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# **SCOPING OPINION:**

## **Proposed Slough Multifuel Project**

**Case Reference: EN010129**

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Adopted by the Planning Inspectorate (on behalf of the Secretary of State) pursuant to Regulation 10 of The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017

**December 2021**



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# 1. INTRODUCTION

- 1.1.1 On 17 November 2021, the Planning Inspectorate (the Inspectorate) received an application for a Scoping Opinion from SSE Slough Multifuel Limited (the Applicant) under Regulation 10 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) for the proposed Slough Multifuel Project (the Proposed Development). The Applicant notified the Secretary of State (SoS) under Regulation 8(1)(b) of those regulations that they propose to provide an Environmental Statement (ES) in respect of the Proposed Development and by virtue of Regulation 6(2)(a), the Proposed Development is 'EIA development'.
- 1.1.2 The Applicant provided the necessary information to inform a request under EIA Regulation 10(3) in the form of a Scoping Report, available from:  
  
<http://infrastructure.planninginspectorate.gov.uk/document/EN010129-000009>
- 1.1.3 This document is the Scoping Opinion (the Opinion) adopted by the Inspectorate on behalf of the SoS. This Opinion is made on the basis of the information provided in the Scoping Report, reflecting the Proposed Development as currently described by the Applicant. This Opinion should be read in conjunction with the Applicant's Scoping Report.
- 1.1.4 The Inspectorate has set out in the following sections of this Opinion where it has / has not agreed to scope out certain aspects / matters on the basis of the information provided at as part of the Scoping Report. The Inspectorate is content that the receipt of this Scoping Opinion should not prevent the Applicant from subsequently agreeing with the relevant consultation bodies to scope such aspects / matters out of the ES, where further evidence has been provided to justify this approach. However, in order to demonstrate that the aspects / matters have been appropriately addressed, the ES should explain the reasoning for scoping them out and justify the approach taken.
- 1.1.5 Before adopting this Opinion, the Inspectorate has consulted the 'consultation bodies' listed in Appendix 1 in accordance with EIA Regulation 10(6). A list of those consultation bodies who replied within the statutory timeframe (along with copies of their comments) is provided in Appendix 2. These comments have been taken into account in the preparation of this Opinion.
- 1.1.6 The Inspectorate has published a series of advice notes on the National Infrastructure Planning website, including [Advice Note 7: Environmental Impact Assessment: Preliminary Environmental Information, Screening and Scoping \(AN7\)](#). AN7 and its annexes provide guidance on EIA processes during the pre-application stages and advice to support applicants in the preparation of their Environmental Statement (ES).
- 1.1.7 Applicants should have particular regard to the standing advice in AN7, alongside other advice notes on the Planning Act 2008 (PA2008) process, available from:

<https://infrastructure.planninginspectorate.gov.uk/legislation-and-advice/advice-notes/>

- 1.1.8 This Opinion has been prepared on the basis that the Proposed Development relates to an extension to the gross electricity generation output of the consented Slough Multifuel Facility (the 'consented scheme') from 50MWe to 60MWe as set out in section 3.3 of the Scoping Report. References to the Proposed Development in this Opinion relate to that extension. Section 6.2 of the Scoping Report explains the construction of the consented scheme commenced in May 2021 and is scheduled for completion in 2024.
- 1.1.9 Section 6.2 of the Scoping Report sets out the Applicant's proposed ES assessment scenarios for the Proposed Development. In particular, the Applicant states that the "*present-day baseline...scenario adds no value to the process, as the changes associated with the Proposed Development will be assessed against the consented scheme being built and in situ*".
- 1.1.10 The Opinion has been adopted on the basis of the Proposed Development as described. The ES should consider the full extent of any provisions in the draft Development Consent Order (DCO) that have the potential to result in significant effects on the environment beyond those considered as part the consented scheme, and for which the detail may not have been forthcoming as part of the Scoping Report. For example, any powers sought in the DCO to vary the construction or operation of the facility, such as modification or disapplication of planning conditions attached to the existing consented scheme.
- 1.1.11 This Opinion should not be construed as implying that the Inspectorate agrees with the information or comments provided by the Applicant in their request for an opinion from the Inspectorate. In particular, comments from the Inspectorate in this Opinion are without prejudice to any later decisions taken (e.g. on formal submission of the application) that any development identified by the Applicant is necessarily to be treated as part of a Nationally Significant Infrastructure Project (NSIP) or Associated Development or development that does not require development consent.

## 2. OVERARCHING COMMENTS

### 2.1 Description of the Proposed Development

(Scoping Report Chapter 3)

ID	Ref	Description	Inspectorate's comments
2.1.1	Paragraphs 2.3.2 and 3.5.5	The consented scheme	<p>Cooling Tower 8 should be considered in the definition of any future baseline for the Proposed Development. Reference is made to the "<i>refurbished Cooling Tower 8</i>" becoming dedicated to the Proposed Development, but it is unclear what would happen in the absence of the Proposed Development i.e. implementation of the consented scheme. Paragraph 3.5.5 implies that the difference would be the cooling tower being "<i>solely connected to and utilised by the Proposed Development rather than operated as shared infrastructure</i>".</p> <p>The ES should clearly explain what (if any) physical works are needed for Cooling Tower 8 in connection with those listed in paragraph 3.3.1 of the Scoping Report and / or confirm how Cooling Tower 8 would be operated in a future baseline scenario in the absence of the Proposed Development (i.e. consented scheme only).</p> <p>Furthermore, the ES should consider the potential for any significant effects (direct and indirect) arising from the removal of Cooling Tower 8 and its associated infrastructure as a shared facility.</p>
2.1.2	Paragraph 2.3.4 and Section 3.5	The consented scheme compared to the Proposed Development	<p>The consented scheme is stated as having a design capacity of up to 400,000 tonnes per annum of Waste Derived Fuel (WDF), with a maximum of 480,000 tonnes and on the assumption of 8,000 hours of operation per year.</p> <p>The "<i>consented scheme plus the Proposed Development</i>" is anticipated to be operational for up to 8,760 hours per year (an increase from the 8,000 hours assumed for the consented scheme).</p>

ID	Ref	Description	Inspectorate's comments
			<p>The description of the Development in the ES should explain the basis for the nearly 10% increase in operational hours assumed for the Proposed Development. Relevant aspect chapters (such as air quality and noise) should address the implications of this increase in hours of operation. This should include any potential changes in the duration or frequency of occurrence of visible plumes and any consequent effects for aviation safety or landscape and visual effects, where relevant.</p>

## 2.3 EIA Methodology and Scope of Assessment

(Scoping Report Chapter 6)

ID	Ref	Description	Inspectorate's comments
2.3.1	Paragraphs 3.4.1, 6.2.2 and 6.2.4	Construction phase	<p>Paragraph 6.2.4 states that construction phase effects “<i>will be taken to be those for which the source begins and ends during the construction stage of the Proposed Development</i>” and that “<i>some aspects of construction related effects will last for longer than others</i>”.</p> <p>For clarity, the Inspectorate understands that the construction of the engineering works that comprise the Proposed Development (and to which the DCO will relate) will have an approximate two month duration. These works are anticipated to occur in Q1 2024 and intended to be completed before the Multifuel facility enters the operation phase. The Inspectorate therefore understands that the ES will assess the effects of these activities only, reporting on effects that are worse than, additional to or different from those relating to the consented scheme over that two month period. The Inspectorate also notes that the Proposed Development is not proposed to change the programme for the consented scheme.</p> <p>The aspect chapters of the ES should be clear on the extent to which the extension construction activity has the potential to result in significant environmental effects that are additional to, or different from those assessed and considered as part of the consented scheme. This should also reflect the confidence in any assumptions / limitations / preclusions made in the assessment (i.e. the Proposed Development works cannot start until a certain phase of the construction of the consented scheme has started or has been completed).</p> <p>Furthermore, the anticipated scale of the remaining construction works following the construction of the Proposed Development should</p>

ID	Ref	Description	Inspectorate's comments
			be set out in the ES, so that the position is clear at the time that the DCO application is submitted.
2.3.2	Paragraph 6.2.3	Requirement for up to date baseline data	The Inspectorate notes that the Applicant proposes to use baseline data gathered for the consented scheme to inform the baseline for the Proposed Development. The Applicant should ensure that any data relied upon for the assessment is sufficiently up to date so that it characterises the existing environment at the time that the assessment is undertaken.
2.3.3	Paragraphs 6.4.1 to 6.4.3 and 6.5.9	Mitigation	<p>The Scoping Report states that embedded mitigation measures will be incorporated into the design which will be included in the assessment of effects (paragraphs 6.4.1 to 6.4.3). Additional mitigation will be used to eliminate, mitigate, or reduce adverse impacts to determine 'residual' effects (paragraph 6.5.9).</p> <p>The description of mitigation measures should be clear between those that are already implemented as part of the consented scheme and those that are additional / supplement such measures or control plans (e.g., Construction Environmental Management Plans (CEMPs) etc). In these instances, it should be clear how those measures are to be secured as part of the DCO in understanding their relationship to existing provisions attached to the consented scheme.</p> <p>The most recent version of the CEMP implemented for the consented scheme should be provided within the ES. The Inspectorate expects clarity regarding any new or different measures required in relation to the extension.</p>
2.3.4	N/A	Provision of the ES conclusions of the consented scheme	The ES for the Proposed Development should provide commentary regarding the conclusions of likely significant effects and mitigation for the consented scheme to ensure that any effects and consequent mitigation arising from the extension have been addressed consistently. Justification should be provided as to whether the



ID	Ref	Description	Inspectorate's comments
			<p>original conclusions remain valid or an explanation of how the original conclusion has changed.</p> <p>It is recommended that the original ES, any addendums and the original consent for the consented development are appended to the application. The Inspectorate notes that the provision of this information does not provide a mechanism to revisit the original consenting decision.</p>
2.3.5	N/A	Environmental permits	<p>The Scoping Report refers to environmental permits. The ES should cross reference information provided within the other DCO application documents regarding the content and progress of all required permit applications.</p>
2.3.6	N/A	Transboundary	<p>The Scoping Report makes no reference to transboundary effects on the environment of any European Economic Area (EEA) state.</p> <p>Given the nature, scale and location of the Proposed Development, the Inspectorate does not consider that it has the potential for significant transboundary effects on the environment of any EEA state.</p>

### 3. ENVIRONMENTAL ASPECT COMMENTS

#### 3.1 Transport and Access

(Scoping Report Chapter 7)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.1.1	Paragraph 7.5.5	Operational effects	<p>The Applicant proposes to scope out operational transport effects on the basis that the Proposed Development will not lead to any additional trips once construction is complete. The Scoping Report states that <i>"any trips on the transport network will be associated with the operation of the consented scheme rather than the Proposed Development"</i>. Paragraph 3.3.2 of the Scoping Report also states that <i>"The increase in efficiency and generating capacity will not require any increase in the hourly throughput of WDF or in the number of approved deliveries to the facility"</i>.</p> <p>On the basis that the number of approved deliveries is not anticipated to change, the Inspectorate considers that further assessment of operational traffic movements is not required, however the ES should confirm the total traffic movements and how these are to be secured in the DCO, with reference to the consented scheme.</p>

ID	Ref	Description	Inspectorate's comments
3.1.2	Paragraph 7.4.1	Construction staff	<p>It is stated that there are <i>"anticipated to be 20 staff onsite during construction"</i> but Chapter 3 (paragraph 3.4.2) implies that there will be an <i>increase</i> of 20 people during construction. The ES should clarify how many staff will be working on the site in connection with the consented scheme during the concurrent construction of the Proposed Development and how the total number of staff onsite during the two</p>

ID	Ref	Description	Inspectorate's comments
			month construction period has been assessed as part of the transport and access chapter.
3.1.3	Paragraph 7.5.11	Local Highway Network	The roads identified in the Scoping Report are those within the immediate vicinity of the site, which was assessed in the ES for the consented scheme. The Inspectorate considers that the ES should provide commentary on the likely impact of the proposed development on the Strategic Road Network (SRN). The need for any further assessment on the SRN should be agreed with National Highways, where possible.

