

# The Keadby Next Generation Power Station Project

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The Keadby Next Generation Power Station Development Consent  
Order [year]

## Pre-Application Programme Document

The Planning Act 2008

Nationally Significant Infrastructure Projects: 2024 Pre-application  
Prospectus

Applicant: Keadby Next Generation Limited

Date: August 2025

Version: V0

## Document History

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## Glossary

Term/ Abbreviation	Description
Applicant	Keadby Next Generation Limited
Application	The Applicant's DCO application for the Proposed Development
CCGT	Combined Cycle Gas Turbine
CO <sub>2</sub>	Carbon dioxide
DCO	Development Consent Order
DESNZ	Department for Energy Security and Net Zero
EIA	Environmental Impact Assessment
MW	Megawatt, equivalent to 1 million watts of power
NLC	North Lincolnshire Council
NSIP	Nationally Significant Infrastructure Project
PA 2008	The Planning Act 2008
PEI Report	Preliminary Environmental Information Report
PINS	The Planning Inspectorate
Proposed Development	The Keadby Next Generation Power Station Project
Site	The Proposed Development Site
SoCC	Statement of Community Consultation
SoS	Secretary of State

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# 1. Introduction

## Background

- 1.1 This Programme Document has been prepared on behalf of Keadby Next Generation Limited (the 'Applicant') pursuant to the Ministry for Housing, Communities and Local Government's 'Planning Act 2008: Pre-application stage for Nationally Significant Infrastructure Projects' guidance. It relates to a proposed application (the 'Application') for a Development Consent Order (a 'DCO'), that is expected to be submitted to the Secretary of State (the 'SoS') for Energy Security and Net Zero ('DESNZ'), under Section 37 of the 'Planning Act 2008' (the 'PA 2008') in August 2025.
- 1.2 The Application will seek a DCO in respect of the Keadby Next Generation Power Station Project (the 'Proposed Development') on land at, and in the vicinity of, the existing Keadby Power Station, Trentside, Keadby, Scunthorpe, Lincolnshire, within the administrative area of North Lincolnshire Council ('NLC') in England.

## The Applicant and the Proposed Development

- 1.3 The Applicant is Keadby Next Generation Limited, part of the FTSE-listed SSE plc, one of the UK's largest and broadest-based energy companies, and the country's leading generator of renewable energy. The Proposed Development is being developed with Equinor. Over the last 20 years, SSE plc has invested over £20billion to deliver industry-leading offshore wind, onshore wind, CCGT, energy from waste, biomass, energy networks and gas storage projects.
- 1.4 SSE owns and operates the adjacent Keadby 1 and Keadby 2 Power Stations. SSE has also obtained a DCO for Keadby 3 Carbon Capture Power Station. The DCO was granted by the SoS on 7th December 2022.
- 1.5 The Proposed Development comprises the construction, operation and maintenance of a CCGT generating station with a capacity of up to 910MW electrical output to be located on land in the vicinity of the existing Keadby Power Stations (Keadby 1 and Keadby 2) near Scunthorpe in North Lincolnshire (the Proposed Development Site).
- 1.6 The Proposed Development is an alternative to the consented Keadby 3 CCS Power Station and would be located on the same Site. By obtaining consents for both low carbon CCGT technology options (i.e. CCS-enabled in the form of Keadby 3 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.
- 1.7 The Proposed Development is expected to comprise one high efficiency CCGT unit and associated infrastructure. The Proposed Development will be designed to run on 100% hydrogen and able to run on 100% natural gas or a blend of hydrogen and natural gas from the start of operation. However, it is currently anticipated that the hydrogen supply chain required for this may not be available at the start of operation, in which case the Proposed Development would also need to be able to operate using 100% natural gas until such time as a commercially viable hydrogen supply chain option becomes available to the Site.

## The Purpose and Structure of the Programme Document

- 1.8 In May 2024, the Government published its 'Nationally Significant Infrastructure Project: 2024 Pre-application Prospectus', which introduced a new pre-application service for Nationally Significant Infrastructure Projects ('NSIPs') such as the Proposed Development. The new pre-application service is supported by updated guidance published on the Government's 2024 National Infrastructure Planning Guidance Portal.
- 1.9 The Pre-application Prospectus introduces three pre-application tier options reflecting different levels of service that applicants may receive from the Planning Inspectorate ('PINS') ahead of submitting an application for a NSIP. These are:
  - basic;
  - standard; and
  - enhanced
- 1.10 The Applicant confirmed in its completed Expression of Interest Form, submitted to PINS on 10th July 2024 (along with this Programme Document), that it wishes to select the 'Standard' pre-application service tier. PINS confirmed on 22 August 2024 that the project will receive Standard tier support from 1 October 2024.
- 1.11 The Government has produced guidance 'Planning Act 2008: Pre-application stage for Nationally Significant Infrastructure Projects' (30th April 2024), which explains the purpose of preparing a Programme Document and also sets out what it should cover.
- 1.12 The guidance states (Paragraph 009 Reference ID 02-009-20240430) that the pre-application process for NSIPs is applicant-led and to deliver a good pre-application process, including effective engagement and a well-prepared application, applicants should draft a Programme Document at the outset of the pre-application stage for submission to PINS.

