

Date: 21 December 2021
Your Ref: EN010114
Our Ref: 14592



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Dear Liam,

KEADBY 3 CARBON CAPTURE POWER STATION PROJECT – APPLICATION BY KEADBY GENERATION LIMITED FOR AN ORDER GRANTING DEVELOPMENT CONSENT FOR THE KEADBY 3 CARBON CAPTURE POWER STATION – LAND AT THE KEADBY POWER STATION SITE, TRENTSIDE, KEADBY, SCUNTHORPE, LINCOLNSHIRE, DN17 3EF

THE PLANNING ACT 2008

THE INFRASTRUCTURE PLANNING (EXAMINATION PROCEDURE) RULES 2010

The Applicant writes in response to the 'Rule 8' letter dated 14 December 2021 in which the Examining Authority has requested SoCGs with specific parties, Comments on Relevant Representations, an updated Application Guide, and Accompanied Site Inspection suggestions, to be submitted by Deadline 1.

Documents Submitted at Deadline 1

The Applicant requests that the Examining Authority accepts the following documents submitted in advance of Deadline 1:

- Document 1.2 – Application Guide [Revision 2.0];
- Document 3.1 – Book of Reference (Parts 1-5) [Revision 2.0];
- Document 4.2 – Land Plans (Key Plan and Sheets 1-3) [Revision 2.0];
- Document 4.5 – Crown Land Plan (Key Plan and Sheets 1-3) [Revision 2.0];
- Document 5.12 – Habitat Regulations Assessment Appropriate Assessment [Revision 2.0] [previously known as Habitats Regulations Assessment Screening Report];
- Document 8.1 – Statement of Common Ground with North Lincolnshire Council;
- Document 8.2 – Draft Statement of Common Ground with Environment Agency;
- Document 8.3 – Statement of Common Ground with Natural England;
- Document 8.4 – Statement of Common Ground with Marine Management Organisation;
- Document 8.5 – Statement of Common Ground with Historic England;
- Document 8.6 – Statement of Common Ground with National Grid Carbon Limited (part of National Grid Ventures);
- Document 8.7 – Statement of Common Ground with National Grid Electricity Transmission and National Grid Gas;

Partners

R J Greeves BSc (Hons) MRICS
G Bullock BA (Hons) BPL MRTPI
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- Document 8.8 – Statement of Common Ground with Canal and River Trust;
- Document 8.9 – Statement of Common Ground with Network Rail;
- Document 8.10 – Statement of Common Ground with Maritime and Coastguard Agency;
- Document 8.11 – Statement of Common Ground with Trinity House/Associated British Ports;
- Document 8.12 – Statement of Common Ground with Northern PowerGrid;
- Document 8.15 – Statement of Common Ground with National Highways;
- Document 8.16 – Draft Statement of Common Ground with Severn Trent Water; and
- Document 9.1 – Applicant’s Comments on Relevant Representations & Additional Submissions.

The Book of Reference update captures a limited number of factual updates where ongoing diligent inquiry between the submission of the application in June and the present date has identified that information held about the existing nature of rights requires updates (e.g. apparatus; additional rights identified; a change in mortgagee; a title transfer).

The Book of Reference, and the Land Plans update (and consequential updates to Crown Land Plans), corrects the nature of rights sought at plots 43, 56, and 59 lying within the 132kV cable route, Work No. 3B.

A small number of SoCGs requested by the ExA for Deadline 1 are not provided for the following reasons:

- The Health and Safety Executive wrote to the Applicant on 21 December 2021 to confirm that they did not advise against the proposal nor raise any representations in regards to COMAH, explosives or hazardous substances consent and that they therefore have no comments to make or discussions to undertake such that a Statement of Common Ground is necessary. A copy of their email setting out their position on the matter is appended to this letter.
- As outlined in the Applicant’s Procedural Deadline letter (PDA-001), Doncaster Metropolitan Borough Council have been offered a SoCG. They have responded to us in email correspondence 06/12/2021 (principal planning officer) “we are of the view that the council does not need to agree a SoCG. The concern raised is already covered in the information submitted.”
- A SoCG (Document 8.13) has been issued in draft to the UK Health Security Agency (formerly Public Health England) but their review comments are outstanding and therefore the parties have agreed this will be submitted at Deadline 2.

