

Mr Ian Gornall (cc Mr James Killick WSP Limited)
Knauf Insulation Limited
Stafford Road
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Our ref: PAN-033018

Date: 21/08/2026

(e-mailed to
ian.gornall@knaufinsulation.com and
James.Killick1@wsp.com)

Dear Sir

We need more information about your application

Application reference: PAN-033018
Operator: Knauf Insulation Limited
Facility: Knauf Shotton

Thank you for your application received on 2/6/2026, 15/6/2026 and 29/7/2026.

I need to ask you for some more information before we can decide whether it is duly made or not. The information required is summarised below:

1. Noise Impact Assessment

A noise impact assessment (NIA) is required in accordance with Schedule 7 (4) of EPR 2016 and article 12 of the Industrial Emissions Directive (2010/75/EU) (IED). The legislation, nature and scale of the proposed plant, location of the site and proposed development in the area mean an NIA in support of the permit application is required in this instance. Although the proposed operations will take place within buildings, there will be noise emissions associated with access and egress activities, including on-site vehicle movements, loading and unloading operations, and the operation of external plant and equipment within the installation boundary. There is a noise screening tool available on the gov.uk website which might have been used for this application, please note this tool has not been adopted by NRW.

On 29/7/2026 a copy of the NIA prepared for the planning application was provided to NRW. This assessment was prepared for a separate regime with different requirements,

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terminology and references outside of environmental permitting. The conclusions, for example, state that the BS4142 assessment satisfies the agreed planning requirement of Flintshire County Council.

A NIA based on BS4142:2014+A1:2019 and a Noise Management Plan based on the results of the NIA in support of the environmental permit application are therefore missing. The assessment should be undertaken in accordance with BS 4142:2014+A1:2019 'Methods for rating and assessing industrial and commercial sound', have regard to the relevant Methods Implementation Document (MID) [Method implementation document \(MID\) for BS 4142 - GOV.UK](#), and assess all noise sources associated with the proposed operation. The submission must also include all relevant noise modelling files and supporting data used in the assessment [Noise impact assessments involving calculations or modelling - GOV.UK](#) to enable NRW to undertake a technical review of this aspect of the permit application.

OPRA Spreadsheet

In NRW we use an Operational Risk Assessment (OPRA) to calculate the annual subsistence fee for the holder of an environmental permit, please submit a completed copy of the OPRA spreadsheet for the proposed installation. A copy of the spreadsheet can be found on our website but for ease of reference a link to the current version can be found below:

[opra-v26-2026-27.xlsx](#)

Supporting Report Version (2026-05-29 UK0040590)

It is noted that there is information missing from the report and a number of references in the document state: 'Error! Reference source not found within this document' e.g. page 17, 23, 35, 98, 104 and Annex 7 waste acceptance procedure.

- Appendices 9 Air Dispersion Modelling and 10 Habitats Regulations Assessment are missing from the submission however:
- Appendix 9 refers to 'Air dispersion Modelling' and also as 'Air Emissions Risk Assessment' (page 9) (AERA) please can you confirm if they are one of the same. The report entitled AERA submitted on the 29/7/2026 references another report for consideration 'Habitats Risk Assessment' which is missing from the submission (see AERA comments below).
- 'Section 3.1 – Environment Management – details of the current KIMS have been assessed for conformance with the requirements of BAT and are presented below in Section 0.' Is this correct as no section 0 was found?
- Page 22 Proposed arrangements - maximum storage volumes are provided within 'Error! Reference source not found'

Dust Emission Management Plan

- Section 4.2 - starts Error! Reference Source not found.
- DEMP is marked confidential please confirm if this is a public register document or any element forms part of your claim for commercial confidentiality.

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Waste Preparation

The supporting document outlines that a rod mill is proposed for sizing the waste Rock Mineral Wool (RMW) within the waste preparation building (section 4.1 Batch preparation). Section 5.4 of the same document states that no treatment of waste is taking place at the installation. Please can you provide clarification around any proposed treatment of waste taking place on site.

Electric Arc Furnace Slags

One of the raw materials proposed for the Submerged Arc Furnace (SAF) is Electric Arc Furnace (EAF) Slags which you have indicated as a by-product used in the production of RMW. Please can you confirm that this will be from primary steel making only i.e. solely from the arc furnace as EAF slags as a term can contain secondary steelmaking slags e.g. ladle slags, Argon Oxygen Decarbonisation slags (AOD).

Containment

There is no mention of industry guidance CIRIA 736 'Containment Systems for the Prevention of Pollution' regarding any of the proposed containment on site within the application. NRW considers this to be BAT in respect of containment for an installation. Please confirm if the proposed new containment infrastructure on site will be built in line with CIRIA 736.

BAT Assessment

Have you considered any secondary BAT conclusions that may be directly or indirectly applicable regarding this application, for example the mechanical treatment of waste for sizing purposes of the waste RMW.

Air Emissions Risk Assessment

In part the report is caught up with a planning report / application rather than a complete air quality assessment for a new bespoke EPR permit for an installation. For example:

'Section 2.3.7 This report should be read in conjunction with the Habitats Regulation Assessment submitted as part of the permitting application, where a detailed discussion is presented.'

The report it is referring to is missing from the submission. However, a stand-alone 'Habitats Regulation Assessment' is usually written in support of a planning application. Planning guidance has also been referenced and references made to a different report a 'Habitats Risk Assessment' namely Section 6.3.15, 6.3.25, 7.1.7' in the AERA which is also missing.

Is there any narrative and / or discussions missing from the 'Air Emission Risk Assessment' / detailed dispersion modelling, in support of the application for an environmental permit. If there is missing information, please provide a complete assessment report that evaluates air emissions from the proposed installation in respect of human health and sensitive ecosystems for NRW review and technical assessment.

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Although UK regulators may recommend that an environmental permit application is submitted alongside any planning application for a proposed development, the two regimes are distinct. As you are aware NRW is a statutory consultee within the planning process; however, environmental permitting is a separate process with different considerations and requirements. It is therefore important that the information provided with the application is complete and relevant to environmental permitting to prevent any confusion between the different regimes.

Installation boundary

Please confirm that there is no cross over of the installation boundary for TATA Steel UK Limited (EPR/BR7321IK) and the proposed site.

Charge Tool

The charge tool submitted with the application is missing the NIA which NRW requires. Please resubmit the charge tool with the inclusion of an NIA and arrange for the difference to be paid. I can confirm payment has been received by NRW for the permit application of £28,824. With the inclusion of the NIA the corrected fee is £31,397 making difference of £2,573 to pay.

Your application includes a request for commercial confidentiality we will write to you separately regarding this.

If you email or write to us, please quote the application reference PAN-033018 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 contact me using the details in the footer of this letter.

Yours faithfully

Karen Dunn
Lead Specialist Officer

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