

SLOUGH MULTIFUEL EXTENSION PROJECT

Planning Inspectorate Ref: EN010129

The Slough Multifuel Extension Order

Land at 342 Edinburgh Avenue, Slough Trading Estate, Slough

Document Ref: 5.2 – Planning Statement

The Planning Act 2008

The Infrastructure Planning (Applications: Prescribed Forms and Procedure)

Regulations 2009 – Regulation 5(2)(q)



Applicant: SSE Slough Multifuel Limited

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GLOSSARY

Abbreviation	Description
APFP Regulations	The Applications: Prescribed Forms and Procedure Regulations 2009
BEIS	Department for Business, Energy and Industrial Strategy
BNG	Biodiversity Net Gain
CCC	Climate Change Committee
CCR	Carbon Capture Readiness
CCS	Carbon Capture Storage
CEMP	Construction Environment Management Plan
CHP	Combined Heat and Power
CIP	Copenhagen Infrastructure Partners
CO2	Carbon Dioxide
DAS	Design and Access Statement
DEFRA	Department for Environment Food & Rural Affairs
DPD	Development Plan Documents
DCO	Development Consent Order
EA	Environment Agency
EfW	Energy from Waste
EIA	Environmental Impact Assessment
EIA Regulations	The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017
ES	Environmental Statement
EWP	The Energy White Paper
ExA	Examining Authority
FRA	Flood Risk Assessment
GHG	Greenhouse Gas
ha	Hectares
HRA	Habitats Regulations Assessment
HSE	Health and Safety Executive
ICCI	In-combination Climate Change Impacts – the in-combination effects of a changing climate
Km	Kilometre

kV	Kilovolts
LCPD	Large Combustion Plant Directive
LPA	Local Planning Authority
MW	Megawatts
NIP	National Infrastructure Plan
NMA	Non Material Amendment
NPPF	National Planning Policy Framework
NPPG	National Planning Policy Guidance
NPS	National Policy Statement
NPSE	Noise Policy Statement for England
NSIP	Nationally Significant Infrastructure Project
NTS	National Transmission System for gas
PA 2008	The Planning Act 2008
PINS	The Planning Inspectorate
PPG	Planning Practice Guidance
SBC	Slough Borough Council
SMF	SSE Slough Multifuel Limited
SoS	Secretary of State
SPZ	Simplified Planning Zone
TCPA	Town and Country Planning Act 1990
WID	Waste Incineration Directive

CONTENTS

1.0 INTRODUCTION	1
1.1 Overview	1
1.2 The Applicant.....	1
1.3 The Proposed Project Site	1
1.4 The Proposed Project	2
1.5 The Purpose and Structure of this Document	3
2.0 PLANNING HISTORY AND LOCAL PLANNING DESIGNATIONS	4
2.1 Introduction	4
2.2 Historic Site Planning Permissions	4
2.3 Consented Development Planning Permissions	4
2.4 Local Planning Designations.....	7
3.0 THE PLANNING ACT 2008 AND NATIONAL POLICY STATEMENTS	9
3.1 Introduction	9
3.2 Legislative and Decision-Making Framework.....	9
3.3 National Policy Statements for Energy Infrastructure.....	10
3.4 Revised Draft National Policy Statements	14
3.5 Other matters that are important and relevant	15
4.0 ASSESSMENT OF THE PROPOSED PROJECT AGAINST POLICY.....	17
4.1 Introduction	17
4.2 Conformity with the National Policy Statements: 'Assessment Principles'	17
4.3 Generic impacts	23
4.4 Technology specific considerations	43
4.5 The National Planning Policy Framework (Ministry of Housing, Communities & Local Government, July 2021).....	45
4.6 Statutory Development Plan Policy.....	49
4.7 Summary	61
5.0 ASSESSMENT OF THE BENEFITS AND EFFECTS/IMPACTS OF THE PROPOSED PROJECT.....	62
5.1 Introduction	62
5.2 Benefits of the Proposed Project.....	62
5.3 Likely Effects/Impacts of the Proposed Project.....	62
5.4 Summary	62
6.0 CONCLUSIONS	64

TABLES

TABLE 4.1 – GENERIC IMPACTS.....	24
TABLE 4.2 – TECHNOLOGY SPECIFIC CONSIDERATIONS	44
TABLE 4.3 – NPPF POLICIES	46
TABLE 4.4 – STATUTORY DEVELOPMENT PLAN POLICIES	50

APPENDICES

APPENDIX 1: SITE AND CONSENTED DEVELOPMENT PLANNING PERMISSIONS

APPENDIX 2: OFFSITE PLANNING PERMISSIONS

APPENDIX 3: DRAFT NPS ASSESSMENT

1.0 INTRODUCTION

1.1 Overview

- 1.1.1 This Planning Statement (Document Ref. 5.2) 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 has been submitted to the Secretary of State (the 'SoS') for Business, Energy and Industrial Strategy ('BEIS'), under Section 37 of 'The Planning Act 2008' (the 'PA 2008').
- 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(1)(2)(a) and (c) 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 Applicant

- 1.2.1 The Applicant, SSE Slough Multifuel Limited ('SMF') is a 50:50 joint venture between SSE Thermal and Copenhagen Infrastructure Partners ('CIP').
- 1.2.2 SSE Thermal, part of the FTSE-listed SSE plc, is a leading developer, owner and operator of flexible generation, energy-from-waste, and energy storage assets, with over 600 direct employees across the UK and Ireland. SSE Thermal's vision is to become the leading provider of flexible thermal energy in a net-zero world. SSE Generation Limited was granted planning permission in June 2017 to construct the Consented Development at the Site. SSE currently operates the existing Slough Heat and Power Plant at the Slough Trading Estate through a company called Slough Heat and Power Limited.
- 1.2.3 CIP was founded in 2012 and is a fund management company specialising in offering tailor made investment in energy infrastructure assets globally, in particular within the renewable energy sector. CIP is a renewable market pioneer with involvement in some of the World's largest offshore wind projects and other major energy infrastructure projects in North-Western Europe, North America, and Asia Pacific. CIP has extensive biomass and energy from waste experience in the UK.

1.3 The Proposed Project Site

- 1.3.1 The Proposed Project Site (the 'Site') lies entirely within the administrative boundary of Slough Borough Council, a unitary authority, and is located either side of Edinburgh Avenue within the Slough Trading Estate (National Grid Reference SU 953 814) approximately 2.5 kilometres north west of Slough Town Centre.
- 1.3.2 The Site extends to approximately 2.8 hectares in area and was acquired by SSE in 2008. It forms part of the original Slough Heat and Power Plant site.
- 1.3.3 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). Construction of the Consented Development at the Site is well advanced and is currently expected to be completed by Quarter 4 2024.
- 1.3.4 A more detailed description of the Site and its surroundings is provided at Chapter 4 'Existing Site Conditions' of the Environmental Statement ('ES') Volume I (Document Ref. 6.2).

1.4 The Proposed Project

- 1.4.1 The Proposed Project is an extension of the Consented Development comprising the carrying out of the following physical works (Work No. 1 at Schedule 1 'Authorised Development' of the draft DCO, Document Ref. 2.1) to increase the efficiency and gross installed capacity of the generating station from just under 50MW to circa 60MW:
- a boiler primary air preheating system comprising heat exchanger bundles, pipework, valves, pipe supports, thermal insulation, instrumentation, cabling and containment;
 - a boiler secondary air preheating system comprising heat exchanger bundles, pipework, valves, pipe supports, thermal insulation, instrumentation, cabling and containment; and
 - mechanical modifications to the actuated stream turbine inlet control valve to allow steam capacity to be increased.
- 1.4.2 The physical works comprised in the extension are 'engineering operations' and therefore 'development' for the purposes of Section 31 of the PA 2008.
- 1.4.3 As is set out more fully in the Explanatory Memorandum (Document Ref. 2.2), it is only the extension which is the NSIP pursuant to Sections 14(1)(a) and 15(1) of the PA 2008, and the development forming part of the extension (being the Authorised Development) which requires development consent pursuant to Section 31 of the PA 2008. The Consented Development is consented and being constructed pursuant to the TCPA. It is not an NSIP, nor does it form part of one.
- 1.4.4 Separately, the extended generating station requires an ancillary authorisation to 'operate' at over 50MW pursuant to Section 36 of 'The Electricity Act 1989', and this is included within the DCO. This is further explained within the Explanatory Memorandum.
- 1.4.5 The Proposed Project also includes associated development within the meaning of Section 115(2) of the PA 2008, including temporary construction laydown areas, contractor facilities, vehicle parking and cycle storage facilities.
- 1.4.6 The Proposed Project will not increase the throughput of waste, vehicle movements, emissions or operating hours at the Slough Multifuel Facility, and will not alter the scale or external appearance of the consented buildings and structures.
- 1.4.7 The works associated with the Proposed Project will be located predominately within the boiler house and turbine hall of the Multifuel Facility. The only 'external' works will be a single pipe run between these two buildings.
- 1.4.8 The additional pipe will be 18 metres ('m') above ground and have a diameter of 273 millimetres ('mm') and a length of 20m. It will be located alongside other pipes of similar dimensions and on a pipe rack all of which form part of the Consented Development. There will only be limited visibility of the additional pipe from outside the Site.
- 1.4.9 The design and appearance of the proposed material for the additional pipe has been driven by engineering requirements and the Consented Development building design (in order to blend in with that design). The pipe will therefore be constructed of metal and have an Aluzinc/aluminium finish with external grey thermal insulation. The insulation will be 50mm thick increasing the overall diameter of the pipe to 373mm.
- 1.4.10 The design details for the physical works are shown on the Multifuel Facility Plans (Document Ref. 4.4).
- 1.4.11 A Design and Access Statement has not therefore been submitted as part of the Application on the basis that the Proposed Project is solely for engineering works that will not alter the external appearance of the Consented Development.

- 1.4.12 A more detailed description of the Proposed Project is provided at Schedule 1 'Authorised Development' of the draft DCO and Chapter 2 'Proposed Project' of ES Volume I (Document Ref. 6.2) and the area within which the physical works are to occur is denoted by the hatched area on the Works Plan (Document Ref. 4.3).
- 1.4.13 The Explanatory Memorandum and the 'Planning Conditions and DCO Requirements Tracker' (Document Ref. 5.7) confirms where the planning conditions attached to the Existing Permissions should be included as a requirement at Schedule 2 of the draft DCO.
- 1.4.14 It should be noted that the Applicant intends to enter into a further Section 106 Deed of Variation to ensure that the Section 106 obligations within the Deed of Variation dated 17 November 2020 for the Consented Development also apply to the Proposed Project.

1.5 The Purpose and Structure of this Document

- 1.5.1 The primary purpose of this Planning Statement is to assist the Examining Authority ('ExA') and the SoS in their assessment of the Proposed Project by demonstrating how the Applicant has taken account of relevant planning policy, notably the National Policy Statements ('NPSs') for energy infrastructure, which confirm the need for new electricity generating capacity, and the extent to which the Proposed Project complies with the relevant policies of those NPSs, as well as any other matters that are "*important and relevant*" to the SoS's determination of the Application. Such matters include the National Planning Policy Framework ('NPPF') and the statutory development plan.
- 1.5.2 The Planning Statement also considers the benefits of the Proposed Project, the 'need' for the Proposed Project in terms of providing increased low carbon electricity generating capacity, and the environmental effects/impacts of the Proposed Project. Where relevant, the Planning Statement cross references or 'signposts' the relevant Application documents that provide more detail on these matters.
- 1.5.3 The Planning Statement is structured as follows:
- **Section 2: Planning History and Local Planning Designations** – provides an overview of the planning history of relevance to the Proposed Project and the local planning designations that apply to the Site.
 - **Section 3: The Planning Act 2008 and National Policy Statements** – sets out the legislative and policy framework for the consideration of and determination of DCO applications, notably the current NPSs for energy infrastructure and the other matters that may be "*important and relevant*" to the SoS's decision-making, such as the NPPF and the statutory development plan policy. This section also considers the draft revised NPSs for energy.
 - **Section 4: The Assessment of the Proposed Project Against Policy** – provides an assessment of the Proposed Project against relevant policy, notably the current NPSs for energy infrastructure, the NPPF and the statutory development plan. An assessment of the Proposed Project against Draft NPS EN-1 and Draft EN-3 is also provided.
 - **Section 5: The Benefits and Impacts of the Proposed Project** – identifies the benefits of the Proposed Project as well as any environmental effects/impacts and weighs these against each other. It should, however, be noted that the Proposed Project – which is an extension to the Consented Development, involving limited physical works that will not alter the scale or appearance of the consented buildings/structures and not increase the throughput of waste, vehicle movements, emissions or operating hours at the Consented Development – is not anticipated to result in any significant environmental effects/impacts.
 - **Section 6: Conclusions** – sets out the conclusions of the Planning Statement in terms of the overall acceptability of the Proposed Project.

2.0 PLANNING HISTORY AND LOCAL PLANNING DESIGNATIONS

2.1 Introduction

- 2.1.1 This section provides an overview of the planning history and the planning designations (and related policies) that are of relevance to the Site.

2.2 Historic Site Planning Permissions

- 2.2.1 Energy generation at the Site dates back to the 1920s. Listed below are the relevant key planning applications and permissions from the last 50 years. The list does not include applications for the discharge of details (planning conditions).

Planning Permission Ref. P/00987/013

- 2.2.2 Planning permission was granted on 10 January 1989 by Slough Borough Council for the redevelopment of part of the Slough Heat and Power ('SHP') site including the demolition of two cooling towers and a 76m chimney stack, the erection of two coal/oil/gas fired boilers, one 30MW steam turbo generator, ancillary plant, enclosed coal store and 104m chimney stack.

- 2.2.3 The development involved the installation of new coal handling equipment, limestone handling equipment, heavy fuel oil pumping and heating plant, a new gas terminal point, ash and dust handling plant, turbo-generator and feed plant, boiler feed pumps, water treatment plant, cooling system, chlorination plant, a new turbine house, boiler house, a coal store and new concrete chimney to replace the then existing north brick chimney.

- 2.2.4 This plant has now been demolished to make way for the Consented Development.

Planning Permission Ref. 517871

- 2.2.5 Planning permission was granted by Berkshire County Council on 9 December 1997 for the construction of a fibre fuel plant, ancillary offices, storage and service facilities on the site of Buildings 6 and 24 Fairlie Road (on the western boundary of the Site).

Planning Permission Ref. P/00987/019

- 2.2.6 Consent was granted under Section 36 of the Electricity Act 1989 and deemed planning permission by the SoS for Trade and Industry on 29 March 1999 for the installation of an 11MW Combined Heat and Power ('CHP') energy recovery generating plant. This is located in the north-west part of the SHP site and remains in service.

Planning Permission Ref. P/00987/023

- 2.2.7 Planning permission was granted on 14 December 2010 for a gas fired package boiler and the construction of a single storey detached boiler house and associated 36 m high flue subject to conditions. This is located in the south-east corner of the SHP site and remains in service.

2.3 Consented Development Planning Permissions

- 2.3.1 The following planning permissions and approvals comprise the "Existing Permissions" for the Consented Development:

- Section 73 permission P/00987/51 dated 1 February 2022 (being a Section 73 variation of permission P/00987/035 dated 3 March 2020, which was itself a Section 73 variation of the original permission P/00987/024 dated 2 June 2017);
- P/00987/025 dated 2 June (minor works including a services building, water treatment plant and car park) as varied by non-material amendment permission P/00987/053 dated 22 June 2022;

- P/00987/052 dated 4 May 2022 (construction of a weighbridge gatehouse, silo enclosure and external staircase); and
 - P/19876/000 dated 5 August 2022 (erection of a new boundary fence at land off Greenock Road).
- 2.3.2 The Existing Permissions above do not include non-material amendments to superseded planning permissions or temporary planning permissions which relate to the Consented Development, but these are described below.
- 2.3.3 The Existing Permissions are described in more detail below.

Slough Multifuel Facility Planning Permission Ref. P/00987/024

- 2.3.4 Planning permission was granted on 2 June 2017 for the Slough Multifuel Facility (the 'Consented Development'), comprising the demolition of redundant plant and buildings and development of a multifuel CHP electricity generating station of up to 50MW, including an enclosed tipping hall; fuel storage bunker and blending facility; boiler house with combustion grate/s, boiler/s and auxiliary equipment; flue gas treatment (FGT) plant/s; turbine hall with condensing steam turbine; ash and residue handling facilities; erection of a new south chimney stack (up to 90m height) or extension of existing south chimney stack (up to 85m height); plant, associated development and alterations to site access.
- 2.3.5 The planning permission was granted subject to a Section 106 Agreement dated 4 May 2017 (the 'Section 106 Agreement') made between (1) Slough Borough Council (2) Slough Trading Estate Limited (3) Fibre Power (Slough) Limited, Slough Utility Services Limited, Intertrust Corporate Trustee (Jersey) Limited and Intertrust Trustee (Jersey) Limited (the 'Section 106 Agreement Parties'). All of the pre-commencement planning conditions and Section 106 obligations associated with the planning permission were discharged during 2019 and 2020. A copy of the planning permission is provided as Document Ref. 7.1 and a copy of the Section 106 Agreement is provided as Document Ref. 7.11.
- 2.3.6 A Deed of Variation was granted to the Section 106 Agreement (dated 17 November 2020) by the Section 106 Parties. The Deed of Variation made a correction to the clause regarding the definition of 'land' and corrections to erroneous figures regarding annual HGV movements which were identified in the original Section 106 Agreement. A copy of the Section 106 Deed of Variation is provided as Document Ref. 7.12.
- 2.3.7 This planning permission has now been superseded by subsequent variation permissions (see below).

Further Development Planning Permission Ref. P/00987/025

- 2.3.8 A separate permission was also granted on 2 June 2017 for the demolition of an existing fuel store and construction of a central site services building (containing staff facilities, stores/workshops and plant), installation of water treatment plant, provision of replacement car parking, and associated works along the eastern boundary of the Site. Permission Ref. P/00987/025 is known as the 'Further Development Planning Permission'.
- 2.3.9 The Further Development Planning Permission includes the various ancillary staff facilities and parking required to support the Slough Multifuel Facility and was progressed alongside Planning Permission Ref. P/00987/024 and covered a smaller area of the Site. The pre-commencement planning conditions for the Further Development Planning Permission were discharged during 2020. A copy is provided as Document Ref. 7.2.

Non-Material Amendment Ref. P/00987/042 (Parameter Plans)

- 2.3.10 In March 2020 a non-material amendment ('NMA') was granted to amend Condition 1 (Approved Drawing) to reflect minor changes to the parameter drawings in respect of the elevational massing of the Consented Development.

Section 73 Permission Ref. P/00987/035 (Section 73 Variation of Permission Ref. P/00987/024)

- 2.3.11 This Section 73 permission was granted on 3 March 2020 for a series of amendments to Conditions 7 (Phase 3 Site Specific Remediation Strategy) and 9 (Controlled Waters Remediation) of Planning Permission Ref. P/00987/035. The amendments to the conditions altered the phasing/delivery of certain information/surveys, so it could be provided to the Local Planning Authority ('LPA') and Environment Agency at the appropriate stage of construction works at the Site. The permission is provided as Document Ref. 7.5. A deed of variation to the Section 106 Agreement was not required in connection with this permission.
- 2.3.12 This permission has now been superseded by subsequent variation permissions (see below).