## 3.2 Air Quality

(Scoping Report Chapter 8)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.2.1	Paragraph 8.2.4	Two Local Nature Reserves (LNRs) and three non-statutory sites as ecological receptors	<p>The two LNR sites (Haymill Valley and Cocksherd Wood) and three non-statutory sites (Haymill Valley, Cocksherd Wood and Boundary Copse Woodland Trust Reserve) are proposed to be scoped out as ecological receptors given that these sites would be infrequently downwind of the Proposed Development and so would experience negligible effects.</p> <p>On this basis, the Inspectorate agrees that significant effects are unlikely to occur and agrees that this matter can be scoped out of the ES.</p>
3.2.2	Paragraph 8.5.2	Construction phase traffic emissions on local air quality	<p>The Applicant proposes to scope out further assessment on the construction phase traffic emissions on local air quality on the basis that traffic during the construction phase will be negligibly higher than that of the consented scheme for the two-month construction period.</p> <p>Considering the scale of the proposed traffic (one additional two-way HGV movements per day) it is unlikely that significant effects on air quality will occur. The Inspectorate agrees that this can be scoped out of the ES.</p>
3.2.3	Paragraphs 8.5.5 and 8.5.6	Human Health Risk Assessment (HHRA)	<p>The Applicant proposes that an updated HHRA will not be included within the EIA for the Proposed Development. The Scoping Report observes that since undertaking the Air Quality assessment for the consented scheme, the European Commission updated the Best Available Technique documents relating to waste incineration (published in 2019) that introduce new standards which will lower</p>

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			<p>emissions. For this reason, the Scoping Report states that the HHRA undertaken for the consented scheme remains valid.</p> <p>However, considering the Proposed Development involves the use of new technology and there are a number of sensitive human receptors within the vicinity of the scheme, the Inspectorate does not agree to scope this matter out at this stage. The ES should clarify whether the changes to the consented scheme resulting from the Proposed Development will alter the characteristics of the effects or present different risks to human health.</p>
3.2.4	Paragraph 8.6.3	Demolition and earthworks stages of the construction phase	<p>The Applicant proposes to scope out demolition works and earthworks since these have already been completed on site as part of the construction of the consented scheme. The Inspectorate agrees that this matter can be scoped out on this basis.</p>
3.2.5	Paragraph 8.5.7	Odour assessment	<p>The Scoping Report suggests that odour concentrations from the Proposed Development during the operational phase would not be significant as they would be controlled through "<i>similar good practice measures</i>" to that of the consented scheme. The Applicant should provide a description of the proposed measures to reduce effects from odour, as well as clearly highlighting any measures required for the Proposed Development that would be additional to those associated with the consented scheme.</p> <p>In the absence of such information to demonstrate that significant effects are not likely to occur, the Inspectorate is of the opinion that this matter cannot be scoped out at this stage.</p>

ID	Ref	Description	Inspectorate's comments
3.2.6	Paragraphs 8.2.3 and 8.2.4	Air Quality Management Areas (AQMAS)	<p>The Scoping Report states that five AQMAS are covered by Slough Borough Council, all of which are designated for exceedances of nitrogen dioxide. The Three Tuns AQMA is the only AQMA included as a sensitive receptor within the assessment as it is the closest, located 1.4km southeast of the site. The Scoping Report provides no detail regarding the location of the other AQMAS and their distance from the site.</p> <p>The ES should clearly explain the air quality study area and the inclusion / exclusion criteria for all relative sensitive receptors such as AQMAS.</p>
3.2.7	Paragraphs 8.2.4 and 8.2.5	Ecological Receptors	<p>The Scoping Report identifies ecological receptors within 10km of the Proposed Development. However, DEFRA and Environment Agency guidance for environmental permitting (referred to in paragraph 8.6.4 of the Scoping Report) suggests that projects exceeding 50 megawatts should apply a larger search radius of 15km for the screening of sensitive ecological sites. The ES should screen the need for further assessment of ecological receptors within this wider zone. Additionally, the air quality aspect in the ES should also consider that the Proposed Development is located within the Impact Risk Zones (IRZs) for Burnham Beeches SAC, Windsor Forest and Great Park, SAC and South West London Waterbodies SPA.</p>
3.2.8	Paragraph 8.5.1	Impacts of dust at receptors	<p>Paragraph 8.5.1 of the Scoping Report suggests that the effect of dust on sensitive receptors within 200m of the site will be assessed. However, paragraph 8.6.2 of the Scoping Report refers to a 350m threshold set out in Institute of Air Quality Management Guidance (2014). The Inspectorate considers that the potential for likely significant dust effects should be assessed using the wider 350m study area. The ES should report study areas consistently.</p>

ID	Ref	Description	Inspectorate's comments
3.2.9	Paragraphs 8.5.4, 8.5.4 and 8.6.4 to 8.6.7	Hours of operation	The air quality assessment chapter makes no specific reference to the increase in operational hours assumed as set out in section 3.5 of the Scoping Report. As per the comments at ID 2.1.2, the air quality assessment should set out the significance of effects during operation of the facility for 8,760 hours per year (an increase from the 8,000 hours assumed for the consented scheme).
3.2.10	Paragraph 8.5.9	Embedded mitigation measures	The Scoping Report notes that embedded mitigation measures will be included within the design of the Proposed Development to reduce the effects of emissions on air quality. It is unclear what the embedded mitigation will be, given the limited scale of proposed works. The ES should clearly describe any mitigation which will be relied upon to avoid significant effects, including clarity as to any mitigation that is embedded within the design of the Proposed Development and / or the consented scheme.

### 3.3 Noise and Vibration

(Scoping Report Chapter 9)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.3.1	Paragraph 9.1.2	Assessment of noise effects on ecological or heritage receptors.	<p>The Scoping Report states that noise and vibration effects are considered on human receptors rather than on ecological or heritage receptors on the basis that in-combination effects on ecological receptors will be considered in the Ecology chapter. However, there is no reference to noise and vibration impacts within the Ecology Chapter of the Scoping Report. The ES should ensure that all matters referenced are addressed within the relevant chapters.</p> <p>However, considering the distance from ecological and heritage receptors, the Inspectorate agrees that this matter can be scoped out of the ES.</p>
3.3.2	Paragraph 9.5.5	Operational vibration effects	<p>The Applicant proposes to scope out operational vibration effects as no major vibration sources are envisaged as part of the consented scheme or the Proposed Development during operation.</p> <p>The Inspectorate agrees that this can be scoped out.</p>
3.3.3	Paragraph 9.6.3	Effects of piling	<p>The Applicant proposes to scope out effects of piling since there will be no piling as part of the Proposed Development.</p> <p>The Inspectorate agrees that this can be scoped out.</p>
3.3.4	Paragraph 9.6.4	Operational noise	<p>The Scoping Report proposes to scope out operational noise as no changes in operational noise are likely. It also states that this will be confirmed using sound power level data.</p> <p>In the absence of information to demonstrate that the extended operation will be no worse than currently consented, the Inspectorate</p>



ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			<p>cannot agree to scope this matter out at this stage. An assessment of operational noise effects should be provided, unless otherwise justified.</p> <p>The Inspectorate also notes that the Proposed Development involves an increase in operational hours of c. 10% compared with the consented scheme (see ID 2.1.2 above). As such, the ES should also demonstrate that the increase in operational hours will not result in any likely significant effects in relation to noise.</p>
3.3.5	Paragraph 9.6.10	Noise effects during decommission	<p>The Scoping Report proposes that noise effects during the decommissioning phase will not be included in the assessment as the assessment of construction noise will be representative of the decommissioning phase.</p> <p>The Inspectorate agrees that a separate assessment of noise effects during decommissioning can be scoped out on this basis.</p>
3.3.6	Paragraph 9.6.13	Vibration effects during construction	<p>The Applicant proposes to scope out construction phase vibration due to "<i>the nature of the works to install the Proposed Development</i>". However, the Scoping Report does not provide detail regarding the proposed construction works. Additionally, the Inspectorate notes that in paragraph 3.4.6 of the Scoping Report the Applicant proposes to include mitigation of noise and vibration within the CEMP, which suggests that some impacts during construction are anticipated.</p> <p>As such, the Inspectorate is of the opinion that this matter cannot be scoped out at this stage. The ES should assess the likely significant effects of vibration during the construction phase, as well as any mitigation measures proposed.</p>

<b>ID</b>	<b>Ref</b>	<b>Description</b>	<b>Inspectorate's comments</b>
	N/A	N/A	N/A

### 3.4 Ecology

(Scoping Report Chapter 10)

<b>ID</b>	<b>Ref</b>	<b>Applicant's proposed matters to scope out</b>	<b>Inspectorate's comments</b>
	N/A	N/A	No matters have been proposed to be scoped out of the assessment.

<b>ID</b>	<b>Ref</b>	<b>Description</b>	<b>Inspectorate's comments</b>
3.4.1	Chapter 10	Impact Risk Zones (IRZs)	The ES should reference that the Proposed Development is located within the IRZ for Burnham Beeches SAC, Windsor Forest and Great Park, SAC and South West London Waterbodies SPA.