- 1.13 The guidance goes on to state that the Programme Document will enable all those engaged in the pre-application process, particularly statutory consultees, to understand the timescales and ensure their contribution is programmed into the pre-application stage at the most effective point. It will also assist the applicant in managing the preparation and subsequent submission of the application documents for consideration by PINS at the acceptance stage.
- 1.14 It is expected that the applicant will host and maintain the agreed Programme Document on its website and update it as necessary during the pre-application stage to publicise completion of significant stages and demonstrate progress in preparation of the application.
- 1.15 While the Programme Document is not a statutory requirement or for consultation, the guidance states that it should include (Paragraph 010 Reference ID 02-010-20240430):
- the date the applicant intends to submit their application;
  - a comprehensive timetable of the applicant's pre-application process, the main events with dates and milestones demonstrating how the pre-application process will be completed (using the maximum target of 2 years as a benchmark);
  - the applicant's view on the main issues for resolution and activities they will undertake to address those;
  - the applicant's proposals for engaging with statutory consultees and local authorities during the pre-application period and any intended financial support agreements, such as Planning Performance Agreements (PPAs);
  - the applicant's identification of risks to achievement of the pre-application stage and the process by which these risks are tracked and managed; and
  - cross references to the Statement of Community Consultation ('SoCC') required by section 47 of the PA 2008.
- 1.16 This Programme Document is, therefore, structured as follows:
- **Section 2.0** – Sets out the timetable for the Applicant's pre-application process, including key dates/milestones and the anticipated submission date for the application.
  - **Section 3.0** – Sets out the main issues for resolution during the pre-application stage, including the activities that are being undertaken to address those issues and also identifies potential risks to the achievement of the pre-application stage.
  - **Section 4.0** – Sets out the Applicant's proposals for pre-application consultation, including engagement with statutory consultees and local authorities during the pre-application stage, with cross-references to the SoCC and also the position with regard to any PPA.
- 1.17 This Programme Document has been published on the Applicant's project website <https://www.keadbynextgen.com/> and can be accessed by clicking on 'The Project' tab.

## 2. Pre-Application Process Timetable

2.1 Table 2.1 sets out the timetable for the Applicant’s pre-application process, including key dates/ milestones and the anticipated submission date for the Application. The timetable may be subject to change and this Programme Document will be updated throughout the DCO process as timescales are refined moving forward.

**Table 2.1 Pre-Application Process Timetable**

Activity/ Event	Date/ Milestone
Project website launch	Completed – <a href="http://www.keadbynexgen.com">www.keadbynexgen.com</a>
Engagement with key statutory consultees	Commenced March 2024 - ongoing
EIA Scoping Report issued to PINS	Completed April 2024
EIA Scoping Opinion received from PINS	Completed June 2024
Consultation with host local authorities on draft Statement of Community Consultation (‘SoCC’)	Completed October 2024
Preliminary Environmental Information (‘PEI’) Report and SoCC published on project website	Completed 8 January 2025
Statutory consultation period, including in-person events	Completed 9 January – 20 February 2025
Preparation of application documents	Completed February – July 2025
First Targeted consultation period	Completed 17 April – 29 May 2025
Second targeted consultation period	Completed 9 May 2025 – 20 June 2025
Share drafts of key application documents for PINS review	Completed 6 June 2025
Early Adequacy of Consultation Milestone provided to PINS	Completed 15 July 2025
Section 51 advice received from PINS on pre-application documents	Completed 16 July 2025
Early Adequacy of Consultation Milestone Section 51 advice received from PINS	Completed 21 July 2025
Intended Application submission date	29 August 2025

