

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

## Notice requiring further information

To: **Mr Michael John Davies**  
**The Royal Mint Ltd**  
**Llantrisant**  
**Pontyclun**  
**Rhondda Cynon Taf**  
**CF72 8YT**

Application number: **PAN-028118**

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 27/11/2025. The information requested should be sent to the following address by 11/03/2026.

Information should be sent to:

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

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Correspondence welcomed in Welsh and English

Name	Date
<b>Christopher Betteridge</b>	18/02/2026

Authorised on behalf of Natural Resources Wales

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## Schedule

### Fire Prevention Management Plan (FPMP)

Within the questions below when we say 'Our FPMP guidance' we are referring to Natural Resources Wales (NRW) Guidance hosted on the NRW website, available at [Natural Resources Wales / Fire prevention and mitigation plans](#). We have structured this Schedule 5 notice in accordance with the FPMP guidance numbered sections. Please note that where the guidance states "consider", we would accept these aspects being addressed in an appendix to the FPMP, if they are not being incorporated as actions in the main body of the FPMP.

### Section 5 – What to include

#### 1. **ACTION: Update your FPMP to meet the requirements of Section 5 of our FPMP guidance in its entirety.**

Specific actions include, but are not limited to:

- Confirm the maximum total amount of waste and the types and forms stored on site at any one time.
- Confirm how printed circuit boards (PCBs) removed from WEEE are stored, prior to their removal off site. The FPMP guidance states that the FPMP must describe how waste will be stored and managed. The FPMP states that batteries and PCBs will be processed and removed as quickly as possible. The FPMP provides an adequate explanation of how batteries will be removed and stored, however there is no adequate explanation of how PCBs will be removed and stored.
- State the maximum length, width, and depth of the waste piles. The FPMP guidance states that the FPMP must provide the maximum size of any waste pile, including the length, width and height. You could provide this in a table or by labelling piles on the layout drawings.
- Describe all combustion products and emissions (to air, land and water) from the fire and the emergency response. Include the impact on the community, critical infrastructure and the environment, and how they will be minimised.
- Provide site plans to show all the information that must be included under the heading "Site plans and maps" in Section 5 of our FPMP guidance. Although the FPMP and annexes and appendices submitted denote much of this information, all of this information is required in order for NRW to be able to determine this variation application. Ensure that the following areas are addressed in the update:
  - Layout of all buildings storing waste are included (including access points, fire exits & location of utilities, including isolation points). The layouts of the waste stockpiles within buildings must also be provided.

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- Areas where hazardous materials are stored or processed (location of gas cylinders, chemicals, stacks of combustible materials, oil and fuel tanks)
- Separation distances and how these separation distances are monitored
- Areas of permeable or impermeable ground
- Areas of natural or unmade ground
- Any groundwater vulnerability zones
- Location of plant, protective clothing and pollution control equipment and materials
- Location of “off- site” emergency information pack with site plan
- Firewater containment system
- Compass rose showing north and the prevailing wind direction
- Assembly point for staff and visitors to site

## Section 6 – Manage common causes of fires

2. **ACTION: Update your FPMP Table 5.1 to consider cylinders stored at site as a potential cause of fire and provide details of the risk and mitigation. Ensure storage locations are located on the site plan. This is required by Section 6 of our FPMP guidance.**

## Section 7 – Managing waste

3. **ACTION: Update your FPMP to meet the requirements of Section 7 of our FPMP guidance in its entirety.**

Specific actions include, but are not limited to:

- Include a clear area around the perimeter of the site. This clear area must be available at all times and identified on your site plan. Our FPMP guidance notes that: *the clear area can vary depending on the layout of your site and permitted stack sizes in accordance with the separation distances.*
- Show that the fire prevention principles listed in section 7 of our FPMP guidance under the heading “Self-Combustion” have been considered, with explanation of why each principle has been incorporated into your FPMP, or why it has not. For any wastes stored on site credibly identified as capable of self-combustion, ensure that they are stored in line with the maximum storage times stated.
- Ensure separation distances to building walls meet minimum distances as specified in Section 7 of our FPMP guidance.
- Confirm that all escape routes, fire exits, alarm call points and fire extinguishers are kept clear and free from waste at all times.
- Confirm electrical equipment and heaters are kept free from waste, including dust and packaging materials.

