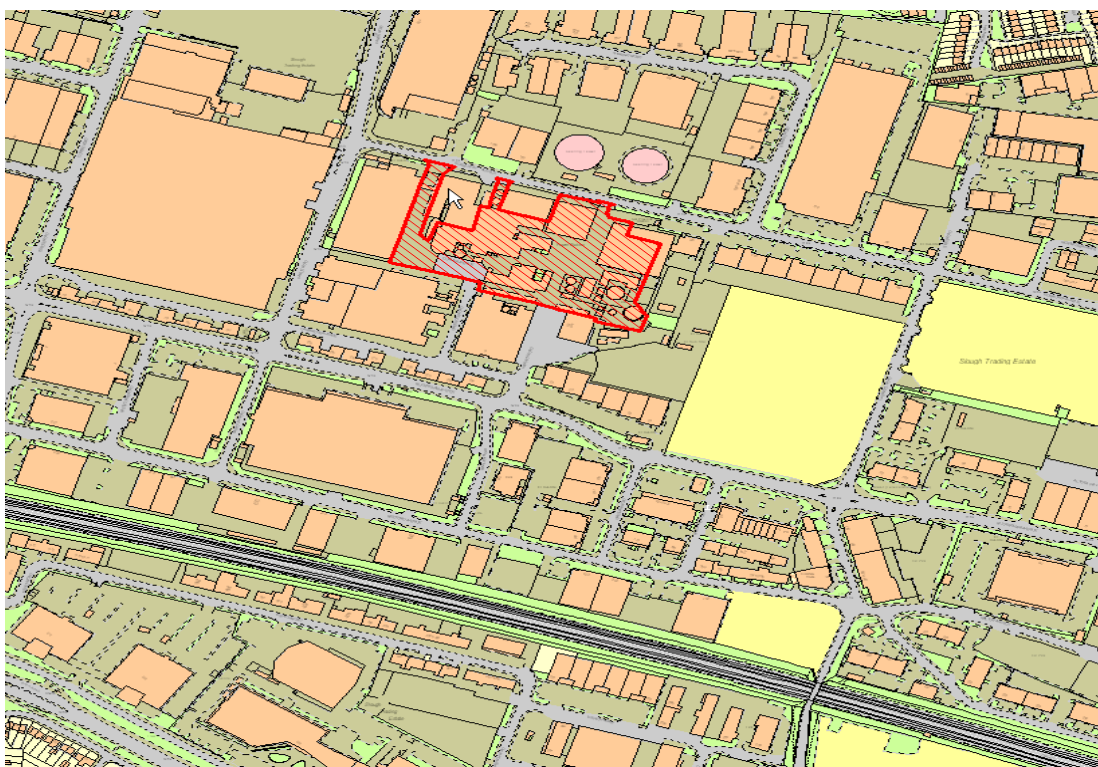


Registration Date:	15-Oct-2014	Applic. No:	P/00987/024
Officer:	Neetal Rajput	Ward:	Farnham
		Applic type:	Major
		13 week	14th
		date:	
Applicant:	Dr. Andrew Ellis, SSE GENERATION LTD		
Agent:	Mr. Ben Hempson, Dalton Warner Davis LLP 21, Garlick Hill, London, EC4V 2AU		
Location:	Slough Heat & Power Station, Edinburgh Avenue, Slough, SL1 4TU		
Proposal:	<p>DEMOLITION OF REDUNDANT PLANT AND BUILDINGS AND DEVELOPMENT OF A MULTIFUEL COMBINED HEAT AND POWER (CHP) GENERATING STATION OF UP TO 50 MEGAWATTS INCLUDING AN ENCLOSED TIPPING HALL; FUEL STORAGE BUNKER AND BLENDING FACILITY; BOILER HOUSE WITH COMBUSTION GRATE/S, BOILER/S AND AUXILIARY EQUIPMENT; FLUE GAS TREATMENT (FGT) PLANT/S; TURBINE HALL WITH CONDENSING STEAM TURBINE; ASH AND RESIDUE HANDLING FACILITIES; ERECTION OF A NEW SOUTH CHIMNEY STACK (UP TO 90 METRES HEIGHT) OR EXTENSION OF EXISTING SOUTH CHIMNEY STACK (UP TO 85 METRES HEIGHT); PLANT, ASSOCIATED DEVELOPMENT AND ALTERATIONS TO SITE ACCESS.</p>		

Recommendation: Delegate to Acting Planning Manager



1.0 SUMMARY OF RECOMMENDATION

- 1.1 This application has been referred to the Planning Committee for consideration as the application is for a major development.
- 1.2 Having considered the relevant policies set out below, the representations received from consultees and all other relevant material considerations, it is recommended that the application be delegated to the Acting Planning Manager for formal determination following finalising conditions and completion of a Section 106 Agreement.

PART A: BACKGROUND

2.0 Proposal

- 2.1 The proposal is for the development of a Multifuel Combined Heat and Power Generating Station of up to 50 megawatts that will convert waste derived fuels into low carbon electricity and heat. This would be the equivalent to providing enough power for up to 111,000 homes as well as heat requirements on the Slough Trading Estate.
- 2.2 The proposed development will comprise demolition of redundant plant and buildings and development of a Multifuel Combined Heat and Power Generating Station. This will involve an enclosed tipping hall and fuel bunker, up to two furnaces where the waste derived fuels will be combusted and boiler units to raise steam, a turbine hall with a steam turbine to generate electricity and up to two flue gas treatment plants to clean the flue gas. There will be the erection of a new chimney stack (up to 90 metres in height) for discharge of cleaned flue gas (which would replace the existing south stack on the site) or an extension to the existing south chimney stack (up to 85 metres in height). Associated development, plant and realigned site access road onto Edinburgh Avenue.
- 2.3 The existing boiler house is the main structure within the application site, at a height of 43m. The two cooling towers to the north of Edinburgh Avenue are approximately 49m high and are visible from some of the nearest residential areas to the north of the site. The two most dominant features in the current site skyline comprise the existing 82m high chimney south stack (to be redeveloped) and the retained 104m north chimney stack, the latter of which is located adjacent to Edinburgh Avenue.
- 2.4 The maximum height of the proposed development will be 90m above ground level for the replacement south chimney stack and 48m for the tallest building, which is the boiler house.
- 2.5 Apart from the means of access, other details are to be determined at a later stage via discharge of conditions. This is because the exact design details and what it will look like cannot be finalised until the appointment of a Contractor. The parameters for the proposed development have been defined by the green line as outlined on the submitted drawings. This clearly defines the bulk, mass and height of the proposed development.
- 2.6 There will be a condition which will require the Applicant to submit further details of design and external materials to be approved by the Local Planning Authority prior to commencement of any building.

- 2.7 The plant will be designed to operate on a 24 hour day basis, seven days a week. The fuel will be made from various sources of processed municipal solid waste, commercial and industrial waste and waste wood which will be processed off site and delivered ready for use within enclosed Heavy Good Vehicles (HGVs). No waste derived fuels will be accepted where it is classified as hazardous waste and, by virtue of the waste being used to generate energy, it will not have a greater negative environmental impact than landfills.
- 2.8 The proposed development will have an estimated maximum capacity of waste derived fuel of 480,000 tonnes per annum of waste derived fuel. All waste derived fuel will be processed off-site and delivered to the site by road using HGVs.
- 2.9 The site already operates under an Environmental Permit as an existing power station burning fibrous fuels. The Applicant has made an application on the 12th December 2014 to the Environment Agency for a variation of the existing permit for the power station. A number of pre-construction and pre-operational conditions are expected to be included in the Permit.
- 2.10 The emissions from the plant would be assessed in detail by the Environment Agency as part of the permitting process. This therefore falls outside of the planning remit and therefore cannot be controlled by the Local Planning Authority. The Environment Agency is also required under the environmental permitting system to ensure that public health is not significantly affected by imposing emission limits that comply with the Industrial Emission Directive. In addition the two options for the south chimney stack will also be considered by the Environment Agency as part of the permitting process.
- 2.11 The waste derived fuels for the proposed development will be delivered by road using HGVs. Vehicular access will be via two existing entrances to the site from Edinburgh Avenue. The vehicles will access at the western end of the site from Edinburgh Avenue, following an anti-clockwise one-way internal road system and then exit at the eastern end of the site back onto Edinburgh Avenue. When operational, the proposed development together with other site activities is expected to generate an average 100 HGV deliveries per day, with up to a maximum 126 deliveries and departures on certain days, this has been secured via a Section 106 Agreement. It should be noted that the total daily traffic movements permitted by previous consents is approximately 126, based upon the traffic assessment received as part of planning application P/00987/022 in 2002.
- 2.12 There will be three permitted HGV routes to the site, these are as follows:
- Route 1 – Farnham Road from either the M40 or Junction 6 of the M4, then arriving via Edinburgh Avenue or Buckingham Avenue.
 - Route 2 – Junction 6 of the M4, using Tuns Lane and Leigh Road (via Bath Road), then either Edinburgh Avenue (via Liverpool Road) or Buckingham Avenue; or Junction 7 of the M4 using the A4 Bath Road, then Leigh Road, and either Edinburgh Avenue (via Liverpool Road) or Buckingham Avenue
 - Route 3 – Junction 7 of the M4, using the A4 Bath Road, then Dover Road and either Buckingham Avenue or Edinburgh Avenue (via Fairlie Road).
- 2.13 With regard to HGVs, the existing restrictions are proposed to be replaced with:
- A maximum of 126 deliveries per day with an expected total of 100 deliveries a day;
 - A maximum of 64 deliveries at night, with a maximum of 3 per hour from the M40 J2 and a maximum of 8 in total;

- HGVs arriving from the west or Midlands will only access the site from M4 junction 7;
- HGVs arriving from elsewhere (excluding nights) will arrive via M4 J6 or 7;
- No HGVs will be scheduled to arrive at site between 07.30 to 09.30 and 16.30-18.30 Monday to Friday; and
- HGVs will not be allowed to arrive at the site from A355 Farnham Road (north of Edinburgh Avenue) during daytime.

2.14 On the north side of Edinburgh Avenue there are currently two large cooling towers, 49m in height which will remain as an integral part of the operation. The appearance of the cooling towers will be improved by repainting them a consistent colour throughout. The proposed development would allow for excess heat to be exported to local heat distribution networks within and potentially just outside the Trading Estate at a later date and will be subject to separate applications.

2.15 The proposed development will provide an average of 300 temporary jobs during the construction period and approximately 20 new permanent full time employment positions during the operation of the proposed development.

2.16 The site demolition, construction and commissioning programme is expected to last 4 years, of this some 18 months will be required to prepare the site through:

- building a replacement site services building and a water treatment plant;
- demolition of redundant plant and buildings; and
- diverting underground services.

Approximately 24 months will be required to construct the new multifuel plant and 6 months will be required to commission the new multifuel plant. The detailed control measures and performance standards, for example lighting, noise, dust, traffic/parking will be set out in the Construction and Environmental Management Plan.

It should be noted that no new electrical connections will be required for the site and the heat supply will be connected to the existing Trading Estate infrastructure meaning that there is no current requirement for offsite works.

2.17 A request for a Scoping Opinion in relation to the propose development was submitted in November 2012. The Local Planning Authority issued a Scoping Opinion on 6th January 2013 responding to the Applicant's proposals for the content of the Environmental Statement.

2.18 Given the overall scale, bulk and mass of the proposed development, the Council's Scoping Opinion requested consideration of the following factors:

- (a) a smaller boiler and fuel store;
- (b) options to lessen the general bulk of the building by alternative design such as lowering the floor level;
- (c) necessary roof plant and proposals for enclosure;
- (d) visual treatment of exterior; and
- (e) design for different technologies using waste derived fuels.

During various pre-application meetings, the Applicant has been working closely with the Local Planning Authority to ensure that the above matters are satisfactorily addressed.

2.19 An Environmental Statement has been submitted with this application. It considers

the potential impacts and measures to be taken in mitigation of the development, including traffic and transportation, air quality, noise and vibration, ground conditions, water resources and flood risk, cultural heritage and archaeology, ecology, landscape and visuals, sustainability and climate change, residual effects, cumulative issues and TV and radio interference.

- 2.20 This application will be determined in parallel with a separate planning application, reference: P/00987/025 for a new central site services building, a water treatment plant and replacement car parking and associated development, serving both this application and the remaining generating station. Hereafter for the purpose of this report, this application will be referred to as Further Development.

3.0 Application Site & Surroundings

- 3.1 Slough Heat and Power currently operates Combined Heat and Power plants for generating electricity and producing heat which is distributed via a network around the Trading Estate. The main sources of fuel are waste wood and waste derived fuels and gas is available as a standby fuel.

- 3.2 The site occupies an area of approximately 1.9 hectares and is located within the Slough Trading Estate which is an identifiable area occupied by various industrial, warehouses, commercial and retail businesses over an area of approximately 158 hectares. Although it should be noted that the site falls outside of the Simplified Planning Zone, Adopted November 2014.

- 3.3 The site is bounded by Edinburgh Avenue to the north, Fairlie Road to the west and Buckingham Avenue/Cambridge Avenue to the south. The eastern boundary abuts existing buildings and the immediate properties surrounding the site are largely commercial and industrial.

- 3.4 The application site is predominately surfaced with impermeable hardstanding and contains numerous buildings and structures of varying age, including boiler houses, turbine halls, fuel storage facilities, switchrooms, offices and other ancillary plant associated with existing combined heat & power units.

The site can be accessed from the M40 via Farnham Road and from the M4 (Junction 6 or 7) via Bath Road A4. There are bus stops on Buckingham Avenue served by 2 bus services. Additionally the site can be accessed by rail from Slough Station approximately 3.7 kilometres east and Burnham Station approximately 1.6 kilometres west of Edinburgh Avenue.

- 3.5 The nearest residential dwellings in this area is about 200 metres to the north in Bodmin Avenue, Greenside, Furnival Avenue and Rowan Way. The nearest park and green space area is Kennedy Park, approximately 400 metres to the north west.

- 3.6 There are no Special Areas of Conservation, Special Protection Areas, Ramsar sites, Site of Special Scientific Interest or National Nature Reserves within a 2km radius of the site.

- 3.7 Two statutory designated nature sites lie within 2km of the site; these are Haymill Valley Local Nature Reserves, located 800m west of the site, and Cocksherd Wood, located approximately 1.4km northwest of the site. In addition, Boundary Copse Woodland Trust Reserve, which is a non statutory site, is located 1.3km north of the site.

- 3.8 The closest European Protected Site is Burnham Beeches Special Area of Conservation, which is located approximately 2.9km north of the site.
- 3.9 The River Thames is the closest principal watercourse and is located approximately 4km south of the site.
- 3.10 The natural topography of Slough and the site are relatively flat. The application site is approximately 32m above ordnance datum.

4.0 Site History

- 4.1 In order to understand the relevant context, a brief outline of the historic use of the site is outlined below:
- Slough Trading Estate was established in April 1920 when the land was purchased from the War Office which had been using it for the repair and recycling of ex War Department Vehicles.
 - Up until the 1960s the site was used as a coal fired power station.
 - Between 1982 and 1991 the principal fuels used at the site were oil and gas, both of which were imported via pipelines.
 - Direct rail deliveries of coal and oil to the power station ceased in 1969 and 1973 respectively.
 - In 1991 a new plant allowed the reintroduction of coal fuel. There are references to the fuel being delivered by lorry.
 - At some subsequent date the gas-fired turbine and coal-fired boilers were decommissioned. At that stage, related traffic movements would have reduced to zero as all gas was imported via pipeline. The railway siding used for oil deliveries post 1973, via an underground pipeline, which surrendered in 2007.
 - Between 1997 and 1999 a new fibre fuel plant and recovery plant were introduced (P/06000/001 and P/00987/019). The waste derived fuel was originally produced on site from material imported by road. These two permissions allowed up to 88 lorry movements per day.
 - A gas fired package boiler was the latest energy plant to be installed within the complex; it was commissioned in 2011 (P/00987/023) to ensure a secure heat supply to the Trading Estate.
 - The biomass/waste wood boilers were fully closed in March 2014.

Full planning history relating to the site is as follows:

Application ref.	Description	Decision
P/00987/023	CONSTRUCTION OF A SINGLE STOREY, DETACHED BOILER HOUSE AND ASSOCIATED 36 METRE HIGH FLUE	Approved 14-Dec-2010
P/00987/022	RELAXATION OF CONDITION 8 OF PLANNING PERMISSION P/00987/013 TO ALLOW AN EXTENSION TO THE HOURS OF DELIVERY	Approved 30-Aug-2007
P/00987/02	RELAXATION OF CONDITION 8 OF	Approved

1	PLANNING PERMISSION REF. P/00987/013 TO ALLOW EXTENSION TO HOURS OF DELIVERY	13-Jan-2006
P/00987/020	INSTALLATION OF MEZZANINE FLOOR AND ALTERATION FOR OFFICE USE (AMENDED PLANS RECEIVED 25.08.98)	Approved 30-Nov-1998
P/00987/019	EXTENSION OF A GENERATING STATION (CIRCULAR 14/90)	Observation 17-Dec-1998
P/00987/018	ERECTION OF SINGLE STOREY EXTENSION TO CANTEEN BUILDING	Approved 02-Apr-1996
P/00987/017	DETAILS OF THE DESIGN AND EXTERNAL APPEARANCE OF THE TURBINE HOUSE BOILER HOUSE AND COAL STORE AS REQUIRED BY CONDITION 5 OF PLANNING PERMISSION P/987/013 APPROVED 10TH JANUARY 1989.	Approved 22-Aug-1990
P/00987/016	ERECTION OF 6 AREAS OF COVERED CAR PARKING SPACES	Approved 30-Mar-1990
P/00987/015	CHANGE OF USE OF PART WORKSHOP TO CANTEEN	Approved 14-Mar-1990
P/00987/014	DEMOLITION OF EXISTING LAGGING STORE AND EXTENSION TO OFFICES TO GIVE EXTRA STOREY	Approved 22-Mar-1989
P/00987/013	REDEVELOPMENT OF PART OF THE EXISTING POWER STATION INVOLVING DEMOLITION OF 2 EXISTING COOLING TOWERS & 76M CHIMNEY STACK AND ERECTION OF TWO COAL/OIL/GAS FIRED BOILERS ONE 30MW STEAM TURBO GENERATOR ANCILLARY PLANT ENCLOSED COAL STORE AND 104M CHIMNEY STACK	Approved 10-Jan-1989
P/00987/012	ERECTION OF AN EXTENSION TO EXISTING SWITCHGEAR ROOM	Approved 15-Nov-1985
P/00987/011	EXTENSION IN HEIGHT OF CHIMNEY STACK AND ANCILLARY FACILITIES TO INCREASE POWER STATION (60SQM)	Approved 29-May-1984

5.0 **Neighbour Notification**

5.1 An extensive consultation has been undertaken, this includes approximately 3,500 letters posted out to local residents surrounding the site and all the commercial properties within the Slough Trading Estate.

Consultation letters were posted out on 17th October 2014 to residents and commercial properties.

5.2 There have been two objections received from local residents on the following grounds:

1. In relation to environmental impact and effect on the green environment;
2. In relation to design;
3. Noise and disturbance to the adjacent residence area; and
4. Devalue the adjacent residential properties.

5.3 **Local Planning Authority response to objections raised:**

Environmental Impact, including the green environment:

In relation to the objection relating to the impact on the environment an Environmental Statement has been submitted as part of this application. The Environmental Statement fully assesses the cumulative effects of the proposed development and in all aspects proposes mitigation measures to avoid potentially significant harm to the environment through the preparation of the Environmental Impact Assessment and evolution of the design of the proposed development.

