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Your Ref: EN0110001

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Dear Ms Hopewell,

## **THE KEADBY NEXT GENERATION POWER STATION**

### **APPLICATION FOR DEVELOPMENT CONSENT UNDER SECTION 37 'APPLICATIONS FOR ORDERS GRANTING DEVELOPMENT CONSENT' OF THE PLANNING ACT 2008 FOR A COMBINED CYCLE GAS TURBINE GENERATING STATION WITH A CAPACITY OF UP TO 910MW ELECTRICAL OUTPUT**

#### **LAND AT, AND IN THE VICINITY OF, THE EXISTING KEADBY POWER STATION (TRENTSIDE, KEADBY, SCUNTHORPE DN17 3EF)**

We are pleased to enclose an application submitted on behalf of Keadby Next Generation Limited (the 'Applicant') (Company number 15866301) for a Development Consent Order ('DCO'), for submission to the Secretary of State (the 'SoS') for the Department for Energy Security and Net Zero ('DESNZ'), under Section 37 of The Planning Act 2008 ('the 2008 Act') in respect of the Keadby Next Generation Power Station.

The Applicant is a subsidiary of the FTSE-listed SSE plc, one of the UK's largest and broadest-based energy companies, and the country's leading developer of renewable energy. The Proposed Development is being developed with Equinor, one of the country's leading energy providers, supplying natural gas, oil and electricity. It is developing multiple low-carbon hydrogen and carbon capture projects in the Humber, working towards transforming the UK's most carbon intensive industrial cluster into a net zero region. Over the last 20 years, the SSE Group has invested over £20bn to deliver industry-leading offshore wind, onshore wind, CCGT, energy-from-waste, biomass, battery-storage, energy networks and gas storage projects. The Applicant is seeking development consent for the construction, operation and maintenance of a combined cycle gas turbine ('CCGT') generating station with a capacity of up to 910MW electrical output with connections for cooling water, electricity, hydrogen, natural gas, and construction laydown areas and other associated development (the 'Proposed Development').

A DCO is required for the Proposed Development as it falls within the definition and thresholds for a 'Nationally Significant Infrastructure Project' (a 'NSIP') under Sections 14(1)(a) and 15(1) and (2) of the 2008 Act, as it is an onshore generating station in England that would have a generating capacity greater than 50MW. As such, a DCO application is required to authorise the Proposed Development in accordance with Section 31 of the 2008 Act. The DCO, if made by the SoS for DESNZ would be known as the 'Keadby Next Generation Power Station Order' ('the Order'). The NSIP and associated development are formally described in Schedule 1 of the **draft DCO (Application Document Ref: 3.1)** and the **Planning Statement (Application Document Ref: 5.5)**.

The Proposed Development is an alternative to the Keadby CCS Power Station, which has already been consented under the 2008 Act pursuant to The Keadby 3 (Carbon Capture Equipped Gas Fired Generating Station) Order 2022, to enable the Applicant to pivot to whichever decarbonisation pathway (Carbon Capture and Storage ('CCS') or hydrogen) becomes technically and commercially viable at the Site first. By obtaining consents for both low carbon CCGT technology options (i.e. CCS-enabled in the form of Keadby 3 CCS Power Station and hydrogen-fired in the form of the Proposed Development) on the Site, SSE can continue to support the UK's security of supply in accordance with Government policy, and be ready to develop a low carbon CCGT as soon as a commercial decision can be made based on market certainty around the availability of either a CO2 pipeline or a hydrogen supply.

The Proposed Development is intended to act as a catalyst for the creation of a 'strong and enduring UK hydrogen economy' as it would establish a hydrogen-ready end-user for a future hydrogen supply chain. The creation of a hydrogen economy is critical in meeting the Government's ambition for 10GW of electricity supply being generated by hydrogen fired power stations. The Proposed Development is located in the Humber Industrial Cluster and will support the Humber Industrial Cluster Plan for decarbonisation of the largest carbon emitting cluster in the UK. The National Policy Statements ('NPS') that have effect for the Proposed Development are the Overarching National Policy Statement for Energy ('EN-1') and the National Policy Statement for natural gas electricity generating infrastructure ('EN-2'). These set out the urgent need and the critical national priority which exist for new low carbon electricity generation capacity and set out the matters which the Proposed Development shall address. The **Planning Statement (Application Document Ref: 5.5)** submitted to support the application sets out the contribution made to this need, confirms the compliance of the Proposed Development with the rest of the policy in these NPSs, and describes the Proposed Development's limited impacts and very clear and tangible benefits.

