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Dear Sir,

The Town and Country Planning (Environmental Impact Assessment) Regulations 2017

Proposal:	Land West Of The Iver South Sludge Dewatering Centre, South Of M4, Slough
Location	Proposed development of a replacement Energy from Waste (EfW) facility including a High Temperature Incinerator (HTI), provision of a new access road and new junction with the A4, visitor centre, car parking, temporary construction compound, associated works, ancillary buildings and structures.

I am writing pursuant to Regulation 25 of The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 ("the EIA Regulations"), to request further information which is required for the local planning authority (or other determining authority) to reach a reasoned conclusion on the likely significant effects of the development proposal.

Following a careful assessment of the Environmental Statement (ES), we have found that the following further information is required:

Chapter 2 – Site description

1. Paragraph 2.16: This paragraph refers to a historic hedgerow; is this in a different location from the hedgerow remnants mentioned in Chapter 8, paragraph 8.47 and 8.54?

Chapter 6 – Air Quality and Appendix D

This Chapter and Appendix contains a number of points that require clarification, as follows:

1. ES 3.8: The ES explains that the 55 m stack height "was determined following consultation with Heathrow Airport Limited, National Air Traffic Services and the Civil Aviation Authority." It is understood that this sets a practical limit on the stack height, but this is not necessarily the optimum height for mitigation of the air quality impacts of the proposed facility. An investigation into the potential benefits of reducing the building height to offset the limitations on the stack height should be undertaken.

2. Paragraphs 5.27 to 5.31: A short list of cumulative projects is provided in Table 5.2. It is not clear how this list was determined. For example, a search of the National Infrastructure Planning website indicates a number of potentially relevant projects which could have cumulative impacts on air quality. These include
- M25 junction 10/A3 Wisley interchange improvement
 - M4 Junctions 3 to 12 Smart Motorway

A number of further projects are listed as being in the pre-application stage. Please clarify how the cumulative projects were identified. A wider range of projects should be considered in relation to air quality impacts, and the study conclusions updated accordingly. If any additional plans or projects with potential for in-combination air quality impacts are identified, potential in-combination impacts on designated sites should also be assessed in accordance with relevant legislation, case law and guidance.

3. Paragraph 6.9: The ES refers to the closest monitoring points to the site, which are continuous analysers at Slough Lakeside 1 and Slough Lakeside 2. These instruments are presumably linked to the operation of the existing facility. These instruments should be relocated to commence monitoring at least one year prior to operation of the facility, in order to establish a baseline, with monitoring at both the two existing locations and the two new locations for a minimum of one year.
4. Table 6.27: Baseline levels of dioxins, furans and dioxin-like PCBs in this table should be expressed in femtograms toxic equivalent (TEQ) per cubic metre.
5. Paragraphs 6.14 and 6.42: The ES states that “*the impact of the existing Lakeside facilities has been subtracted to give the net change in impacts.*” This approach relies on a maximum of two process lines operating at any one time. While I have an understanding of how it is intended to achieve this, the ES should demonstrate a robust mechanism to show how the simultaneous operation of 3 or 4 lines would be avoided at all times during commissioning.
6. Paragraphs 6.65 to 6.69; Appendix D Table 39: The assessment of cadmium is based on emissions being at 35% of the specified limit, as “typical”. No justification is provided that emissions from the proposed facility would be adequately represented by the use of a “typical” figure. This is particularly important, as the facility is proposed to operate to a more demanding emission limit than the majority of existing installations, and further justification is required to demonstrate that the facility could achieve 35% of this more demanding level. Measured levels from a directly comparable facility may be of assistance.
7. Table 6.18; Appendix D Table 56: The concentration values in these tables are shown in units of pg/m^3 , not $\mu\text{g}/\text{m}^3$ as stated. Is this correct, or does it simply require correction ?
8. Table 6.21; Appendix D Table 59: Note 2 is incorrect as regards chromium VI which was assessed based on average not maximum measured concentration; please refer to note for paragraph 6.83, below.
9. Paragraph 6.83: This section explains that the assessment of chromium VI is based on the average, not maximum measured concentrations. This approach is based on Environment Agency guidance, which states that applicants must justify the use of any data lower than the maximum emission concentrations listed in the guidance. No justification is provided. Additionally, this paragraph states that the average measured concentration in emissions is $0.001 \text{ ng}/\text{m}^3$, whereas the EA guidance Table A1 quotes a value of $3.5 \times 10^{-5} \text{ mg}/\text{Nm}^3$, equivalent to $35 \text{ ng}/\text{Nm}^3$. This discrepancy should be clarified, as it seems to under-estimate

the potential impacts due to chromium VI. Please provide justification that the use of the average chromium VI discharge concentration is appropriate, and clarify of the assumed emission concentration in the light of the data provided by the Environment Agency