As a result, many mitigation measures have already been incorporated within the design parameters to eliminate adverse environmental and social effects before they occur – a process termed Impact Avoidance. These include, for example, determining the appropriate stack height to avoid significant effects on local air quality and designated sites, as well as HGV vehicle restrictions so as to avoid adverse effects to nearby communities and habitat sites.

The Demolition and Construction Method Statement and Construction Environmental Management Plan will be prepared and approved by the Local Planning prior to the onset of the demolition and construction phase. It will address all relevant environmental issues including: noise and vibration, waste management, air emissions, hours of working and neighbourhood liaison.

It should be noted that the Council's Environmental Quality Manager has raised no objection to the proposal and has considered the impact of the proposal on the wider environment.

With respect to the green environment, a Landscape Scheme (Drawing No. P390, Dated Sept 2014) has been submitted which demonstrates an upgrade to the existing landscape surrounding the boundary of the site, this will seek to improve the visual amenity along the street scene of Edinburgh Avenue and the implementation of the green wall will enhance the public realm.

Design:

The Applicant has worked closely with the Local Planning Authority to ensure the skyline of the proposed development remains the same, although the elevations and building form will change, the proposed development has been designed to avoid significantly increasing the visual impact.

With regard to the proposed mass and bulk on the eastern part of the development, the views from the north, where the nearest residential properties lie to the site will be fragmented due to the screening effect of the existing cooling towers which are 49m in height.

It should be noted that only the parameter which defines the bulk, mass and height of the proposed development are only to be approved as at this stage, as the exact design details are not known. As a result a condition has been attached which will

require the Applicant to submit further details of the design and external materials to be approved by the Local Planning Authority prior to commencement of any building. The full design details will only be possible to provide until after the appointment of a Contractor.

As part of the Design and Access Statement, a Design Code has been submitted, this is intended to provide an indication of the acceptable standards of design and detailing that will be expected at the detailed design stage once the process provider is appointed.

Noise and disturbance to the adjacent residence area:

There are anticipated to be some minor adverse effects associated with demolition and construction noise. Mitigation will be put in place to ensure these effects are minimised by means of the Construction Environmental Management Plan and the Demolition and Construction Method Statement which will be required to be agreed with the Council prior to commencement of any site works.

Devalue the adjacent residential properties:

The devaluation of adjacent residential properties sits outside of the planning remit and cannot be considered as part of this application. It should be noted that the site is an existing Power Station and has been in operation since the 1920s.

- 5.4 Publicity: In accordance with Article 13 of The Town and Country Planning (Development Management Procedure) (England) Order 2010, a site notice was displayed at the site. The application was advertised in the 24th October 2014 edition of the Slough Express.

6.0 Internal Consultation

6.1 Traffic and Road Safety/Highways Development, Viv Vallance

6.2 *Development Proposal*

The Applicant proposes to demolish part of the redundant plant and buildings in order to construct a multi-fuel combined heat and power facility generating up to 50MW of electrical output and 20MW of heat output. The development also provides an enclosed tipping hall and fuel bunker together with a central site services building, installation of water treatment plant within an existing building, provision of replacement car parking and associated works on the site.

Detailed pre-application discussions were held with the Applicant prior to the submission of the application and the Applicant has submitted a Transport Assessment (TA) and Travel Plan (TP).

Existing Use

The site is currently a Slough Heat and Power (SHP) site and operates as a combined heat and power plant with main sources of fuels being waste wood and waste derived from fuels.

Access

At the main access point on Edinburgh Avenue the entrance barrier will be relocated further into the site to avoid queuing on the road to HGVs protruding and it is proposed that the access and the exit points on Edinburgh Avenue will become yellow box junctions. These works will need to be secured through a Minor Highways Work / S278 agreement.

From the submitted drawings it is not clear where the barriers will be located but they need to be set back a minimum 16.5m from the back edge of the footway (this point should be taken from the footway to the east of the access). The current barrier would appear to be around 12m from this point and therefore the Applicant will either have to accept a planning condition or submit a revised drawing prior to determination showing this detail.

At the main site ingress (in the north-west corner) of the site, this access point is also used as an egress point for cars departing from the adjoining office buildings. Pedestrian visibility splays of 2.4m x 2.4m have not been provided and the area contained within the splays should be kept free of any obstruction exceeding 600 mm in height above the nearside channel level, but currently vegetation obscures the pedestrian visibility splay. Whilst this part of the site is not within the red line of the application site, it does form part of the blue line and therefore I would expect amendments to be made to the junction to make it safer for pedestrians using the Edinburgh Avenue footway. Furthermore there is no direct pedestrian link from the footway towards the office building without having to share the vehicle access. This could be easily provided, but it would involve relocating the SSE sign and brick plinths further west. Again this could be conditioned or the Applicant could provide an amended plan prior to determination.

Visibility splays of 4.5m x 90m can be provided on both sides of the main site egress in the north east corner of the site. On my site visit I noted that there was some overhanging vegetation which potentially could obscure the visibility splay and therefore the Applicant should be reminded to ensure continued maintenance is undertaken.

Outside of 342 Edinburgh Avenue there is no pram crossing on the existing footway that enters the site leading to the offices. It is recommended that this is also provided to assist employees and visitors to the development.

HGV tracking has been provided and it demonstrates that HGV movements can be made.

Travel Plan Coordinator (TPC) and Management Support

A TPC role is noted but no contact details are given. Contact details for this person must be given.

Cycle Parking

Developer has confirmed that secured cycle parking will be provided on site; however developer has not confirmed location for the cycle parking.

S106 Agreement

The Applicant will need to enter into a section 106 agreement with Slough Borough Council, this s106 agreement will obligate the developer to enter into a Minor Highways Work / Section 278 agreement for the satisfactory implementation of the works identified in the highways and transport schedules.

Highways Schedule:

- Yellow box junctions at site access / egress.

Transport Schedule:

- TRICS SAM monitoring requirements;
- Travel plan;

- Travel Plan monitoring contribution of £3k;
- Contribution of £125k to Junction Safety Improvements, Measures to encourage Sustainable Transport including cycle hire; improvements to street lighting;

Changes to Drawings / Travel Plan

- Provide detail showing access barrier set back 16.5m from the back edge of (east) footway at main site ingress point in north west of site;
- Amendments to the access in the northwest corner of the site to address visibility and pedestrian linkage to the offices;
- Pram crossing outside 342 Edinburgh Avenue; and
- Make changes to the Travel Plan.

Recommendation

Subject to securing the above changes and S106 / planning conditions I see no reason for a highway objection.

Conditions

- Cycle Parking

6.3 Environmental Quality Team Comments, Jason Newman

Please see sections 14.0, 15.0 and 16.0 for relevant comments by the Environmental Quality Team. The Environmental Quality Team have also commented in relation to public health, these are below.

6.4 *Public Health*

It is important to understand that it is not for the Planning Authority to undertake Public Health Impact Assessment, but to rely on Government Guidance and other expert statutory agencies advice in this case the Environment Agency. Further that the control of plant emissions are covered by the Industrial Emission Directive (IED). This new directive transposed into UK Law on 20th February 2013 imposes some of the most stringent air pollution limits in Europe for Energy from Waste plant.

Within the context of environmental risk, Slough's main air quality problems (Slough has 4 declared Air Quality Management Areas) and harm to health from air pollution relates to road traffic emissions. It is noted that there will always be some harm associated with the burning of waste derived fuels (indeed any material for that matter) as this will give rise to air pollution.

Additionally careful attention has been paid to the routing of HGVs through the Tuns Lane Air Quality Management Area 3 due to the potential air pollution impacts on residents, even though the Applicants air quality assessment indicates there will be negligible air quality impacts. Nevertheless, in line with Slough Air Quality Action Plan and to ensure a sustainable reduction of air pollution conditions have been secured via a Section 106 Agreement to control movements through the Air Quality Management Area 3 (restricting HGVs movements at rush hour and ensuring all HGVs meet the latest EURO VI standards for emissions).

The Applicant has considered this risk within the context of this Energy from Waste development and completed a detailed Health Impact Assessment within section B2 of the EIS which is based on worst case basis. The plant operating to the IED Emission Limit Values (ELVs) for plants combusting waste derived fuels within 10km of the power station (340,000 people).

The health impact of the development is very small for air emissions. An average 7.5 minutes of life would be lost for the male population and 3.8 minutes for the female population due to exposure of fine particulates (PM_{2.5}) for cardiovascular and respiratory health. The increase in hospital admissions across the adult and child population as a result of this development for respiratory conditions is 0.0042% (0.1 admissions against 2652 admissions per annum).

By way of important context the Department of Health's Committee on Medical Effects of Air Pollutants (COMEAP) 2010 Report calculated the mortality effects of long term exposure to particulate air pollution to be equivalent to 29,000 deaths in the UK (equivalent to loss of life expectancy from birth of 6 months per person in the UK).

The carcinogenic and non-carcinogenic risk to human health impact of emissions arising from metals and organic substances are considered to be well below the levels where there is likely to be any harm caused to the public.

The perception of risk of harm to health can be a material planning consideration where it relates to land use planning matters. However, for this to be given significant weight against the application there needs to be clear evidence of risk. In this case there is no evidence to suggest the proposals will create an unmanageable risk. The proposals will only be able to go forward if it meets the relevant government guidelines through the Environmental Permitting Regulations. On this basis it is considered that no significant weight should be attributed to the perceived fear of risk of harm to health and this is not considered to be a justifiable reason for refusal.

6.5 Ground Conditions, Groundwater and Contamination, Luzia Dumitrescu

6.6 The ground, groundwater and contamination conditions at the site are discussed in Chapter 10 "Ground Conditions" and Chapter 11 "Water Resource and Flood Risk" of the Environmental Statement submitted in and within the Environmental Statement Addendum.

The Environmental Statement references desk studies, historical mapping and previous ground investigation reports that have assessed geology, hydrogeology and potential contamination at the site. Information collated from these sources has been used to produce a Conceptual Site Model (CSM) for the site which identifies all Potential Pollutant Linkages (PPLs) in relation to the proposed development. A pollutant linkage represents the relationship between a source of contamination, the identified receptor and the pathway by which the receptor could be exposed to contamination.

The CSM identified the following:

1. Potential sources of contamination: contaminants of concern associated with the historical land use at the site and the immediately surrounding area include: heavy metals and metalloids, total petroleum hydrocarbons (TPH), polycyclic aromatic hydrocarbons (PAH) and asbestos;
2. Receptors:
 - a. Human Health: construction workers and personnel during the construction phase; and future site users / occupiers of the site;
 - b. Controlled Waters: Taplow Gravel Principal Aquifer; Lambeth Group Secondary A Aquifer; and Chalk Principal Aquifer
3. Pathways:
 - Direct contact with contaminants in shallow soils;

- Direct contact with contaminants in groundwater;
- Inhalation of contaminants from the partitioning of vapours from soil and/or groundwater contamination;
- Migration of vapours of volatile compounds or gases through areas of un-surfaced ground or along service ducts and accumulation in the atmosphere within buildings;
- Built-up of vapours and/or ground gases in confined spaces (such as poorly ventilated rooms, basements etc.)
- Vertical and lateral migration of dissolved phase contaminants from the Made Ground into the underlying aquifers; and
- Vertical and lateral migration of contaminants from the shallow aquifers into the deeper Chalk aquifer.

It should be noted that the above PPLs have been assessed quantitatively only for the area of the former fuel tank farm, which represents only a proportion of the development site. The extent of potential contamination needs to be investigated and assessed for the whole site of the proposed development, which will help inform the remediation strategy (as applicable), as well as the assessment for re-use of excavated soils at the site. Backfilling with site-won materials shall be validated/verified to demonstrate that there are no unacceptable risks to end users. It is expected that the additional investigation would be undertaken upon completion of demolition works. These requirements will be stipulated through the planning conditions.

In addition to the Construction Environmental Management Plan (CEMP), a Construction Waste Management Plan (CWMP) shall be prepared. It is expected that the CWMP will include a Materials Management Plan (MMP) which will provide details of how excavated materials will be managed, segregated, treated (if required), re-used on-site or disposed of off-site.

The report for the former fuel farm also identified one investigation location with high methane concentration, but limited gas flow. However, the report states that there was only one round of ground gas monitoring undertaken and the atmospheric conditions were that of rising atmospheric pressure. Therefore it is unlikely that the monitoring conditions were indicative of the worst case scenario and one round of monitoring is insufficient to accurately characterise the ground gas conditions at the site. Additional ground gas monitoring and/or assessment will be required to confirm that there are no unacceptable risks to end users.

Potential risks to groundwater from contamination are primarily related to the demolition and construction phase. Previous ground investigation at the site, as well as the information from consultation with the Environment Agency indicate that the site is underlain by two Principal Aquifers and a Secondary A aquifer, and lies within a Source Protection Zone 3. Therefore the site lies within a high sensitivity groundwater resources area and the Environmental Agency required additional information and assessment to demonstrate that there are no unacceptable risks from contamination (see Section 16.0).

6.7 Tree Management Officer, Julian Turpin

6.8 Both the above applications involve redevelopment on the Slough Heat and Power site on Edinburgh Avenue within Slough Trading estate.

The larger proposal is P/00987/024 which results in the substantial increase in the

bulk of the buildings to refurbish some of the generating areas of the site. The smaller proposal P/00987025 is to develop service buildings and provide car parking.

There is only a small area to provide any landscaping to contribute to the appearance of the site, and when considering the size of the proposed building it would not be possible to give any substantial screening of the proposal for the immediate area. However any landscaping that can attract the attention will be of value all be it a limited effect. It should also be noted that the immediate area is a trading estate and very commercial in character any break for the build form is desirable. The smaller development proposes the use of a green wall which will give a feature of some interest and an area of screening if it is maintained successfully. The most that can be achieved from the landscaping is to distract from and contrast with the imposing buildings.

In addition to the impact the developments will have on the local area the construction of the larger building will be noticeable in the sky line from a distance and I understand that a 106 contribution has been proposed to provide suitable landscaping to help lessen the view of the development in the future, which will be of affect and increasing so.

If the applications are to be consented I would recommend securing full details of the proposed landscaping and detail of the regime of maintenance to insure good quality features are secured and retained.

6.9 Neighbourhood Enforcement: No response.

6.10 External Consultees

6.11 Royal Borough of Windsor & Maidenhead: No objection.

6.12 Crossrail Limited: The site of this planning application is identified outside the limits of land subject to consultation under the Safeguarding Direction.

The implications of the Crossrail proposals for the application have been considered and Crossrail Limited do not wish to make any comments on this application as submitted.

6.13 British Pipeline Agency Limited: Not in zone of interest, not aware that any of British Pipeline Agency apparatus falls within the vicinity of the location.

Civil Aviation Authority: Note that the tallest structures associated with the proposed development would be either a new 90m high chimney stack or the extension of the existing stack to a height of 85m (heights measured above ground level). Given that, aside from these chimney stack options, no other associated structure would be as high as 50m, I believe the following issues to be worthy of mention:

Aerodrome Safeguarding - the site in question lies beneath / within a portion of airspace of significant relevance to aviation operations associated with Heathrow Airport, some 5-6 miles to the east-southeast. The scale of any related impact upon operations associated with the Airport need to be formally established through the Council providing the aerodrome licensee the opportunity to comment upon the application and supporting documentation. Please note that aerodrome safeguarding responsibility rests, in all cases, with the relevant aerodrome operator / licensee.

Safeguarding of Communication and Navigation Systems - aviation safeguarding responsibility extends beyond that associated with physical safeguarding and includes the safeguarding to ensure the integrity of communications and navigation systems. Whilst the CAA's Safety and Airspace Regulation Group is involved in the technical design of arrival and departure procedures at CAA Licensed Aerodromes such as Heathrow Airport, the safeguarding of those published procedures remains the responsibility of the airport operator. If the operator has related concerns and requires a regulatory input, they will approach the CAA Instrument Flight Procedures staff for guidance.

Aviation Warning Lighting - there is a potential need for aviation obstruction lighting. For background:

In the UK, the need for aviation obstruction lighting on 'tall' structures depends in the first instance upon any particular structure's location in relationship to an aerodrome. If the structure constitutes an 'aerodrome obstruction' it is the aerodrome operator that will review the lighting requirement. For civil aerodromes, they will, in general terms, follow the requirements of CAP 168 - Licensing of Aerodromes. This document can be downloaded from the Civil Aviation CAA website at www.caa.co.uk/docs/33/CAP168.PDF - Chapter 4 (12.8) refers to obstacle lighting.

Away from aerodromes Article 219 of the UK Air Navigation Order applies. This Article requires that for en-route obstructions (ie away from aerodromes) lighting only becomes legally mandated for structures of a height of 150m or more. However, structures of lesser height might need aviation obstruction lighting if, by virtue of their location and nature, they are considered a significant navigational hazard. Routinely, structures less than 150m (492ft) high and away from the immediate vicinity of an aerodrome are not routinely lit for civil aviation purposes.

Cranes - whether in situ temporarily or long term are captured by the points heighted above. Note that if a crane is located on top of another structure, it is the overall height (structure + crane) that is relevant. Crane operations are further discussed below.

In this case, assuming a height of something less than 90m (295ft) and therefore the non-applicability of Article 219, any mandated requirement for the structure to be equipped with aviation warning lighting would depend upon input from Heathrow Airport. That said, it would appear that the stack(s) would likely to be the tallest structures in the immediate vicinity and therefore, even in the event that there proves to be no mandated aerodrome-requirement for lighting, the 'by virtue of their location and nature' argument would make lighting at the stack a sensible

consideration.

Gas Venting and/or Flaring - it is assumed that the facility is not intended to vent or flare gas either routinely or as an emergency procedure such as to cause a danger to overlying aircraft.

Aviation Promulgation. There is a civil aviation requirement in the UK for all structures over 300 feet (91.4m) high to be charted on aviation maps. It follows that if the 300ft/91.4m threshold is reached, when construction time frames are known, the developer should liaise accordingly with the Defence Geographic Centre (dvof@mod.uk) which manages the UK's master database of tall structure from which aviation charting is derived. I should add that even temporary structures such as cranes need to be notified for civil aviation purposes; crane operations are further discussed below.

Crane Operations. CAA's 'Guidance to Crane Operators on Aviation Lighting and Notification' is available at

<http://www.caa.co.uk/docs/33/CAP%201096%20In%20Focus%20-%20Crane%20Ops.pdf> .

In respect of aviation warning lighting, there is a legal requirement for lighting on any crane with a maximum height of 150m or more. Moreover, the CAA further recommends that any crane of a maximum height of 60-150m is also fitted with aviation warning lighting. Additionally, if cranes on the site extend to a height of 300ft or more there will need to be consideration of the need to notify the cranes for civil aviation purposes. Temporary structures can be notified through the means of a Notice to Airmen (NOTAM). To arrange an associated NOTAM, a developer should contact the CAA's Airspace Utilisation Section (ausops@caa.co.uk / 0207 453 6599); they will need an accurate location, an accurate maximum height (including any carriage) and a completion date. If the crane is to be in place for in excess of 90 days it should be considered a permanent structure and will need to be notified as such: to that end you should contact the DGC (contact details above).

Emergency Services Helicopter Activity - due to the unique nature of associated operations in respect of operating altitudes and potentially unusual landing sites, it would be sensible to establish the related viewpoint of local emergency services air support units.

Other Aviation Stakeholders - to complete the aviation picture, it is essential that the Ministry of Defence and NATS are provided the opportunity to comment upon this proposal.

