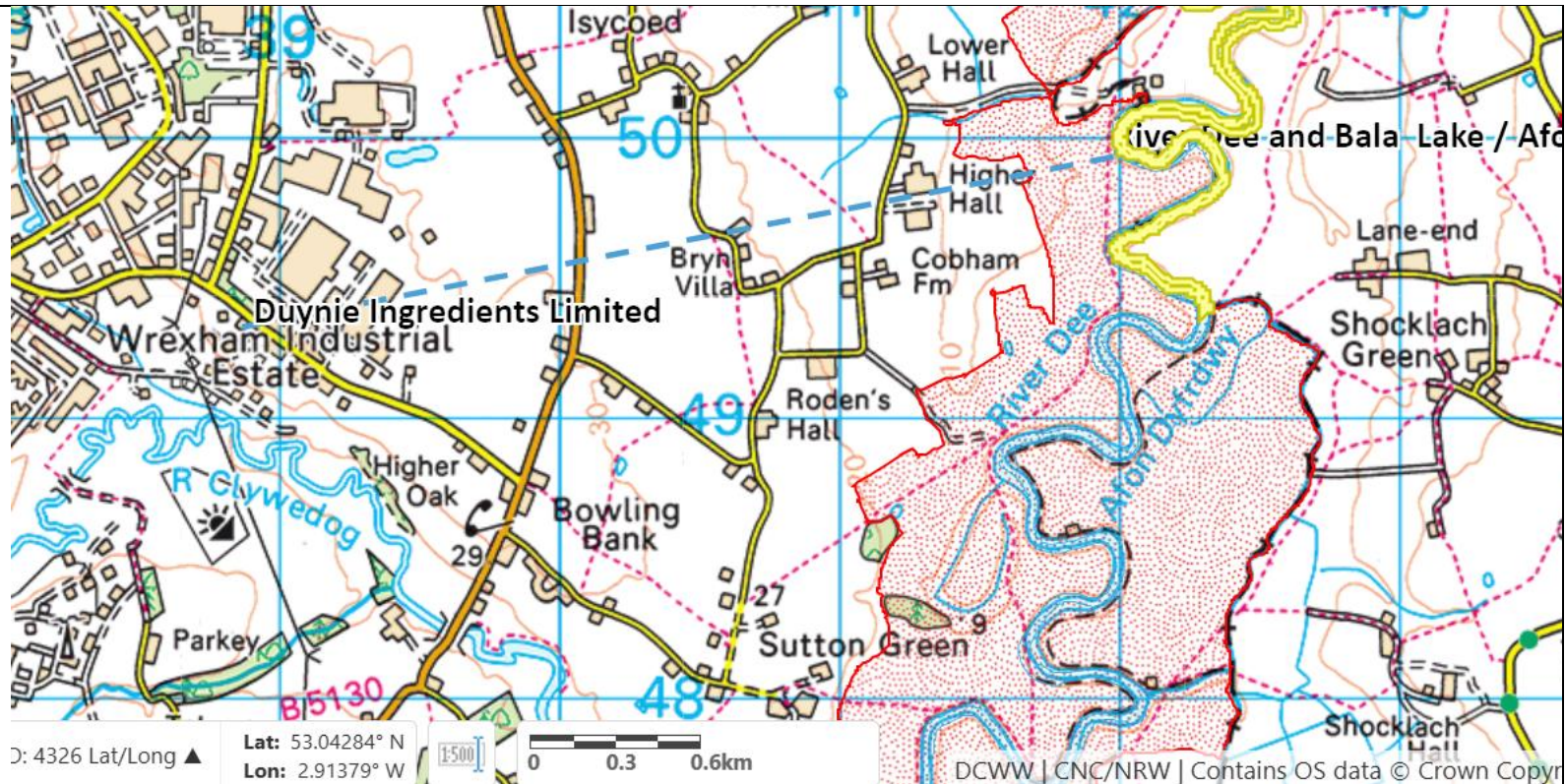
Plan or project name, brief description or application reference number	PAN - 025487
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HRA iteration/version	1.0
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1. Plan or Project Details