### 3.5 Climate Change

(Scoping Report Chapter 11)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.5.1	Table 11.6	In-combination climate change impact assessment – temperature change.	<p>Table 11.3 of the Scoping Report sets out that when using Representative Concentration Pathway (RCP) 8.5, temperatures are projected to rise between the years of 2060 and 2089 in all climate variable scenarios.</p> <p>The Scoping Report does not set out whether any operational changes would be required to accommodate the temperature increases. For example, it is not clear whether the output of the pumps associated with Cooling Tower 8 would need to be increased during periods of higher temperatures which could lead to greater noise levels and effects on receptors. It is also unclear what effect the higher temperatures will have on ecological receptors.</p> <p>Additionally, Table 11.6 of the Scoping Report provides no evidence explaining whether the materials and machinery in the operational phase of the Proposed Development will be able to operate in higher temperatures.</p> <p>Therefore, at this stage the Inspectorate cannot agree to scope this matter out.</p>
3.5.2	Table 11.6	In-combination climate change impact assessment – sea level rise.	<p>Table 11.6 of the Scoping Report asserts that the site is not located in an area that is susceptible to sea level rise. The Inspectorate agrees that sea level rise can be scoped out of the in-combination climate change assessment on this basis.</p>

<b>ID</b>	<b>Ref</b>	<b>Applicant's proposed matters to scope out</b>	<b>Inspectorate's comments</b>
3.5.3	Table 11.6	In-combination climate change impact assessment – precipitation change.	<p>The justification provided in Table 11.6 for scoping out this matter is that no significant effects are likely to arise as "<i>the flow of precipitation to ground will not be significantly hindered</i>". The Inspectorate notes that the Flood Risk Assessment (FRA) provided for the consented scheme concluded that the site layout had been designed to accommodate surface water from storms plus climate change.</p> <p>On this basis and that an FRA will be submitted as part of the DCO application from the Proposed Development, the Inspectorate agrees that this matter can be scoped out.</p>
3.5.4	Table 11.6	In-combination climate change impact assessment – wind.	<p>It is noted that the external massing of the Proposed Development will be that of the consented scheme, on this basis the Inspectorate considers that further consideration of wind impacts may be scoped out.</p>
3.5.5	Table 11.7	Climate Change Resilience Review – sea level rise.	<p>Table 11.7 of the Scoping Report asserts that the site is not located in an area that is susceptible to sea level rise. The Inspectorate agrees that sea level rise can be scoped out of the climate resilience review assessment.</p>

<b>ID</b>	<b>Ref</b>	<b>Description</b>	<b>Inspectorate's comments</b>
	N/A	N/A	N/A

### 3.6 Flood Risk, Drainage and Surface Water

(Scoping Report Section 12.2)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.6.1	Paragraphs 12.2.2 and 12.2.16	Construction effects.	<p>The Inspectorate notes that the FRA provided for the consented scheme found that the site lies within Flood Zone 1 and is therefore at low risk of flooding from fluvial and tidal sources. Flooding from ground sources was also found to be at low risk and there was no risk from artificial sources.</p> <p>The Inspectorate has also drawn on the ES submitted for the consented scheme which concluded that all the construction residual effects relating to the Water Resource and Flood Risk Chapter assessment were negligible. Flood risks to the site from sewers and surface water were considered to be moderate.</p> <p>Paragraphs 12.2.2 and 12.2.12 of the Scoping Report state that no new ground will be broken as part of the construction works for the Proposed Development. Additionally paragraphs 12.2.13 to 12.2.16 set out a high-level overview of the mitigation measures that will be delivered as part of the CEMP. For these reasons the Applicant has scoped out construction effects.</p> <p>On this basis, the Inspectorate agrees that this can be scoped out as it is unlikely that any significant effects will arise.</p>
3.6.2	Paragraphs 12.2.3, 12.2.18 and 12.2.19	Water environment - operational effects.	<p>Paragraph 12.2.3 of the Scoping Report states that the during the operational phase of the development, it is not anticipated to be any changes to the demand or discharge of water compared to the consented scheme. Paragraph 12.2.18 of the Scoping Report explains the potable water demand for the Proposed Development will be the same or less than the consented scheme. The ES for the consented scheme concluded that all residual operational effects for the Water</p>

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			<p>Resource and Flood Risk assessment were either negligible or negligible / minor beneficial.</p> <p>The Inspectorate agrees that effects on water resources can be scoped out based on the conclusions drawn in the original ES and subject to confirmation that water demand and any discharges are the same or less than the consented development.</p>
3.6.3	Paragraph 12.2.20	Morphological impacts to watercourses.	<p>The Scoping Report scopes out effects on surface watercourses due to distance of the site from watercourses.</p> <p>According to the FRA provided for the consented scheme, the site is served by a separate foul and surface water sewer. The discharge from the foul sewer discharges to the Slough Sewage Treatment Works where it is treated before flowing into the River Thames. Surface water from the site discharges into Salt Hill Stream, a tributary of the River Thames. During high flow, surface water overflows from the site enter another sewer system that discharges to Chalvery Brook, another tributary of the River Thames.</p> <p>The Inspectorate notes that the ES provided for the consented scheme concluded that negligible residual effects were likely to occur during the construction phase for waste water generation and the disturbance of the existing drainage and water supply networks. Similarly, negligible residual effects were predicted during the operational phase for water supply and wastewater generation and sewer flooding.</p> <p>The Inspectorate agrees that this matter may be scoped out from further assessment.</p>

<b>ID</b>	<b>Ref</b>	<b>Applicant's proposed matters to scope out</b>	<b>Inspectorate's comments</b>
3.6.4	Paragraph 12.2.21	Surface and groundwater environment - decommissioning effects	Decommissioning effects relating to the surface and groundwater environment are proposed to be scoped out as effects are likely to be similar to those at the construction phase. This paragraph reasons that when considered with standard mitigation measures, no significant effects are likely to arise.  For the reasons identified in ID 3.6.1 and ID 3.6.2, the Inspectorate agrees that this can be scoped out as it is unlikely that any significant effects will arise.

<b>ID</b>	<b>Ref</b>	<b>Description</b>	<b>Inspectorate's comments</b>
3.6.5	N/A	N/A	N/A



### 3.7 Major Accidents and Disasters

(Scoping Report Section 12.3)

<b>ID</b>	<b>Ref</b>	<b>Applicant's proposed matters to scope out</b>	<b>Inspectorate's comments</b>
3.7.1	N/A	N/A	No matters have been proposed to be scoped out of the assessment.

<b>ID</b>	<b>Ref</b>	<b>Description</b>	<b>Inspectorate's comments</b>
3.7.2	Paragraph 12.3.4	General methodology	It is unclear which phase of development the Scoping Report is referring to. The ES should consider the potential for significant effects from major accidents and disasters during construction, operation and decommissioning.

### 3.8 Topics to be Scoped Out

(Scoping Report Chapter 13)

ID	Ref	Applicant's proposed aspects to scope out	Inspectorate's comments
3.8.1	Section 13.2	Aviation	<p>The Applicant considers that the engineering works comprising the Proposed Development (an 'Extension' to the existing consented scheme) will "<i>for the most part</i>" be internal with no change to the size of the multifuel building or stack from beyond that already approved under the consented scheme (during cranes and other equipment construction and long-term operation).</p> <p>The Inspectorate understands that all structures of the consented scheme (the height and size of which will not be exceeded by the Proposed Development) will be less than the height of the existing 'north stack' and that no aviation safeguarding objections were raised as part of the consented scheme.</p> <p>On this basis, the Inspectorate agrees that this aspect can be scoped out of the ES, but it should demonstrate that the increased operational hours (as set out in ID 2.1.2 above) would not result in visible plume effects beyond those assessed as part of the consented scheme which could be significant.</p>
3.8.2	Section 13.3	Cultural Heritage	<p>The Applicant considers that the engineering works comprising the Proposed Development will "<i>not involve any breaking of ground or underground works, and therefore has no potential to affect buried archaeology</i>". Similarly it will not change the height, building envelope or massing of the consented scheme (albeit a single, additional pipe at c. 18m above ground level will be required of similar dimensions and in the same location as three pipes that are approved under the consented scheme, as set out in paragraph 3.4.5. of the Scoping Report).</p>

ID	Ref	Applicant's proposed aspects to scope out	Inspectorate's comments
			<p>This additional external aspect would be in the context of the backdrop of the consented scheme and there are not expected to be any material changes to the visual amenity from above ground heritage assets or affect the setting of any heritage assets.</p> <p>The Proposed Development site is also within a historically established urban industrial estate within the wider urban landscape.</p> <p>The Inspectorate agrees that this aspect can be scoped out of the ES on the basis of:</p> <ul style="list-style-type: none"> <li>▪ The limited extent of external engineering works that comprise the Proposed Development, in the context of the consented scheme; and</li> <li>▪ The lack of any below ground interventions required for the engineering works that comprise the Proposed Development.</li> </ul> <p>The Inspectorate notes that the ES prepared for the consented scheme concluded that there were no significant residual effects in terms of cultural heritage and archaeology and that no specific mitigation measures were proposed in reaching this conclusion.</p>
3.8.3	Section 13.4	Landscape and Visual Amenity	<p>The Applicant states that engineering works associated with the Proposed Development will be "<i>indistinguishable from the construction of the consented scheme</i>" as they will mostly be located within the consented scheme buildings. They also rule out the potential for likely significant effects given the "<i>negligible external works planned</i>" as part of the Proposed Development (beyond those associated with the consented scheme). Plates 13.1 to 13.3 show the limited extent of the visibility of the additional pipe referred to in paragraph 3.4.5 of the Scoping Report, described as being "<i>the only expected external amendment associated with the Proposed Development [beyond the consented scheme]</i>".</p>

ID	Ref	Applicant's proposed aspects to scope out	Inspectorate's comments
			<p>On the basis of the limited extent of external works associated with the Proposed Development, as well as its setting within an existing and long established industrial estate in a built up urban area, the Inspectorate agrees that this aspect can be scoped out of the ES.</p> <p>The ES prepared for the consented scheme 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. Visual effects were predicted to be at worse, moderate adverse during construction, reducing to minor adverse and not significant during long-term operation. The ES should demonstrate that the increased operational hours (as set out in ID 2.1.2 above) would not result in visible plume effects beyond those assessed as part of the consented scheme LVIA and which could be significant.</p>
3.8.4	Section 13.5	Telecommunications	<p>The ES for the consented scheme assessed potential effects on digital terrestrial and satellite television reception, radio reception, mobile telephone signals, wireless networks and emergency service communications. It concluded that there were no significant adverse effects and negligible residual effects.</p> <p>On the basis that the engineering works associated with the Proposed Development are predominantly internal and the height, scale and massing of the consented scheme remain unaltered (construction and operation), the Inspectorate agrees that this aspect can be scoped out of the ES.</p>
3.8.5	Section 13.6	Ground Conditions	<p>The Inspectorate notes that the extent of physical engineering works associated with the Proposed Development are limited and that no additional ground disturbance is anticipated as part of the Proposed Development. The Inspectorate agrees that significant effects on ground conditions associated with the Proposed Development (beyond</p>

ID	Ref	Applicant's proposed aspects to scope out	Inspectorate's comments
			<p>those considered as part of the consented scheme) are unlikely and that this aspect can be scoped out of the ES.</p> <p>The Applicant refers to the "<i>environmental design and management measures indicated in the 2014 ES</i>" being "<i>expected to remain valid for the works associated with the Proposed Development</i>", although limited information is provided as part of the Scoping Opinion as to what these comprise. The description of the Proposed Development in the ES should provide details regarding measures that are relied on to exclude significant effects on ground conditions.</p>
3.8.6	Section 13.7	Waste – construction phase	<p>The Applicant states that the Proposed Development will not lead to any significant increase in construction waste over and above that from the consented scheme. Quantities of operational waste generated (e.g. incinerator bottom ash and flue gas treatment residues) will not be increased by the Proposed Development and the WDF throughput will not be beyond the consented scheme as set out in section 3.5 of the Scoping Report.</p> <p>Paragraph 3.4.6 of the Scoping Report sets out the Applicant's intention to prepare a framework CEMP as part of the DCO application, to be carried forward to a detailed CEMP prior to construction.</p> <p>The framework CEMP will consider waste generation, segregation and disposal in accordance with the waste hierarchy with references to compliance with the Hazardous Waste Regulations 2005 (as amended) and the Waste (England and Wales) Regulations 2011.</p> <p>The Inspectorate agrees that significant effects in terms of waste during construction of the Proposed Development are unlikely to occur beyond those associated with the consented scheme and that this aspect can be scoped out of the ES.</p>

