

SLOUGH MULTIFUEL EXTENSION PROJECT

Planning Inspectorate Ref: EN010129

The Slough Multifuel Extension Order

Land at 342 Edinburgh Avenue, Slough Trading Estate, Slough

**Document Ref: 9.2 – Applicant’s Responses to the Examining
Authority’s First Written Questions (ExQ1)**

The Planning Act 2008



Applicant: SSE Slough Multifuel Limited

March 2023 – Deadline 2

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GLOSSARY

Abbreviation	Description
BEIS	Department for Business, Energy and Industrial Strategy
CIP	Copenhagen Infrastructure Partners
DCO	Development Consent Order
DESNZ	Department for Energy Security and Net Zero
EIA	Environmental Impact Assessment
ES	Environmental Statement
MW	Megawatts
NSIP	Nationally Significant Infrastructure Project
PA 2008	The Planning Act 2008
PINS	The Planning Inspectorate
RR	Relevant Representation
SMF	Slough Multifuel
SoCG	Statement of Common Ground
SoS	Secretary of State
TCPA	Town and Country Planning Act 1990

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1.0 INTRODUCTION

1.1 Overview

- 1.1.1 This document (Document Ref. 9.2) has been prepared on behalf of SSE Slough Multifuel Limited (the ‘Applicant’). It forms part of the application (the ‘Application’) for a Development Consent Order (a ‘DCO’), that was submitted to the Secretary of State (the ‘SoS’) for Business, Energy and Industrial Strategy (‘BEIS’) (now the SoS for the Department of Energy Security and Net Zero ‘DESNZ’), under Section 37 of ‘The Planning Act 2008’ (the ‘PA 2008’) on 30th September 2022. The Application was accepted for Examination by the Planning Inspectorate on 26th October 2022.
- 1.1.2 The Applicant is seeking development consent for the extension of the consented Slough Multifuel Facility (the ‘Consented Development’), an energy from waste electricity generating station, on land at the Slough Trading Estate, Slough (the ‘Site’).
- 1.1.3 A DCO is required for the extension (the ‘Proposed Project’) as it falls within the definitions and thresholds for a ‘Nationally Significant Infrastructure Project’ (a ‘NSIP’) under Sections 14(1)(a) and 15 of the PA 2008, being the extension of an onshore electricity generating station in England, which when extended will have a capacity of more than 50 megawatts (‘MW’).

1.2 The Purpose and Structure of this Document

- 1.2.1 The purpose of this document is to set out the Applicant’s responses to the Examining Authority’s (‘ExA’s’) First Written Questions (‘ExQ1’), which were issued on 28th February 2023.
- 1.2.2 The Applicants’ response to each Written Question is provided in Section 2.0 of the document. The ordering of the responses corresponds to the order in which the topics appear in the ExQ1 document published on the Planning Inspectorate’s web page.

2.0 APPLICANT’S RESPONSES TO EXQ1

ExQ1	Question to:	Question:	
General and Cross-topic Questions (including Environmental Statement)			Response
Q1.1.1	Applicant and the EA	Please provide information on any instances of non-compliance and/or difficulties with compliance with the existing Environmental Permit (EP).	There have not been any instances of non-compliance. All Pre-Operational Notices have been submitted as required by the Environmental Permit. No variations to the substance of the existing Environmental Permit are required to take account of the Proposed Project. The Environment Agency has requested that the EP is updated to reflect the 60MW cap (if authorised) and the Applicant has no objection to this.
Q1.1.2	The EA	The Applicant’s ‘Other Consents’ document [APP-020] states that there is no need to vary the existing EP for the facility as a result of the Proposed Development. Does the EA have any comments on this matter?	<p>The SoCG with the Environment Agency submitted at Deadline 2 (Application Document 8.2) addresses this point and states:</p> <p><i>“No substantial changes are required to the Environmental Permit (EP) for the Slough Multifuel Facility as a result of the Proposed Project. The Environmental Permit for the Consented Development is applicable to the Proposed Project and does not require amendment due to the Proposed Project, other than administrative changes. The administrative changes would be to update the total generating capacity of the operations from 50MW to circa 60MW where this has been included.</i></p> <p><i>The appropriateness and effectiveness of the reliance on controls in the existing Environmental Permit is adequate for the purpose of the Proposed Project.”</i></p>
Q1.1.3	SEGRO	Please expand on any concerns you have regarding the effect of the Proposed Development on the Slough Trading Estate and the businesses and people who work there [RR-004].	n/a
Development Consent Order			Response
Q1.2.1	Applicant and SBC	The case of Hillside Parks Ltd v Snowdonia National Park Authority [2022] UKSC 30 deals with the relationship between successive grants of planning permission for development on the same land and the effect of implementing one permission on another relating to the same site. Notwithstanding that judgement concerns planning permissions rather than a DCO, do the principles it establishes have any implications for the current proposal, particularly having regard to the terms of Art 8?	<p>As set out in the Planning Statement [APP-018], the existing generating station is consented pursuant to a number of planning permissions granted under the Town and Country Planning Act 1990 (the “Consented Development”). The DCO application seeks authorisation for an extension to the Consented Development to increase its gross installed generating capacity to up to 60MW, which involves the physical works described as “Work No.1” in the dDCO.</p> <p>These works are predominately located within the boiler house and turbine hall of the existing generating station. The only ‘external’ works will be a new single pipe run between these two buildings. This additional pipe will be 18 metres (‘m’) above ground and have a diameter of 273 millimetres (‘mm’) and a length of 20m. It will be located alongside other pipes of similar dimensions and on a pipe rack all of which form part of the existing generating station. There will only be limited visibility of the additional pipe from outside the site.</p> <p>The Order Limits of the DCO application have been drawn to include the full generating station as shown on the Works plan [APP-011], to ensure that the ancillary consent to</p>

ExQ1	Question to:	Question:	
			<p>operate at over 50MW sought as part of the DCO (which would otherwise be required under s36 of the Electricity Act 1989) applies to the whole generating station.</p> <p>The Supreme Court confirmed in Hillside that development rights under a planning permission cease to be available if it is “physically impossible” to develop under that permission due to the implementation of another permission on the same site. It should be noted that the court:</p> <ul style="list-style-type: none"> a) explained that it is only when it is physically impossible to develop a permission due to the implementation of another permission that development rights cease to be available. When considering what is “physically impossible”, the correct approach is to recognise that the test of physical impossibility applies to the context of the scheme as a whole; b) distinguished between the “physical impossibility” of carrying out the development authorised and a “mere inconsistency” between permissions. For example, conditions attached to a permission would be inconsistent with another permission on the site. If so, Pilkington would rule out further development of the first permission only if it were physically impossible to carry out it out; and c) ‘mere incompatibility’ between planning permissions (where there is no physical conflict), does not cause a problem and precise compliance with the earlier permission is not required. For physical impossibility to occur, there must be a material departure from the earlier planning permission. <p>Having considered the Proposed Project (also referred to as the “authorised development” in this document) against the Hillside decision the Applicant concludes that the Proposed Project is not caught by the Hillside decision for the following reasons:</p> <ul style="list-style-type: none"> a) As explained above, the works comprised in the Proposed Project are located within a relatively small self-contained area of the site and are additions to the works already being implemented under the TCPA permissions. The Proposed Project is not replacing or removing anything in the Consented Development but simply allowing for the installation of additional boiler air preheating systems, mechanical modifications to the actuated stream turbine inlet control valve to allow steam capacity to be increased and a new single pipe to run between two existing buildings. There is also no physical impossibility between the Proposed Project and the Consented Development in relation to electrical capacity because that is an operational rather than “physical” attribute of a scheme and in any event the extension has the effect of adding 10MW of capacity, so the development authorised by the TCPA permission remains a 49.9MW scheme with a 10MW extension. The Proposed Project will not render any of the Consented Development physically impossible to deliver; b) Not only is there no ‘physical incompatibility’ there is no inconsistency either between the Proposed Project and the Consented Development as the Proposed Project complements the Consented Development: to increase its capacity. The Applicant has ensured that there is complete consistency between Consented Development and the Proposed Project by proposing to construct the Proposed Project in

ExQ1	Question to:	Question:	
			<p>accordance with the controls and conditions which apply to the Consented Scheme, even replicating some conditions attached to the TCPA permissions and providing a supplemental deed to enable this; and</p> <p>c) The Proposed Project and the Consented Development are intended to be constructed at the same time, but even if the Consented Development is complete before the Proposed Project works are added, incompatibility does not arise as the extension works will be an addition to, rather than a replacement of any part of, Consented Development.</p>
<p>Q1.2.2</p>	<p>Applicant</p>	<p>Several references are made to provisions not giving rise to “any materially new or materially different environmental effects to those identified in the environmental statement.” In addition, Schedule 1, refers to Associated Development falling “within the scope of the works assessed in the environmental statement.”</p> <p>There is no mechanism for discharging Requirements in the DCO. Therefore, please clarify for each case, how and when would such an assessment be made, who would make it, who would be consulted, whose agreement would be required and who would approve it?</p>	<p>Background: The Two Main Categories of Requirements in the dDCO</p> <p>There are two main¹ “purposes” to the Requirements that the Applicant has proposed for inclusion in the dDCO, which can be categorised as follows:</p> <ul style="list-style-type: none"> (1) to secure <u>mitigation</u> identified through the Environmental Statement which is required as a result of the extension applied for (referred to in the dDCO as the “authorised development” and below as the Proposed Project) (see 3.35.1 of the EM [AS-006]); and (2) to provide clarity and <u>consistency</u> that every part of the extended generating station is subject to the same, uniform set of controls (see 3.35.2 of the EM [AS-006]). <p>Background: Requirements Securing Mitigation (Category 1) – Construction Environment Management Plan</p> <p>As outlined at paragraph 3.35.2 of the EM [AS-006] and in the Applicant’s response to the Planning Inspectorate’s s51 advice [AS-001], the only Requirement which is <i>necessary</i> in substance is the requirement to construct the Proposed Project in accordance with the approved construction environmental management plan (“CEMP”). This is secured by Requirements 3(b) and 4 (the CEMP being a certified document – see Article 11).</p> <p>The approved CEMP² which is controlling the ongoing construction of the existing generating station is appropriate to also control the construction of the Proposed Project without further amendment. This is confirmed by the relevant sections of the Environmental Statement including Ch.7 Transport and Access (see sections 7.7, 7.9, 7.10) [APP-6.2.7], Ch.8 Air Quality (paragraphs 8.7.2, 8.7.4, 8.9.2, 8.9.3) [APP-6.2.8], Ch.9 Noise (see paragraphs 9.7.2, 9.7.3, 9.9.1) [APP-6.2.9], Ch.10 Ecology (see paragraphs 10.7.2, 10.8.32) [APP-6.2.10] and Ch.11 Climate Change (see paragraphs 11.7.2, 11.10.1, 11.10.2) [APP-6.2.11]. It is considered that to require a new CEMP for the Proposed Project is unnecessary and could result in a position of inconsistency whereby the existing generating station and the Proposed Project could be required to comply with different measures. Given the likely construction programme and period for the construction of the Proposed Project (and the</p>

¹ In addition, Requirement 2 requires that the authorised development must commence within five years of the date on which the DCO comes into force.

