



BY EMAIL ONLY to: [REDACTED]@stateraenergy.co.uk

William Summerlin  
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80 Victoria Street  
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1 August 2024

Dear Mr Summerlin,

**THE THURROCK FLEXIBLE GENERATION PLANT DEVELOPMENT CONSENT ORDER  
2022 – S.I. 2022/157 (“the 2022 Order”) – Proposed Non-Material Change Application**

**Regulation 7(3) of the Infrastructure Planning (Changes to, and Revocation of,  
Development Consent Orders) Regulations 2011 (“the 2011 Regulations”)**

1. Thank you for your application of 9 February 2024 on behalf of Thurrock Flexible Generation Limited (“the Applicant”), which sets out proposals for changes to the 2022 Order which are said to be non-material. Specifically, the Applicant seeks to amend the 2022 Order to provide that the generating station may include “up to 100” gas reciprocating engines.
2. After considering the information provided, there are matters on which the Secretary of State for Energy Security & Net Zero (“the Secretary of State”) would be grateful if the Applicant could provide further information as appropriate.

Air Quality

3. The Secretary of State notes that the gross rated output of 620MW remains unchanged by the proposed non-material change and that emissions will be controlled by the environmental permit.
4. The Secretary of State notes that the number of gas engines was not determined when the Environmental Statement (“ES”) was prepared and submitted, and the Applicant used various ‘Maximum Design Scenarios’ when assessing operational emissions, which the Applicant considered represented various worst-case scenarios.
5. Table 2.18 of the ES<sup>1</sup> and paragraph 1.1.1 of ES Appendix 12.5<sup>2</sup> define these scenarios. This includes Scenario 1: 48 x 12.4 MW engines, each engine with its own stack (48 stacks), as a *‘reasonable maximum potential air pollutant impact from larger number of smaller gas*

<sup>1</sup> [https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010092/EN010092-000757-A6\\_Vol3\\_Chapter\\_12\\_Air\\_Quality.pdf](https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010092/EN010092-000757-A6_Vol3_Chapter_12_Air_Quality.pdf) (Page 25)

<sup>2</sup> [https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010092/EN010092-000804-A6\\_Vol6\\_Appendix\\_12.5\\_Results\\_of\\_Other\\_Scenarios.pdf](https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010092/EN010092-000804-A6_Vol6_Appendix_12.5_Results_of_Other_Scenarios.pdf)

engines.'. Scenario 3 was 33 x 18.4 MW engines with 33 stacks, as a '*reasonable maximum potential air pollutant impact from smaller number of larger gas engines.*'. The Secretary of State notes that there was no design scenario for 100 engines.

6. In the ES, Scenario 1 was adopted, as the predicted concentrations for this scenario were highest (ES para 4.2.1). Long-term predicted NO<sub>2</sub> concentrations for other engine scenarios are presented in ES Appendix 12.5. The Secretary of State notes that the increase in long-term predicted concentrations of NO<sub>2</sub> in Scenario 1 (Table 4.6 of the ES) versus Scenario 3 (Table 1.6 of ES Appendix 12.5) at all receptors are minor, with increases of Predicted Environmental Concentrations as % of Air Quality Assessment Limits less than 2%.
7. This information suggests there is a difference in predicted concentrations dependent upon the number of engines used to generate the same electrical output. Whilst the differences between 33 and 48 engines appears minor, it is not clear to the Secretary of State whether there is a greater magnitude in increase in predicted concentrations between 48 engines with 48 stacks and 100 engines with 48 stacks; the new worst-case scenario.
8. Therefore, the Applicant is requested to provide clarification and further supporting information to assist the Secretary of State in confirming whether 100 engines with 48 stacks is a reasonable worst-case scenario and whether there are new or materially different likely significant effects resulting from the change.

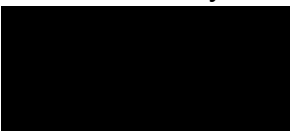
#### Traffic Movements

9. The Secretary of State acknowledges that transporting a larger number of smaller engines could lead to differing impacts on traffic and related emissions. The Applicant is requested to provide details of the impact of this proposed non-material change on traffic movements, including abnormal invisible loads that may need to be routed through Tilbury2 which adjoins the site.

#### Regulation 7A

10. The Secretary of State recognises that whilst the Applicant provided a copy of the Regulation 6 Notice in their application statement, a copy of the relevant newspaper excerpts has not yet been received. The Applicant is requested to provide this to show that it has complied with the requirements of Regulation 6, as required by Regulation 7A of the 2011 Regulations.
11. In publishing this letter, the Secretary of State acknowledges the public consultation that went live on 14 February 2024 in line with the requirements in Regulation 6 of the 2011 Regulations, and which closed on 22 March 2024.
12. Finally, the Secretary of State's reasoning in this matter should not be taken as indicating approval for any aspects of the proposed changes to the 2022 Order which fall to him for consideration and determination, or whether the proposed changes will ultimately be regarded as material or not.

Yours sincerely,



John Wheadon  
Head of Energy Infrastructure Planning Delivery  
On behalf of the Secretary of State for Energy Security and Net Zero