



Consultation on amendments to standard rules permits for medium combustion plant and specified generators

September 2025

We are the Environment Agency. We protect and improve the environment.

We help people and wildlife adapt to climate change and reduce its impacts, including flooding, drought, sea level rise and coastal erosion.

We improve the quality of our water, land and air by tackling pollution. We work with businesses to help them comply with environmental regulations. A healthy and diverse environment enhances people's lives and contributes to economic growth.

We can't do this alone. We work as part of the Defra group (Department for Environment, Food & Rural Affairs), with the rest of government, local councils, businesses, civil society groups and local communities to create a better place for people and wildlife.

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Foreword

The purpose of this consultation is to obtain your feedback on a set of proposed changes associated with the implementation of the Medium Combustion Plant Directive (MCPD) EU/2015/2193

The MCPD aims to control and reduce the worst emissions of nitrogen oxide (NO_x), sulphur dioxide (SO₂), and dust emissions across the European Union.

In January 2018 the [Environmental Permitting \(England and Wales\) \(Amendment\) Regulations \(EPR\) \(2018 No110\)](#) were published to bring the requirements of the MCPD into law making the Environment Agency the regulator in England. It also introduced controls for specified generators to further reduce emissions of NO_x.

The EPR allows for us to develop and maintain standard rules permits for medium combustion plant (MCP) and specified generators (SG) covering specific activities. Since 2018 we have consulted and previously published several standard rules permits which cover a range of low-risk activities. We are now reviewing the standard rules permits available and are asking for your feedback on the changes proposed as well as how we can improve the offering in the future.

A separate consultation is planned on changes to MCP & SG Standard rules 2018 No 1 & 4 to implement the requirements of [EPR schedule 25C - decarbonisation readiness](#). The responses to both consultations will be considered together and will inform any published changes to the MCP & SG standard rule sets, associated generic risk assessments and guidance.

What we are consulting on

The [Environmental Permitting \(England and Wales\) Regulations 2016 \(EPR\)](#) allow us to develop standard rules for certain activities where we anticipate demand. We base the rules on our understanding of the risks.

This consultation is about the following:

- corrections to errors in existing standard rule set tables
- removal of specific standard rules sets which are currently underutilised
- addition of gas oil substitutes as a fuel
- addition of hydrogen as a fuel
- removal of restrictions on caps and cowls and horizontal stacks

We are asking for your views on proposed changes to standard rules. We are particularly keen to understand if there could be any unintended consequences for operators.

We also want to know if you think the changes to existing standard rule sets still protect the environment and human health.

These protections must meet the requirements of the MCPD and EPR.

How standard rules permits work

What a standard rules permit is

Standard rules permits contain one condition which refers to a fixed set (or sets) of standard rules that an operator must comply with. The standard rules define the activities that an operator can carry out. They specify necessary restrictions on those activities, such as emission limits or the types of waste or raw materials that can be accepted at the sites. Standard rules are published on [GOV.UK](https://www.gov.uk) following public consultation.

Any operator who wishes to carry out a particular activity at a particular site or sites can look at the standard rules. If they can comply with them, they can decide to apply for standard rules permit.

We can issue the standard rules permit more quickly and cheaply because we have no decisions to make on site-specific permit conditions. An operator who cannot meet the requirements of the standard rules must apply for a bespoke permit and provide us with additional information. It takes us longer to issue a bespoke permit because we must carry out a more detailed assessment of the application. This includes deciding whether to include site-specific conditions and consult in line with our [public participation statement](#).

There is no right of appeal against the rules in standard rules permits because applying for a standard rules permit is voluntary. If an operator wants to change the way their site operates, they must apply to vary the standard rules permit to a bespoke permit when:

- their operation falls outside the scope of the standard rules
- they feel that the standard rules permit no longer works for their particular operation

Operators must apply for a bespoke permit for any regulated activities not covered by standard rules. These activities generally have a higher potential impact on the environment or require more complex controls than operations for which standard rules permit can be used.

Standard rules permits can only be granted where the regulated facilities have one single legal person as the operator. The term 'operator' is defined in [Regulation 7 of the Environmental Permitting Regulations](#) as the person who has control over the operation of a regulated facility. If a regulated facility has not been put into operation, the person who will have control over it when it is in operation is the operator.

The central issue in deciding whether someone is the operator of a regulated facility is whether they can exercise control over its operation. The operator must demonstrate they have the authority and ability to ensure that the environmental permit is complied with.