- 6.15 Heathrow Airport Limited, Safeguarding: Assessed the above application against safeguarding criteria and can confirm that we have no safeguarding objections to the proposed development.
- 6.16 English Heritage: Our specialist staff have considered the information received and we do not wish to offer any comments on this occasion.

Recommendation: The application(s) should be determined in accordance with national and local policy guidance, and on the basis of your specialist conservation advice.

6.17 Sport England: Does not wish to comment on this particular application.

6.18 Berkshire Archaeology: Refer to Section 12.0 of this report.

6.19 Highways Agency: No objection.

6.20 Thames Water:

Waste Comments: Thames Water would advise that with regard to sewerage infrastructure capacity, we would not have any objection to the above planning application.

Water Comments: On the basis of information provided, Thames Water would advise that with regard to water infrastructure capacity, we would not have any objection to the above planning application.

6.21 National Planning Casework Unit: No comments to make on this application.

6.22 Health and Safety Executive: No comments to make.

6.23 Network Rail: No observations to make.

6.24 National Air Traffic: No safeguarding objection to the proposal.

6.25 Natural England: Considers the proposals are unlikely to affect any statutorily protected sites or landscapes.

In advising your authority on the requirements relating to Habitats Regulations Assessment, and to assist you in screening for the likelihood of significant effects, based on the information provided, Natural England offers the following advice:

- the proposal is not necessary for the management of the European site;
- that the proposal is unlikely to have a significant effect on any European site, and can therefore be screened out from any requirement for further assessment.

Expect the Local Planning Authority to assess and consider the other possible impacts resulting from this proposal on the following when determining this application:

- local sites (biodiversity and geodiversity);
- local landscape character; and
- local or national biodiversity priority habitats and species.

No objection – no conditions requested

This application is in close proximity to Burnham Beeches Site of Special Scientific Interest (SSSI). Natural England is satisfied that the proposed development being carried out in strict accordance with the details of the application, as submitted, will not damage or destroy the interest features for which the site has been notified. We therefore advise your authority that this SSSI does not represent a constraint in determining this application.

Natural England's detailed comments regarding Air Quality, with specific reference to Chapter 8 of the Environmental Statement:

Dust and Demolition/Construction/Operational Traffic

We agree that impacts arising from combustion emissions from road traffic and potential dust creation associated with the development can be screened out from impacting sensitive sites. Burnham Beeches SSSI/SAC, is located approximately 2.8km from the proposed development, which is well outside the generally accepted buffer of 200m.

Emissions (Critical Levels)

We agree that although the future predicted environmental concentration of NO_x is 91% and thus would indicate that the process contribution may be likely to have a significant effect (as it is greater than 70%), considering the existing background concentration is already at 89.7%, this increase can be considered negligible, particularly as worst case scenarios have been used in developing the models.

The screening results for all other pollutants at the majority of sites (other than the short term average for NO_x) indicate that the process contribution (PC) will be less than 1% of the relevant critical level for the most sensitive habitat and impacts can thus be considered negligible. The predicted short term average for NO_x is 7.4%. However, as this increase is less than 10% of the short term critical level, it can be concluded that this emission is unlikely to have a significant effect and we would agree with the negligible impact conclusion reached.

Depositional Impacts (Critical Loads)

The predicted increase as percentage of Critical Load Function for acid deposition are all below 1% and we agree that this can be considered insignificant according to the significance criteria.

We are satisfied that, on the basis of the objective information provided, it can be excluded that the proposed plan or project will have a significant effect on the Burnham Beeches SAC, either individually or in combination with other plans or projects. Satisfied that the proposed operations are not likely to damage any of the interest features of the Burnham Beeches SSSI.

Natural England also considers that there may be opportunities to provide biodiversity enhancements, for instance roosting opportunities for bats or the installation of bird nest boxes and suggests that these should be secured by condition should permission be granted. Natural England also suggests the application may provide opportunities for landscape enhancements.

6.26 Buckinghamshire County Council: The Development Management team have reviewed the impact of the proposed development on the surrounding highway network in Buckinghamshire, in particular the A355 Farnham Road.

The effect of demolition and construction has been assessed for the expected peak year of 2017. During the demolition and construction period there is estimated to be an average of 300 additional staff onsite (increasing to 500 in the peak months) spread over 3 working shifts throughout the 24 hour day. The greatest effect on Farnham Road (north of Edinburgh Avenue junction) will be in the am peak, with a predicted 9.3% increase in traffic flows. For robustness peak flows have been used to assess the effect of the demolition and construction period, despite the fact that the shift changeovers will be scheduled to avoid peak hours (07:30-09:30 and 16:30 -18:30). The impact on Farnham Road is therefore likely to be significantly less. It is our view that as part of any planning permission granted by Slough Borough Council, a Construction and Environmental Management Plan be secured.

The Construction and Environmental Management Plan should include details on management of parking, provision of minibuses/car share scheme and restrictions on shift start/finish times in order to minimise the effect of traffic on the A355 Farnham Road, particularly during the network peaks.

Restrictions are imposed on the site by Slough Borough Council to a maximum of 126 two-way deliveries per day. Since the closure of part of the plant in 2007 there has been a substantial decrease in HGV traffic, as identified by traffic surveys. The proposed development is expected to contribute to a maximum of 80 HGV deliveries per day, whilst the existing grate boiler will contribute to an additional 20. The trip generation has been estimated on the maximum fuel capacity of the proposed development, which is 20% higher than the design capacity, as such there is likely to be less HGV movements than has been assessed.

We are in support of the proposed restrictions set out in the Transport Assessment and recommend that these are secured as part of any planning permission granted by Slough Borough Council, in order to protect vulnerable road users, reduce congestion during peak periods and minimise the effect of HGV traffic on the A355 Farnham Road.

The proposed operational traffic flows, combined with the existing operational traffic flows for the plant remaining on the SHP site, would not exceed the current permitted traffic flows for the site. In addition the proposed changes to the existing HGV routing restrictions will have a beneficial impact on both capacity and safety on the A355 in Buckinghamshire. We therefore have no objections to the consultation from a highway perspective, providing that Buckinghamshire County Council are consulted on any future submission relating to the Construction and Environmental Management Plan and any changes to the HGV restrictions or routing that has been proposed by the applicant as part of the Transport Assessment.

6.27 Burnham Parish Council: No objection.

6.28 Ministry of Defence: Whilst we have no safeguarding objections to this application, the height of the development will necessitate that aeronautical charts and mapping records are amended. Defence Infrastructure Organisation (DIO) Safeguarding therefore requests that, as a condition of any planning permission granted, the developer must notify the Defence Geographic Centre with the following information prior to development commencing:

- a. Precise location of development.
- b. Date of commencement of construction.
- c. Date of completion of construction.
- d. The height above ground level of the tallest structure.
- e. The maximum extension height of any construction equipment.
- f. Details of aviation warning lighting fitted to the structure(s)

You can e-mail this information to the Defence Geographic Centre to dvof@mod.uk or post it to: D-UKDVOF & Power Lines, Geospatial Air Information Team, Defence Geographic Centre, DGIA, Elmwood Avenue, Feltham, Middlesex, TW13 7AH

6.29 Public Health England:

Point source emissions to air

We are reassured to see that modelled pollutant process emissions do not exceed

relevant UK Air Quality Strategy (AQS) objectives at local receptors, based on a worst case of pollutants being released and including in the background concentration, contributions from the existing Heat and Power station.

Fugitive emissions to air

The demolition of the existing Heat and Power station and the construction and operation of the proposed Combined Heat and Power station has the potential to cause emissions of dust. Whilst the Environmental Statement does mention dust and suggests impacts on local receptors should be negligible there is no mention of any dust control plans or mitigation measures that could be put in place during demolition and construction, should there be an issue with off-site dust and potentially complaints to the local authority. Therefore we would recommend that the local authority should be satisfied that the operator submits a dust control plan and that appropriate dust control measures are in place to prevent the migration of dust beyond the site boundary, for these phases of work.

Odours are considered in the Environmental Statement and it is explained that an Environmental Permit will be applied for, which will describe whether any additional odour controls are required. Public Health England are consultees on Bespoke Part A1 permits and we will review any new information about odour generation and mitigation when it is submitted to us.

It is assumed by Public Health England that the site will comply in all respects with the Environmental Permitting (England and Wales) Regulations 2010. Compliance with the legislation, together with good management, should ensure that site will present a low risk to local human receptors. Based on this application, this development does not present any obvious current cause for concern.

6.30 Britwell Parish Council: The planning application P/00987024 was discussed at the Britwell Parish Council meeting on 29th October 2014. Councillors have requested the following information:

1. What length of time will the disruption on the trading estate during the proposed works be?
2. What traffic mitigation measures will be put into place?

The Applicant attended the Britwell Parish Council meeting on 26th November 2014 and thereafter having spoken to the Clerk, there are no further comments in respect to the application.

6.31 City of London: Summary of their letter:

Burnham Beeches Site of Special Scientific Interest (SSSI)/Special Area of Conservation (SAC)/ National Nature Reserve (NNR), the SAC designation is transposed into UK law via 'Habitats Regulations' which interact with planning legislation. Conservation of the Beeches is a fundamental concern to City of London which seeks to protect it against development. The City also owns and manages Stoke Common SSSI.

SSE have undertaken consultation with City of London, including the opportunity to respond to a draft version of parts of the Environmental Statement and two meetings, we notice that our comments resulted in alterations in the final document.

We are pleased to see the proposal for a green wall and provision for birds, i.e.

Peregrine Falcon.

Concerns relate to air quality, namely:

1. Traffic concerned about level of traffic on the A355 and for this reason monitoring traffic levels on the road around Burnham Beeches. It is noticeable that when traffic builds up on A355, cars cut through on to the small county lanes within Burnham Beeches resulting in extra pollution levels, particularly NOx.

We strongly support the restrictions of no lorry movements during the rush hour periods and the spread of movements across the rest of the day/night.

2. Air quality - Burnham Beeches appears to be in the physical position that will be most affected by emissions, if this is influenced by the stack height/construction then we would ask this to be taken into account when details are finalised.

Impact of increased nitrogen levels - as the natural conditions in Burnham Beeches are nutrient poor, increased nitrogen levels also have the impact of changing other communities, especially lichens and mosses. Lichens have widely been used as an indicator of air quality.

Section 106 to include a contribution towards air quality monitoring (in particular of NOx ammonia and lichens) in and around of Burnham Beeches in order to detect any potential harm related to the proposed development. This is best started before the works commence and continued for at least two years after the station is commissioned.

6.32 National Grid: Affected Apparatus: The National Grid apparatus that has been identified as being in the vicinity of your proposed works is:

- High or Intermediate pressure (above 2 bar) Gas Pipelines and associated equipment;
- Low or Medium pressure (below 2 bar) gas pipes and associated equipment. (As a result it is highly likely that there are gas services and associated apparatus in the vicinity); and
- Above ground gas sites and equipment.

As the proposal is in proximity to National Grid's apparatus, we have referred your enquiry / consultation to the following department(s) for further assessment:

- Gas Distribution Pipelines Team

We request that you take no further action with regards to your proposal until you hear from the above. We will contact you within 28 working days from the date of this response.

The Local will monitor the response received by the Gas Distribution Pipelines Team.

6.33 Spelthorne Borough Council: No objection.

6.34 Environment Agency: In the initial consultation, the Environment Agency have objected to the application, on the basis of incorrect aquifer designation at the site, as presented in Chapter 10, Ground Conditions, and that insufficient information had been provided to demonstrate that risks to controlled waters from any exiting land contamination or potential land contamination has been fully understood and can be addressed through appropriate measures.

Following the initial Environment Agency review, the Applicant has submitted an Addendum to the Environment Statement confirming that the revised aquifer designation would not alter the premises of the assessment. This is due to the fact that the groundwater assessment assumed all aquifers are in hydraulic continuity and as such the most sensitive designation (Principal Aquifer) has been applied to the groundwater receptor. The Addendum also confirmed that site investigation works and risk assessment will be required in the vicinity of the pipeline and former fuel storage tanks to confirm any contamination. It also confirmed that a Piling Risk Assessment will be undertaken prior to the commencement of the foundation piling works.

The Environment Agency have reviewed the URS ES Addendum dated 28 November 2014 and since have withdrawn their initial objection. The following comments and conditions have been received:

Comments:

We note that since the Lambeth Group deposits are considered not to be laterally contiguous across the site that the entire sequence (Taplow Gravel, Lambeth Group and Chalk) is considered to represent a single 'Principal Aquifer'. Whilst we accept that in places there may be hydraulic connectivity, we consider that the Taplow Gravels and the Chalk are two separate Principal aquifers and should therefore be considered as such in your conceptual model. If groundwater sampling (quality and levels) of each aquifer has been undertaken during previous site investigations we would be interested in reviewing the results.

Condition 1

Prior to the commencement of development approved by this planning permission (or such other date or stage in development as may be agreed in writing with the Local Planning Authority), the following components of a scheme to deal with the risks associated with contamination of the site shall each be submitted to and approved, in writing, by the local planning authority:

- 1) A preliminary risk assessment which has identified:
 - all previous uses
 - potential contaminants associated with those uses
 - a conceptual model of the site indicating sources, pathways and receptors
 - potentially unacceptable risks arising from contamination at the site.
- 2) A site investigation scheme, based on (1) to provide information for a detailed assessment of the risk to all receptors that may be affected, including those off site.
- 3) The results of the site investigation and detailed risk assessment referred to in (2) and, based on these, an options appraisal and remediation strategy giving full details of the remediation measures required and how they are to be undertaken.
- 4) A verification plan providing details of the data that will be collected in order to demonstrate that the works set out in the remediation strategy in (3) are complete and identifying any requirements for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action.

Any changes to these components require the express consent of the local planning authority. The scheme shall be implemented as approved.

Reason: To protect groundwater quality. This site is located within source protection zone 3 and over a primary aquifer. The new power station is likely to require the use of deep penetrative foundations, and the potential for mobilising residual contamination from the surface into the Principal Aquifer under the site needs to be fully addressed. This condition is in line with Slough Borough Councils Core Strategy, adopted 2008, Core Policy 8.

National Planning Policy Framework (NPPF) paragraph 109 states that the planning system should contribute to and enhance the natural and local environment by preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels water pollution. Government policy also states that planning policies and decisions should ensure that adequate site investigation information, prepared by a competent person, is presented (NPPF, paragraph 121).

Condition 2

Prior to commencement of development, a verification report demonstrating completion of the works set out in the approved remediation strategy and the effectiveness of the remediation shall be submitted to and approved, in writing, by the local planning authority. The report shall include results of sampling and monitoring carried out in accordance with the approved verification plan to demonstrate that the site remediation criteria have been met. It shall also include any plan (a "long-term monitoring and maintenance plan") for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action, as identified in the verification plan, and for the reporting of this to the local planning authority. The long-term monitoring and maintenance plan shall be implemented as approved.

Reason: To ensure that the site no longer poses a risk to groundwater. This condition is in line with Slough Borough Councils Core Strategy, adopted 2008, Core Policy 8.

Condition 3

No infiltration of surface water drainage into the ground is permitted other than with the express written consent of the Local Planning Authority, which may be given for those parts of the site where it has been demonstrated that there is no resultant unacceptable risk to controlled waters. The development shall be carried out in accordance with the approval details.

Reason: Infiltration of surface water through contaminated land can result in leaching of contamination into the underlying aquifer and increase the rate of migration of any previously contaminated groundwater. This condition is in line with Slough Borough Councils Core Strategy, adopted 2008, Core Policy 8.

Condition 4

Piling or any other foundation designs using penetrative methods shall not be permitted other than with the express written consent of the Local Planning Authority, which may be given for those parts of the site where it has been demonstrated that there is no resultant unacceptable risk to groundwater. The development shall be carried out in accordance with the approved details.

Reason: Piling or any other penetrative foundation design could push contamination into the underlying Principal Aquifers. This condition is in line with Slough Borough Councils Core Strategy, adopted 2008, Core Policy 8.

Condition 5

If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the local planning authority) shall be carried out until the developer has submitted a remediation strategy to the local planning authority detailing how this unsuspected contamination shall be dealt with and obtained written approval from the local planning authority. The remediation strategy shall be implemented as

approved.

Reason: To protect groundwater quality. This condition is in line with Slough Borough Councils Core Strategy, adopted 2008, Core Policy 8.

6.35 South Bucks District Council: The following comments have been received:

An assessment of existing and proposed vehicle movements on the road network of South Bucks District (A355) should be undertaken. Any increase in HGC movements could have an adverse impact on the residents of South Bucks in terms of noise and disturbance and impact on air pollution. The District Council would object to any increase in the number of HGVs travelling through its district. Bucks County Council, the Highway Authority for South Bucks District should be consulted on this application.

Air Quality Receptors are confined to Slough Borough and do not include South Bucks District. An air quality impact assessment on the effects of traffic associated with the construction and operation of the proposed development needs to include the road network in South Bucks District. There is a concern that the proposal could affect the air quality for residents living in South Bucks.

It is important to obtain the views of the City of London and Natural England to determine the impact of the proposal on Burnham Beeches.

Farnham Common has ancient woodland situated about 2.9km to the north of the application site and Local Wildlife site situated in Park Road. These sensitive receptors does not seem to have been taken into account in the submission.

South Bucks District has a number of Conservation Areas including a number of historic buildings. There is a concern that the proposal would increase the visual prominence of the site and it is important to properly consider the impact of the proposals on the setting of these cultural heritage assets within South Bucks District as well as the impact on landscape and visual amenity of the District.

6.36 Local Planning Authority Response:

Vehicle movements on the road network of South Bucks District: An assessment of existing and proposed vehicle movements is included in *Chapter 7: Traffic and Transport* of the Environmental Statement. A full Transport Assessment (TA) was also undertaken.

The geographical extent of the TA (including the location of a series of Automatic Traffic Counts) was agreed with Slough Borough Council and includes an assessment of the impact of traffic on the A355 Farnham Road, travelling north of the Edinburgh Avenue junction (through South Bucks District Council). This is the

only route that passes through South Bucks District that delivery vehicles to the site are permitted to use.

Chapter 7: Traffic and Transport concluded that the demolition/construction phase is predicted to lead to a 1.6% increase in daily traffic along Farnham Road (north of Edinburgh Avenue). This impact would be short-term, lasting only for the duration of demolition/construction, and is considered to be of negligible significance when taking into account the existing traffic levels on this road.

Several mitigation measures have been included in Chapter 7 to control demolition/construction traffic. For example, Paragraph 7.5.15 of Chapter 7 states “Demolition and construction shift changeover will be scheduled to avoid the peak hours (07:30 to 09:30 and 16:30 to 18:30) to avoid the worst affected hours and this will be enforced through the Construction Environmental Management Plan. HGV deliveries will also be scheduled to avoid the weekday peak hours (07:30 to 09:30 and 16:30 to 18:30)...”.

For the operational phase, Paragraph 7.5.53 of Chapter 7 commits the proposed development to a “...maximum of 126 deliveries per day, with an expected total of 100 deliveries per day” and a night-time “maximum of 3 per hour from M40 Junction 2 [the only permitted route through South Bucks District Council]...”. “No HGVs will be scheduled to arrive at site between 07:30 to 09:30 and 16:30 and 18:30 from Monday to Friday” and crucially, HGV deliveries will no longer be allowed to arrive via the A355 Farnham Road (north of Edinburgh Avenue) during daytime hours. The above restrictions would apply to both the demolition/construction phase and operational phase of the proposed development.

These commitments are equal to or better than the current maximum combined total of 126 two-way deliveries per day to site and 3 HGV deliveries per hour at the site during night-time along Farnham Road (Paragraph 7.4.12 of Chapter 7) and has the overall aim of reducing congestion during daytime peak periods.