Information about the plan or project		
1	Date application received	Application Duly Made 09/04/2025
2	Applicant details	Duynie Ingredients Limited
3	NRW team responsible for carrying out, or requiring to be carried out, the plan or project, and name of lead officer	N/A
4	Activity/ies proposed	<p>Duynie Ingredients Limited are applying for a new bespoke permit for the modification of starch. The facility has been operating since 2007. Following a visit by NRW officers the operator was instructed to submit an application for a permit in order to comply with the Environmental Permitting (England and Wales) Regulations 2016. This application is to add:</p> <ul style="list-style-type: none"> • Two existing medium combustion plant (MCP) on site which must meet the requirements of the Medium Combustion Plant Directive (MCPD) by 1 January 2030. One is a backup boiler and is only used when the main boiler is non-operational due to maintenance or break down. Both have been in operation at the site since approximately 2007. • It is proposed to install a combined heat and power (CHP) plant to generate electricity and heat for use at the Site in the future. It will be classed as a Medium Combustion Plant and when installed will be required to meet the requirements of the MCPD • Any emissions of dust from the dryers on site will be controlled by the emission limits set in Schedule 3 of the permit.

	<p>The applicant has carried out detailed air dispersion modelling to assess the impact of oxides of nitrogen (NO_x) and Sulphur Dioxide (SO₂) from these three MCP's, which have shown a potential impact from nutrient nitrogen deposition and acidification on the following European sites:</p> <p>Special Areas of Conservation (SAC):</p> <ul style="list-style-type: none">• Johnstown Newt Sites UK0030173 (SAC) approximately 8km from the regulated facility• River Dee and Bala Lake / Afon Dyfrdwy a Llyn Tegid (Wales) UK0030252 10000 (SAC) Located approximately 3km from the regulated facility• River Dee and Bala Lake / Afon Dyfrdwy a Llyn Tegid (England) UK0030252 10000 (SAC) Located approximately 3km from the regulated facility <p>Ramsar Sites:</p> <ul style="list-style-type: none">• Midland Meres & Mosses Phase 2 (Wales) UK11080 Located approximately 5km from the regulated facility <p>The conclusion of the detailed assessment confirms that the results indicated that emissions from the facility would not significantly affect existing conditions at any designation.</p> <p>Please see the map below which confirms the location of the nearest European site, River Dee and Bala Lake is approx. 3km away:</p>
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5	Relevant legislation or statutory basis	Environmental Permitting (England and Wales) Regulations 2016 Industrial Emissions Directive 2010 (IED) Medium Combustion Plant Directive (MCP)
6	Location	NRG: SJ 32056 69754. Site address: Duynie Ingredients Limited, Coed Aben Road, Wrexham Industrial Estate Wrexham, Clwyd, LL13 9UH
7	Plan or project documents, including any application documents	Internal see DMS folder: PAN-025487 . External see Public Register: Public register - Customer Portal

8	Environmental Statement	N/A
9	Pre-application correspondence	N/A
10	NRW team responsible for preparing this HRA report, and lead officer	Emma Smith Permitting Officer Installation and RSR permitting, Permitting Service
11	Team or person responsible for approving the plan or project (competent authority role)	Installation and RSR permitting, Permitting Service

