

# **SLOUGH MULTIFUEL EXTENSION PROJECT**

Planning Inspectorate Ref: EN010129

## **The Slough Multifuel Extension Order**

**Land at 342 Edinburgh Avenue, Slough Trading Estate, Slough**

**Document Ref: 9.4 Applicant's Comments on Written  
Representations, Responses to ExQ1 & Local Impact Report**

The Planning Act 2008



**Applicant: SSE Slough Multifuel Limited**

April 2023 – Deadline 3

## DOCUMENT HISTORY

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## GLOSSARY

<b>Abbreviation</b>	<b>Description</b>
BAT	Best Available Techniques
BEIS	Department for Business, Energy and Industrial Strategy
CEMP	Construction Environmental Management Plan
CIP	Copenhagen Infrastructure Partners
CTMP	Construction Traffic Management Plan
DCO	Development Consent Order
DESNZ	Department for Energy Security and Net Zero
EA	Environment Agency
EIA	Environmental Impact Assessment
EP	Environmental Permit
ES	Environmental Statement
ExQ1	Examining Authority's First Written Questions
HGV	Heavy Goods Vehicle
ISH	Issue Specific Hearing
LIR	Local Impact Report
MW	Megawatts
NSIP	Nationally Significant Infrastructure Project
PA 2008	The Planning Act 2008
PINS	The Planning Inspectorate
RM	Royal Mail Group Limited
RR	Relevant Representation
SBC	Slough Borough Council
SEGRO STEL	SEGRO (Slough Trading Estate Limited)
SMF	Slough Multifuel Facility
SoCG	Statement of Common Ground
SoS	Secretary of State
TCPA	Town and Country Planning Act 1990
WR	Written Representation

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## 1.0 INTRODUCTION

### 1.1 Overview

- 1.1.1 This document (Document Ref. 9.4) has been prepared on behalf of SSE Slough Multifuel Limited (the 'Applicant'). It forms part of the application (the 'Application') for a Development Consent Order (a 'DCO'), that was submitted to the Secretary of State (the 'SoS') for Business, Energy and Industrial Strategy ('BEIS') (now the SoS for the Department of Energy Security and Net Zero 'DESNZ'), under Section 37 of 'The Planning Act 2008' (the 'PA 2008') on 30<sup>th</sup> September 2022. The Application was accepted for Examination by the Planning Inspectorate on 26<sup>th</sup> October 2022.
- 1.1.2 The Applicant is seeking development consent for the extension of the consented Slough Multifuel Facility (the 'Consented Development'), an energy from waste electricity generating station, on land at the Slough Trading Estate, Slough (the 'Site').
- 1.1.3 A DCO is required for the extension (the 'Proposed Project') as it falls within the definitions and thresholds for a 'Nationally Significant Infrastructure Project' (a 'NSIP') under Sections 14(1)(a) and 15 of the PA 2008, being the extension of an onshore electricity generating station in England, which when extended will have a capacity of more than 50 megawatts ('MW').

### 1.2 The Purpose and Structure of this Document

- 1.2.1 The purpose of this document is to set out the Applicant's comments on the following written submissions which were submitted into Examination at Deadline 2:
- Royal Mail Group Limited's Written Representation ('WR') [REP2-018];
  - SEGRO (Slough Trading Estate Limited's) WR [REP2-019];
  - National Highways' written submission [REP2-017];
  - Slough Borough Council's ('SBC's') Response to ExQ1 [REP2-014];
  - The Environment Agency's Response to ExQ1 [REP2-016]; and
  - SBC's Local Impact Report ('LIR') [REP2-015].
- 1.2.2 The document is structured as follows:
- Section 2 contains the Applicant's comments on the WRs and National Highways' written submission.
  - Section 3 contains the Applicant's comments on the responses to ExQ1.
  - Section 4 contains the Applicant's comments on SBC's LIR.

