

## Tim Colebrook

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**From:** Ross, Stuart <Stuart.Ross@cyfoethnaturiolcymru.gov.uk>  
**Sent:** 31 August 2021 13:10  
**To:** Tim Colebrook  
**Subject:** RE: Pre Application Advice  
**Attachments:** Risk\_Screening\_Report Water.pdf; Risk\_Screening\_Report Air.pdf

**CAUTION:** This email originated from outside of RPS.

Tim,

Apologies, with attachments this time.

Stuart

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**From:** Ross, Stuart  
**Sent:** 27 August 2021 14:57  
**To:** Tim Colebrook <Tim.Colebrook@rpsgroup.com>  
**Subject:** Pre Application Advice

Hi Tim,

Apologies for delay in getting back to you.

Since we last spoke I have been in touch with our Permitting Service and discussed your request for a pre-application meeting to cover the points raised in your original email below. It is our permitting service who are best placed to address your queries.

As I'm sure you're aware, pre-application advice is a discretionary service and unfortunately due to resourcing issues we are currently unable to meet your request for a meeting. I understand that this may come as a disappointment.

We have been able to address the specific queries raised in your email and I hope this helps with your application. It is currently unlikely that we will provide any further pre application advice (chargeable or otherwise) other than responses to short email queries where possible.

Please find our response to your queries below. .

- *Confirm that there are no specific issues or changes to previously given advice for the permitting of the facility;*

Having reviewed the minutes of the previous meeting we do not believe there are any significant changes to the advice previously provided by NRW.

- *Identification of all designated sites (SAC/SPA/Ramsar/SSSI/Nature Reserves/local wildlife sites) that need to be considered as part of the assessments of emissions to air and water;*

As specific information is unavailable at this pre-application stage on point source emissions to air or water a screening report has been undertaken using a central grid reference for the proposed location. The attached reports give an indication only of the designated sites that need to be considered as part of the assessments in support of a permit application. Dependant on the size of the combustion plant (if >50 MW thermal input) the screening distances for habitats sites may change dependant on fuel type.

Please see the following link to the appropriate guidance [Air emissions risk assessment for your environmental permit - GOV.UK \(www.gov.uk\)](http://www.gov.uk/guidance/air-emissions-risk-assessment-for-your-environmental-permit)

- *Noise / odour assessments – would assessments using other noise/odour impacts/ratings for ICT sites already in operation be acceptable?*

These would need to be undertaken for the proposed installation as there will be site specific information for consideration to the particular location. Some source term data can be used in the noise modelling for like for like technology/equipment. The noise impact assessment will need to be in line with BS4142:2014 'Methods for rating and assessing industrial and commercial sound'.

- *Water Assessment – The current discharge screens out using H1, however, due to the various designations and status of the River Dee, would this be acceptable for the permit application or would further assessments be required even though screens out in H1?*

Any hazardous chemicals and/or elements must be assessed via screening tests, the H1 tool can be used for this in line with this guidance: [Surface water pollution risk assessment for your environmental permit - GOV.UK \(www.gov.uk\)](http://www.gov.uk/guidance/surface-water-pollution-risk-assessment-for-your-environmental-permit). If the hazardous chemicals and/or elements screen out there is no need for modelling.

Sanitary determinands must be assessed via H1 Annex D2, guidance here: [H1 annex D2: assessment of sanitary and other pollutants in surface water discharges - GOV.UK \(www.gov.uk\)](http://www.gov.uk/guidance/h1-annex-d2-assessment-of-sanitary-and-other-pollutants-in-surface-water-discharges). For designated watercourses (Natura2000 and SSSI) there are both the Water Framework Directive targets and JNCC (joint nature conservation committee) targets that need to be considered within the assessment.

