



Proposed DCO Application by SSE Slough Multifuel Ltd for Slough Multifuel Project

Royal Mail Group Limited's response to Deadline 2 of the Examination

Background

Royal Mail has previously submitted representations on this scheme:

- EIA Scoping consultation – December 2021;
- Section 42 consultation – June 2022; and
- Relevant representations – December 2022.

Royal Mail is an Interested Party to the Examination (IP Registration Number: 20033478).

Under section 35 of the Postal Services Act 2011 (the "Act"), Royal Mail has been designated by Ofcom as a provider of the Universal Postal Service. Royal Mail is the only such provider in the United Kingdom. The Act provides that Ofcom's primary regulatory duty is to secure the provision of the Universal Postal Service. Ofcom discharges this duty by imposing regulatory conditions on Royal Mail, requiring it to provide the Universal Postal Service.

Royal Mail is under some of the highest specification performance obligations for quality of service in Europe. Its performance of the Universal Service Provider obligations is in the public interest and this should not be affected detrimentally by any statutorily authorised project.

Royal Mail's postal sorting and delivery operations rely heavily on road communications. Royal Mail's ability to provide efficient mail collection, sorting and delivery to the public is sensitive to changes in the capacity of the highway network.

Royal Mail is a major road user nationally. Disruption to the highway network and traffic delays can have direct consequences on Royal Mail's operations, its ability to meet the Universal Service Obligation and comply with the regulatory regime for postal services thereby presenting a significant risk to Royal Mail's business.

Every day, in exercising its statutory duties Royal Mail vehicles use all of the main roads and adjacent local roads that may potentially be affected by the proposed Slough Multifuel site, e.g. the M4 and A355. Any periods of congestion, road disruption / closure, night or day, on or to the roads immediately connected to Slough Multifuel or the surrounding highway network will have the potential to impact operations and may consequently disrupt Royal Mail's ability to meet its Universal Obligation service delivery targets

Royal Mail has an operational property approximately 2 miles from the proposed SSE Slough Multifuel site (Slough Delivery Office, SL1 1AA) and a further 10 operational properties located within 10 miles:

1. Slough DO, SL1 1AA
2. Slough HUB, SL3 0DG
3. Heathrow WBC HUB/MED, SL3 8AG
4. International Logistics HUB, SL3 8AQ
5. The Queen Elizabeth DO/DMB/RET, SL4 1AA
6. Ascot DO/FPO, SL5 9AA
7. Maidenhead DO, SL6 1AA
8. Maidenhead PAR, SL6 1AY
9. Marlow DO/OFF/RET, SL7 1AA
10. Netdespatch OFF, SL7 1AU
11. Gerrards Cross DO, SL9 8GX



Update on Royal Mail's position as at March 2023

Royal Mail Group Limited (RM) supports this proposed Slough Multifuel Extension Project, but is seeking to secure mitigations to protect its road based operations during the construction phase.

Royal Mail has reviewed SSE Slough Multifuel Limited's response to its Relevant Representation as copied below.

2.2 Applicant's Response

- 2.2.1 The Applicant notes the comments made on behalf of Royal Mail Group (RM) and welcomes RM's support for the Slough Multifuel Extension Project.
- 2.2.2 The Applicant considers that RM's road-based operations will be adequately protected during the construction phase through the measures secured by the Construction Environmental Management Plan (CEMP), which the Proposed Project would be required to comply with pursuant to the draft DCO requirements (Application Document Ref. 2.1), and the Applicant does not consider that any further measures are required.
- 2.2.3 The Slough Multifuel Facility (the 'Consented Development') was originally consented in June 2017 under 'The Town and Country Planning Act 1990' (the 'TCPA') (under Planning Permission Refs. P/00987/051 (being a Section 73 variation of P/00987/024 and P/00987/035) and P/00987/025, P/00987/052 and P/19876/000).
- 2.2.4 The construction of the Consented Development is taking place in accordance with a CEMP, which was approved by Slough Borough Council pursuant to Condition 17 of Planning Permission Ref. P/00987/051 (the 'TCPA Permission') (Application Document Ref. 7.7). The CEMP includes measures for the management of construction traffic and access/haul routes and controlled hours for delivery, and a Construction Traffic Management Plan (CTMP) is appended (Appendix 1 of the CEMP) (Application Document 7.6).
- 2.2.5 Construction of the Consented Development is at an advanced stage and is currently expected to be completed by Quarter 4 2024. The construction traffic associated with the Consented Development has been managed in accordance with the approved CEMP and CTMP and the Applicant is not aware of any adverse impacts being encountered on the highway network as a result of construction traffic, nor is it aware of any issues or concerns being raised by RM in respect of its operations specifically.
- 2.2.6 The Proposed Project is an extension of the Consented Development comprising the carrying out of limited physical works to increase the efficiency and gross installed capacity of the Slough Multifuel Facility from just under 50 MW to circa 60 MW. The Proposed Project will have limited construction effects and the worst case scenario, as identified in Chapter 7 of the Environmental Statement (Application Document Ref. 6.2.7), is 20 additional HGV deliveries over the entire two month construction phase (an average of less than one per day) and an additional 1-2 staff shuttle buses per day (between the off-site staff car park on Whitby Road and the Site). The Proposed Project will not result in any increase in the operational throughput of waste, vehicle movements or operating hours at the Slough Multifuel Facility.
- 2.2.7 Construction of the Proposed Project will be managed in accordance with the existing approved CEMP, which incorporates a CTMP, (including any approved revisions) pursuant to Requirement 3(1)(b) of the draft DCO.