## 3. Stakeholder Engagement

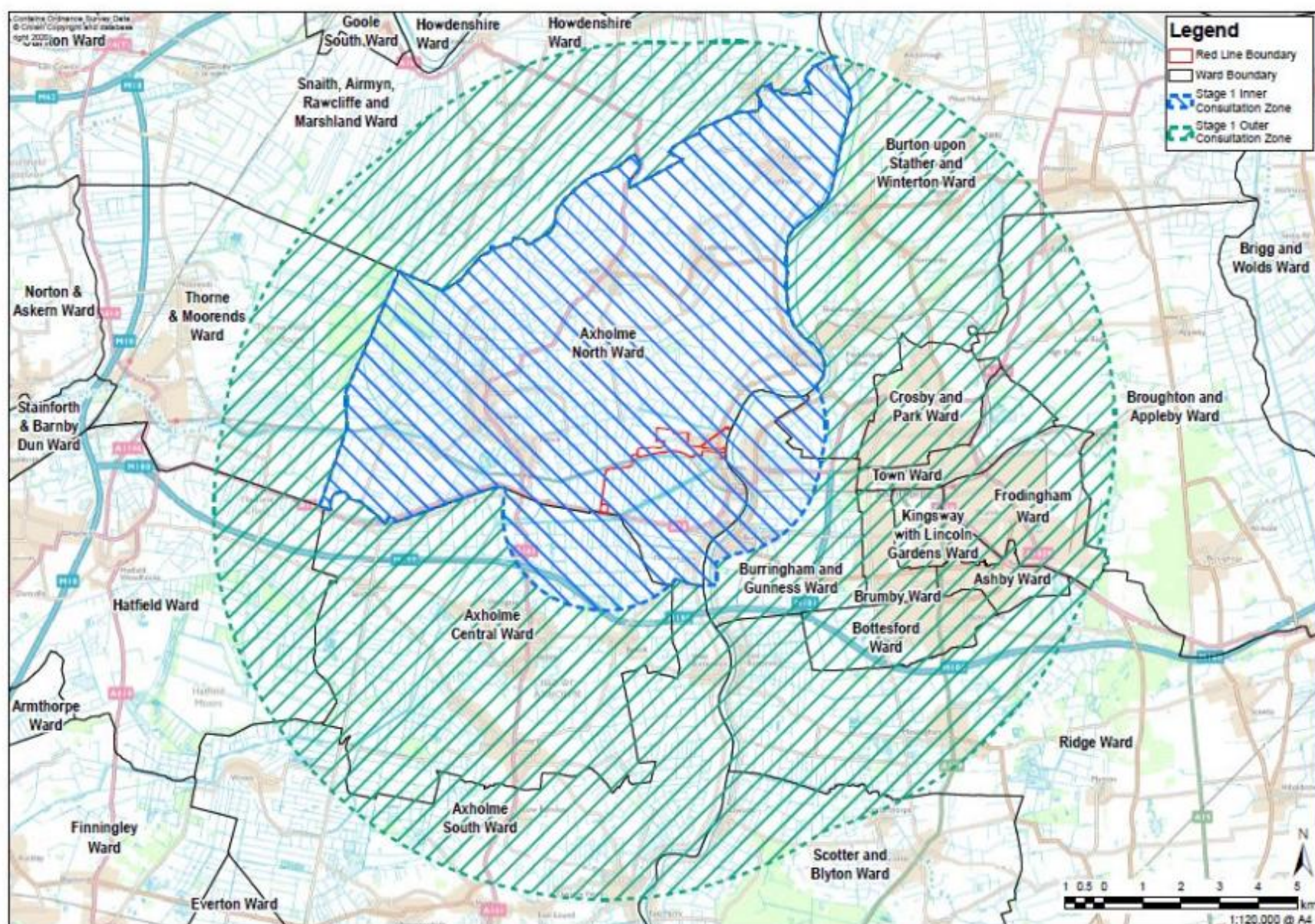
### Stakeholder Engagement Aims

- 3.1 This section sets out the Applicant's proposals for pre-application consultation, including engagement with statutory consultees and local authorities during the pre-application stage and includes cross-references to the SoCC, where appropriate.
- 3.2 The following overall objectives are proposed:
- To create positive, informative and open channels of communication between residents, local political representatives and the media and generate local support for the Project.
  - To provide a robust, accessible and meaningful consultation around the future plans for the site, giving local stakeholders the opportunity to have their views heard and taken into account where possible.
  - Demonstrate how the proposals have taken account of consultation and how the consultation was conducted fairly, safely and considerately.
  - To protect and grow SSE's reputation in the area and uphold a commitment to being a responsible developer, constructor, owner and operator of energy infrastructure.
  - To build and maintain positive relationships with all neighbours and key stakeholders.

### Consultees

- 3.3 There are a number of key stakeholders that the Applicant has been engaging with in relation to developments at the Site and will continue to engage with during the conception and development of the Proposed Development, throughout its construction and operation. SSE will maintain open and proactive communications during the consenting and development process and seek to build strong relationships with key stakeholders. The Keadby Power Station site has a Community Liaison Officer who is already embedded within the community working with both external and internal stakeholders.
- 3.4 A consultation zone-based approach has been used to identify consultees, comprising an 'inner zone' and an 'outer zone'. The consultation methods used are then tailored to each zone.
- 3.5 The inner zone extends to around 2.5km around the boundary of the Proposed Development, broadly corresponding to the areas within which the proposed development could be visually prominent, or receive a perceptible increase in noise or traffic. The outer zone extends to around 10km around the boundary of the Proposed Development and broadly corresponds to the majority of the zone of theoretical visibility estimated for the project based on the maximum built dimensions of the main items of plant and the stacks. It also corresponds to the area which could (without mitigation) experience air quality, traffic or socioeconomic effects or be interested in but unaffected by the Proposed Development.
- 3.6 As Figure 1 shows, the inner zone therefore encloses Gunness, Althorpe, Burringham, Ealand and Amcotts. It has been extended manually to cover the entire Axholme North ward in view of the limited visual separation between this area and the Proposed Development. The outer zone encloses all of Scunthorpe, Epworth, Belton, and Burton upon Stather.
- 3.7 A desk-based land referencing exercise (using Land Registry data) was undertaken prior to the start of the statutory consultation in order to obtain a reasonable level of information on affected landowners within the Site, or potential 'category 3' claimants (i.e. nearby landowners that may experience substantial noise or other disruption) using initial noise contour modelling and transport modelling if available. This has allowed a suitable environmental assessment scope and appropriate engagement with land interests.