10. Paragraph 6.89; Appendix C Section 7.2: The Framework Construction Environmental Management Plan Section 7.2 specifies a list of dust mitigation measures in the form of adopting certain best practice construction measures which are specified within the Plan. A commitment should be included that all relevant mitigation measures in the relevant guidance published by the IAQM will implemented, as appropriate for the forecast risk of impacts.
11. Appendix D, Table 39: The air quality assessment relies on the proposed facility achieving demanding NOx emissions limits of 120 mg/Nm³ (HTI) and 100 mg/Nm³ (EfW). Please clarify whether the higher NOx limit for the HTI is correct. While responsibility for enforcing these emission limits will lie with the Environment Agency, in light of the constraint on stack height referred to paragraph 3.8 the selection and use of this site requires these emission limits to be achieved. Further explanation is required as to how the proposed emission limits will be achieved in practice, using measurement data from a comparable reference installation. It needs to be demonstrated that achieving these limits would not compromise achieving other operational limits and standards, in particular the proposed ammonia emission limit of 10 mg/Nm³.
12. Appendix D Section 6.5.3: This section states: “*The building has a variable height of between 16 m and 42m with an aerodynamic shape and it was considered that including the full height of the building would overstate its effect on dispersion. Therefore, a more representative height of 34 m was used.*” It seems likely, that adopting a height of 34 m where the building height would actually go up to 42 m could underestimate the influence of the building on dispersion, in view of the relatively low stack height of 55 m and confirmation of the influence of the building on dispersion shown in section 6.6.2. A sensitivity study would enable this to be understood. An alternative approach would be to develop a further model scenario using a set of buildings to represent the change in height over the building envelope. Please provide an assessment of the actual building envelope on dispersion of emissions from the facility; if this indicates the potential for higher impacts on air quality, the study conclusions and proposed mitigation should also be reviewed.
13. Paragraph 6.44; Appendix D Section 4.1.2, Figure 12: Appendix D Section 4.1.2 notes that “... *the background concentration closer to main roads will be higher and this will be considered for each receptor.*” While this has generally been done, we consider that impacts close to Richings Way/North Park north of the proposed facility may have been under-estimated. Air quality measurements at SB21 on Richings Way/North Park indicate that annual mean baseline levels of nitrogen dioxide are 39 µg/m³, close to the air quality standard of 40 µg/m³. Figure 12 shows that the contribution to NO₂ levels in this area is approximately 1% of the air quality standard. This road lies within the South Bucks District Council AQMA No.2. Consideration of impacts in this area presents a different perspective to that set out in ES paragraph 6.44. Please comment on the significance of this increase in levels of nitrogen dioxide in the South Bucks District Council AQMA No.2, and provide details of whether further mitigation is required.

Chapter 8 – Cultural Heritage

1. Paragraph 8.24: Please clarify the reference to marine resources

Chapter 10 – Visual Assessment and Appendix I

1. Paragraphs 10.4 (Table 10.1), 10.5 and 10.14 - 10.16: Please note that the London Plan is not part of the development plan for Slough.
2. Appendix I: Paragraphs 1.62 – 1.81: As above.

Chapter 11 – Natural Heritage

1. Paragraph 11.58 and Technical Appendix J.15: The otter survey noted in this paragraph and in the Appendix J contents page was not included in the submission, and should be provided. It is noted that a non-breeding otter holt was found along the Colne Brook in close proximity to the eastern boundary of the site, and otters have been recorded in the wider area at Orlitts Lake, Colbrook West Lake and Old Slade Lake which are in the adjacent LWS. While non-breeding holts are below the LWS criteria for Berkshire, and the limited presence of otters are therefore considered to be of local value (low sensitivity), the construction phase, particularly drainage works, will result in an increase in noise and human presence in the local area. This may result in indirect effects on the otters through noise disturbance. Details of how mitigation will be provided are required.
2. Paragraph 11.62 – 11.72: Further details of how construction noise and visual disturbance will be minimised including provision of visual screening and details of different operations (in particular percussive piling works) that may affect the SPA birds within the Old Slade LWS is required to rule out adverse effects on the integrity of the Ramsar/SPA site.
3. Paragraph 11.74: Prior to construction of the proposed development 0.46 ha of the HPI broadleaved woodland would be felled resulting in a net loss of biodiversity and loss of a Habitat of Principal Importance. Mitigation planting for this loss has been proposed but is insufficient. Please confirm how sufficient mitigation proposals will be provided.

Chapter 12: Summary tables:

1. The Summary tables should be updated to reflect changes in Chapters 2-11

Non technical assessment (NTS):

1. The NTS should also be updated, to reflect changes in Chapters 2-12.

We look forward to receiving the above further information in accordance with the above request. The further information provided will then be advertised, published and made available by the Council in accordance with the minimum timeframes set out in the Regulation 25 of The Town and Country Planning (Environmental Impact Assessment) Regulations 2017, before any decision is made.

Yours sincerely

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