ID	Ref	Applicant's proposed aspects to scope out	Inspectorate's comments
3.8.7	Section 13.7	Waste – operational phase	<p>It is noted that there will be an increase throughput of waste during the operational phase, the Inspectorate expects the project description and transport assessment chapters of the ES to explain any changes in end destination / re-use / recycling options and assumptions (e.g. quantities and frequencies of deliveries) made in this regard during the operation of the Proposed Development.</p>
3.8.8	Section 13.8	Human Health	<p>The Scoping Report states that “<i>there may be some minimal impacts generated by the Proposed Development (such as noise and air quality)</i>”, the Inspectorate does not consider that significant health and well-being effects associated with these matters can be excluded prior to those assessments being undertaken.</p> <p>The Inspectorate is satisfied that these matters need not be duplicated / presented in a separate health aspect chapter, but these separate assessments should draw together the outcomes in terms of significance of effects and risks to health in accordance with Schedule 4 of the EIA Regulations.</p>
3.8.9	Section 13.9	Socio-economics	<p>Although the Applicant identifies that the engineering works comprising the Proposed Development “<i>may generate a number of temporary and permanent socioeconomic effects</i>”, it is not anticipated that they would result in significant effects given the limited increase in the predicted workforce over the consented development.</p> <p>The Inspectorate agrees that socio-economic effects of the engineering works that comprise the Proposed Development are unlikely to be significant and can be scoped out of the ES.</p>

<b>ID</b>	<b>Ref</b>	<b>Description</b>	<b>Inspectorate's comments</b>
	N/A	N/A	N/A





## APPENDIX 1: CONSULTATION BODIES FORMALLY CONSULTED

**TABLE A1: PRESCRIBED CONSULTATION BODIES<sup>1</sup>**

<b>SCHEDULE 1 DESCRIPTION</b>	<b>ORGANISATION</b>
The Health and Safety Executive	Health and Safety Executive
The National Health Service Commissioning Board	NHS England
The relevant Clinical Commissioning Group	NHS Frimley Clinical Commissioning Group
Natural England	Natural England
The Historic Buildings and Monuments Commission for England	Historic England
The relevant fire and rescue authority	Royal Berkshire Fire and Rescue Service
The relevant police and crime commissioner	Thames Valley Police and Crime Commissioner
The Environment Agency	The Environment Agency
The Civil Aviation Authority	Civil Aviation Authority
The Relevant Highways Authority	Slough Borough Council
The relevant strategic highways company	National Highways
Transport for London	Transport for London
The Canal and River Trust	The Canal and River Trust
United Kingdom Health Security Agency	United Kingdom Health Security Agency
The Crown Estate Commissioners	The Crown Estate
The Secretary of State for Defence	Ministry of Defence

<sup>1</sup> Schedule 1 of The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 (the 'APFP Regulations')

**TABLE A2: RELEVANT STATUTORY UNDERTAKERS<sup>2</sup>**

<b>STATUTORY UNDERTAKER</b>	<b>ORGANISATION</b>
The relevant Clinical Commissioning Group	NHS Frimley Clinical Commissioning Group
The National Health Service Commissioning Board	NHS England
The relevant NHS Foundation Trust	South Central Ambulance Service NHS Foundation Trust
Railways	Network Rail Infrastructure Ltd
	Highways England Historical Railways Estate
Road Transport	Transport for London
Canal Or Inland Navigation Authorities	The Canal and River Trust
Civil Aviation Authority	Civil Aviation Authority
Licence Holder (Chapter 1 Of Part 1 Of Transport Act 2000)	NATS En-Route Safeguarding
Universal Service Provider	Royal Mail Group
Homes and Communities Agency	Homes England
The relevant Environment Agency	The Environment Agency
The relevant water and sewage undertaker	Thames Water
	Thames Water Commercial Services
The relevant public gas transporter	Cadent Gas Limited
	Last Mile Gas Ltd
	Energy Assets Pipelines Limited
	ES Pipelines Ltd
	ESP Networks Ltd

<sup>2</sup> 'Statutory Undertaker' is defined in the APFP Regulations as having the same meaning as in Section 127 of the Planning Act 2008 (PA2008)

STATUTORY UNDERTAKER	ORGANISATION
	ESP Pipelines Ltd
	ESP Connections Ltd
	Fulcrum Pipelines Limited
	Harlaxton Gas Networks Limited
	GTC Pipelines Limited
	Independent Pipelines Limited
	Indigo Pipelines Limited
	Leep Gas Networks Limited
	Murphy Gas Networks limited
	Quadrant Pipelines Limited
	Squire Energy Limited
	National Grid Gas Plc
	Scotland Gas Networks Plc
The relevant electricity generator with CPO Powers	SSE Enterprise Utilities
The relevant electricity distributor with CPO Powers	Eclipse Power Network Limited
	Energy Assets Networks Limited
	ESP Electricity Limited
	Forbury Assets Limited
	Fulcrum Electricity Assets Limited
	Harlaxton Energy Networks Limited
	Independent Power Networks Limited
	Indigo Power Limited
	Last Mile Electricity Ltd
	Murphy Power Distribution Limited

STATUTORY UNDERTAKER	ORGANISATION
	The Electricity Network Company Limited
	UK Power Distribution Limited
	Utility Assets Limited
	Vattenfall Networks Limited
	UK Power Networks Limited
The relevant electricity transmitter with CPO Powers	National Grid Electricity Transmission Plc
	National Grid Electricity System Operator Limited

**TABLE A3: SECTION 43 LOCAL AUTHORITIES (FOR THE PURPOSES OF SECTION 42(1)(B))<sup>3</sup>**

LOCAL AUTHORITY <sup>4</sup>
Slough Borough Council
Royal Borough of Windsor and Maidenhead
Surrey County Council
Spelthorne Borough Council
London Borough of Hillingdon
Buckinghamshire Council

<sup>3</sup> Sections 43 and 42(B) of the PA2008

<sup>4</sup> As defined in Section 43(3) of the PA2008

## **APPENDIX 2: RESPONDENTS TO CONSULTATION AND COPIES OF REPLIES**

<b>CONSULTATION BODIES WHO REPLIED BY THE STATUTORY DEADLINE:</b>
Cadent Gas Limited
The Canal and River Trust
The Environment Agency
Health and Safety Executive
Historic England
National Grid Electricity Transmission Plc and National Grid Gas Plc
National Highways
NATS En-Route Safeguarding
Natural England
Royal Berkshire Fire and Rescue Service
Royal Mail Group
Slough Borough Council
Surrey County Council
Thames Water
Transport for London
United Kingdom Health Security Agency

Your Ref:  
Date: 22 November 2021

**Cadent Gas Limited**  
Ashbrook Court, Prologis Park  
Central Boulevard  
Coventry CV7 8PE  
[cadentgas.com](http://cadentgas.com)

Submitted via email: [SloughMultifuelProject@planninginspectorate.gov.uk](mailto:SloughMultifuelProject@planninginspectorate.gov.uk)



**Ref: Slough Multifuel Project Public Consultation – non Statutory Consultation**

I refer to your email dated 19<sup>th</sup> November 2021 regarding the above proposed DCO. Cadent has reviewed the non Statutory Consultation report provided and wishes to make the following comments.

In respect of existing Cadent infrastructure, Cadent will require appropriate protection for retained apparatus including compliance with relevant standards for works proposed within close proximity of its apparatus.

**Cadent Infrastructure within or in close proximity to the development**

Cadent has identified at this stage the following apparatus within the vicinity of the proposed works:

- Intermediate pressure (above 2 bar) gas pipelines and associated equipment
- Medium pressure
- Low Pressure

**Should any diversions be required to facilitate the scheme, Cadent will require adequate notice and discussions should be started at the earliest opportunity. Please be aware that diversions for high pressure apparatus can take in excess of two years to plan and procure materials**

**Where the Promoter intends to acquire land, extinguish rights, or interfere with any of Cadent's apparatus, Cadent will require appropriate protection and further discussion on the impact to its apparatus and rights including adequate Protective Provisions.**

**Where diversions are required to facilitate the scheme, it is essential that adequate temporary and permanent land take, land rights and consents are included within the Order to enable works to proceed in time and to provide appropriate rights for Cadent to access, maintain and protect apparatus in future**

**Key Considerations:**

- Cadent has a Deed of Grant of Easement for each pipeline, which prevents the erection of permanent / temporary buildings, or structures, change to existing ground levels, storage of materials etc.
- Please be aware that written permission is required before any works commence within the Cadent easement strip.
- The below guidance is not exhaustive and all works in the vicinity of Cadent's asset shall be subject to review and approval from Cadent's plant protection team in advance of commencement of works on site.



#### General Notes on Pipeline Safety:

- You should be aware of the Health and Safety Executives guidance document HS(G) 47 "Avoiding Danger from Underground Services", and Cadent's Dial Before You Dig Specification for Safe Working in the Vicinity of Cadent Assets. There will be additional requirements dictated by Cadent's plant protection team.
- Cadent will also need to ensure that its pipelines remain accessible during and after completion of the works.
- The actual depth and position must be confirmed on site by trial hole investigation under the supervision of a Cadent representative. Ground cover above our pipelines should not be reduced or increased.
- If any excavations are planned within 3 metres of Cadent High Pressure Pipeline or, within 10 metres of an AGI (Above Ground Installation), or if any embankment or dredging works are proposed then the actual position and depth of the pipeline must be established on site in the presence of a Cadent representative. A safe working method agreed prior to any work taking place in order to minimise the risk of damage and ensure the final depth of cover does not affect the integrity of the pipeline.
- Below are some examples of work types that have specific restrictions when being undertaken in the vicinity of gas assets therefore consultation with Cadent's Plant Protection team is essential:
  - Demolition
  - Blasting
  - Piling and boring
  - Deep mining
  - Surface mineral extraction
  - Landfilling
  - Trenchless Techniques (e.g. HDD, pipe splitting, tunnelling etc.)
  - Wind turbine installation
  - Solar farm installation
  - Tree planting schemes

#### Pipeline Crossings:

- Where existing roads cannot be used, construction traffic should ONLY cross the pipeline at agreed locations.
- The pipeline shall be protected, at the crossing points, by temporary rafts constructed at ground level. The third party shall review ground conditions, vehicle types and crossing frequencies to determine the type and construction of the raft required.
- The type of raft shall be agreed with Cadent prior to installation.
- No protective measures including the installation of concrete slab protection shall be installed over or near to the Cadent pipeline without the prior permission of Cadent.
- Cadent will need to agree the material, the dimensions and method of installation of the proposed protective measure.

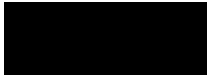


- The method of installation shall be confirmed through the submission of a formal written method statement from the contractor to Cadent.
- A Cadent representative shall monitor any works within close proximity to the pipeline.