Non-Material Amendment Ref. P/00987/042 (Amendment to Planning Permission ref. P/00987/035 to refer to drawings approved under P/00987/037)

- 2.3.13 In April 2020 permission was granted for a NMA to P/00987/035 to correct references to drawings within Condition 1 to align with those approved under a previous NMA to P/00987/024.

Temporary Pedestrian Bridge – Planning Permission Ref. P/17998/000

- 2.3.14 Planning permission was granted on 11 May 2020 for a temporary pedestrian bridge over Edinburgh Avenue for the construction phase of the Slough Multifuel Facility. The temporary bridge was designed to be accessed exclusively by construction personnel crossing from staff facilities at 683/5 Stirling Road (north of Edinburgh Avenue) to the Site on the south side of Edinburgh Avenue.
- 2.3.15 This temporary permission is for a period of 42 months and expires in November 2023. It is not included as one of the 'Existing Permissions' for the purpose of this Application and the DCO given its temporary nature.

Non-Material Amendment (Amendment to Planning Permission Ref. P/00987/050)

- 2.3.16 In July 2021 permission was granted by NMA to Condition 17(k) of planning permission P/00987/035 for the temporary relaxation of noisy construction working hour restrictions. The relaxation was effective from 9 August 2021 until 20 September 2021.

Section 73 Planning Permission Ref. P/00987/051 (Section 73 Variation of Permission Ref. P/00987/035)

- 2.3.17 On 1 February 2022, planning permission was granted for a Section 73 material amendment to planning permission Ref. P/00987/035 to allow for changes to the layout and elevation drawings for the Slough Multifuel Facility to show a new bottom ash enclosure, skips and the relocation of two APCR silos within the Site. Amendments were also made to the approved parameter drawings to reflect the minor elevational changes.
- 2.3.18 Planning permission Ref. P/00987/051 is now the operative planning permission for the Consented Development, superseding planning permission Ref. P/00987/035. The permission is provided as Document Ref. 7.7. A deed of variation to the Section 106 Agreement was not required in connection with this permission.

Non-Material Amendment Ref. P/00987/053 (Amendment to Further Development Permission Ref. P/00987/025)

- 2.3.19 On 2 June 2022 a NMA application was approved for a number of changes to the Conditions 2, 3 and 6 of the Further Development Planning Permission. The changes included a minor reduction to parking within the Further Development site area on the

eastern boundary of the Slough Multifuel Facility site. The NMA approval is provided as Document Ref. 7.8.

West Site Infrastructure – Planning Permission Ref. P/00987/052

- 2.3.20 On 4 May 2022 planning permission was granted for a number of elements of site infrastructure, comprising APCr silo emergency access, bottom ash enclosure and weighbridge gatehouse. The planning application included a small extension to the Slough Multifuel Facility site red line area to the west of the site. The planning permission is included as Document Ref. 7.9.

Greenock Road Fence – Planning Permission Ref. P/19676/000

- 2.3.21 On 5 August 2022 planning permission was granted for a new section of boundary fencing with gated emergency access across Greenock Road to the south of the Slough Multifuel Facility site. The permission is included as Document Ref. 7.10.

Cooling Tower 8 Infrastructure – Planning Application Ref. P/00987/054

- 2.3.22 In July 2022, a planning application was submitted to the LPA for the erection of an electrical house, acid tank, access and underground infrastructure associated with Cooling Tower 8. The proposals comprise relatively small but essential elements for the Cooling Tower 8 area, such as ladder and stair accesses to the cooling tower and proposed electrical house. The proposed electrical house will contain the switchgear that provides the power supply to the cooling water pumps and chemical dosing system for the Slough Multifuel Facility. The planning application is currently pending determination by the LPA.
- 2.3.23 A summary of the planning history relating to the Site and the Consented Development is provided at **Appendix 1**.
- 2.3.24 A number of planning permissions have also been granted by the LPA for off-site facilities to enable the construction of the Consented Development. A summary of these is provided at **Appendix 2**.

2.4 Local Planning Designations

- 2.4.1 The Site lies entirely within the administrative boundary of Slough Borough Council ('SBC'). The statutory development plan for SBC comprises the following development plan documents:
- Slough Local Development Framework Core Strategy 2006-26 Development Plan Document (December 2008) – 'Slough Core Strategy 2008'.
 - Slough Local Development Framework Site Allocations Development Plan Document (November 2010) – 'Slough Sites DPD'.
 - Slough Local Plan (March 2004) Saved Policies (September 2007) – 'Waste Local Plan'.
 - Waste Local Plan for Berkshire (December 1998) Saved Policies (September 2007) – 'Saved Waste Local Plan.'
- 2.4.2 The Policies Map of the Slough Local Plan (2004) confirms that the Site is subject to the following planning allocations/designations:
- A Simplified Planning Zone ('SPZ') which covers the majority of the Slough Trading Estate including the Site. The current SPZ (adopted in 2014) helps to facilitate the continued regeneration and development of the Trading Estate through extensive permitted development rights to estate occupiers. The Site falls into the 'Power Station Subzone' within the SPZ, whereby it is recognised for its role as a part of the Trading Estate and use for continued energy generation, but as such does not benefit from

any of the permitted development rights conferred on the areas outside of the subzone.

- Policy EMP7 (Slough Trading Estate) – the saved Local Plan policy promotes business and industrial uses across the entirety of the Trading Estate, subject to stipulations.

2.4.3 The Site is not subject to any other planning allocations/designations.

3.0 THE PLANNING ACT 2008 AND NATIONAL POLICY STATEMENTS

3.1 Introduction

- 3.1.1 This section of the Planning Statement sets out the legislative and policy framework for the consideration of and determination of applications for Nationally Significant Infrastructure Projects ('NSIPs') such as the Proposed Project, notably the National Policy Statements ('NPSs') for energy infrastructure (including the draft revised NPSs), while also identifying the other relevant legislative and policy matters that the Secretary of State ('SoS') may have regard to in determining applications for development consent.

3.2 Legislative and Decision-Making Framework

- 3.2.1 The main legislative and procedural requirements relating to NSIP applications are set out within the following:
- The Planning Act 2008 (the 'PA 2008').
 - The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 (the 'APFP Regulations').
 - The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the 'EIA Regulations').
- 3.2.2 Before an NSIP can proceed, an application for development consent, granted ('made') in the form of a DCO, must be submitted to the relevant SoS pursuant to Section 37 of the PA 2008. The Planning Inspectorate ('PINS') acts on behalf of the relevant SoS – in this case the SoS for Business, Energy and Industrial Strategy ('BEIS'). PINS is responsible for examining the application and making a recommendation to the SoS who then makes the decision as to whether a DCO should be made authorising the development in question.
- 3.2.3 Section 115(1)(b) of PA 2008 also provides that a DCO can include consent for 'associated development', that is, development that is not part of, but is associated with the NSIP. This may be development that supports the NSIP, helps to address the impacts of the NSIP or is of a type of development normally brought forward with the particular type of NSIP.
- 3.2.4 Under the PA 2008 regime, the policy framework for examining and determining applications for development consent is provided by NPSs. Section 5 of the PA 2008 allows the relevant SoS to designate NPSs setting out national policy in relation to the types of NSIPs listed at Section 14 of the PA 2008. The NPSs are the primary policy used by the relevant SoS to examine and determine applications for NSIPs.
- 3.2.5 Section 104 of the PA 2008 provides that where a NPS has effect, the SoS must determine the application in accordance with the relevant NPSs and appropriate marine policy documents (if any) having regard to any local impact report produced by the relevant local planning authority; any matters prescribed in relation to development of the description to which the application relates; and any other matters which the SoS thinks are both "*important and relevant*" to their decision, unless this would:
- lead to the UK being in breach of its international obligations;
 - be in breach of any statutory duty that applies to the SoS;
 - be unlawful;
 - result in the adverse impacts of the development outweighing the benefits; or
 - be contrary to any condition prescribing how decisions regarding an NSIP application are to be taken.

3.3 National Policy Statements for Energy Infrastructure

3.3.1 As confirmed above, a number of NPSs have been designated in relation to energy infrastructure. These were published in July 2011 by the SoS for the Department for Energy and Climate Change (now BEIS). The designated NPSs include an overarching NPS setting out general policies and assessment principles for energy infrastructure and a number of technology specific NPSs. The NPSs considered to be of relevance to the Proposed Project (and which together provide the primary basis for the SoS's decision on the Application) are as follows:

- Overarching NPS for Energy (EN-1); and
- NPS for Renewable Energy Infrastructure (EN-3).

3.3.2 The above energy NPSs are considered later within this section.

3.3.3 On 27 June 2019, following advice from The Climate Change Committee ('CCC'), the UK Government announced a new carbon reduction 'net zero' target for 2050. This was given effect by an amendment to the Climate Change Act 2008 (the target for the net UK carbon emissions for 2050 changed from 80% to 100% below the 1990 baseline).

3.3.4 In response to the net zero target, the Government's Energy White Paper (the 'EWP'), published in December 2020, confirmed that the SoS for BEIS has decided that it is appropriate to review the suite of NPSs for energy infrastructure, to ensure that they reflect the objectives set out in the EWP, and that the Government continues to have a planning policy framework that can deliver the investment required to build the infrastructure needed for the transition to net zero by 2050. Draft revised NPSs for energy infrastructure were published for consultation in September 2021. As yet, no date has been set for the designation of the draft energy NPSs.

3.3.5 While the review of energy NPSs is undertaken, the current suite of NPSs remains relevant Government policy and has effect for the purposes of the PA 2008.¹ They therefore continue to provide a proper basis on which PINS can examine, and the SoS can make decisions on, applications for energy NSIPs. This has been confirmed in recent SoS decisions, notably that for the Thurrock Flexible Generation Plant DCO (dated 16 February 2022), where the SoS stated:

"National Policy Statements EN-1 (the Overarching National Policy Statement for Energy – "NPS EN-1") and EN-2 (the National Policy Statement for Fossil Fuel Electricity Generating Infrastructure – "NPS EN-2") set out a national need for development of new nationally significant electricity generating infrastructure of the type proposed by the Applicant. NPS EN-1 sets out the assessment of development consent applications for electricity generating infrastructure should start with a presumption in favour of granting consent. The ExA noted the strong need case for electricity generating projects that is set out in NPS EN-1 and NPS EN-2. The Energy White Paper, "Powering our Net Zero Future", which was published on 14 December 2020 announced a review of the suite of energy National Policy Statements but confirmed that the current National Policy Statements were not being suspended in the meantime. The relevant energy National Policy Statements, therefore, remain the basis for the Secretary of State's consideration of the Application." (paragraph 4.2 of the SoS's decision letter).

¹ See paragraph 1.6.1 of EN-1; EN-2 and EN-4 and paragraph 1.5.1 of EN-5.

3.3.6 Further to the above, the EWP (page 54) states:

"... the need for the energy infrastructure set out in the energy NPS remains, except in the case of coal-fired generation.... Nothing in this white paper should be construed as setting a limit on the number of development consent orders which may be granted for any type of generating infrastructure set out in the energy NPS".

3.3.7 An overview of the current NPSs of relevance to the Proposed Project is provided below.

Overarching National Policy Statement for Energy (EN-1)

3.3.8 EN-1 sets out national policy for defined types of energy infrastructure, which includes electricity generating stations generating more than 50MW onshore, and has effect, in combination with the relevant technology specific NPS i.e. EN-3, as the primary basis for decisions under the PA 2008 (EN-1, 1.1.1, EN-3, 1.2.1).

3.3.9 Part 2 (Government policy on energy and energy infrastructure development) states that *"energy is vital to economic prosperity and social well-being and so it is important to ensure the UK has secure and affordable energy"* and that producing the requisite energy and getting it to where it is needed "necessitates a significant amount of infrastructure, both large and small scale" (paragraph 2.1.2).

3.3.10 Not all aspects of Government energy and climate change policy will be relevant to decision making, however *"The role of the planning system is to provide a framework which permits the construction of whatever Government – and players in the market responding to rules, incentives or signals from Government – have identified as the types of infrastructure we need in the places where it is acceptable in planning terms"*, while also taking account of the views of affected communities and the principles of sustainable development (paragraph 2.2.4).

3.3.11 Reference is also made to the UK's reliance on fossil fuels, which (notably natural gas) are likely to play a significant role for some time to come, and it is recognised that there is a need to wean the country off such a high carbon energy mix, reduce greenhouse gas emissions and to achieve greater diversification (paragraphs 2.2.5/6). It is further noted that EN-1 sets out how the energy sector can help deliver the Government's climate change objectives with new low carbon energy infrastructure contributing to climate change mitigation (paragraph 2.2.11).

3.3.12 Paragraph 2.2.20 states that it is critical the UK continues to have secure and reliable supplies of electricity in making the transition to a low carbon economy, for which it needs sufficient electricity capacity; reliable supply chains e.g. fuel for power stations; a diverse mix of technologies and fuels (including supply routes of fuels); effective price signals enabling market participants to react in a timely way (paragraph 2.2.20). The intention of the NPSs is to provide a robust planning framework to facilitate private sector investment (paragraph 2.2.26). It is emphasised that the Government's wider objectives include contributing to the achievement of sustainable development and ensuring our energy infrastructure is safe (paragraphs 2.2.27/28).

3.3.13 Part 3 of EN-1 'The need for new nationally significant energy infrastructure projects' defines and sets out the 'need' for nationally significant energy infrastructure. Paragraph 3.1.1 states that the UK needs all types of energy infrastructure covered by the NPS in order to achieve energy security at the same time as dramatically reducing greenhouse gas emissions. Paragraph 3.1.2 goes on to state that it is for industry to propose the type of energy infrastructure and that the Government does not consider it appropriate for planning policy to set targets for or limits on different technologies.

3.3.14 Notably, paragraph 3.1.3 stresses that the SoS should assess applications for development consent for the types of infrastructure covered by the energy NPSs *"...on the basis that the Government has demonstrated that there is a need for those types of infrastructure..."* (with the scale and urgency of that need being described in the relevant

part of EN-1). Paragraph 3.1.4 confirms that the SoS should give substantial weight to the contribution that all projects would make toward satisfying this need when considering applications under the PA 2008. As such, EN-1 is clear that the need that exists for new energy infrastructure is not open to debate or interpretation.

- 3.3.15 In considering the need for new NSIPs, particularly in respect of meeting energy security and carbon reduction objectives, EN-1 recognises that there are benefits in having a diverse mix of power generation, to avoid over dependency on one type or source of fuel or power; additionally, the different types of generation have different characteristics which can complement each other. For example, fossil fuel generation is responsive at short notice to meeting varying levels of energy demand, however, until such time as this can operate with carbon capture and storage, such power stations will not be low carbon, and whereas renewables offer a low carbon and proven fuel source, technologies such as wind result in intermittent generation (paragraph 3.3.4).
- 3.3.16 EN-1 specifically recognises the need to replace closing electricity generation and consequently that with a combination of tightening environmental regulations and ageing power stations, there is a need for more electricity capacity to support increased energy supplies from renewables (which increasingly may include plant powered by the combustion of biomass and waste) (paragraphs 3.3.7 to 3.3.10).
- 3.3.17 Paragraph 3.3.15 of EN-1 stresses that in order to secure energy supplies that enable the UK to meet its climate change obligations to 2050, there is an urgent need for new – and particularly low carbon – energy infrastructure to be brought forward as soon as possible.
- 3.3.18 Section 3.4 of Part 3 ‘The role of renewable electricity generation’ confirms (paragraph 3.4.1) that the UK is committed to sourcing 15% of its total energy (across the sectors of transport, electricity and heat) from renewable sources by 2020 and that projects need to come forward urgently to ensure the UK meets this target. Paragraph 3.4.3 identifies the technologies from which it is considered that future large scale renewable energy generation is likely to come. This includes:
- “Energy from Waste (EfW) - the principal purpose of the combustion of waste, or similar processes (for example pyrolysis or gasification) is to reduce the amount of waste going to landfill in accordance with the waste hierarchy and to recover energy from that waste as electricity or heat...;”*
- 3.3.19 EN-1 therefore confirms that EfW represents low carbon, renewable electricity generation. Furthermore, paragraph 3.4.4 states that EfW can be used to provide peak and base load electricity on demand. As more intermittent electricity comes on to the UK grid (e.g. wind and solar), the ability of EfW to deliver predictable, controllable electricity is increasingly important in ensuring the security of the UK’s supplies.
- 3.3.20 Paragraph 3.4.5 stresses the urgent of need for new renewable electricity generation and that such projects, including EfW, should be brought forward as soon as possible.
- 3.3.21 Part 4 of EN-1 sets out a number of ‘assessment principles’ that should be applied to the assessment of energy NSIPs applications. General points include (paragraph 4.1.2) the requirement for the SoS, given the level and urgency of need for the infrastructure covered by the energy NPSs, to start with a presumption in favour of granting consent for applications for energy NSIPs. This presumption applies unless any more specific and relevant policies set out in the relevant NPS clearly indicate that consent should be refused or any of the considerations referred to in Section 104 of the PA 2008 (noted above at paragraph 3.2.5) apply.
- 3.3.22 Section 4 of this Planning Statement demonstrates that there is no conflict between the Proposed Project and relevant policies in EN-1 and EN-3 and that none of the considerations set out in Section 104 of the PA 2008 apply.

- 3.3.23 Paragraph 4.1.3 states that in considering any application for development consent, and in particular, when weighing its adverse impacts against its benefits, the SoS should take into account:
- its potential benefits, including its contribution to meeting the need for energy infrastructure, job creation and any long-term or wider benefits; and
 - its potential adverse impacts, including any long-term and cumulative adverse impacts, as well as any measures to avoid, reduce or compensate for any adverse impacts.
- 3.3.24 Paragraph 4.1.4 of EN-1 continues by stating that within this context the SoS should take into account environmental, social and economic benefits and adverse impacts, at national, regional and local levels.
- 3.3.25 Other assessment principles include the matters to be covered within any Environmental Statement ('ES'); the Habitats and Species Regulations; the consideration of alternatives; criteria for 'good design'; grid connection; consideration of Combined Heat and Power ('CHP'); consideration of Carbon Capture and Storage ('CCS' and Carbon Capture Readiness ('CCR'); climate change adaptation; pollution control and environmental regulatory regimes; safety; hazardous substances; health; common law and statutory nuisance and security, amongst others.
- 3.3.26 Part 5 of EN-1 'Generic Impacts' sets out policy on the assessment of impacts which are common across a range of energy infrastructure technologies. Paragraph 5.1.2 stresses that the list of impacts is not exhaustive and that applicants should identify the impacts of their projects in the ES in terms of both those covered by the NPSs and others that may be relevant.
- 3.3.27 Generic impacts include land use; socio-economics; air quality and emissions; noise and vibration; dust, odour, artificial light, steam and smoke; traffic and transport; civil and military aviation; biodiversity and geological conservation; historic environment; landscape and visual; water quality and resources; flood risk and waste, amongst others. In relation to each of the generic impacts listed within Part 5, guidance is provided on how the applicant should assess these within their application and also the considerations that the SoS should take into account in decision-making.
- 3.3.28 In addition to the assessment principles and generic impacts covered by EN-1, NPS EN-3 sets out the factors and 'assessment and technology specific' considerations to be taken into account in the preparation and assessment of applications for renewable energy infrastructure, including relevant environmental matters.
- 3.3.29 The Proposed Project's compliance with the assessment principles and generic and technology specific impacts of the relevant NPSs is considered in Section 4 of this Planning Statement.