## 2.0 APPLICANT'S COMMENTS ON WRITTEN REPRESENTATIONS

### 2.1 BNP Paribas on behalf of Royal Mail Group Limited

2.1.1 A WR was submitted by BNP Paribas on behalf of Royal Mail Group Limited ('RM') at Deadline 2 ([REP2-018]). The WR states:

*"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.*

*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 ...*

*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."*

## 2.2 Applicant's Comments

2.2.1 The Applicant previously provided a detailed response to RM's Relevant Representation ('RR') [RR-001] at Deadline 1 (Document Ref. 9.1) [REP1-003] and subsequently submitted a draft SoCG (Document Ref. 8.4) to RM for consideration on 20<sup>th</sup> March 2023 ahead of Deadline 2. The Applicant maintains its position (set out in its response to RM's RR (Document Ref. 9.1) [REP1-003]) 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.

2.2.2 A meeting was held with RM on 27<sup>th</sup> March 2023 – following the submission of its WR – to discuss the draft SoCG and its WR [REP2-018] submitted at Deadline 2. It is the Applicant's understanding that, following this meeting, RM's position has moved on significantly from the position set out in its WR. The Parties' position will be confirmed in the SoCG to be submitted to the Examination at Deadline 4.

2.2.3 At the meeting with RM on 27<sup>th</sup> March 2023, the Applicant confirmed the following:

- The DCO seeks to facilitate an increase in the efficiency and gross installed capacity of the already consented Slough Multifuel Facility (the 'Consented Development') from just under 50 megawatts ('MW') to circa 60MW.
- How the increase in efficiency/capacity will be achieved is explained in the Applicant's responses to questions Q1.2.4 and Q1.3.1 (Document Ref. 9.2) [REP2-012] of ExQ1. The Applicant referred RM to the diagrams at Appendix 1 of Document Ref. 9.2, which illustrate how the increase in efficiency/capacity will be achieved.
- The physical works required to facilitate the increase in efficiency/capacity are relatively limited. The works will be predominately located within the boiler house and turbine hall of the Consented Development (which is currently under construction). The only 'external' works will be a new single pipe run between the two buildings. This additional pipe will be 18 metres above ground and have a diameter of 273 millimetres and a length of 20 metres. It will be located alongside other pipes of similar dimensions and on a pipe rack all of which form part of the Consented Development.
- The Proposed Project does not involve any increase in the throughput of waste (fuel), vehicle movements, or operating hours at the Consented Development (over and above what is already consented).
- Construction work on the Consented Development is already well advanced. It was explained to RM during the meeting that construction work is now past its peak and no more road closures are required for either the construction of the Consented Development or the Proposed Project. Furthermore, the construction phase for the Proposed Project is only expected to last for approximately two months, and is expected to be in parallel with the final stages of the construction on the Consented Development, anticipated to occur in Q1 2024.

- Construction of the Consented Development has taken place in accordance with the Construction Environmental Management Plan ('CEMP') (Document Ref. 7.6) [APP-078] approved by SBC. Appendix 1 of the CEMP includes a Construction Traffic Management Plan ('CTMP'). The CTMP covers construction traffic management and Figure 2 of the CTMP shows the delivery routes. The construction of the Proposed Project is also required to be carried out in accordance with the CEMP and CTMP (pursuant to Requirements 3(b) and 4 of the draft DCO (Document Ref. 2.1, Rev. 2.0) [AS-003]). The Applicant is not aware of any issues having been encountered as a result of traffic relating to the construction of the Constructed Development. The Applicant notes that RM has raised no issues with regard to the Consented Development construction works to date.
- Although RM's comments relate to the construction phase, it was also noted that the Consented Development is also subject to a Section 106 agreement (Document Ref. 7.10) [APP-083] that controls operational traffic, including by setting routing for operational traffic and a cap on HGV movements (an average of 126 HGVs to and 126 HGVs from the Site per day), and the Proposed Project will be required to comply with the obligations contained within this agreement pursuant to a supplemental deed to be entered into with Slough Borough Council.