² Approved by Slough Borough Council pursuant to condition 17 of the TCPA permission

ExQ1	Question to:	Question:	
			<p>nature of the Proposed Project), the Applicant considers that this would result in unnecessary confusion and practical difficulties. This could in turn create difficulties for Slough Borough Council as the enforcing body for both the conditions and Requirements.</p> <p>Background: Approach to Future Revisions of the CEMP</p> <p>As the CEMP applies generally to the ongoing construction of the existing generating station, it is possible and appropriate that the revisions to the CEMP may be approved by SBC pursuant to condition 17 of the TCPA permission. The effect of Requirement 3(b), in particular the inclusion of the wording “including any revisions approved,” is that any future revisions to the CEMP which are approved in accordance with condition 17 would apply equally to the CEMP for the Proposed Project. For reasons of consistency and clarity the Applicant considers it appropriate that the whole extended generating station is subject to same CEMP (the same approach is proposed for the other requirements which are in category (2) above – and see further the response to Question 1.2.6).</p> <p>However, as the CEMP comprises mitigation assumed to be in place in the environmental statement (i.e. it falls within category (1) above), the Applicant considers it appropriate to include Requirement 4 which ensures that any future revision to the CEMP pursuant to the TCPA permission does not affect or undermine the assessments in the environmental statement for the Proposed Project. To the extent that the amendments to the CEMP approved pursuant to the TCPA permission result in “any materially new or materially different environmental effects” to those identified in the environmental statement then the Applicant must continue to comply with the certified CEMP. The inclusion as a certified document in Article 11 of the version of the CEMP on which the environmental assessment was based ensures there is absolute clarity on the baseline against which any future updates to the CEMP should be considered. In light of the limited nature of the construction activities involved in the Proposed Project, it is considered that there is very little potential for this to occur in practice, but nonetheless the Applicant has included this ‘collar’ on the extent to which a revised CEMP should be complied with to ensure there is no potential, however theoretical, of unidentified environmental impacts arising.</p> <p>Limitations or ‘collars’ on new or materially different environmental effects</p> <p>The phrase “any materially new or materially different environmental effects” will be familiar to the ExA as it is standard practice to include this wording within the definition of “maintain”. It is usual for a DCO to allow an undertaker to maintain the authorised development (which includes the ability to remove, reconstruct or replace “provided that such works to not give rise to any materially new or materially different environmental effects to those identified in the environmental statement”). See paragraph 3.3.6 of the EM [AS-006] which details why this is appropriate and lists precedent for this approach. Further precedent includes The Thurrock Flexible Generation Plant Development Consent Order 2022 and The Wheelabrator Kemsley K3 Generating Station Order 2021. This approach is also consistent with Good Practice Point 2 in the Planning Inspectorate’s Advice Note Fifteen: Drafting Development Consent Orders: “Applicants should take care to ensure that the definition of maintain (if included in the draft DCO) does not seek to authorise activities which may</p>

ExQ1	Question to:	Question:	
			<p><i>generate significant effects beyond those assessed in relevant environmental information, notably the ES.”</i></p> <p>This wording is a limitation or ‘collar’ on the Proposed Project, ensuring that maintenance activities are not authorised to the extent they would give rise to new or material different environmental effects to those considered at the time development consent was granted. It is for the undertaker to determine whether materially new or materially different environmental effects arise. If new or materially different environmental effects do arise, then the undertaker is not authorised to rely on its DCO to undertake those works because they would fall outside of the definition of “maintain” (and undertaking such works could give rise to an enforcement risk). See also the definitions of “commence” and “enabling works” within the North London Heat and Power Generating Station Order 2017, for which a similar principle applies.</p> <p><i>The proposed dDCO drafting on new or materially different environmental effects</i></p> <p>The same principle would apply with regard to inclusion of this wording at Requirement 4 within the dDCO. The wording is a similar collar on the Proposed Project. The Proposed Project must be constructed in accordance with the certified CEMP or an updated version to the extent the updates do not result in new or materially different environmental effects to those identified in the environmental statement. Again, it is for the undertaker to determine whether materially new or materially different environmental effects would arise. If new or materially different environmental effects were to arise then the Applicant would not have complied with Requirement 4 giving rise to an enforcement risk under section 161 of the Planning Act 2008.</p> <p>The Applicant is aware that where DCOs include Requirements providing for the subsequent approval of plans or documents by the relevant planning authority, a mechanism is often included which specifies that approval must not be given by the relevant authority except where it has been demonstrated to the satisfaction of the relevant authority that the subject-matter of the approval sought does not give rise to any materially new or materially different environmental effects to those identified in the environmental statement (see for example Article 22(2) of the Thurrock Flexible Generation Plant Development Consent Order 2022). This is another example of a collar on the Proposed Project to ensure that the details subsequently approved do not result in new or materially different environmental effects to those identified in the environmental statement. It is noted that Requirement 4 operates in a slightly different way because it does not require discharge by Slough Borough Council – the existing generating station is already under construction and the CEMP is already approved. Any updates would be approved pursuant to condition 17 of the TCPA permission (and apply to the Proposed Project, subject to the limitation in Requirement 4). So it is appropriate that the collar in Requirement 4 applies directly to what may be carried out under the DCO (similar to the definition of “maintain”), rather than on the jurisdiction of the relevant planning authority to approve the CEMP.</p> <p>For these reasons, the drafting of Requirement 4 is considered to be appropriate in the particular circumstances of the Proposed Project. In the event that the ExA wishes to consider an alternative approach, then the Applicant can provide alternative drafting. Such alternative drafting would require that any revised iteration of the certified CEMP be</p>

ExQ1	Question to:	Question:	
			<p>approved pursuant to Requirement 4, so in effect a revised CEMP would need to be approved pursuant to both condition 17 of the TCPA permission and the Requirement 4. In that case it would be appropriate for the environmental collar described above to apply to the jurisdiction of SBC (in other words Requirement 4 would provide that revisions to the CEMP may only be approved by SBC to the extent that updates do not result in new or materially different environmental effects to those identified in the environmental statement). It would also be necessary to include an additional Schedule, or Part to a Schedule, to the dDCO setting out a process for approval of matters specified in requirements (as is standard in DCOs where requirements provide for such approvals). The Applicant has not put this forward in the first instance because it considers this approach to be unduly onerous for Slough Borough Council, as it would require them to undergo a discharge process for the same amendment under two separate regimes.</p> <p>Given the likely construction programme and period for the construction of the Proposed Project, the Applicant considers it unlikely that any revisions to the CEMP will be required in any event. With regard to the ExA’s comment that there is no mechanism for discharging Requirements in the DCO, this is correct and appropriate because none of the Requirements themselves require discharge (for the reasons outlined at paragraphs 3.33 - 3.37 of the EM [AS-006]). The Applicant is sufficiently confident that no revisions to the CEMP would be required giving rise to new or materially different environmental effects that the Applicant does not consider it necessary or proportionate to include a mechanism to approve a new CEMP in the dDCO (the Applicant accepts that in that unlikely event a change to the DCO would be required).</p> <p>The Relevant Planning Authority’s Position</p> <p>Slough Borough Council agrees with the Applicant’s proposed approach to the Requirements, as set out in the agreed SoCG dated March 2023, which will be submitted at this Deadline 2 (Application Document Ref. 8.1). See in particular agreed matter 3, which confirms agreement in relation to the overall approach to the requirements and the different categories 1 and 2 (emphasis added in relation to category 1, the subject of this question): <i>“It is appropriate for Requirements to be included in the draft proposed DCO in the form appended hereto at Annex 1. The Requirements: (1) secure that the Proposed Project is constructed in accordance with the Construction Environment Management Plan approved for the Consented Development, thereby securing the mitigation required for the Proposed Project as identified in the Environmental Statement... None of the Requirements themselves require discharge. <u>It is considered appropriate that SBC continue to discharge the conditions pursuant to the TCPA permission and further TCPA permission.</u> This avoids the need for SBC to undergo a discharge process for the same condition under two separate regimes.”</i></p> <p>Associated Development</p> <p>As the ExA notes, ‘Associated Development’ as described in Schedule 1 of the dDCO falls within the scope of the works assessed in the environmental statement. Paragraph 2.3.3 of Ch.2 The Proposed Project of the environmental statement [APP-6.2.1], which describes the project assessed for the purpose of the environmental statement, confirms that the Proposed</p>

