



MöllerTech Ltd

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**Natural Resources Wales
Regulated Industry Team Leader
Permitted Service (Floor 4)
Cambria House
29 Newport Road
Cardiff CF24 0TP**

6th July 2016

Dear Sir/Madam

Re: National Resource Wales Permit Number EPR/AB1234CD for Hazrem Environmental Limited

We are writing to object to the issuing of the above permit number.

Our factory is located on the Nine Mile Point Industrial Estate, Cwmfelinfach, next to the site for the proposed recycling facility. We supply plastic moulded components and assemblies to the automotive industry operating 24 hours a day, 5 days per week. We currently employ 380 people and we are the largest employer on the industrial estate.

In October 2015, our representations against the planning application for the recycling plant were submitted by our consultant, Mr G Powys Jones – see copy letter attached. Whilst we acknowledge that the representations we have made regarding access, parking and traffic congestion are outside your organisation's remit, we do not believe that these concerns, and more importantly, the detrimental impact they will have on day-to-day operations for existing companies on the estate, have ever been given proper consideration.

Our objections against the issuing of the permit number are set out below and mainly reflect our concerns regarding the adverse impact that the recycling plant will have on the air quality and the health of the one thousand people currently employed on the industrial estate.

We manufacture and assemble plastic parts for car interiors. These include fabric covered parts such as pillar covers and centre consoles. Some of our parts are made from nominated plastics and fabrics which are designed by our customers to give off a particular odour when fitted in the vehicle – these contribute to the “new car smell” which appeals to consumers. We have concerns that either the parts, or the returnable packaging they are shipped in (which is stored outside of our plant), could become contaminated by odours or dust coming from the proposed recycling plant. This would have serious commercial and operational issues for us as a business and we do not think that this issue of odours and dust either from the plant chimney, or from the storage of waste prior to processing has been addressed in your report.

We understand that the projected levels of Nitrogen dioxide (NO₂) emissions from the recycling plant will be significant. They will be broadly equivalent to the emissions from 9,600 diesel cars in constant use. Furthermore, we believe that the projected NO₂ emissions figure may be under-stated as it makes no allowance for additional NO₂ which could be generated from the heating or drying of organic waste.

Some of our employees are required to work outside of our factory in storage/loading yards which are just metres from the recycling plant. In addition, many of our employees use the external picnic areas around our factory for rest breaks. The potential impact on the air quality for these employees who are regularly outside our factory, in very close proximity to the recycling plant, has not been considered in any of your reports on air pollution.

We do not believe that the NRW has addressed the impact on air pollution that will arise from the significant increase in HGV traffic on the estate. Based on the information provided in the original application, we calculate that, when the recycling plant is opened, the current volume of HGV traffic on the estate will double during the peak hours of 06:00 to 18:00. No provision has been made in your calculations on air pollution to reflect this increase. Nor has any consideration been given to the impact on the air quality on the estate for pedestrians, cyclists and motor cyclists.

We have been advised that recent readings taken by Caerphilly County Borough Council (CCBC) from the NO₂/Particulate Matter (PM) in the Wattsville area show that air pollution is close to the legal annual mean limit of 40 micrograms of NO₂ per cubic metre of air (40 µg/m³). Therefore, we do not understand why a permit should be granted to further pollute the atmosphere in an area which is already at the legal limit. Moreover, both the World Health Organisation and National Health Service have stated that there are no safe levels for NO₂ and particulate matter.

In view of the above, and also because of the unreliability of the "bias adjusted" data provided by CCBC which, in our opinion, erroneously incorporated data from Caerphilly and Blackwood, we believe that accurate independent data should be collected from the areas which are most affected by the recycling plant. Therefore, we request that Air Quality Management Areas should be established for the following locations:

1. Wattsville
2. Cwmfelinfach
3. Nine Mile Point Industrial Estate

We would propose that a minimum of six month's actual data or readings from these locations be collected and assessed. This would then form the basis of an independent professional study on air pollution in the area. Any decision to grant a permit to Hazrem should be placed on hold pending the outcome of an independent study.

In addition to the above, we also have other reservations regarding the accuracy and reliability of the data and methodology used by NRW in evaluating the impact that the recycling plant will have on air pollution within the area. These include the following points:

Absence of local data

Due to lack of available data – NRW have used “similar” data from another area which supposedly replicates the conditions found in the lower Sirhowy Valley. We do not believe that this approach is acceptable as it fails to consider the impact of micro climates on air pollution, and that micro climates are acknowledged to be unique to individual valleys. Therefore, we cannot conceive how using “similar” data will accurately reflect the specific conditions that exist in our location. Furthermore, no consideration appears to have been included in your calculations to assess the impact of pluming and the consequent impact on air pollution for the surrounding resident areas.

Data assumptions

The NRW have used a 1.5 km height resolution in their calculations. The industrial estate is situated in a steep valley with surrounding mountains which are less than 400 metres in height. We do not understand why the calculations are based on a height resolution which is way above the local human habitation levels. We would request that the pollution assessment be calculated using a more appropriate height resolution assumption which reflects the height levels where humans are presently living and working.

Data Modelling Software

We note that the NRW has used KLAM-21 software to calculate the effect of temperature inversion on pollution. However, we also note that NRW have only considered the night time drainage but appear to have ignored the day drainage in their calculations. For anyone working or living in the valley, it is well known that temperature inversion occurs during the day as well. In addition, we understand that the KLAM-21 software is relatively new and un-tested. We have been advised that there are other more reliable and established software packages available which could (and should) have been used instead of KLAM-21.

In conclusion, we request that the decision to grant the permit to Hazrem be postponed until all of the issues and concerns outlined above have been addressed.

We believe that when reaching your decision to grant a permit, the health and safety of all of the people employed on Nine Mile Point Industrial Estate and residing in the neighbouring communities should be paramount.

We would also remind you of your obligations under the Wellbeing of Future Generations (Wales) Act 2015, in which the objectives of the Act are identified as:

“To make public bodies listed in the Act think more about the long-term, work better with people and communicate with each other, look to prevent problems and take a more joined-up approach.”

As one of the public bodies listed in the Act, we feel that given the manner in which NRW have reached the decision to grant this permit without consideration of local opinions and external expertise, it is evident that NRW has failed to meet its obligations under the Act.



We consider that the data models used by the NRW in its decision making process are crude and unreliable. In view of the potential health risks to the local employees and inhabitants, we believe that it would be irresponsible of the NRW to proceed without seeking independent expert opinion on the validity of their assumptions and data models.

Therefore, we would propose that an independent expert be appointed as soon as possible to carry out a comprehensive assessment and report on the environmental impacts of the recycling plant on the estate.

Yours Faithfully,

A handwritten signature in black ink, appearing to read 'CHM'.

Clayton Harding
Managing Director
For and on behalf of Möllertech Limited

A handwritten signature in black ink, appearing to read 'Mark Cerasale'.

Mark Cerasale
Finance & Administration Manager
For and on behalf of Möllertech Limited

Enc

Cc: Rhiannon Passmore, Assembly Member for Islwyn
Chris Evans, Member of Parliament for Islwyn
Lesley Griffiths, Cabinet Secretary for Environment and Rural Affairs