

## **Keadby Next Generation Power Station – EN0110001**

### **Natural England - Principal Areas of Disagreement Statement (PADS) – Pre Examination**

**Date:** 30 September 2025

Please note, Natural England based the comments below on our understanding of the development prior to submission, and had not yet reviewed any updated documents submitted for examination. This was developed in response to the request for a PADS to be submitted prior to the start of Registration. There may have been updates to these issues included within our Relevant Representation. We will submit an updated PADS ahead of deadline 1, following discussion with the Applicant on SoCG matters still to be addressed.

<b>PADS reference</b>	<b>Principal issue in question.</b>	<b>The brief concern held by Natural England which will be reported on further at relevant Examination deadlines.</b>	<b>What needs to change, be included, or amended, to overcome the disagreement.</b>	<b>Likelihood of the concern being addressed in examination.</b>
<b>PADS1</b>	Air pollution impacts to designated sites during construction.	Further information is required to determine no LSE to Humber Estuary designated sites during construction for NOx, ammonia, Ndep and SO2.	Emissions from non-road mobile machinery, and generators, during the construction period should also be considered.  Justification for determining that SO2 emissions during construction are unlikely should be provided (fuel type to be used for example).  The air quality annex in the ES indicates over 1% changes in Ndep from the project alone at several receptors, and NOx over 1% at one receptor. Justification as to why this would not result in AEOI should be provided.	Likely

			Ammonia should be considered as a traffic pollutant, and as a component of Ndep.	
<b>PADS2</b>	Air pollution impacts to designated sites during operation.	Further information is required to determine no LSE to Humber Estuary designated sites during operation for NOx, ammonia and Ndep.	<p>Traffic impacts during operation should be addressed.</p> <p>PCs of NOx exceed 1% of the critical level, there is an LSE from this pollutant, so consideration within the AA is required.</p> <p>Table 14 of the AQ ES chapter indicates that ammonia would be 2% of the critical level at Humber SAC/SPA/Ramsar so it is not clear why LSE is excluded.</p>	Likely
<b>PADS3</b>	Noise and Visual disturbance to birds on adjacent arable habitat.	Additional information is required to rule out potential impacts to birds associated with the Humber Estuary SPA/Ramsar.	<p>The bird survey results demonstrate low levels of use in the adjacent fields, however as this data was collected in a few years ago, it should be paired with any available desk study information to further support the conclusions.</p> <p>Further clarification is needed on the difference between background noise levels and the peaks during piling. The draft HRA AA cites habituation of birds to background noise, but does not clearly demonstrate timings and level of periodic noise potential impacts that current background noise may have on bird behaviour.</p>	Likely

<b>PADS4</b>	Water quality impacts to Humber Estuary designated sites	The HRA should include additional information on impacts and mitigation in order to justify conclusions presented.	<p>The HRA should state what the BAT measures are or indicate where they will be outlined (in the CEMP/OEMP for example), and how they will be secured.</p> <p>Evidence should be provided on what the anticipated temperature and volume inputs are for this development and how impacts to the designated sites were screened out.</p> <p>Whether the surface water drainage network will output water into designated sites should be discussed in the HRA. Along with mitigation if required.</p> <p>No removal of below ground structures is proposed. Degradation of the below ground structures could cause impacts to groundwater if pollutants are released. Potential pollutants should therefore be addressed.</p>	Likely
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<b>PADS5</b>	In combination assessment within the HRA (in particular, for air and water quality impacts).	Throughout the HRA and AA it should be made clear which developments, and which combinations of effects, are being considered when the wording “in-combination” is being used.	<p>It should be clarified whether Keadby 1 is included within the in combination assessment. Also, it should be clarified whether Keadby 1 is being decommissioned, if so when and how this is being considered when looking at in-combination effects for air and water quality.</p> <p>There are points in the HRA (e.g. paragraph 6.3.26) where it is implied that the project is being assessed in-combination with the other Keadby developments, but they are included in the baseline. Clarification is needed as to which developments are being considered within the baseline.</p> <p>Clarification should be provided in the HRA on air quality results to Thorne and Hatfield Moors designated sites, ie, an explanation that the assessment was undertaken in-combination from the outset.</p>	Likely
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