ExQ1	Question to:	Question:	
			Project “also includes associated development...including temporary construction laydown areas, contractor facilities, vehicle parking and cycle storage facilities.”
Q1.2.3	Applicant	Art 2 This Art does not define the ‘relevant planning authority’ by name. Please explain why the relevant authority is not named or amend the Art to specify the name (see guidance at PINs Advice Note 15 paragraph 19.1).	The Applicant will update the definition of “relevant planning authority” at Article 2 of the dDCO and this will be reflected in the Applicant’s deadline 3 submission of the dDCO.
Q1.2.4	Applicant	<p>Art 4 authorises the operation of the extended generating station. The Applicant has accepted that the capacity of the generating station as constructed under Work No1 should be capped at up to 60MW.</p> <p>a) Why should the operation of the station not be similarly capped by using the same cap in Art 4(1) and the relevant parts of the Explanatory Memorandum (EM) [AS-006] (paras 2.16 to 2.19, 3.8 to 3.9). The EM [AS-006] refers to Art 6 of the North London Heat and Power Generating Station DCO and Art 7 of the Sizewell C DCO. However, neither of these articles refer to the capacity of the station.</p>	<p>Article 3 grants development consent for the “authorised development” which is described in Schedule 1. Work No. 1 is for an “extension to the Slough Multifuel combined heat and power generating station with the effect that, once extended, the extended generating station will have a gross installed generating capacity of up to 60MW” (emphasis added). As the ExA notes, this acts to cap the capacity of the generating station at 60MW. This is reiterated in the Applicant’s response to ExQ1 1.2.4(b) below.</p> <p>Section 36(1) of the Electricity Act 1989 provides that a generating station shall not be constructed or extended or operated except in accordance with a consent granted by the appropriate authority. However section 36(1) does not apply to a generating station in England whose capacity does not exceed 50MW³.</p> <p>The <u>purpose</u> of Article 4(1) of the dDCO is to provide the authorisation to operate a generating station at over 50MW which would otherwise be required by section 36(1) of the Electricity Act 1989 (see section 36(1B) which provides that so far as relating to the operation of a generating station, section 36(1) does not apply if the operation is authorised by an order granting development consent). The Applicant therefore considers it appropriate to follow, within Article 4(1), the language of section 36 (which refers to a 50MW threshold).</p> <p>The EM [AS-006] refers to Article 7 of the Sizewell C DCO. The ExA is correct in that this article does not refer to the capacity of the station. It states “<i>The undertaker is authorised to operate and use the authorised development for which development consent is granted by this Order</i>”. A cap on generating capacity is contained within the description of Work No. 1A of the definition of “Authorised Development” at Schedule 1 (which refers to a 3,340 MW generating station). The EM [AS-006] also refers to Article 6 of the North London Heat and Power Generating Station DCO which states “<i>The undertaker is authorised to operate the authorised development</i>”. Again, a cap on generating capacity is contained within the description of Works No. 1a of the definition of “Authorised Development” at Schedule 1 (which refers to a 70 MW generating station). Both were included in the EM as examples of Articles providing the ancillary consent to operate which is requested in this dDCO.</p> <p>The Applicant has deviated slightly from precedent drafting to include reference to the ability to operate “the extended generating station <u>at a capacity of over 50MW</u>”. The underlined text is not strictly necessary and is simply suggested for clarity in the particular circumstances of this dDCO because the ancillary consent to operate is only required if a</p>

³ S36(2) Electricity Act 1989

ExQ1	Question to:	Question:	
			<p>generating station operates at over 50MW and in this case the existing generating station has already been consented under the TCPA and could be operated outside of the Planning Act regime (albeit at a capacity of under 50MW in the scenario where it would not be extended). In the event that the ExA wishes to see alternative drafting the Applicant can provide drafting which removes the reference to the minimum capacity threshold from this article.</p> <p>The approach to specifying the minimum capacity for which the consent in question is required is starting to be adopted on recent DCOs for other electricity generating stations. For example Work No. 1 of The Hornsea Three Offshore Wind Farm Order 2020 refers to “an offshore wind turbine generating station with a gross electrical output of over 100 megawatts” – the purpose is to simply clarify that the consent in question is required (as DCOs are only required for offshore generating stations in England over 100MW) without imposing an overall cap on capacity.</p> <p>Other examples of made DCOs which do not include reference to capacity in the analogous article providing consent to operate are The Wheelabrator Kemsley K3 Generating Station Order 2021 (Article 5), the Abergelli Power Gas Fired Generating Station Order 2019 (Article 5), The Riverside Energy Park Order 2020 (Article 5), The Cleve Hill Solar Park Order 2020 (Article 28), and The Thurrock Flexible Generation Plant Development Consent Order 2022 (Article 6).</p> <p>The Applicant is not aware of any made DCOs which include a capacity cap within the analogous article providing consent to operate. The Applicant’s view is that to amend Article 4 in this manner would be out of step with the precedent of other made DCOs.</p>
		<p>b) If the operation of the station is not capped in the DCO what is the potential for it to operate at more than 60MW? Environmental Permit number EPR/KP3702MY [APP-085] gives the boiler capacity as 91.5MW. How does this figure relate to the 60MW used in the DCO?</p>	<p>As the ExA notes in part (a) of this ExQ1, the authorised development is capped at 60MW through the drafting of Work No. 1. The Applicant’s clear intention and the effect of the drafting is that the capacity of the extended generating station is capped at 60MW. There is no potential to operate at more than 60MW under the terms of the dDCO.</p> <p>The thermal capacity of a boiler relates to the maximum thermal power supplied by the fuel during continuous operation. The Slough Multifuel plant has 2 boilers each with a thermal capacity of 91.5MWt giving a total thermal capacity of 183MWt. Fuel with a total thermal power of 183MWt is fed into the boiler and through the process of combustion heat is released. This heat is absorbed by the boilers and used to raise high pressure steam. The steam is converted to rotational kinetic energy by means of a turbine which is used to drive a generator producing electricity. Losses occur at each stage of the process; the efficiency of the plant is the percentage of the total thermal input power which is converted to electrical output. The maximum gross electrical design capacity of the plant at 100% load with no CHP system in operation is 59.9MWe, this is the highest output possible of all operational load cases. The maximum installed generating capacity is therefore 59.9MWe which has been used to determine the 60MWe DCO application value.</p>
		<p>c) ES paragraph 2.5.2 [APP-027] states that there will ‘continue to be 20MW thermal energy available to</p>	<p>The maximum gross electrical design capacity of the plant at 100% load with no CHP system in operation is 59.9MWe. In a scenario where thermal energy is exported for use by consumers then there will be less thermal energy available for conversion to electrical</p>

ExQ1	Question to:	Question:	
		export.’ How does this figure relate to the 60MW capacity used in the DCO?	energy. The gross electrical design output of the plant will be 50.6MWe when thermal energy is exported at its maximum rate. There is not a 20MW difference between these numbers due to the efficiency of the conversion from thermal energy to electrical energy.
		d) Has any assessment been undertaken of the environmental implications if the generating station did operate at more than 60MW?	<p>There has been no assessment undertaken of the environmental implications if the generating station did operate at more than 60MW as the generating station will be controlled and restricted to prevent this eventuality. Therefore, a threshold above 60MW has not be assessed for the Proposed Project. The Applicant is not seeking consent for >60MW.</p> <p>The maximum gross electrical design capacity of the generating station at 100% load with no CHP system in operation is 59.9MWe, this is the highest output possible of all operational load cases. In normal operation thermal energy is exported to local consumers leading to a reduction in the gross electrical output.</p>
Q1.2.5	Applicant	<p>Art 10 provides a defence against statutory nuisance proceedings falling within section 79(1)g (noise emitted from premises so as to be prejudicial to health or a nuisance) of the Environmental Protection Act 1990. Having regard to the conclusions of the Statutory Nuisance Statement [APP-019] (for example paragraphs 4.1.1, 4.1.3 and 4.1.4) please clarify why a defence is sought for this matter and not others covered by S79(1).</p>	<p>The Statutory Nuisance Statement [APP-019] identifies whether the Proposed Project engages one or more of the statutory nuisances, set out in section 79(1) of the EPA, and if so, how the Applicant proposes to mitigate or limit such nuisances.</p> <p>Section 79(1) of the EPA (as it applies in England) provides that the following matters constitute statutory nuisances:</p> <ul style="list-style-type: none"> (a) any premises in such a state as to be prejudicial to health or a nuisance; (b) smoke emitted from premises so as to be prejudicial to health or a nuisance; (c) fumes or gases emitted from premises so as to be prejudicial to health or a nuisance; (d) any dust, steam, smell or other effluvia arising on industrial, trade or business premises and being prejudicial to health or a nuisance; (e) any accumulation or deposit which is prejudicial to health or a nuisance; (f) any animal kept in such a place or manner as to be prejudicial to health or a nuisance; (fa) any insects emanating from relevant industrial, trade or business premises and being prejudicial to health or a nuisance; (fb) artificial light emitted from premises so as to be prejudicial to health or a nuisance; (g) noise emitted from premises so as to be prejudicial to health or a nuisance; (ga) noise that is prejudicial to health or a nuisance and is emitted from or caused by a vehicle, machinery or equipment in a street or in Scotland, road;

ExQ1	Question to:	Question:	
			<p>(h) any other matter declared by any enactment to be a statutory nuisance.</p> <p>Section 3.0 of the Statutory Nuisance Statement considers these. The Statutory Nuisance Statement sets out the types of impacts associated with the Proposed Project that could potentially engage one or more of the matters set out in section 79(1) of the EPA and only section 79(1)g (noise emitted from premises so as to be prejudicial to health or a nuisance) is identified and a defence sought in respect of this nuisance.</p> <p>As set out in the Statutory Nuisance Statement, the Proposed Project has the potential to generate noise during construction and operation of the Proposed Project although the level of the construction and operational noise will not be different from that assessed for the Consented Development and considered in Chapter 9 of the [APP-6.2.9]. There will be no ‘additional’ noise over and above that for the Consented Development.</p> <p>The Applicant has not identified any material risk of statutory nuisance in relation to noise associated with the Proposed Project and therefore this Article is included for completeness. The Applicant would not have particular concerns if the Secretary of State was minded to remove this Article from the final DCO.</p>
<p>Q1.2.6</p>	<p>Applicant</p>	<p>Schedule 2 Requirement 4 refers to TCPA condition 17 and this is reproduced in Requirement 1 . Requirements 3, 5, 6, 7 and 8 also refer to conditions in the TCPA [APP-079] and further TCPA [APP-076] permissions. As these conditions are not reproduced in the DCO, applications under the Town and County Planning Act 1990 could be made to vary them and thereby alter the terms of the DCO without going through the process prescribed in the PA2008. Please explain why these conditions should not be reproduced in full in the DCO, perhaps in an additional schedule?</p>	<p>Background: Requirements Securing Consistency (Category 2)</p> <p>As set out in response to ExQ1 1.2.2, and in 3.35.1 and 3.35.2 of the EM [AS-006], there are two distinct purposes for inclusion of Requirements in the dDCO (category one being to secure <u>mitigation</u> and category two being to secure <u>consistency</u> of controls across the extended generating station). Requirements 3, 5, 6, 7 and 8 all fall into category 2. These Requirements secure that the Proposed Project must comply with the same conditions as the existing generating station. This is not because the conditions of the TCPA permission and further TCPA permission are required to mitigate the impacts or control the Proposed Project (that is the purpose of the category 1 Requirements). Instead, the purpose of the category 2 Requirements is to provide consistency between the existing generating station and the Proposed Project by ensuring that every part of the extended generating station is subject to the same, uniform set of controls (i.e. constructed and operated in the same way).</p> <p>This is considered to be necessary and appropriate in order to provide certainty and clarity (and consequently administrative ease) for SBC and the Applicant on an ongoing basis. The Applicant considers that ongoing consistency of the construction and operation of the extended generating station provided by its approach to Requirements is consistent with and satisfies section 120 of the Planning Act 2008 and Paragraph 15 of the Planning Inspectorate’s Advice Note Fifteen: Drafting Development Consent Orders (including that “Requirements should therefore be precise, enforceable, necessary, relevant to the development, relevant to planning and reasonable in all other respects.”).</p> <p>In order to achieve consistency between the existing generating station and the Proposed Project , the drafting of the dDCO Requirements provides that if the relevant planning conditions (or documents of plans approved pursuant to them) were to be varied, the Proposed Project should comply with the varied version and not (what would then be) an out</p>