2.2.4 At the end of the meeting RM confirmed that it now had a better understanding of the Proposed Project and indicated that it should be able to provide a response on the draft SoCG ahead of the Issue Specific Hearing ('ISH') on 19<sup>th</sup> April 2023. As the ISH has now been cancelled, the Applicant will continue to engage with RM and submit the SoCG by Deadline 4.

### 2.3 SEGRO (Slough Trading Estate Limited)

2.3.1 The WR [REP2-019] submitted by SEGRO (Slough Trading Estate Limited) ('SEGRO STEL') at Deadline 2 states:

*"As you are aware from our Relevant Representation, Slough Trading Estate Limited (a subsidiary of SEGRO PLC) owns and manages the Slough Trading Estate where the multifuel facility which is the subject of this Application is being constructed.*

*We understand that the Applicant is, today, required to submit a draft Statement of Common Ground ("SoCG") with us, to include amongst other matters the relationship of the Proposed Development with other occupiers of the Slough Trading State. We have received a draft of this SoCG and are seeking advice in respect of it. We aim to positively engage with the Applicant on the draft SOCG and the Application as a whole. However, there are a number of points that require further consideration, and input from both our legal and technical advisers.*

*As a result, although we are content for the Applicant to submit it in the form we have reviewed, we are not in a position to confirm agreement with any points in the draft SoCG at this stage. We will continue to proactively negotiate the wording with the Applicant, and provide a further substantive update to the Examining Authority in due course where required."*

## 2.4 Applicant's Comments

- 2.4.1 As confirmed above, the Applicant submitted a draft SoCG (Document Ref. 8.5) to SEGRO STEL for consideration on 16<sup>th</sup> March 2023 ahead of Deadline 2.
- 2.4.2 SEGRO STEL provided responses on 21<sup>st</sup> and 22<sup>nd</sup> March 2023, stating that it (and its advisors) required further time to consider the draft SoCG. SEGRO STEL provided the Applicant with a copy of its WR on 23<sup>rd</sup> March 2023 (at Deadline 2).
- 2.4.3 As matters stand, the Applicant has not received any further feedback or comments from SEGRO STEL on the draft SoCG. The Applicant looks forward to engaging further with SEGRO STEL on the draft SoCG once SEGRO STEL has provided its comments on the document. A copy of the draft SoCG has been submitted at Deadline 3.
- 2.4.4 The Applicant will provide an update on the position with regard to the SoCG at Deadline 4.

## 2.5 National Highways

- 2.5.1 Although National Highways' Deadline 2 written submission [REP2-017] is referred to as a response to ExQ1 (the submission make reference to questions Q1.7.1, Q1.7.3, Q1.7.4, Q1.7.5, Q1.7.6 and Q1.7.7 of ExQ1), the Applicant notes that none of the questions in ExQ1 were specifically directed at National Highways. The Applicant has therefore addressed National Highways' written submission in this section.
- 2.5.2 National Highways' written submission states:

*"National Highways has been appointed by the Secretary of State for Transport as a strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). The SRN is a critical national asset and as such we work to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.*

*In relation to the Slough Multifuel Extension Project, this relates to the M4 and M25.*

*National Highways look forward to engaging with the applicant to assess the potential impacts from the proposal on the safe and efficient operation of the SRN, particularly during the construction phase."*

## 2.6 Applicant's Comments

- 2.6.1 The Applicant provided responses to questions Q1.7.1, Q1.7.3, Q1.7.4, Q1.7.5, Q1.7.6 and Q1.7.7 of ExQ1 at Deadline 2 [REP2-012].
- 2.6.2 The Applicant would respond as follows to National Highways' written submissions:
- The DCO Application does not seek any increase in the throughput of waste (fuel) and therefore vehicle movements or operating hours at the Consented Development (over and above what is already consented).
  - Construction work on the Consented Development is already well advanced. Construction work is now past its peak and no more road closures are required for construction, either for the Consented Development or the Proposed Project.



Furthermore, the construction phase for the Proposed Project is only expected to last for approximately two months, and is expected to be in parallel with the end of the construction on the Consented Development, anticipated to occur in Q1 2024.