### The Site

The Order Limits represent the land required for the Proposed Development (the 'Site'). The Site is located within and adjacent to the boundary of the existing Keadby Power Station site near Scunthorpe, Lincolnshire and falls within the administrative area of North Lincolnshire Council ('NLC') (the 'Site'). The Keadby Power Station site currently encompasses the operational Keadby 1 and Keadby 2 Power Stations. The location of the Site, which is approximately centred on national grid reference (NGR) 481961, 412101 is shown on the **Site Location Plan (Application Document Ref: 2.1)**. It is 77.1 hectares (ha) in size and is divided into the following areas of permanent and temporary land use which are described in more

detail in **Environmental Statement Chapter 3: Site and Surrounding Area (Application Document Ref: 6.2.3)**

- Main Site;
- Ancillary Facilities;
- Water Connections;
- Electricity Connections;
- Waterborne Transport Off-loading Area;
- Construction Laydown Areas;
- Access routes (emergency, permanent and construction);
- Connections to Keadby 1 and Keadby 2 power stations; and
- Additional areas for landscaping and biodiversity provision.

### **Proposed Development**

The Proposed Development in summary comprises:

- a high efficiency electricity generating station with a net output capacity of up to 910 megawatts (MWe) designed to run on hydrogen, natural gas or a blend of hydrogen and natural gas (Work No. 1)
- a hydrogen supply pipeline connection (Work No. 2);
- a natural gas supply pipeline connection (Work No. 3);
- electrical connection works (Work No. 4);
- water supply connection works (Work No. 5);
- connections to and use of an existing outfall and associated pipework for the discharge of water (Work No. 6);
- public water supply connection pipeline (Work No. 7);
- new permanent accesses (Work No. 8);
- temporary construction and laydown areas (Work No. 9);
- soft landscaping including planting and biodiversity enhancement measures (Work No. 10);
- an area reserved for carbon capture readiness infrastructure. (Work No. 11).

A more detailed description of the NSIP (Work No. 1), the associated development (Work Nos. 2 - 11) and ancillary works is detailed in Schedule 1 of the **draft Development Consent Order (Application Document Ref: 3.1)** and **Environmental Statement Chapter 3: Site and Surrounding Area (Application Document Ref: 6.2.3)**. Section 1 of the **Planning Statement (Application Document Ref: 5.5)** gives details of the Associated Development required in connection with or subsidiary to the NSIP. The spatial areas within which each of the numbered works are to be built are denoted by the coloured and hatched areas on the **Works Plans (Application Document Ref: 2.3)**. The **Design and Access Statement (Application**

**Document Ref: 5.6)** describes the physical and operational parameters and the design principles which are secured by a Requirement in Schedule 2 of the **Draft Development Consent Order (Application Document Ref: 3.1)**.

### Pre-Application Consultation

The Applicant has had careful regard to the pre-application consultation requirements of the 2008 Act, the guidance on pre-application consultation issued by the Planning Inspectorate, responses received during preapplication consultation and its pre-application discussions held with the Planning Inspectorate, as required by Section 50(3) and 55(4) of the 2008 Act.

As required by Section 37(3)(c) of the 2008 Act, the Application is accompanied by a Consultation Report (**Application Document Ref: 5.1.1**) and its accompanying appendices (**Application Document refs: 5.1.2 and 5.1.3**) which provides details of the Applicant's compliance with Sections 42, 46, 47, 48 and 49 of the 2008 Act, the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 (the 'APFP Regulations') and the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the 'EIA Regulations') and relevant guidance.

The responses of statutory and other consultees are listed and summarised in the Consultation Report and these have informed the Application and the Proposed Development.

### Environmental Impact Assessment

The Proposed Development is an Environmental Impact Assessment ('EIA') development and the Application therefore includes an Environmental Statement ('ES') that reports the findings of the EIA undertaken. The EIA has been carried out, and the ES prepared, in accordance with the EIA Regulations.

The ES comprises the following documents, which form part of the Application:

- ES Non-Technical Summary (**Application Document Ref. 6.1**);
- ES Volume I: Main Reports (**Document Refs: 6.2.0 to 6.2.22**);
- ES Volume II: Appendices (**Document Refs: 6.3.0 to 6.3.28**);
- ES Volume III: Figures (**Document Refs: 6.4.0 to 6.4.57**).