ExQ1	Question to:	Question:	
			<p>of date version. The detail of how the drafting operates is set out in 3.35.3 of the EM [AS-006] and in the following paragraphs.</p> <p>Importantly, the substantive purpose of these terms of the dDCO (consistency) could not be changed other than through changes to the Requirements via the process prescribed in the PA2008. In other words, the purpose of the Requirements is to ensure that the same controls which govern the existing generating station extend to govern the Proposed Project , and this purpose could not be changed without changes to the drafting of the DCO.</p> <p>It is noted that in considering its approach, the Applicant has in mind that the particular circumstances of the Proposed Project are different to many other projects, in that the existing generating station is under construction and the necessary detailed plans and documents for that (substantial) part of the extended generating station have been prepared and approved already by the relevant planning authority.</p> <p><i>The proposed dDCO drafting</i></p> <p>The specific drafting in the dDCO which secures that the authorised development must comply with same controls as the existing generating station, even if these evolve over time, is provided as follows (see also 3.35.3 of the EM [AS-006]):</p> <ul style="list-style-type: none"> i. In relation to <u>conditions</u>, the definition of TCPA permission and further TCPA permission both include: “, <i>and any other variations thereto (which shall include for the avoidance of doubt any variations pursuant to Section 73 of the 1990 Act)</i>” ii. In relation to the <u>documents or plans</u> approved pursuant to conditions of the TCPA permission and further TCPA permission, Requirements 3(b), 7(b) and 7(c) provide: “, <i>including any revisions approved,</i>” <p>In relation to <u>conditions</u>, removal of the language identified in subparagraph (i) above in the definition of TCPA permission and further TCPA permission would have the effect of requiring that the Proposed Project comply with the relevant conditions of the TCPA permission and further TCPA permission as they appear in the versions certified in accordance with Article 11.⁴ For the reasons set out above, this is not considered appropriate or proportionate as it would require a change to the DCO in parallel with any future changes (even non-material variations) of the TCPA permission and further TCPA permission. If such changes to the DCO were not authorised or pursued, or simply took longer, it would less effectively achieve the purpose of these Requirements: ensuring consistency.</p> <p>In relation to <u>documents and plans</u>, if the ExA or the Secretary of State were minded to also require that the Proposed Project comply with the specific versions of the documents or plans currently approved under the relevant conditions of the TCPA permission and further TCPA permission, then the removal of the language identified in subparagraph (ii) above in</p>

⁴ The relevant conditions could be reproduced in a schedule although this is not considered necessary or efficient and given that DCOs commonly incorporate documents relevant to their effect, such as an environmental statement, through certification.

ExQ1	Question to:	Question:	
			<p>the Requirements together with adding the current approved documents and plans to the list of certified documents in Article 11 would have that effect. In that circumstance, the Applicant considers it would be necessary to provide additional drafting to allow SBC to approve amendments to the approved documents or plans pursuant to the DCO Requirements. It is common for DCOs to allow documents or plans to be submitted and approved by the relevant planning authority, albeit in this case these details would already have been approved so the DCO Requirements would only need to cater for further revisions. It would also be necessary to include an additional Schedule, or Part to a Schedule, to the dDCO setting out a process for approval of matters specified in requirements (as is standard in DCOs where requirements provide for such approvals).</p> <p>It is noted of course that SBC has full control over the conditions of the TCPA permission and further TCPA permission and the documents or plans approved pursuant to those conditions. Any variations or changes would need to be approved.</p> <p>It is also noted that:</p> <ul style="list-style-type: none"> i. the Applicant does not anticipate requiring to make changes to the conditions of the TCPA permission and further TCPA permission, or the documents or plans approved pursuant to them. Construction is continuing pursuant to those; and ii. other important controls in relation to the existing generation station are secured by the 106 agreement as varied (including controls related to HGV routing arrangements, operational traffic, limitations on HGV numbers, HGV engine standards, travel plan measures, and the requirement for a Construction Environment Management Plan), and the Applicant is proposing to secure that the Proposed Project must also be operated consistently with these obligations through a supplemental deed. The Applicant’s proposed approach is similar in practice for both existing planning conditions and existing 106 obligations. Section 106 agreements are often used to impose obligations on development authorised by a DCO and can be amended outside of the process prescribed by the PA2008. <p>Notwithstanding the Applicant’s position that the current approach to the Requirements and the dDCO drafting is appropriate, in the event that the ExA did wish to see alternative drafting the Applicant can provide a revised dDCO.</p> <p><i>The Relevant Planning Authority’s Position</i></p> <p>Slough Borough Council agrees with the Applicant’s proposed approach to the Requirements, as set out in the agreed SoCG dated March 2023 which will be submitted at this Deadline 2 (Document ref. 8.1). See in particular agreed matter 3 (emphasis added): <i>“It is appropriate for Requirements to be included in the draft proposed DCO <u>in the form appended hereto</u> at Annex 1.”</i></p>
Q1.2.7	Applicant	Please review whether each of the conditions identified in the Planning Conditions Tracker [APP-023] is included in all of the relevant Requirements for each phase of development. For example, should TCPA	The Applicant and Slough Borough Council have agreed that the appropriate conditions have been secured as Requirements, as set out in the agreed SoCG dated March 2023 which will be submitted at this Deadline 2 (Document ref. 8.1), and in particular agreed matter 3 (emphasis added): <i>“It is appropriate for Requirements to be included in the draft</i>

ExQ1	Question to:	Question:	
		permission condition 10 (which deals with surface water infiltration) be included in R3 for the construction phase?	<p><i>proposed DCO in the form appended hereto at Annex 1. The Requirements... (2) ensure that every part of the extended generating station will be subject to the same, uniform set of controls. <u>The category 2 Requirements are considered appropriate in order to provide certainty and clarity (and consequently administrative ease) for SBC and the Applicant on an ongoing basis. These Requirements are not required to secure mitigation required for the Proposed Project. The conditions of the TCPA permission and further TCPA permission identified in the Requirements are the appropriate conditions to secure the uniform construction, commissioning, operation and decommissioning of the extended generating station. No other conditions attached to the TCPA permission or further TCPA permission are considered necessary to be secured through the Requirements. No additional Requirements (beyond those which are set out at Appendix 1) are considered necessary.</u></i></p> <p>With regard to condition 10 (surface water drainage), compliance with this condition has been secured through Requirement 7(b) and the Applicant and Slough Borough Council consider this to be appropriate because drainage is an ongoing matter which requires management throughout the lifetime of the extended generating station. The Applicant does not consider it necessary to secure condition 10 for the construction phase because all drainage works have now been completed and the final drainage system is fully installed, and will not be affected by the Proposed Project. The construction of the Proposed Project does not generate any water that requires drainage.</p> <p>The Applicant can confirm it has reviewed each of the conditions identified in the Planning Conditions Tracker. Following this further review, the Applicant considers that condition 20 (noise levels) should be secured within Requirement 3(a) for the construction phase in addition to Requirement 7(a) for the operational phase, due to the reference in this condition to the installation of the Proposed Project. The Applicant will include condition 20 as part of Requirement 3(a) when it provides an updated draft of the DCO at deadline 3. It will also provide an updated version of the Planning Conditions Tracker [APP-023] at deadline 3 to reflect this.</p> <p>Aside from the comments regarding condition 20 above, the Applicant is content that all conditions with any relevance to the Proposed Project are correctly included in the draft Requirements (thereby providing consistency between the existing generating station and the Proposed Project by ensuring that every part of the extended generating station will be constructed and operated in the same way).</p> <p>Please also note the Applicant’s comment in its response to ExQ 1.2.2 in which a further explanation of the two different purposes for the Requirements is provided (category one being to secure mitigation and category two being to secure consistency of controls across the extended generating station). None of the conditions outlined in the Planning Conditions Tracker (including conditions 10 and 20) are <u>required</u> to secure mitigation identified through the Environmental Statement as a result of the authorised development, other than the CEMP. They have been included for the sake of consistency.</p>
Q1.2.8	Applicant and SBC	Having regard to clauses 9.8 and 9.9 of the S106 Agreement [APP-083], how would the S106 [APP-083	The DCO application is subject to a supplemental deed which will be submitted at this Deadline 2 (Application Document 9.3) which ensures that the Applicant and the Proposed Project are bound by the terms of the S106 Agreement [APP-083] as varied by the S106

ExQ1	Question to:	Question:	
		and APP-084] be enforceable against the implementation of the DCO?	<p>Deed of Variation [APP-084]. The supplemental deed will be entered into between SBC and the Applicant and applies the obligations contained in the S106 Agreement [APP-083] as amended by the S106 Deed of Variation [APP-084] to the Applicant and the Proposed Project. Both APP-083 and APP-084 will therefore continue to have effect as supplemented by the supplemental deed.</p> <p>The supplemental deed operates by requiring the Applicant to observe and perform the covenants, restrictions and obligations on the part of the “Developer” in respect of the “Development” as defined in the S106 Agreement (as varied) by treating the Proposed Project as if it is included in the definition of “Development” in the S106 Agreement (as varied). Therefore, the Proposed Project will be subject to and bound by the terms of the existing S106 Agreement (as varied). No variations are required to the substance of the S106 Agreement (as varied) as a result of the Proposed Project. As such, a supplemental deed is being proposed (as opposed to a deed of variation). However, the effect is the same in that the S106 Agreement (as varied) will be enforceable by SBC against the Applicant in respect of the Proposed Project.</p> <p>The approach to the supplemental deed has been agreed between the Applicant and SBC, and the parties are liaising to finalise the wording of the deed. Please see the agreed SoCG dated March 2023 which will be submitted at this Deadline 2 (Document ref. 8.1), and in particular agreed matter 4 which states: “<i>The Parties shall enter into a supplemental deed to the existing S106 Agreement (as varied) which relates to the Consented Development. This supplemental deed will operate to ensure that the Applicant and the Proposed Project are bound by the terms of and the obligations contained within the existing S106 Agreement (as varied) and that these are enforceable by SBC against the Applicant in respect of the Proposed Project.</i>”</p>
Q1.2.9	SBC	a) Is the Council satisfied that the Applicant’s Planning Conditions Tracker [APP-023] identifies all the relevant conditions from the certified permissions and that they are adequately transposed into the dDCO? b) Does the Council have any comments on the way in which the conditions in the TCPA and further TCPA permissions are transposed into the DCO?	n/a
Q1.2.10	Cadent Gas Limited	Please expand on your concern that protective provisions may be required to ensure that the Proposed Development does not impact in any adverse way on your statutory obligations [RR-002].	n/a
Q1.2.11	Applicant	Please provide copies of the red-line application plans for the TCPA and further TCPA permissions defined in the DCO.	The Applicant has provided the following additional plans to supplement the documents provided in Category 7 (Historic TCPA Permissions): <ul style="list-style-type: none"> • 7.3.1 – 2017 Slough Multifuel Planning Permission (P/00987/024) – Red Line Boundary Plan; • 7.4.1 – 2017 Further Development Planning Permission (P/00987/025) – Red Line Boundary Plan;