New Service Crossing:

- New services may cross the pipeline at perpendicular angle to the pipeline i.e. 90 degrees.
- Where a new service is to cross over the pipeline a clearance distance of 0.6 metres between the crown of the pipeline and underside of the service should be maintained. If this cannot be achieved the service shall cross below the pipeline with a clearance distance of 0.6 metres.
- A new service should not be laid parallel within an easement strip
- A Cadent representative shall approve and supervise any new service crossing of a pipeline.
- An exposed pipeline should be suitable supported and removed prior to backfilling
- An exposed pipeline should be protected by matting and suitable timber cladding
- For pipe construction involving deep excavation (<1.5m) in the vicinity of grey iron mains, the model consultative procedure will apply therefore an integrity assessment must be conducted to confirm if a diversion is required

Yours Faithfully



**Vicky Cashman**

Planning & Consents

General Counsel Department

Email: 





## **Further Guidance**

To download a copy of the HSE Guidance HS(G)47, please use the following link:

<https://www.hse.gov.uk/pubns/books/hsg47.htm>

Specification for safe working in the vicinity of Cadent assets - requirements for third parties:

<https://cadentgas.com/nggdwsdev/media/Downloads/Digging%20Safely/Dial-before-you-dig-brochure.pdf>

Dial before you dig guidance:

<https://cadentgas.com/nggdwsdev/media/Downloads/Digging%20Safely/Dial-before-you-dig-leaflet.pdf>

Essential Guidance on digging safely near our pipes:

<https://cadentgas.com/help-advice/digging-safely>

Tree Planting Guidance:

<https://cadentgas.com/nggdwsdev/media/Downloads/Digging%20Safely/Tree-planting-guidance-Cadent-for-web.pdf>

Excavating Safely in the vicinity of gas pipes guidance (Credit card):

[https://cadentgas.com/nggdwsdev/media/Downloads/Digging%20Safely/Excavating\\_Safely\\_Leaflet\\_Gas-1.pdf](https://cadentgas.com/nggdwsdev/media/Downloads/Digging%20Safely/Excavating_Safely_Leaflet_Gas-1.pdf)

The Planning Inspectorate  
Environmental Services  
Central operations  
Temple Quay House  
2 The Square  
Bristol  
BS1 6PN

**Your Ref** EN010129-000012

**Our Ref** IPP - 149

**Friday 17<sup>th</sup> December 2021**

Dear Richard Kent,

**NSIP: SSE Slough Multifuel Limited: Scoping consultation**

**Waterway: Slough Arm (Grand Union Canal)**

Thank you for your consultation.

We are the charity who look after and bring to life 2000 miles of canals & rivers. Our waterways contribute to the health and wellbeing of local communities and economies, creating attractive and connected places to live, work, volunteer and spend leisure time. These historic, natural and cultural assets form part of the strategic and local green-blue infrastructure network, linking urban and rural communities as well as habitats. By caring for our waterways and promoting their use we believe we can improve the wellbeing of our nation. The Trust is a prescribed consultee in the Nationally Significant Infrastructure Projects (NSIPs) process.

The Trust has reviewed the proposals and on the basis that they appear unlikely to have any impact on our waterway we have **no** comment to make at this time.

If the proposals become significantly altered, we ask that you re-consult us in order that we can re-consider this position.

Please do not hesitate to contact me with any queries you may have.

Yours sincerely,

**Anne Denby MRTPI**  
Area Planner

<https://canalrivertrust.org.uk/specialist-teams/planning-and-design>

**Canal & River Trust**

Fradley Junction, Alrewas, Burton-upon-Trent, Staffordshire DE13 7DN

**T** [canalrivertrust.org.uk/contact-us](https://canalrivertrust.org.uk/contact-us) **W** [canalrivertrust.org.uk](https://canalrivertrust.org.uk)

Mr Richard Kent  
The Planning Inspectorate  
Temple Quay House  
2 The Square,  
Temple Quay  
Bristol  
BS1 6PN

**Our ref:** WA/2021/129509/01-L01  
**Your ref:** EN010129-000012  
**Date:** 17 December 2021

Dear Mr Kent

**EIA Scoping Request Relating To An Application By SSE Slough Multifuel Limited (The Applicant) For An Order Granting Development Consent For The Slough Multifuel Extension Project (The Proposed Development)**

**342 Edinburgh Avenue, Slough, SL1 4TU.**

Thank you for consulting us on the EIA scoping request relating to the proposed development noted above. We have reviewed the Slough Multifuel Extension Project Environment Impact Assessment Scoping Report, dated November 2021 and prepared by AECOM.

We acknowledge a previously consented scheme (up to 50MWe) was granted planning permission by Slough Borough Council in June 2017 and site works commenced in May 2021.

As noted in paragraph 1.1.4 and chapter 3 of the submitted EIA Scoping Report, we understand that this scheme (the extension) involves improving the efficiency with an increase in the gross generation of the previously consented scheme currently under construction from up to 50MWe to up to 60MWe and that this will be achieved through a range of measures including:

- installing primary and secondary air preheating systems to the boilers;
- increasing the thermal efficiency of the generating station, including heat exchanger bundles, pipework, valves, pipe supports, thermal insulation, instrumentation, cabling and containment,
- implementing mechanical modifications to the steam turbine inlet control valve to increase the steam capacity;
- implementing mechanical modifications to the turbine control system and distributed control system to allow for an increase in the gross output of the generating station.

We acknowledge that many of these works will be internal in nature and also within the current development envelope of the previously consented scheme.

Cont/d..

This NSIP application and associated Development Consent Order (DCO) will likely seek to incorporate all relevant planning and related consents. Therefore we have considered the proposed development and the submitted EIA Scoping Report with regards to our role as a statutory consultee within the planning system and as an environmental regulator.

The environmental constraints relating to the Environment Agency's planning remit are limited for this proposal. However, there are a number of topics that are relevant to our role as an environmental regulator and the related environmental permits.

Based on the submitted description of the proposed development we are content with the rational and environmental topics to be scoped in and out of the forthcoming Environmental Statement.

Once again, thank you for contacting us. Our comments are based on the best available data and the information as submitted to us at this time.

If you have any queries please contact me.

Yours sincerely

On behalf of

**Miss Judith Montford**  
**Planning Specialist**

[Redacted signature block]

To: SloughMultifuelProject@planninginspectorate.gov.uk



CEMHD Policy - Land Use Planning,  
NSIP Consultations,  
Building 1.2,  
Redgrave Court,  
Merton Road,  
Bootle, Merseyside  
L20 7HS.

HSE email: [NSIP.applications@hse.gov.uk](mailto:NSIP.applications@hse.gov.uk)

FAO Katie Norris  
The Planning Inspectorate  
Temple Quay House  
Temple Quay  
Bristol  
BS1 6PN  
By email only

Dear Ms Norris,

02 December 2021

**PROPOSED SLOUGH MULTIFUEL EXTENTION PROJECT (the project)  
PROPOSAL BY SSE SLOUGH MULTIFUEL LIMITED (the applicant)  
INFRASTRUCTURE PLANNING (ENVIROMENTAL IMPACT ASSESSMENT) REGULATIONS 2017 (as  
amended) REGULATIONS 10 and 11**

Thank you for your letter of the 19 November 2021 regarding the information to be provided in an environmental statement relating to the above project. HSE does not comment on EIA Scoping Reports but the following information is likely to be useful to the applicant.

**HSE's land use planning advice**

Will the proposed development fall within any of HSE's consultation distances?

According to HSE's records the proposed DCO application boundary for this Nationally Significant Infrastructure Project is not within any consultation zones of major accident hazard sites or major accident hazard pipelines.

This is based on the current configuration as illustrated in, for example, figure 1 'Site Location Plan within the document 'SLOUGH MULTIFUEL EXTENSION PROJECT ENVIRONMENTAL IMPACT ASSESSMENT SCOPING REPORT NOVEMBER 2021'

HSE's Land Use Planning advice would be dependent on the location of areas where people may be present. When we are consulted by the Applicant with further information under Section 42 of the Planning Act 2008, we can provide full advice.

Hazardous Substance Consent

The presence of hazardous substances on, over or under land at or above set threshold quantities (Controlled Quantities) will probably require Hazardous Substances Consent (HSC) under the Planning (Hazardous Substances) Act 1990 as amended. The substances, alone or when aggregated with others for which HSC is required, and the associated Controlled Quantities, are set out in The Planning (Hazardous Substances) Regulations 2015 as amended.

HSC would be required to store or use any of the Named Hazardous Substances or Categories of Substances at or above the controlled quantities set out in Schedule 1 of these Regulations.

Further information on HSC should be sought from the relevant Hazardous Substances Authority.

### Consideration of risk assessments

Regulation 5(4) of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 requires the assessment of significant effects to include, where relevant, the expected significant effects arising from the proposed development's vulnerability to major accidents. HSE's role on NSIPs is summarised in the following Advice Note 11 Annex on the Planning Inspectorate's website - [Annex G – The Health and Safety Executive](#). This document includes consideration of risk assessments on page 3.

### Explosives sites

HSE has no comment to make as there are no licensed explosives sites in the vicinity.

### Electrical Safety

No comment from a planning perspective.

At this time, please send any further communication on this project directly to the HSE's designated e-mail account for NSIP applications at [nsip.applications@hse.gov.uk](mailto:nsip.applications@hse.gov.uk). We are currently unable to accept hard copies, as our offices have limited access.

Yours sincerely,

■

Monica Langton  
CEMHD4 NSIP Consultation Team



Historic England

Mr Richard Kent  
By email only

Direct Dial: [REDACTED]

Our ref: PL00759745

7<sup>th</sup> December 2021

Dear Mr Kent,

**Planning Act 2008 (as amended) and The Infrastructure Planning  
(Environmental Impact Assessment) Regulations 2017 (the EIA Regulations)**

**Application by SSE Slough Multifuel Limited (the Applicant) for an Order  
granting Development Consent for the Slough Multifuel Extension Project (the  
Proposed Development)**

Thank you for consulting Historic England on the proposals above.

Having reviewed the information we have no comments to make.

Yours sincerely,

Rachel Fletcher

Inspector of Historic Buildings and Areas

[REDACTED]



Historic England, 4<sup>th</sup> Floor, Cannon Bridge House, 25 Dowgate Hill, London EC4R 2YA  
Telephone 020 7973 3700 Facsimile 020 7973 3001  
HistoricEngland.org.uk

Please note that Historic England operates an access to information policy.  
Correspondence or information which you send us may therefore become publicly available.



Anne Holdsworth  
DCO Liaison Officer  
Land & Business Support

[REDACTED]  
[REDACTED]

SUBMITTED ELECTRONICALLY: [www.nationalgrid.com](http://www.nationalgrid.com)  
[SloughMultifuelProject@planninginspectorate.gov.uk](mailto:SloughMultifuelProject@planninginspectorate.gov.uk)

14<sup>th</sup> December 2021

Dear Sir / Madam

**RE: Application by SSE Slough Multifuel Limited (the Applicant) for an Order granting Development Consent for the Slough Multifuel Extension Project (the Proposed Development) Scoping consultation**

I refer to your letter dated 19<sup>th</sup> November 2021 regarding the above Proposed Development.

This is a response on behalf of National Grid Electricity Transmission PLC (NGET) and National Grid Gas PLC (NGG).

**Electricity Transmission**

National Grid Electricity Transmission has no apparatus within or in close proximity to the proposed site boundary.

**Gas Transmission**

National Grid Gas has no apparatus within or in close proximity to the proposed site boundary.

If you require any further information, please do not hesitate to contact me.

Yours faithfully

[REDACTED]

**Anne Holdsworth**  
**DCO Liaison Officer, Land and Acquisitions**



**From:** [Blake, Patrick](#)  
**To:** [Slough Multifuel Project](#)  
**Cc:** [REDACTED]  
**Subject:** 7169 EN010129-000012 - Slough Multifuel Project - EIA Scoping Report Notification and Consultation  
**Date:** 09 December 2021 15:13:54

---

**For the attention of:** Richard Kent, Senior EIA Advisor on behalf of the Secretary of State

**Reference:** EN010129-000012

**Our reference:** 7169

**Location:** Slough Multifuel Project, 342 Edinburgh Avenue, Slough Trading Estate, Slough, Berkshire

**Proposal:** The extension of a multifuel combined heat and power (CHP) electricity generating station from up to 50 megawatts (MW) gross output to up to 60 MW gross output.