National Policy Statement for Renewable Energy Infrastructure (EN-3)

- 3.3.30 EN-3 is one of the suite of technology specific NPSs that sit under EN-1. It deals specifically with renewable energy electricity generating infrastructure, including EfW generating stations (paragraph 1.8.1).
- 3.3.31 EN-3 is concerned with the impacts and other matters which are specific to renewable energy electricity generating infrastructure and the policies set out within it are additional to the assessment principles and generic impacts set out in the EN-1 and do not replace them.
- 3.3.32 Section 2.5 of Part 2 of EN-3 deals specifically with biomass and waste combustion. Paragraph 2.5.3 states:

“The recovery of energy from the combustion of waste, where in accordance with the waste hierarchy, will play an increasingly important role in meeting the UK’s energy needs. Where the waste burned is deemed renewable, this can also contribute to meeting the UK’s renewable energy targets. Further, the recovery of energy from the combustion of waste forms an important element of waste management strategies in both England and Wales.”

- 3.3.33 Section 2.5 identifies the factors influencing the site selection for EfW plants as including grid connection, transport infrastructure and opportunities for CHP. Technology specific considerations include air quality and emissions; landscape and visual; noise and vibration; odour, insect and vermin infestation; waste management; residue management; and water quality and resources.

3.4 Revised Draft National Policy Statements

- 3.4.1 As part of the Government’s review of the suite of energy NPSs, BEIS published draft NPSs, including draft revised versions of EN-1 and EN-3, for public consultation between September and November 2021.

- 3.4.2 The current suite of energy NPSs described above remain relevant Government policy during this review and continue to have effect for the purposes of the PA 2008. Draft NPS EN-1 sets out the transitional arrangements at paragraph 1.6.2, confirming that for any application accepted for examination before the designation of the draft NPSs, the 2011 suite of NPSs should have effect in accordance with the terms of those NPSs. The draft NPSs will therefore have effect only in relation to those applications for development consent accepted for examination after their designation.

- 3.4.3 Draft NPS EN-1 goes onto state at paragraph that:

“...any emerging draft NPSs (or those designated but not having effect) are potentially capable of being important and relevant considerations in the decision-making process. The extent to which they are relevant is a matter for the relevant Secretary of State to consider within the framework of the Planning Act and with regard to the specific circumstances of each development consent order application”.

- 3.4.4 Draft NPS EN-1 and Draft NPS EN-3 may therefore be considered relevant to the determination of the Application by the SoS.

Draft Overarching National Policy Statement for Energy (EN-1)

- 3.4.5 The existing NPS EN-1, published in 2011, notes that *“some climate change is inevitable”* and that the use of unabated gas and crude oil fuels will still be needed – even beyond 2050. The Draft NPS EN-1 reflects the significant policy change which has occurred since then – the UK Government’s commitment to reduce the use of fossil fuels in order to reach its net zero target.

- 3.4.6 Importantly, Section 3.3 of draft NPS EN-1 confirms that combustion power stations, including EfW facilities are *“...urgently needed to meet the Government’s energy objectives”* (paragraph 3.3.43). Paragraph 3.3.33 acknowledges the specific role of EfW in also reducing the amount of waste going to landfill in accordance with the Waste Hierarchy.

- 3.4.7 Draft NPS EN-1 includes changes to the ‘assessment principles’ in terms of:

- Health, (paragraph 4.3.5);
- Environmental and Biodiversity Net Gain (paragraphs 4.5.1 to 4.5.4); and
- Climate Change adaptation (paragraph 4.9.5).

- 3.4.8 Changes to ‘generic impacts’ are also contained within the Draft NPS EN-1, relating to:

- Greenhouse gas emissions (paragraphs 5.3.1 to 5.3.10);
- Biodiversity and geological conservation (paragraphs 5.4.4 to 5.4.5, 5.4.14, 5.4.16, 5.4.19, 5.4.21 to 5.4.22);
- Historic environment (paragraphs 5.9.10, 5.9.15 to 5.9.16, 5.9.21, 5.9.26);
- Landscape and visual (paragraph 5.10.10);
- Land use, including open space, Green Infrastructure, and Green Belt (paragraph 5.11.8);
- Noise (paragraph 5.12.9);
- Socio-economic impacts (paragraph 5.13.9);
- Traffic and transport (paragraph 5.4.18);
- Resource and waste management (paragraphs 5.15.7 to 5.15.8); and
- Water quality and resources (paragraphs 5.16.3 to 5.16.4).

3.4.9 An assessment of the Proposed Project against these revised 'assessment principles' and 'generic impacts', where relevant, is provided at **Appendix 3** of this Planning Statement.

Draft National Policy Statement for Renewable Energy Infrastructure (EN-3)

3.4.10 The principal change contained within Draft NPS EN-3, in so far as it relates to the Proposed Project, concerns the 'waste treatment capacity' technical specification considerations (paragraphs 2.10.4/5). This requires applicants to demonstrate that proposed EfW plants are in line with the Department for Environment, Food & Rural Affairs' (Defra) policy position on the role of EfW in treating municipal waste. In addition, the Draft NPS EN-3 requires that EfW plants must not result in over-capacity of EfW treatment at a national or local level.

3.4.11 With regard to the above, it is important to note that the Proposed Project will facilitate an increase in the efficiency and gross installed capacity of the Consented Development (which is currently under construction) from just under 50MW to circa 60MW. It will not involve any increase in waste throughput, vehicle movements or operating hours. As such the Proposed Project will not have any implications for EfW treatment capacity at national or local level. It is therefore considered to fully accord with the objectives of Draft NPS EN-3 in this regard.

3.4.12 There is a further notable change to the relevant technical specification considerations, with the inclusion of a requirement regarding infrastructure within national designations (paragraphs 2.5.33 to 2.5.34). However, the Proposed Project is not located within any of the national designations specified in this part of Draft EN-3.

3.4.13 An assessment of the Proposed Project against the revised technical specification considerations in Draft EN-3 is also provided at **Appendix 3**.

3.5 Other matters that are important and relevant

3.5.1 As noted above, Sections 104 of the PA 2008 set out the matters that the SoS must have regard to in determining applications for development consent, which can include any other matters which the SoS thinks are "important and relevant" to their decision.

3.5.2 In addition to the draft revised energy NPPs, the other matters that the SoS may consider important and relevant include the policies contained within the NPPF and the statutory development plan. The Proposed Project's compliance with relevant NPPF and development plan policy is considered at Section 4.

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- 3.5.3 The Applicant considers that other matters that are important and relevant to the SoS's decision include recent UK Government energy and climate change policy, notably the Ten Point Plan; the Energy White Paper and the Net Zero Strategy. These documents set out important Government objectives for decarbonising the UK economy, including the power sector, in order to achieve net zero greenhouse gas emissions by 2050.
- 3.5.4 The Waste Regulations 2011 and national waste management and planning policy may also be relevant, although it is important to note that the Proposed Project will not increase the amount of waste treated by the Slough Multifuel Facility.

4.0 ASSESSMENT OF THE PROPOSED PROJECT AGAINST POLICY

4.1 Introduction

- 4.1.1 This section provides an assessment of the Proposed Project against policy, notably the relevant NPSs, given that Section 104 of the PA 2008 requires the SoS to determine applications for NSIPs in accordance with the relevant NPSs.
- 4.1.2 The assessment of the Proposed Project against the NPSs has been structured so as to follow the relevant 'assessment principle' and 'generic impact' headings set out in EN-1 and also to take account of the 'assessment and technology specific considerations' contained within EN-3 in relation to EfW generating stations, where these are not covered by the assessment principles and generic impacts of EN-1. Each heading references the relevant part or section of the NPSs.
- 4.1.3 Although the focus of this section is principally upon conformity with the NPSs – as these are the primary basis for decisions on NSIPs by the SoS – the Applicant has also had regard to the compliance of the Proposed Project with relevant policies contained within the NPPF and the statutory development plan.
- 4.1.4 An assessment of the Proposed Project against the notable revised policies within Draft NPS EN-1 and Draft NPS EN-3 is provided at **Appendix 3**.

4.2 Conformity with the National Policy Statements: 'Assessment Principles'

- 4.2.1 Part 4 of EN-1 provides the 'General points' that the SoS should take into account in decision-making on NSIPs, in addition to a number of key assessment principles that both applicants and the SoS should have regard to in preparing and determining applications for development consent.
- 4.2.2 The majority of the assessment principles in EN-1 are of relevance to most types of nationally significant energy infrastructure. A number of these are also referred to within EN-3 in relation to the types of technology that are covered by them in 'assessment and technology-specific information' and are therefore also dealt with below and the relevant part of the NPS is referenced.

General Points (EN-1, 4.1)

- 4.2.3 EN-1 'General points' (paragraph 4.1.2) reiterates the urgency of the 'need' for the types of infrastructure covered by the energy NPSs and again confirms that the SoS should start with a presumption in favour granting development consent for energy NSIPs.
- 4.2.4 Paragraph 4.1.3 asserts that when considering applications for energy NSIPs, and in particular, when weighing their adverse impacts against their benefits, the SoS should consider:
- the potential benefits including the contribution to meeting the need for energy infrastructure, job creation and any long-term or wider benefits; and
 - the potential adverse impacts, including any long-term and cumulative adverse impacts, as well as any measures to avoid, reduce or compensate for any adverse impacts.
- 4.2.5 Paragraph 4.1.4 goes on to state that in this context, the SoS should take into account environmental, social and economic benefits and adverse impacts, at national, regional and local levels.
- 4.2.6 There is a clear need for the Proposed Project – established by EN-1 – which recognises the need for more renewable and low carbon electricity generating capacity, including from the combustion of waste (EN-1 paragraphs 3.3.7 to 3.3.10). The Proposed Project will enable the Slough Multifuel Facility to generate additional low carbon electricity without

increasing the throughput of waste, vehicle movements, emissions or operating hours, or altering the scale or external appearance of the consented buildings and structures. This will contribute toward the security of UK electricity supplies and the objectives of UK energy and climate change policy, making a positive contribution toward the Government's net zero by 2050 target.

- 4.2.7 Section 104 of the PA 2008 provides that where a NPS has effect, the SoS must determine the application in accordance with the relevant NPSs and appropriate marine policy documents (if any) having regard to any local impact report produced by the relevant local planning authority; any matters prescribed in relation to development of the description to which the application relates; and any other matters which the SoS thinks are both "important and relevant" to their decision.
- 4.2.8 It is considered that NPSs EN-1 and EN-3 have effect in the case of the Proposed Project, as it represents an NSIP for the purposes of Sections 14(1)(a) and 15(1)(2)(a) and (c) 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 50MW. Section 104 therefore applies to the Proposed Project and the SoS must determine the Application in accordance with EN-1 and EN-3, having regard to any local impact report prepared by the local planning authority and any other matters that the SoS thinks are important and relevant.
- 4.2.9 Paragraph 4.1.5 confirms that matters that the SoS may consider both important and relevant to decision making on energy NSIPs. In the event, however, of a conflict between such matters (e.g. local development plan policies) and a NPS, it clarifies that the NPS prevails.
- 4.2.10 Section 5 of the Planning Statement provides an assessment of the benefits and environmental effects/impacts of the Proposed Project.

Environmental Statement (EN-1, 4.2, EN-3, 2.6)

- 4.2.11 The Proposed Project represents an Environmental Impact Assessment ('EIA') development and the Application therefore includes an Environmental Statement ('ES') that reports the findings of the EIA undertaken, in accordance with Section 4.2 in EN-1, and paragraph 2.6.5 in EN-3. The EIA has been carried out, and the ES prepared, in accordance with 'The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017'.
- 4.2.12 The ES comprises the following documents, which form part of the Application submitted to the SoS:
- ES Non-Technical Summary – Document Ref. 6.1.
 - ES Volume I (Main Report) – Document Ref. 6.2.
 - ES Volume II (Figures) – Document Ref. 6.3.
 - ES Volume III (Appendices) – Document Ref. 6.4.

Alternatives (NPS EN-1, 4.4)

- 4.2.13 Paragraph 4.4.1 confirms that as in any planning case, the relevance or otherwise to the decision-making process of the existence (or alleged existence) of alternatives to a proposed development is in the first instance a matter of law, which falls outside the scope of the NPS. It goes on, however, to state that from a policy perspective there is no general requirement to consider alternatives or to establish whether a NSIP represents the best option, except that:
- Applicants are obliged to include in their ES, as a matter of fact, information about the main alternatives they have studied. This should include an indication of the main

reasons for the applicant's choice, taking into account the environmental, social and economic effects and including, where relevant, technical and commercial feasibility.

- In some cases, there are specific legislative requirements, notably under the Habitats Directive, for the SoS to consider alternatives. These should be identified in the ES by the applicant.
- 4.2.14 In some circumstances, the relevant energy NPSs may impose a policy requirement to consider alternatives – EN-1 does in Sections 5.3, 5.7 and 5.9 in relation to avoiding significant harm to biodiversity and geological conservation interests, flood risk and development within nationally designated landscapes, respectively.
- 4.2.15 In terms of alternative sites, the Proposed Project comprises physical works to increase the electrical output and efficiency of the Consented Development, and therefore alternative sites were not considered.
- 4.2.16 Information relating to the main alternatives that the Applicant has considered in relation to the Proposed Project are set out at ES Volume I Chapter 3, 'Alternatives (Document Ref: 6.2). This considers the 'Do Nothing' Scenario, in addition to the following main reasonable design alternatives:
- (a) Applying for an extension between 50MW and 60MW.
 - (b) Applying for 60MW (this is the option selected for the Proposed Project).
 - (c) Applying for more than 60MW.
- 4.2.17 Option (a) would not deliver the full efficiency gain potential together with the increase in electrical output, and would also not be commercially viable. Option (c) would increase the throughput of waste and HGV traffic, resulting in increased emissions and traffic. For these reasons, as set out in more detail in ES Volume I Chapter 3, 'Alternatives', these alternatives have been dismissed by the Applicant in favour of Option (b).

Criteria for "good design" in energy infrastructure (NPS EN-1, 4.5; EN-3, 2.4-2.5)

- 4.2.18 EN-1 (paragraph 4.5.1) recognises that the functionality of buildings and infrastructure, including fitness for purpose and sustainability, are as equally important as visual appearance and aesthetic considerations. It goes on to state that applying 'good design' to energy NSIPs should produce sustainable infrastructure sensitive to place, efficient in the use of natural resources and energy used in their construction and operation, matched by an appearance that demonstrates 'good aesthetic' as far as possible. It is however acknowledged that *"...the nature of much energy infrastructure development will often limit the extent to which it can contribute to the enhancement of the quality of an area"*.
- 4.2.19 Paragraph 4.5.3 confirms that in assessing applications, the SoS will need to be satisfied that energy infrastructure developments are sustainable and, having regard to regulatory and other constraints, are as attractive, durable and adaptable (including taking account of natural hazards such as flooding) as they can be. In doing so, it goes on to state that the SoS should be satisfied that:
- "...the applicant has taken into account both functionality (including fitness for purpose and sustainability) and aesthetics (including its contribution to the quality of the area in which it would be located) as far as possible. Whilst the applicant may not have any or very limited choice in the physical appearance of some energy infrastructure, there may be opportunities for the applicant to demonstrate good design in terms of siting relative to existing landscape character, landform and vegetation. Furthermore, the design and sensitive use of materials in any associated development such as electricity substations will assist in ensuring that such development contributes to the quality of the area"*.
- 4.2.20 Paragraph 4.5.4 stresses the importance of applicants being able to demonstrate in their application documents how the design process was conducted and how the proposed

design evolved. However, it also makes clear that in considering applications, the SoS should take into account the ultimate purpose of the infrastructure and bear in mind the operational, safety and security requirements, which the design has to satisfy.

- 4.2.21 Proposals for renewable energy infrastructure should demonstrate good design in respect of landscape and visual amenity, and in the design of the project to mitigate impacts such as noise and effects on ecology (paragraph 2.4.2, EN-3).
- 4.2.22 EN-3 also states that *“good design that contributes positively to the character and quality of the area will go some way to mitigate adverse landscape/visual effects. Development proposals should consider the design of the generating station, including the materials to be used in the context of the local landscape”* (Paragraph 2.5.50).
- 4.2.23 The works associated with the Proposed Project will be located predominately within the boiler house and turbine hall of the Slough Multifuel Facility. The only external works will be a single pipe run between these two buildings. A Design and Access Statement has not therefore been submitted as part of the Application on the basis that the Proposed Project is solely for engineering works that will not alter the external appearance of the Consented Development. Relevant design details are shown on the Multifuel Facility Plans (Document Ref. 4.4).
- 4.2.24 ES Volume I Chapter 3, 'Alternatives' (Document Ref: 6.2) considers the alternative design scenarios for Proposed Project. Section 3 confirms that the proposed material for the external pipe has been driven by engineering requirements and the colour has been chosen to blend in with other consented pipework on the pipe rack. Accordingly, no reasonable alternatives for colour or pipe design were considered.
- 4.2.25 It is therefore considered that the Proposed Project is appropriate in design terms.

Consideration of combined heat and power ('CHP') (NPS EN-1, 4.6; and EN-3, 2.5.26)

- 4.2.26 The Proposed Project will increase the efficiency and electrical output of a consented multifuel CHP generating station, consistent with paragraph 4.6.7 in EN-1 and paragraph 2.5.26 in EN-3. The SoS should therefore give substantial additional positive weight to the Application, given that it will help deliver a more efficient CHP facility without increasing the throughput of waste or changing the environmental effects of the Consented Development.

Carbon Capture Readiness ('CCR') (NPS EN-1, 4.7 and EN-3, 2.5.28/29)

- 4.2.27 Government policy/criteria on CCR for new combustion generating stations is applicable to those with a generating capacity at or over 300MW and as such is not applicable to the Proposed Project (EN-3, 2.5.28/29; EN-1, 4.7).

Climate change adaptation (NPS EN1, 4.8; EN-3, 2.3)

- 4.2.28 Paragraphs 4.8.1 to 4.8.13 in EN-1 assert that the SoS must consider the UK Climate Projections available at the time that the applicant's ES is prepared to ensure appropriate mitigation is proposed. The emissions scenario from the Climate Change Committee should be used as the minimum. It clarifies that adaptation measures should use the most up to date Climate Change Risk Assessment and consultation should be undertaken with the Environment Agency.
- 4.2.29 In addition, paragraph 4.9.5 in the Draft NPS EN-1 states that “In preparing measures to support climate change adaptation, applicants should consider whether nature-based solutions could provide a basis for such adaptation”.
- 4.2.30 ES Volume I Chapter 11, 'Climate Change and Sustainability' (Document Ref: 6.2) provides an assessment of the potential effects of the construction and operation (including maintenance) of the Proposed Project in terms of climate change and

sustainability. It concludes that consideration of the effects of the Proposed Project, together with other developments on Greenhouse Gas ('GHG') emissions, is considered to be "...negligible or beneficial and therefore no cumulative effects are anticipated in respect of the Climate during the construction and operational phases".