ExQ1	Question to:	Question:	
			<ul style="list-style-type: none"> • 7.9.1 - 2022 Gatehouse, Silo Frame and Enclosure Planning Permission (P/00987/052) – Red Line Boundary Plan; and • 7.10.1 – 2022 Greenock Road Fence Permission – Red Line Boundary Plan. <p>The Applicant also submits the following documents into Category 7 which have been granted planning permission by Slough Borough Council since the DCO application was submitted:</p> <ul style="list-style-type: none"> • 7.14 – Cooling Tower 8 and Associated Infrastructure Planning Permission (P/20018/000) • 7.14.1 – Cooling Tower 8 and Associated Infrastructure Red Line Boundary Plan <p>An updated Application Guide (Document Ref. 1.2) has been submitted at Deadline 2 which captures the above elements.</p>
Q1.2.12	Applicant	Please review the DCO and EM and update the references to the Department for Energy Security and Net Zero (subject to confirmation).	The Applicant will address in its Deadline 3 submission of its updated dDCO and EM.
Air Quality and Emissions			
Q1.3.1	Applicant	Paragraphs 2.5.1 to 2.5.3 of ES Chapter 2: The Proposed Project [APP-027] and paragraph 8.1.5 of ES Chapter 8: Air Quality [APP-033], outline how the Proposed Development seeks to increase the generating capacity of the consented scheme. Please clarify the point at which (within the Energy from Waste process) the efficiencies and increased gross electricity generation capacity would be delivered by ‘interventions’ as part of the Proposed Development. For the ExA to better understand these points, the Applicant is requested to provide a process flow(s)/schematic block diagram(s) showing the Energy from Waste process which clearly identifies these interventions. In responding please have particular regard to the combustion element in demonstrating the assertions that “The Proposed Project does not introduce any new emissions nor change the exhaust gas parameters” (paragraph 8.8.16 of [APP-033]) and that the pre-heating of combustion air would be achieved without the use of additional fuel [APP-027, paragraph 2.5.1].	Further to the answer supplied in Q1.2.4 part b, the Consented Development includes 2 boilers with a total thermal capacity of 183MWt. The Proposed Project makes no changes to the boilers supplied for the consented development, their fuel consumption, or emissions. The intervention from the Proposed Project occurs where low pressure steam is extracted from the steam turbine and fed to air heat exchangers. The steam fed to the air heat exchangers increases the temperature of the combustion air being fed into the boilers which allows more steam to be produced for the same amount of fuel. The Proposed Project recovers energy which would otherwise have been wasted in the process. Please refer to the Slough Multifuel Process Diagram and Slough Multifuel Process Overview contained in Appendix 1 of this document.
Q1.3.2	Applicant and the EA	The ES advises that the emission limit values in EPs for waste incineration are expected to be revised	a) The Variation to the EP has not yet been received for the Slough MF plant. However, the process has commenced with a set of standard questions issued by the EA on

ExQ1	Question to:	Question:	
		nationally in late 2022/early 2023 [APP-033, paragraphs 8.1.4 ad 8.3.3]. a) Has this occurred yet? If not, please advise on when it is likely to happen. b) Please comment on the capacity of the consented scheme and the Proposed Development to comply with the reduced limit values. c) If the limit values are reduced, what effect would this have on the absolute emission levels of the Proposed Development (with reference to EN-3, paragraph 5.2.7)?	29th November 2022 and the response issued back to the EA on 7th February 2023. A draft Variation Notice is now expected in the next few months. b) The Proposed Project is able to comply with the more stringent limit values and the Variation to the EP is being progressed on that basis. c) The assessment scenarios have already taken into account the more stringent limit values, which reflects the worst-case scenario [APP-033, paragraph 8.3.3]. This aligns with EN-3 (noting that there is no paragraph number 5.2.7 in EN-3).
Q1.3.3	Applicant	The ES [APP-033, paragraph 8.4.8] advises that two types of fuel with different calorific values (12MJ/kg and 10.5MJ/kg) have been assessed. Please expand on the implications of using fuel of a lower calorific value for the amount of fuel used and the energy output achieved.	A lower calorific value fuel would generate less energy per unit of fuel. To offset this, the rate at which fuel is added to the combustion chamber can be varied. This mainly affects the economic modelling of the Proposed Project. It does not influence any assessments which are based on the ‘worst case’ CV value for each topic; the air quality assessment for example is based on the maximum allowed emissions under the revised limit values (noted in Paragraphs 8.4.42, 8.6.15 and 8.7.5 of Chapter 8 Air Quality of the ES [APP-033]).
Q1.3.4	Applicant	The ES advises that the construction phase assessment considers emissions from activities and plant on site [APP-033, paragraph 8.4.7], although paragraph 8.4.10 defines a study area that includes off-site construction phase traffic and the Assessment of Likely Impacts and Effects (section 8.8) does not refer specifically to off-site construction traffic. Please clarify what air quality assessment has been made of the impact of off-site construction traffic.	The Applicant and PINS agreed to scope out construction phase traffic emissions on local air quality (see paragraph 3.2.2 of the Scoping Opinion [APP-060]). The risk of track out of dusty material by construction traffic onto off-site roads has been considered and is listed in Table 8.18 [APP-033]. The size of the study area for construction impacts from dust and non-mobile machinery is described in Paragraph 8.4.10 [APP-033] and comprises up to 500m from the site entrances, 350m from the site boundary and 50m from the construction traffic route for human receptors, reducing to up to 50m for ecological receptors.
Q1.3.5	Applicant	Please expand on the significance of future baseline Air Quality Assessment Levels being exceeded for PAH's B[a]P, Arsenic (As), Chromium VI (Cr(VI)) [APP-033, Table 8.16 and paragraph 8.6.20]	The risk assessment approach used by the Environment Agency is conservative in nature and is mindful of known limitations in the data available to be used to represent background contributions to of air pollutants such B[a]P, Cr(VI) and As. These limitations include a shortage of national monitoring network locations that are representative metal and B[a]P concentrations at land away from major industrial facilities. In the application process leading to the granting an environmental permit for the operation of the Consented Development (the future baseline scenario) it was demonstrated that the contribution of emissions of B[a]P, As and Cr(VI) would not represent a significant risk to health.
Q1.3.6	Applicant	How would the order control measures set out in ES paragraphs 8.6.23 to 8.6.26 [APP-033] be secured through the DCO?	The Applicant believes that the ExA refers in this ExQ1 to “odour” control measures and has addressed this question accordingly.

ExQ1	Question to:	Question:	
			<p>The Proposed Project itself does not introduce any new sources of odour. Notwithstanding this, for consistency across the whole extended generating station the Proposed Project must be operated in accordance with the Odour Management Plan (dated November 2019) pursuant to Requirement 7(b). The Odour Management Plan was approved by the local planning authority on 12 March 2020 with reference P/00987/036 pursuant to condition 13 of the TCPA permission. The good housekeeping measures that are referred to in the ES at paragraphs 8.6.23 to 8.2.26 are included in the existing Odour Management Plan.</p>
<p>Q1.3.7</p>	<p>Applicant</p>	<p>Please clarify where in the DCO and/or CEMP the mitigation measures set out in ES paragraph 8.7.3 [APP-033] would be secured.</p>	<p>Paragraph 8.7.3 of the Environmental Statement [APP-033] outlines that good practice industry measures are in place pursuant to the CEMP approved pursuant to the TCPA permission. The appropriate embedded measures which will be implemented during construction and which are identified in this paragraph are noted below alongside the relevant section of the CEMP:</p> <ul style="list-style-type: none"> a) Where appropriate, storage of sand and aggregates in bunded areas and storage of cement powder and fine materials in silos – see Table 5 of the CEMP, however, note that this is not applicable to the Proposed Project because there will be no need to store sand, aggregates, cement power or fine materials; b) Use of water suppression and regular cleaning to minimise mud on roads – see Table 5 of the CEMP, paragraph 7.5 and 8.4 of Appendix 1 of the CEMP, and paragraph 3.3 of Appendix 4 of the CEMP; c) Covering vehicles leaving the construction site that are carrying construction waste minerals or spoil - see paragraph 7.5 of Appendix 1 of the CEMP, paragraph 9 of Appendix 2 of the CEMP, and paragraph 3.3 of Appendix 4 of the CEMP; d) Employment of wheel wash systems at site exits – see Table 5 of the CEMP, and paragraph 7.5 of Appendix 1 of the CEMP; and e) Restriction where practicable of the use of unmade road access - this is not applicable in the context of the authorised development because all access roads have already been constructed. <p>The Proposed Project’s compliance with the CEMP is secured through Requirements 3(b) and 4.</p>
<p>Q1.3.8</p>	<p>Applicant</p>	<p>ES paragraph 8.8.13 [APP-033] advises that construction dust and particulate impact on ecology is assessed as not applicable because there are no receptors within 50m [APP-064, Appendix 8A paragraph 8.4.8]. Please expand on the justification for the use of this distance.</p>	<p>The distance of 50m is cited in Institute of Air Quality Management’s (IAQM) Guidance on the assessment of dust from demolition and construction, version 1.1, within Box 1: Screening Criteria. The distance is a custom and practice value that takes account of the exponential decline in both airborne concentrations and the rate of deposition with distance, as well as the practical experience of the members of the IAQM Working Group that prepared the guidance.</p>