*Figure 1 - Consultation Zones*

3.8 The below details some specific key stakeholders and stakeholder groups the Applicant is engaging with.

3.9 **MP:** SSE engaged in the early stages of the Proposed Development with the then MP for the area, Andrew Percy MP, Member of Parliament for Brigg & Goole and the Isle of Axholme. Following the 4 July 2024 General Election and associated 2024 electoral boundary changes, the MP for the Keadby site is now Lee Pitcher MP, Member of Parliament for Doncaster East and the Isle of Axholme. Under the new boundaries, the consultation zone also encompasses the constituency of Scunthorpe (east of the River Trent), represented by Nicholas Dakin MP. The Applicant engaged with both of the newly elected representatives as early as possible about the Proposed Development. Mr Pitcher MP attended one of the consultation events and his office is being kept up to date on major project milestones.

3.10 **Councillors:** The ward and parish councillors who are important to engage with for the duration of the project are:

- Councillors for Axholme North Ward: Councillor John Briggs and Councillor Julie Reed.
- Parish Councillors for Keadby with Althorpe Parish Council, Crowle and Eland Town Council, Luddington and Haldenby Parish Council, Amcotts Parish Council, Eastoft Parish Council, Burringham Parish Council, Gunness Parish Council, Garthorpe Parish Council, and Fockerby Parish Council.

3.11 During early engagement, councillors were informally briefed about plans for the Site, about the Applicant's journey to net zero, and the decarbonisation of the Keadby Power Station site. Following this, Councillors have been engaged with formally as part of the statutory consultation process. Parish councillors attended consultation events and are kept up to date of any developments through comms with and attendance at Parish Council meetings. Keadby Parish Council was also invited to tour the site.

3.12 **Statutory Environmental Stakeholders:** A number of consultees prescribed by the DCO process were engaged at the early engagement stage. These included:

- Natural England
- Environment Agency
- Canal and Rivers Trust
- North Lincolnshire Council
- Isle of Axholme and North Nottinghamshire Water Level Management Board (ANNWLMB)



- 3.13 **Education and School Engagement:** As part of its commitment to inspiring future generations, the Applicant was already engaging with local schools and colleges via the Keadby Power Station site CLO. This work is ongoing and part of a wider engagement programme by the Applicant to work with local educational establishments to ensure that young people are given information on the uses of hydrogen, its role in a net zero economy, future career opportunities on-site and within a hydrogen economy. Activities have to date included:
- working with the local primary school Keadby and Althorpe Primary, to educate young people about what happens at the Keadby Power Station site, energy production and careers;
  - sponsoring a tutor group at Engineering University Technical College North Lincolnshire and working closely with their students;
  - working with local secondary schools, and the local Special Educational Needs (SEN) school St Hugh's in Scunthorpe.
- 3.14 These groups were informed of the Proposed Development as part of this ongoing engagement
- 3.15 **Community Liaison Group (CLG):** This was an existing group that had been set-up to enable the Applicant to engage with matters relating to the Keadby Power Station site. The group meets quarterly and is attended the site's CLO, who provided updates on the Proposed Development during the early engagement stage.
- 3.16 **Community Groups:** the Applicant liaised with the parish/town councils to identify any active community groups in the local area that it would be beneficial to engage with during consultation of the Project.
- 3.17 At around the same time as early engagement was taking place, the Applicant also received EIA Scoping responses from a number of environmental bodies as documented in the ES Volume I Chapters 8 – 20 (Application Document Ref. 6.2).
- 3.18 The Consultation Report includes further details of this stakeholder engagement (see section 6.3).

### Consultation Stages

- 3.19 A non-statutory consultation was considered but deemed to present the risk of consultation fatigue in the local area due to the recent Keadby 3 consultation and ongoing engagement between SSE and the local community around the Keadby Power Station site.
- 3.20 SSE publicly announced the Proposed Development via a press release on 14 March 2024 and provided early information on the proposals. The Proposed Development was not entirely new to the local community as plans for a hydrogen powered station on the Keadby Power Station site have been discussed previously around the site narrative and potential future plans for the site.
- 3.21 Targeted early engagement with technical and key stakeholders was carried out to introduce the Proposed Development and develop key stakeholder understanding following the press release. This has included introductory letters to technical prescribed consultees with whom engagement is required on specific design aspects of the Proposed Development, namely the Environment Agency, Natural England, North Lincolnshire Council and the Canal and River Trust.
- 3.22 These introductory emails were shared between 22 April and 2 May 2024. The emails offered stakeholders a briefing with the Applicant, they also began the process of setting up discretionary advice service (DAS) agreements as required. An initial meeting with the Environment Agency took place on 23 May 2024, a meeting focussed on flood risk assessment took place with the Environment Agency on 18 November 2024 and a meeting with Natural England was held on 7 October 2024.
- 3.23 As part of ongoing engagement for the Keadby Power Station site with local communities, a number of local stakeholders were updated on the Proposed Development by the Applicant's Community Liaison Officer.
- 3.24 On 17 and 18 March 2024 email updates on SSE's plan for the Proposed Development were sent to local parish councils, Andrew Percy MP (MP at the time), as well as the existing Keadby Community Liaison Group. This update included a link to the press release from SSE about the Proposed Development and noted that the Applicant would be starting EIA scoping in April.
- 3.25 Further to this Keadby's Community Liaison Officer attended local quarterly Community Liaison Group meetings, as well as monthly parish council meetings. Following initial contact about the Proposed Development, a brief update was delivered to Keadby with Althorpe Parish Council on 8 May 2024.
- 3.26 Further introductory emails will also be shared with local political stakeholders including the local MPs, ward councillors of the ward where the Site is located, and the local parish council. A Statement of Community Consultation (SoCC) has been developed and was approved by North Lincolnshire Council in October 2024.
- 3.27 **Statutory consultation** took place between 9<sup>th</sup> January and 12<sup>th</sup> February 2025 for six weeks (the statutory minimum is four) during which local stakeholders were asked to provide their comments and feedback. The consultation included:

- Details of SSE's proposals (taking account of early engagement feedback) including how the final Site will look and operate.
- The Preliminary Environmental Information (PEI) Report.
- SSE's emerging proposals for avoiding, minimising and/or mitigating any significant environmental or community effects likely to arise.