- 4.2.31 The Proposed Project is therefore considered consistent with Sections 4.8 in EN-1, 2.3 in EN-3, and paragraph 4.9.5 in draft NPS EN-1.

Grid connection (NPS EN-1, 4.9; and EN-3, 2.5.22/23)

- 4.2.32 Details regarding how the Consented Development is to be connected into the transmission network, and an assessment of the environmental issues arising from the connection, were provided as part of the planning applications submitted under the TCPA (see Section 2 of this Planning Statement). The Proposed Project will not alter the grid connection arrangements. Nevertheless, the Application includes a Grid Connection Statement (Document Ref. 5.5) setting out how the Slough Multifuel Facility will connect to the electricity grid. It is therefore considered that the Application satisfies Section 4.9 in EN-1, and paragraphs 2.5.22/23 in EN-3.

Pollution control and other environmental regulatory regimes (NPS EN-1, 4.10, 5.2, EN-3, 2.5.37-45)

- 4.2.33 Section 4.10 of EN-1 (paragraph 4.10.1) advises that issues relating to discharges or emissions which affect air quality, water quality, land quality or noise and vibration may be subject to separate regulation under the pollution control framework or other consenting and licensing regimes.
- 4.2.34 Paragraph 4.10.3 states that in considering an application for development consent, the SoS should focus on whether the development itself is an acceptable use of the land, and on the impacts of that use, rather than the control of processes, emissions and discharges themselves. The SoS should work on the basis that the relevant pollution control regime and other environmental regulatory regimes will be properly applied and enforced by the relevant regulator.
- 4.2.35 Compliance with the Waste Incineration Directive (WID) (now part of the Industrial Emission Directive) is enforced through the environmental permitting regime regulated by the EA. Where a proposed development meets requirements of WID and will not exceed local air quality standards, the decision maker should not regard the development as having adverse impacts on health; the EA will determine if the proposed generating station is considered Best Available Techniques (BAT) (EN-3, 2.5.37 to 45; EN-1, 4.10, 5.2).
- 4.2.36 No significant air quality effects have been identified in relation to the construction of the Proposed Project. The application of good practice controls and mitigation already employed for the Consented Development will reduce potential effects at receptors to a not significant level.
- 4.2.37 In terms of operational air quality effects, the Proposed Project does not introduce any new emissions or change the exhaust gas parameters compared to the future baseline scenario and therefore the impact of the Proposed Project at all receptors results in no change from the Consented Development.
- 4.2.38 The effects of emissions from the Proposed Project on humans (in terms of impacts on human health) and designated ecological sites is neutral and therefore not significant. Additionally, the Proposed Project does not introduce any new odour sources on site or change those associated with the Consented Development.
- 4.2.39 Finally, no specific additional mitigation has been identified as necessary for the decommissioning and demolition phase of the Proposed Project at this stage and no significant effects have been identified.

4.2.40 In terms of flood risk, drainage and surface water, there will be no additional water consumption or water discharge to that of the Consented Development as a result of the Proposed Project. In fact, it is expected that as a result of the Proposed Project there will actually be a reduction in relation to the cooling load, therefore resulting in a negligible effect which is not significant. This is further detailed in ES Volume I Chapter 3, 'Other issues' (Document Ref. 6.2.12).

4.2.41 The Proposed Project is therefore considered to be in accordance with policy in relation to pollution control and other environmental regulatory regimes, namely NPS EN-1, Section 4.10 and 5.2 and EN-3, paragraphs 2.5.37 to 45.

Safety (NPS EN-1, 4.11) and Control of Major Accident Hazards (EN-1, 4.11)

4.2.42 EN-1 paragraph 4.11.1 states that the Health and Safety Executive ('HSE') is responsible for enforcing a range of health and safety legislation, some of which is relevant to the construction, operation and decommissioning of energy infrastructure. Applicants should consult with the HSE on matters relating to safety.

4.2.43 Paragraph 4.11.2 confirms that some energy infrastructure will be subject to the 'Control of Major Accident Hazards' ('COMAH') Regulations 2015. These are aimed at preventing major accidents involving dangerous substances and limiting the consequences to people and the environment of any that do occur.

4.2.44 The Proposed Project consists of external pipework, which will be located 18m above ground in a pipe rack that forms part of the Consented Development. ES Volume I Chapter 3, 'Other issues' (Document Ref. 6.2.12) concludes that, the potential vulnerability from natural disasters, including climate change effects (e.g. rising temperatures, storms and flooding) is not changed by the addition of the Proposed Project and does not change the vulnerability of the Consented Development. As such there is no change to major accidents associated with the Proposed Project over the low risk of occurrence for the Consented Development. The Proposed Project is therefore in accordance with Section 4.11 in EN-1.

Hazardous Substances (NPS EN-1, 4.12)

4.2.45 The Proposed Project comprises physical works which will facilitate an increase in the efficiency and gross installed capacity of the consented generating station from just under 50MW to circa 60MW. It will not involve any hazardous substances and as such there is no change from the Consented Development.

Health (NPS EN-1, 4.13 and Draft NPS EN-1, 4.3.5)

4.2.46 Paragraph 4.13.3 in EN-1 confirms that "...direct impacts on health may include increased traffic, air or water pollution, dust, odour, hazardous waste and substances, noise, exposure to radiation, and increases in pests".

4.2.47 Paragraph 4.3.5 in the Draft NPS EN-1 asserts that "*Opportunities should be taken to mitigate indirect impacts on health by promoting local improvements to encourage health and wellbeing including in respect of potential impacts on vulnerable groups within society*".

4.2.48 The Proposed Project will not result in any significant residual air quality or noise and vibration effects, as demonstrated by Chapter 8 'Air Quality' and Chapter 9 'Noise and Vibration' of the ES Volume I (Document Ref. 6.2.9).

4.2.49 As confirmed above, the Proposed Project will not introduce any new odour sources on site or change the intensity or nature of any predicted odour associated with the Consented Development.

4.2.50 The management of dust and particulates and application of adequate mitigation measures will be enforced through the existing Consented Development CEMP (Document Ref. 6.4.4).

4.2.51 Furthermore, the Proposed Project will comply with all relevant health, safety, and environmental legislation.

Common law nuisance and statutory nuisance (NPS EN-1, 4.14)

4.2.52 The Proposed Project is not anticipated to give rise to any nuisance arising under the provisions of Section 79(1) of the Environmental Protection Act 1990. Chapter 14 'Summary of Environmental Effects' of the ES Volume I (Document Ref. 6.2) concludes that the Proposed Project will not give rise to any significant adverse environmental effects following the application of mitigation.

4.2.53 The Application includes a Statutory Nuisance Statement (Document Ref. 5.3).

Security considerations (NPS EN-1, 4.15)

4.2.54 Paragraph 4.15.1 states that national security considerations apply across all national infrastructure sectors. Paragraph 4.15.2 goes on to state that Government policy is to ensure that, where possible, proportionate protective security measures are designed into new infrastructure developments at an early stage.

4.2.55 Where applications for development consent for infrastructure relate to potentially critical infrastructure, there may be national security considerations, which will be identified to the relevant government department (BEIS) by the Centre for Protection of National Infrastructure.

4.2.56 The Consented Development benefits from perimeter fencing and is fully secured with closed circuit TV, gatehouse reception and manned continuously with constant site patrols and controlled access to buildings. Given that the Proposed Project comprises of external pipe work, which will be located 18m above ground in a Consented Development pipe rack, no further security measures are required.

4.2.57 The Proposed Project is therefore considered to accords with the key assessment principles of the existing relevant energy NPSs.

4.3 Generic impacts

4.3.1 The 'generic impacts' set out in Part 5 of EN-1 are considered below in **Table 4.1**. Where the same impacts appear in the 'technology-specific information' parts of EN-3 they are also dealt with below and the relevant part of the NPS is referenced.

Table 4.1 – Generic Impacts

Generic Impact	Summary	Assessment
Air quality and emissions (EN-1, 5.2; EN-3, 2.5.37 – 2.5.45)	<p>EN-1 acknowledges that air quality and emissions are likely to be a key area of concern when assess the development of generating stations.</p> <p>Paragraphs 5.2.6 and 5.2.7 of EN-1 set out the requirements for applicants to assess issues relating to air quality and emissions as part of an ES.</p> <p>EN-1 states that the ES should describe:</p> <p><i>“...any significant air emissions, their mitigation and any residual effects distinguishing between the Proposed Development stages and taking account of any significant emissions from any road traffic generated by the Proposed Development; the predicted absolute emission levels of the proposed Development, after mitigation methods have been applied; existing air quality levels and the relative change in air quality from existing levels; and and potential eutrophication impacts”.</i></p> <p>Paragraph 5.2.9 states that air quality considerations will be given substantial weight where a Proposed Development would lead to deterioration in air quality in an area, or leads to a new area where air quality breaches any national air quality limits. Air quality considerations will also be important where substantial changes in air quality levels are expected, even if this does not lead to any breaches of national air quality limits.</p> <p>Paragraph 5.2.10 requires decisions to take account of any relevant statutory air quality limits. Where the limits would be breached, developers should work with the relevant authorities to</p>	<p>The Application is supported by an air quality assessment contained within Chapter 8 ‘Air Quality’ of the Environmental Statement (‘ES’) Volume I (Document Ref. 6.2.8), which considers the impact of the Proposed Project in terms of NOx, SOx and particulates.</p> <p>This concludes that, following mitigation through the implementation of the Construction Environmental Management Plan (‘CEMP’) for the Consented Development (Document Ref. 6.4.4), there will be no significant air quality effects identified during construction, operation or decommissioning of the Proposed Project. The management of dust and particulates and application of adequate mitigation measures will be enforced through the existing CEMP.</p> <p>An assessment of the carbon dioxide emissions is provided in Chapter 11 ‘Climate’ of the ES Volume I (Document Ref. 6.2.11). This concludes that the proposals will contribute to reducing GHG emissions relative to a comparable baseline consistent with a trajectory towards net zero by 2050.</p>

Generic Impact	Summary	Assessment
	<p>secure appropriate mitigation measures to allow the proposal to proceed.</p> <p>Consideration should be given to whether mitigation measures are needed for both operational and construction emissions. A construction management plan may help codify mitigation.</p> <p>Paragraph 2.5.38 in EN-3 states that “CO2 emissions may be a significant adverse impact of biomass/waste combustion plant. Although an ES on air emissions will include an assessment of CO2 emissions, the policies set out in Section 2.2 of EN-1 will apply. The IPC [now the SoS] does not, therefore need to assess individual applications in terms of carbon emissions against carbon budgets and this section does not address CO2 emissions or any Emissions Performance Standard that may apply to plant”.</p> <p>Paragraph 2.5.39 confirms that in addition to the air quality legislation referred to in EN-1 the Waste Incineration Directive (WID) is also relevant to waste combustion plant as this sets out specific emission limit values for waste combustion plants. Paragraph 2.5.40 in EN-3 confirms that the applicant’s EIA should include an assessment of the air emissions resulting from the proposed infrastructure and demonstrate compliance with the relevant regulations (see Section 5.2 of EN-1).</p> <p>Paragraph 2.5.41 continues that the compliance with the WID and the Large Combustion Plant Directive² (LCPD) is enforced through the environmental permitting regime regulated by the</p>	

² Large Combustion Plant Directive 2001/80/EC can be found at: http://eur-lex.europa.eu/LexUriServ/site/en/oj/2001/l_309/l_30920011127en00010021.pdf

Generic Impact	Summary	Assessment
	<p>Environment Agency (EA). Plants not meeting the requirements of the WID and/or LCPD would not be granted a permit to operate. The IPC should refer to the policy in Section 4.10 of EN-1 relating to other regimes.</p> <p>Paragraph 2.5.42 in EN-3 continues that the pollutants of concern arising from the combustion of waste and biomass include NOx³, Sox⁴, particulates and CO2. In addition emissions of heavy metals, dioxins and furans are a consideration for waste combustion generating stations but limited by the WID and regulated by the EA.</p> <p>EN-3 asserts that where a proposed waste combustion generating station meets the requirements of WID and will not exceed the local air quality standards, the SoS should not regard the proposed waste generating station as having adverse impacts on health, (paragraph 2.5.43).</p> <p>Paragraph 2.5.45 in EN-3 states that <i>“The EA will determine if the technology selected for the waste/ biomass combustion generating station is considered Best Available Technique (BAT) and therefore the IPC does not need to consider equipment selection in its determination process”</i>.</p>	
Biodiversity and geological	Paragraph 5.3.18 of EN-1 states that during construction appropriate mitigation measures should be included to ensure that activities will be confined to the minimum areas required for	The ecological impact of the Proposed Project is considered within Chapter 10 ‘Ecology’ of the ES Volume I (Document Ref. 6.2.10). This concludes that

³ Oxides of nitrogen.

⁴ Sulphur oxides.

Generic Impact	Summary	Assessment
conservation (EN-1, 5.3)	<p>the works and to ensure that the risk of disturbance or damage to species is minimised.</p> <p>Paragraph 5.3.18 of EN-1 also states that, during operation, appropriate mitigation measures should be included to ensure that the risk of disturbance or damage to species is minimised. Development should aim to avoid significant harm to biodiversity and geological conservation interests through mitigation and consideration of reasonable alternatives.</p>	<p>the Proposed Project will not result in any significant ecological effects on ecology during construction, operation, or decommissioning. The Proposed Project is therefore considered to fully accord with Paragraph 5.3.18 of EN-1.</p> <p>There are no geological interest or conservation features at the Site.</p>
Civil and military aviation and defence interests (EN-1, 5.4)	<p>EN-1, Section 5.4 notes that civil and military aerodromes and aviation technical sites, as well as other types of defence interests can be affected by new energy developments.</p>	<p>Given the limited scale and modest nature of the additional physical works comprised in the Proposed Project and the fact that these will not increase the overall height of the Multifuel Facility, it will not have any implications for civil and military aerodromes and aviation technical sites, or other types of defence interests.</p>
Dust, odour, artificial light, smoke and steam (EN-1, 5.6; EN-3, 2.5.59 – 5.2.63)	<p>NPS EN-1 acknowledges that the construction/demolition, operation and decommissioning of energy infrastructure has the potential to affect air quality through the release of odour, dust, steam, smoke and artificial light.</p> <p>Paragraph 5.6.5 of EN-1 provides advice regarding the assessment of these impacts. It is advised that the assessment should describe:</p> <ul style="list-style-type: none"> the type, quantity and timing of emissions; aspects of the development which may give rise to emissions; 	<p>Table 14.1 'Summary of Environmental Effects' at Chapter 14 of the ES Volume I (Document Ref. 6.2.14), demonstrates that no significant adverse effects are anticipated in relation to the Proposed Project during either construction, operation or decommissioning.</p> <p>The air quality effects and carbon emissions arising from the Proposed Project are specifically considered earlier in this table, but following mitigation, neither are significant in terms of effects.</p> <p>The Consented Development already makes provision for the control of vermin and other pests by enclosing all WDF handling activities; storing WDF for the minimum period possible; use of enclosed containers,</p>

Generic Impact	Summary	Assessment
	<ul style="list-style-type: none"> premises or locations that may be affected by the emissions; effects of the emissions on identified premises or locations; and measures to be employed in preventing or mitigating the emissions. <p>Paragraph 5.6.7 of EN-1 states that, in decision making, the SoS should be satisfied that an assessment of the potential effects in respect of artificial light, dust, odour, smoke and steam has been carried out; and be satisfied that all reasonable steps have been taken to minimise any detrimental impacts.</p> <p>Paragraph 2.5.59 in EN-3 confirms that “...<i>insect and vermin infestation may be a particular issue with regard to storage of fuels for EfW generating stations as they may be attracted to biodegradable waste stored and processed at the facility. Odour is also likely to arise during the reception, storage and handling/processing of incoming biodegradable waste</i>”.</p> <p>Paragraph 2.5.60 states that applicants should assess the potential for insect infestation and emissions of odour as set out in EN-1 Section 5.6 with particular regard to the handling and storage of waste for fuel.</p> <p>Paragraph 2.5.61 also asserts that the SoS should satisfy him or herself that the proposal sets out appropriate measures to minimise impacts on local amenity from odour, insect and vermin infestation.</p> <p>Paragraph 2.5.62 continues that, in addition to the mitigation measures set out in EN-1, reception, storage and handling of</p>	<p>silos etc; inspection/pest control management; use of approved chemicals/pesticides; regular cleaning of the fuel tipping area; regular inspections and disposal of litter.</p> <p>The Proposed Project will not alter the situation with regard to vermin and pest control for the Consented Development; nor will it increase the throughput of waste.</p>

Generic Impact	Summary	Assessment
	<p>waste and residues should be carried out within defined areas, for example bunkers or silos, within enclosed buildings at EfW generating stations.</p> <p>To minimise potential for infestation, paragraph 2.5.63 in EN-3 states that the time between reception, processing and combustion of waste may be limited by consent requirements.</p>	
Flood risk (EN-1, 5.7)	Paragraph 5.7.4 of EN-1 requires that applications for energy developments of 1 hectare or greater in Flood Zone 1 in England and all proposals for energy developments located in Flood Zones 2 and 3 in England should be accompanied by a Flood Risk Assessment ('FRA').	Chapter 12 'Other Issues' of the ES Volume I (Document Ref. 6.2.12) considers flood risk. It confirms that as there will be no additional water discharge to that of the Consented Development, the Proposed Project will not result in any significant flood risk effects.
Historic environment (EN-1, 5.8; EN-3, 2.5.34)	<p>Section 5.8 of EN-1 acknowledges that the construction, operation and decommissioning of energy infrastructure has the potential to result in adverse impacts on the historic environment.</p> <p>Paragraph 5.8.8 requires applicants to provide a description of the significance of the heritage assets affected by the proposed development and the contribution of their setting to that significance.</p> <p>Where a development site affects, or possibly includes heritage assets with an archaeological interest, the applicant should carry out an appropriate desk-based assessment.</p> <p>The extent of the impact of the proposed development on the significance of any heritage asset affected should be able to be adequately understood from the application documents.</p>	<p>Chapter 6 'EIA Methodology' of the ES Volume I (Document Ref. 6.2.6), explains that PINS agreed in its Scoping Opinion that cultural heritage could be scoped out of the ES on the basis of:</p> <ul style="list-style-type: none"> the limited extent of external engineering works comprised within the Proposed Project, in the context of the Consented Development; and the lack of any below ground interventions required for the works comprised within the Proposed Project. <p>Additionally, the ES prepared for the Consented Development concluded that there were no significant residual effects in terms of cultural heritage and archaeology and that no specific mitigation measures needed to be factored in to reach that conclusion. In view of that finding, it was considered by PINS that no</p>