Two confidential appendices to the Environmental Statement, **Environmental Statement Appendix 11D Badger Report (Application Document Ref: 6.3.12)** and **Environmental Statement Appendix 12A Flood Risk Assessment (Application Document Ref: 6.3.16)**, have been submitted, which are clearly marked "Confidential" on the front page. We request that they are not published. A redacted version of Environmental Statement Appendix 12A Flood Risk Assessment has also been submitted for publication on the project webpage on the Planning Inspectorate's website.

## Overview of the Application

The Application Guide (**Application Document Ref: 1.3**) lists the documents, including the ES, that make up the Application and how these comply with relevant legislative and policy requirements. The Application Guide is a ‘live’ document that will be updated during the examination of the Application, as required.

The location of the Site is shown on the **Site Location Plan (Application Document Ref: 2.1)** and the extent of the land for the Proposed Development (the ‘Order land’), including land over which powers of compulsory acquisition are sought, is shown on the **Land Plans (Application Document Ref: 2.2)**. The **Works Plan (Application Document Ref: 2.3)** identify the location and areas (the Works Nos. areas) within which each of the main elements of the Proposed Development will be constructed and installed. The extent of the Works Nos. is denoted by the coloured and patterned areas on the Works Plan. New and altered means of access are shown in the **Access and Rights of Way Plans (Application Document Ref: 2.4)**. The Crown Land that is within the Site is shown on the **Crown Land Plans (Application Document Ref: 2.3)**.

Indicative drawings of the electrical, water, hydrogen and natural gas connections are provided (**Document Refs: 2.7 to 2.11**). The **Surface Water Drainage Plan (Application Document Ref: 2.12)** shows how surface water is proposed to be managed within the Proposed Development. Illustrative drawings including plans, elevations, sections of various elements of the Proposed Development including the A18 Gatehouse, haul roads and Palfrey laydown are provided (**Document Refs: 2.13 to 2.17**). The **Indicative Landscape and Biodiversity Plan (Application Document Ref: 2.18)** shows where the landscape and biodiversity enhancement measures are proposed within the Site. A standalone document containing the ES Figures prepared pursuant to APFP Regulation 5(2)(I) has been submitted titled **Plans of statutory and non-statutory sites or features (nature conservation) (Application Document Ref: 2.19)**.

As previously described, Schedule 1 of the draft DCO (**Application Document Ref: 3.1**) provides the detailed formal description of the Proposed Development and its elements and identifies the individual numbered works for those elements (shown on **the Works Plan (Application Document Ref: 2.3)**).

Schedule 2 of the draft DCO contains a number of ‘requirements’ that will control the detailed design of the Proposed Development in addition to its construction, operation, decommissioning and site restoration to ensure that it remains within the scope of the EIA carried out and does not result in unacceptable impacts. Certain matters will require the submission to and approval by the relevant local planning authority.

The draft DCO seeks powers of compulsory acquisition of interests and rights in land (including new rights) within the Order limits to enable the Proposed Development to be constructed, operated and maintained. The provisions relating to compulsory acquisition are set out at Part 5 of the **Draft Development Consent Order (Application Document Ref: 3.1)**

These provisions relating to compulsory acquisition are explained in the Explanatory Memorandum. The **Explanatory Memorandum (Application Document Ref: 3.2)** also

explains the purpose and effect of each article and schedule of the draft DCO, as required by Regulation 5(2)(c) of the APFP Regulations. It justifies the inclusion of relevant articles and requirements, including precedent for certain provisions. It has been prepared with regard to the advice in Planning Inspectorate (PINS) Advice: 'Advice on the Preparation and Submission of Application Documents' (July 2025). In preparing the Explanatory Memorandum and the draft DCO the Applicant has had regard to PINS's feedback on draft versions of both documents as part of their standard tier pre-application service. A summary of the Applicant's regard for PIN's Section 51 advice is contained in Appendix 18A of the **Consultation Report Appendices: Part 2 (Application Document Ref: 5.1.3)**.

Information on the interests and rights that exist in relation to the land within the Order limits is provided by the **Book of Reference (Application Document Ref: 4.3)**. The justification for the proposed compulsory acquisition of interests and rights in land is set out in the **Statement of Reasons (Application Document Ref: 4.1)**, and the Applicant's ability to fund this is confirmed by the **Funding Statement (Application Document Ref: 4.2)**. The **Land and Rights Negotiations Tracker (Application Document Ref: 4.4)** documents the status of negotiations with individual landowners, statutory undertakers that possess land, rights and/or apparatus and Crown bodies. It is envisaged that this document will be updated throughout the Examination.