- Construction of the Consented Development is currently being carried out in accordance with the CEMP (Document Ref. 7.6) [APP-078] approved by SBC. Appendix 1 of the CEMP includes a CTMP. The CTMP covers construction traffic management and Figure 2 of the CTMP shows the delivery routes. The Applicant is not aware of any issues caused to the road network, the M4 or the M25 as a result of construction to date.
- Requirements 3(b) and 4 of the draft DCO (Document Ref. 2.1, Rev. 2.0) [AS-003] require the Proposed Project to also be constructed in accordance with the approved CEMP (and CTMP) and any revisions approved under the relevant planning conditions by SBC.
- In terms of ongoing operation, the Consented Development is also subject to a Section 106 agreement (Document Ref. 7.10) [APP-083] that controls operational traffic, including by setting routing for operational traffic and a cap on HGV movements (an average of 126 HGVs to and 126 HGVs from the Site per day) and the Proposed Project will be required to comply with the obligations contained within this agreement pursuant to a supplemental deed to be entered into with SBC.

2.6.3 The Environmental Statement ('ES') (APP-024 to APP-071) concludes that the only mitigation required for the Proposed Project is compliance with the CEMP, which was approved for the purpose of the Consented Development. Please refer to sections 7.7, 7.9, 7.10 of Chapter 7 Transport and Access (Document Ref. 6.2.7) [APP-032] in relation to construction and operational traffic. No other mitigation is required.

2.6.4 The CTMP is part of the CEMP, and forms an appendix to the CEMP, so references to the CEMP in the ES include the CTMP.

2.6.5 It is not necessary to update the CTMP for the purpose of the Proposed Project. The Proposed Project will comply with the approved CTMP for the Consented Development.

### 3.0 APPLICANT'S COMMENTS ON RESPONSES TO EXQ1

Table 3.1: Applicant's Comments on SBC's Responses to ExQ1

Question no.	Question	SBC Response	Applicant's Comments
Q1.2.1	The case of Hillside Parks Ltd v Snowdonia National Park Authority [2022] UKSC 30 deals with the relationship between successive grants of planning permission for development on the same land and the effect of implementing one permission on another relating to the same site. Notwithstanding that judgement concerns planning permissions rather than a DCO, do the principles it establishes have any implications for the current proposal, particularly having regard to the terms of Art 8?	The Council has sight of the Applicant's response to this question, and is in agreement.	The Applicant notes SBC's response to the Applicant's response to this question (Document Ref. 9.2) [REP2-012].
Q1.2.8	Having regard to clauses 9.8 and 9.9 of the S106 Agreement [APP-083], how would the S106 [APP-083 and APP-084] be enforceable against the implementation of the DCO?	The Council has sight of the Applicant's response to this question, and is in agreement.	The Applicant notes SBC's response to the Applicant's response to this question (Document Ref. 9.2) [REP2-012].
Q1.2.9	a) Is the Council satisfied that the Applicant's Planning Conditions Tracker [APP-023] identifies all the relevant conditions from the certified permissions and that they are adequately transposed into the dDCO?	The Council have sight of a revised Planning Conditions Tracker (dated March 2023) prepared by the Applicant; which includes additional reference to Condition 20 (noise levels) of TCPA permission as applicable to construction phase, and the Cooling Tower permission (P/20018/000). The Council are satisfied that the revised conditions tracker identifies all relevant conditions from the certified permission, and they are adequately transposed to the dDCO.	The Applicant has submitted a revised Planning Conditions and DCO Requirements Tracker (Document Ref. 5.7, Rev. 2.0) for Deadline 3.
	b) Does the Council have any comments on the way in which the conditions in the TCPA and further TCPA permissions are transposed into the DCO?	The Council are satisfied that the TCPA conditions are transposed to the DCO.	SBC's response is noted.
Q1.7.1	Clause 9.9 of the S106 Agreement [APP-083] says that it does not prohibit or limit the right to develop the Land in accordance with a planning permission granted after the date of the Agreement. By extension, this would also appear to apply to the Deed of Variation [APP-084]. a) Given that the transport assessment relies on the S106 as varied to cap the number of HGV movements [ES paragraph 7.8.5, APP-032]), what reliance can be placed on the S106 to bind the Proposed Development to that cap?	The Council has sight of the Applicant's response to this question, and is in agreement.	The Applicant notes SBC's response to the Applicant's response to this question (Document Ref. 9.2) [REP2-012].