In addition the Applicant is voluntarily authoring SoCGs with Keadby with Althorpe Parish Council (Document 8.14) and Isle of Axholme and North Nottingham Internal Drainage Board (Document 8.17) to be submitted at Deadline 2.

Updated Guide to Application

All of the above documents are referenced in the enclosed updated Application Guide (Document 1.2 – Application Guide – Revision 2.0).

Accompanied Site Inspection Suggestions

The Examining Authority has requested the submission by the Applicant and Interested Parties (IPs) of suggested locations for the ExA to include in any Accompanied Site Inspection (ASI). The Applicant has reviewed the notes of Unaccompanied Site Inspection 1 and Unaccompanied Site Inspection 2 (EV-001 and EV-002) and would like to suggest the locations in the table below. The Applicant has made suggestions for locations that are likely to be capable of being fitted into a single day ASI. The Applicant wishes to attend any ASI that is carried out by the examining authority.

The Applicant has previously recorded high resolution aerial drone footage for large parts of the Site as part of the Applicant's pre-application consultation which includes Computer Generated Images of how the Proposed Development may look once built. The Applicant can provide a hyperlink to this content for information purposes to your team to obtain an understanding of the extent and nature of the footage and therefore whether it would be of assistance to submit it into Examination.

LOCATION (EASTING, NORTHING)	REASON FOR INCLUSION	INCLUDED IN USI CARRIED OUT BY EXA?
Viewpoint 1: Chapel Lane West, Keadby (483210 , 411880)	This is considered a representative viewpoint from residential receptors in close proximity to the Proposed Development Site, within Keadby. The Environmental Statement has concluded significant adverse visual effects for residents from this viewpoint during construction, operation and decommissioning of the Proposed Development. This is due to the introduction of built structures against the skyline, making them more prominent and extending the amount of view which includes large scale development. Mitigation opportunities are limited due to the size and scale of the Proposed Development. A photomontage demonstrating the view of the Proposed Development, along with Keadby 1 and 2 Power Stations is provided as Figure 14.19: Viewpoint 1 Photomontage of ES Volume III (APP-149).	Yes
Viewpoint 2: Gate Keepers Residence, Vazon Bridge (482490 , 411510)	This is considered a representative viewpoint from residential and recreational receptors south of the Proposed Development Site. The Environmental Statement has concluded significant adverse visual effects for residential and recreational receptors from this viewpoint during construction, operation and decommissioning of the Proposed Development. This is due to the introduction of built structures against the skyline, making them more prominent and extending the amount of view which includes large scale development. Mitigation opportunities are limited due to the size and scale of the Proposed Development. A photomontage demonstrating the view of the Proposed Development, along with Keadby 1 and 2 Power Stations is provided as Figure 14.20: Viewpoint 2 Photomontage of ES Volume III (APP-150).	Yes
Viewpoint 4: Public Right of Way (KEAD9 and KEAD10), North	This is considered a representative viewpoint from recreational receptors in close proximity to the Proposed Development Site, to the north of Keadby. The Environmental Statement has concluded significant adverse visual effects for users of the PRoW from this	Yes