Proposed revisions to current standard rules permits

Proposed changes to standard rule 2018 No4

- In relation to the following published rule set: [SR2018 No 4: Specified Generator, Tranche B low risk, 0 – 20 MWth of gas or abated diesel engines operated less than 500 hours a year](#)

We propose to amend Table 3.2 to correct an error. The emission limit value (ELV) for Oxides of Nitrogen (NO and NO₂ expresses as NO₂) for gas engines which are new MCP should say 95 mg/Nm₃, this is in line with the requirements of the MCPD.

Proposed changes to standard rule 2018 No2 & 3

We are proposing that due to low uptake the following standard rules permits will no longer be available for new applications from 28 February 2026:

- [SR2018 No 2: Specified Generator, Tranche B low risk, base load operation 0 – 2 MWth with high background NOx](#)
- [SR2018 No 3: Specified Generator, Tranche B low risk, base load operation 0 – 2 MWth in Air Quality Management Areas or high ambient NOx](#)

We are proposing an amendment to SR 2018 No3 Table 2.3.

We plan to remove operating technique (e) from the table.

This technique requires compliance with NOx ELVs within 10 or 20 minutes.

These limits apply to tranche B and tranche A generators in schedule 25B of EPR.

However, the ELV in this rule set is stricter than those in schedule 25B.

Proposed removal standard rules 2018 No5,6,8 & 9

We are proposing that due to low uptake the following standard rules permits will no longer be available to new or existing holders of these permit types from the 28 February 2026:

- [SR2018 No 5: Specified Generator, Tranche B low risk, 0 – 20 MWth of gas or abated diesel engines operated less than 1,500 hours a year](#)
- [SR2018 No 6: Specified Generator, Tranche B low risk, base load operation 0 – 1.3 MWth with high background NOx](#)

- [SR2018 No 9: Specified Generator, Tranche B low risk, base load operation between 0 - 0.9 MWth - GOV.UK](#)
- [SR2018 No 8: mobile plant Specified Generator, Tranche B low risk, base load operation <1 – 2 MWth](#) .

Removing them from use will reduce the burden on the Environment Agency to maintain the rule sets and allow us to focus our regulatory effort on the creation of standard rules and other low risk activities in this sector.

In relation to SR2018 No8 we are planning a separate consultation on our new approach to permitting mobile MCPs which will include a proposed replacement standard rule set.

Our records show that one operator holds an existing permit for SR2018 No5 and two operators hold an existing permit for SR2018 No9. There are no permit holders of the other permit types listed. We would work with the operators of the existing permits affected to vary them to another relevant permit type instead.

Proposed changes to standard rule 2018 No7

- [SR2018 No 7: New, low risk, stationary Medium Combustion Plant 1 < 20MWth \(in operation after 20/12/2018\)](#)

Following a [direction from the secretary of state](#) the Environment Agency is now authorised to set emission limit values for new fuels where there was no provision within the Medium Combustion Plant Directive or Environmental Permitting Regulations.

We are proposing to expand the range of fuels which can be combusted within this rule set to include:

- hydrogen
- gas oil substitutes (for example Hydrotreated Vegetable Oil (HVO))

The emission limit values for the combustion of hydrogen would align with our [guidance for hydrogen ELVs](#). We will also set an appropriate screening distance to habitats for this fuel type. The introduction of hydrogen as a fuel within this rule set will provide a viable route to decarbonisation for this type of plant.

We recognise that there are several alternative liquid fuels which can act as a substitute to gas oil on the market which operators wish to combust in their medium combustion plant. The Environment Agency has recently released a [regulatory position statement 337](#) which sets out the conditions and types of fuel we will allow under the description of 'gas oil substitutes'. Currently, this only includes hydrotreated vegetable oil (HVO) but will remain under review should other fuels be considered. We propose to add 'gas oil substitute' as a fuel type within this rule set with the same emission limit values and distances to habitats as 'gas oil'.

We will also add an interpretation for 'gas oil substitute' setting out that the use of this fuel has been agreed in writing with the Environment Agency and where in the guidance we will maintain a list of fuels which sit within this interpretation.

Finally, we are at looking at the option of removing the restriction on caps and cowls and horizontal stacks on this standard rules permit to potentially increase the number of operations which can apply for this rule set in particular existing backup generators due to be permitted by 2029 under the current requirements of EPR. This may result in us needing to set relevant screening distances to consider the potential impact to air dispersion for this type of stack configuration.