-  
Dear Richard,

Thank you for consulting National Highways in regard to the Scoping Report for the proposed extension to the Slough Multifuel Project, Slough Trading Estate, Slough, Berkshire.

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

We will therefore be concerned with proposals that have the potential to impact the safe and efficient operation of the SRN, in this case the M4.

We have no comments on the Scoping Report available on the National Infrastructure Planning portal, we look forward to working with the Applicant to develop the scope for any subsequent Transport assessment (TA) and we would expect the TA to assess any potential impacts on the SRN, in particular the M4. Due to the above we would strongly recommend early engagement with the Applicant prior to the submission of the Development Consent Order.

I hope this is helpful.

Kind Regards

**Patrick Blake, Area 3 Spatial Planning Manager**

National Highways | Bridge House | 1 Walnut Tree Close | Guildford | Surrey | GU1 4LZ  
[REDACTED]

Web: <http://www.highways.gov.uk>

GTN: 0300 470 1043

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**Birmingham B32 1AF | [https://www.gov.uk/government/organisations/highways-](https://www.gov.uk/government/organisations/highways-england)**  
**[england](https://www.gov.uk/government/organisations/highways-england) | [info@highwaysengland.co.uk](mailto:info@highwaysengland.co.uk)**

*Registered in England and Wales no 9346363 | Registered Office: Bridge House,  
1 Walnut Tree Close, Guildford, Surrey GU1 4LZ*

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**From:** [NATS Safeguarding](#)  
**To:** [Slough Multifuel Project](#)  
**Subject:** RE: EN010129 - Slough Multifuel Project - EIA Scoping Report Notification and Consultation [SG32435]  
**Date:** 23 November 2021 10:44:41  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.png](#)  
[image004.png](#)  
[image005.png](#)  
[image006.png](#)

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Our Ref: SG32435

Dear Sir/Madam

The proposed development has been examined from a technical safeguarding aspect and does not conflict with our safeguarding criteria. Accordingly, NATS (En Route) Public Limited Company (NERL) has no safeguarding objection to the proposal.

However, please be aware that this response applies specifically to the above consultation and only reflects the position of NATS (that is responsible for the management of en route air traffic) based on the information supplied at the time of this application. This letter does not provide any indication of the position of any other party, whether they be an airport, airspace user or otherwise. It remains your responsibility to ensure that all the appropriate consultees are properly consulted.

If any changes are proposed to the information supplied to NATS in regard to this application which become the basis of a revised, amended or further application for approval, then as a statutory consultee NERL requires that it be further consulted on any such changes prior to any planning permission or any consent being granted.

Yours faithfully

**NATS**

NATS Safeguarding



4000 Parkway, Whiteley,  
Fareham, Hants PO15 7FL  
[www.nats.co.uk](http://www.nats.co.uk)



Date: 10 December 2021  
Our ref: EN010129-000012  
Your ref: 375183



Planning Inspectorate  
SloughMultifuelProject@planninginspectorate.gov.uk

Customer Services  
Hornbeam House  
Crewe Business Park  
Electra Way  
Crewe  
Cheshire  
CW1 6GJ

T 0300 060 3900

**BY EMAIL ONLY**

Dear Richard Kent,

**Environmental Impact Assessment Scoping consultation (Regulation 15 (4) of the EIA Regulations 2017): Slough Multifuel Extension Project.**

Thank you for seeking our advice on the scope of the Environmental Statement (ES) in your consultation dated 19 November 2021 which we received on the same day.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Case law<sup>1</sup> and guidance<sup>2</sup> has stressed the need for a full set of environmental information to be available for consideration prior to a decision being taken on whether or not to grant planning permission. Annex A to this letter provides Natural England's advice on the scope of the Environmental Impact Assessment (EIA) for this development.

Should the proposal be amended in a way which significantly affects its impact on the natural environment then, in accordance with Section 4 of the Natural Environment and Rural Communities Act 2006, Natural England should be consulted again.

We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us. For any queries relating to the specific advice in this letter only please contact me at [ellen.satchwell@naturalengland.org.uk](mailto:ellen.satchwell@naturalengland.org.uk). For any new consultations, or to provide further information on this consultation please send your correspondences to [consultations@naturalengland.org.uk](mailto:consultations@naturalengland.org.uk).

Yours sincerely,

Ellen Satchwell  
Sustainable Development Lead Adviser  
Thames Solent Team

---

<sup>1</sup> Harrison, J in *R. v. Cornwall County Council ex parte Hardy* (2001)

<sup>2</sup> *Note on Environmental Impact Assessment Directive for Local Planning Authorities* Office of the Deputy Prime Minister (April 2004) available from <http://webarchive.nationalarchives.gov.uk/+http://www.communities.gov.uk/planningandbuilding/planning/sustainabilityenvironmental/environmentalimpactassessment/noteenvironmental/>

## **Annex A – Advice related to EIA Scoping Requirements**

### **1. General Principles**

Schedule 4 of the Town & Country Planning (Environmental Impact Assessment) Regulations 2017, sets out the necessary information to assess impacts on the natural environment to be included in an ES, specifically:

- A description of the development – including physical characteristics and the full land use requirements of the site during construction and operational phases.
- Expected residues and emissions (water, air and soil pollution, noise, vibration, light, heat, radiation, etc.) resulting from the operation of the proposed development.
- An assessment of alternatives and clear reasoning as to why the preferred option has been chosen.
- A description of the aspects of the environment likely to be significantly affected by the development, including, in particular, population, fauna, flora, soil, water, air, climatic factors, material assets, including the architectural and archaeological heritage, landscape and the interrelationship between the above factors.
- A description of the likely significant effects of the development on the environment – this should cover direct effects but also any indirect, secondary, cumulative, short, medium and long term, permanent and temporary, positive and negative effects. Effects should relate to the existence of the development, the use of natural resources and the emissions from pollutants. This should also include a description of the forecasting methods to predict the likely effects on the environment.
- A description of the measures envisaged to prevent, reduce and where possible offset any significant adverse effects on the environment.
- A non-technical summary of the information.
- An indication of any difficulties (technical deficiencies or lack of know-how) encountered by the applicant in compiling the required information.

It will be important for any assessment to consider the potential cumulative effects of this proposal, including all supporting infrastructure, with other similar proposals and a thorough assessment of the 'in combination' effects of the proposed development with any existing developments and current applications. A full consideration of the implications of the whole scheme should be included in the ES. All supporting infrastructure should be included within the assessment.

### **2. Biodiversity and Geology**

#### **2.1 Ecological Aspects of an Environmental Statement**

Natural England advises that the potential impact of the proposal upon features of nature conservation interest and opportunities for habitat creation/enhancement should be included within this assessment in accordance with appropriate guidance on such matters. Guidelines for Ecological Impact Assessment (EclA) have been developed by the Chartered Institute of Ecology and Environmental Management (CIEEM) and are available on their website.

EclA is the process of identifying, quantifying and evaluating the potential impacts of defined actions on ecosystems or their components. EclA may be carried out as part of the EIA process or to support other forms of environmental assessment or appraisal.

The National Planning Policy Framework sets out guidance in S.174-177 on how to take account of biodiversity interests in planning decisions and the framework that local authorities should provide to assist developers.

#### **2.2 Internationally and Nationally Designated Sites**

The ES should thoroughly assess the potential for the proposal to affect designated sites. European sites (e.g. designated Special Areas of Conservation and Special Protection Areas) fall within the scope of the Conservation of Habitats and Species Regulations 2017 (as amended). In addition paragraph 176 of the National Planning Policy Framework requires that potential Special

Protection Areas, possible Special Areas of Conservation, listed or proposed Ramsar sites, and any site identified as being necessary to compensate for adverse impacts on classified, potential or possible SPAs, SACs and Ramsar sites be treated in the same way as classified sites.

Under Regulation 63 of the Conservation of Habitats and Species Regulations 2017 (as amended) an appropriate assessment needs to be undertaken in respect of any plan or project which is (a) likely to have a significant effect on a European site (either alone or in combination with other plans or projects) and (b) not directly connected with or necessary to the management of the site.

Should a Likely Significant Effect on a European/Internationally designated site be identified or be uncertain, the competent authority (in this case the Local Planning Authority) may need to prepare an Appropriate Assessment, in addition to consideration of impacts through the EIA process.

### **Sites of Special Scientific Interest (SSSIs) and sites of European or international importance (Special Areas of Conservation, Special Protection Areas and Ramsar sites)**

The development site is within the Impact Risk Zone (IRZ) for the following designated nature conservation sites:

- Burnham Beeches SAC
- Windsor Forest and Great Park SAC
- South West London Waterbodies SPA

Further information on the SSSI and its special interest features can be found at [www.magic.gov](http://www.magic.gov). The Environmental Statement should include a full assessment of the direct and indirect effects of the development on the features of special interest and should identify such mitigation measures as may be required in order to avoid, minimise or reduce any adverse significant effects. In addition, European site conservation objectives are available on our internet site: <http://publications.naturalengland.org.uk/category/6490068894089216>

### **2.3 Regionally and Locally Important Sites**

The EIA will need to consider any impacts upon local wildlife and geological sites. Local Sites are identified by the local wildlife trust, geoconservation group or a local forum established for the purposes of identifying and selecting local sites. They are of county importance for wildlife or geodiversity. The Environmental Statement should therefore include an assessment of the likely impacts on the wildlife and geodiversity interests of such sites. The assessment should include proposals for mitigation of any impacts and if appropriate, compensation measures. Contact the local wildlife trust, geoconservation group or local sites body in this area for further information.

### **2.4 Protected Species - Species protected by the Wildlife and Countryside Act 1981 (as amended) and by the Conservation of Habitats and Species Regulations 2017 (as amended)**

The ES should assess the impact of all phases of the proposal on protected species (including, for example, great crested newts, reptiles, birds, water voles, badgers and bats). Natural England does not hold comprehensive information regarding the locations of species protected by law, but advises on the procedures and legislation relevant to such species. Records of protected species should be sought from appropriate local biological record centres, nature conservation organisations, groups and individuals; and consideration should be given to the wider context of the site for example in terms of habitat linkages and protected species populations in the wider area, to assist in the impact assessment.

The conservation of species protected by law is explained in Part IV and Annex A of Government Circular 06/2005 *Biodiversity and Geological Conservation: Statutory Obligations and their Impact within the Planning System*. The area likely to be affected by the proposal should be thoroughly surveyed by competent ecologists at appropriate times of year for relevant species and the survey results, impact assessments and appropriate accompanying mitigation strategies included as part of the ES.

In order to provide this information there may be a requirement for a survey at a particular time of year. Surveys should always be carried out in optimal survey time periods and to current guidance by suitably qualified and where necessary, licensed, consultants. Natural England has adopted

[standing advice](#) for protected species which includes links to guidance on survey and mitigation.

## **2.5 Habitats and Species of Principal Importance**

The ES should thoroughly assess the impact of the proposals on habitats and/or species listed as 'Habitats and Species of Principal Importance' within the England Biodiversity List, published under the requirements of S41 of the Natural Environment and Rural Communities (NERC) Act 2006. Section 40 of the NERC Act 2006 places a general duty on all public authorities, including local planning authorities, to conserve and enhance biodiversity. Further information on this duty is available here <https://www.gov.uk/guidance/biodiversity-duty-public-authority-duty-to-have-regard-to-conserving-biodiversity>.