of Keadby (483220 , 412380)	viewpoint during construction, operation and decommissioning of the Proposed Development. This is due to the introduction of built structures against the skyline, making them more prominent and extending the amount of view which includes large scale development. Mitigation opportunities are limited due to the size and scale of the Proposed Development. A photomontage demonstrating the view of the Proposed Development, along with Keadby 1 and 2 Power Stations is provided as Figure 14.21: Viewpoint 4 Photomontage of ES Volume III (APP-151). This viewpoint in particular provides a clear and direct view of all three existing/ proposed developments at Keadby Power Station.	
Viewpoint 6 Trunk Road, Keadby (483210 , 409770)	This is considered a representative viewpoint from residential receptors with long distance views of the Proposed Development. The Environmental Statement states that the visual susceptibility to change at Viewpoint 6 is high. Furthermore, the ES concludes the significance of effect on Viewpoint 6 at operation will be moderate adverse.	Yes
Viewpoint 11: Public Right of Way (BURT171) Accessed off Chafer Lane, Burton Upon Stather (486790 , 417360)	This is considered a representative viewpoint from recreational receptors with long distance views of the Proposed Development. The location of this receptor is within the proposed extension area to the Lincolnshire Wolds Area of Outstanding Natural Beauty (AONB). This viewpoint has been considered and assessed within Chapter 14: Landscape and Visual Amenity (ES Volume I) (APP-057). The construction of the Proposed Development would result in very limited perceptible change to the landscape character and tranquility of the proposed AONB extension, as reported in the ES as a minor adverse (not significant) effect during construction and operation. A photomontage has not been included for this viewpoint; however, Figure 14.16: Viewpoint 11 of ES Volume III (APP-146) illustrates the view towards the Proposed Development Site with the location labelled.	Yes
Mabey Bridge over Hatfield Waste Drain and A18 junction (480330 , 410030. Park safely at 480388 , 410244 then walk to location)	The permanent replacement of this existing bridge with a similar bridge is part of Work No. 9B. The new vehicular access to the A18, and the improvement of the existing track, is Work No. 8A. These are likely to be delivered early in the construction of the Proposed Development. This location also allows views of Gatehouse and Layby (Work No. 8B), the existing skew bridge east of Mabey Bridge (also part of Work No. 9B), the temporary construction and laydown area in association with the replacement of the private bridge in Work No. 9B (Work No. 9C) and Landscaping and Biodiversity Management and Enhancement Area (Work No. 11A).	Partially – parked in lay-by nearby off A18.
North Pilfrey Bridge (481150, 411410. Park safely at 481128, 411488 then walk to location)	The continued use of this existing SSE owned bridge over the canal and railway line, for construction and operational traffic for the Proposed Development, was presented as an option at our Stage 2 pre application consultation before being chosen by the Applicant. Ongoing maintenance/improvements to its road surface are provided for within Work No. 8A. SSE has used the bridge for the construction of Keadby Windfarm and more recently, Keadby 2 Power Station. Views of certain Temporary Construction Laydown	No – not publicly accessible.

	Areas (Work No. 9A) and Landscaping and Biodiversity Management and Enhancement Area (Work No. 11A) can be obtained from this location.	
Ash Mound (481690, 412180. Park safely at 481128, 411488 then taken in 4x4 vehicles to location)	This established and vegetated mound of pulverised fuel ash (PFA) has vehicle tracks and can safely be accessed using 4x4 vehicles driven by SSE/Siemens personnel. There may be limitations on the numbers of people who can simultaneously be transported to this location. The mound offers views of the surrounding landscape and existing power infrastructure (wind farm, National Grid substation, existing Keadby 1 and 2 stations), and allows an understanding of large parts of the Proposed Development site including the CCGT Plant (Work No. 1A), CCGT Cooling Infrastructure (Work No. 1B), Carbon Capture Plant (Work No. 1C), Above or Below Ground Connection to National Grid 400kV Substation (Work No. 3A), Electrical Cable Works to 132kV Northern Powergrid Substation (Work No. 3B), Cooling Water Discharge Pipeline (Work No.5), Towns Water Connection (Work No. 6), Carbon Dioxide Conditioning and Compression Facilities (Work No. 7A), National Grid High Pressure Carbon Dioxide Apparatus (Work No. 7B), emergency access route (Work No. 8C), certain Temporary Construction and Laydown Areas (Work No. 9A), Landscaping and Biodiversity Management and Enhancement Area (Work No. 11A) and Boundary Treatment (Work No. 11B).	No – not publicly accessible.
Ealand Road (482360, 411610. Park safely at 482523, 411584 then walk to location)	Located to the west of the existing Keadby Power Station and north of North Soak Drainage. This would principally be used for the abnormal load haul route during construction (Work No. 10A). The location also allows views of the Natural Gas Reception Facility (Work No. 1D), Generating Station and Supporting Uses (Work No. 1E), National Grid Gas Natural Gas Compound (Work No. 2A), Undertaker Natural Gas Compound (Work No. 2B), Canal Water Supply Connection Works (Work No. 4A).	
Keadby 2 canal water abstraction intake (482752, 411509. Park safely at 482523, 411584 then walk to location)	The Keadby 3 preferred cooling water intake (Work No. 4A) would be situated adjacent to the (similar) Keadby 2 intake structures. The intake structures are surrounded by paling fencing.	No - not publicly accessible.
Locations along Trent Side, B1392 (483510, 411620 to 483640, 412220)	The B1392 runs North (adjacent to the River Trent) and connects to Trent Road which provides direct access to the Proposed Development site. Views of River Water Supply Connection Works (Work No. 4B), Cooling Water Discharge Pipeline (Work No. 5) and Temporary Haulage Route (Work No. 10A) can be obtained from here.	No - not publicly accessible.
Railway Wharf (483466, 411451. Park safely near 483510, 411620 and walk to location).	Railway Wharf is proposed to be used temporarily for the construction of the Proposed Development (Work No. 10B) for the placement of mobile cranes to offload larger construction components from waterborne freight barges. It was previously used (and improved) for similar purposes for the Keadby 2 project.	

Bonnyhale Road (480420, 411210)	Bonnyhale Road is located west of the Keadby site and connects to Ealand and will allow more distant westerly views of the Proposed Site from the direction of Ealand. This is proposed for a small number of abnormal indivisible loads as shown in our Framework Construction Traffic Management Plan. From approximately this location eastwards the road is not open to the public.	No – not publicly accessible along its whole length.
PRoW (CROW 14) south of Eastoft Road, Crowle (478393, 412754)	The view from the PRoW is considered a recreational receptor with long distance views of the Proposed Development.	No.
PRoW (BELT 26), south of the A18 (480073, 408474)	The view from the PRoW is considered a recreational receptor with long distance views of the Proposed Development.	No.

Other Matters

The Rule 8 letter also invited notifications of the wish to speak at an Open Floor Hearing or Compulsory Acquisition Hearing. If any are to be held, the Applicant would wish to attend.

Name Change

We have made a minor adjustment to the project name for consistency with the (separate) submission to the Department of Business, Energy and Industrial Strategy competition that the Applicant described during the Preliminary Meeting. The project is now known as the 'Keadby 3 Carbon Capture Power Station' and this is shown on new documents from the Applicant going forwards.

We would therefore be grateful if the Planning Inspectorate project page can be updated from 'Keadby 3 Low Carbon Gas Power Station Project' to 'Keadby 3 Carbon Capture Power Station'.

We are not proposing adjustments to the name of the draft order which remains 'The Keadby 3 (Carbon Capture Equipped Gas Fired Generating Station) Order'.

Should you have any questions with regard to the Application or this Deadline 1 submission package, please do not hesitate to contact Colin Turnbull at this office using the details provided.

Yours sincerely,



DWD

For and on behalf of Keadby Generation Limited

Appended:

Email from the Health and Safety Executive

From:
To:
Cc:
Subject: CEMHD4 - NSIP - Application by Keadby Generation Limited for an Order Granting Development Consent for the Keadby 3 Low Carbon Gas Power Station Project
Date: 21 December 2021 13:03:10
Attachments: [image001.png](#)

Hello

HSE's response is as follows:

HSE has a limited role in the NSIP process. Please see [Land use planning: What is HSE's role? - HSE:](#)

In this case, from a land use planning perspective HSE didn't advise against the proposal nor raise any representations; therefore from the land use planning perspective we have no comments to make or discussions to undertake on a statement of common ground.

We also did not make any representation in regards to COMAH, explosives or hazardous substances consent. Therefore, we have no comments to make or discussions to undertake on a statement of common ground in these areas.

HSE remaining interests will relate to occupational health and safety during the construction and operation of this Power Station. We are not be involved in this activity until these phases start and detailed operational health and safety information becomes available.

Kind regards

Divisional Support Team
CEMHD
1.2 Redgrave Court
Bootle
Tel:

PLEASE NOTE: My working days are now Wednesday, Thursday and Friday

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The current COVID 19 crisis is making receipt of, and access to, post extremely problematic. HSE would be grateful if you could avoid sending hard copy mail wherever possible and instead send electronic versions.

Please let us know by phone or email of any instances where this is not possible and hard copy mail needs urgent attention.