	b) ES paragraph 7.7.3 [APP-032] states that the s106 requirements for an operational Travel Plan for the consented development would apply equally to the Proposed Project. Please explain how this would work in the light of the comment above regarding the reliance that can be placed in the S106 to bind the Proposed Development.	The Council has sight of the Applicant's response to this question, and is in agreement.	The Applicant notes SBC's response to the Applicant's response to this question (Document Ref. 9.2) [REP2-012].
Q1.7.2	ES paragraphs 7.2.11 to 7.2.13 [APP-032] identify development plan documents, but do not identify any relevant policies within those documents. Please comment on whether there are any development plan policies relevant to the transport topic area.	The Council has sight of the Applicant's response to this question, and is in agreement.	The Applicant notes SBC's response to the Applicant's response to this question (Document Ref. 9.2) [REP2-012].

**Table 3.2: Applicant's Comments on the Environment Agency's ('EA's') Responses to ExQ1**

Question no.	Question	EA Response	Applicant's Comments
Q1.1.1	Please provide information on any instances of non-compliance and/or difficulties with compliance with the existing Environmental Permit (EP).	We have not recorded any non-compliances with the conditions in the existing Environmental Permit (EPR/KP3702MY). As the plant is currently in the construction phase, most of the Environmental Permit conditions are not yet applicable. The applicant has made submissions to us for two pre-operational conditions, and these are currently being assessed. We do not anticipate any compliance difficulties with these submissions.	The Applicant notes the EA's response.
Q1.1.2	The Applicant's 'Other Consents' document [APP-020] states that there is no need to vary the existing EP for the facility as a result of the Proposed Development. Does the EA have any comments on this matter?	From the information supplied by the applicant, we agree that the Proposed Development does not require a variation to the existing Environmental Permit. As the Proposed Development is not changing the waste throughput or calorific value of the waste (not any of the emission parameters) that were used during the modelling for the current Environmental Permit, the original impact assessment remains valid as there will be no changes to the maximum impact from emissions to air from the Proposed Development. Amending entries for the maximum electrical output of the steam turbine generator (from 50 MW electrical to circa 60 MW electrical) are purely administrative and do not require a permit variation.	The Applicant notes the EA's response.
Q1.3.2	The ES advises that the emission limit values in EPs for waste incineration are expected to be revised nationally in late 2022/early 2023 [APP-033, paragraphs 8.1.4 ad 8.3.3]. a) Has this occurred yet? If not, please advise on when it is likely to happen.	1.3.2 a) - The Environmental Permit for the Slough multi-fuel facility is currently part of the Environment Agency's statutory review of permits in the industry sector for incineration. Through this review the emission limit values included in the latest Best Available Techniques (BAT) Conclusions for Waste Incineration (published in December 2019) will be incorporated into the permit. It is currently estimated that we will issue the varied Environmental Permit (including the revised emission limit values) for the Slough multi-fuel facility in the next 3-4 months. The table below sets out the main reductions in emission limit values that are likely to be included in the revised Environmental Permit:	The Applicant notes the EA's response.  As confirmed in the Applicant's response to Q1.3.2 (Document Ref. 9.2) [REP2-012] the assessment scenarios at Chapter 8 Air Quality of the ES have already taken into account the more stringent limit values, which reflects the worst-case scenario (Document Ref. 6.2.8) [APP-033, paragraph 8.3.3]. This aligns with EN-3 (noting that there is no paragraph number 5.2.7 in EN-3).