Proposed changes to standard rule 2022 No9

- [SR2022 No 9: new and existing, low risk, stationary medium combustion plant which is a natural gas boiler - GOV.UK](#)

Following a [direction from the secretary of state](#) the Environment Agency is now authorised to set emission limit values for new fuels where there was no provision within the Medium Combustion Plant Directive or Environmental Permitting Regulations.

We are proposing to expand the range of fuels which can be combusted within this rule set to include Hydrogen.

The emission limit values for the combustion of Hydrogen would align with our [guidance for hydrogen ELVs](#). We will also set an appropriate screening distance to habitats for this fuel type. The introduction of hydrogen as a fuel within this rule set will provide a viable route to decarbonisation for this type of plant.

Finally, we are at looking at the option of removing the restriction on caps and cowls and horizontal stacks on this standard rules permit to potentially increase the number of operations which can apply for this rule set in particular existing backup generators due to be permitted by 2029 under the current requirements of EPR. This may result in us needing to set relevant screening distances to consider the potential impact to air dispersion for this type of stack configuration.

Responding to this consultation

Important dates

This consultation will run for a period of 8 weeks from 15 September 2025 and will close at 23:59 hrs on 09 November 2025. We will consider all responses received by this date before finalising our proposals.

How to respond

This consultation will be run on Citizen Space, which is the Environment Agency's consultation website.

You can view the consultation document and questions online on Citizen Space

Respond online

Please submit your response using the Citizen Space consultation website, as this provides an easy and efficient way to respond. It helps us to:

- gather all responses in one place
- summarise responses quickly and accurately
- reduce the costs of the consultations by avoiding unnecessary printing

Respond by email

If you prefer, you can submit your response by email using the response form, which you will find under the “Related” section of the consultation on Citizen Space.

Please email your completed response form to combustion@environment-agency.gov.uk with the subject header of “Consultation response: Amendments to Standard rules for MCP and SG”.

Ask for a printed version

Please contact us if you would like a printed version of the consultation document sent to you.

You can do this by contacting:

National Customer Contact Centre

Telephone: 03708 506 506

Minicom for the hard of hearing: 03702 422 549

Monday to Friday, 8am to 6pm

Scope of comments

We will consider comments that are related to the changes to the specific standard rule sets in this consultation, and related issues as outlined in the questions. For other concerns outside of this, please email the National Customer Contact Centre at enquiries@environment-agency.gov.uk and they will forward these to the appropriate team.

Privacy notice

The Environment Agency would like to keep you informed about the outcomes of the consultation. If you would like to receive an email acknowledging your response and telling you when we have published the consultation response document, please provide your email address with your response.

By giving us your email address, you consent for us to email you about the consultation. We will keep your details until we have notified you of the response document publication.

We will not share your details with any other third party without your clear and full consent, unless required to do so by law.

You can withdraw your consent to receive these emails at any time by contacting us at combustion@environment-agency.gov.uk.

The Environment Agency is the data controller for the personal data you provide. For more information on how we deal with your personal data please see our [personal information charter](#) on GOV.UK.

Please contact the Data Protection team at dataprotection@environment-agency.gov.uk for more information.

Data protection

How we will use your information

We will use your information to help revise the standard rules permits identified in this consultation. After the consultation has closed, we will summarise responses in a consultation response document and make this publicly available on GOV.UK. We may include comments or quotes, unless you specifically request that we keep your response confidential.

We will make all responses publicly available after the consultation. This includes comments received online and by email unless you have specifically requested that we keep your response confidential.

We will not publish names of individuals or personal data, but we will publish the name of the organisation for those responses made on behalf of organisations. We will not respond individually to responses. If you have asked to be notified, we will contact you to let you know when the consultation response document is published.

In accordance with the Freedom of Information Act 2000, we may be required to publish your response to this consultation but will not include any personal information. If you have requested your response to be kept confidential, we may still be required to provide a summary of it.

Consultation principles

We are running this consultation in accordance with the guidance set out in the [government's consultation principles](#).

If you believe the consultation has not been run in accordance with the principles, please email consultation.enquiries@environment-agency.gov.uk.

Otherwise, for all other queries relating to this consultation, please email combustion@environment-agency.gov.uk

What happens next

Once the consultation closes, we will publish a consultation response document on GOV.UK within 12 weeks of the consultation closing date.

We will use the responses to help refine the standard rules permits. We aim to have our revised standard rules published on GOV.UK and viewable by 12 January 2026.

Would you like to find out more about us or your environment?

Then call us on

03708 506 506 (Monday to Friday, 8am to 6pm)

Email: enquiries@environment-agency.gov.uk

Or visit our website

www.gov.uk/environment-agency

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