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01/02/2022

Annwyl Syr/Madam / Dear Sir/Madam,

BWRIAD / PROPOSAL: Local Energy Centre, comprising Combined Heat and Power and Energy Storage Scheme

LLEOLIAD / LOCATION: Kepak/St Merryn, Pengarnddu Industrial Estate, Dowlais Merthyr Tydfil, CF48 2TA

Thank you for consulting Cyfoeth Naturiol Cymru / Natural Resources Wales about the above, which we received on 13 January 2022.

We have no objection to the proposed development as submitted and provide the following advice for the Applicant with regards to permits, licences and pollution prevention.

The proposed Combined Heat and Power (CHP) system constitutes a Directly Associated Activity of the main Kepak meat processing installation and therefore, a variation application will need to be submitted to NRW to add the CHP activity to the existing environmental permit. In addition, a new environmental permit application for the CHP sub-installation will be required if this is to be operated by a third party. The applicant should be aware that currently environmental permit applications can take up to six months to determine from receipt of application.

Best available technology will apply to energy use and the installation will need to consider what technology or approach is best for reducing energy use and the environment. In preparation for the permit variation application the operator is advised to use an energy audit to assess energy use at the installation and the various technologies that can be used to reduce energy use and harmful emissions to the environment. The CHP will need to be assessed in comparison to ground and air source heat pumps, local wind generation, solar and heat recovery initiatives.

Pollution Prevention

The proposed oil tank must be bunded and follow CIRIA 736. We refer the applicant to the "Containment systems for the prevention of pollution (C736F)" available from the [Ciria website](#). Information on the minimum legal requirements is available in 'Above ground oil storage tanks: GPP 2' <https://www.netregs.org.uk/media/1475/gpp-2-pdf-jan-2018.pdf>.

Appropriate pollution prevention measures must be employed to protect the water environment during construction. Guidance for Pollution Prevention (GPP) documents are available on the NetRegs website: <http://www.netregs.org.uk/environmental-topics/pollution-prevention-guidelines-ppps-and-replacement-series/guidance-for-pollution-prevention-gpps-full-list/>

Other Matters

Our comments above only relate specifically to matters included on our checklist, *Development Planning Advisory Service: Consultation Topics* (September 2018), which is published on our [website](#). We have not considered potential effects on other matters and do not rule out the potential for the proposed development to affect other interests.

We advise the applicant that, in addition to planning permission, it is their responsibility to ensure they secure all other permits/consents/licences relevant to their development. Please refer to our [website](#) for further details.

If you have any queries on the above, please do not hesitate to contact us.

Yn gywir / Yours faithfully

Mrs C McCorkindale

Cynghorydd - Cynllunio Datblygu / Advisor - Development Planning
Cyfoeth Naturiol Cymru / Natural Resources Wales