

FAO Kevin Hughes

14/08/2019

Dear Kevin,

BWRIAD / PROPOSAL: DEVELOPMENT OF A BUILDING CONTAINING 2 NO. GAS ENGINES EACH WITH A MAXIMUM ELECTRICITY GENERATING CAPACITY OF 9.73 MW, 2 NO. STEAM BOILERS, ROOF MOUNTED COOLERS, WALKWAY BETWEEN AN ADJACENT BUILDING AND THE PROPOSED BUILDING, EXHAUST GAS OFFTAKE PIPES AND STEAM PIPES FROM THE GAS ENGINE BUILDING AND CARBON CATALYST ABATEMENT SYSTEM

LLEOLIAD / LOCATION: Kronospan Ltd, Holyhead Road, Chirk, Wrexham

Thank you for consulting Natural Resources Wales (NRW) about the above, which was received on 15/07/2019.

We have significant concerns with the proposed development as submitted. We recommend that you should only grant planning permission if the scheme can meet the following requirement. We would object if the scheme does not meet this requirement.

Requirement: Updated LVIA to consider potential impact of the development upon the AONB.

Landscape

Requirement: Updated LVIA to consider potential impact of the development upon the AONB.

We require additional information with regard to the scale, nature and visibility of any plumes that could result from the proposed gas engines. If the plumes are likely to be a visible component of the development, the LVIA will need to assess these effects - particularly for viewpoint L (Chirk Castle driveway within the Clwydian Range and Dee Valley AONB). Here the cumulative effect of additional plumes has the potential to extend the visual influence of Kronospan along the valley below Chirk Castle.

The LPA may also wish to consider a similar re-evaluation of viewpoints from within the World Heritage Site e.g. viewpoint M.

Air Quality and Protected Sites

The two additional gas engines are already permitted by NRW's Permitting Team as part of Variation Notice EPR/BW9999IG/V007. The air quality assessment provided at the time was assessed and considered acceptable with regards to impact upon protected sites.

Please do not hesitate to contact us if you require further information or clarification on any of the above.

Our comments above only relate specifically to matters that are listed in our 'Consultation Topics' document (September 2018) which is published on our website: (<https://cdn.naturalresources.wales/media/686847/dpas-consultation-topics-august-2018-eng.pdf?mode=pad&rnd=131819256840000000>). We have not considered potential effects on other matters and do not rule out the potential for the proposed development to affect other interests, including environmental interests of local importance.

Advice to Applicant

Works near Watercourse / Construction or Demolition sites

Due to the proximity of the site to watercourses, all works at the site must be carried out in accordance with GPP5 and PPG6: 'Works in, near or over watercourses' and 'Working at construction and demolition sites' which are available on the following website: <http://www.netregs.org.uk/environmental-topics/pollution-prevention-guidelines-ppgs-and-replacement-series/guidance-for-pollution-prevention-gpps-full-list/>

Waste produced during construction

Waste produced during the construction phase of your development must be dealt with appropriately and be in line with all relevant waste legislation including Duty of Care Regulations and Hazardous Waste Regulations. As part of your waste duty of care you must classify the waste produced:

- before it is collected, disposed of or recovered
- to identify the controls that apply to the movement of the waste
- to complete waste documents and records
- to identify suitably authorised waste management options
- to prevent harm to people and the environment.

Any waste removed from site will be subject to waste management controls. The links below provide information on how to classify waste and register as a waste carrier or hazardous waste producer:

<https://naturalresources.wales/permits-and-permissions/waste/?lang=en>

<https://naturalresources.wales/permits-and-permissions/waste/waste-permits/?lang=en>

Further guidance can be found on the GOV website here:

<https://www.gov.uk/managing-your-waste-an-overview/duty-of-care>

Surface Water Drainage

We refer the developer to the Environment Agency (2017) 'Approach to groundwater protection' position statements which have been adopted by Natural Resources Wales. In particular the developer should be aware of the advice under Position Statements G11 (Discharges from areas subject to contamination) and G13 (sustainable drainage systems) applies to this development.

The applicant should be advised that, in addition to planning permission, it is their responsibility to ensure that they secure all other permits/consents relevant to their development.

Yn gywir / Yours sincerely,

Daniel Davies

Daniel Davies

Cynghorydd, Cynllunio Datblygu / Advisor, Development Planning

Cyfoeth Naturiol Cymru / Natural Resources Wales