Air quality receptors do not include South Bucks District: Chapter 8: Air Quality of the Environmental Statement explains that the sensitive receptors for the proposed development were identified through desk study and in consultation with Slough Borough Council. The receptors were selected as those residential areas and habitats most likely to be worst affected by the development, including dwellings within the Tuns Lane Air Quality Management Area. The potential impacts in areas with short term exposure, such as local shops and parks, have also been accounted for in the assessment.

Human receptors in South Bucks District were not included in the assessment

because they did not represent the location of maximum impact, and are therefore expected to be affected less than the receptors currently listed in the Chapter 8 (which are expected to encounter a negligible or minor effect, depending on the location and pollutant of interest). No significant effects were predicted at the worst affected locations and this conclusion can be extrapolated to areas within South Bucks District.

It was not deemed necessary to model the effects of traffic flows in South Bucks District, modelling was undertaken for a discrete receptor along Farnham Road to demonstrate this. This is despite the predicted traffic flows for the site and proposed development being below the current permitted level and comparable to historical trip generation from the site. The slight increase (0.4%) in daily traffic associated with the operational development compared with current levels generated by the site is also below the screening criteria set by Design Manuals for Roads and Bridges and Environmental Protection UK; hence it did not require further consideration in the assessment (however modelling was undertaken, as explained below).

Appendix D-1 within the Environmental Statement to the air quality assessment demonstrates the effect on the worst affected residential receptor along Farnham Road from the additional road traffic flows; the increase in emissions is predicted to represent less than 1% of the Air Quality Standard for all phases of development (demolition/construction and operation) and can be considered an 'imperceptible' magnitude of change, of negligible significance.

In addition, the Applicant has confirmed that all HGVs delivering fuel to the operational proposed development will be EURO VI compliant. This will deliver over a 75% reduction in NO_x emissions compared with the current fleet of HGVs travelling to/from the site and would reduce the modelled negligible effect further.

Impact of the proposal on Burnham Beeches SSSI/ SAC: Both Natural England and City of London have been actively involved in the project during the development process, which included the opportunity to respond to a draft version of parts of the Environmental Statement, as well attending meetings and public exhibition events. The Applicant took on board their comments from both parties and these were incorporated into the final Environmental Statement and both consultees have formally responded to the proposals, stating that proposals are not likely to damage any of the features of the Burnham Beeches SSSI. There will be a contribution to air quality monitoring at Burnham Beeches with the City of London which will be included in the S106 agreement.

Farnham Common has ancient woodland: Secondary data searches undertaken by URS for the Environmental Impact Assessment did not reveal Farnham Common as having ancient woodland designation; however further investigation following receipt of the South Bucks District Council letter has revealed that these external data sources do not always include ancient woodland <2ha in size in its database.

Regardless of the above, the technical guidance for air quality (Environmental Agency, H1 Guidance) requires that ancient woodland only needs to be considered as a receptor if it is within 2km of an emission source. Farnham Common does not fit this criterion. The secondary data search identified that there were no statutorily designated sites within a 2km radius of the Proposed development site. However, for the purposes of the assessment the closest European Protected Site, Burnham Beeches SSSI, was included in the assessment.

It should be noted that Burnham Beeches SSSI, which is a similar distance and direction from the site, was included in the air quality assessment and is predicted to be subject to an 'imperceptible' magnitude of change, of negligible significance.

Impact of the proposals on the setting of these cultural heritage assets within South Bucks District as well as the impact on landscape and visual amenity of the District:

The impact of the proposed development on Conservation Areas and the setting of cultural heritage assets within South Bucks District are discussed in detail in *Chapter 12: Cultural Heritage and Archaeology* of the Environmental Statement.

All conservation areas within 10km of the proposed development Site were identified during the initial appraisal stage by URS. These were assessed prior to the final scoping of heritage assets where effects were likely to occur. From this initial study it was established that those conservation areas beyond 5km were unlikely to experience an effect, predominantly due to the proposed development site being located within an area of dense commercial and industrial structures (Slough Trading Estate). Conservation Areas within the 5km were considered and where site assessment and analysis of existing appraisals identified that there would be no significant effects; they have been scoped out of further assessment. This comprised all but two conservation areas in South Bucks District; Stoke Park Conservation Area and Taplow Conservation Area

Analysis of long range effects (outside of the 5km study area) caused by the proposed development focused on those heritage receptors which have 'designed' views (i.e. heritage receptors which were designed to be viewed from other locations), or where the view from the asset was significant in its heritage value. By their nature, conservation areas tend to be inward-looking, centred on a historic

focal point, such as a street, park or other grouping of assets. In the case of the proposed development, any wide views to the site would also not substantially change due to its current and proposed form and its location.

Where there were Grade I or II* designated assets within a conservation area which have designed or significant views, these were assessed as assets in their own right.

The effects on Stoke Park Conservation Area and Taplow Conservation Area were fully assessed in Chapter 12: Cultural Heritage and Archaeology. The assessment concluded that there would be a minimal change on Stoke Park Conservation Area, and the significance of effect minor adverse. The effect on Taplow Riverside Conservation Area was assessed to be of negligible significance. Further information is presented in Chapter 12: Cultural Heritage and Archaeology.

PART B: PLANNING APPRAISAL

7.0 Policy Background

7.1 The following National Policy and Development Plan documents are considered to be most relevant to the proposal:

National Planning Policy Framework, March 2012 and the Planning Practice Guidance

National Waste Policy

National waste policy is set out in a number of documents. The following have been identified as being relevant in determining proposals that involve waste:

National Planning Policy for Waste, October 2014

The Waste Management Plan for England, December 2013

The Revised EU Waste Framework Directive (2008/98/EC); the Waste (England and Wales) Regulations 2011 (as amended); the Waste (England and Wales) (Amendment) Regulation 2012

The Government Review of Waste Policy in England, June 2011

The Slough Local Development Framework, Core Strategy 2006 – 2026, Development Plan Document, Adopted December 2008

Core Policy 1 – Spatial Strategy
Core Policy 5 – Employment
Core Policy 7 – Transport
Core Policy 8 – Sustainability and the Environment
Core Policy 9 – Natural and Built Environment

Core Policy 10 – Infrastructure
Core Policy 12 – Community Safety

The Local Plan for Slough, Adopted March 2004

Policy EN1 – Standard of Design
Policy EN2 – Extensions
Policy EN3 – Landscaping Requirements
Policy EN5 – Design and Crime Prevention
Policy EN6 – Interference with Telecommunications
Policy EN22 – Protection of Sites with Nature Conservation Interest
Policy EN24 Protection of Watercourses
Policy EN34 – Utility Infrastructure
Policy EMP2 – Criteria for business Developments
Policy EMP7 – Slough Trading Estate
Policy OSC8 – Green Spaces
Policy T2 – Parking Restraint
Policy T8 – Cycling Network and Facilities

Waste Local Plan for Berkshire December 1998, Saved Policies September 2007

Policy WLP1 – Sustainable Development
Policy WLP11 – Proposed preferred areas
Policy WLP27 – Is development needed
Policy WLP28 – Non identified sites for waste management development
Policy WLP29 – Non identified sites for waste management development outside preferred areas
Policy WLP30 – Assessing the impact of development proposals
Policy WLP31 – Information to be provided with applications
Policy WLP33 – Environmental improvements and wider benefits

Other Relevant Documents/Statements

Slough Borough Council Developer's Guide Parts 1-4

7.2 Composite Local Plan – Slough Local Development Plan and the NPPF – PAS Self Assessment Checklist

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that applications for planning permission are determined in accordance with the development plan unless material considerations indicate otherwise. Annex 1 to the National Planning Policy Framework advises that due weight should be given to relevant policies in existing plans according to their degree of consistency with the Framework (the closer the policies in the plan to the policies in the Framework, the greater the weight that may be given).

The Local Planning Authority has published a self assessment of the Consistency of the Slough Local Development Plan with the National Planning Policy Framework using the PAS NPPF Checklist.

The detailed Self Assessment undertaken identifies that the above policies are generally in conformity with the National Planning Policy Framework. The policies that form the Slough Local Development Plan are to be applied in conjunction with a statement of intent with regard to the presumption in favour of sustainable development.

It was agreed at Planning Committee in October 2012 that it was not necessary to carry out a full scale review of Slough's Development Plan at present, and that instead the parts of the current adopted Development Plan or Slough should all be republished in a single 'Composite Development Plan' for Slough. The Planning Committee endorsed the use of this Composite Local Plan for Slough in July 2013.

7.3 The main planning issues relevant to the assessment of this application are considered to be as follows:

1) Whether the principle of the development accords with the development plan, particularly the waste hierarchy, need for the facility, the site location, alternatives and employment;

2) Whether the design, landscape and visual impact, cultural heritage, archaeology, traffic and transportation, air quality and odour, noise and vibration, ground conditions, groundwater and contamination, ecology, flood risk, sustainability and climate change, electronic interference and cumulative impacts can be adequately and appropriately mitigated and controlled.

8.0 Principle of proposed waste development

8.1 The National Planning Policy Framework (NPPF) sets out the Government's planning policies for England and how these are expected to be applied. National policy statements form part of the overall framework of national planning policy, and are a material planning consideration in decisions on planning applications.

8.2 The NPPF establishes a presumption in favour of sustainable development. For decision taking, this means that proposals for development that accords with the development plan shall be approved without delay. While the NPPF does not contain specific waste policies local authorities are required to have regard to the relevant policies in the framework.

8.3 The National Planning Policy for Waste (October 2014) is a material planning consideration and this application has been assessed having regard to its principles. It states the positive planning plays a pivotal role in delivering this Country's waste ambitions through recognising the positive contribution that waste management can make to the development of sustainable communities.

8.4 The National Planning Policy for Waste also states that waste planning authorities should identify, in their Local Plans, sites for enhanced waste management facilities in appropriate locations, including industrial sites. In addition it highlights that where a low carbon energy recovery facility is considered as an appropriate type of development, waste planning authorities should consider the suitable siting of such facilities to enable the utilisation of the heat produced as an energy source in close proximity to suitable potential heat customers.

8.5 The Saved Local Plan policies in the Waste Local Plan (1998) for Berkshire remain in effect. Within the Waste Local Plan the application site is identified as a suitable existing power station site with the capability to burn waste derived fuels. The site has therefore always historically been accepted in terms of its operation as a power station facility, as such its expansion and modernisation of infrastructure is supported to deal with the growing demand required for waste management.

8.6 Furthermore, the Waste Management Plan for England, December 2013 provides Central Government support for waste derived fuels as a recovery operation. It

states that “*The Government supports efficient energy recovery from residual waste of materials which cannot be reused as recycled to deliver environmental benefits, reduce carbon impact and provide economic opportunities*” Recovering heat as well as power (combined heat and power) is favoured where this is practicable as this has the potential to deliver higher overall efficiency and therefore deliver Central Government’s goal of more energy from less waste.

8.7 Government and EU guidance all stress the significance of Waste Hierarchy Framework. These require waste minimisation and waste recycling wherever possible. The Applicant considers that the proposed technologies are recovery in respect of the Waste Framework and indeed the proposed operations include the pre-treatment of all waste, with recyclates removed prior to treatment to ultimately produce electricity and heat.

8.8 Core Policy 8 of the Slough Local Development Framework Core Strategy (2006 – 2026) Development Plan Document December 2008, states that all development will address the impact of climate change. All development should, where feasible, include measures to:

- a) Minimise the consumption and unnecessary use of energy, particularly from non renewable sources;
- b) Recycle waste;
- c) Generate energy from renewable resources;
- d) Reduce water consumption; and
- e) Incorporate sustainable design and construction techniques, including the use of recycled and energy efficient building materials.

The site and development proposed are considered to be acceptable having regard to the above criteria.

8.9 Need

8.10 The requirement to move to a low carbon economy is highlighted in the NPPF, first as a dimension of sustainable development; second as a core planning principle in supporting the transition to a low carbon future; third in the building of a strong competitive low carbon economy in which planning should encourage sustainable economic growth; fourth in the advice that when determining applications, LPAs should not require applicants for energy development to demonstrate the overall need for renewable or low carbon energy and unless material considerations indicate otherwise, they should approve the application if its impacts are (or can be made) acceptable.

8.11 As stated within the Environmental Statement, the Applicant’s wider strategy is to ensure reliable energy supplies to its customers, by providing energy from diverse sources including gas, coal, hydro, wind farms and other forms of low carbon generation. The proposed development is an important constituent of this strategy and will provide new low carbon electricity generation and heat.

8.12 Slough’s Core Strategy states that development at a local level should involve minimising consumption and waste and incorporating renewable energy technology. The proposed development will be capable of supporting the production of low carbon energy through the use of waste derived fuels. The use of waste derived fuels will save landfill space and reduce the associated methane emissions, whilst providing low carbon ‘green’ electricity. Government and EU policies to reduce the quantity of waste sent to landfill promote alternative uses of waste materials including the use of processed waste as a fuel.

- 8.13 The proposed development will make a positive contribution toward addressing a number of challenges, namely:
- The UK Government's climate change commitments which necessitate achieving ambitious reductions in greenhouse gas emissions, principally carbon dioxide (CO₂);
 - Security of national electricity supply through having a mix of energy generating technologies and a diverse range of fuel sources;
 - Maximising energy recovery from waste derived fuels in the form of low carbon (non fossil fuel) electricity and heat that will supply businesses in the local area;
 - Providing local authorities with an outlet for processed municipal solid waste in the form of waste derived fuels;
 - Complementing recycling initiatives by accepting waste after these initiatives have been carried out, thereby forming part of an integrated waste management system;
 - Positive diversion of waste materials that may otherwise be disposed of to landfill, achieving reductions in greenhouse gas emissions (including methane) that would otherwise be generated from the breakdown of the waste materials associated with landfill;
 - Utilising a cooling heat and power network in line with the UK Government's commitment towards developing heating and cooling networks; and
 - Forming part of the continued modernisation of the Slough Trading Estate and green energy credentials of the site.
- 8.14 In addition, the delivery of up to 20MW of space heating and process steam to neighbouring properties on the Trading Estate will assist in maximising the provision of renewable energy generated by the proposed development, this will maintain the option to attract new heat users to the area and serve existing customer base.
- 8.15 As such, it is considered that the need and requirement for the proposed development has been demonstrated in line with Central Government's objectives to achieve renewable energy targets, with lower greenhouse gas emissions than many existing energy technologies (such as coal and gas).
- 8.16 Site Location
- 8.17 There is a long history of the site for power station use, including planning permission for the redevelopment for energy purposes. There is the existence of the necessary infrastructure connections to the site (such as the cooling towers and electricity and heat network), the concentration of energy development in the power station sub-zone, the existing and potential customer base for Cooling Heat and Power within the Trading Estate and the diverse composition of employment uses within the Estate provide a strong land use justification for undertaking the proposed development at this site.
- 8.18 Consideration of Alternatives
- 8.19 The Environmental Impact Assessment Regulations require Environmental Statement to include an outline of the main alternatives studied by the Applicant and an indication of the main reasons for the choice made, taking into account the environmental effect. The submitted Environmental Statement includes an assessment of the main alternatives considered by the Applicant. Consideration has been given to the no development alternative, alternative sites, transport, technologies and designs. As discussed in this report there is a need for the facility and the site location, design and chosen technologies are considered to be in

general accordance with the development plan.

8.20 Overall, the electricity generation and production of heat are proposed and there is potential for nearby industrial properties within the Trading Estate in particular to benefit from this supply. The proposed electricity and heat generation would reduce the use of fossil fuels and provide energy to nearby industrial development. The proposals would also divert waste from landfill. These factors support the sustainability aspects of the proposal.

8.21 Employment

8.22 Core Policy 5 of the Core Strategy relates to employment. The site is located within the Slough Trading Estate Existing Business Area. There is a general presumption against the loss of employment generating uses within the Existing Business Areas.

8.23 This policy sets out that the continued success of the Trading Estate as an employment centre is of great importance to the local economy and the prosperity of the town as a whole. It is also recognised that retailing, leisure, education, health and other service industries are an important source of jobs. As a result they are all classed as “employment” uses for the purposes of this policy.

8.24 In respect of the NPPF’s focus on ‘Building a Strong, Competitive Economy’, the Applicant sets out that the economic benefits of the proposed development were highlighted in the Socio Economic Assessment submitted within the Environmental Statement. The conclusions of the assessment in terms of the economic benefits of the scheme are as follows:

- Demolition and construction at its peak will employ up to 500 workers, over 3 shift periods per day, which is equivalent to 166 workers on site at any one time. The total net additional employment created within the Slough Travel to Work Areas (defined by a wider geographical area than SBC administrative area, including but not limited to High Wycombe, Reading and Hillingdon for example) is estimated to be an average of 237 jobs per year.
- The Applicant will facilitate a number of apprenticeship opportunities during the construction phase, this has been secured via a Section 106 Agreement.
- The proposed development will create approximately 20 new jobs, including the following roles: Shift Operators, Maintenance Technicians, Day Operatives, Engineers and Management (15 net jobs created in the Slough TTWA);
- Encourage the sourcing of local labour through active supply chain management.
- Hold a “meet the buyer day” where the Contractor will liaise with local businesses and suppliers.
- Contribute to an Open for Business initiative or a similar scheme to promote visibility of business opportunities to the local community and suppliers.

8.25 It is considered that the proposal would bring employment benefits through the creation of a significant number of jobs. A currently under utilised site would be brought back into employment use and the continued success of the Existing Business Area would be supported. The proposed development would be acceptable in terms of employment and compliant with Core Policy 5 of the Core Strategy.

9.0 Design

- 9.1 The National Planning Policy Framework sets out the core planning principles which includes a requirement that planning should always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings and encourage the effective use of land.
- 9.2 The National Planning Policy Framework further states that good design is a key aspect of sustainable development is indivisible from good planning and should contribute positively to making places better for people.
- 9.3 Core Policy 8 of the Slough Local Development Framework Core Strategy (2006 – 2026) Development Plan Document December 2008, states that all development will:
- a) Be of a high quality design that is practical, attractive, safe, accessible and adaptable;
 - b) Respect its location and surroundings;
 - c) Provide appropriate public space, amenity space and landscaping as an integral part of the design; and
 - d) Be in accordance with the Spatial Strategy in terms of its height, scale, massing and architectural style.
- 9.4 Policy EN1 (Standard of Design) from the Local Plan, 2004 states development proposals are required to reflect a high standard of design and must be compatible with and/or improve their surroundings in terms of scale; height; massing/bulk; layout; siting; building form and design; architectural style; materials; access points and servicing; visual impact; relationship to nearby properties; relationship to mature trees; and relationship to water courses. These factors will be assessed in the context of each site and their immediate surroundings.
- 9.5 During the pre-application discussions, the design of the proposed development was raised as key matter to ensure that the development does not adversely affect the visual amenity of the immediate and surrounding occupiers and landscape. As such the following principles were established and consideration was given to:
- (a) a smaller boiler and fuel store;
 - (b) options to lessen the general bulk of the building by alternative design such as lowering the floor level;
 - (c) necessary roof plant and proposals for enclosure to limit noise impacts;
 - (d) visual treatment of exterior; and
 - (e) design for different technologies using waste derived fuels.
- The Applicant has worked closely with the Local Planning Authority to satisfactorily address the above issues which are discussed in further detail below. There has been a balance to achieve an acceptable building form that is functional and can be delivered in the long term with consideration of the local characteristics and visual amenities of neighbouring occupiers.
- 9.6 The Applicant also undertook their own consultation with the wider public during the pre-application stage to understand what local issues may affect the proposed development at the site, as well as to help inform the design process for the proposed development. This included a newsletter circulation to 2,500 local residents inviting them to attend a series of public exhibitions. In addition a dedicated project website was set up, whilst posters were circulated to local community hubs and adverts were printed in local newspapers to further advertise consultation events.

