



Planning Inspectorate

Keadby Next Generation Power Station – EN0110001

Keadby Next Generation Limited

Section 51 advice regarding draft application documents

Issued on 16 July 2025

On 6 June 2025 Keadby Next Generation Limited submitted the draft documents listed below for review by the Planning Inspectorate as part of its of its ['Pre-application Service'](#).

1	Draft Development Consent Order and accompanying	2	dDCO Drafting note
3	Explanatory Memorandum	4	Funding Statement
5	Land Plans	6	Works plans
7	Book of Reference	8	Habitats Regulations Assessment Appropriate Assessment
9	Environmental Statement Chapter 4 Proposed Development	10	Environmental Statement Chapter 5 Construction Programme and Management

11	Environmental Statement Supporting Draft Figures	12	Consideration of Alternatives and Design Evolution
13	Planning Statement		

The advice recorded in the tables below relates solely to matters raised from The Planning Inspectorate's review of the draft application documents, the documents have **not** been checked for all typographical or cross-referencing errors, the applicant is reminded to undertake such checks prior to submission.. The advice is limited by the maturity of the documentation provided by the applicant and the time available for consideration and is raised without prejudice to the acceptance decision, the decision about admission to the fast track procedure (where relevant) or the final decision about whether development consent should be granted. The applicant has been given the opportunity to comment on The Planning Inspectorate's draft record of advice before it was published.

General	
Ref No.	Comment or question
1.	The applicant is advised to review the draft application documents for any typographical/grammatical/formatting errors prior to the submission of the application.

Draft development consent order (DCO)

Ref No.	Article/ Schedule/ Requirement	Comment or question
1.	Interpretation	Replace all mentions of 'framework' with 'Outline' e.g "framework construction traffic management plan" becomes "Outline construction traffic management plan".
2.	Interpretation	Replace all mentions of 'indicative' with 'Outline' e.g "indicative landscape and biodiversity plan" becomes "Outline landscape and biodiversity plan".
3.	Interpretation	The defined 1991 Act has not got a corresponding article in Part 3 of the DCO explaining "the application of the 1991 Act".
4.	Article 9	Power to remove/use all earth and materials in/or under the street should be added. The applicant should consider adding power to demolish, remove, replace and relocate any street furniture within the street.
5.	Article 10	The following relevant powers should be added: <ul style="list-style-type: none"> • Power to execute and maintain any works to provide hard and soft landscaping • Power to carry out re-lining and placement of road markings • Power to remove and install temporary and permanent signage
6.	Article 10	The 28 days' notice to the street authority may be too restrictive, the applicant is advised to discuss with the relevant street authority in advance of submission, matters relating to technical specifications and any necessary inspections.
7.	Supplemental Powers	Since series of drainage works are listed in Schedule 1, maintenance of drainage works should be added.
8.	Schedule 3	As there are highway works which may affect the public right of way, the following articles should be included: <ul style="list-style-type: none"> • Temporary restriction and stopping up of public rights of way powers

Draft development consent order (DCO)		
Ref No.	Article/ Schedule/ Requirement	Comment or question
		<ul style="list-style-type: none"> • Temporary restriction and stopping up of the use of streets powers
9.	Schedule 3	<p>Street works should be separated as follows:</p> <ul style="list-style-type: none"> • Streets subject to permanent street works • Streets subject to temporary street works
10.	Other necessary schedules	<ul style="list-style-type: none"> • Streets to be temporarily stopped up or restricted • Public rights of way to be temporarily restricted
11.	Points 8-10	The term 'stopping-up' is a permanent act. Therefore the applicant should consider an alternative term, which would also be easier for any AP/IP to understand, for example 'temporary closure'.

Draft DCO explanatory memorandum		
Ref No.		Comment or question
1.		<p>The applicant may wish to reassure itself during quality assurance checks that all cross-referencing and other information is accurate and consistent. The following examples have been picked up during the review of the draft documents:</p> <ul style="list-style-type: none"> • Paragraph 4.1 refers to the 'AFPF Regulations'. This should be referring to the 'APFP Regulations' • Paragraph 5.2(g) refers to Article 6 of the dDCO being (Benefit of the Order). This should be Article 5. Similarly Article 8 is referred to as (Consent to transfer benefit of the Order) which should refer to Article 7.

Draft DCO explanatory memorandum

Ref No.		Comment or question
		<ul style="list-style-type: none"> Paragraph 5.10 refers to Article 11 as (Power to alter layout, etc... of streets). This should be Article 10. Paragraph 5.52 refers to Schedule 9 in the dDCO as being (Procedure for the discharge of requirements). This should be Schedule 8. Paragraph 8.1 refers to Schedule 3 as (Streets and Street works). For consistency, this should be referred to as 'Streets subject to street works' as noted in the draft Order.