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- Confirm that waste storage areas are fire compartmented away from office areas.
- Confirm that waste storage areas have some means of clearing smoke from the building, such as openable skylights or roller shutter doors, to aid firefighting.
- Explain the procedure of how, in the event of a fire, you will move containers as soon as is reasonably practicable in a safe manner to prevent the fire spreading.
- Confirm location/s of occupied buildings and high-asset value equipment and plant.
- Confirm that escape and evacuation routes around your site and within buildings are not compromised by the stack layout.
- Explain the vehicle movements on site and designated routes.
- Provide a technical assessment that shows you have confidence that your proposal will be viable in foreseeable market conditions. This should prove the suitability of materials, the resilience of the supply chain and end user outlets.
- Explain how staff are trained to detect hotspots. Hotspots are a precursor to potential fire, and their early detection can reduce the fire risk considerably. The detail of how staff are trained to detect hotspots can either be provided in the main body of your FPMP or as a procedure supplied as an appendix.
- Detail the equipment used to detect temperature and moisture content. You must also explain what indicators will be used in relation to temperature and moisture content and the escalation of actions in relation to these indicators. The equipment used must be capable of operating at any depth throughout the pile. I.e., if a 4m deep stack is proposed, the probe must be capable of operating the depth of the proposed stack.

## **Section 9 – Fire suppression**

- 4. ACTION: Update your FPMP to include consideration of the following automatic detection system:**
- **spark, UV and infrared detection**

**Also update your FPMP to include consideration of the following fire suppression systems:**

- **sprinklers**
- **manual open deluge systems**
- **deluge/water spray systems**
- **water monitor/cannons/curtains**

**This consideration is advised by Section 9 of our FPMP guidance.**

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Provide an explanation of why each system is appropriate or not for this installation. Ensure that the design, installation and maintenance of all your automated suppression equipment is covered by an appropriate UKAS-accredited third-party certification scheme. Planning and building regulations may also apply depending on the size of your building.

## **Section 10 – Firefighting strategy**

### **5. ACTION: State the firefighting strategy to be employed in the event of a fire, in accordance with Section 10 of our FPMP guidance.**

Clearly state which resources you have available, and which techniques will be used (and whether they will be employed separately or together) and why.

To decide which of these options, or combinations of options, is appropriate you must consider the following:

- Scale and nature of the environmental hazards, and activities that take place on site
- Risks posed to people, the environment, and property
- Type of materials you store on site, the form you store them in, and the length of time needed to extinguish a fire involving them
- Availability of firewater containment facilities
- Local topography, weather conditions and fire scenarios that could reasonably be expected on site

Finally, the action to be taken if a fire occurs must also be clearly defined.

## **Section 11 – Water supplies**

### **6. ACTION: Confirm that the fire hydrants conform to British Standard 750 or equivalent, and that any hydrant is accessible and suitable for use in an emergency. Provide written confirmation that this has been checked with your local Fire and Rescue Service, in accordance with Section 11 of our FPMP guidance.**

## **Section 12 – Managing fire water run-off**

### **7. ACTION: Update your FPMP to confirm where run off flows to. If the intention is for this to flow to sewer, a written agreement must be in the FPMP from the sewerage undertaker. This consideration is advised by Section 12 of our FPMP guidance.**

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Your FPMP states that a designated sacrificial area may be used for excess firewater runoff. Provide further details of this sacrificial area and the flow of runoff into and out of this area.

### **Section 13 – Quarantine area**

#### **8. ACTION: Update your FPMP to meet the requirements of Section 13 of our FPMP guidance in its entirety.**

Specific actions include, but are not limited to:

- Provide a copy of the Quarantine Procedure and standard response protocol.
- Provide a copy of the Fire Detection Procedure.

### **Section 14 – During an incident**

#### **9. ACTION: Update your FPMP to explain how you will divert incoming wastes to alternative sites during a fire. This is required by Section 14 of our FPMP guidance.**

### **Section 15 – After an incident**

#### **10. ACTION: Update your FPMP to meet the requirements of Section 15 of our FPMP guidance in its entirety.**

Specific actions include, but are not limited to:

- Explain how you will clear and decontaminate the site. After a fire the site is highly likely to be contaminated with the by-products of combustion, residual semi-combusted material, and detritus following the firefighting process. The guidance states that the FPMP must state how this clean-up is to be achieved.
- Describe the steps you will take before the site can become operational again. Consider any potential long-term implications of an incident and the effect it might have if you wish to surrender your permit in the future. You may need to submit a site condition report to demonstrate how the site has been returned to a satisfactory state.

### **Section 16 – Reviewing and monitoring your plan**

#### **11. ACTION: Update your FPMP to meet the requirements of Section 16 of our FPMP guidance in its entirety.**

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Specific actions include, but are not limited to:

- Describe the methods and procedures you will use to maintain compliance, as a separate section within your Fire Prevention and Mitigation Plan. It is essential that your plan is kept up to date to ensure that you maintain compliance. It should be treated as a live working document and be reviewed regularly to reflect any changes to your business. You should ensure that you have regular exercises to test how well your plan works and make sure that staff understand their responsibilities and what actions need to be carried out.
- State the circumstances in which a review of the FPMP would be enacted. You must also outline which areas of the FPMP would need updating due to said circumstances. The scenarios which would require review of the plan, and examples of the areas that could need updating are described in Section 16 of our FPMP guidance.

**End of Schedule.**

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