Government Circular 06/2005 states that Biodiversity Action Plan (BAP) species and habitats, 'are capable of being a material consideration...in the making of planning decisions'. Natural England therefore advises that survey, impact assessment and mitigation proposals for Habitats and Species of Principal Importance should be included in the ES. Consideration should also be given to those species and habitats included in the relevant Local BAP.

Natural England advises that a habitat survey (equivalent to Phase 2) is carried out on the site, in order to identify any important habitats present. In addition, ornithological, botanical and invertebrate surveys should be carried out at appropriate times in the year, to establish whether any scarce or priority species are present. The Environmental Statement should include details of:

- Any historical data for the site affected by the proposal (e.g. from previous surveys);
- Additional surveys carried out as part of this proposal;
- The habitats and species present;
- The status of these habitats and species (e.g. whether priority species or habitat);
- The direct and indirect effects of the development upon those habitats and species;
- Full details of any mitigation or compensation that might be required.

The development should seek if possible to avoid adverse impact on sensitive areas for wildlife within the site, and if possible provide opportunities for overall wildlife gain.

The record centre for the relevant Local Authorities should be able to provide the relevant information on the location and type of priority habitat for the area under consideration.

## **2.6 Ancient Woodland**

The S41 list includes six priority woodland habitats, which will often be ancient woodland, with all ancient semi-natural woodland in the South East falling into one or more of the six types.

Information about ancient woodland can be found in Natural England's standing advice [http://www.naturalengland.org.uk/Images/standing-advice-ancient-woodland\\_tcm6-32633.pdf](http://www.naturalengland.org.uk/Images/standing-advice-ancient-woodland_tcm6-32633.pdf).

Ancient woodland is an irreplaceable resource of great importance for its wildlife, its history and the contribution it makes to our diverse landscapes. Local authorities have a vital role in ensuring its conservation, in particular through the planning system. The ES should have regard to the requirements under the NPPF (Para. 175)<sup>2</sup> which states:

*When determining planning applications, local planning authorities should apply the following principles:*

- a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts);*
- c) development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists.*

## 2.7 Biodiversity Net Gain

Biodiversity net gain is a key tool to help nature's recovery and is also fundamental to health and wellbeing as well as creating attractive and sustainable places to live and work in. The National Planning Policy Framework (NPPF) highlights the role of '*policies and decision making to minimise impacts and provide net gains for biodiversity*' (para 170)

Planning Practice Guidance describes net gain as an '*approach to development that leaves the natural environment in a measurably better state than it was beforehand*' and applies to both biodiversity net gain and wider environmental net gains. For biodiversity net gain, the [Biodiversity Metric 3.0](#), can be used to measure gains and losses to biodiversity resulting from development. Any action, as a result of development, that creates or enhances habitat features can be measured using the metric and as a result count towards biodiversity net gain.

The Chartered Institute of Ecology and Environmental Management, along with partners, has developed '[good practice principles](#)' for biodiversity net gain, which can assist in implementing net gains for biodiversity into development.

## 2.8 Contacts for Local Records

Natural England does not hold local information on local sites, local landscape character and local or national biodiversity priority habitats and species. We recommend that you seek further information from the appropriate bodies (which may include the local records centre, the local wildlife trust, local geoconservation group or other recording society and a local landscape characterisation document).

Thames Valley Environmental Records Centre (TVERC)  
[tverc@oxfordshire.gov.uk](mailto:tverc@oxfordshire.gov.uk)

Berks, Bucks and Oxon Wildlife Trust (BBOWT)  
<https://www.bbowt.org.uk/>

## 3. Designated Landscapes and Landscape Character

### 3.1 Landscape and visual impacts

Natural England would wish to see details of local landscape character areas mapped at a scale appropriate to the development site as well as any relevant management plans or strategies pertaining to the area. The EIA should include assessments of visual effects on the surrounding area and landscape together with any physical effects of the development, such as changes in topography.

The EIA should include a full assessment of the potential impacts of the development on local landscape character using [landscape assessment methodologies](#). We encourage the use of Landscape Character Assessment (LCA), based on the good practice guidelines produced jointly by the Landscape Institute and Institute of Environmental Assessment in 2013. LCA provides a sound basis for guiding, informing and understanding the ability of any location to accommodate change and to make positive proposals for conserving, enhancing or regenerating character, as detailed proposals are developed.

Natural England supports the publication *Guidelines for Landscape and Visual Impact Assessment*, produced by the Landscape Institute and the Institute of Environmental Assessment and Management in 2013 (3rd edition). The methodology set out is almost universally used for landscape and visual impact assessment.

In order to foster high quality development that respects, maintains, or enhances, local landscape character and distinctiveness, Natural England encourages all new development to consider the character and distinctiveness of the area, with the siting and design of the proposed development reflecting local design characteristics and, wherever possible, using local materials. The Environmental Impact Assessment process should detail the measures to be taken to ensure the building design will be of a high standard, as well as detail of layout alternatives together with



justification of the selected option in terms of landscape impact and benefit.

The assessment should also include the cumulative effect of the development with other relevant existing or proposed developments in the area. In this context Natural England advises that the cumulative impact assessment should include other proposals currently at Scoping stage. Due to the overlapping timescale of their progress through the planning system, cumulative impact of the proposed development with those proposals currently at Scoping stage would be likely to be a material consideration at the time of determination of the planning application.

The assessment should refer to the relevant [National Character Areas](#) which can be found on our website. Links for Landscape Character Assessment at a local level are also available on the same page.

### **3.2 Heritage Landscapes**

You should consider whether there is land in the area affected by the development which qualifies for conditional exemption from capital taxes on the grounds of outstanding scenic, scientific or historic interest. An up-to-date list may be obtained at [www.hmrc.gov.uk/heritage/lbsearch.htm](http://www.hmrc.gov.uk/heritage/lbsearch.htm).

## **4. Access and Recreation**

Natural England encourages any proposal to incorporate measures to help encourage people to access the countryside for quiet enjoyment. Measures such as reinstating existing footpaths together with the creation of new footpaths and bridleways are to be encouraged. Links to other green networks and, where appropriate, urban fringe areas should also be explored to help promote the creation of wider green infrastructure. Relevant aspects of local authority green infrastructure strategies should be incorporated where appropriate.

### **4.1 Rights of Way, Access land, Coastal access and National Trails**

The EIA should consider potential impacts on access land, public open land, rights of way and coastal access routes in the vicinity of the development. Consideration should also be given to the potential impacts on the adjacent/nearby [Click here to enter text](#). National Trail. The National Trails website [www.nationaltrail.co.uk](http://www.nationaltrail.co.uk) provides information including contact details for the National Trail Officer. Appropriate mitigation measures should be incorporated for any adverse impacts. We also recommend reference to the relevant Right of Way Improvement Plans (ROWIP) to identify public rights of way within or adjacent to the proposed site that should be maintained or enhanced.

## **5. Soil and Agricultural Land Quality**

Impacts from the development should be considered in light of the Government's policy for the protection of the best and most versatile (BMV) agricultural land as set out in paragraph 170 of the NPPF. We also recommend that soils should be considered in the context of the sustainable use of land and the ecosystem services they provide as a natural resource, as also highlighted in paragraph 170 of the NPPF.

Soil is a finite resource that fulfils many important functions and services (ecosystem services) for society, for example as a growing medium for food, timber and other crops, as a store for carbon and water, as a reservoir of biodiversity and as a buffer against pollution. It is therefore important that the soil resources are protected and used sustainably.

The applicant should consider the following issues as part of the Environmental Statement:

1. The degree to which soils are going to be disturbed/harmed as part of this development and whether 'best and most versatile' agricultural land is involved.

This may require a detailed survey if one is not already available. For further information on the availability of existing agricultural land classification (ALC) information see [www.magic.gov.uk](http://www.magic.gov.uk). Natural England Technical Information Note 049 - Agricultural Land Classification: protecting the best and most versatile agricultural land also contains useful background information.

2. If required, an agricultural land classification and soil survey of the land should be undertaken. This should normally be at a detailed level, eg one auger boring per hectare, (or more detailed for a small site) supported by pits dug in each main soil type to confirm the physical characteristics of the full depth of the soil resource, ie 1.2 metres.
3. The Environmental Statement should provide details of how any adverse impacts on soils can be minimised. Further guidance is contained in the Defra Construction Code of Practice for the Sustainable Use of Soil on Development Sites.

As identified in the NPPF new sites or extensions to new sites for peat extraction should not be granted permission by Local Planning Authorities or proposed in development.

## **6. Air Quality**

Air quality in the UK has improved over recent decades but air pollution remains a significant issue; for example over 97% of sensitive habitat area in England is predicted to exceed the critical loads for ecosystem protection from atmospheric nitrogen deposition ([England Biodiversity Strategy](#), Defra 2011). A priority action in the England Biodiversity Strategy is to reduce air pollution impacts on biodiversity. The planning system plays a key role in determining the location of developments which may give rise to pollution, either directly or from traffic generation, and hence planning decisions can have a significant impact on the quality of air, water and land. The assessment should take account of the risks of air pollution and how these can be managed or reduced. Further information on air pollution impacts and the sensitivity of different habitats/designated sites can be found on the Air Pollution Information System ([www.apis.ac.uk](http://www.apis.ac.uk)). Further information on air pollution modelling and assessment can be found on the Environment Agency website.

## **7. Climate Change Adaptation**

The [England Biodiversity Strategy](#) published by Defra establishes principles for the consideration of biodiversity and the effects of climate change. The ES should reflect these principles and identify how the development's effects on the natural environment will be influenced by climate change, and how ecological networks will be maintained. The NPPF requires that the planning system should contribute to the enhancement of the natural environment 'by establishing coherent ecological networks that are more resilient to current and future pressures' ([NPPF](#) Para 174), which should be demonstrated through the ES.

## **8. Contribution to local environmental initiatives and priorities**

Natural England advises that local initiatives are taken into consideration, these may include the following:

- Berkshire Local Nature Partnership (LNP) [The Natural Environment in Berkshire: Biodiversity Strategy 2014 – 2020](#)

## **9. Cumulative and in-combination effects**

A full consideration of the implications of the whole scheme should be included in the ES. All supporting infrastructure should be included within the assessment.

The ES should include an impact assessment to identify, describe and evaluate the effects that are likely to result from the project in combination with other projects and activities that are being, have been or will be carried out. The following types of projects should be included in such an assessment, (subject to available information):

- a. existing completed projects;
- b. approved but uncompleted projects;
- c. ongoing activities;
- d. plans or projects for which an application has been made and which are under consideration by the consenting authorities; and
- e. plans and projects which are reasonably foreseeable, i.e. projects for which an application has not yet been submitted, but which are likely to progress before completion of the

development and for which sufficient information is available to assess the likelihood of cumulative and in-combination effects.

Headquarters, Newsham Court, Pincents Kiln, Calcot, Reading, RG31 7SD

Email [sheikhs@rbfrs.co.uk](mailto:sheikhs@rbfrs.co.uk) | [www.rbfrs.co.uk](http://www.rbfrs.co.uk)

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The Planning Inspector  
Environmental Services.

Your Ref: EN010129-000012

Our Ref: SS/10112

[SloughMultifuelProject@planninginspectorate.gov.uk](mailto:SloughMultifuelProject@planninginspectorate.gov.uk)

Ask for: Mr. S. Sheikh

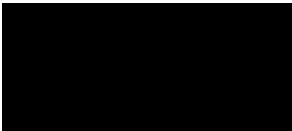
Date: 25 November 2021

Dear Sir,

**Re: Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) – Regulations 10 and 11.**

Further to your letter dated 19 November 2021 which you have forwarded with regards to the application by SSE Slough Multifuel Limited (the Applicant) for an order granting development consent for the Slough multifuel extension project (the Proposed Development). Royal Berkshire Fire and Rescue Service have no objections to the granting of permission and have no comments to make.