ExQ1	Question to:	Question:	
Biodiversity (including Habitat Regulations Assessment)			Response
Q1.4.1	Applicant	Under the heading of ‘Baseline Conditions’, ES paragraph 10.6.6 [APP-035] states that the designated sites in Table 10.5 would not be impacted during the construction, operation or decommissioning phases of the Proposed Development. Please expand on the justification for this finding.	<p>There will be no significant impacts on designated sites due to distances from the Site (the closest is 0.9km from the Site), the lack of any pathways and the nature of the Proposed Project (i.e., non-residential). These judgments are explained in paragraphs 10.8.3 to 10.8.7 (dealing with construction and demolition) and 10.8.19 to 10.8.25 (dealing with operation) of the ES [APP-035].</p> <p>A justification of no significant impacts on nearby Special Areas of Conservation (SACs) and Ramsar sites is detailed in the <i>No Significant Effects Report to inform the Habitats Regulations Assessment</i> (Appendix 10B) [APP-067]. It concluded that the Proposed Project (even using the worst-case 10.5MJ/kg emissions) will not result in a likely significant air pollution effect on any modelled designated sites either alone or in combination with other projects and plans.</p> <p>Taking into consideration the implementation of mitigation measures described in the ES, there are no significant residual ecological effects as a result of the Proposed Project during construction, operation or decommissioning (see paragraph 10.9 of the ES, Chapter 10 Ecology [APP-035]).</p> <p>Table 10.5 [APP-035] lists twenty-four statutory designated sites within 5km for national designations and 15km for international designations. The nearest designated site is c 900m from the Site. Table 10.6 [APP-035] lists 5 non-statutory sites within 2km of the Site, with the nearest being 800m from the Site. Paragraphs 10.8.4 – 10.8.7 [APP-035] explain that due to the nature and small scale of the Proposed Project, construction and decommissioning impacts on ecology are highly localised, and limited to 100m from the Site.</p> <p>Construction traffic associated with the Proposed Project comprises 20 staff movements over 2 months which equates to 1-2 shuttle buses to Site and an average 1 additional HGV arrival per day [APP-032]. As the construction of the Proposed Project is anticipated to occur after the peak construction period of the Consented Development, there will not be an increase in the maximum number of minibuses travelling to the Site. In terms of the associated air quality impacts on ecology, construction and decommissioning traffic exhaust emissions have therefore been scoped out of the air quality assessment as clearly not significant [APP-033]. Dust and non-mobile machinery emissions is identified as Low Risk in Table 8.17 of the ES [APP-033] and not significant. Chapter 9 Noise and Vibration [APP-034] demonstrates that construction noise is below the Lowest Observable Adverse Effect Level (LOAEL) and not significant at nearby sensitive receptors and a worst-case increase in noise of +0.8 dB is predicted due to construction traffic on Buckingham Avenue East during the peak period, which is negligible and not significant. All new noise generating plant in the Proposed Project will be located internally and will not produce any additional noise than assessed in the Consented Development. Additionally, all new plant will be required to comply with the noise limit of 60dB LAeq,T at the site boundary as set out in the environmental permit. As such, noise emissions will be consistent with the Consented Development, which was identified as Negligible and not significant. This is equivalent to a noise effect that is below the LOAEL.</p>

ExQ1	Question to:	Question:	
			The only pathway is via atmospheric emissions during operation, which is considered in Appendix 10B No Significant Effects Report [APP-067] and summarised in Paragraph 10.8.20 of the ecology assessment [APP-035], which explains that the effect is negligible and therefore is no effect (no change in emissions) associated with the Proposed Project.
Q1.4.2	Applicant	Please clarify how the biosecurity measures to prevent the spread of non-native invasive species would be secured in the DCO [APP-035, paragraphs 10.8.15 and 10.8.16].	As noted in paragraph 10.8.14 [APP-035], the location where non-native invasive species exists onsite is subject to landscape works only as part of the existing Consented Development. It is not disturbed as part of the Proposed Project. The biosecurity measures are therefore addressed by the existing CEMP, which does not need to be changed for the Proposed Project.
Climate Change			Response
Q1.5.1	Applicant	ES paragraph 2.5.3 [APP-027] advises that Cooling Tower 8 would no longer be used by other energy generating activities. Having regard to the value placed on combined heat and power systems by NPS-EN3, what are the consequences of this change for the Slough CHP system?	There is no consequence on the SHP CHP system of dedicating Cooling Tower (CT) 8 to the Slough Multifuel Facility. The remaining CHP generator (turbine 17) in the Slough CHP system – which is not part of the Slough Multifuel Facility - operates using its own dedicated air cooled condenser. CT 7 remains in service and is paired with SHP’s other remaining steam turbine (Turbine 16). Slough Multifuel will provide a new source of steam to the SHP heat network which will make the supply more robust in the future.
Q1.5.2	Applicant	ES paragraph 2.5.3 [APP-027] also advises the Cooling Tower is proposed to be refurbished. a) What is the extent of this work? b) Are planning or other permissions required? If so, have they been sought?	The CT requires two phases of refurbishment. The first was the extensive refurbishment of the concrete shell originally built in the 1960s and then extensively refurbished to ensure its longevity for the Slough MF generator. CT8 has undergone refurbishment before in 1990 and 2010 and such works to an existing operational asset did not require further planning. Repainting of the CTs was required by the S106 Agreement (as varied), in paragraph 10 of Schedule 1 [APP-7.11]. The external paint colour required to protect the concrete was approved by Slough BC as required by the s106 Agreement. The second phase was to install the required cooling tower pumps, packing inside the concrete shell and associated pipework. Planning permission was secured from Slough Borough Council (Ref. P/20018/000) for the new access platforms and the e-house container required for the pumps’ power supply and visible from Edinburgh Avenue (Document Ref. 7.14). The pipework is predominantly the old cooling water pipework that has been refurbished and is mainly underground. No further planning permissions or other consents are required. All necessary permissions and consents are already in place.
Q1.5.3	Applicant	Draft EN1 section 4.7 encourages the use of combined heat and power systems. How would the Proposed Development support this aim?	The Proposed Project will be connected to the SHP heat network and will provide a new source of steam which will make the supply more robust in the future and is expected to reduce the need to use a small gas boiler which is currently the only available back-up. Increasing the gross electrical generation has no impact on the 20MWth of steam available to this network.
Q1.5.4	Applicant	ES Table 11.1 [APP-036] identifies potential sources of GHG emissions. Not all of these sources are assessed in section 11.8. For example, in the construction	Accurate data was available for the other potential sources listed in Table 11.1 and therefore only product, transport of materials to and from site and transport of workers have been assessed. Due to the nature, scale, and context of the Proposed Project, it is reasonably

ExQ1	Question to:	Question:	
		phase - electric use, treatment of water, treatment of waste; in the operation phase - none of the identified potential sources. Please clarify what has been assessed.	assumed that the emissions from these other sources will be negligible and therefore not material to the overall carbon footprint. It is not considered that the absence of these other potential sources of GHG emissions affects the conclusions of the assessment.
Q1.5.5	Applicant	ES paragraph 11.8.4 [APP-036] refers to a qualitative approach to the assessment of climate change resilience, but it is not clear where this assessment is made. Please clarify the position.	Paragraph 11.8.4 [APP-036] is intended to confirm that there are no anticipated issues related to climate change resilience associated with the Proposed Project and an assessment is therefore not required.
Q1.5.6	Applicant	ES Table 11.14 [APP-036] sets out the contribution of the Proposed Development to the UK National Carbon Budgets, including a figure of 0.00001252% in the 4th budget period. Please clarify the basis of this figure.	The figure referred to in Table 11.14 is not a percentage, but its mass. The unit is MtCO _{2e} . The figure is the overall total of emissions for the Proposed Project for that budget period.
Q1.5.7	Applicant	ES paragraph 11.9.2 and Table 11.15 [APP-036] refer to the beneficial impact of the Proposed Development based on the facility being more efficient. Even if that is the case, please expand on how it amounts to a benefit in terms of GHG emissions.	<p>The Proposed Project is anticipated to increase the amount of electricity generated from the equivalent tonnage of waste derived fuel (WDF) compared with the Consented Development. There will be no change in overall emissions from combustion of the WDF relative to the Consented Development.</p> <p>Ultimately, the Proposed Project would allow more electrical energy to be produced for the same fuel and same GHG emissions.</p>
Noise and Vibration			Response
Q1.6.1	Applicant	Read together, ES paragraphs 9.4.11 and 9.4.12 [APP-034] appear to indicate that noise at the Lowest Observed Adverse Effect Level would not be experienced at a distance of 500m or more from the site. Is that correct? How was the 500m distance determined?	<p>Noise levels below the Lowest Observed Adverse Effect Level (LOAEL) is described in Planning Practice Guidance Noise as: “<i>Noise can be heard, but does not cause any change in behaviour, attitude or other physiological response</i>”. Consequently, noise may be perceivable at receptors outside the study area but would not constitute an effect on health and quality of life.</p> <p>The study area for operational noise was set at 500m based on previous experience of assessing the Consented Development and accounting for the urban location of the site and sensitive receptors. Although a study area of 500m was set for operational noise, the same sensitive receptors considered in the application for the Consented Development were assessed which included receptors up to 600m away. These receptors are listed in Table 9.2 of the noise and vibration assessment [APP-034].</p> <p>Table 9.9 shows that construction noise is below the Lowest Observed Adverse Effect Level at all the sensitive receptors. Operational noise is noted in Paragraph 9.8.9 as: “<i>All new noise generating plant in the Proposed Project will be located internally and will not produce any additional noise than assessed in the Consented Development. Additionally, all new plant will be required to comply with the noise limit of 60dB LAeq,T at the site boundary as set out in the environmental permit. As such, noise emissions will be consistent with the Consented Development, which was identified as Negligible and not significant. This is equivalent to a noise effect that is below the LOAEL.</i>”</p>