A Habitats Regulations Assessment (**Application Document Ref: 5.2**) has been submitted as required by Regulation 5(2)(g) of the APFP Regulations. The Statement of Statutory Nuisance (**Application Document Ref: 5.3**) is submitted in accordance with Regulation 5(2)(f) of the APFP Regulations. The Other Consents and Licences Statement (**Application Document Ref: 5.4**) identifies the consents and agreements to construct and operate the project which are required separately from the DCO.

The **Planning Statement (Application Document Ref: 5.5)** sets out the need that exists for the Proposed Development and its compliance with the relevant National Policy Statements and other important and relevant matters such as recent UK energy and climate change policy and official evidence, other national planning policies, and local planning documents. The Planning Statement also provides an overview of the benefits and impacts of the Proposed Development and considers its overall acceptability in planning terms.

The approach taken to the design of the Proposed Development including the adoption of a good design process, appropriate design flexibility, development of appropriate access solutions, and a statement of outline design principles, are set out in the **Design and Access Statement (Application Document Ref: 5.6)**. The **Potential Main Issues for Examination (Application Document Ref: 5.7)** summarises, in a table, the main issues expressed by the consultees, which are likely to remain as topics of debate during the Examination, together with information on the Applicant's proposed solution to each. It is envisaged that this will be updated throughout the Examination.

A **Combined Heat and Power Readiness Assessment (Application Document Ref: 5.8)** considers the opportunities for the implementation of Combined Heat and Power in accordance with paragraph 4.8.9 of NPS EN-1. The **Carbon Capture Readiness Statement (Application Document Ref: 5.9)** demonstrates that suitable space remains available at the Site in the eventuality that CCS equipment is required, and that CCS is technically and



economically feasible to be retrofitted to the Proposed Development (Work No. 11), in the eventuality that CCS equipment is required. The Applicant's intention is to deliver low carbon energy through the combustion of hydrogen and to demonstrate Decarbonisation Readiness through Hydrogen Conversion Readiness thereby negating the need for carbon capture readiness.

The **Outline Landscape and Biodiversity Management and Enhancement Plan (Application Document Ref: 5.10)** describes the mitigation and enhancement measures for the biodiversity, landscape and green infrastructure value of the Proposed Development Site. The **Outline Lighting Strategy (Application Document Ref: 5.11)** discusses the type and level of lighting requirements within the Proposed Development.

Information prescribed by regulation 6 of the APFP Regulations is provided within the **Electricity Grid Connection Statement (Application Document Ref: 7.1)**, the **Hydrogen Connection Statement (Application Document Ref: 7.2)** and **Natural Gas Connection Statement (Application Document Ref: 7.3)**.

The **Outline Construction Environmental Management Plan (Application Document Ref: 7.4)** describes the measures to minimise the environmental impact on construction with the **Outline Construction Traffic Management Plan (Application Document Ref: 7.5)** and **Outline Construction Workers Travel Plan (Application Document Ref: 7.6)** describing the measures to manage transport movements during the construction phase. The **Outline Written Scheme of Investigation (Document Reference: 7.7)** set out the scope and methodology for the archaeological mitigation works and the **Greenhouse Gas Reduction Strategy (Document Reference: 7.8)** describes the measures to reduce greenhouse gas emissions associated with the Proposed Development in accordance with NPS EN-1.

#### Application fee and Submission

The required fee on submission of [REDACTED] was paid to PINS by BACS and was received by the PINS finance team on 15 August 2025.

The Application Documents can be accessed at the secure SharePoint site set up by the Planning Inspectorate.

#### Other matters

In accordance with NSIP Advice on the Preparation and Submission of Application Documents a GIS file showing the Order limits was submitted to the Planning Inspectorate on 12 August 2025, more than 10 working days before the Application was submitted.

In accordance with Regulation 5(5) of the APFP Regulations, the Applicant retains all responses to the consultation carried out under Part 5 of the 2008 Act and can make them available at the request of the PINS and/or the SoS.

We look forward to receiving PINS' acknowledgement of receipt of the Application and in due course a decision on acceptance. In the meantime, should you have any questions with regard to the Application, DWD remain the point of contact. Please do not hesitate to contact

Stephen Rose or Nathan Cheung ([REDACTED]@dwd-ltd.co.uk, [REDACTED]@dwd-ltd.co.uk) at this office.

Yours sincerely,

**[REDACTED] BA(Hons) MRTPI**  
**Associate Director**  
**DWD – on behalf of Keadby Next Generation Limited**

[REDACTED]  
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