Generic Impact	Summary	Assessment
	<p>Paragraph 5.8.11 states that the SoS should assess the significance of any heritage asset that may be affected by the proposed development, taking account of:</p> <ul style="list-style-type: none"> • evidence provided with the application; • any designation records; • the Historic Environment Record; • the heritage assets themselves; • the outcome of consultations with interested parties; and • where appropriate, expert advice. <p>Paragraph 2.5.34 in EN-3 states that in considering the impact on the historic environment as set out in Section 5.8 of EN-1 and whether it is satisfied that the substantial public benefits would outweigh any loss or harm to the significance of a designated heritage asset, the SoS should take into account the positive role that large-scale renewable projects play in the mitigation of climate change, the delivery of energy security and the urgency of meeting the national targets for renewable energy supply and emissions reductions.</p>	<p>assessment of cultural heritage was required in the EIA.</p>
<p>Landscape and Visual (EN-1, 5.9; EN-3, 2.5.46-2.5.52)</p>	<p>Section 5.9 of EN-1 states that adverse landscape and visual effects may be minimised through appropriate siting of infrastructure, materials and design, and landscaping schemes.</p> <p>Paragraph 5.9.15 states that the SoS should judge whether any adverse impact on the landscape would be so damaging that it is not offset by the benefits of the proposed development.</p>	<p>Chapter 6 'EIA Methodology' of the ES Volume I (Document Ref. 6.2.6), explains why landscape and visual amenity was scoped out of the EIA. On the basis of the limited extent of the external works comprised within the Proposed Project, as well as its setting within an existing and long-established industrial estate in a built-up urban area, PINS agreed with the Applicant's Scoping Report that this aspect could be scoped out.</p>

Generic Impact	Summary	Assessment
	<p>Paragraph 5.9.17 states that the SoS should consider the design of the development, taking account of environmental effects on the landscape and siting, operational and other relevant constraints, to minimise harm to the landscape, including by reasonable mitigation.</p> <p>Paragraph 5.9.18 recognises that all proposed energy infrastructure is likely to have visual effects for receptors around proposed sites; however, in determining proposals, a judgement is to be made as to whether the visual effects on sensitive receptors outweigh the benefits of the development.</p> <p>Paragraph 2.5.46 in EN-3 confirms that the SoS should be satisfied that the design of the proposed generating station is of appropriate quality and minimises adverse effects on the landscape character and quality.</p> <p>Paragraph 2.5.48 in EN-3 states that an assessment of the landscape and visual effects of the proposed infrastructure should be undertaken in accordance with the policy set out in 5.9 of EN-1.</p> <p>Paragraphs 2.5.49 in EN-3 confirms that the SoS should take into account that any biomass/waste combustion generating station will require a building able to host fuel reception and storage facilities, the combustion chamber and abatement units.</p> <p>Paragraph 2.5.50 in EN-3 asserts that good design that contributes positively to the character and quality of the area will go some way to mitigate adverse landscape/visual effects. It continues that development proposals should consider the design of the generating station, including the materials to be used in the context of the local landscape.</p>	<p>It was also acknowledged by PINS in the Scoping Opinion that the ES prepared for the Consented Development included mitigation effectively embedded as part of the design evolution with a view to minimising landscape and visual effects. That ES concluded that there were no significant landscape effects during construction or operation.</p> <p>The Proposed Project is almost hidden from all sides at ground level and will lead to a negligible change in appearance of the Consented Development. On this basis it is considered that there will be no change in landscape and visual effects from the Consented Development.</p> <p>The Scoping Opinion does state that that the ES should demonstrate that the <i>“increased operational hours would not result in visible plume effects beyond those assessed as part of the consented scheme which could be significant”</i>. As mentioned above, no change is proposed in operational hours and therefore the Proposed Project will not result in a change in visible plume effects.</p>

Generic Impact	Summary	Assessment
	<p>Paragraph 2.5.51 in EN-3 confirms that mitigation is achieved primarily through aesthetic aspects of site layout and building design including size and external finish and colour of the generating station to minimise intrusive appearance in the landscape as far as engineering requirements permit. The precise architectural treatment will need to be site-specific.</p> <p>Paragraph 2.5.52 in EN-3 confirms that the SoS should expect applicants to seek to landscape waste/biomass combustion generating station sites to visually enclose them at low level as seen from surrounding external viewpoints. This makes the scale of the generating station less apparent, and helps conceal its lower level, smaller scale features.</p>	
Land use including open space, green infrastructure and Green Belt (EN-1, 5.10)	<p>EN-1 notes at Section 5.10 that as energy infrastructure Proposed Developments will have direct effects on the existing use of the proposed site and may have indirect effects on the use, or planned use, of land in the vicinity for other types of development.</p> <p>Paragraph 5.10.3 recognises that it may not be possible for many forms of energy infrastructure to be sited on previously developed land, while paragraph 5.10.5 requires applicants to assess the effects of the proposed development on existing land uses at and near the site.</p> <p>Paragraph 5.10.9 requires applicants to safeguard any mineral resources on the proposed site as far as possible, taking into account the long-term potential of the land use after any future decommissioning has taken place.</p> <p>Paragraph 5.10.9 states mitigation measures should be considered for development affecting green infrastructure to</p>	The Proposed Project does not involve in any change in land use at the Site, affect open space, green infrastructure or involve land within a Green Belt. There is no change from the Consented Development.

Generic Impact	Summary	Assessment
	ensure the connectivity of the green infrastructure network is maintained.	
Noise and vibration (EN-1, 5.11; EN-3. 2.5.53-2.5.58)	<p>EN-1 (Section 5.11) requires a noise assessment for development that is likely to cause noise impacts through operational use and proximity to noise sensitive receptors.</p> <p>Paragraph 5.11.8 of EN-1 requires demonstration of good design through selection of the quietest cost-effective plant available; containment of noise within buildings wherever possible; optimisation of plant layout to minimise noise emissions and, where possible, the use of landscaping, bunds or noise barriers to reduce noise transmission.</p> <p>Paragraph 5.11.9 goes on to state that developments should:</p> <ul style="list-style-type: none"> • avoid significant adverse impacts on health and quality of life from noise; • mitigate and minimise other adverse impacts on health and quality of life from noise; and, • where possible contribute to improvements to health and quality of life through the effective management and control of noise. <p>Generic noise and vibration impacts are covered in detail in Section 5.11 of EN-1. In addition, there are specific considerations which apply to biomass and EfW generating stations as set out below. Sources of noise and vibration may include:</p> <ul style="list-style-type: none"> • delivery and movement of fuel and materials; • processing waste for fuel at EfW generating stations; 	Chapter 9 'Noise and Vibration' of the ES Volume I (Document Ref. 6.2.9) concludes that the Proposed Project will not result in any significant noise or vibration effects following the application of mitigation through the implementation of the CEMP for the Consented Development (Document Ref. 6.4.4), during either the construction, operation or decommissioning phase.

Generic Impact	Summary	Assessment
	<ul style="list-style-type: none"> the gas and steam turbines that operate continuously during normal operation; and external noise sources such as externally-sited air-cooled condensers that operate continuously during normal operation. <p>Paragraph 2.5.54 in EN-3 confirms that the ES should include a noise assessment of the impacts on amenity in case of excessive noise from the project as described in Section 5.11 in EN-1.</p> <p>Paragraph 2.5.55 in EN-3 states that the SoS should consider the noise and vibration impacts according to Section 5.11 in EN-1. He or she should be satisfied that noise and vibration will be adequately mitigated through requirements attached to the consent. The SoS will need to take into consideration the extent to which operational noise will be separately controlled by the EA. Paragraph 2.5.56 in EN-3 states that the SoS should not grant development consent unless he or she is satisfied that the proposals will meet the aims set out in paragraph 5.11.9 in EN-1.</p> <p>Paragraph 2.5.57 in EN-3 states that the primary mitigation for noise for biomass and EfW generating stations is through good design to enclose plant and machinery in noise-reducing buildings, wherever possible, and to minimise the potential for operations to create noise. It continues that noise from gas turbines should be mitigated by attenuation of exhausts to reduce any risk of low-frequency noise transmission.</p> <p>Paragraph 2.5.58 in EN-3 confirms that noise from features including sorting and transport of material during operation of biomass or EfW generating stations is unavoidable. Similarly, noise from apparatus external to the main generating station may</p>	

Generic Impact	Summary	Assessment
	be unavoidable. This can be mitigated through careful plant selection.	
Socio-economic (EN-1, 5.12)	<p>Paragraph 5.12.1 of EN-1 accepts that the construction, operation and decommissioning of energy infrastructure may have socio-economic impacts at local and regional levels.</p> <p>Paragraph 5.12.3 asserts that the assessment within the ES should consider all relevant socio-economic impacts.</p> <p>Paragraph 5.12.6 confirms that decision maker will have regard to the potential socio-economic impacts of new energy infrastructure.</p> <p>Paragraph 5.12.9 states that it should be considered whether mitigation measures are necessary to mitigate any adverse socio-economic impacts of a development.</p>	<p>Chapter 6 'EIA Methodology' of the ES Volume I (Document Ref. 6.2.6) states that, whilst there will be some minimal changes to employment through the additional 20 staff for two months during construction of the Proposed Project, there are no changes to operational staff numbers (over those proposed for the Consented Development). Accordingly, the Proposed Project is not anticipated to have any significant socio-economic effects.</p> <p>PINS agreed in the Scoping Opinion that socio-economic effects of the proposed engineering works that are comprised in the Proposed Project are unlikely to be significant. On this basis, it was concluded that no further assessment of socio-economics was required.</p>
Traffic and transport (EN-1, 5.13; EN-3, 2.5.13)	<p>EN-1 (paragraph 5.13.3) states that if a Proposed Development is likely to have significant transport implications, the applicant's ES should include a transport assessment, using the NATA/WebTAG methodology stipulated in Department for Transport guidance, or any successor to such methodology.</p> <p>Applicants should also consult the Highways England and highway authorities as appropriate on the assessment and mitigation.</p> <p>Paragraph 5.13.4 requires applicants to prepare a travel plan including demand management measures to mitigate transport impacts.</p>	<p>The fuel tonnage and residual ash associated with the Consented Development will not increase as a result of the Proposed Project, and therefore there will be no increase in operational vehicle movements to and from the Site.</p> <p>Chapter 7 'Transport and Access' of the ES Volume I (Document Ref. 6.2.7) concludes that the Proposed Project will not result in any significant effects during either construction, operation or decommissioning.</p> <p>The Section 106 Deed of Variation for the Consented Development (dated 17 November 2020) limits the total</p>

Generic Impact	Summary	Assessment
	<p>Paragraph 5.13.6 also requires applicants to include mitigation measures to sufficiently reduce the impact on transport infrastructure to acceptable levels.</p> <p>Paragraph 2.5.13 in EN-3 states that throughput volumes are not, in themselves, a factor in decision-making as there are no specific minimum or maximum fuel throughput limits for different technologies or levels of electricity generation. This is a matter for the applicant. However, the increase in traffic volumes, any change in air quality, and any other adverse impacts as a result of the increase in throughput should be considered by the decision maker in accordance with this NPS and balanced against the net benefits of the combustion of waste and biomass, as described in paragraph 2.5.2 above and in Section 3.4 of EN-1</p>	<p>number of HGV movements to 100,000 per year⁵. Also, there will be no change to staff numbers during the operational phase, and therefore there will be no impact on transport and access during the operational phase.</p> <p>Since there will be no increase in staff numbers, the Section 106 obligation for an operational Travel Plan for the Consented Development will apply equally to the Proposed Project. The Applicant is prepared to enter into a further Deed of Variation to ensure that the DCO is bound by the terms of the existing Section 106 obligations.</p> <p>Additionally, as confirmed earlier in this table, the Proposed Project will not result in any significant air quality effects (including from traffic), following the application of mitigation, as confirmed in Chapter 8 'Air Quality' of the ES Volume I (Document Ref. 6.2.8) – therefore according with Paragraph 2.5.13 in EN-3.</p>
Waste management (EN-1, 5.14, EN-3; 2.5.64-2.5.83)	<p>Section 5.14 of EN-1 acknowledges that all large infrastructure Proposed Developments are likely to generate hazardous and non-hazardous waste.</p> <p>Paragraph 5.14.6 requires applicants to produce a Site Waste Management Plan and states that the applicant should seek to minimise the volume of waste produced and the volume of waste sent for disposal.</p>	<p>Importantly, the Proposed Project does not itself constitute an EfW plant, but rather will result in increased efficiency and electrical output from the Slough Multifuel Facility without increasing the hourly throughput of WDF, the quantity of waste products, or the number of approved deliveries.</p>

⁵ N.B. separate HGV movement shall be deemed to occur on the occasion of each separate arrival or departure of any HGV to or from the Site.

Generic Impact	Summary	Assessment
	<p>Paragraph 5.14.6 states the SoS should be satisfied that:</p> <ul style="list-style-type: none"> • waste will be properly managed, both on and off site; • can be dealt with appropriately by the available waste infrastructure; and • adequate steps have been taken to minimise the volume of waste. <p>Paragraph 2.5.64 in EN-3 confirms that waste combustion generating stations need not disadvantage reuse or recycling initiatives where the proposed development accords with the waste hierarchy.</p> <p>Paragraph 2.5.65 in EN-3 confirms that national, local and municipal strategies in England and Wales provide policy expectations for waste management at these different geographical levels. Local authorities will be responsible for providing an informative framework for the amount of waste management capacity sought. Information on the type of wastes arising and those that are combustible may also be provided.</p> <p>Paragraph 2.5.66 in EN-3 states that an assessment of the proposed waste combustion generating station should be undertaken that examines the conformity of the scheme with the waste hierarchy and the effect of the scheme on the relevant waste plan or plans where a proposal is likely to involve more than one local authority.</p> <p>Paragraph 2.5.67 in EN-3 confirms that the application should set out the extent to which the generating station and capacity</p>	<p>Neither will the Proposed Project lead to any significant increase in construction waste over and above that for the Consented Development.</p> <p>The existing approved CEMP (Document Ref. 6.4.4) includes water generation, segregation, and disposal in accordance with the waste hierarchy with references to compliance with the Hazardous Waste (England and Wales) Regulations 2005 (as amended) and the Waste (England and Wales) Regulations 2011. The existing CEMP which describes the mitigation measures relevant to, and to be followed by, the Consented Development, will be directly applicable to the Proposed Project and this will be secured by a requirement in the DCO.</p>

Generic Impact	Summary	Assessment
	<p>proposed contributes to the recovery targets set out in relevant strategies and plans, taking into account existing capacity.</p> <p>Paragraph 2.5.68 in EN-3 confirms that it may be appropriate for assessments to refer to the Annual Monitoring Reports published by relevant waste authorities which provide an updated figure of existing waste management capacity and future waste management capacity requirements.</p> <p>Paragraph 2.5.69 in EN-3 the results of the assessment of the conformity with the waste hierarchy and the effect on relevant waste plans should be presented in a separate document to accompany the application to the SoS.</p> <p>Paragraph 2.5.70 in EN-3 states that the decision maker should be satisfied, with reference to the relevant waste strategies and plans, that the proposed waste combustion generating station is in accordance with the waste hierarchy and of an appropriate type and scale so as not to prejudice the achievement of local or national waste management targets in England. Where there are concerns in terms of a possible conflict, evidence should be provided to the SoS by the applicant as to why this is not the case or why a deviation from the relevant waste strategy or plan is nonetheless appropriate and in accordance with the waste hierarchy.</p> <p>Paragraph 2.5.71 in EN-3 requires that generic waste management impacts are set out in Section 5.14 of EN-1. In addition, there are specific considerations which apply to waste and biomass combustion generating stations as set out below. All waste/biomass combustion generating stations will produce residues that require further management. Much of the residues can be used for commercial purposes.</p>	

Generic Impact	Summary	Assessment
	<p>Paragraph 2.5.72 in EN-3 states that generating stations that burn waste (even if mixed with biomass fuel) produce two types of residues:</p> <ul style="list-style-type: none"> • combustion residue is inert material from the combustion chamber. The quantity of residue produced is dependent on the technology process and fuel type but might be as much as 30% (in terms of weight) of the fuel throughput of the generating station; and • fly ash, a residue from flue gas emission abatement technology and usually 3-4% (in terms of weight) of the fuel throughput of the generating station. <p>Paragraph 2.5.73 in EN-3 states that under the WID the two residues from waste combustion generating stations cannot be mixed; they must be disposed of separately, under different regimes.</p> <p>Paragraph 2.5.75 in EN-3 confirms that the regulations on waste disposal for waste combustion and flue gas residues from biomass combustion are intended to reduce the amount of waste that is sent to landfill. Waste combustion fly ash is classified as a hazardous waste material and needs to be managed as such.</p> <p>Paragraph 2.5.76 in EN-3 confirms that waste management is covered in the Environmental Permit for operation of waste or biomass generating stations. (See Section 5.14 of EN-1.)</p> <p>Paragraph 2.5.77 in EN-3 states that the assessment should include the production and disposal of residues as part of the ES, and that any proposals for recovery of ash and mitigation measures should be described.</p>	

Generic Impact	Summary	Assessment
	<p>Paragraph 2.5.78 in EN-3 confirms that applicants should set out the consideration they have given to the existence of accessible capacity in waste management sites for dealing with residues for the planned life of the power station.</p> <p>Paragraph 2.5.81 in EN-3 states that the SoS should be satisfied that management plans for residue disposal satisfactorily minimise the amount that cannot be used for commercial purposes.</p> <p>Paragraph 2.5.82 in EN-3 states that the SoS should consider what requirements it may be appropriate to impose. If the EA has indicated that there are no known barriers to it issuing an Environmental Permit for operation of the proposed biomass/waste fuelled generating station and agrees that management plans suitably minimise the wider impacts from ash disposal, any residual ash disposal impacts should have limited weight.</p> <p>Paragraph 2.5.83 in EN-3 confirms that the environmental burdens associated with the management of combustion residues can be mitigated through recovery of secondary products, for example aggregate or fertiliser, rather than disposal to landfill. The SoS should give substantial positive weight to development proposals that have a realistic prospect of recovering these materials. The primary management route for fly ash is hazardous waste landfill. However, there may be opportunities to reuse this material for example in the stabilisation of industrial waste. The management of hazardous waste will be considered by the EA through the Environmental Permitting regime.</p>	

Generic Impact	Summary	Assessment
<p>Water quality and resources (EN-1, 5.15; EN-3, 2.5.84-2.5.87)</p>	<p>EN-1 (Section 5.15) states that, where a Proposed Development is likely to have effects on water quality and resources an assessment should be undertaken of the impacts of the Proposed Development.</p> <p>Paragraph 5.15.6 states that the SoS should be satisfied that Proposed Developments have regard to the River Basin Management Plans and meet the requirement of the Water Framework Directive and related directives, including those on priority substances and groundwater.</p> <p>Paragraph 5.15.9 states that the risk of impacts on the water environment can be reduced through careful design to facilitate adherence to good pollution control practice.</p> <p>Paragraph 2.5.84 in EN-3 states that generic water quality and resource impacts are set out in Section 5.15 of EN-1. The design of water-cooling systems for EfW and biomass generating stations will have additional impacts on water quality, abstraction and discharge. These may include:</p> <ul style="list-style-type: none"> • discharging water at a higher temperature than the receiving water, affecting the biodiversity of aquatic flora and fauna; • use of resources may reduce the flow of watercourses, affecting the rate at which sediment is deposited, conditions for aquatic flora and potentially affecting migratory fish species (e.g. salmon); • fish impingement and/or entrainment – i.e. being taken into the cooling system during abstraction; and 	<p>The Proposed Project will not result in any additional water consumption or water discharge to that of the Consented Development. It is expected that as a result of the Proposed Project there will actually be a reduction in relation to the cooling load. The Proposed Project will therefore not result in any impacts in terms of water quality, in addition to those arising from the Consented Development.</p>

Generic Impact	Summary	Assessment
	<ul style="list-style-type: none"> discharging water containing chemical anti-fouling treatment of water for use in cooling systems may have adverse impacts on aquatic biodiversity. <p>Paragraph 2.5.85 in EN-3 states that where the project is likely to have effects on water quality or resources the applicant should undertake an assessment as required in EN-1, Section 5.15. The assessment should particularly demonstrate that appropriate measures will be put in place to avoid or minimise adverse impacts of abstraction and discharge of cooling water.</p> <p>Paragraph 2.5.86 in EN-3 confirms that the SoS should be satisfied that the applicant has demonstrated measures to minimise adverse impacts on water quality and resources as described above and in EN-1.</p> <p>Paragraph 2.5.87 in EN-3 asserts that in addition to the mitigation measures set out in EN-1, design of the cooling system should include intake and outfall locations that avoid or minimise adverse impacts. There should also be specific measures to minimise fish impingement and/or entrainment and the discharge of excessive heat to receiving waters.</p>	

4.4 Technology specific considerations

- 4.4.1 The technology specific considerations of relevance to the Proposed Project that are contained within EN-3 (and that have not already been addressed in Table 4.1 above) are considered in **Table 4.2** below.