3.28 **The first targeted consultation** took place between 17 April and 29 May 2025. This follows further design work and technical assessments that have led to some minor changes to the boundary of the order limits:

- To allow for utility connections to the proposed A18 gatehouse.
- To accommodate the proposed replacement bridge which is marginally wider than the existing.
- To allow for an alternative electrical connection route into the eastern side of the 400kV Substation.
- To enable land access to an existing anchor point for vessels using the Waterborne Transport Offloading Area (Railway Wharf).

3.29 The second targeted consultation took place between 9 May and 20 June 2025. This followed ongoing engineering review and further technical assessment while the first targeted consultation was taking place and comprised a number of localised changes to the boundary of the order limits, namely;

- addition of and further optimisation of an area of land north of and parallel to the A18 to allow for connections to local utilities;
- addition of an area to the south of the proposed Natural Gas AGI to allow for optimised connection to the National Gas pipeline; and
- extension of the proposed Site boundary further into the Stainforth and Keadby Canal to allow for construction and deconstruction of a temporary cofferdam.

3.30 Given the modest size of the areas involved, and the fact that no increase in height is required, the Applicant's view is that a wider reconsultation was not required. Instead, the consultations were targeted at those affected by the change. During both the first and second targeted consultations parties were given six weeks to respond. For both consultations information was provided via letter (sent by registered post) and email. A newsletter setting out the changes was also circulated during this time. Figure 2a and 2b below illustrate the changes to the proposed Order Limits which were the subject of the first and second targeted consultations. The revised proposed Order Limits are shown in red, the previously consulted order limits shown by the blue boundary. The areas of land added to the proposed Order Limits is shown in yellow.

Figure 2a – Changes to Order Limits (in yellow)