9.7 Furthermore, the Applicant had a meeting with Design South East during the pre-application stage, a regional design organisation providing built environment design support for local authorities and the development sector.

The Design Panel made the following points:

- Design was too simplistic and the buildings did not necessarily read in a cohesive style.
- They appreciated the architects approach was to seek to minimise the bulk and height of the new buildings within the context of the presence of the existing buildings by adopting a neutral, recessive colour palette, however the validity of this approach was questioned.
- No question of hiding the building and therefore effort should instead concentrate on ensuring that the design makes a positive architectural contribution, signalling its importance to the Trading Estate and to Slough, achieved by
 - Consideration of a single, large roof sweeping over much of the plant; or
 - A composition of rectilinear volumes could also be valid.
- It was accepted that the building form was to some degree dictated by the linear process of energy generation.
- Because of the building size, colour and lighting would be important considerations. Contrasting colours could reduce the perceived bulk of the complex and that options should be investigated.
- Landscape design elements could be used more productively and not simply trees planted offsite to provide screening. Consideration should be given to green roofs or walls.
- They suggested that a daylight and sunlight assessment should be carried out to ascertain any impact on adjacent residential areas.
- Agreed that although views from close proximity were important the most significant views that should be considered were from Windsor and the M4 travelling London bound.

Given the Panel's strong opinion relating to design matters during the meeting, the design was revised and where appropriate their comments were incorporated. The revised drawings were sent to Design South East for further review and a subsequent meeting took place. The Panel accepted that consideration of previous comments were incorporated into the design, however they were concerned that matters still needed to be addressed and that the level of design had not progressed to greater detail to provide a more convincing solution. Paragraph 9.27 below describes how the key design features have been evolved, taking into consideration the operational, functional and deliverability requirements.

9.8 Although detailed designs have been drawn up for the proposed development, these can only be treated as illustrative as to what the building may look like.

9.9 The Applicant has submitted parameter plans with the design and appearance to be considered post planning via discharge of conditions because the detailed layout and internal design of the plant will not be known until Contractors have been appointed. Decisions about the internal layout, whether there are one or two boilers, will affect the external appearance of the proposed development.

9.10 When assessing the design, the operational requirements, including the deliverability of the proposed development must be taken into consideration. In order to ensure that a range of process plant can be accommodated within the

envelope of the building the current design adopts the maximum parameters based on tenders from five Contractors. The maximum parameters have been established and these have been assessed within the Environmental Statement.

- 9.11 Within the parameters set, further design and evolution work will be required following the selection of a contractor, as such the proposed design is intentionally generic at this stage, given that the full design details are unknown. As such a key factor at this stage is that the design should provide enough flexibility within its form to allow the appointed Contractor scope to optimise the design while at the same time providing sufficient control of the final scheme and details for both the Applicant and the Local Planning Authority. The Applicant has included a Design and Access Statement, together with a Design Code that sets out design details which will be required to be agreed with the Local Planning Authority post consent.
- 9.12 The overall design is for a generating capacity of up to 50 megawatts utilising up to 480,000 tonnes of waste derived fuels and comprising one large or two smaller multifuel boilers and a single turbine.
- 9.13 The existing power station is a recognised landmark on the skyline. Although the elevations and building form will change, the proposed development has been designed to avoid significantly increasing the visual impact. The height of the existing power plant structures (excluding the chimney stacks) formed the basis for determining the maximum height of the proposed development, and during per-application discussions the Applicant agreed with the Local Planning Authority that the existing skyline of the Chilterns, when viewed from the North Terrace of Windsor Castle, should not be adversely affected.
- 9.14 The two most dominant features in the current site skyline comprise the existing 82m high south chimney stack (which would be replaced with a chimney stack up to 90m as part of the proposed development or an extension to 85m) and the retained 104m north chimney stack, the latter of which is located adjacent to Edinburgh Avenue. The proposed 90m chimney stack will be assessed by the Environment Agency through the permitting process. There is no objection raised for the extension of the chimney stack or new replacement given that the existing north chimney stack measures 104m in height. The impact on the visual landscape and heritage assets are discussed below in further detail.
- 9.15 The main structures within the site currently comprise the boiler house, which is 43m high and the boiler house (Boiler 17), which is 30m high. The two cooling towers to the north of Edinburgh Avenue are 49m high and are visible from some of the nearest residential areas to the north of the site.
- 9.66 The maximum height of any proposed new buildings (including roof furniture) has been limited to 48m, less than the 49m high cooling towers. The only exception to this would be the height of a new chimney stack, if required, which would be up to 90m.
- 9.17 The two cooling towers to the north of Edinburgh Avenue are approximately 49m high and are visible from some of the nearest residential areas to the north of the site. In terms of visual impact to the nearest residential properties located north, the eastern part of the development will be fragmented due to the screening effect of the existing cooling towers.
- 9.18 Furthermore, given the distance of 200m to the nearest residential properties and siting of commercial properties in relation to the application, there are no concerns

raised in terms of loss of light or sense of enclosure when taking into consideration the current built form of the site.

- 9.19 A key mitigation measure of the design is to ensure any new buildings reflect the existing building massing with the higher elements clustered in the centre of the site behind the Edinburgh Avenue façade. This respects the existing building heights and ensures that the tipping hall is no higher than the existing fuel store building and fits in with other buildings within the Trading Estate.
- 9.20 In terms of the overall height of the proposed development, this would be kept at a level below the height of the existing cooling towers and the concept is to maintain the simple building forms so that the scale and bulk of the proposed development is no more imposing than that that already exists.
- 9.21 In addition, as part of the proposed development, to improve the visual amenity and public realm, the cooling towers will be repainted, as existing the light grey paint is fragmented in sections.
- 9.22 The internal layout of the proposed development makes efficient use of the available site area and ensures that there is enough room internally within the building envelope to allow for vehicular movement, this will limit the noise from HGVs. The vehicle manoeuvring area remains appropriate for the scale of operations.
- 9.23 The tipping hall which will receive the waste has been designed as an enclosed structure which provides the control of any noise, dust, smell or litter that might be generated during the delivery.
- 9.24 It is considered that the proposed development improves on the visual appearance of the existing site, particularly from the southern view, by removing plant and buildings that have reached the end of their life and replacing these with new cohesively designed and integrated structures.
- 9.25 The proposed bulk, mass and height of the buildings are compatible with the existing buildings and with the exception of the turbine hall, the proposed buildings are set away from the street. There is considered to be no adverse impact upon the surrounding area.
- 9.26 The building form reflects the process of the proposed development and as such the design has been evolved to pull together to the main process plant buildings which are considered to reflect the functionality of the proposed development. Given this, no objection is raised to the proposed bulk, mass, scale and siting of the proposed development.
- 9.27 The key points raised by Design South East have been addressed and as described within the Design & Access Statement, the design takes the following form:
- Design Flexibility – has been addressed through defining the maximum envelope, keeping design simple and submission of a Design Code document to assist in finalising the design details.
 - Design Evolution – taken into account the site constraints.
 - Buildings to reflect the process – the design has evolved to pull together the main process plant buildings and which are now considered to reflect the “clear family relationship”.
 - All enveloping roof – this idea has been developed and ruled out as it

penetrates the skyline from Windsor Castle and would exceed the height of the cooling towers (49m).

- Positive Architectural Contribution – the design has been made bolder and more “convincing” in certain aspects whilst respecting the surrounding architecture and site constraints.
- Colour – a colour assessment has been carried out and presented with limits on the key parameters set out in the Design Code.
- Landscaping – this has been developed, particularly in respect of the streetscape. Green roofing has not been considered for a number of practical reasons; and
- Daylight Study – this assessment had been scoped out of the Environmental Impact Assessment as it was deemed to have little consequence due to the scale of the existing buildings.

The above demonstrates the Applicant’s consideration of the Design Panel’s comments and where possible revisions to the design have been made to incorporate their feedback, this is considered to be acceptable.

9.28 The architect has been mindful of the very sustainable presence of the existing plant and has sought to minimise the height, bulk and mass of the replacement building. Although only illustrative plans have been provided, it is considered that they do represent a high quality of design that will be achievable on this site. The rectilinear form that the proposed development takes provides a clear ‘family’ relationship with the operational requirements taken into account. The drawings clearly define the parameters within which the framework of development must take place and post planning through conditions the design in accordance with the Design Code will provide a suitable design solution.

9.29 No provision is made for advertising and signage, as such any details will require the submission of an application for Advertisement Consent to the Local Planning Authority.

10.0 Landscape and Visual Impact

10.1 The key principles from the NPPF relevant to the Landscape and Visual Impact Assessment and the proposed development are to:

- always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings;
- take account of the different roles and character of different areas; and
- encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value.

The NPPF does not contain specific policies for power generating projects however paragraph 65 notes that Local Planning Authorities should not refuse planning permission for buildings or infrastructure which promote high levels of sustainability.

10.2 Core Policy 8 of the Slough’s Core Strategy Development Plan Document 2006-2026 states all development will respect its location and surroundings. Core Policy 9 requires that development should respect the character and distinctiveness of existing buildings, townscapes and landscapes, and their local designations.

10.3 Policy EMP2 from the Slough Local Plan saved policies, requires development to “not significantly harm the physical or visual character of the surrounding area”,

whilst Policy EN-1 requires development proposals “to be compatible with and/or improve their surroundings in terms of scale; height; massing; layout;...visual impact”.

- 10.4 Policy WLP30 of the Waste Local Plan for Berkshire states that the merits of waste management development proposals will be assessed with regard to:
- The visual impact of the proposed development, and its effect on the landscape;
 - The need to safeguard and enhance areas of attractive landscape and local landscape character;
 - The need to safeguard the character and setting of rivers, canals and streams; and
 - The likely cumulative effects of the proposed development in combination with other developments taking place, or permitted to take place, in the locality.
- 10.5 The Landscape and Visual Impact Assessment undertaken as part of the Environmental Statement (Chapter 14) considers the likely effects of the proposed development upon the existing landscape character and the impact upon the visual amenity of the site and surrounding area within a 5km radius study area. It also considers the cumulative landscape and visual impacts of existing and planned developments.
- 10.6 Sixteen representative viewpoints were agreed with the Local Planning Authority based on the maximum parameters of the proposed development, these included Windsor Castle (within the administrative boundary of Royal Borough of Windsor & Maidenhead) and Stoke Park House (within the administrative boundary of South Bucks District Council).
- 10.7 The surrounding terrain is generally flat to the south of Slough in the River Thames floodplain and its open character allows more far-reaching views than from the north. To the north of the proposed development site the landform gently rises out of Slough through the wooded landscape of South Bucks District. The wooded character of this area filters and screens most views towards the proposed development site. Windsor Castle to the southeast of the proposed development site is on a chalk outcrop which affords it views including the built up area of Slough and the existing buildings and stacks on the site.
- 10.8 The application site lies outside any area designated for its landscape or visual qualities. The site is located within Slough's Trading Estate which houses prominent and bulky existing industrial buildings which would assist in absorbing the proposed scale of the development. The site is screened from the cooling towers as such there will be fragmented views of the proposed development, where the closest residential properties are located, 200m away. Given the distance to residential properties, it is considered that the proposal will not give rise to any adverse impacts to the occupiers of these properties.
- 10.9 However given the overall scale of the proposed development and notably the height of the stacks, the proposed development will be visible from a distance. Although, it should be noted that the maximum height of the proposed buildings has been limited to less than the height of the two cooling towers by 1m to limit visual effects. As a result, there is no major concern in relation to the height of the proposed development.
- 10.10 The Landscape and Visual Impact Assessment states that the proposed

development would not lead to a significant effect on the existing views assessed and that any visual effects, even cumulatively with other developments, are not expected to be significant and will be in keeping with the appearance of the area.

- 10.11 The impacts on landscape and visual amenity are outweighed by the need for this facility and the absence of any realistic alternative to this site.
- 10.12 Green Belt
- 10.13 There would be no significant effect on the character of the landscape beyond the built up area of Slough, as a result of inter-visibility with the proposed development. That area comprises entirely Green Belt (with the exception of some larger settlements). It can therefore be concluded that no harm would result to the openness or permanence of the Green Belt and the setting and special character of historic towns would therefore be preserved.
- 10.14 Landscaping Scheme
- 10.15 A Landscaping Scheme has been proposed to limit the effect of the proposed development on the street scene and improve public realm. There will also be the implementation of a green wall as part of the Further Development application (P/00987/025), also seeks to incorporate measures to soften the views where possible and this is welcomed in accordance with Core Policy 8. As such, the proposal improves on the existing contribution to the streetscape.
- 10.16 Consideration has also been given to enhancing the existing landscape and adding further planting to the external boundaries. There is the opportunity to introduce 'living' walls within the site itself. The ramp walls have been designed to be capable of carrying planting and in certain areas the plinth walls will be constructed to contain planters. Further to this, the north wall of the central site services building (as part of the Further Development application) would also be capable of carrying planting. There will also be off site planting of trees at Kennedy Park which will be secured by a contribution within the Section 106, this should assist the visual aspects as well as providing ecological benefits.

11.0 Cultural Heritage

- 11.1 Within Annex 2 of the NPPF, heritage assets are defined as "A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest". The NPPF sets out a series of policies that are a material consideration to be taken into account in development management decisions in relation to heritage consent regimes established in the Ancient Monuments and Archaeological Areas Act 1979 and the Planning (Listed Buildings and Conservation Areas) Act 1990. The core principle of policies is to conserve and enhance the historic environment and heritage assets.
- 11.2 Paragraph 132 of the NPPF recognises that heritage assets are irreplaceable and that where proposed development may impact on the significance of designated heritage assets, great weight should be placed on its conservation; the more important the asset, the greater the weight should be. Where substantial harm is found, substantial public benefits must be achieved to outweigh this loss. At paragraph 139 the NPPF recognises that non-designated heritage assets of archaeological interest that are demonstrably of equivalent significance to scheduled monuments, should be considered subject to the policies for designated

heritage assets.

- 11.3 The National Planning Practice Guidance (NPPG) provides useful guidance on the assessment of substantial harm. As the primary test of the effect of development upon the significance of heritage assets, guidance is given in the NPPG as to how to assess if the harm is substantial or not. The NPPG states that “in general terms, substantial harm is a high test, so it may not arise in many cases... it is the degree of harm to the asset’s significance rather than the scale of the development that is to be assessed. The harm may arise from works to the asset from development within its setting.”
- 11.4 Core Policy 9 of Slough’s Core Strategy states that development should respect the character and distinctiveness of existing buildings, townscapes and landscapes and their local designations.
- 11.5 Chapter 12 of the Environmental Statement assesses the Cultural Heritage assets, this includes a study undertaken in relation to archaeology, historic buildings and the historic landscape within a 10km radius surrounding the site and the potential effects of the proposed development on these resources. The following cultural heritage assets have been identified and assessed within the Environmental Statement:
- There are no designated heritage assets within the proposed development site boundary.
 - There are three listed buildings but no conservation areas within the 1km study area and a review of baseline conditions has shown that there are no World Heritage Sites, Registered Battlefields or Protected Wrecks within the outer study area.
 - There are a number of Scheduled Monuments, listed buildings and registered parks and gardens within the 10km study area.
 - There are, in total, 22 Scheduled Monuments within or crossing the 10km study area boundary. The nearest is a moated site at Cippenham Court (88) that is located approximately 1.6km to the south of the Site boundary.
 - There are 1598 listed buildings within the 10km study area, with notable concentrations in the built-up areas of Windsor, Eton, Farnham Royal and Cliveden. The closest designated building is the Grade II listed Railway Bridge at Leigh Road (2), 450m to the southeast of the Site boundary.
 - There are 22 English Heritage Registered Parks and Gardens (RPG) within the 10km study area. The closest is Stoke Park Grade II RPG (62), 1.5km to the northeast of the site boundary.
 - There are 18 Conservation Areas (CA) within the 5km CA study area. The closest is Farnham Royal, approximately 1.5km to the north of the site boundary.
- 11.6 The assessment states that during the demolition and construction phase there will be no change and therefore a negligible significance of effect to all designated heritage assets within the 10km study area from construction activities as these are well screened or situated at a considerable distance from the development area,

the Local Planning Authority accepts that this will be the case.

However, this is not the case for once the development is operational as the built form will be lasting and its effects will be visible from a distance. Where the assessment has determined that the impact on heritage assets will be minor adverse significance, these are outlined below with mitigation measures also considered:

11.7 Windsor Castle

Windsor Castle has direct views from the north terrace and the Round Tower to the proposed development site, with the current chimneys of the power station visible from this view. It is considered that there will be little change to the view resulting from the proposed development, and the proposed new boiler house will not be prominent against the skyline being positioned amongst other large industrial buildings and viewed from height. The minimal change in view will not affect the current significance of the building or its setting, however, it will exacerbate the impact caused to significance by the existing chimney stacks. The magnitude of change to this building of high significance is assessed as minimal, resulting in an effect of minor adverse significance.

11.8 Eton College

The buildings of Eton College are sited at a lower level than the Lower Chapel and there are views across to Slough from the upper windows of those buildings located on the north side of the college complex. The stacks associated with the proposed development will be visible in these views, as it is currently and the proposed new boiler house will not be prominent amongst the existing industrial buildings. The chapel itself occupies a rise, and has clear views to the proposed development site. There will be little change in the view resulting from the proposed development, with no effect to the collegiate setting of the buildings, although the new stack heights will increase the current visibility from the chapel to the site. Therefore, the magnitude of change on these buildings of high significance is assessed as minimal, resulting in a minor adverse effect during operation.

11.9 Stoke Park House

Stoke Park House has views across Slough from upper storey windows. The tall chimney stack will rise slightly above the urban mass in this view, although there will be little change from the current view. This change in view will not affect the setting of the building, which is provided by its parkland; however, the views from this prominent building form part of its significance and there will be a change within the view. There will be a minimal change on the asset, and the significance of effect to this asset of high significance will be minor adverse during operation.

11.10 Mitigation

The significance of effects following mitigation from the demolition/construction phase of the proposed development on a number of heritage assets of high significance is assessed as negligible, whilst effects from the operation of the proposed development phase is assessed as negligible to minor adverse which have been outlined above. This is as a result of a minimal change to the setting of these heritage assets of high significance with the operation of the scheme. It is considered that the scheme colour design will limit the effects from the proposed development as far as possible and blend it into the surrounding industrial development, whilst the design intention to avoid the boiler house breaking the hill line to the north and west in views will also limit effects.

11.11 Consideration has been given to the cumulative effect of the proposed development

alongside other consented and planned schemes in the vicinity. There are four schemes under consideration. It is considered that the demolition/construction and operation of the proposed development will not result in any significant (moderate or major) effects or cause substantial harm to heritage assets or the historic environment, as such to refuse the application of heritage assets would not warrant a sufficient reason for refusal.

- 11.12 In line with the NPPF, the impact to the heritage assets has been weighed in accordance with the benefits of redeveloping the site to provide modern infrastructure for the power station and supporting low carbon energy outweighing the minor adverse effects caused, in light of suitable mitigation measures.