ExQ1	Question to:	Question:	
			<p>The LOAEL is therefore met at receptors as close as 180m (R2 at Bodmin Avenue). There are no closer sensitive receptors</p>
<p>Q1.6.2</p>	<p>Applicant</p>	<p>ES paragraph 9.4.16 and Table 9.2 [APP-034] set out baseline noise monitoring locations. They all appear to be residential locations. Please comment on the potential for noise sensitive uses closer to the site, for example, office or other commercial uses on the Slough Trading Estate.</p>	<p>The Slough Trading Estate is approximately 2.5 km² and consists of a range of commercial and industrial uses many of which depend on other tenants on the Estate. It has evolved over 100 years but always with a power station present at the site so any developments around the Estate have always taken into account a range of noise sources, including the power generation uses, power station and the steam network. It should be noted that there are at least 30 other generators on the Estate servicing Data Centres and a number of Distribution Warehouses that means HGV movements around the Estate are normal. Due to this high level of business activity it is only really at night that noise can be sensitive hence the focus on the nearby residential dwellings.</p> <p>Baseline noise monitoring has been undertaken using the locations submitted in the ES for the Consented Development for consistency. These locations are residential, which is in line with requirement of BS 4142, which is used to assess the “...likely effects of sound on people who might be inside or outside a dwelling or premises used for residential purposes upon which sound is incident”.</p> <p>For non-residential receptors, noise criteria would be set based on design criteria for each specific type of non-residential receptor. Offices require more onerous noise criteria than commercial buildings so non-residential criterion has been set based on design criteria for offices.</p> <p>The assessment criteria for offices has been informed by guidance from British Standard 8233:2014, which recommends that indoor noise levels should not normally exceed 35-40 dB LAeq,T for work requiring concentration in executive offices. The upper value of this range is then converted to an outdoor free-field assessment criterion of 68 dB LAeq,16h, which assumes single glazing is the weakest point of the building façade. There is no night-time criterion as these buildings are not expected to be regularly occupied at night.</p> <p>The highest predicted noise level at the Edinburgh Avenue site boundary is below the non-residential assessment criterion. Consequently, no non-residential building in the Slough Trading Estate will be adversely affected by operational noise.</p>
<p>Traffic and Transport</p>			<p>Response</p>
<p>Q1.7.1</p>	<p>Applicant and SBC</p>	<p>Clause 9.9 of the S106 Agreement [APP-083] says that it does not prohibit or limit the right to develop the Land in accordance with a planning permission granted after the date of the Agreement. By extension, this would also appear to apply to the Deed of Variation [APP-084].</p> <p>a) Given that the transport assessment relies on the S106 as varied to cap the number of HGV movements [ES paragraph 7.8.5, APP-032]), what</p>	<p>See response to Q1.2.8 above. The Proposed Project is bound by the S106 Agreement [APP- 083] as varied [APP-084] pursuant to the supplemental deed.</p>

ExQ1	Question to:	Question:	
		reliance can be placed on the S106 to bind the Proposed Development to that cap?	
		b) ES paragraph 7.7.3 [APP-032] states that the s106 requirements for an operational Travel Plan for the consented development would apply equally to the Proposed Project. Please explain how this would work in the light of the comment above regarding the reliance that can be placed in the S106 to bind the Proposed Development.	See response to Q1.2.8 above. The Proposed Project is bound by the S106 Agreement [APP- 083] as varied [APP-084] pursuant to the supplemental deed.
Q1.7.2	Applicant and SBC	ES paragraphs 7.2.11 to 7.2.13 [APP-032] identify development plan documents, but do not identify any relevant policies within those documents. Please comment on whether there are any development plan policies relevant to the transport topic area.	<p>There has been no change to planning policy for transport in Slough since the Consented Development received planning permission. An Emerging Local Plan is currently in preparation by Slough Borough Council, from which a Proposed Spatial Strategy underwent Regulation 18 Consultation in January 2021.</p> <p>Transport policy documents, and where possible particular policies are listed as follows:</p> <p>Slough Core Strategy Development Plan Document (2006 – 2026)</p> <ul style="list-style-type: none"> • Core Policy 7 (Transport) <p>Slough Local Transport Plan 3 (2011 – 2026)</p> <p>Saved Local Plan Policies (2010)</p> <ul style="list-style-type: none"> • Policy T2 – Parking restrictions • Policy T8 – Cycling Network and Facilities <p>There is no change to the transport arrangements associated with the Proposed Project, including cycling and parking provision, therefore the above policy is of limited relevance.</p>
Q1.7.3	Applicant	ES paragraph 7.6.1 [APP-032] states that the future baseline for the assessment is when the consented development is built and in operation. However, it is proposed to construct the Proposed Development in parallel with the consented development. What implications does this have for the assessment of construction phase traffic impacts?	<p>The Proposed Project may be built in parallel with the construction of the Consented Development or once the Consented Development is built, with an expectation for the former. It is noted that ES paragraph 7.6.1 [APP-032] states the latter only and this is a wording error in the ES, which should have acknowledged either scenario.</p> <p>Paragraph 7.8.12 [APP-032] of the assessment clarifies that “The construction of the Proposed Project is expected to last two months and is expected to be parallel with the end of construction of the Consented Development. This is anticipated to occur in Q1 2024. In the event that the construction of the Proposed Project occurs after the Consented Development is built the conclusions of this assessment would remain valid, as overlap of the two would be a worst case in terms of transport impacts.”</p> <p>Paragraph 7.8.2 – 7.8.4 [APP-032] provides an assessment based on both scenarios.</p>

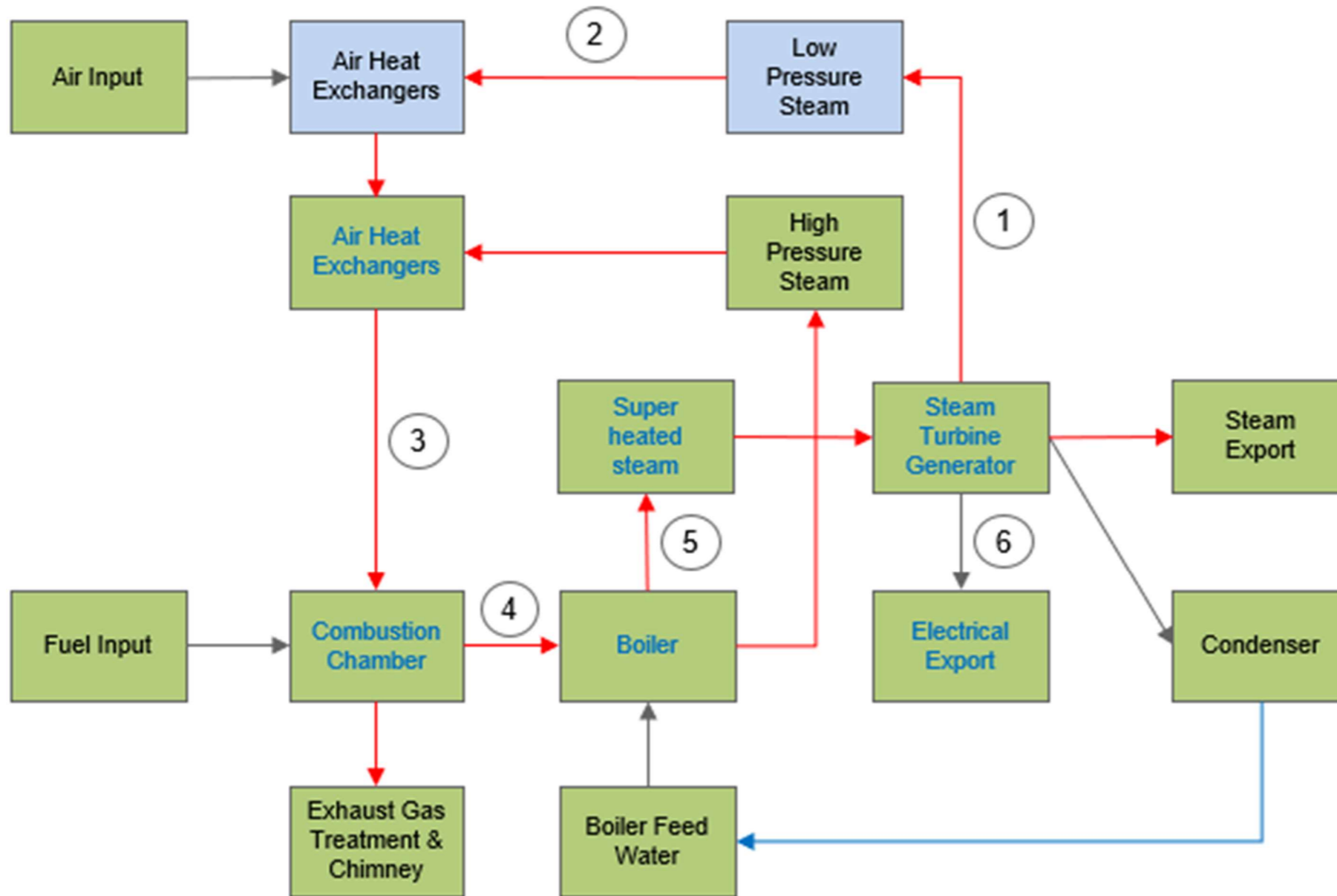
ExQ1	Question to:	Question:	
Q1.7.4	Applicant	The ES estimates that 20 additional staff, equating to 5 additional car parking spaces, would be required in the two month construction period for the Proposed Development [paragraph 7.8.2, APP-032]. Please comment on the implications of this increase for the capacity of the Whitby Road car park, which would be used for construction staff parking.	The timing of the Proposed Project is towards the end of the main construction period for the Consented Development. At this time the number of construction workers will have dropped off significantly from the peak of c700 in January 2023. As of March 2023, it has already dropped to c500 workers. Therefore, the additional 20 workers required for the Proposed Project is not considered material in respect of construction staff parking. In addition, when the Proposed Project is under construction it expected that additional space will be available for up to 50 vehicles in the Stirling Road Laydown area as there will be little need to pre-assembly work on that site.
Q1.7.5	Applicant	ES paragraph 7.7.1 [APP-032] advises that Section 7.7 describes the embedded mitigation measures incorporated into the Proposed Development or assumed to be in place. The section goes on to refer to the approved Construction Traffic Management Plan (CTMP) [APP-062, Appendix 1]. a) Are there any other embedded mitigation measures? b) Would it be necessary to update the CTMP to take into account the Proposed Development?	The ES concludes that the only mitigation required for the Proposed Project is compliance with the CEMP which was approved for the proposed of the Consented Development. Please refer to Ch. 7 Transport and Access paragraphs (see sections 7.7, 7.9, 7.10) [APP-0326-2-7] , Ch.8 Air Quality (see paragraphs 8.7.2, 8.7.4, 8.9.2, 8.9.3) [APP-0336-2-8] , Ch.9 Noise (see paragraphs 9.7.2, 9.7.3, 9.9.1) [APP-0346-2-9] , Ch.10 Ecology (see paragraphs 10.7.2, 10.8.32) [APP-0356-2-10] and Ch.11 Climate Change (see paragraphs 11.7.2, 11.10.1, 11.10.2) [APP-0366-2-11] . No other mitigation is required. The CTMP is part of the CEMP, and forms an appendix to the CEMP, so references to the CEMP in the ES include the CTMP. It is not necessary to update the CTMP for the purpose of the Proposed Project. The Proposed Project will comply with the approved CTMP for the Consented Scheme.
Q1.7.6	Applicant	ES paragraph 7.8.1 [APP-032] advises that the conclusions of the construction phase assessment would still be valid even if the construction of the Proposed Development overran the construction of the consented development. While that may be so for the scale and extent of any impacts, please comment on the implications for the duration of any impacts.	The construction of the Proposed Project is anticipated to require around 20 HGV deliveries over the two-month period. Therefore, the duration of any transport impacts related to the Proposed Project will be short term and temporary. Any overrun of this schedule would be minor; for example a substantial 25% programme overrun is only an additional 15 days. It is therefore not considered an overrun, which increases the duration of impact, would affect the conclusions of the assessment. As stated in response to Q1.7.4, the timing of the Proposed Project is towards the end of the main construction period for the Consented Development. At this time the number of construction workers and deliveries will have dropped off significantly from the peak. Any overrun will therefore be associated with much lower levels of traffic than experienced during the peak construction for the Consented Development and not dissimilar to the baseline flows on the local road network.
Q1.7.7	Applicant	Is any information available on the staff numbers/vehicle movements over the consented scheme construction phase to demonstrate that the Proposed Development would occur after the peak of activity [APP-32 paragraph 7.8.2] and therefore that the assumed reduced numbers at that time would	As noted In Paragraph 4.4.5 [APP-029] , “following completion of the demolition works and enabling works, the main construction work began in May 2021 and are expected to be complete in early 2024.” At this time the number of construction workers will have dropped off significantly from the peak of c700 in January 2023. As of March 2023, it has already dropped to e5500 c500 workers. Therefore, the additional 20 workers required for the Proposed Project is not considered material in respect of construction staff parking and transport movements. In addition, when the Proposed Project is under construction it

