

Date: 14 January 2026
Your Ref: EN0110001
Our Ref: 17427

DWD

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Mrs Caroline Hopewell
Case Manager
National Infrastructure Planning
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By email: keadbynextgeneration@planninginspectorate.gov.uk

Dear Mrs Hopewell

EN0110001 – APPLICATION BY KEADBY NEXT GENERATION LIMITED FOR AN ORDER GRANTING DEVELOPMENT CONSENT FOR THE KEADBY NEXT GENERATION POWER STATION PROJECT (THE “PROPOSED DEVELOPMENT”)

APPLICANT’S SUBMISSIONS IN RESPECT OF PRE-EXAMINATION PROCEDURAL DEADLINE OF 14TH JANUARY 2026

I write on behalf of the Applicant, Keadby Next Generation Limited, in response to the Examining Authority’s (ExA’s) letter issued under ‘The Infrastructure Planning (Examination) Rules 2010 – Rules 6, 9 and 13’ (the ‘Rule 6 letter’) and dated 15 December 2025.

The Applicant’s written submissions in respect of the Pre-examination Procedural Deadline of 14th January 2026 are set out below.

[Notification of wish to speak at the Preliminary Meeting \(PM\), Issue Specific Hearing 1 \(ISH1\) and Compulsory Acquisition Hearing 1 \(CAH1\)](#)

The Applicant will participate in the PM, ISH1 and CAH1. It is anticipated that the following representatives of the Applicant may need to speak:

Likely speakers at PM:

- Mustafa Latif-Aramesh (Partner) – TLT
- John Arthur (Managing Associate) – TLT
- Alistair Hilton (Lead Consents Manager) – SSE
- Richard Lowe (Director) – Arup
- Kirsty Cobb (Associate Director) – Arup
- Geoff Bullock (Joint Managing Director) – DWD

Likely speakers at ISH1:

- Mustafa Latif-Aramesh (Partner) – TLT
- John Arthur (Managing Associate) – TLT
- Alistair Hilton (Lead Consents Manager) – SSE
- Simon Render (Environment Manager) – SSE
- Richard Lowe (Director) – Arup
- Kirsty Cobb (Associate Director) – Arup
- Geoff Bullock (Joint Managing Director) – DWD

Likely speakers at CAH1:

- Mustafa Latif-Aramesh (Partner) – TLT
- John Arthur (Managing Associate) – TLT
- Alistair Hilton (Lead Consents Manager) – SSE
- Peter Roberts (Director) – DWD

It is anticipated that the following representatives of the Applicant will also attend the PM, ISH1 and CAH1, but are unlikely to speak:

- Nathan Cheung (Associate) – DWD
- Gareth Mills (Head of Land and Consents) – SSE
- Julia Cobern (Senior Planning and Consents Solicitor) – SSE
- Arnaud Lereculey (Senior Project Manager) - SSE

Initial Assessment of Principal Issues – Annex C***Updated National Policy Statements***

With regard to the National Policy Statements (NPSs) for energy, the Applicant notes that the versions of the NPSs that came into force on the 17th January 2024 have effect for the purposes of decision-making by the Secretary of State in respect of the Proposed Development as the application for development consent (the 'Application') was accepted for examination before the final publication of the approved 2025 NPS amendments.

The Applicant has considered the new versions of the NPSs (which came into force on 6th January 2026) below in accordance with the request made by the ExA at Annex D of the Rule 6 letter.

Veteran and Ancient Trees

The Applicant notes that the ExA has listed the potential loss of four identified veteran and ancient trees (two likely veteran and two likely ancient goat willow trees) due to the proposed canal water abstraction works as one of the principal issues to examine.

Following the submission of the Application, the Applicant has had the opportunity to review the status of these trees during a site meeting with the Arboricultural Officers at the host local authority, North Lincolnshire Council (NLC). The Arboricultural Officers from NLC did not agree with the Applicant's precautionary classification of the trees, stating that the two trees identified in the Arboricultural Assessment (Outline Landscape and Biodiversity Management and Enhancement Plan, Appendix E [APP-161]) as 'likely ancient' were, in their professional opinion, large specimens due to

the growing conditions, not 'ancient'; and the two trees identified as 'likely veteran' were not considered to be of exceptional biodiversity value despite having habitat features and are not 'veteran'. On this basis it was agreed between the Applicant and NLC that the Arboricultural Assessment and related documents could be updated to remove reference to these trees being 'likely ancient/ veteran' and that this agreement should be recorded in the Statement of Common Ground (SoCG) between the parties.

In view of this change, this letter is accompanied by a number of updated Application documents, including updated versions of the Outline Landscape and Biodiversity Management and Enhancement Plan, ES Volume I Chapter 11: Biodiversity and Nature Conservation, ES Volume I Chapter 14: Landscape and Visual Amenity, and ES Volume I Chapter 22: Summary of Likely Significant Residual Effects. The updated version of ES Chapter 22 now confirms that no significant effects are predicted to occur during construction in relation to biodiversity and nature conservation as a result of the potential loss of the trees.