		<table border="1"> <thead> <tr> <th>Parameter</th> <th>Current Emission Limit Value</th> <th>Revised Emission Limit Value</th> </tr> </thead> <tbody> <tr> <td>Particulate matter</td> <td>10 mg/m<sup>3</sup> (daily average)</td> <td>5 mg/m<sup>3</sup> (daily average)</td> </tr> <tr> <td>Hydrogen chloride</td> <td>10 mg/m<sup>3</sup> (daily average)</td> <td>8 mg/m<sup>3</sup> (daily average)</td> </tr> <tr> <td>Hydrogen fluoride</td> <td>2 mg/m<sup>3</sup> (periodic)</td> <td>1 mg/m<sup>3</sup> (periodic)</td> </tr> <tr> <td>Sulphur dioxide</td> <td>50 mg/m<sup>3</sup> (daily average)</td> <td>40 mg/m<sup>3</sup> (daily average)</td> </tr> <tr> <td>Oxides of nitrogen (NO and NO<sub>2</sub> expressed as NO<sub>2</sub>)</td> <td>200 mg/m<sup>3</sup> (daily average)</td> <td>180 mg/m<sup>3</sup> (daily average)*</td> </tr> <tr> <td>Cadmium &amp; thallium and their compounds (total)</td> <td>0.05 mg/m<sup>3</sup> (periodic)</td> <td>0.02 mg/m<sup>3</sup> (periodic)</td> </tr> <tr> <td>Mercury and its compounds</td> <td>0.05 mg/m<sup>3</sup> (periodic)</td> <td>0.02 / 0.01 mg/m<sup>3</sup> (periodic) [depending on type of sampling]</td> </tr> <tr> <td>Antimony, Arsenic, Lead, Chromium, Cobalt, Copper, Manganese, Nickel and Vanadium and their compounds (total)</td> <td>0.5 mg/m<sup>3</sup> (periodic)</td> <td>0.3 mg/m<sup>3</sup> (periodic)</td> </tr> <tr> <td>Dioxins/furans (I-TEQ)</td> <td>0.1 ng/m<sup>3</sup> (periodic)</td> <td>0.06 / 0.08 ng/m<sup>3</sup> (periodic) [depending on type of sampling]</td> </tr> </tbody> </table> <p>*see related comments in our answer to question b) below.</p>	Parameter	Current Emission Limit Value	Revised Emission Limit Value	Particulate matter	10 mg/m <sup>3</sup> (daily average)	5 mg/m <sup>3</sup> (daily average)	Hydrogen chloride	10 mg/m <sup>3</sup> (daily average)	8 mg/m <sup>3</sup> (daily average)	Hydrogen fluoride	2 mg/m <sup>3</sup> (periodic)	1 mg/m <sup>3</sup> (periodic)	Sulphur dioxide	50 mg/m <sup>3</sup> (daily average)	40 mg/m <sup>3</sup> (daily average)	Oxides of nitrogen (NO and NO <sub>2</sub> expressed as NO <sub>2</sub> )	200 mg/m <sup>3</sup> (daily average)	180 mg/m <sup>3</sup> (daily average)*	Cadmium & thallium and their compounds (total)	0.05 mg/m <sup>3</sup> (periodic)	0.02 mg/m <sup>3</sup> (periodic)	Mercury and its compounds	0.05 mg/m <sup>3</sup> (periodic)	0.02 / 0.01 mg/m <sup>3</sup> (periodic) [depending on type of sampling]	Antimony, Arsenic, Lead, Chromium, Cobalt, Copper, Manganese, Nickel and Vanadium and their compounds (total)	0.5 mg/m <sup>3</sup> (periodic)	0.3 mg/m <sup>3</sup> (periodic)	Dioxins/furans (I-TEQ)	0.1 ng/m <sup>3</sup> (periodic)	0.06 / 0.08 ng/m <sup>3</sup> (periodic) [depending on type of sampling]	
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Antimony, Arsenic, Lead, Chromium, Cobalt, Copper, Manganese, Nickel and Vanadium and their compounds (total)	0.5 mg/m <sup>3</sup> (periodic)	0.3 mg/m <sup>3</sup> (periodic)																															
Dioxins/furans (I-TEQ)	0.1 ng/m <sup>3</sup> (periodic)	0.06 / 0.08 ng/m <sup>3</sup> (periodic) [depending on type of sampling]																															
	<p>b) Please comment on the capacity of the consented scheme and the Proposed Development to comply with the reduced limit values.</p>	<p>We are not aware of any reason why the consented scheme and Proposed Development would not be able to comply with the revised emission limit values. From the information supplied by the applicant, we understand that the Proposed Development involves no change to the throughput or calorific value of the waste used during the modelling and assessment of potential environmental impacts of the plant's emissions as part of the Environmental Permit application. The applicant has not raised any concerns with us about being unable to comply with the revised limits. The permit requires the plant to use Best Available Techniques. Once constructed, the operator must commission the plant in line with a commissioning plan which they will need to agree with us, and then complete a number of improvement conditions which include reporting to us on how the operational plant is performing against the modelling and assumptions submitted with the Environmental Permit application. Our statutory review of the Permit will also add further improvement conditions which will require the Operator to:</p> <ul style="list-style-type: none"> <li>investigate whether the plant can further reduce NOx emissions below the revised emission limit value without significantly increasing emissions of other pollutants or having a significant negative effect on plant operation, reliability, or bottom ash quality.</li> <li>submit a report on whether waste feed to the plant can be proven to have a low and stable mercury</li> </ul>	<p>The Applicant notes the EA's response.</p>																														