ExQ1	Question to:	Question:	
		compensate for the addition of the Proposed Development activity?	expected that additional space will be available for up to 50 vehicles in the Stirling Road Laydown area as there will be little need to pre-assembly work on that site
Q1.7.8	Royal Mail	Please expand on your concerns regarding the effect of the Proposed Development on Royal Mail operations [RR-001].	n/a
Flood Risk			Response
Q1.8.1	Applicant	ES paragraph 12.2.20 [APP-037] states that ‘ <i>Based on the findings to date</i> ’ it is considered that the flood risk from all sources, to and from the Site can be mitigated to a level which is low and acceptable’ (my italics). Please clarify whether it is considered that further assessment is required and, if so, provide an update.	<p>It is acknowledged that that ES paragraph 12.2.20 [APP-037] states that ‘<i>Based on the findings to date...</i>’ and Chapter 12 refers to the ‘Preliminary Flood Risk Assessment’. The Applicant would like to reassure the ExA that the ES (and appendices) remains valid and there is no further assessment needed.</p> <p>Since the submission of the DCO application the baseline data used to inform the Flood Risk Assessment (FRA) has not changed. The Environment Agency Flood Map for Planning (Rivers and Sea) and associated Long-term Flood Risk Maps (Tidal/fluviial, surface water and reservoir flooding) remain the same as those used within the submitted assessment and no further data is provided within publicly available information held by the LLFA.</p> <p>It is therefore considered that the risk of flooding has not changed from the submitted ES/ FRA assessment and no further assessment with regards flood risk is required.</p>
Major Accidents and Disasters			
Q1.9.1	Applicant	Please clarify how the mitigation measures set out in ES paragraph 12.3.16 [APP-037] would be applied to the Proposed Development and secured through the DCO.	<p>The Applicant will be required to comply with all relevant health, safety and environmental legislation as a matter of law. This need not be further secured. Paragraph 4.10.3 of NPS EN-1 states that the decision-maker should “work on the assumption that the relevant pollution control regime and other environmental regulatory regimes, including those on land drainage, water abstraction and biodiversity, will be properly applied and enforced by the relevant regulator. It should act to complement but not seek to duplicate them.”</p> <p>The Proposed Project was designed in accordance with good industry practice, and this design is secured through the works and plans authorised by the dDCO. The construction of the Proposed Project in accordance with good industry practice is secured through compliance with the CEMP (please see Requirements 3(b) and 4 of the dDCO and response to Q1.2.2). The Requirements secure that the operation of the Proposed Project will be in compliance with the same conditions as the existing generating station, ensuring that every part of the extended generating station is subject to the same, uniform set of controls (i.e. constructed and operated in the same way) (please refer to response to Q1.2.6).</p> <p>The Environmental Permit provides a further layer of control, for example with regard to the general management of the extended generating station and operating techniques.</p> <p>A Site Emergency Plan to include a fire strategy and appropriate training procedures is secured through paragraph 3.6, and IC12 of Table S1.3 of Schedule 1 of the Environmental Permit [APP-085].</p>

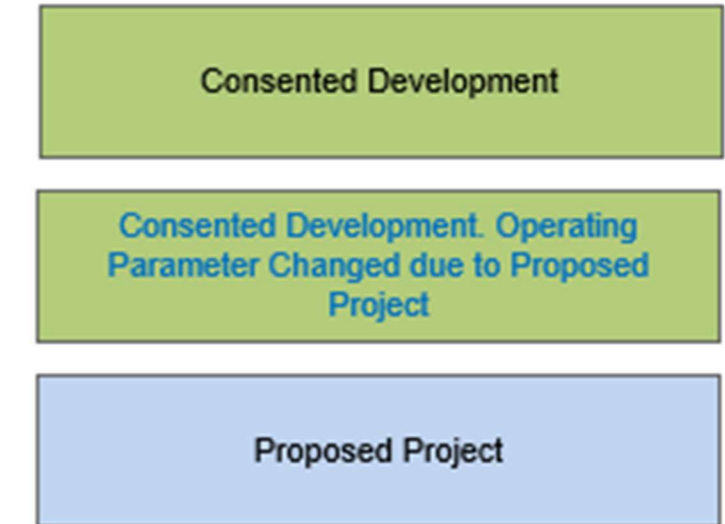
ExQ1	Question to:	Question:	
			Procedures to clearly detail the responsibilities, actions and communication channels for operational staff and personnel on how to deal with emergencies should they occur is secured through paragraph 3.6, and IC12 of Table S1.3 of Schedule 1 of the Environmental Permit [APP-085].

APPENDIX 1: Q1.3.1 SLOUGH MULTIFUEL PROCESS DIAGRAM AND PROCESS OVERVIEW

Slough Multifuel Process Diagram

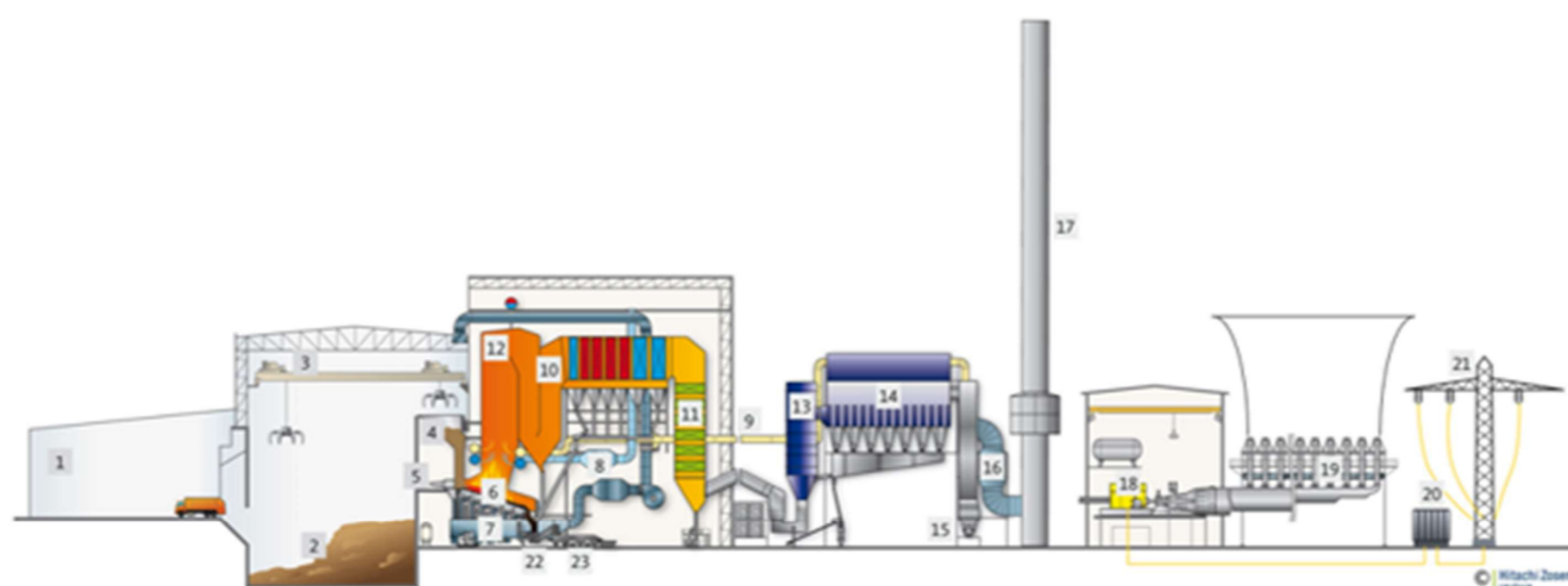


Legend



- 1 Low pressure steam is extracted from the steam turbine
- 2 Low pressure steam is fed into new air heat exchangers increasing the combustion air temperature.
- 3 Combustion air is fed into the combustion chamber at increased temperature.
- 4 Increased energy recovery
- 5 Increased steam generation
- 6 Increased electrical output

Slough Multifuel Process Overview



The air systems are identified by #7 and #8 on the illustration. Combustion air is taken from the waste bunker so that it is under negative pressure (i.e. the odour does not flow out, clean air is drawn in) and the odorous air is used to feed the combustion chamber. The new air heat exchangers would be provided in the air systems to raise the air temperature before it enters the combustion chamber. The turbine is identified by #18 on the illustration. A steam extract would be provided to supply heat to the air heat exchangers.

Waste Receiving and Storage	Combustion and Boiler	Flue Gas Treatment	Energy Recovery	Residue Handling and Treatment
1 Delivery hall	4 Feed hopper	12 Ammonia injection	18 Turbine	22 Bottom ash extractor
2 Waste bunker	5 Ram feeder	13 HZI SemiDry reactor	19 Cooling Tower	23 Bottom ash conveying
3 Waste crane	6 HZI grate	14 Fabric filter	20 Transformer	
	7 Primary air system	15 Induced draught fan	21 Electricity export	
	8 Secondary air system	16 LP preheater		
	9 Flue gas recirculation	17 Stack		
	10 Five-pass boiler			
	11 Economiser			