12.0 Archaeology

- 12.1 The Applicant has submitted an Environmental Statement that includes a section (Chapter 12) that assesses the impacts of the development proposal on cultural heritage and archaeology.
- 12.2 Chapter 12 sets out a thorough and authoritative account of the known and potential heritage assets within and in the vicinity of the site, assesses past impacts within the site and makes an assessment of the potential effects of the proposal on the buried archaeological heritage.
- 12.3 There are no known heritage assets within or immediately adjacent to the application area. The Applicant's archaeological consultants conclude that the site has been heavily developed since the 1920s with multiple rebuilds and extensions of the power station complex over almost 90 years. Their view is that 20th century development is likely to have removed any archaeological remains from within the site and the development proposal is therefore not expected to have any direct impact on buried archaeological remains within the site.
- 12.4 Although there is little information currently available on below ground conditions, Berkshire Archaeology considers this a reasonable conclusion and concurs with this view. While it is conceivable that small pockets of undisturbed ground may survive within the site, the absence of any known archaeological remains near to the site provides no grounds to search them out.
- 12.5 On this basis, Berkshire Archaeology is content that the information provided with the application addresses the archaeological aspects and that no further archaeological work is merited should consent be granted. As such, given the above, there has been no condition attached in relation to archaeology investigations.

13.0 Traffic and Transportation

- 13.1 The NPPF states among its core planning principles, developments should “actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable”. It requires that all developments generating significant vehicle movements should be supported by a Transport Assessment in which it takes into account all opportunities for sustainable transport modes, safe access to the site and whether there is a need to undertake transport movements which would cost effectively limit significant impacts.
- 13.2 Core Policy 7 of The Slough Local Development Framework, Core Strategy 2006 –

2026, Development Plan Document sets out the Planning Authority's approach to the consideration of transport matters. The thrust of this policy is to ensure that new development is sustainable and is located in the most accessible locations, thereby reducing the need to travel.

- 13.3 Detailed pre-application discussions were held with the Applicant prior to the submission of the application and the Applicant has submitted a Transport Assessment (TA) and Travel Plan (TP).
- 13.4 **Location Accessibility:**
The site is located on Edinburgh Avenue and is within the Trading Estate. The site can be accessed from the M40 via Farnham Road and from the M4 (Junction 6 or 7) via Bath Road A4. There are bus stops on Buckingham Avenue served by 2 bus services. Additionally the site can be accessed by rail from Slough Station approximately 3.7 kilometres east and Burnham Station approximately 1.6 kilometres west of Edinburgh Avenue. The existing site has 8 vehicular access points.
- 13.5 **Highway Safety:**
The TA undertakes a detailed review of highway safety through a 5 year accident analysis of roads within the vicinity of the development and along routes to the development. Across the study area it was found that there were 73 slight accidents and 8 serious accidents over the 5 year period between 01/01/08 and 31/12/13. Of these accidents 4 involved collisions between HGVs and vulnerable road users and all accidents were of slight severity.
- 13.6 **Existing Traffic Volumes:**
Traffic counts have been undertaken on 9 sections of roads in the vicinity of the development and on roads leading to development. These counts found that the network peak hours were between 08.00-09.00 and 17.00-18.00. Traffic counts were also undertaken of the existing site accesses and this found in June 2013 the site was attracting 14 daily HGV arrivals and 14 daily HGV departures. However in recent years the site has not been operating at full capacity. Surveys were undertaken in 2007 which found that 86 arrivals and 86 departures were being made on a daily basis. The existing planning consent for the SHP site allows for a total of 126 deliveries per day i.e. 252 HGV trips per day. Night-time deliveries are currently restricted between hours of 23.00-07.00 to a maximum of 3 HGV deliveries per hour using Routes 1 (via M40 and Edinburgh Avenue) or Route 2 (between M4 J6 and Dover Road, with no deliveries allowed via J7 of the M4).
- 13.7 **Development Proposal:**
The plant will produce two types of by-product, a flue gas treatment residue - approx. 15,000 tonnes per annum which is likely to be collected in sealed HGVs from the secondary access on Edinburgh Avenue, and a wet bottom ash - approx. 80,000 tonnes per annum will be taken off-site in sheeted HGVs.
- 13.8 During the demolition and construction period, there is expected to be 24 abnormal load deliveries, some of which may occur during the peak month, and on average an extra 300 additional staff on-site (500 during the peak month with a maximum of 167 staff on-site at any one time). Access/egress for the staff will be using the south entrance / exit onto Buckingham Avenue during demolition and construction. Access/egress for HGVs will be mainly using the south access from Harwich Road or Greenock Road.
- 13.9 Once operational staff levels will increase by 20 to 52 full time equivalent staff. This

will be an increase on current staff levels, but less than the total that was employed at the site in March 2013 before the closure of the CFB plant.

During operation there will be a one-way system entering the site from Edinburgh Avenue in the north west of the site and exiting in the north east corner of the site back onto Edinburgh Avenue. Flue gas treatment residue may also be collected using a third exit/egress point, which is under the north stack, between the two mentioned access points. This would allow the occasional HGV to back in and collect, then drive onto Edinburgh Avenue and into the site for weighing and then out again in the north east exit to the site.

13.10 Access

At the main access point on Edinburgh Avenue the entrance barrier will be relocated further into the site to avoid queuing on the road to HGVs protruding and it is proposed that the access and the exit points on Edinburgh Avenue will become yellow box junctions. These works will need to be secured through a Minor Highways Work / S278 agreement.

HGV tracking has been provided and it demonstrates that HGV movements can be made. In order to minimize congestion at the main entrance to the site a separate Construction Environmental and Management Plan (CEMP) will be submitted by the Applicant before any works commence on site.

13.11 Existing Planning Conditions

The following existing conditions are in place at the site:

- A maximum combined total of 126 two way deliveries per day for the SHP site as a whole;
- Night-time deliveries are currently restricted to a maximum of 3 HGV deliveries per hour at the SHP site, with no HGV traffic using Junction 7 of the M4 (i.e. Route 3 and part of Route 2, west of Dover Road) during the hours 23:00 to 07:00;
- All commercial vehicles shall use Farnham Road/Edinburgh Avenue, A4 and Dover Road or A4 and Leigh Road to access the SHP site. HGVs have historically accessed the site from Buckingham Avenue then into the site via Harwich Road.

13.12 The three permitted HGV routes to the site are:

- Route 1 – Farnham Road from either the M40 or Junction 6 of the M4, then arriving via Edinburgh Avenue or Buckingham Avenue.
- Route 2 – Junction 6 of the M4, using Tuns Lane and Leigh Road (via Bath Road), then either Edinburgh Avenue (via Liverpool Road) or Buckingham Avenue; or Junction 7 of the M4 using the A4 Bath Road, then Leigh Road, and either Edinburgh Avenue (via Liverpool Road) or Buckingham Avenue
- Route 3 – Junction 7 of the M4, using the A4 Bath Road, then Dover Road and either Buckingham Avenue or Edinburgh Avenue (via Fairlie Road).

13.13 Cumulative Impact Assessment

The committed developments that have been included in this assessment include the LRCC2 and the Britwell Regeneration schemes.

13.14 Demolition and Construction Traffic Trip Generation

13.15 At the pre-application stage, it has been agreed that the development traffic would

be scheduled to avoid the AM and PM peak periods of 07.30-09.30 and 16.30-18.30.

In terms of trip generation the traffic expected at the site per day is:

- 30 arrivals and 30 HGV departures (total 60 trips);
- 500 arrivals and 500 departures (total 1,000 private vehicle trips); and

During the busiest period of the demolition and construction work there will be an estimated 167 arrivals and 167 departures in each of the peak periods for staff travel, but at other times it is likely that there will be 100 arrivals and 100 departures in each of the peak periods.

13.16 Demolition and Construction Traffic Trip Distribution

The construction traffic will access the site via Harwich Road (Buckingham Avenue side) and where necessary other sites may be used as access points by HGV's.

13.17 Network Assessment

The TA considers the impact of the development in 2017, which is considered to be the year of peak activity at the site. Existing traffic flows from the traffic counts have been growthed up using TEMPRO in order to provide an estimate for the 2017 base traffic flows. Taking account of the demolition and construction traffic daily flows will increase by

- 6.5% on Buckingham Avenue – west of Liverpool Road;
- 1.6% on Farnham Road north of Edinburgh Avenue junction;
- 1.6% on Farnham Road south of Edinburgh Avenue junction;
- 7.2% on Buckingham Avenue east of Edinburgh Avenue; and
- HGV flows will increase between 20-25% on Buckingham Avenue and by 5% on Farnham Road during the works.

13.18 *Construction Traffic Mitigation*

A Construction Environmental Management Plan (CEMP) will be prepared by the contractor and submitted prior to the commencement of any demolition or construction work on the site. This should be secured through a planning condition as the Local Highway Authority will wish to comment on the Plan and agree it before its implementation. The CEMP will include:

- Designated construction traffic routes;
- Explanation and measures as to how the contractor will ensure that these routes are used;
- Travel to the site will be managed through this Plan e.g. parking, minibuses, car share;
- Restrictions on start / finish times;
- HGV operators will be encouraged to adopt similar safety measures on their vehicles as adopted by Crossrail for their works traffic (e.g. sidebars, blind spot cameras, audible 'turning left' warnings and reversing beeps) for all HGVs accessing the site. Whilst we requested that this be a requirement of the planning application (at the pre-app stage) I note that the developer is only seeking to encourage this. The safety of vulnerable road users is very important and essential that best practice from the major construction projects in London is implemented in Slough.

13.19 Operational Traffic Trip Generation

Trip generation for the proposed development has been determined from first principles given the bespoke nature of the proposed use. The proposed development is expected to generate 80 deliveries per day, whilst the existing boiler

17 will contribute an additional 20 deliveries per day. Thus in total the site will generate 100 deliveries a day. This is within the existing planning condition limit of 126 HGV deliveries per day.

13.20 Operational Traffic Trip Distribution

HGV's will enter and exit the site via the two existing exit and entrances points on Edinburgh Avenue. It is envisaged that 79% will arrive/depart from the east and 21% to/from the west based on the existing distribution profile. The trip generation at the Farnham Road junction has been assumed as:

- 57% arriving from the north and 43% arriving from the south;
- 36% heading to the north and 64% heading to the south;
- An additional one third of traffic heading east from the site access has been routed south via Liverpool Road and Leigh Road.

13.21 Network Assessment

The effect of the proposed development on the local highway network has been assessed for 2019 base year with traffic growthed up using TEMPRO. The impact on the network as a result of the maximum permitted development will lead to an increase in daily traffic of:

- 3.3% on Edinburgh Avenue west of Liverpool Road;
- 1.4% on Edinburgh Avenue east of Liverpool Road;
- The increases on all other roads will be less than 1%.
- The increases in HGV movements appears to be high on a number of routes, but where there are low numbers of HGVs using routes this can be misleading and this is the reason for high percentage increases. Overall it is proposed that there will be 100 HGV deliveries a day (200 HGV trips), which over a 24 hour day will be around 8 HGVs a hour.

13.22 Highway Impact and Operational Traffic Mitigation

In order to minimise the impact of HGV movements on the Slough road network the developer has agreed to increase the number of night time deliveries, schedule deliveries outside of the peak hours and reduce the number of HGVs using the A355 through Farnham Road shopping area and further north through Farnham Royal throughout the day for safety and amenity purposes. The existing restrictions are proposed to be replaced with:

- A maximum of 126 deliveries per day with an expected total of 100 deliveries a day;
- A maximum of 64 deliveries at night, with a maximum of 3 per hour from the M40 J2 and a maximum of 8 in total;
- HGVs arriving from the west of Midlands will only access the site from M4 junction 7;
- HGVs arriving from elsewhere (excluding nights) will arrive via M4 J6 or 7;
- No HGVs will be scheduled to arrive at site between 07.30 to 09.30 and 16.30-18.30 Monday to Friday; and
- HGVs will not be allowed to arrive at the site from A355 Farnham Road (north of Edinburgh Avenue) during daytime.

13.23 Travel Plan

Introduction / site characteristics and accessibility

The site, its operations and the planning proposals are explained in a lot of detail. However there is no detail about the interim contractor arrangements whilst the site is being redevelopment. Key information about this needs to be included, and the

travel plan needs to really focus on this interim period and catering for all the extra staff on site, as well as reducing demand for travel and opening up travel options to these staff. This information can be provided later when the contractor is appointed. Site accessibility by all modes is noted.

Baseline travel information

No baseline travel information is given. Given that the site is occupied and it is noted that the travel plan is being developed at the site prior to planning permission being determined, there needs to be modal split information within the document. The survey provided in the appendix may be used for this purpose.

Objectives and benefits

Objectives are given, these are largely acceptable and relevant to the site. An additional objective should be given, with a focus on the build period and reducing and managing travel demand.

Targets

Targets are given, these are not SMART targets and need to be. Given the proposed reduction in on-site parking levels, the focus needs to be on reducing Single Occupancy Vehicle (SOV) use and increasing use of car sharing, walking and cycling. The targets are not sufficiently defined and read more like measures.

Measures

Several measures are suggested including promoting home working, teleconferencing etc. Measures need to feature more walking, cycling and public transport initiatives. One measure listed in the targets section suggests looking into travel information for site visitors and contractors. Rather than 'assess the practicality of implementing' this, this needs to be developed as an agreed measure for the travel plan.

Measures specifically focusing on the build period must also be included. Measures as part of the Local Sustainable Transport Fund (LSTF) that SSE will be taking up must also be included.

Monitoring and Reporting Strategy

It is noted that monitoring will be carried out every 3 years. The self-completion surveys need to be carried out every two years. In line with other sites across Slough and Slough Trading Estate, the site will also be required to undertake TRICS SAM surveys in order to monitor the trip generation from the site. These are required at Year 1 and Year 5 from the implementation of the development.

Action Plan

It is noted that the action plan will be developed following the first staff survey. As noted above the staff survey needs to be carried out in order to inform the travel plan at this point. The action plan must also be developed, showing key actions, responsibilities and timescales (NB taking into account pre-planning permission, build period and post-implementation).

Travel Plan Recommendation

The travel plan in its current form will need to be improved in line with the comments above. Once agreed, the travel plan will be secured via Section 106 agreement and subject to a contribution of £3,000 for the Council's monitoring of the travel plan. The Applicant will also be required to commission 2x TRICS SAM surveys.

- 13.24 **Cycle Parking**
Developer has confirmed that secured cycle parking will be provided on site; however developer has not confirmed location for the cycle parking.

Routing and other restrictions (either through S106 or planning conditions)

- A maximum of 126 deliveries per day with an expected total of 100 deliveries a day;
- A maximum of 64 deliveries at night, with a maximum of 3 per hour from the M40 J2 and a maximum of 8 in total;
- HGVs arriving from the west of Midlands will only access the site from M4 junction 7;
- HGVs arriving from elsewhere (excluding nights) will arrive via M4 J6 or 7;
- No HGVs will be scheduled to arrive at site between 07.30 to 09.30 and 16.30-18.30 Monday to Friday; and
- HGVs will not be allowed to arrive at the site from A355 Farnham Road (north of Edinburgh Avenue) during daytime.

- 13.25 The proposed impact on the roads in the vicinity of the site is considered to be minimal during the future operation of the site. The restrictions that the developer has agreed to will help minimise the impact on the network and their support for these restrictions have been welcomed. These restrictions should be secured through the S106 agreement.

Noting that there is an increase in vehicular traffic during the construction period the developer has agreed to make a financial contribution towards highway safety measures at junctions in the vicinity of the development and/or on routes leading to the site used by construction/staff traffic. It is further recommended that there should be some flexibility in how this sum could also be used so as to support measures to encourage sustainable forms of transport to the site such as the roll-out of the Council's bike hire scheme across the Trading Estate and to implement improved street lighting in the vicinity of the development and along routes to the development by the construction/staff traffic. The Applicant has agreed to provide a contribution towards improvement of junction safety measures including carbon reduction measures relating to cycling and improved street lighting.

14.0 Air Quality and Odour

- 14.1 Paragraph 109 of the NPPF states "The planning system should contribute to, and enhance, the natural and local environment by.... preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability". Planning policies should "sustain compliance with and contribute towards EU limit values or national objectives for pollutants", taking into account Air Quality Management Areas (AQMAs).
- 14.2 The NPS for Renewable Energy Infrastructure (EN-3) states that: "Where a proposed waste combustion generating station meets the requirements of Waste Incineration Directive (IED) and will not exceed the local air quality standards, the [determining authority] should not regard the proposed waste generating station as having adverse impacts on health".
- 14.3 Slough's Core Strategy recognises that Slough suffers from problems of congestion, noise and poor air quality, which are all made worse by external factors

such as the proximity of Heathrow airport and the motorways. Core Policy 7 (Transport) emphasises that new development should be sustainable and situated in the most accessible locations; it sets a target for the annual mean NO₂ air quality levels to be 35µg/m³ by 2021.

- 14.4 Slough has declared four AQMAs where the air quality standard objectives for nitrogen dioxide (NO₂) are being breached. The nearest AQMA is located on Tuns Lane/A4 Bath Road less than 1400m from the development. Slough has a developed Air Quality Action Plan to minimise air pollution emissions.
- 14.5 The demolition and construction emissions from plant and dust can be dealt with adequately within the Construction Environment Management Plan via a condition, which will include mitigation measures to control emissions and specify plant to minimise particulate emissions. As the site is located 200m from the nearest residential properties this reduces its impact significantly, from an air quality context.
- 14.6 However, it is the construction movements over the four years that give rise to most cause for concern, particularly with respect to impact on the existing AQMAs. It is noted the Consultant has carried out detailed air quality modelling of construction traffic through the Tuns Lane AQMA. The assessment determines the air quality impact from construction traffic on Tuns Lane AQMA to be negligible. Notwithstanding no construction vehicle should move through the AQMA Tuns Lane between 07.30am and 09.30am and 16.30pm and 18.30pm. This is in line with the Applicant's commitment to avoid congestion during peak hours and paragraph 7.5.15 of Chapter 7 states that "Demolition and construction shift changeover will be scheduled to avoid the peak hours (07:30 to 09:30 and 16:30 to 18:30) to avoid the worst affected hours and this will be enforced through the Construction Environmental Management Plan. HGV deliveries will also be scheduled to avoid the weekday peak hours (07:30 to 09:30 and 16:30 to 18:30)."
- 14.7 The process emission from the power plant have also been considered based on using a single line using the existing extended southern chimney or a twin line into a new 90m chimney both going through a dedicated abatement plant. Atmospheric dispersion modelling was used to assess the air quality impact and the methodology is considered acceptable. The assessment determines the air quality impact on Tuns Lane is 0.2µg/m³ and then combined with road traffic the air quality impact is 0.4 µg/m³ which is 1% of the Air Quality Standard limit and considered to be imperceptible magnitude of change and the effect is considered to be negligible in relation to current guidance. In the Environment Quality Team opinion it is still an increase, and the development is not air quality neutral and will not positively contribute towards the Core Strategy ambition of achieving compliance with the EU air quality limits and target limit for the annual mean NO₂ air quality levels to be 35µg/m³ by 2021.
- 14.8 The developer has agreed to restrict movements of HGVS during rush hour through the AQMA3, and ensure all vehicles are EURO VI compliant. The Applicant has also agreed to a financial contribution towards air quality measures and low emission strategy and mitigation.
- 14.9 The odour modelling indicates residential receptors could be affected by odorous emissions, particularly when the plant is shut down for maintenance. It is advised that the fuel reception hall has carbon filter abatement system fitted to reduce the potential for odorous emissions during the shut down of the facility, this will be secured by a condition.

- 14.10 The residual effects after the mitigation measures are adopted are considered to be negligible and therefore acceptable and subject to appropriate conditions and legal agreements the development should not be refused on air quality grounds.