Table 4.2 – Technology Specific Considerations

Consideration	Summary	Assessment
Flexibility in the project details (EN-3, 2.5.30)	<p>Paragraph 2.5.30 confirms that the SoS should accept that biomass/waste combustion plant operators may not know the precise details of all elements of the proposed development until sometime after any consent has been granted. Where some details have not been included in the application, the applicant should explain which elements of the scheme have yet to be finalised and give the reasons.</p> <p>Therefore, some flexibility may be required in the consent. Where this is sought and the precise details are not known, then the applicant should assess the effects the project could have (as set out in EN-1 paragraph 4.2.8) to ensure that the project as it may be constructed has been properly assessed. In this way the maximum-adverse case scenario will be assessed and the SoS should allow for this uncertainty in its consideration of the application and consent.</p> <p>The technology specific considerations in relation to biomass and waste combustion impacts have been carried forward <i>verbatim</i> from EN-3 into Draft NPS EN-3, save for references to the “IPC” being updated to refer to the SoS.</p>	<p>The Proposed Project involves limited physical works to the Consented Development. It does not in itself constitute an EfW plant, rather it is an extension to a consented plant that will increase its efficiency and electrical output. It is therefore considered that this technology specific consideration, within EN-3 is of limited relevance to the Proposed Project.</p>

4.4.2 Tables 4.2 and 4.3 demonstrate that there is no conflict between the Proposed Project and the relevant generic and technology specific impacts in EN-1 and EN-3.

4.5 The National Planning Policy Framework (Ministry of Housing, Communities & Local Government, July 2021)

4.5.1 The National Planning Policy Framework ('NPPF'), introduced in March 2012 (updated July 2021), sets out the Government's planning policies for England. It is a material consideration in planning decisions. The NPPF is supported by the National Planning Practice Guidance⁶ (NPPG), which is available as a web-based resource.

4.5.2 Although paragraph 5 of the NPPF confirms that NSIPs are to be determined in accordance with the decision-making framework of the PA 2008 and relevant NPSs, decisions on NSIPs should also take account of any other matters that are "*relevant*", which may include the NPPF.

4.5.3 Section 2 'Achieving sustainable development' confirms (paragraph 7) that the purpose of the planning system is to contribute to the achievement of sustainable development, summarised as "*meeting the needs of the present without compromising the ability of future generations to meet their own needs*". Paragraph 8 goes on to identify three overarching objectives to the achievement of sustainable development, which are interdependent and need to be pursued in mutually supportive ways. These are:

- **an economic objective** – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;
- **a social objective** – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and
- **an environmental objective** – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

4.5.4 Central to the NPPF is 'a presumption in favour of sustainable development'. This is set out at paragraph 11. For decision-making, this means approving applications that accord with the development plan without delay.

4.5.5 The NPPF is supportive of infrastructure projects. One of the methods of fulfilling the objective of sustainable development listed at paragraph 8 under "*a) an economic objective*" is through the "*provision of infrastructure*".

4.5.6 Paragraph 152 in Section 14 'Meeting the challenge of climate change, flooding and coastal change' states that:

"The planning system should support the transition to a low carbon future in a changing climate ... it should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the

⁶ Ministry of Housing, Communities & Local Government (2021). Planning Practice Guidance.

reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure". [our underlining]

- 4.5.7 Paragraph 158 states that when determining applications for renewable and low carbon development, there should be no requirement for applicants to demonstrate the overall need for renewable or low carbon energy and that applications for renewable or low carbon development should be approved if their impacts are (or can be made) acceptable.
- 4.5.8 The NPPF policies of particular relevance to the Proposed Project include building a strong, competitive economy, promoting sustainable transport, achieving well-designed places, meeting the challenge of climate change, flooding and coastal change, conserving and enhancing the natural environment and conserving and enhancing the historic environment.
- 4.5.9 An assessment of how the Proposed Project addresses relevant NPPF policies is provided in **Table 4.3** below.

Table 4.3 – NPPF Policies

NPPF ref.	Summary	Assessment
Chapter 6 Building a strong, competitive economy	Confirms that the Government is committed to securing economic growth and productivity and allowing each area to build on its strengths, counter any weaknesses and address the challenges of the future. Paragraphs 81 and 82 make it clear that the planning system should do all it can to support sustainable economic growth though, amongst other measures, planning proactively and removing barriers to investment such as a lack of infrastructure.	The Proposed Project will contribute toward sustainable economic development increasing the efficiency and low carbon generating capacity of the consented Slough Multifuel Facility, for which there is a confirmed need, thereby contributing toward the security of electricity supplies. It will also generate some additional construction employment.
Chapter 9 Promoting sustainable transport	Aimed at facilitating more sustainable transport choices so as to contribute to wider sustainability and public health objectives. Paragraph 110 states that in assessing sites for applications it should be ensured that appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, safe and suitable access to the site can be achieved for all users and any significant impacts from the development on the transport network or on highway safety can be cost effectively mitigated to an acceptable degree.	<p>The fuel tonnage and residual ash associated with the Consented Development will not increase as a result of the Proposed Project, and therefore there will be no increase in vehicle movements to and from the Site.</p> <p>The Proposed Project will not result in any significant traffic or transportation effects during either construction, operation or decommissioning, as confirmed in Chapter 7 'Transport and Access' of the ES Volume I (Document Ref. 6.2.7).</p>

NPPF ref.	Summary	Assessment
	<p>Paragraph 113 states that all developments that generate significant amounts of movement should be required to provide a travel plan and should be supported by a transport statement or assessment and these should consider the opportunities to make use of sustainable transport modes.</p>	<p>The Section 106 Deed of Variation for the Consented Development (dated 17 November 2020) secures an operational Travel Plan for the Site. This obligation will also apply to the Proposed Project. The Travel Plan will be aimed at promoting sustainable transport choices. The Applicant intends to enter into a further Deed of Variation to ensure that the Section 106 obligations apply to the DCO.</p>
<p>Chapter 11 Making effective use of land</p>	<p>Aimed at promoting the effective use of land, including by (paragraph 120c) giving substantial weight to the use of suitable brownfield land.</p>	<p>The Proposed Project involves limited external physical (engineering) works at the Site comprising of the installation of an additional pipe 18m above ground level with a diameter of 273mm and a length of 20m.</p> <p>The Proposed Project therefore has no land use implications while the Consented Development already makes effective use of previously development industrial/employment land in accordance with Chapter 11 of the NPPF.</p>
<p>Chapter 12 Achieving well-designed places</p>	<p>Deals with the matter of design in the built environment. Paragraph 126 confirms that the Government attaches great importance to good design which is a key aspect of sustainable development. Paragraph 130 goes on to state that design quality should be considered throughout the evolution of individual proposals and applicants should work closely with those affected.</p>	<p>The additional external pipe to be installed as part of the Proposed Project will be viewed in the context of other pipework for the Consented Development, itself located in an existing and long-established industrial estate in a built-up urban area.</p> <p>The Proposed Project is almost hidden from all sides at ground level and will lead to a negligible change in the external appearance of the Consented Development.</p> <p>Information on the design and materials of the Proposed Project is included as part of the Application (see the Multifuel Facility Plans Document Ref. 4.4).</p>

NPPF ref.	Summary	Assessment
		It is therefore considered that the design of the Proposed Project is appropriate in terms of its context and industrial setting.
Chapter 14 Meeting the challenge of climate change, flooding and coastal change	<p>Focuses upon adapting to and mitigating the effects of climate change. Paragraph 152 highlights that planning plays a key role in helping shape places to secure radical reductions in greenhouse gas emissions, minimising vulnerability and providing resilience to the impacts of climate change, and supporting the delivery of renewable and low carbon energy.</p> <p>Paragraph 159 warns that inappropriate development in areas at risk of flooding should be avoided but where it is necessary the development should be made safe for its lifetime without increasing flood risk elsewhere. If it is not possible for development to be located in zones with a lower risk of flooding the exception test may have to be applied.</p>	<p>The Proposed Project will increase the efficiency and electrical capacity of the Slough Multifuel Facility, meaning that the plant will be capable of generating a greater amount of low carbon electricity, thereby contributing to climate change objectives.</p> <p>ES Volume I Chapter 11, 'Climate Change and Sustainability' (Document Ref. 6.2.11) provides an assessment of the potential effects of the construction and operation (including maintenance) of the Proposed Project in terms of climate change and sustainability. It concludes that consideration of the effects of the Proposed Project, together with other developments on GHG emissions, is considered to be <i>"...negligible or beneficial and therefore no cumulative effects are anticipated in respect of the Climate during the construction and operational phases"</i>.</p> <p>Chapter 12 'Other Issues' of ES Volume I (Document Ref. 6.2.12) confirms that as there will be no additional water discharge to that of the Consented Development, the Proposed Project will not result in any significant flood risk effects.</p>
Chapter 15 Conserving and enhancing the natural environment	Aimed at protecting and enhancing value landscapes, recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital, minimising impacts on and providing net gains for biodiversity and preventing new and existing development from contributing to, being put at	The accompanying ES demonstrates that the Proposed Project will not result in unacceptable impacts on the natural environment, in terms of matters such as climate and ecology, amongst others. Nor will it result in significant impacts in terms of air quality or noise and vibration, following the application of mitigation through the approved

NPPF ref.	Summary	Assessment
	unacceptable risk from or being adversely affected by unacceptable levels of soil, air, water or noise pollution or land instability.	CEMP for the Consented Development.
Chapter 16 Conserving and enhancing the historic environment	Seeks to conserve heritage assets so that they can be enjoyed for their contribution to the quality of life of existing and future generations. Paragraph 194 states that where a development proposal includes, or has potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.	Chapter 6 'EIA Methodology' of the ES Volume I (Document Ref. 6.2.6) explains that PINS agreed in its Scoping Opinion that cultural heritage could be scoped out of the ES. This was on the basis that the ES prepared for the Consented Development concluded that there were no significant residual effects in terms of cultural heritage and archaeology and that no specific mitigation measures were needed.

4.5.10 Table 4.3 demonstrates that there is no conflict between the Proposed Project and the key policies contained within the NPPF.

4.6 Statutory Development Plan Policy

4.6.1 The statutory development plan for the Proposed Project comprises the following development plan documents ('DPDs'):

- Slough Local Development Framework Core Strategy 2006-26 Development Plan Document (December 2008) – 'Slough Core Strategy 2008'.
- Slough Local Development Framework Site Allocations Development Plan Document (November 2010) – 'Slough Sites DPD'.
- Slough Local Plan (March 2004) Saved Policies (September 2007) – 'Waste Local Plan'.
- Waste Local Plan for Berkshire (December 1998) Saved Policies (September 2007) – 'Saved Waste Local Plan.'

4.6.2 The DPD policies of most relevance to the Proposed Project are set out and summarised in **Table 4.4** below along with how it complies with those policies. However, given that EN-1 and EN-3 provide the primary policy for the determination of this application, and include detailed assessment criteria and policies for energy NSIPs (which address many of the matters covered by the DPD policies), a summarised response has been made to each policy.

Table 4.4 – Statutory Development Plan Policies

Policy Document	Policy Title	Summary of Policy	Assessment
Local Development Framework - Core Strategy 2006 – 2026 Development Plan Document (December 2008)	Spatial vision	<p>Consolidating current efforts by the Council and its partners to improve the town’s environment; by 2026, Slough will have a positive image which will help to create prosperous, confident and cohesive communities. This will be achieved by the comprehensive redevelopment of parts of the town centre so that it can fulfil its role as a regional hub and maintain its position as an important regional shopping, employment and transport centre.</p> <p>There will also be the selective regeneration of other key areas, in a sustainable way, in order to meet the diverse needs and improve the prosperity and quality of life of Slough residents.</p> <p>The existing business areas in Slough will have an important role in maintaining a thriving local economy and providing a range of jobs for an increasingly skilled local workforce.</p> <p>All Slough residents will have the opportunity to live in decent homes that they can afford. The quality of the environment of the existing suburban residential areas and open spaces will be improved, in order to make them safe and attractive places where people will want to live and visit.</p>	<p>This policy makes clear that existing business areas in Slough are considered to have an important role in <i>“maintaining a thriving local economy and providing a range of jobs for an increasingly skilled local workforce”</i>. The Slough Trading Estate plays an important role in realising this objective by retaining and attracting businesses, creating jobs and improving skills and training to local people. The Consented Development is already making a positive contribution toward this objective already.</p>
Local Development Framework - Core Strategy 2006 – 2026 Development	Strategic Objectives	<p>a) To focus development in the most accessible locations such as the town centre, district and neighbourhood centres and public transport hubs and make the best use of existing</p>	<p>The Core Strategy includes Strategic Objective (I) to reduce the need to travel and create a transport system that encourages sustainable modes of transport such as walking, cycling and public transport.</p>

Policy Document	Policy Title	Summary of Policy	Assessment
Plan Document (December 2008)		<p>buildings, previously developed land and existing and proposed infrastructure.</p> <p>b) To meet the housing allocation for Slough identified in the South East Regional Plan, while also preventing the loss of existing housing accommodation to other uses.</p> <p>c) To provide housing in appropriate locations which meets the needs of the whole community; is of an appropriate mix, type, scale and density; is designed and built to high quality standards and is affordable.</p> <p>d) To ensure that the existing business areas continue to provide sufficient employment generating uses in order to maintain a sustainable, buoyant and diverse economy and ensure that Slough residents continue to have access to a wide range of job opportunities.</p> <p>e) To encourage investment and regeneration of employment areas and existing town, district and neighbourhood shopping centres to increase their viability, vitality, variety and distinctiveness.</p> <p>f) To maintain and provide for community services and facilities in appropriate locations that are easily accessible.</p> <p>g) To preserve and enhance Slough's open spaces and to protect the Green Belt from inappropriate development and seek, wherever</p>	<p>The Proposed Project does not itself constitute an EfW plant, but rather will increase the efficiency and electrical output of the consented Slough Multifuel Facility without increasing the throughput of waste, vehicle movements, or operating hours. The Proposed Project is in an appropriate location, being sited on an existing power generation site on the Slough Trading Estate.</p> <p>Regarding accessibility for employees and visitors; the location of the Site in Edinburgh Avenue within the Slough Trading Estate, is accessible to sustainable travel options i.e. public transport, cycling, walking and presently supported by a workplace travel plan.</p> <p>The Section 106 Deed of Variation for the Consented Development (dated 17 November 2020) includes an obligation for an operational Travel Plan for the Consented Development. The Applicant is prepared to enter into a further Deed of Variation to ensure that the Section 106 obligations apply to the DCO. The Proposed Project is therefore consistent with Strategic Objective I.</p> <p>As demonstrated by Chapter 14 'Summary of Environmental Effects' of the ES Volume I (Document Ref. 6.2.14), the Proposed Project will not result in any significant adverse environmental effects in terms of biodiversity, water, landscape and visual, pollution or flood risk, consistent with Strategic Objectives H and J.</p>

Policy Document	Policy Title	Summary of Policy	Assessment
		<p>practically possible, to increase the size and quality of the Green Belt land in the Borough.</p> <p>h) To protect, enhance and wherever practically possible increase the size of the Borough's biodiversity, natural habitats and water environment and those elements of the built environment with specific townscape, landscape and historic value.</p> <p>i) To reduce the need to travel and create a transport system that encourages sustainable modes of travel such as walking, cycling and public transport.</p> <p>j) To reduce areas subject to risk of flooding and pollution and control the location of development in order to protect people and their property from the effects of pollution and flooding.</p> <p>k) To promote a safe and healthy community that is inclusive of the needs of the Borough's diverse population.</p>	<p>Furthermore, the Proposed Project will not have any detrimental impact on the safety or health of the local community (consistent with Strategic Objective K).</p>
Local Development Framework - Core Strategy 2006 – 2026 Development Plan Document (December 2008)	Core Policy 1 Spatial Strategy	<p>All development will have to comply with the Spatial Strategy set out in this document.</p> <p>All development will take place within the built up area, predominantly on previously developed land, unless there are very special circumstances that would justify the use of Green Belt land. A strategic gap will be maintained between Slough and Greater London.</p> <p>Proposals for high density housing, intensive employment generating uses, such as B1(a) offices,</p>	<p>This policy requires all development to take place within the built up area, predominantly on previously developed land. There is also a requirement that the re-use of previously developed land can only happen after contamination from previous activities has been treated to an appropriate standard.</p> <p>The location of the Proposed Project has been dictated by the siting of the Consented</p>

Policy Document	Policy Title	Summary of Policy	Assessment
		<p>and intensive trip generating uses, such as major retail or leisure uses, will be located in the appropriate parts of Slough town centre. Such development will have to be comprehensively planned in order to deliver maximum social, environmental and economic benefits to the wider community.</p> <p>Proposals for the comprehensive regeneration of selected key locations within the Borough will also be encouraged at an appropriate scale. Some relaxation of the policies or standards in the Local Development Framework may be allowed where this can be justified by the overall environmental, social and economic benefits that will be provided to the wider community.</p> <p>Elsewhere the scale and density of development will be related to the site's current or proposed accessibility, character and surroundings. Significant intensification of use will not be allowed in locations that lack the necessary supporting infrastructure, facilities or services or where access by sustainable means of travel by public transport, cycling and walking are limited.</p>	<p>Development, itself positioned within the built up area of Slough Trading Estate and making use of previously developed land. Furthermore, the Proposed Project will not alter the scale or external appearance of the Consented Development. It is therefore considered that the Proposed Project accords with Core Policy 1.</p>
Local Development Framework - Core Strategy 2006 – 2026 Development Plan Document (December 2008)	Core Policy 5 Employment	<p>The location, scale and intensity of new employment development must reinforce the Spatial Strategy and transport strategy. This includes the application of a parking cap upon new developments unless additional parking is required for local road safety or operational reasons.</p> <p>Intensive employment-generating uses such as B1(a) offices will be located in the town centre in accordance with the spatial strategy.</p>	<p>The Core Strategy emphasises the significance of the Slough Trading Estate as the largest Existing Business Area, its success as an employment centre and its great importance to the local economy and the prosperity of Slough as a whole and that the success of the Trading Estate is important to the Borough's sustainable development, with the potential to retain and attract</p>