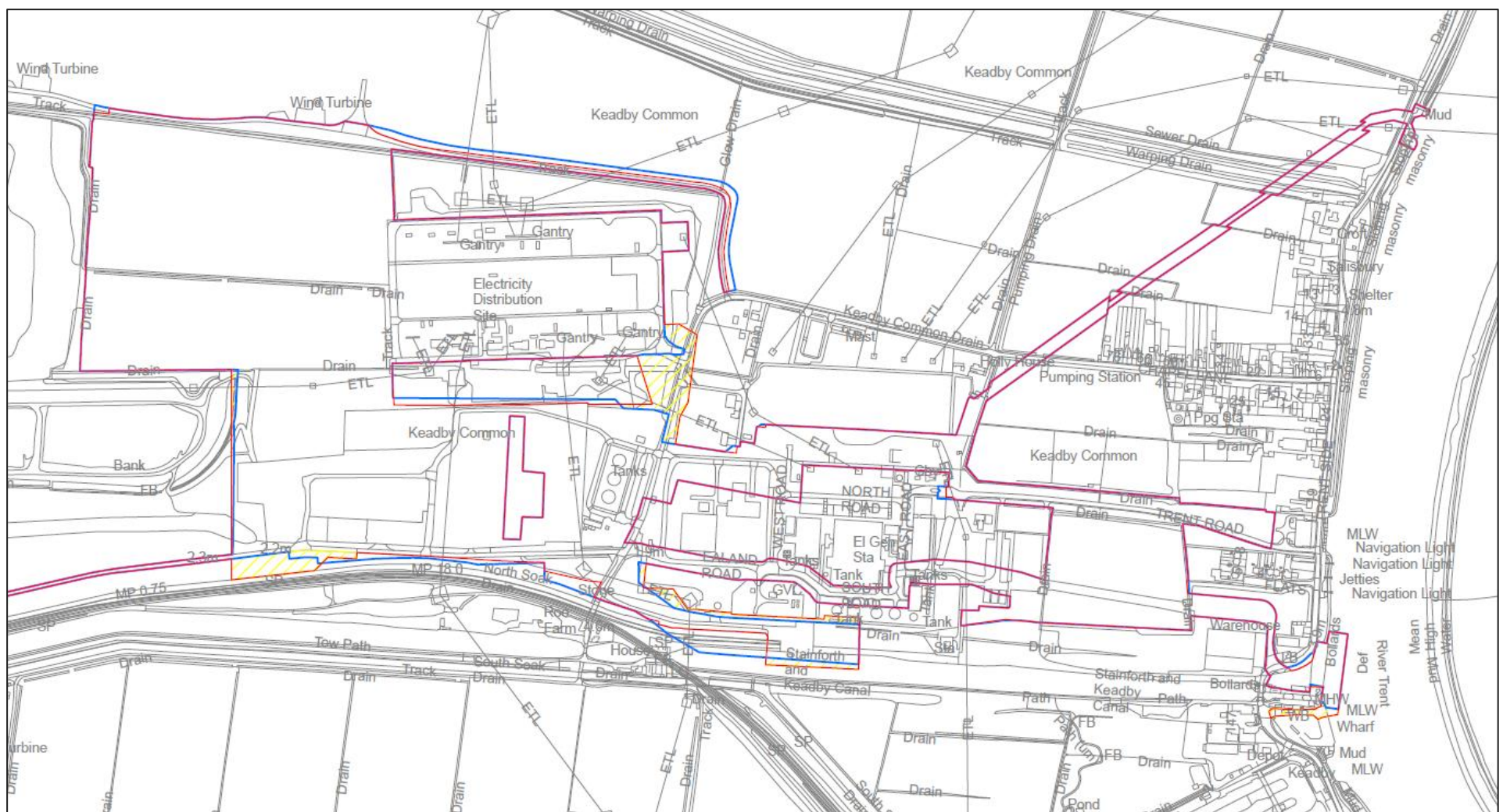
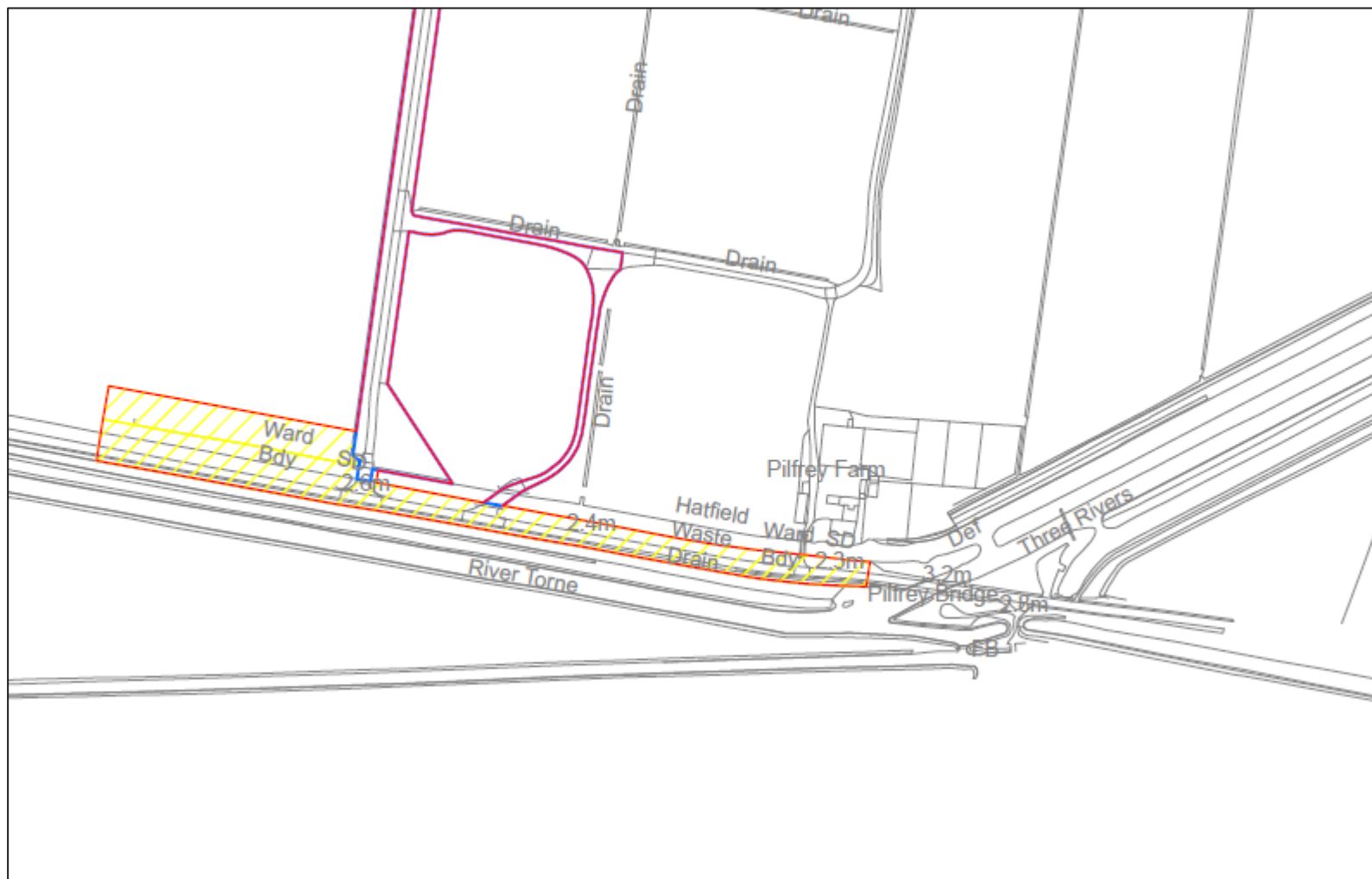


Figure 2b – Changes to Order Limits (in yellow)