- 2.2.8 Furthermore, although RM's RR relates specifically to construction impacts, in respect of operation of the Proposed Project it is worth noting that Requirement 6(1)(a) of the draft DCO states that the Proposed Project shall not be commissioned unless the requirements of Condition 36 (Highways Scheme) of the TCPA Permission have been satisfied, while Requirement 7(1)(b) requires the Proposed Project to be operated in accordance with the details approved under Condition 36.
- 2.2.9 The Applicant therefore considers that sufficient controls are in place or are proposed through the draft DCO to ensure that the construction and operational traffic associated with the Proposed Project is adequately managed and that no adverse impacts are encountered on the highway network or by other road users.
- 2.2.10 The Applicant is committed to entering into dialogue with RM in order to agree a Statement of Common Ground (SoCG).

Royal Mail Response

Reference paragraph 2.2.2 that *"RM's road-based operations will be adequately protected during the construction phase through the measures secured by the Construction Environmental Management Plan (CEMP), which the Proposed Project would be required to comply with pursuant to the draft DCO requirements (Application Document Ref. 2.1), and the Applicant does not consider that any further measures are required."*

Paragraph 2.2.8 also makes reference to Requirements 6(1)(a) and 7(1)(b) of the draft DCO that was published in November 2022. A copy of these Requirements is provided below.

Commissioning

- 6.—(1) The authorised development shall not be commissioned unless the requirements of:
- (a) conditions 9 (contaminated land mitigation and remediation strategy verification report), 29 (noise monitoring programme), 36 (highways scheme) and 37 (pest scheme) of the TCPA permission; and
 - (b) condition 6 (parking spaces) of the further TCPA permission

have been satisfied.

Operating

- 7.—(1) The authorised development shall be operated in accordance with -
- (a) the requirements of conditions 20 (noise levels), 23 (acceptable fuel type), 28 (dust), 30 (fuel deliveries), 31 (fuel deliveries), 33 (sound systems), 34 (waste hierarchy) and 35 (waste transfer operations) of the TCPA permission;
 - (b) the details approved, including any revisions approved, pursuant to conditions 4 (landscaping and tree planting scheme), 9 (contaminated land mitigation and remediation strategy verification report), 10 (surface water drainage), 13 (odour management plan), 18 (fauna management plan), 29 (noise monitoring programme), 36 (highways scheme) and 37 (pest scheme) of the TCPA permission; and
 - (c) the details approved, including any revisions approved, pursuant to conditions 3 (cycle parking) and 4 (living wall) of the further TCPA permission.

In the CEMP, CTMP, and draft DCO, no specific reference has been made to Royal Mail in terms of receiving prior notification and consultation of any construction work. It therefore does not address any of Royal Mail's three requests (as requested in the June 2022 response) that specific wording is added to secure the following mitigations:



1. the CTMP includes specific requirements that during the construction phase Royal Mail is notified by SSE Slough Multifuel or its contractors at least one month in advance on any proposed road closures / diversions / alternative access arrangements, hours of working,
2. where road closures / diversions are proposed, SSE Slough Multifuel or its contractors liaise with Royal Mail at least one month in advance to identify and make available alternative highway routes for operational use, where possible, and
3. the CTMP includes a mechanism that informs Royal Mail about works affecting the local highways network (with particular regard to Royal Mail's distribution facilities near the DCO application boundary as identified above).

It is also requested Royal Mail be provided with named contacts at Slough Multifuel or its contractor/s for all consultations and notifications during the construction period at least two months before any works commence.

Any queries or information requests arising from this response by Royal Mail should be directed to:

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