		<p>content (and therefore not require continuous mercury monitoring to be installed).</p> <ul style="list-style-type: none"> <li>submit a report on whether dioxins emissions to air are stable (and therefore not require continuous dioxin sampling to be installed).</li> </ul>	
	<p>c) If the limit values are reduced, what effect would this have on the absolute emission levels of the Proposed Development (with reference to EN-3, paragraph 5.2.7)?</p>	<p>We have unfortunately been unable to locate the document reference EN-3 (paragraph 5.2.7) that is referred to in this question. The lowering of some daily average emission limit values will have the effect of reducing the concentrations and therefore total amount of these pollutants emitted every year. However, for some pollutants such as total particulate matter, it is likely that the plant would have already been capable of operating significantly below the current emission limit values, and therefore the change will have no immediate impact on the total emissions of that pollutant.</p>	<p>The Applicant notes the EA's response.</p>

## 4.0 APPLICANT'S COMMENTS ON SLOUGH BOROUGH COUNCIL'S LOCAL IMPACT REPORT

4.1.1 The Applicant welcomes the submission of SBC's LIR [REP2-015] and notes that the Council does not raise any objections to the Proposed Project on planning policy grounds and concludes that:

*"11.4 Overall when considering weighting between the three strands of sustainable development, it is the Council's view that greater weight should be attributed to the social and economic benefits associated with the proposed development in light of the above assessment.*

*11.3 Overall SBC does not raise any objection to the development."*

4.1.2 The Applicant's comments on the LIR are set out below:

- 6.0 Local Transport Issues, paragraph 6.1 – SBC states that it has no objection to the Proposed Project on transport grounds and that the levels of traffic generated can be accommodated on the road network and will be equivalent to the levels considered acceptable during the determination of the Consented Development. The Applicant would seek clarification from the Council that this statement relates to both construction and operational traffic.
- 11.0 The Relative Merits of Social, Economic and Environmental Impacts of the Proposed Slough Multifuel Extension Project, paragraph 11.3 – SBC states that some harm is identified in relation to environmental impacts in relation to the function of **a multifuel energy facility** (emphasis added). The Applicant would seek clarification from the Council that this statement relates to the Consented Development and not the Proposed Project that is the subject of the DCO Application.
- 11.0 The Relative Merits of Social, Economic and Environmental Impacts of the Proposed Slough Multifuel Extension Project, paragraph 11.3 – SBC states that the **energy facility** attracts neutral weight in the context of a planning balancing exercise (emphasis added). Similarly the Applicant would seek clarification from the Council that this statement relates to the Consented Development and not the Proposed Project.

4.1.3 The Applicant has no further comments on the LIR.