## Approach to Engagement and Methods of Communication

3.31 The key engagement activities and methods used are summarised in the table below:

Method/ Activity	Details	Stage
Project website	This hosts information on the Proposed Development, the consultation materials and also a virtual public event. The Website is being updated regularly. The Proposed Development Website can be accessed at: <a href="http://www.keadbynextgen.com">www.keadbynextgen.com</a>	Early engagement  Updated for Statutory consultation
Engagement with local political representatives	Parish Councils and other key stakeholders through e-mail, phones calls and attendance/presentations at virtual meetings	Early Engagement, Statutory consultation
Social media	Keadby community have an active Facebook page. This method of communication is increasingly popular for allowing local people to access news about their communities. During the informal consultation stage, SSE used local Facebook pages to raise awareness of the Project and provide information on the ways in which people can access information and engage. Consultation dates were posted to the Facebook page to disseminate information to the local community.	Early Engagement, Statutory consultation
A virtual public consultation room	Stakeholders have been encouraged to access this space and information will be provided via videos, banners, maps and drawings. An online comments/feedback form was also provided for people to provide initial comments and ask questions.	Statutory consultation
Schools and colleges engagement	This engagement informs young people about plans for the site, how hydrogen is used and how a hydrogen powered power station would work.	Statutory consultation
A newsletter (including comments/feedback form)	A newsletter delivered by post to local residents and businesses within a defined radius of the Site. This was used to publicise the initial consultation and provide information on the Proposed Development.	Statutory consultation

A newspaper advert	A newspaper advert was published in the Scunthorpe Telegraph to publicise the statutory consultation.	Statutory consultation
Freepost address	This was provided for people to return comments/feedback forms and to submit comments by post.	Statutory consultation
Email address	This was provided for people to submit comments, ask questions or request information	Statutory consultation
Freephone telephone number	This was provided for people to leave comments, ask questions or request information.	Statutory consultation
Engagement events	Events were carried out in the local area to facilitate face-to-face engagement between the local community and the Applicant's project team. These provided a space to ask questions of the Applicant's project team and provide feedback on the Proposed Development. The timing and location of these events will be agreed with the local authority via the SoCC.	Statutory consultation

- 3.32 Further details on the statutory consultation methods are set out in a Statement of Community Consultation ('SoCC'), in accordance with s47(1) PA 2008. The relevant local authority, North Lincolnshire Council, was formally consulted on the SoCC before publication.
- 3.33 The technical consultation aspects of statutory consultation (for example, with statutory environmental bodies, relevant statutory undertakers, and landowners) were carried out in accordance with s42-44 PA 2008 and associated regulations. All consultation activities are reported on in the Consultation Report that will accompany the application, as required under s37 PA 2008. The report will also demonstrate the regard had to consultation feedback in accordance with s49 PA 2008.

### Post-Submission Engagement

- 3.34 Following the consultation, stakeholders will be updated at key milestones during the application process. A separate Stakeholder Engagement Plan will be developed as the Proposed Development moves into the construction phase.

## 4. Main Issues and Risks

### Main Issues Identified by the Applicant

- 4.1 This section sets out the main issues for resolution during the pre-application stage, including the activities that will be undertaken to address those issues and also identifies potential risks to the achievement of the pre-application stage.
- 4.2 The main issues that have been identified at this point in the pre-application process are set out in **Table .1** below.

**Table 4.1 Main Issues Identified by the Applicant**

Issues	Mitigation Activities
Air emissions	<ul style="list-style-type: none"> <li>Dispersion modelling to assess impacts and determine stack heights</li> <li>Adherence to emission limits</li> <li>Engagement with the Environment Agency to agree any required mitigation measures and approach to Environmental Permitting</li> <li>PEI Report and ES to consider dust from demolition and construction works and emissions from plant equipment and effects on dust soiling, human health and biodiversity</li> <li>Specific consideration in PEI Report and ES of decommissioning effects on human and ecological receptors and potential difference to construction effects</li> </ul>
Noise emissions	<ul style="list-style-type: none"> <li>Noise modelling to assess impacts including operation of the Proposed Development at the same time as Keadby 1 and 2.</li> <li>Engagement with the local planning authority to agree acceptable noise limits and with the Environment Agency to agree approach to Environmental Permitting</li> </ul>
Flood risk in the event of a breach of River Trent defences	<ul style="list-style-type: none"> <li>Land raising to protect the Proposed Development</li> <li>Flood modelling to assess impacts outside the Site</li> <li>Engagement with the Environment Agency to agree height of land raising, model outputs and any required mitigation measures</li> </ul>
Ecological impacts and delivery of Biodiversity Net Gain	<ul style="list-style-type: none"> <li>Ecological surveys to inform impact assessment</li> <li>Use of Defra BNG metric</li> <li>Engagement with Natural England to agree Habitats Regulations Assessment conclusions and any required mitigation measures</li> </ul>
Surface water availability for abstraction/ cooling	<ul style="list-style-type: none"> <li>Canal abstraction has already been assessed and approved for Keadby 3 Power Station</li> <li>Remove option to abstract from River Trent</li> </ul>
Hydrogen readiness tests	<ul style="list-style-type: none"> <li>Developing Aldbrough Hydrogen Storage project with Equinor;</li> <li>Engaging with hydrogen pipeline developers;</li> <li>Involvement in hydrogen production project on the East Coast;</li> <li>Engaging with hydrogen CCGT technology providers.</li> </ul>
Climate change and GHG assessment scenarios	<ul style="list-style-type: none"> <li>Define potential scenarios for fuelling the Proposed Development (i.e. timescales for use of natural gas/ blending/ switchover to 100% hydrogen) to be applied to GHG assessment</li> <li>Explain rationale/ justification for initial period of natural gas firing in ES policy support to ensure security of supply and give more certainty to hydrogen production industry to progress</li> <li>ES Climate Change chapter to assess emissions profiles and overall carbon impacts of natural gas vs hydrogen fuel (or blending).</li> </ul>
R (Finch) vs Surrey County Council case law implications for scope of EIA	<ul style="list-style-type: none"> <li>Review potential upstream and downstream effects, whether there is an 'inevitable' causal link, and the extent to which these can be meaningfully assessed in the EIA</li> </ul>
Traffic and transport, including potential navigation impacts and obstruction impacts	<ul style="list-style-type: none"> <li>ES Traffic and Transport chapter to include specific consideration of decommissioning effects</li> <li>ES Traffic and Transport chapter to include potential: <ul style="list-style-type: none"> <li>Navigation impacts of any waterborne transport (AILs etc);</li> <li>Obstruction impacts on Keadby Lock from use of Railway Wharf;</li> <li>Any required mitigation and how this will be secured.</li> </ul> </li> </ul>

