



KELLOGG COMPANY OF GREAT BRITAIN LIMITED

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Mr. R Smith,
Examining Authority
The Planning Inspectorate
Room 3D
Temple Quay House
2 The Square
Bristol
BS1 6PN

5th October 2016

Dear Rynd Smith,

Re: Application by Wrexham Power Ltd for an Order Granting Development Consent for the Wrexham Energy Centre

Following a review of the Applicant's response to our written representation of 4th August, a number of our initial concerns remain with regards to the construction of the proposed development of the Wrexham Energy Centre and the potential impact on Kellogg operations:

Air Quality

Our main concern continues to be construction dust, and in particular the potential for this dust to contaminate the Kellogg balancing pond, which discharges to the local watercourse.

Whilst we understand the mitigations proposed by the Applicant we remained concerned that there is a real potential for construction dust to cause an exceedance of our discharge authorisation.

The balancing pond, located to the front of the Kellogg's premises less than 20 meters from the Power Station complex site, collects rain water run-off from around the Kellogg site, from where it discharges to the River Dee via a weir overflow. Since the water volume in the pond is dependent on rain fall, during dry periods it can be sometime before the water overflows through the weir to the culvert. So no water replacement rate can be applied to this pond, as suggested by the consultants.

We acknowledge the balancing pond is not classed as a sensitive ecological receptor, as defined in the IAQM guidance, however, for legal compliance reasons, it is extremely important to us that the risk to this pond is still considered. The balancing pond is consented to discharge to the River Dee under our Environmental Permit for Total Suspended Solids, Chemical Oxygen Demand and Bio chemical Oxygen Demand. If the pond was found to be out of compliance of permit limits, a notification would be

required to Natural Resource Wales which ultimately could become a regulatory breach, resulting in significant financial and business reputation implications. Further additional costs may also be incurred for remedial works required to bring the balancing pond back into the required regulatory consent limits.

Traffic Management

We have reviewed the draft Construction Traffic Management Plan (CTMP) as submitted to the Planning Inspectorate. We require confirmation that this CTMP will be updated to address the requirements of all Kellogg employees including those who walk and cycle to work. We acknowledge that the final CTMP will be developed by the appointed contractor and approved by Wrexham County Borough Council (WCBC). However given the close proximity of the Kellogg site entrance to the construction site, and the potential for impact on our business operation, we hereby request to be involved in this process and to have sign off of the plan.

Food Safety

Vermin and Pest Control

It is our understanding that during the construction phase mitigation measures will be put in place to prevent vermin and pest ingress onto the construction site as detailed in the draft CEMP paragraph 5.6. However from a food safety perspective we require reassurance that steps will be put in place to prevent vermin and pests from migrating from the Wrexham Power site on to Kellogg property during construction activities.

Potential Utility Disruption

We have concerns that during the construction of the proposed Power Station there is the potential for utility disruption i.e. electricity, gas, water, trade effluent discharge which will be detrimental to our production process and result in significant costs due to loss of production and potential down time of the plant. We require reassurance that appropriate mitigation measures are implemented to prevent this from occurring.

We require some reassurance from the applicant that if any of the above concerns did occur that costs would be recovered.

I look forward to your response in dealing with this matter.

Yours Sincerely



Plant Director
Karen Thomas