Policy Document	Policy Title	Summary of Policy	Assessment
		<p>B1(a) offices may also be located on the Slough Trading Estate, as an exception, in order to facilitate the comprehensive regeneration of the estate. This will be subject to the production of a Master Plan and the provision of a package of public transport improvements. This will be partly delivered through a subsequent Local Development Order which will replace the Simplified Planning Zone.</p> <p>Intensive employment generating uses which increase the level of in-commuting, increase skill shortages or reduce employment opportunities for local people will be expected to contribute toward appropriate mitigation measures, including new training, childcare and transport facilities.</p> <p>Major warehousing and distribution developments will be located in the eastern part of the Borough and in Existing Business Areas that have good access to the strategic road and rail network. There will be no loss of the defined Existing Business Areas to non-employment generating uses, especially where this would reduce the range of jobs available. Outside Existing Business Areas, the change of use or redevelopment of existing offices to residential will be encouraged where this is considered appropriate.</p>	<p>businesses, create jobs and opportunities for training (Core Strategy paragraphs 7.85/86).</p> <p>The Proposed Project will support the delivery and operation of the Consented Development, in turn supporting the continued prosperity of Slough Trading Estate by providing low carbon heat by way of CHP, which will offset grid gas or electricity from being used for heating. In doing so, it will support an Existing Business Area in the Borough in accordance with Core Policy 5.</p> <p>The Proposed Project itself will not require any increase in operational staff numbers but will generate an additional 20 construction jobs for a period of approximately two months.</p>
Local Development Framework - Core Strategy 2006 – 2026	Core Policy 7 Transport	All new development should reinforce the principles of the transport strategy as set out in the Council's Local Transport Plan and Spatial Strategy, which seek to ensure that new development is sustainable and is	The location of the Proposed Project is dictated by the siting of the Consented Development. The Proposed Project will not result in any adverse transport or access effects, following the application of mitigation, as reported in Chapter 7

Policy Document	Policy Title	Summary of Policy	Assessment
Development Plan Document (December 2008)		<p>located in the most accessible locations, thereby reducing the need to travel.</p> <p>Development proposals will, either individually or collectively, have to make appropriate provisions for:</p> <ul style="list-style-type: none"> • Reducing the need to travel; • Widening travel choices and making travel by sustainable means of transport more attractive than the private car; • Improving road safety; and • Improving air quality and reducing the impact of travel upon the environment, in particular climate change. <p>Development proposals will also have make contributions to, or provision for:</p> <ul style="list-style-type: none"> • The development of Slough town centre as a Regional Transport Hub; • The improvement of key transport corridors such as the links to Heathrow Airport; • Improvements to Slough, Burnham and Langley railway stations; and • The creation of a transport hub within Slough Trading Estate. <p>There will be no overall increase in the number of parking spaces permitted within commercial redevelopment schemes unless this is required for local road safety or operational reasons. Maximum</p>	<p>'Transport and Access' of the ES Volume I (Document Ref. 6.2.7).</p> <p>It will not result in an increase in operational staff numbers. The Section 106 Deed of Variation for the Consented Development (dated 17 November 2020) requires an operational Travel Plan for the Consented Development. The Applicant intends to enter into a further Deed of Variation to ensure that the Section 106 obligations apply to the DCO.</p>

Policy Document	Policy Title	Summary of Policy	Assessment
		restraint will be applied to parking for residential schemes in the town centre. In the rest of the Borough, the level of parking within residential development will be appropriate to both its location and the scale of the development and taking account of local parking conditions, the impact upon the street scene and the need to overcome road safety problems and protect the amenities of adjoining residents.	
Local Development Framework - Core Strategy 2006 – 2026 Development Plan Document (December 2008)	Core Policy 8 Sustainability and the Environment	<p>All development in the Borough shall be sustainable, of a high quality design, improve the quality of the environment and address the impact of climate change.</p> <p>1. Sustainable Design and Construction Principles:</p> <p>All development should, where feasible, include measures to:</p> <ul style="list-style-type: none"> a) Minimise the consumption and unnecessary use of energy, particularly from non-renewable sources; b) Recycle waste; c) Generate energy from renewable resources; d) Reduce water consumption; and e) Incorporate sustainable design and construction techniques, including the use of recycled and energy efficient building materials. <p>2. High Quality Design:</p> <p>All development will:</p>	<p>The extent of the external works proposed as part of the Proposed Project are limited to the installation of an additional pipe 18m above ground level with a diameter of 273mm and a length of 20m. Importantly this additional pipe will be viewed in the context of the Consented Development, itself located in an existing and long-established industrial estate in a built-up urban area. The Proposed Project will be almost hidden from all sides at ground level and will lead to a negligible change in external appearance of the Slough Multifuel Facility. It is therefore in keeping with and appropriate to its location and surroundings in accordance with Part 2(b) of Core Policy 8.</p> <p>The Proposed Project will not result in any additional water consumption or water discharge to that of the Consented Development. It is expected that as a result of the Proposed Project there will actually be a reduction in relation to the cooling load, as detailed in Chapter 12 'Other Issues' of ES Volume I (Document Ref. 6.2.12). The Proposed Project is therefore considered to accord with Part 1(d) of Core Policy 8.</p>

Policy Document	Policy Title	Summary of Policy	Assessment
		<p>a) Be of a high quality design that is practical, attractive, safe, accessible and adaptable;</p> <p>b) Respect its location and surroundings;</p> <p>c) Provide appropriate public space, amenity space and landscaping as an integral part of the design; and</p> <p>d) Be in accordance with the Spatial Strategy in terms of its height, scale, massing and architectural style.</p> <p>The design of all development within the existing residential areas should respect the amenities of adjoining occupiers and reflect the street scene and the local distinctiveness of the area.</p> <p>3. Pollution</p> <p>Development shall not:</p> <p>a) Give rise to unacceptable levels of pollution including air pollution, dust, odour, artificial lighting or noise;</p> <p>b) Cause contamination or a deterioration in land, soil or water quality; and</p> <p>c) Be located on polluted land, areas affected by air pollution or in noisy environments unless the development incorporates appropriate mitigation measures to limit the adverse effects on occupiers and other appropriate receptors.</p> <p>4. Flooding</p>	<p>The Proposed Project will not result in any significant adverse environmental affects following the application of appropriate mitigation, as reported in Chapter 14 'Summary of Environmental Effects' of ES Volume 1 (Document Ref. 6.2.14). It is therefore considered to accord with Part 3 of Core Policy 8.</p> <p>Chapter 12 'Other Issues' of the ES Volume I confirms that the Proposed Project will not result in any significant adverse effects in terms of flood risk, therefore according with Part 4 of Core Policy 8.</p>

Policy Document	Policy Title	Summary of Policy	Assessment
		<p>a) Development will only be permitted where it is safe and it can be demonstrated that there is minimal risk of flooding to the property and it will not impede the flow of floodwaters, increase the risk of flooding elsewhere or reduce the capacity of a floodplain; and</p> <p>b) Development must manage surface water arising from the site in a sustainable manner which will also reduce the risk of flooding and improve water quality.</p>	
Local Development Framework - Core Strategy 2006 – 2026 Development Plan Document (December 2008)	Core Policy 9 Natural and Built Environment	<p>Development will not be permitted unless it:</p> <ul style="list-style-type: none"> • Enhances and protects the historic environment; • Respects the character and distinctiveness of existing buildings, townscapes and landscapes and their local designations; • Protects and enhances the water environment and its margins; • Enhances and preserves natural habitats and the biodiversity of the Borough, including corridors between biodiversity rich features. 	<p>The Proposed Project will not adversely impact the historic environment or the surrounding landscape. PINS agreed for cultural heritage and landscape and visual to be scoped out of the ES. This is explained in further detail in Chapter 6 'EIA Methodology' of ES Volume I (Document Ref. 6.2.6).</p> <p>The ecological impact of the Proposed Project is considered within Chapter 10 'Ecology' of ES Volume I (Document Ref. 6.2.10). This concludes that the Proposed Project will not result in any significant effects on ecology during construction, operation, or decommissioning, following the application of mitigation.</p> <p>The Proposed Project is therefore considered to fully accord with Core Policy 9.</p>

Policy Document	Policy Title	Summary of Policy	Assessment
Local Development Framework - Core Strategy 2006 – 2026 Development Plan Document (December 2008)	Core Policy 10 Infrastructure	<p>Development will only be allowed where there is sufficient existing, planned or committed infrastructure. All new infrastructure must be sustainable.</p> <p>Where existing infrastructure is insufficient to serve the needs of new development, the developer will be required to supply all reasonable and necessary on-site and off-site infrastructure improvements. These improvements must be completed prior to the occupation of a new development and should serve both individual and communal needs.</p> <p>Infrastructure includes:</p> <ul style="list-style-type: none"> • Utilities (water, sewerage and drainage); • Transportation; • Education and skills; • Health; • Leisure, community and cultural services; and • Other relevant services. <p>The provision of reasonable and necessary infrastructure will be secured through planning obligations or by conditions attached to planning permissions.</p>	<p>The Proposed Project does not itself constitute an EfW plant, but rather will increase the efficiency and electrical output of the consented Slough Multifuel Facility without increasing the throughput of waste, vehicle movements, emissions or operating hours. The Applicant has already secured a connection to the electricity grid and further details are provided in the Grid Connection Statement (Document Ref. 5.5).</p> <p>Accordingly, there is no additional infrastructure required to deliver the Proposed Project, beyond that already forming part of the Consented Development. The Proposed Project is therefore considered to accord with Core Policy 10.</p>
Local Development Framework - Core Strategy 2006 – 2026 Development	Core Policy 12 Community Safety	<p>All new development should be laid out and designed to create safe and attractive environments in accordance with the recognised best practice for designing out crime. Activities which have the potential to create anti-social behaviour will be managed in</p>	<p>The works associated with the Proposed Project will be located predominately within the boiler house and turbine hall of the consented Slough Multifuel Facility. The only 'external' works will be a single pipe run between these two buildings, at a height of 18m above ground level.</p>

Policy Document	Policy Title	Summary of Policy	Assessment
Plan Document (December 2008)		order to reduce the risk of such behaviour and the impact upon the wider community.	Both buildings benefit from controlled access and are located within the perimeter of the Site, which is to be fenced and fully secured with closed circuit TV, gatehouse reception and manned continuously with constant site patrols. The Proposed Project is therefore considered to address the objectives of Core Policy 12.

4.7 Summary

- 4.7.1 This section of the Planning Statement has considered the Proposed Project's conformity against the assessment principles, generic impacts and assessment and technology specific considerations of the relevant energy NPSs (EN-1 and EN-3). The energy NPSs are the primary basis for the determination of energy NSIP applications. The Applicant's assessment has not identified any conflicts with relevant NPS policy.
- 4.7.2 While the current energy NPSs remain relevant policy, it is considered that the draft revised energy NPSs may be important and relevant to decision-making. The Proposed Project is also considered to accord with relevant policy within Draft NPS EN-1 and Draft NPS EN-3 (see **Appendix 3**).
- 4.7.3 Furthermore, the Planning Statement demonstrates that there is no conflict with NPPF policy or development plan policy.
- 4.7.4 While the NPPF and development plan policy may be important and relevant, the energy NPSs are the primary consideration for the determination of the Application and take precedence.

5.0 ASSESSMENT OF THE BENEFITS AND EFFECTS/IMPACTS OF THE PROPOSED PROJECT

5.1 Introduction

- 5.1.1 This section of the Planning Statement identifies the benefits of the Proposed Project, as well as any likely environmental effects/impacts that will result from it, having regard to the policy assessment within Section 4 and the EIA (Document Refs. 6.1 to 6.4) that has been undertaken for the Proposed Development.

5.2 Benefits of the Proposed Project

- 5.2.1 It is considered that the Proposed Project will have the following benefits:
- The Proposed Project will increase the efficiency and electrical output of the consented Slough Multifuel Facility. The electrical output will increase by an additional 10MW, representing a 20% increase in electrical output without a reduction in the 20MWth steam offtake to the Slough Trading Estate. It will therefore contribute further toward the urgent 'need' that exists for low carbon electricity generating capacity (as confirmed by NPS EN-1) and the security of UK electricity supplies.
 - The increased generation of low carbon electricity is also in accordance with the objectives of UK energy and climate change policy and will make a positive contribution toward the Government's target of net zero GHG emissions by 2050.
 - The Proposed Project will further contribute toward the effective use of the Site and land within the Slough Trading Estate by maximising the efficiency and electrical output of the consented Slough Multifuel Facility based on the same throughput of waste/fuel and no increased in the number of approved vehicle movements to and from the Site.
 - The construction of the Proposed Project will generate some additional employment during the construction phase, which will contribute further toward the local economy.

5.3 Likely Effects/Impacts of the Proposed Project

- 5.3.1 The EIA undertaken for the Proposed Project has not identified any likely significant adverse environmental effects/impacts during its construction, operation or decommissioning phases following the application of appropriate mitigation (secured through the existing CEMP for the Consented Development), or any significant change in effects as compared to those of the Consented Development.
- 5.3.2 A 'Summary of Environmental Effects' is set out at Table 14.1 at Chapter 14 of the ES Volume I (Document Ref. 6.2.14). Table 14.1 does not identify any significant adverse residual effects/impacts as a result of the Proposed Project.

5.4 Summary

- 5.4.1 As with all development proposals, it is necessary to assess the Proposed Project in terms of its conformity and compliance with relevant policy and weigh its benefits against any significant adverse effects/impacts – the "*planning balance*".
- 5.4.2 Section 4 of this Planning Statement has provided an assessment of the Proposed Project against the relevant policy within NPSs EN-1 and EN-3, in addition to other matters that may be important and relevant to the Secretary of State's decision-making, such as the NPPF and local development plan policy. That assessment has not identified any conflict between the Proposed Development and relevant policy within EN-1, EN-3, the NPPF or the local development plan. Notwithstanding the absence of any conflict with the NPPF or local development plan, it is important to recognise that the energy NPSs are the

- primary basis for the determination of applications for energy NSIPs and take precedence where there is any conflict with other policy.
- 5.4.3 Furthermore, based on the assessment at Appendix 3, the Proposed Project is considered to accord with relevant policy in Draft EN-1 and Draft EN-3.
- 5.4.4 The Proposed Project will have a number of clear benefits, not least, delivering an increased contribution toward the security of UK electricity supplies and climate change objectives. Furthermore, the EIA undertaken for the Proposed Project has not identified any likely significant adverse environmental effects/impacts during its construction, operation or decommissioning phases or any significant change in effects as compared to those of the Consented Development.
- 5.4.5 The Applicant intends to enter into a further Section 106 Deed of Variation to ensure that the Section 106 obligations that apply to the Consented Development, apply equally to the Proposed Project, should development consent be granted by the SoS.
- 5.4.6 In view of the above factors, development consent should be granted for the Proposed Project.

6.0 CONCLUSIONS

6.1.1 The following conclusions can be drawn from this Planning Statement:

- The Proposed Project involves the 'extension' of the Consented Development through carrying out certain physical works to increase the efficiency and gross installed capacity of the Slough Multifuel Facility from just under 50MW to circa 60MW. The physical works proposed are 'engineering operations' and therefore 'development' for the purposes of Section 31 of the PA 2008.
- The works associated with the Proposed Project will be located predominately within the boiler house and turbine hall of the Slough Multifuel Facility. The only 'external' works will be a single pipe run between these two buildings.
- The Proposed Project will not increase the throughput of waste, vehicle movements, emissions or operating hours at the Multifuel Facility, and will not alter the scale or external appearance of the consented buildings and structures.
- It is the extension which is the NSIP pursuant to Sections 14(1)(a) and 15(1) of the PA 2008, and the development forming part of the extension, which requires development consent pursuant to Section 31 of the PA 2008. The Consented Development is consented and constructed pursuant to the TCPA. It is not an NSIP, nor does it form part of one.
- There is an urgent 'need' for new low carbon electricity generating capacity in the UK. That need is confirmed in NPS EN-1 and by recent UK energy and climate change policy. That need is not open to debate or interpretation and should be afforded substantial weight in decision-making. Furthermore, the current energy NPSs are the primary basis for decision-making on energy NSIP applications.
- While the current energy NPSs remain relevant policy, it is considered that the draft revised energy NPSs may be important and relevant to the Secretary of State's decision-making in respect of the Proposed Project.
- The Proposed Project will increase the efficiency and electrical output of the consented Slough Multifuel Facility. The electrical output will increase by an additional 10MW, representing a 20% increase in electrical output without any change to the 20MWth heat offtake to the Slough Trading Estate. It will therefore contribute further toward the urgent need that exists for low carbon electricity generating capacity (as confirmed by NPS EN-1) and the security of UK electricity supplies.
- The increased generation of low carbon electricity is also in accordance with the objectives of UK energy and climate change policy and will make a positive contribution toward the Government's target of net zero GHG emissions by 2050.
- The Proposed Project will further contribute toward the effective use of the Site and land within the Slough Trading Estate by maximising the efficiency and electrical output of the consented Slough Multifuel Facility based on the same throughput of waste/fuel and no increase in the number of approved vehicle movements to and from the Site.
- The construction of the Proposed Project will generate some additional employment during the construction phase, which will contribute further toward the local economy.
- The EIA undertaken for the Proposed Project has not identified any likely significant adverse environmental effects/impacts during its construction, operation or decommissioning phases following the application of appropriate mitigation (secured through the existing CEMP for the Consented Development), or any significant change in effects as compared to those of the Consented Development.

- A 'Summary of Environmental Effects' is set out at Table 14.1 at Chapter 14 of the ES Volume I (Document Ref. 6.2.14). Table 14.1 does not identify any significant adverse residual effects/impacts as a result of the Proposed Project after mitigation.
 - Section 4 of this Planning Statement has provided an assessment of the Proposed Project against the relevant policy within NPSs EN-1 and EN-3, in addition to other matters that may be important and relevant to the Secretary of State's decision-making, such as the NPPF and local development plan policy. That assessment has not identified any conflict between the Proposed Project and relevant policy within EN-1, EN-3, the NPPF or the local development plan. Notwithstanding the absence of any conflict with the NPPF or local development plan, it is important to recognise that the energy NPSs are the primary basis for the determination of applications for energy NSIPs and take precedence where there is any conflict with other policy.
 - Furthermore, based on the assessment at Appendix 3, the Proposed Project is considered to accord with relevant policy in Draft EN-1 and Draft EN-3.
 - The Applicant intends to enter into a further Deed of Variation to ensure that the Section 106 obligations that apply to the Consented Development, also apply to the Proposed Project, should development consent be granted.
- 6.1.2 It is necessary to assess the Proposed Project in terms of its conformity and compliance with relevant policy and weigh its benefits against any significant adverse effects/impacts – the *"planning balance"*.
- 6.1.3 The Proposed Project will have a number of clear benefits, not least, delivering an increased contribution toward the security of UK electricity supplies and climate change objectives. Furthermore, the EIA undertaken for the Proposed Project has not identified any likely significant adverse environmental effects/impacts during its construction, operation or decommissioning phases, or any significant change in effects as compared to those of the Consented Development.
- 6.1.4 In view of the above factors, development consent should be granted for the Proposed Project.