As a result of the above, it is proposed that Requirement 32 'Tree compensation strategy' will be deleted from Schedule 2 of the draft DCO [AS-003]. The Applicant intends to raise this at ISH1 on the draft DCO on 21 January 2026.

Statements of Common Ground (SoCG) and Statement of Commonality of SoCG – Annex D

The Applicant agrees with the list of SoCG set out by the ExA at Annex D and notes that the ExA has requested that SoCG are to be submitted as a final version only at Deadline 6 of the Examination (16th June 2026).

For Deadlines 1 to 5 of the Examination, the Applicant will prepare and submit a Statement of Commonality of the SoCG, which will set out the progress of negotiations between the Applicant and SoCG parties.

Changes to National Policy Statements on Energy

On 13th November 2025, the Secretary of State (SoS) announced his intention to publish new versions of NPS EN-1 (the Overarching NPS for Energy), NPS EN-3 (renewable energy infrastructure) and NPS EN-5 (electricity networks infrastructure) following a 21-sitting day consideration period by Parliament.

The ExA has requested that, if the SoS has published the new versions of the NPSs before the PM, the Applicant advises, at the PM, if it considers the new versions of the NPSs (the 2025 NPSs) have any bearing on the case for the Proposed Development having regard to the transitional provisions set out in Section 1.6 of NPS EN-1 (dated December 2025) and if so, by when it will make its written submissions on the matter. The new versions of the NPSs came into force on 6th January 2026. The Applicant has set out its written submissions on the new 2025 NPSs below.

The Applicant's Planning Statement (Application Document Ref. 5.5) [APP-156] sets out how the Applicant has taken account of relevant planning policy, notably the NPSs for energy, and the extent to which the Proposed Development complies with the policies within the NPSs, as well as any other matters that are important and relevant to the SoS's determination of the Application.

The Planning Statement included a review of the April 2025 draft NPSs of relevance to the Proposed Development, that is, EN-1 and EN-5. With regard to this, paragraph 3.2.9 of the Planning Statement states:

“3.2.9 The Applicant has therefore considered whether the proposed changes to the NPSs would give rise to a different conclusion on any assessment matter. Having examined all of the changes to the Assessment Principles and Generic Impacts, the Applicant’s assessment is that the changes do not raise any issues that require a different conclusion to be reached on the key issues or the planning balance.”

The Applicant has now reviewed the updates made to the April 2025 draft NPSs (EN-1 and EN-5) laid in Parliament on 13th November 2025 and which are included in the new 2025 NPSs that came into force on 6th January 2026.

In general, the changes made since April 2025 place greater emphasis on the delivery of the Government’s Clean Power 2030 Mission.

A new paragraph 2.2.2 has been added to EN-1 confirming that cleaning up the power system is central to the decarbonisation of the economy and that clean electricity supply opens up routes to the electrification of heat, transport and industry and reduced pollution, protects our environment and quality of life. Paragraph 2.3.5 (this was paragraph 2.3.4 in the April 2025 draft) continues stating that the Clean Power Action Plan will be driven through rapid deployment of low carbon generation.

Paragraph 3.3.17 of the new EN-1 recognises that unabated gas generating capacity is needed as it currently plays a critical role in keeping the electricity system secure and stable. Furthermore, that it will continue to be needed during the transition to net zero while we develop and deploy low carbon alternatives that can replicate its role in the electricity system.

Paragraph 3.3.63 of the section ‘The need for electricity generating capacity’ (paragraph 3.3.66 in the April 2025 draft of EN-1) now confirms that the need case for Critical National Priority (CNP) infrastructure, together with the national security, economic, commercial and net zero benefits of such infrastructure, will outweigh any other residual impacts not capable of being addressed by the application of the mitigation hierarchy, in all but the most exceptional circumstances. As such, this change to EN-1 further reinforces the presumption in favour of granting consent for CNP infrastructure, such as that being proposed by the Applicant.

It is not considered that there are any changes to EN-5 that are of direct relevance to the Proposed Development.

The Applicant considers that while the changes incorporated in the new 2025 version of EN-1 that are of relevance to the Proposed Development provide additional policy support for Power CCUS projects and CNP infrastructure, they do not materially affect the Applicant’s assessment of the Proposed Development against relevant policy as set out in the Planning Statement.

Accompanied Site Inspection – Annex D

The Applicant will prepare a draft itinerary for the Accompanied Site Inspection (ASI), taking account of the areas identified by the ExA at Annex D of the Rule 6 letter, and submit this by Deadline 1 (4th February 2026).

Where feasible the Applicant will seek to accommodate any sites or locations suggested by Interested Parties, which are deemed by the ExA to be necessary to review on an accompanied basis.

Status of Applicant’s Examination documents – Annex D

The Applicant will submit an updated Application Guide at each Examination deadline that clearly identifies the most up-to-date status of the documents submitted. A final version of the Application Guide will be submitted before the end of the Examination.

Yours sincerely,

DWD – on behalf of Keadby Next Generation Limited