Yours faithfully



Mr S. Sheikh.  
Authorised Fire Safety Inspecting Officer  
And on behalf of the Royal Berkshire Fire and Rescue Authority

**ROYAL BERKSHIRE  
FIRE AND RESCUE SERVICE**  
Enabling people to lead safe and fulfilling lives



---

Trevor Ferguson • Chief Fire Officer



## **Proposed DCO Application by SSE Slough Multifuel Ltd for Slough Multifuel Project**

### **Royal Mail response to EIA Scoping Consultation**

Under section 35 of the Postal Services Act 2011, Royal Mail has been designated by Ofcom as a provider of the Universal Postal Service. Royal Mail is the only such provider in the United Kingdom. The Act provides that Ofcom's primary regulatory duty is to secure the provision of the Universal Postal Service. Ofcom discharges this duty by imposing regulatory conditions on Royal Mail, requiring it to provide the Universal Postal Service.

Royal Mail's performance of the Universal Service Provider obligations is in the public interest and should not be affected detrimentally by any statutorily authorised project. Accordingly, Royal Mail seeks to take all reasonable steps to protect its assets and operational interests from any potentially adverse impacts of proposed development.

Royal Mail and its advisor BNP Paribas Real Estate have reviewed the ES Scoping report dated November 2021.

Together with the main proposed Slough Multifuel CHP scheme (for which planning permission has been granted and is under construction), the proposed Slough Multifuel Extension scheme has been identified as having potential to affect Royal Mail operational interests due to the potential for construction phase traffic impact on the highway network.

However, due to insufficient information being available at this point in time Royal Mail is not able to provide a consultation response by which to adequately assess the level of risk to its operation and the available mitigations for any risk. Therefore, Royal Mail wishes to reserve its position to submit a consultation response/s at a later stage in the DCO consenting process and to submit representations to the Public Examination, if required.

In the meantime, any further consultation information on this infrastructure proposal and any questions of Royal Mail should be sent to:

**Holly Trotman** [REDACTED] **Senior Planning Lawyer, Royal Mail Group Limited**

**Daniel Parry Jones** [REDACTED] **Director, BNP Paribas Real Estate**

Please can you confirm receipt of this holding statement by Royal Mail.

End

**From:** [Guthrie James](#)  
**To:** [Slough Multifuel Project](#)  
**Cc:** [Jenny Seaman](#)  
**Subject:** Slough Multifuel Extension Project - EN010129-000012  
**Date:** 17 December 2021 12:33:33  
**Attachments:** [MyCouncil.png](#)

---

Dear PINS,

I wrote further to the Scoping Opinion in relation to an Environment Statement for the above proposed development. The Local Planning Authority has no comments to make at this stage.

Kind regards,

James Guthrie  
Senior Planning Officer  
Planning & Transport  
Slough Borough Council  
Observatory House  
25 Windsor Road  
Slough  
SL1 2EL



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[DataProtectionOfficer@slough.gov.uk](mailto:DataProtectionOfficer@slough.gov.uk)

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   @SloughCouncil

Email: [planning.consultations@surreycc.gov.uk](mailto:planning.consultations@surreycc.gov.uk)



Environmental Services  
Central Operations  
Temple Quay House  
2 The Square  
Bristol, BS1 6PN

Your Ref: EN010129-000012

**Environment, Transport &  
Infrastructure Directorate**  
Planning Group  
Surrey County Council  
Quadrant Court  
35 Guildford Road  
Woking  
GU22 7QQ

Emailed to: [SloughMultifuelProject@planninginspectorate.gov.uk](mailto:SloughMultifuelProject@planninginspectorate.gov.uk)

13 December 2021

Dear Mr Kent

**Planning Act 2008 (as amended) – and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) – Regulations 10 and 11**

**Application by SSE Slough Multifuel Limited (the Applicant) for an Order granting Development Consent for the Slough Multifuel Extension Project (the Proposed Development) – Scoping Consultation**

I refer to your letter dated 19 November 2021 concerning the above.

As requested, Surrey County Council would like to confirm that we have no comments to make regarding the Scoping Opinion for the proposed development.

Yours sincerely,

Steph Hamill

Minerals and Waste Planning Policy Team



**From:** [Devcon Team](#)  
**To:** [Slough Multifuel Project](#)  
**Subject:** Our DTS Ref: 42990 Your Ref: EN010129  
**Date:** 23 November 2021 13:26:37  
**Attachments:** [image001.png](#)  
[image002.png](#)

The Planning Inspectorate Temple Quay House Temple Quay Bristol BS1 6PN Our DTS Ref: 42990 Your Ref: EN010129  
23 November 2021

Dear Sir/Madam

**Re: SLOUGH HEAT & POWER STATION, EDINBURGH AVENUE, SLOUGH, SL1**

**Waste Comments**

**Water Comments**

Thank you for giving Thames Water the opportunity to comment on the above application. Thames Water are the statutory water and sewerage undertaker for the area and would like to make the following comments: The EIA Regulations 2017 set out in Schedule 4 that water and wastewater issues may need to be covered in an EIA. Thames Water considers the following issues should be considered and covered in either the EIA or planning application submission: 1. The developments demand for Sewage Treatment and network infrastructure both on and off site and can it be met. 2. The surface water drainage requirements and flood risk of the development both on and off site and can it be met. 3. The developments demand for water supply and network infrastructure both on and off site and can it be met. 4. Build – out/ phasing details to ensure infrastructure can be delivered ahead of occupation. 5. Any piling methodology and will it adversely affect neighbouring utility services. The developer can obtain information to support the EIA by visiting the Thames Water website <https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development>

Yours faithfully

Development Planning Department

Development Planning, Thames Water, Maple Lodge STW, Denham Way,  
Rickmansworth, WD3 9SQ

Kind Regards,

**Saira Irshad**

Developer Services - Planner

Maple Lodge STW, Denham Way, Rickmansworth, WD3 9SQ

Find us online at [developers.thameswater.co.uk](https://developers.thameswater.co.uk)



Visit us online [www.thameswater.co.uk](http://www.thameswater.co.uk) , follow us on twitter [www.twitter.com/thameswater](https://www.twitter.com/thameswater) or find us on [www.facebook.com/thameswater](https://www.facebook.com/thameswater). We're happy to help you 24/7.

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**From:** [Carr Richard](#)  
**To:** [Slough Multifuel Project](#)  
**Cc:** [Carr Richard](#)  
**Subject:** FW: EN010129 - Slough Multifuel Project - EIA Scoping Report Notification and Consultation  
**Date:** 09 December 2021 17:03:01  
**Attachments:** [EN010129 Slough Multifuel - Statutory consultation letter.pdf](#)

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Thank you for consulting Transport for London (TfL). I can confirm that we have no comments to make on the EIA scoping report

Best wishes  
Richard Carr

**Richard Carr | Principal Planner (Spatial Planning)**  
**TfL Planning, Transport for London**

A: 9<sup>th</sup> Floor, 5 Endeavour Square, E20, Westfield Avenue, E20 1JN

I work part time and so there may be a short delay in responding to emails

We have recently made changes to our pre-application service and charges, and introduced a new Initial Screening process. For more information please visit: <https://tfl.gov.uk/info-for/urban-planning-and-construction/planning-applications/pre-application-services>

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**From:** Spatial Planning [REDACTED]  
**Sent:** 19 November 2021 15:49  
**To:** Carr Richard [REDACTED]  
**Subject:** FW: EN010129 - Slough Multifuel Project - EIA Scoping Report Notification and Consultation



UK Health  
Security  
Agency

Environmental Hazards and Emergencies Department  
Seaton House, City Link  
London Road  
Nottingham, NG2 4LA

████████████████████  
████████████████████  
Your Ref: EN010129  
Our Ref: CIRIS 58497

Ms Katie Norris  
EIA Advisor  
The Planning Inspectorate  
Temple Quay House  
2 The Square  
Bristol, BS1 6PN

15<sup>th</sup> December 2021

Dear Ms Norris,

**Nationally Significant Infrastructure Project  
Slough Multifuel Project EN010129 - EIA Scoping Report Notification and Consultation  
Slough Heat and Power (SHP) Site at 342 Edinburgh Avenue, Slough, SL1 4TU**

Thank you for your consultation regarding the above development. The UK Health Security Agency (UKHSA) and the Office for Health Improvement and Disparities (OHID) (formerly Public Health England) welcome the opportunity to comment on your proposals and Environmental Impact Assessment (EIA) Scoping Report at this stage of the Nationally Significant Infrastructure Project (NSIP). Advice offered by UKHSA and OHID is impartial and independent.

The health of an individual or a population is the result of a complex interaction of a wide range of different determinants of health, from an individual's genetic make-up, to lifestyles and behaviours, and the communities, local economy, built and natural environments to global ecosystem trends. All developments will have some effect on the determinants of health, which in turn will influence the health and wellbeing of the general population, vulnerable groups and individual people. Although assessing impacts on health beyond direct effects from for example emissions to air or road traffic incidents is complex, there is a need to ensure a proportionate assessment focused on an application's significant effects.

Having considered the consultation documents, we wish to make the following specific comments and recommendations:

## **Impacts of emissions from the proposed development on the local population, environment, and air quality**

Whilst the applicant has stated that an update to the Human Health Risk Assessment is not proposed as part of this assessment, it has been stated by the applicant that the implementation of new technology, design changes and updated BAT, will result in a reduction of some pollutants from the site. Whilst we acknowledge this, we would recommend that the applicant submits updated emissions modelling to confirm that emissions from the proposed changes to the development will not have a detrimental effect on human health.

We would also recommend that the Human Health Risk Assessment (HHRA) is updated, considering the latest BAT-Associated Emission Levels (BAT-AELs) from the proposed development, for further reassurance that emissions of pollutant species have decreased since the original assessments were undertaken.

## **Health Improvement and Disparities (OHID)**

OHID notes that population and human health is to be scoped out given the existing local planning authority (LPA) approval and as such the existing approved development is being considered as baseline within the scoping report. If this approach is upheld by the Planning Inspectorate (PINS) we have no comment. Should there be any change in approach to baseline, then further scoping consultations should be undertaken.

UKHSA and OHID's predecessor organisation Public Health England produced an advice document *Advice on the content of Environmental Statements accompanying an application under the NSIP Regime*<sup>1</sup>, setting out the aspects to be addressed within the Environmental Statement<sup>1</sup>. This advice document and its recommendations are still valid and should be considered when preparing an ES.

We hope the information provided is useful and would welcome discussions to clarify any specific concerns or enquiries you may have.

Yours sincerely

On behalf of UK Health Security Agency  
[nsipconsultations@ukhsa.gov.uk](mailto:nsipconsultations@ukhsa.gov.uk)

*Please mark any correspondence for the attention of National Infrastructure Planning Administration.*

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<sup>1</sup>  
<https://khub.net/documents/135939561/390856715/Advice+on+the+content+of+environmental+statements+accompanying+an+application+under+the+Nationally+Significant+Infrastructure+Planning+Regime.pdf/a86b5521-46cc-98e4-4cad-f81a6c58f2e2?t=1615998516658>