Issues	Mitigation Activities
Biodiversity and Nature Conservation/ proximity to internationally designated Habitat sites	<ul style="list-style-type: none"> <li>• ES Biodiversity and Nature Conservation chapter to identify and describe any INNS present in the baseline and include an assessment if there is the potential for significant effects to occur.</li> <li>• ES Biodiversity and Nature Conservation and Air Quality chapters to consider air quality impacts on statutory designated nature conservation sites up to 15km from the Site.</li> <li>• ES Biodiversity and Nature Conservation chapter to include consideration of potential water quality impacts affecting ecological receptors, with cross reference to the Water Environment and Flood Risk chapter.</li> <li>• ES Biodiversity and Nature Conservation chapter to determine whether further sediment sampling is required, and if so, agree a sediment sampling plan with relevant consultation bodies.</li> <li>• ES to include details of any proposed piling works (including piling method, pile size, number of piles and expecting duration/ timing), and assess piling impacts in the Biodiversity and Nature Conservation chapter.</li> </ul>
Water Environment	<ul style="list-style-type: none"> <li>• ES Water Environment and Flood Risk chapter to consider: <ul style="list-style-type: none"> <li>○ Potential for construction and operational works to change sediment quality and mobilise sediments, including in relation to construction vessel movements; and</li> <li>○ Potential for significant effects on sensitive receptors.</li> </ul> </li> <li>• ES Water Environment and Flood Risk chapter to include consideration of water quality impacts on the Humber Estuary SPA including the potential for impacts on the SPA arising from the River Trent acting as a hydrological pathway</li> <li>• ES Water Environment and Flood Risk chapter to include: <ul style="list-style-type: none"> <li>○ information on effluent streams and discharges related to construction and operation of the Proposed Development</li> <li>○ any new or amended permits required for effluent discharges;</li> <li>○ evidence of consultation with relevant consultees in relation to the scope and methodology of water quality assessment.</li> </ul> </li> </ul>

Risks to Achievement of Pre-App Stage Identified by the Applicant

4.3 Table 3.2 below sets out the risks currently identified by the Applicant’s to achievement of the pre-app stage and the process for tracking and managing these risks.

Table 4.2 Main Risks Identified by the Applicant

Risks	Management of Risk
Delays due to resource constraints within statutory consultee organisations and local authorities	Setting up paid pre-application advice agreements, including cost recovery, where available with key statutory consultees (e.g. Environment Agency, Natural England). The Applicant is also exploring a Planning Performance Agreement with the host local authority, North Lincolnshire Council, to address possible resource constraints.
Adequacy of environmental surveys	Use of existing site data and approaches previously agreed on Keadby 3, engagement with Natural England on survey methodologies
Adequacy of pre-application consultation	<p>A range of consultation methods have been employed to provide opportunities for people to learn more about the Proposed Development and provide comments. The Applicant has prepared a Statement of Community Consultation (‘SoCC’), which sets out the proposals for the statutory consultation and has consulted the host local authority on the document and had regard to their comments and feedback in finalising the SoCC.</p> <p>In accordance with the ‘Adequacy of Consultation Milestone’, which has been introduced by the pre-application prospectus, the Applicant made a written submission to PINS in June 2025, confirming the approaches set out in the SoCC, and summarising the consultation responses and the way in which they have informed the application. This should minimise risk at the acceptance stage.</p>
Potential objections from key stakeholders or statutory consultees/ inability to resolve issues identified during pre-application prior to acceptance	An Issues Tracker has been developed to highlight key issues raised during the pre-application stage (e.g. around environmental effects, Habitats Regulations Assessments etc) and the relevant stakeholders affected. This document has been updated regularly throughout the pre-application process and is informing the application document, the Potential Main Issues for the Examination (PMIE) which will be entered into the examination as an application document.