15.0 Noise and Vibration

- 15.1 The NPPF states that planning policies and decisions should avoid noise from giving rise to significant adverse effects on health and quality of life, including through the use of conditions. It should be recognised that development will often create some noise.
- 15.2 Slough's Core Strategy, Policy 8 (Sustainability and the Environment) states that development should not give rise to unacceptable levels of pollution, including noise and that where appropriate applications should be accompanied by a noise study.
- 15.3 Noise and vibration is a material planning consideration that give rise to nuisance impact, significant community annoyance, and impact to health and wellbeing if person/s are subjected to excessive noise over a prolonged period of time. URS have prepared a detailed Noise and Vibration Impact Assessment Chapter 9 of the Environmental Statement. They have also completed noise modelling to assess both construction and operational impacts. These noise maps are particularly useful in visually understanding the impact of noise from the site. It is clear to see the most significant impacts will be during the construction phase. The hours of demolition and construction will need to be controlled to protect residential amenities via a condition.
- 15.4 The noise and vibration impacts can be broken down into three key areas:
- Predicted noise and vibration levels from the demolition and construction works;
 - Noise resulting from operation of the proposed development; and
 - Change in noise level associated with changes to road traffic attributed to the proposed development.

With respect to the use of BS4142 guidance and setting appropriate noise ratings it is considered setting an absolute level is only appropriate where background noise levels are particularly low (below 35dB) and World Health Organisation criteria needs to be relied on.

Otherwise it is advised the noise rating from the site operations is set at 10 dB below the pre-existing background level that prevails in absence of the development. Therefore the Environmental Quality Team does not agree with the Consultants position that the rating of the installation should be the same as the Background Noise Level to ensure there is no reasonable cause of annoyance Section 9.2.5 , this situation is termed 'marginal' in the regulation it may not affect the majority of people but it could affect some. The guidance states clearly a level of 10dB below background is a positive indication that complaints are unlikely.

URS also state there are no national standards that provide noise limits for construction sites, but actually it is up to Local Authority to specify limit based on local knowledge of the area and existing background/ambient levels that prevail. This can be done by way of condition via the Local Planning Authority or issue of a prior consent under the Control of Pollution Act 1974. The ABC Construction and Demolition Noise Criteria Table 9-2 is an acceptable criteria to use to determine significant effects.

15.5 Within the matrix of significance of effects table 9-1 is negligible effects that the developer should be striving for after suitable mitigation measures are deployed. The control of noise follows four sets processes the first one being the most effective the last the least effective and desirable. These can be summarised as follows:

1. Control of Noise at Source (examples including selecting quieter equipment or methods of working (piling methods), or baffling of noisy equipment at source;
2. Control of Pathway Noise (examples include using barriers and screens or acoustic enclosures;
3. Control at receptor (this means acoustic insulation and ventilation to control noise ingress into residents property); and
4. Management of noise is a mixture of controls to minimise the impact of noise through, control of working hours, duration of noisy works, orientation of noisy equipment etc...)

The table of significance for operation noise effect (Table 9.7) is considered useful significant table it can be seen as per our requirement for rating noise that is 10dB or more below background is considered to be negligible significant effect. This is accepted.

15.6 The nearest residential receptors lies to the north of the site on Bodmin Avenue. The Consultant has chosen several residential receptors Figure 9-1. The Consultant has carried out a noise survey of the existing baseline conditions both daytime and night time. Receptor 7 data Montrose Avenue, should be dismissed due to the humming from the generator operating temporary traffic lights the background level recorded is very high. It is also noted the night-time background level Bodmin Avenue East and West are high and close to the ambient levels that prevail, this suggest the area is affected by plant noise or some other continuous noise source. There is also a concern about some of the night time noise limits applied to Bodmin Avenue East and West, Scaffell Road and Westgate Crescent as these seem on the high side.

15.7 Given the above, it is important the noisiest works take place during the daytime, this should be covered by way of condition. It is considered that the minor adverse impacts predicted for demolition and construction noise is significant and does require mitigation measures to be deployed, these will need to be included within the Construction Environmental Management Plan.

15.8 In summary there shall be no construction activity on site at night, until a detailed the Construction Environmental Management Plan approved by the Local Planning Authority has been submitted, as at this time the impact is considered from the noise modelling to be slight adverse and the night time noise is also a concern.

15.9 Noise impacts from demolition and construction traffic has been determined based on increase in traffic movements and change in noise levels to be less than 1Db on all roads around the site, and is therefore considered the be negligible and no mitigation is required, these conclusions are accepted.

The use of high pitched reversing alarms can give rise to significant community annoyance it is advised all construction and operational HGVs are fitted with broadband (white noise) reverse alarms. The Applicant has confirmed that the any dedicated site vehicle will be fitted with broadband (white noise) reverse alarms and

will work with all hauliers during both the construction and operational phases to maximise the number of white noise reverse alarms fitted, this is considered to be acceptable.

- 15.10 The operational noise from the development is mapped in Appendix E2 Figure 4. The operational noise is considered at some receptors at night to be minor adverse but in all cases the rating level is 35 dB or below and this is well within WHO noise criteria for outside noise. Therefore the operational noise levels from the development are considered acceptable. Also there are no objections are raised with respect to increasing night time HGV movements on route 1, 2 and 3.

16.0 Ground Conditions, Groundwater and Contamination

- 16.1 The issue of soils condition, groundwater and contamination is dealt with in Chapter 10, Ground Conditions and Chapter 11, Water Resource and Flood Risk of the Environmental Statement submitted in and within the Environmental Statement Addendum.
- 16.2 Chapter 10 of the Environmental Statement begins by looking at the relevant legislation, policies and guidance, with reference to Part 2A of the Environmental Protection Act 1990 (as amended), the Water Resources Act 1991 and the Town and Country Planning Act 1990. Reference is also made to the National Planning Policy Framework and Core Policy 8 (Sustainability and the Environment) of the Slough Borough Council's (SBC) Core Strategy Document.
- 16.3 Part 2A of the Environmental Protection Act 1990 defines 'contaminated land' as land 'in such condition, by reason of substances in, on or under the land that - (a) significant harm is being caused or there is a significant possibility of such harm being caused; or (b) significant pollution of controlled waters is being caused, or there is a significant possibility of such pollution being caused'.
- 16.4 This sets a risk-based approach to the contaminated land regime in UK, assessing the relationship between: 1) the source of contamination; 2) the receptor; and 3) the pathway (the route via which the receptor is exposed to the contaminant or pollutant). The relationship between these three components is known as a 'pollutant linkage'.
- 16.5 The contaminated land regime sets the following categories of receptors that are considered in the assessment of risks from land contamination:
- human health – these include final site users (such as, for example, residents, employees, etc.);
 - ecological systems;
 - property (buildings, services, etc.); and
 - controlled waters.

The Water Resources Act defines 'controlled waters' as including both surface water (rivers, lakes, etc.) and groundwater.

- 16.6 The National Planning Policy Framework (NPPF) identifies land identifies land contamination as a material consideration in the planning process and notes that decisions by Local Planning Authorities should ensure the site is suitable for its intended use. Where a site is affected by contamination identified to pose unacceptable risks to receptors, the responsibility for securing a safe development rests with the developer and/or landowner. After remediation, as a minimum, land should not be capable of being determined as contaminated land under Part 2A.

16.7 Core Policy 8 (Sustainability and the Environment) of the SBC's Core Strategy Document states that development shall not 'cause contamination or deterioration in land, soil or water quality' nor shall development occur on polluted land unless appropriate mitigation measures are employed.

16.8 The Environmental Statement describes the methods and approach to the assessment of contamination across the site. This is a staged risk-based assessment, starting with a *qualitative* risk assessment, when risks are assessed are assessed based on the significance/magnitude of effect, and progressing to a *quantitative* risk assessment, when risks are assessed through interpretation of site data against generic or site-specific risk assessment criteria.

Previous reports, site history desk studies and site investigations have been used to collect baseline information on the existing soil and groundwater conditions. This information has been used to formulate a Conceptual Site Model (CSM), which considers all the potential sources of contamination based on historical uses at the site, the receptors associated with the proposed development and the potential pollutant linkages between identified sources and receptors.

16.9 In assessing the baseline conditions, the geology, hydrogeology, unexploded ordnance (UXO) and radon conditions at the site have been considered. A review of the historical mapping of the site and the surrounding area indicated that there is moderate potential for ground contamination to be encountered at the site, and significant potential for contamination from surrounding land uses based on historical activities. A Phase II Environmental Assessment undertaken in December 2009 identified hydrocarbon contamination in soils and groundwater around the former tank farm; however the risk assessment did not identify any unacceptable risks to users based on a commercial/industrial land use. Asbestos was also identified in shallow soils in some locations.

16.10 A range of activities associated with the Enabling Works, including site demolition and preparation, and construction and operation have the potential to affect the soils, groundwater and associated contamination. The following impacts and proposed mitigation measures have been identified for the demolition and construction phase:

- Risks of spillages and mobilisation of pollutants from decommissioning of tanks, pipes, demolition of structures, plant and machinery etc. Such risks will be mitigated through employment of industry best practices and procedures which will be captured within the Construction Environmental Management Plan (CEMP) (an outline is presented in Appendix B-1 in Volume II of the Environmental Statement) and Demolition and Construction Method Statement (DCMS);
- Risk of exposure of construction workers and site personnel to contamination within the soil and groundwater (including asbestos). An asbestos survey will be commissioned prior to demolition of the existing buildings and structures. Risks to construction workers will be mitigated through employing safe methods of work (these will be detailed in the DCMS);
- Risk of groundwater contamination from soils when piling works are undertaken for construction of foundations. A Piling Risk Assessment (PRA) will be prepared and approved by the Environment Agency prior to the commencement of works, which will include mitigation measures to prevent migration of contamination.

- Excavation of contaminated soils and materials will have a beneficial impact for the site, as it would result in a betterment of the site conditions;
- Construction activities will result in generation of waste materials. In order to reduce the indirect negative impacts (such as those associated with disposal to landfill), the developer will aim to reuse and/or recycle as much as possible of the generated materials. These will be detailed in the CEMP, which will also include a Site waste Management Plan (SWMP). Of particular concern is the re-use of excavated materials (soils) where these may be contaminated. Assessment of the extent of contamination across the whole site, as well as implementation and verification of remediation (if required) will be specified through planning conditions, to ensure that there are no unacceptable risks to final users from land contamination.

16.11 The impacts on soil and groundwater, with regards to contamination, during the operational phase are mainly associated with storage of chemicals and potential contaminative substances at the site (such as, for example, storage of liquid fuels, wastes, bulk chemicals, etc.). Through employment of mitigation measures such as good housekeeping, management practices, and design of storage areas in compliance with applicable regulations, the impacts are expected to be reduced to minor adverse or negligible. The proposed fuel storage bunker, which will extend 4 m below ground level, can impact the groundwater in the upper aquifer during operation and therefore design details will require consultation with the Environment Agency.

17.0 Ecology

- 17.1 Legislation for the protection of wildlife and ecology in the United Kingdom includes:
- The Wildlife and Countryside Act, 1981 (as amended);
 - The Countryside and Rights of Way Act, 2000 (as amended);
 - Natural Environment and Rural Communities Act, 2006;
 - The Conservation of Habitats and Species Regulations, 2010 and
 - Wild Mammals (Protection) Act, 1996.
- 17.2 The NPPF states that the planning system should contribute to and enhance the natural and local environment by, among others, minimising impacts on biodiversity and providing net gains in biodiversity where possible.
- 17.3 Slough's Core Strategy includes a number of policies aimed at protecting nature conservation. Developments are required to demonstrate they appropriately mitigate impacts on ecology. The policy of the Spatial Strategy is to direct development into the most accessible locations in the Borough, while protecting other more environmentally sensitive areas from over-development and which is most likely to protect existing biodiversity.
- 17.4 Chapter 13 of the Environmental Statement assesses the potential effects of the proposed development on relevant ecological receptors and includes an Extended Phase 1 Habitat Survey. The aim of the survey was to identify ecological features that could constrain the development and opportunities for biodiversity enhancement.
- 17.5 There are no Special Areas of Conservation, Special Protection Areas, Ramsar sites, Sites of Special Scientific Interest or National Nature Reserves within a 2km radius of the proposed development site. However, the closest European Protected

Site is Burnham Beeches Special Area of Conservation located approximately 2.9km north of the proposed development site.

- 17.6 There are two statutory sites within 2km of the site, namely Cocksherd Wood Local Nature Reserve and Haymill Valley Local Nature Reserve:

- *Cocksherd Wood* is 4ha ancient woodland, approximately 1.4km northwest of the site, contains beech *Fagus sylvatica* woodland with a sparse shrub layer and ground flora running along the chalky northern edge.

- *Haymill Valley* is a designated site is approximately 900m west of the site and covers an area of 8.67ha. It comprises an area of marshy wet woodland, reedbed, streams and open water. The site is described as a valuable haven for wildlife within Slough.

- 17.7 There are three non-statutory sites located within 2km of the proposed development site; Cocksherd Wood Local Wildlife Site (located 1.4km northwest of the Site), Haymill Valley Local Wildlife Site (located 800m west of the Site) and Boundary Copse Woodland Trust Reserve (located 1.3km northeast of the Site).

In addition to the above, Haymill Valley Biodiversity Opportunity Area and Bray to Eton Pits & Meadows Biodiversity Opportunity Area were located within the area of search.

- 17.8 *Bats*

All bat species are fully protected under the Wildlife and Countryside Act and the Habitat Regulations 1994 (as amended). Surveys have revealed that no bat roosts have been recorded within the proposed development site and that bats are unlikely to have colonised any of the buildings on site. As such there is no concern in relation to the impact of the proposed developments on the bat population.

- 17.9 Potential Effects and Mitigation Measures

- 17.10 *Demolition and Construction Phase - Designated Sites*

The closest of the designated sites within the area of search is Haymill Valley Local Nature Reserve/Local Wildlife Site, located 700m to the west. As stated within the assessment these sites are unlikely to be adversely affected by the proposed development during demolition and construction given the urban/industrial nature of the surroundings and the distance between these sites and the proposed development site itself. Any potential effects resulting from noise, light or dust or human activity during demolition and construction will be buffered or screened by the surrounding urban land, resulting in a negligible effect on any designated sites.

Demolition and construction HGV traffic will be routed along Farnham Road/Edinburgh Avenue, A4 and Dover Road or A4 and Leigh Road. The route along the A4 and Dover Road will pass approximately 300m to the south of the Haymill Valley Local Nature Reserve and it is therefore predicted that this will result in a negligible effect on the Haymill Valley Local Nature Reserve.

- 17.11 *Demolition and Construction Phase - Breeding Birds*

Some of the buildings and vegetation on the site may support breeding birds. The temporary loss of nesting features for birds through vegetation removal and

building demolition is considered to be a short-term effect significant at site level and unlikely to adversely affect the conservation status of bird populations.

The following will be undertaken to ensure the protection of birds:

- Demolition during the breeding bird season will require a pre-demolition check by a qualified ecologist only if no breeding birds are found to be present then works can proceed.
- Any areas of bare soil will be checked prior to any enabling works or lay down of materials to ensure that black redstart are not using the area for nesting, if such works are to take place between March and July.
- Surveys will be conducted to locate any peregrine nest prior to any works that could disturb them.
- Demolition of structures near to the eastern end of the boiler house will be undertaken outside the bird breeding season (March and August) to reduce disturbance to possible breeding peregrine as this is the location closest to the possible nest site. If it is not possible to adhere to this, an appropriately qualified ecologist will survey the structures beforehand to confirm that no birds are nesting in the buildings (demolition work will cease if they are found to be nesting).

17.12 *Enhancement Measures*

Although no evidence of peregrine falcon nesting has been recorded during any ecological surveys of the site it is noted that the site is likely to form part of the breeding territory for one pair of this species. In order to enhance the site for peregrine falcons artificial nesting habitat will be provided onsite if they are still deemed to be in residence onsite or in the local area at the start of the demolition and construction phase. A peregrine falcon mitigation and monitoring scheme will be put together post planning and subject to agreement with Slough Borough Council.

17.13 *Operational Phase - Designated Sites*

Atmospheric emissions from the operation of the proposed development have the potential to affect local habitat sites. Emissions of oxides of nitrogen and nitrogen and acid disposition in particular have the potential to adversely affect Burnham Beeches, which is the nearest sensitive receptor within close proximity to the stacks. Chapter 8: Air Quality of the Environmental Statement discusses the predicted effect of atmospheric emissions on habitats in more detail; the stack height has been specifically designed to avoid a significant impact on the local habitat sites and, as a result, a negligible effect is predicted for Burnham Beeches, Stoke Common, Black Park, and at all other ecological receptors.

All commercial vehicles during the operational phase of the proposed development shall use one of the following routes; Farnham Road/Edinburgh Avenue, A4 and Dover Road or A4 and Leigh Road. The route along the A4 and Dover Road will pass approximately 300m to the south of the Haymill Valley Local Nature Reserve, however traffic emissions are imperceptible approximately 150-200m from a major road, and therefore it is predicted that this will result in a negligible effect on the Haymill Valley Local Nature Reserve.

17.14 *Birds*

It is considered that there would be no potential effects on breeding birds during the operational phase of the proposed development. Therefore no mitigation is planned for this phase of works and the effect is considered to be negligible.

- 17.15 Following implementation of the aforementioned mitigation measures and enhancement measures, it is considered that the conservation value of the site for breeding birds will remain unchanged and that legislative constraints will be avoided. In addition it is considered that works would remain in compliance with national and local planning policies. It can therefore be concluded that the proposed development would result in no significant adverse effects. Furthermore, no adverse residual effects are expected to occur as a result of the proposed development.
- 17.16 Cumulative effects occur as a result of the proposed development in combination with one or more other schemes in the local area, which on an individual basis might be insignificant but together could have a significant effect. Four schemes have been identified to be considered within the cumulative assessment; the Leigh Road/Bath Road Central Core Planning Application (P/14515/000 & P14515/003); SSE's simultaneous planning application (P/00987/025) for a central site services building and water treatment plant on the site; and the Britwell Regeneration development (P/15513/100).
- 17.17 The combination of the above developments will result in a number of new residents moving to the area and this could put pressure on existing green spaces including designated sites. However, enhancement measures within this scheme and other cumulative schemes are expected to offset this pressure by providing alternative recreational spaces or, in the case of the Britwell Regeneration, development improvements to local parks. The cumulative effect of the schemes is therefore expected to be negligible.

18.0 Flood Risk

- 18.1 The NPPF outlines that Local Planning Authorities should support the transition to a low carbon future in a changing climate whilst taking full account of (inter alia) flood risk and coastal change. Development in areas at risk of flooding should be avoided by directing development away from areas at highest risk, but where development is necessary, making it safe without increasing flood risk elsewhere.
- 18.2 Core Policy 8 of the Core Strategy states that development will only be permitted where it is safe and it can be demonstrated that there is minimal risk of flooding to the property, and it will not impede the flow of floodwaters, increase the risk of flooding elsewhere or reduce the capacity of a floodplain. It also states that development must manage surface water arising from a site in a sustainable manner which will also reduce the risk of flooding and improve water quality. Sustainable drainage systems should be used to attenuate surface water runoff and to minimise the risk of future sewer flooding where this is practical in terms of ground water levels, geology and land quality.
- 18.3 From a flood risk perspective, there is no objection:
- The proposed development is to be built in Flood zone 1 which has a very low probability of flooding from fluvial or tidal sources.
 - The proposed development is to be built on existing hard standing so will not increase the area of impermeable surfaces so will not increase the risk of surface water flooding elsewhere.