- *Confirm whether Cost Benefit Analysis / CHP-Ready Assessment are required for the permit application?*

Cost Benefit analysis (CBA) applies to certain new electricity generating plant / industrial installations with an aggregated thermal input of >20MW. Please refer to the Energy Efficiency Directive for clarification on installations exempt from CBA (Article 14) and those that require it. However, if it is CHP-ready and all the electricity and waste heat is accounted for (i.e. steam generation) then we would not expect an extra assessment.

- *Timescales for determination and assessment of the permit application once submitted. I understand there are delays in duly making applications so an understanding of these timescales would be useful.*

We currently have a queue / backlog of 6-7months before allocation to an officer to commence the duly making checklist. The timeline for duly making before determination is 21 days and NRW may get back to the applicant for further information at this stage. The statutory timeline for the determination of a new bespoke permit application is 4 months however this depends on all the information being in place, if a Schedule 5 notice for further information is required this can pause the process.

- *The previous pre-application reference number was WPCC8848, will this remain the same for this pre-app?*

Yes, please use the same reference number.

I hope this helps to address your queries.

Kind regards,

**Stuart Ross AIEMA**

Swyddog Arbenigol Rheoliad Diwyddiant a Wastraff

Lead Specialist Industry and Waste Regulation

Tîm Rheoliad Diwyddiant Gogledd Ddwyrain / Industry Regulation Team North East

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Hi Stuart,

Thanks for your email. I would like to follow up the discussions we had during our previous meeting to discuss the following points:

- Confirm that there are no specific issues or changes to previously given advice for the permitting of the facility;
- Identification of all designated sites (SAC/SPA/Ramsar/SSSI/Nature Reserves/local wildlife sites) that need to be considered as part of the assessments of emissions to air and water;
- Noise / odour assessments – would assessments using other noise/odour impacts/ratings for ICT sites already in operation be acceptable?
- Water Assessment – The current discharge screens out using H1, however, due to the various designations and status of the River Dee, would this be acceptable for the permit application or would further assessments be required even though screens out in H1?
- Confirm whether Cost Benefit Analysis / CHP-Ready Assessment are required for the permit application?
- Timescales for determination and assessment of the permit application once submitted. I understand there are delays in duly making applications so an understanding of these timescales would be useful.

The previous pre-application reference number was WPCC8848, will this remain the same for this pre-app?

I am happy to propose a MS teams meeting if this is suitable for discussions.

I look forward to hearing from you.

Kind regards,

Tim

**Tim Colebrook**

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**From:** Ross, Stuart <[Stuart.Ross@cyfoethnaturiolcymru.gov.uk](mailto:Stuart.Ross@cyfoethnaturiolcymru.gov.uk)>  
**Sent:** 07 July 2021 12:24  
**To:** Tim Colebrook <[Tim.Colebrook@rpsgroup.com](mailto:Tim.Colebrook@rpsgroup.com)>  
**Subject:** Pre Application Advice

**CAUTION:** This email originated from outside of RPS.

Afternoon Tim,

I am writing to confirm receipt of your permit pre-application advice request for the ICT tissue mill.

As you may be aware, NRW can provide up to two hours of discretionary advice free of charge but this has already been utilised during the previous meeting with the company in September 2019 at the St David's Park Hotel. Therefore any further advice will be chargeable at £150 per hour.

Ahead of any meeting I will need to provide you / your client with a written quotation to agree to the scope of services and associated costs – it would be beneficial if you can give me an indication of what specific services you require (e.g. an agenda of the specific permitting issues you wish to cover) so that I can cost this out accordingly.

I note that you have requested a meeting at our Buckley Office, depending on the date of the meeting this may not be possible due to COVID restrictions but we can keep that under review. Alternatively we can arrange a call via MS Teams.

Kind regards,

**Stuart Ross AIEMA**

[Swyddog Arbenigol Rheoliad Diwyddiant a Wastraff](#)  
Lead Specialist Industry and Waste Regulation  
[Tîm Rheoliad Diwyddiant Gogledd Ddwyrain](#) / Industry Regulation Team North East  
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