Draft sample works plans and land plans

Ref No.	Plan Name and Ref	Comment or question
1.	Land plans	Plot numbers do not indicate which sheet of the plans the plot can be found on. To assist interested parties it is recommended that plot numbers include the sheet number i.e 01-010
2.	All plans	A number of landmarks are not listed listed i.e. road names, building names, river/lake names. This makes it unclear where each area is or what the land features are.
3.	Land plans Sheet 2 plot 90, 91, 94	It might be helpful to the public if this section was magnified, it is difficult to see the shading of the plot.
4.	Land plans Sheet 2 plot 89	The description of the plot within the BoR does not match the location of the plot. BoR states north of the road but the plan identifies the plot being south of the road

Draft sample works plans and land plans

Ref No.	Plan Name and Ref	Comment or question
5.	Land plans	Ensure descriptions of plots listed in the BoR accurately describe what the plot contains i.e plot 120 does not state that it contains un-named private roads
6.	Land Plans	Some plots have the incorrect shading such as plots 165 and 167. For some plots it is also difficult to identify what colour shading has been used.
7.	Works Plans	A scale of 1:3000 is used in the work plans. These need to be a minimum of 1:2500.
8.	Works Plans	A key plan is required as there are more than three sheets.
9.	Works Plans	Plans don't state whether they are A0/A1 size.
10.	Works Plans Sheet 9 (Work No. 4B)	The orange pattern used to identify the plot does not match the pattern used in the legend.
11.	Works Plans	The 'notes' on the plans use numbers but the dDCO uses roman numeral. Eg Sheet 2 (work number 1B) uses '1.1 Cooling Tower' for the plans but '(i) hybrid cooling towers' on the dDCO.
12.	Works Plans	Language used in descriptions differs slightly from the dDCO. Making these cohesive would approve readability.

Draft habitats regulations assessment (HRA) report

Ref No.	Paragraph/ Section	Comment or question
1.	Table 1	The spread of invasive non-native species is not listed as a threat/ pressure of relevance. The applicant is advised to consider and explain the relevance (or not) of this potential pathway.
2.	Figures 1 and 2	Figures 1 and 2 are referred to (see paragraph 2.6.6) but are not included in the document, or separately as part of the bundle of draft documents submitted. Ensure these are included with the application (note APFP Regulation 5(2)(l)(i) requiring a plan with accompanying information identifying any statutory or non-statutory sites or features of nature conservation.

Draft environmental statement (ES) project description chapter(s)

Ref No.	Paragraph/ Section	Comment or question
1.	4.3.3	This paragraph states that the power output is limited to 892MW by the grid connection. Elsewhere the CCGT is described as having a power output of up to 910MW. The applicant is advised to explain this apparent discrepancy.
2.	4.3.26	Reference is made to the “wobble index” – is this an autocorrection of the Wobbe index?
3.	Table 4.1	Table 4.1 (maximum design parameters) sets a minimum finished ground level of +3.0m above ordinance datum (AOD). Paragraph 4.4.8 states that flood resilience measures are proposed that provide a level of resilience of no less than 4.0m AOD. The applicant must establish a maximum finished ground level, and clarify whether the parameters (height in metres above ground level) of the critical operational infrastructure listed in Table 4.1 include the flood resilience measures. As written, it is unclear whether a worst-case envelope has been assessed.

Draft environmental statement (ES) project description chapter(s)

Ref No.	Paragraph/ Section	Comment or question
4.	4.5.3	This paragraph notes the ES chapters for which operations in baseload mode have been considered the worst case in terms of environmental impacts (Air Quality, and Climate Change and Sustainability). The applicant is advised to add a statement to confirm which chapters have applied a dispatchable mode scenario, and why this is considered the worst case for those aspect chapters, and, where relevant, to also note those chapters for which the operating mode makes no material difference to the environmental outcomes.
5.	Figure 3.2	This figure includes a label for the “Sheffield and South Yorkshire Navigation (New Junction and Stainforth and Keadby)”. This figure appears to denote areas that are outside of the proposed development and construction/ operational access, so it is unclear why the label is included. Consider removing this label as it is potentially confusing.
6.	Figure 3.3	Figure 3.3 lacks parts of the site. For example, references in ES Chapter 5 paragraphs 5.4.44 (electrical connection options), 5.4.54 (construction laydown areas, access roads), and 5.4.61 (construction storage areas) cross refer to Figure 3.3 however these parts of the site are absent from the figure. The applicant is advised to consider the list provided of the parts of the site in ES Chapter 4 paragraph 4.2.5 and amend Figure 3.3 accordingly.
7.	Figure 3.3	The applicant is advised to have greater differentiation between the attenuation pond and raw water treatment (both shown in similar shades of pink).

Draft planning statement

Ref No.	Paragraph/ Section	Comment or question
1.		The Inspectorate does not have any comments to make on this document.

Draft book of reference (BoR)

ASE

Ref No.	Page/ Plot Ref	Comment or question
1.	BoR and dDCO	The Inspectorate does not have any detailed comments to make on the draft BoR. However, the applicant is advised to review the draft application documents for any typographical/formatting issues prior to submission.

Draft statement of reasons (SoR)

Ref No.	Paragraph/ Section	Comment or question
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1.		The Inspectorate does not have any detailed comments to make on the draft SoR. However, the applicant is advised to review the draft application documents for any typographical/formatting issues prior to submission; one example of a formatting issue can be seen in Table 7.1.
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Draft funding statement		
Ref No.	Paragraph/Section	Comment or question
1.	General - summary	The funding statement does not appear to meet the expectations set out in the statutory “Guidance related to procedures for the compulsory acquisition of land as it does not clearly demonstrate the likely cost of compulsory acquisition, the cost of the project, and how the applicant can fund it. Whilst understanding commercial sensitivity, it is crucial that the funding statement submitted with the application addresses these matters.
2.	2.5	There is a reference to SSE historically demonstrating effective capital allocation and raising debt, however it is not clear which of these arrangements (or what combination) will be applicable for this application.