- It is proposed that surface water runoff will be discharged into the ground via soakaways. The remainder will be discharged into the Edinburgh Avenue sewer at a rate that does not exceed the existing situation.
- SSE note that they will seek opportunities to provide betterment to the drainage regime (reducing surface water runoff to Greenfield runoff rates). This could be encouraged.
- The site should be safe during extreme rainfall. They note that they will apply CIRIA 635 to accommodate flooding from extreme rainfall.
- The Applicant is encouraged to regularly inspect and maintain their drainage system as stated within the Flood Risk Assessment and it should be noted that they cannot direct rainfall from the site onto the Highway.

19.0 Sustainability & Climate Change

- 19.1 The Overarching National Policy Statement for Energy (EN-1), July 2011 emphasises the importance of a diverse mix of energy generating technologies, including renewables, nuclear and fossil fuels, to avoid over-dependence on a single fuel type and thereby ensure security of supply. It also recognises the increasingly prominent role waste can play in providing a diversified and decarbonised electricity generation capacity as a future source of fuel on a large scale. This supports Government policy on waste, i.e. to use it as a resource wherever possible.
- 19.2 National Policy Statement for Renewable Energy Infrastructure (EN-3), July 2011 emphasises that the recovery of energy from the combustion of waste, where in accordance with the waste hierarchy, will play an increasingly important role in meeting the UK's energy needs. It also recognises that the recovery of energy from the combustion of waste forms an important element of waste management strategies in the UK.
- 19.3 Slough's Core Strategy in addressing sustainability and the environment acknowledges climate change as a fundamental issue for the future planning of Slough and that among the many considerations, development at a local level should not worsen the wider impacts of climate change resulting from carbon emissions and that this will involve minimising consumption and waste and incorporating renewable energy technology.
- 19.4 Chapter 16 of the Environmental Statement assess sustainability and climate change, a Sustainability Assessment has been undertaken and sets the actions that will be undertaken by the developer that would assist in delivering sustainability benefits for the local and wider area.
- 19.4 Reducing the Use of Natural Resources in Construction Materials
The selection of materials for the construction of the proposed development will be informed by sustainability principles, including the prudent and efficient use of natural resources and the use of re-used and recycled materials. To minimise the use of natural resources and unnecessary materials procured for the proposed development, suitable infrastructure already present on site will be used where possible. For example, the two existing natural draft cooling towers within the SHP

site will provide cooling for the proposed development. Re-using existing structures reduces the need for additional raw materials.

19.5 Minimising use of Water

Water demand for the demolition and construction phase may represent a short-term increase in supply volumes to the site over current levels, although these would still be less than water use when the CFB boilers were operational. The water demand once the proposed development is operational will be comparable to that of the CFB boilers and their associated turbine; therefore the change in demand will be negligible and insignificant.

Wastewater will be treated if necessary to enable compliance with the Environmental Permit for the installation, and will be discharged to the foul sewer.

Water saving measures will be adopted where possible to reduce the effect on the water supply network. These include:

- Condensation of steam from the turbine exhaust for re-use;
- Selection and specification of water efficient equipment to reduce the amount of water required;
- Implementation of staff-based initiatives such as turning off taps, plant and equipment when not in use both on-site and within site offices; and
- The potential for re-use opportunities, e.g. the use of recycling water systems such as site toilets hand wash.

The Applicant has confirmed that water consumption will be monitored through process and administration areas to identify opportunities for water usage reduction and leak detection.

19.6 Energy Efficiency

It is expected that the net thermal efficiency in combined heat and power mode would rise to 35% through the modern design, insulation of surfaces and the installation of plant components that are sized appropriately in optimising efficiency.

In addition, the delivery of up to 20MW of space heating and process steam to neighbouring properties on the Trading Estate will assist in maximising the provision of renewable energy generated by the proposed development, this will maintain the option to attract new heat users to the area and serve existing customer base. Further investigation into the heat demand in the Leigh Road/Bath Road Core Central development and in Slough town centre will be undertaken; when combined, these areas may provide adequate heat demand to support the required infrastructure. There will also be electricity for export to the UK power grid. This reduces waste heat and replaces the need for fossil-fuel generated heating.

19.7 Waste Minimisation

A Demolition and Construction Method Statement and Construction Environmental Management Plan will be produced for the proposed development, which will describe the specific mitigation measures to be followed to reduce effects (including waste) throughout demolition and construction.

To minimise waste generation by the operational plant, ash will be collected and recycled where possible, or otherwise disposed of to an appropriately licensed landfill offsite.

19.8 In addition, the proposed development will operate using a diverse range of waste derived fuels. It will utilise non-hazardous materials diverted from landfill in accordance with the Waste (England and Wales) Regulations 2011 derived from the Waste Framework Directive 2006, 2008 and the Waste Strategy for England 2007. This will save landfill space and reduce the associated methane emissions, whilst providing low carbon 'green' electricity (in accordance with the Energy White Paper 2007, the UK Renewable Energy Strategy (2009), and National Policy Statements for Energy (2011)).

19.9 **Fuel Sustainability (Generation and Sourcing of the Proposed Fuel Stock)**
Only waste derived fuels processed to meet a pre-determined fuel composition range will be sourced for the proposed development. Waste derived fuels will be made from various sources of processed municipal solid waste, Commercial and Industrial waste and waste wood. All waste derived fuels will be processed offsite to extract recyclable material, screened and delivered to site via HGVs.

Although it is not yet possible to determine the source of fuel for use at the proposed development, however there are commercial and environmental considerations which suggest that the majority of the fuel would be derived from local and regional sources, thereby helping to maintain the region's self-sufficiency in the management of waste and to minimise transportation distances for fuel. The Local Planning Authority is in support of locally sourcing fuel to reduce the carbon footprint.

19.10 **Transport**
During the demolition and construction phase, the Applicant will apply the following mitigation measures in respect of the local highways:

- A CEMP will be prepared by the Contractor and submitted to the Local Planning Authority for approval prior to the commencement of any demolition or construction work on site; all travel to site by staff will be managed through the CEMP, including management of parking, provision of minibuses and a car share scheme.
- All construction traffic entering and leaving the Site will be closely controlled and will be managed through the CEMP. Vehicles making deliveries to site or removing spoil or demolition material etc. will travel via designated routes which will have been previously agreed with the Council and other relevant bodies to minimise the impact of traffic.
- Limitations on construction shift start/finish times will be identified such that the addition of the construction traffic will not result in traffic flows exceeding the current peak hour flows.
- Deliveries will be phased on a 'just in time' basis where possible. This will minimise travel time and potential congestion around the site.
- The access and egress of demolition/construction traffic will be carefully planned to minimise effects on the surrounding highway and local road users. The increase in construction traffic flows will be managed where possible to minimise the effect on the surrounding highways and all local road users, in particular the morning and evening commuter peak periods. Discussions will be held with the Council to agree a safe site access strategy in advance of site works commencing, and prior to each phase of the works.
- Construction staff will be encouraged to travel to and from the site by sustainable means. In particular, emphasis will be given to car sharing and the use of minivans. Parking within the site for demolition/construction staff will be managed to minimise overspill parking on the surrounding side

roads. A Workplace Travel Plan will be produced for the site, which will cover both the demolition/construction and operational phases; and

- Pedestrian access to the Site will be segregated from vehicular traffic at all times, with clear signage to maintain the safety of the site and the general public.

19.11 During the operational phase, the Applicant will apply the following mitigation measures in respect of the local highways:

- A previous condition of the operation of the SHP site outlined pre-determined routes and a maximum number of HGV trips per day. The analysis of the traffic resulting from the proposed development indicates traffic movements, including remaining operational plant, will be less than those currently permitted.
- A comprehensive Workplace Travel Plan will be prepared for the proposed development and submitted to the Council. The Travel Plan will identify measures to be incorporated into the design of the development to encourage more sustainable means of transport.
- The Applicant will commit to all operational HGV's delivering the site being EURO VI compliant by the year of operation (2019).
- The avoidance of peak hours (07:30 to 09:30 and 16:30 to 18:30) will minimise idling traffic and maximise average speed, which has the potential to reduce CO2 emissions from delivery vehicles.
- At the main access point on Edinburgh Avenue, the entrance barrier will be relocated further into the Site to avoid queuing on the road due to HGVs protruding, and the access and the exit on Edinburgh Avenue will become yellow box junctions to prevent HGVs from being blocked while accessing/egressing the site, therefore preventing further queuing at these junctions; and
- To increase the safety of vulnerable road users, HGV operators will be encouraged to use safety equipment such as sidebars, blind spot cameras, audible 'turning left' warnings and reversing beeps for all HGVs accessing the site.

19.12 An assessment of carbon emissions arising from the transport of waste derived fuels and other raw materials to the site and waste arising from the site has been undertaken and is provided in the Climate Change Assessment.

It is worth noting however that NPS EN-1 and EN-3 outline the need for additional generating stations in the UK, and hence local planning authorities (in this case, SBC) do not need to take into account the carbon emissions associated with these developments.

19.13 Climate Change

The proposed development will make a positive contribution toward addressing a number of challenges, namely:

- The UK Government's climate change commitments which necessitate achieving ambitious reductions in greenhouse gas emissions, principally carbon dioxide (CO2);
- Security of national electricity supply through having a mix of energy generating technologies and a diverse range of fuel sources;
- Maximising energy recovery from waste derived fuels in the form of low carbon (non fossil fuel) electricity and heat that will supply businesses in the local area;
- Providing local authorities with an outlet for processed municipal solid waste in the

form of waste derived fuels;

- Complementing recycling initiatives by accepting waste after these initiatives have been carried out, thereby forming part of an integrated waste management system;
- Positive diversion of waste materials that may otherwise be disposed of to landfill, achieving reductions in greenhouse gas emissions (including methane) that would otherwise be generated from the breakdown of the waste materials associated with landfill;
- Utilising a cooling heat and power network in line with the UK Government's commitment towards developing heating and cooling networks; and
- Forming part of the continued modernisation of the Slough Trading Estate and green energy credentials of the site.

- 19.14 As such, it is considered that the need and requirement for the proposed development has been demonstrated in line with Central Government's objectives to achieve renewable energy targets, with lower greenhouse gas emissions than many existing energy technologies (such as coal and gas).

20.0 Electronic Interference

- 20.1 Paragraph 44 of the NPPF states that *"Local planning authorities should ensure that: ...they have considered the possibility of the construction of new buildings or other structures interfering with broadcast and telecommunications services"*.

- 20.2 Policy EN6 (Interference with Telecommunication Signals) of Slough's Local Plan relates specifically to broadcasting interference due to new structures, stating that *"Where it is anticipated that disruption to television services and other telecommunications services will be a problem either because of: a) the proposed development's height or mass... planning permission will only be granted subject to a condition requiring the developer to take appropriate measures to restore any loss of quality of reception"*.

- 20.3 The introduction of new structures of significant height and bulk into a residential environment can cause disruption to both terrestrial and satellite TV reception. Principles of radiowave propagation from transmitting to receiving antennae (both terrestrial and satellite) are used to study the likely significant effect of the proposed development on TV reception in the area surrounding the site. This is because these signals use frequencies that travel more or less in straight lines and hence can be blocked by the introduction of new buildings.

- 20.4 Within Chapter 15 of the Environmental Statement, URS have assessed the impact of the proposed development by a combination of desk-based calculations and an on-site inspection of domestic aerial installations in the surrounding area (terrestrial and satellite). The highest element of the proposed development considered for the purposes of the assessment is the boiler house, which is 48m above ground level. The existing or proposed stacks will not have an effect for this assessment as they are slender and TV signals will diffract around the edges before meeting up again a few metres away, therefore creating no shadow.

- 20.5 The potential effect on the reception of mobile telephone signals, wireless networks and emergency service communications would be compromised in situations where their transmitting aerials are sited on top of nearby buildings at heights less than those of the proposed development. It has been confirmed that no such aerials

have been found, either from a search of the Ofcom database or during the site visit undertaken as part of the assessment, but SEGRO, has noted that they operate a security pager system throughout the industrial estate. Therefore the operating parameters of this system have been investigated by URS. The only other services deemed to be at risk of degradation are digital terrestrial and satellite TV reception, this is discussed in further detail below.

20.6 The cumulative effects have also been assessed with other proposed developments in the area and it has been concluded that there will be no cumulative effect.

20.7 *Demolition and Construction*

Interference caused by temporary structures, such as cranes and scaffolding, used during demolition and construction works is temporary and unlikely to affect TV and radio signals due to their slender nature and the ability of the signals to diffract around these structures.

To avoid disruption to services carried by communication cables (copper and fibre) to neighbouring properties (such as accidental cutting of cables during demolition and construction phases), the Applicant will obtain information on any cable routes that run across the site from the Service Providers prior to demolition or enabling works. This information can then be used by the Contractor carrying out these works to avoid any potential disruption.

20.8 *Completed and Operational Development*

Chapter 15 of the Environmental Statement identifies that 22 dwellings could potentially have their TV signal adversely affected as a result of the proposed development if they are using terrestrial TV signal, although if they are using cable or satellite TV signals then no dwellings would be at risk.

20.9 *Mitigation*

No specific mitigation was identified for incorporation into the design of the scheme as the proposed 48m tall boiler house would have to be reduced by approximately 8m in height and the tipping hall bunker would have to be reduced in width to that of the boiler house, from 60m to 46m to prevent no loss of reception to local viewers. Due to the specific design parameters of the internal equipment required for the proposed development, a reduction in the massing of the buildings of this magnitude is not feasible and the Applicant has demonstrated the requirement for the proposed development of this scale and mass to ensure that operational functions can be delivered.

The Local Planning Authority must weigh the harm and benefits of the proposal in line with the NPPF when considering the proposed development. It is considered that harm of the proposal can be adequately mitigated. As such the Applicant will ensure that those dwellings with adversely affected terrestrial TV reception, mitigation would include upgrading the existing aerials by increasing their height and/or gain, using signals from the Hannington transmitter which will be received from the southwest, or providing a non-subscription satellite service which is available from either the BBC and ITV ('Freesat') or 'Sky' for a one-off cost. This will be secured by means of a condition.

SEGRO operates a security pager system within the trading estate. In the event

that elements of the proposed development are found to block parts of the service area of the security pager system the Applicant will provide a suitable location (on the roof of one of the buildings) for a repeater transmitter, if necessary. It is expected that this would fully mitigate any effects on this local service.

20.10 The mitigation measures are expected to provide TV reception of at least the same quality as that previously enjoyed by those affected households prior to the implementation of the proposed development, as such this is considered to be acceptable.

21.0 Planning obligations

A Section 106 Agreement will be undertaken, whereby the Applicant commits to specified planning obligations in respect of:

1. Traffic safety improvement measures, namely improved junction safety including carbon reduction measures relating to cycle routes and improved street lighting;
2. New air quality monitoring measures in Slough and Burnham Beeches including committed sum for annual management;
3. Various tree and landscaping schemes across nearby residential areas and the Slough Trading Estate including a committed sum for future maintenance;
4. Use of site operational HGV traffic on Slough transport network, incorporating existing planning permission P/0600/001 dated 09.12.97 and section 36 consent AAH/1/88 dated 29.03.99;
5. Compliance with Euro VI standard for all HGV Waste Derived Fuels vehicle deliveries to the site;
6. Reasonable endeavours to maintain and expand Combined Heat and Power infrastructure network;
7. Concrete cooling towers to be repainted in a colour that meets the Council's renewal requirements;
8. Requirement to review approved traffic arrangements in the event of exceeding the agreed Traffic Movement Ceiling;
9. Variation of Section 106 Legal Agreement associated with P/6000/001 and consideration given to any change arising from 987/19;
10. Provision and review of the Travel Plan;
11. Provision of Construction Environmental Management Plan;
12. Apprenticeship scheme/employment and skill plan sponsored by main Slough Multifuel construction contractor and/or site employment.

22.0 **Process**

In dealing with the application, the Local Planning Authority has worked with the Applicant in a positive and proactive manner. The development is considered to be sustainable and in accordance with the requirements of the National Planning Policy Framework.

23.0 Summary and Conclusion

23.1 The selected design is for a generating capacity of up to 50 megawatts utilising up to 480,000 tonnes of waste derived fuels, there will no hazardous waste.

Overall it is considered that there are no policy grounds to object to the principle of

the proposed development as a Multifuel Combined Heat and Power Generating Station, given that it has always historically been a power station site. The Local Planning Authority has assessed the proposal in line with the waste hierarchy and relevant national policy on energy recovery and considers that the proposal can be appropriately assessed as recovery. The proximity of the site to existing industrial properties within the Trading Estate provides opportunities for the supply of heat and energy from the proposed facility with sustainability benefits.

The environmental impacts of the proposed development have been assessed in the Environmental Statement and in this assessment it is considered that the impacts of the development are not significant and would not result in cumulative impacts that would justify refusal of the application from a land use planning perspective.

A Demolition and Construction Method Statement and Construction Environmental Management Plan will be prepared and approved by the Local Planning prior to the onset of the demolition and construction phase to maintain consideration of environmental effects beyond the planning stage of the proposed development. This will incorporate the commitments made within the Environmental Statement with regard to mitigating against potentially adverse effects throughout the site enabling, demolition and construction phase. Further controls would be in place through other regulations, primarily the Environmental Permitting Regulations.

In terms of potential for amenity impacts the site benefits from an industrial setting and significant separation distance to sensitive receptors. It is considered that subject to the imposition of the proposed mitigation measures and conditions there should be no adverse amenity impacts to justify refusal of this application having regard to the NPPF, the Core Strategy and The Local Plan.

It is considered that the proposed development improves on the visual appearance of the existing site, particularly from the southern view, by removing plant and buildings that have reached the end of their life and replacing these with new cohesively designed and integrated structures. While the building and in particular the stacks would be visible although views of the proposed development would be softened to some extent by existing industrial development and proposed landscaping.

Change will undoubtedly occur and proposed development will certainly not hide in the landscape, but its design will ensure that it becomes a landmark feature that demonstrates the importance that Slough attaches to generating renewable energy, combating climate change and embracing sustainable waste management practices.

- 23.2 The proposal has been considered against relevant development plan policies, and regard has been had to the comments received and letters of objection received from residents living near the site, and all other relevant material considerations.

24.0 PART C: RECOMMENDATION

Having considered the relevant policies set out below, the representations received from consultees and all other relevant material considerations, it is recommended that the application be delegated to the Acting Planning Manager for formal determination following finalising conditions and completion of a Section 106 Agreement.

PART D: LIST OF CONDITIONS – HEADINGS

1. Time limit in which development must commence
2. Implemented in accordance with approved plans
3. Requirement for details of design
4. Means of access
5. Soil contamination
6. Protection of watercourses
7. Television reception
8. Surface water drainage
9. Air quality monitoring
10. Dust suppression during construction and operation
11. Piling details
12. Vibration
13. Noise monitoring during construction and operation
14. Maximum limits of noise levels
15. Requirement to deposit fuels only within the tipping hall
16. Lorry sheeting
17. No water, effluent or drainage discharged into the public highway
18. No waste transfer operations place on site
19. Odour management
20. Waste hierarchy
21. Details of external lighting
22. Flood risk
23. Protected species within the site
24. Fuel storage bunkers
25. Cycle parking
26. Local liaison group
27. Temporary construction compound
28. Green walling and other on site landscaping
29. Maximum height of buildings and stack
30. Traffic movements during operational development
31. Maximum traffic movement annual limit
32. Framework construction environmental management plan
33. Demolition and Construction Method Statement
34. Carbon filters abatement system/other appropriate technology
35. Notify Defence Geographic Centre

Informatives:

1. Aviation Promulgation.
2. Crane operations.