2. Determining the need for a Habitats Regulations Assessment

<p>2.1 Is there any possibility that the plan or project could negatively affect any European sites?</p>	<p>NO. Although the proposed and existing boilers would result in emissions to air, they are not within screening distance of the European sites. The only impact pathway to the SAC's and Ramsar from the proposal is emissions of NOx, and SO2 to air from the boilers. The two existing boilers are 1.634MWth and 1.1MWth and use natural gas as the fuel. The relevant screening distance for natural gas of combustion units of this size is 750 meters. As such the SAC's and Ramsar sites are outside of the screening distance for emissions from the boiler and therefore there is no impact pathway due to size and scale of the boiler. The proposed boiler will be 1.363MWth and will also use natural gas as the fuel. The relevant screening distance for natural gas of a combustion unit of this size is also 750 meters. As such the SAC's and Ramsar sites are also outside of the screening distance for emissions from the boiler. There is no impact pathway due to size and scale of the boiler.</p> <p>See the following for screening distances: Natural Resources Wales / What to do before you apply for a standalone Medium Combustion Plant (MCP) permit between 1 and less than 20 MW thermal input</p> <p>See map on page 4 which confirms the distance to nearest European site is approximately 3km.</p> <p>With regards to dust emissions, as the nearest European site is approximately 3km from the installation, there is no impact pathway. There is no possibility that dust from the facility could negatively affect any European sites stated above.</p>
<p>2.2 Is the whole of the plan or project directly and only connected with or necessary to the management of one or more European sites, for the purposes of conserving the habitats or species for which the European site(s) is/are designated?</p>	<p>NO</p>
<p>2.3 Is there a possibility that the plan or project could affect any other feature of the European site(s) concerned, or of another European site, in a way that would undermine that feature's conservation objectives?</p>	<p>NO</p>

6. Conclusion

<p>HRA is not required because there is no conceivable impact on any European sites. (As documented in section 2.1)</p>	<p>Y</p>
<p>HRA is not required because the whole of the plan or project is directly connected with or necessary to the management of one or more European sites, for the purposes of conserving the habitats or species for which the site(s) is/are designated, <u>and</u> the plan or project is not likely to have a significant effect on any other European sites. (As documented in section 2.2 and 2.3)</p>	
<p>This project is a renewal of a current permission which complies with NRW agreed criteria for ruling out likely significant effects of a renewal without conducting a project-specific LSE test. Therefore, it is considered not likely to have a significant effect on any European sites, either alone or in-combination with other plans or projects. (As documented in section 3.1 of this form)</p>	
<p>The plan or project has been screened for likelihood of significant effects and is considered not likely to have a significant effect on any European sites. (As documented in section 3.2 of this form, and section 5 if applicable)</p>	
<p>In light of the conclusions of an appropriate assessment it has been established that the plan or project will not adversely affect the integrity of any European sites, taking into account any conditions or restrictions as applicable, either alone or in-combination with other plans or projects. (As documented in section 4 of this form, and section 5 if applicable)</p>	
<p>In light of the conclusions of the appropriate assessment, it has <u>not</u> been ascertained that the plan or project will not adversely affect the integrity of any European sites, as documented in section 4 of this form, and section 5 if applicable. Approval for the plan or project <u>cannot</u> be given unless either:</p> <ul style="list-style-type: none"> • the plan or project specification, and/or the terms under which it might be approved, are modified so as to remove the risk of adverse effects, and a revised HRA is prepared, or • the plan or project (not being an SSSI consent*) satisfies the requirements for a derogation and a Derogation Notice is prepared and submitted for consideration by the appropriate authority, normally Welsh Ministers <p>(*SSSI consents cannot be given as derogations)</p>	
<p>Signed: Emma Smith</p> <p>Name: Emma Smith Position: Permitting Officer</p> <p>Date: 23/04/25</p>	
<p>Was this HRA conclusion an escalated decision? YES or NO</p>	<p>No</p>

7. Consultation with the ANCB and how sections 2, 3, 4 and 5 of this HRA report (as applicable) take into account that advice.

Relevant section of the HRA report	Correspondence and/or meetings with the ANCB	Description of how the comments from the ANCB have been taken into account
2		
3		
4		
5		

8. Countersignature

I have reviewed the HRA documented in this form and confirm that I agree/do not agree with the conclusion recorded in section 6.

Additional comments (if any):

Signed:

Name:

Position:

Date: