



Marine Management Organisation

Marine Licensing
Lancaster House
Hampshire Court
Newcastle upon Tyne
NE4 7YH

T +44 (0)300 123 1032
F +44 (0)191 376 2681
www.gov.uk/mmo

Keadby 3 Case Team
Case Team
Planning Inspectorate
keadby3@planninginspectorate.gov.uk

(Email only)

MMO Reference: DCO/2020/00002
Planning Inspectorate Reference: EN010114

21 December 2021

Dear Sir/Madam,

Planning Act 2008, Proposed Keadby Low Carbon Gas Power Station

Deadline 1 Submission

On 28 June 2021, the Marine Management Organisation (the “MMO”) received notice under section 56 of the Planning Act 2008 (the “PA 2008”) that the Planning Inspectorate (“PINS”) had accepted an application made by Keadby Generation Limited (the “Applicant”) for determination of a development consent order for the construction, maintenance and operation of the proposed Keadby Low Carbon Gas Power Station (the “DCO Application”).

The MMO are not requesting to speak at any Issue Specific Hearing(s); Compulsory Acquisition Hearing(s) or at an Open Floor Hearing(s). MMO do not have comments regarding suggested locations for Unaccompanied Site Inspections (USIs) or Accompanied Site Inspections (ASIs). This document comprises the MMO’s comments with regard to Deadline 1.

Yours Faithfully

Nicola Wilkinson
Marine Licensing Case Officer

D [REDACTED]
E [REDACTED] [@marinemanagement.org.uk](mailto:[REDACTED]@marinemanagement.org.uk)

Copies to:
Adam Chumbley (MMO) – Case Manager:
[REDACTED] [@marinemanagement.org.uk](mailto:[REDACTED]@marinemanagement.org.uk)
Lindsey Mullan (MMO) – Senior Case Manager:
[REDACTED] [@marinemanagement.org.uk](mailto:[REDACTED]@marinemanagement.org.uk)



Marine
Management
Organisation

...ambitious for our
seas and coasts

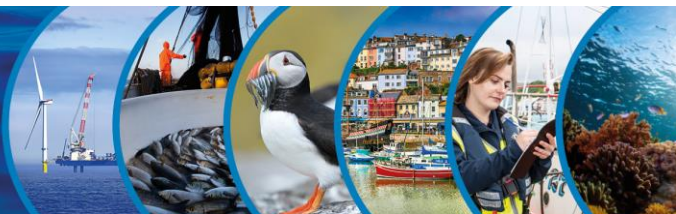


Contents

1 Comments on Relevant Representations3

2 Comments on Additional Submissions3

3 Statement of Common Ground3



1 Comments on Relevant Representations

1.1 RR-010 Natural England

- 1.1.1 The MMO note that Natural England have echoed several of the MMO's concerns within their Relevant Representation and that mitigation to lessen the impacts of the project will be required. The MMO would like to note that if this mitigation falls below mean high water springs (i.e. eels screens & seasonal restrictions), then these need to be secured as conditions within the Deemed Marine Licence (DML). The MMO welcome early engagement with the Applicant and Natural England to ensure any conditions required for the DML are appropriate.
- 1.1.2 The MMO understand Natural England's main concerns to be:
- Disruption of river and sea lamprey migration routes due to cofferdam installation,
 - Loss or modification of designated Special Area of Conservation (SAC) habitat,
 - Air quality impacts to designated sites,
 - Noise and vibration disturbance to Special Area of Protection (SPA)/Ramsar features and;
 - Water quality impacts to SAC/SPA due to cooling water discharge.

2 Comments on Additional Submissions

2.1 AS-001 Canal & River Trust

- 2.1.1 The MMO note that the Canal & River Trust have requested that measures to reduce impacts from cofferdams is detailed via a condition in the Development Consent Order (DCO). They have also requested to be consulted alongside the MMO in relation to Schedule 2 11(b). The MMO recommend that the DML should name the Canal & River Trust as a consultees, and the wording should be amended to reflect this. The MMO can offer assistance in drafting if required.

2.2 AS-002 Environment Agency

- 2.2.1 The MMO note that the Environment Agency (EA) have recommended that a fish mitigation strategy/working method statement is included as part of Requirement 6(2). The MMO agree with the EA that this would be more appropriate to incorporate into the method statement required by Condition 11 within the DML.

3 Statement of Common Ground

- 3.1 On the 08 December 2021 the MMO received a draft Statement of Common Ground (SoCG) from the applicant. The SoCG has been reviewed by the MMO, and while the MMO are satisfied that a number of matters have been resolved, there are still the following outstanding concerns. The MMO consider these can be resolved during the examination process:



- Approach to assessment of underwater sound effects on fish, in the event that a cofferdam in the River Trent is required; and
- Scour, in the event that a cofferdam in the River Trent is required.

The MMO look forward to progressing the SoCG with the applicant as the examination progresses.