APPENDIX 1: SITE AND CONSENTED DEVELOPMENT PLANNING PERMISSIONS

Item	Application	LPA Reference	Description	Status
Historic Site Planning Permissions				
1	Partial redevelopment of the SHP Site	P/00987/013	Demolition of two cooling towers and a 76 metre chimney stack, the erection of two coal/oil/gas fired boilers, one 30MW steam turbo generator, ancillary plant, enclosed coal store and 104 metre chimney stack.	Approved on 10 January 1989
2	Fibre Fuel Building	517871 (submitted to Berkshire CC)	Construction of a fibre fuel plant, ancillary offices, storage and service facilities on the Site of Buildings 6 and 24 Fairlie Road.	Approved by Berkshire County Council on 9 December 1997
3	HGV Delivery hours relaxation	P/00987/021 P/00987/022	Two separate applications for the relaxation of HGV Delivery hours for a temporary period.	Approved on 13 January 2006 and 30 August 2007
4	Package boiler and boiler house.	P/0098/023	Application for a gas fired package boiler and the construction of a single storey detached boiler house and associated 36 metre high flue subject to conditions.	Approved on 14 December 2010
Consented Development Planning Permissions				
5	Slough Multifuel Planning Permission	P/00987/024	Demolition of redundant plant and buildings and development of a multifuel combined heat and power (CHP) generating station of up to 50 megawatts including an enclosed tipping hall; fuel storage bunker and blending facility; boiler house	Approved, 2 June 2017

Item	Application	LPA Reference	Description	Status
			with combustion grate/s, boiler/s and auxiliary equipment; flue gas treatment (FGT) plant/s; turbine hall with condensing steam turbine; ash and residue handling facilities; erection of a new south chimney stack (up to 90 meters height) or extension of existing south chimney stack (up to 85 metres height); plant, associated development and alterations to site access.	
6	'Further Development' Planning permission	P/00987/025	Demolition of exiting fuel store and construction of a central site services building (containing staff facilities, stores / workshops and plant), installation of water treatment plant, provision of replacement car parking, and associated works along the eastern boundary of the Site.	Approved 2 June 2017
7	Non-Material Amendment (Parameter Plans)	P/00987/037	Non material amendment to planning application P/00987/024 dated 02/06/2017 (Approved Plans).	Approved 10 January 2020
8	Section 73 planning permission	P/00987/035	Variation to the wording of Condition 7 (Phase 3 Site Specific Remediation Strategy) & 9 (Controlled Waters Remediation Verification) of planning permission P/00987/024.	Approved 3 March 2020
9	Temporary planning permission (Pedestrian Bridge)	P/17998/000	Application for a temporary pedestrian bridge over Edinburgh	Approved 11 May 2020

Item	Application	LPA Reference	Description	Status
			Avenue for the construction period of the Slough Multifuel Project (42 Months).	
10	Non-material amendment (temporary working hours relaxation)	P/00987/050	Non material amendment to planning permission P/00987/035 (amendment to Condition 17 for temporary relaxation to noisy working hours).	Approved 22 July 2021
11	Section 73 planning permission	P/00987/051	Variation to the wording of Conditions 2 (Approved plans) & 3 (Requirements for Details) of planning permission P/00987/035.	Approved 1 February 2022
12	Slough Multifuel Western Site Infrastructure Permission	P/00987/052	Planning permission for APCr emergency access, bottom ash enclosure and weighbridge gatehouse.	Approved 4 May 2022
13	Further Development Parking NMA	P/00987/053	Non-material amendment to planning permission P/00987/025 to amend plans associated with Conditions 2, 3 and 6 to reflect a reduction to parking required at the Site.	Approved 22 June 2022
14	Greenock Road Planning Permission	P/19876/000	Planning permission for a revised section of site fencing which crosses over Greenock Road, an area under control of the applicant.	Approved 5 August 2022
15	Cooling Tower 8 Area Planning Application	P/00987/054	Planning application for the erection of an electrical house, acid tank, access and underground infrastructure associated with cooling tower 8.	Pending Determination

APPENDIX 2: OFFSITE PLANNING PERMISSIONS

Item	Application	LPA Reference	Description	Status
1	683/5 Stirling Road – Welfare Cabins	P/00931/007	Temporary removal of fencing and assembly of two welfare blocks (comprised of 31 triple-stacked portacabins) and associated works in connection with Slough Multifuel.	16 February 2021
2	690-5 Stirling Road Construction Laydown and Pre-assembly Area.	P/09085/001	Temporary use of land at 690 to 695 Stirling Road, Slough as a construction laydown and pre-assembly area in connection with the Slough Multifuel Project. The site would be used to store materials and for the pre-assembly of plant, It would also accommodate some staff welfare facilities and parking as required.	16 February 2021
3	Whitby Road Car Parking	P/03213/002	Temporary contractor car park measuring 0.5 ha on land at the Whitby Road area of the Slough Trading Estate, Slough, for a period of 42 months.	1 June 2021

APPENDIX 3: DRAFT NPS ASSESSMENT

Table A3.1 – Draft NPS EN-1: New / revised ‘assessment principles’

This table reports where Draft NPS EN-1 introduces proposed policy in terms of ‘assessment principles’ that is substantively different to that contained in the designated NPS EN-1.

Assessment principle	Summary	Assessment
Health (Draft EN-1, 4.3.5)	Opportunities should be taken to mitigate indirect impacts on health by promoting local improvements to encourage health and wellbeing including in respect of potential impacts on vulnerable groups within society.	<p>The Proposed Project will not result in any significant residual air quality or noise and vibration effects, as demonstrated by Chapter 8 ‘Air Quality’ and Chapter 9 ‘Noise and Vibration’ of the ES Volume I (Document Refs. 6.28 and 6.2.9) respectively.</p> <p>The Proposed Project does not introduce any new odour sources on site or change the intensity or nature of any predicted odour associated with the Consented Development.</p> <p>The management of dust and particulates and application of adequate mitigation measures will be enforced through the existing Consented Development CEMP (Document Ref: 6.4.4) as identified in Chapter 8 ‘Air Quality’ of the ES Volume I (Document Ref. 6.2.8).</p> <p>Furthermore, the Proposed Project will comply with all relevant health, safety, and environmental legislation.</p>
Environmental and Biodiversity Net Gain (Draft NPS EN-1, 4.5.1 – 4.5.4)	Proposals should seek opportunities to contribute to, and enhance, the natural environment by providing net gains for biodiversity where possible. In addition to delivering biodiversity net gain (BNG), developments may also deliver wider environmental gains relevant to the local area, and to national policy priorities.	The Environment Act 2021 provided the primary powers to introduce a mandatory Biodiversity Net Gain (‘BNG’) requirement for NSIPs. Defra launched a consultation on 10 th January 2022 regarding the details of BNG for NSIPs, which closed on 5 April 2022. It should be noted that this indicated that the BNG requirement for NSIPs will not take effect for at

Assessment principle	Summary	Assessment
	Applications for development consent should be accompanied by a statement demonstrating how opportunities for delivering wider environmental net gains have been considered, and, where appropriate, incorporated into the design of the proposed development.	<p>least two years, suggesting it will not come into force before November 2025 and therefore not apply to this application.</p> <p>The Proposed Project will not result in any residual adverse environmental effects, as detailed in Chapter 14 'Summary of Environmental Effects' of the Environmental Statement ('ES') Volume I (Document Ref. 6.2.14). In addition, the ecological impact of the Proposed Project is considered within Chapter 10 'Ecology' of the Environmental Statement ('ES') Volume I (Document Ref. 6.2.10), which concludes that it would not result in any significant ecological effects on ecology during construction, operation, or decommissioning, following the application of mitigation. Notwithstanding the fact that the BNG requirement does not apply to this application, the Proposed Project would not result any significant biodiversity effects.</p>
Climate Change Adaptation (Draft EN-1, 4.9.5)	In preparing measures to support climate change adaptation, applicants should consider whether nature-based solutions could provide a basis for such adaptation.	An assessment of the carbon dioxide emissions is provided in Chapter 11 'Climate' of the Environmental Statement ('ES') Volume I (Document Ref. 6.2.11). This concludes that the proposals will contribute to reducing GHG emissions relative to a comparable baseline consistent with a trajectory towards net zero by 2050.

Table A3.2 – Draft NPS EN-1: New / revised ‘generic impacts’

This table reports where Draft NPS EN-1 introduces proposed policy terms of ‘generic impacts’ that is substantively different to that contained in the designated NPS EN-1.

Generic impact	Summary	Assessment
Greenhouse gas emissions (Draft NPS EN-1, 5.3.1 – 5.3.10)	<p><u>Applicant’s Assessment</u> Proposals for energy infrastructure projects should include a carbon assessment as part of the ES. Applicants should look for opportunities to embed nature based or technological solutions to mitigate or offset the emissions of construction and decommissioning. Steps taken to minimise and offset emissions should be set out in a GHG Reduction Strategy.</p> <p><u>Decision Making</u> The SoS must be satisfied that the applicant has, as far as possible, assessed the GHG emissions of all stages of the development. The SoS should also give positive weight to projects that embed nature-based or technological processes to mitigate or offset the emissions of construction and decommissioning within the proposed development. In light of the vital role energy infrastructure plays in the process of economy wide decarbonisation, the SoS accepts that there are likely to be some residual emissions from construction and decommissioning of energy infrastructure. Government has determined that operational GHG</p>	<p>The Proposed Project will increase the capacity of the consented EfW facility, allowing more electricity to be generated without increasing significant environmental effects.</p> <p>An assessment of the carbon dioxide emissions is provided in Chapter 11 ‘Climate’ of the Environmental Statement (‘ES’) Volume I (Document Ref. 6.2.11). This concludes that the proposals will contribute to reducing GHG emissions relative to a comparable baseline consistent with a trajectory towards net zero by 2050.</p>

Generic impact	Summary	Assessment
	<p>emissions are not reasons to prohibit the consenting of energy projects and the SoS does not need to assess individual applications for planning consent against operational carbon emissions and their contribution to carbon budgets, net zero and the UK's international climate commitments.</p>	
<p>Biodiversity and geological conservation (Draft NPS EN-1, 5.4.4 – 5.4.5, 5.4.14, 5.4.16, 5.4.19, 5.4.21 – 5.4.22)</p>	<p><u>Applicant's Assessment</u> The design process should embed opportunities for nature inclusive design, taking into account wider ecosystem services and the benefits of natural capital. Applicants are encouraged to consider how their proposals can contribute towards BNG, in line with the 25 Year Environment Plan.</p> <p>Proposals should consider any opportunities to maximise the restoration, creation and enhancement of wider biodiversity. Applicants should consider producing and implementing a Biodiversity Management Strategy and, where appropriate, a Geodiversity Management Strategy</p> <p><u>Decision Making</u> The SoS should have regard to the aims and goals of the 25 Year Environment Plan and any relevant measures and targets. In doing so, the SoS should also take account</p>	<p>The Proposed Project will not result in any residual adverse environmental effects, as detailed in Chapter 14 'Summary of Environmental Effects' of the Environmental Statement ('ES') Volume 1 (Document Ref. 6.2.14). In addition, the ecological impact of the Proposed Project is considered within Chapter 10 'Ecology' of the Environmental Statement ('ES') Volume I (Document Ref. 6.2.10), which concludes that it would not result in any significant ecological effects on ecology during construction, operation, or decommissioning, following the application of mitigation.</p>

Generic impact	Summary	Assessment
	of the context of the challenge of climate change. The SoS may take account of any such net benefit in cases where it can be demonstrated.	
Historic environment (Draft NPS EN-1, 5.9.10, 5.9.15 – 5.9.16, 5.9.21, 5.9.26);	<p><u>Applicant's Assessment</u> Applicants should undertake an assessment of any likely significant heritage impacts. The applicant is encouraged, where opportunities exist, to prepare proposals which can make a positive contribution to the historic environment, and to consider how their scheme takes account of the significance of heritage assets affected. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably.</p> <p><u>Decision Making</u> The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining applications.</p>	The Proposed Project is not considered to present any adverse impacts on heritage assets and Cultural Heritage was in fact scoped out of the can be scoped out of the ES in agreement with PINS, as described in Chapter 6 EIA Methodology' of the Environmental Statement ('ES') Volume I (Document Ref. 6.2.6).
Landscape and visual (Draft NPS EN-1, 5.10.10);	<p><u>Applicant's Assessment</u> Applicants should consider how landscapes can be enhanced using landscape management plans.</p>	Chapter 6 EIA Methodology' of the Environmental Statement ('ES') Volume I (Document Ref. 6.2.6), explains why Landscape and Visual Amenity was scoped out of the ES. On the basis of the limited extent of external works associated with the Proposed Project, as well as its setting within an existing and long-established industrial estate in a

Generic impact	Summary	Assessment
		<p>built-up urban area, the Inspectorate agreed in the Scoping Opinion that this aspect can be scoped out of this ES.</p> <p>It was also acknowledged by the Inspectorate in the Scoping Opinion that the ES prepared for the Consented Development included mitigation effectively embedded as part of the design evolution with a view to minimising landscape and visual effects. That ES concluded that there were no significant landscape effects during construction or operation. The Proposed Project is almost hidden from all sides at ground level and will lead to a negligible change in appearance to the context of the Consented Development. On this basis it is considered that no assessment of Landscape and Visual Amenity is required in the EIA.</p> <p>The Scoping Opinion does state that that this ES should demonstrate that the <i>“increased operational hours would not result in visible plume effects beyond those assessed as part of the consented scheme which could be significant”</i>. As mentioned above, there is no proposed change to operational hours and the Proposed Project should reduce the frequency and extent of the visible plume and is not expected to increase it.</p>
Land use, including open space, Green Infrastructure, and Green Belt (Draft NPS EN-1, 5.11.8);	<p><u>Applicant's Assessment</u> Applicants are encouraged to develop and implement a Soil Management Plan.</p>	<p>The Proposed Project involves limited external engineering works comprising of the installation of an additional pipe 18m above ground level with a diameter of 273mm and a length of 20m.</p> <p>Accordingly, no Soil Management Plan should be required given the lack of any below ground interventions required for these engineering works.</p>
Noise (Draft NPS EN-1, 5.12.9);	<p><u>Decision Making</u> Development must be undertaken in accordance with statutory requirements for</p>	<p>Chapter 9 'Noise and Vibration' of the Environmental Statement ('ES') Volume I (Document Ref. 6.2.9) considers the noise and vibration impact of the Proposed Project, and makes specific reference to the</p>

Generic impact	Summary	Assessment
	noise. Due regard must be given to the relevant sections of the Noise Policy Statement for England (NPSE), the National Planning Policy Framework (NPPF), and the Government's associated planning guidance on noise.	Noise Policy Statement for England. This concludes that the Proposed Project will not result in any significant noise or vibration effects, during either the construction, operation or decommissioning phase.
Socio-economic impacts (Draft NPS EN-1, 5.13.9);	<u>Decision Making</u> The SoS may wish to include a requirement that specifies the approval by the local authority of an employment and skills plan.	Whilst there will be some minimal changes to employment through the additional 20 staff for two months during construction, there are no changes to operational staff numbers (over those proposed for the Consented Development). Accordingly, it is considered that the imposition of an employment and skills plan for engineering works of this scale would be disproportionate.
Traffic and transport (Draft NPS EN-1, 5.4.18);	<u>Decision Making</u> The SoS should only consider preventing or refusing development on highways grounds if there would be an unacceptable impact on highway safety, or residual cumulative impacts on the road network would be severe.	The Proposed Project would not result in any significant effects during either construction, operation or decommissioning, as confirmed by Chapter 7 'Transport and Access' of the Environmental Statement ('ES') Volume I (Document Ref. 6.2.7).
Resource and waste management (Draft NPS EN-1, 5.15.7 – 5.15.8);	<u>Applicant's Assessment</u> Where possible, applicants are encouraged to source materials from recycled or reused sources and use low carbon materials, sustainable sources and local suppliers. Construction best practices should be used to ensure that material is reused or recycled onsite where possible. Applicants are encouraged to use construction best practices in relation to storing materials in an adequate and	The existing approved CEMP (Document Ref. 6.4.4) for the Consented Development includes provision for the secure storage of materials and the sourcing of recycled or reused sources and use low carbon materials. The existing CEMP will apply to the Proposed Project.

Generic impact	Summary	Assessment
	protected place on site to prevent waste, for example, from damage or vandalism.	
Water quality and resources (Draft NPS EN-1, 5.16.3 – 5.16.4)	<p><u>Applicant's Assessment</u></p> <p>Where possible, applicants are encouraged to manage surface water during construction by treating surface water runoff from exposed topsoil prior to discharging and to limit the discharge of suspended solids.</p> <p>Applicants are encouraged to consider protective measures to control the risk of pollution to groundwater beyond those outlined in Water Resources Management Plans - this could include, for example, the use of protective barriers.</p>	<p>Chapter 12 'Other Issues' of the Environmental Statement ('ES') Volume I (Document Ref. 6.2.12), considers flood risk and states that since there will be no additional water discharge to that of the Consented Development as a result of the Proposed Project. Accordingly, it concludes that the Proposed Project will not result in any significant flood risk effects.</p> <p>Additionally, the Proposed Project will not result in any additional water consumption or water discharge to that of the Consented Development. It is expected that as a result of the Proposed Project there will actually be a reduction in relation to the cooling load. The Proposed Project will therefore not result in any impacts in terms of water quality, in addition to those arising from the Consented Development.</p>

Table A3.3 – Draft NPS EN-3: Technology Specific Considerations

This table reports where Draft NPS EN-3 introduces proposed policy that is substantively different to the designated NPS EN-3.

Topic	Summary	Assessment
National Designations (Draft NPS EN-3, 2.5.33 – 2.5.34)	<p>In sites with nationally recognised designations (Sites of Special Scientific Interest, National Nature Reserves, National Parks, the Broads, Areas of Outstanding Natural Beauty and Registered Parks and Gardens), the SoS must only grant consent for renewable energy projects where it can be demonstrated by the Applicant that the objectives of designation of the area will not be compromised and any significant adverse effects on the qualities for which the area has been designated are clearly outweighed by the environmental, social and economic benefits of the proposed development.</p> <p>In considering the impact on the historic environment, the SoS should take into account the positive role that largescale renewable projects play in the mitigation of climate change, the delivery of energy security and the urgency of meeting the national targets for renewable energy supply and emissions reductions.</p>	The Proposed Project is not located within any of the National Designations listed, but rather within an existing estate.
Waste treatment Capacity (Draft EN-3, 2.10.4 – 2.10.5)	<p>Applicants must demonstrate that proposed EfW plants are in line with the Department for Environment, Food & Rural Affairs' (Defra) policy position on the role of EfW in treating municipal waste.</p> <p>The proposed plant must not result in over-capacity of EfW treatment at a national or local level.</p>	<p>The Proposed Project comprises physical works which would facilitate an increase the efficiency and gross installed capacity of the consented generating station from just under 50MW to 60MW. Importantly, the Proposed Project does not itself constitute an EfW plant, but rather would generate additional power at the consented Slough Multifuel Facility without increasing the throughput of waste, vehicle movements, emissions or operating hours.</p> <p>The Proposed Development would not, therefore, result in the over-capacity of EfW at either a national or local</p>

Topic	Summary	Assessment
		level, but would rather make more efficient use of an already consented and partially constructed EfW facility.