

The Keadby Next Generation Power Station Project

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

Land at, and in the vicinity of, the existing Keadby Power Station (Trentside, Keadby, Scunthorpe DN17 3EF)

Planning Statement

The Planning Act 2008

The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 regulation 5(2)(q)

Applicant: Keadby Next Generation Limited

Date: December 2025

Revision: 2

Glossary

Abbreviation	Description
APFP Regulations	Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 (as amended)
AGI	Above Ground Installation
ALARP	As Low As Reasonably Practicable
BAT	Best Available Technique
BMEP	Biodiversity Management and Enhancement Plan
BNG	Biodiversity net gain
DESNZ	Department for Energy Security and Net Zero (government department)
CCC	Climate Change Committee
CCCP	Carbon capture and compression plant
CCGT	Combined Cycle Gas Turbine
CCS	Carbon Capture and Storage
CEMP	Construction Environment Management Plan
COMAH	Control of Major Accident Hazards
CHP	Combined Heat and Power
CO2	Carbon Dioxide
DAS	Design and Access Statement
DCLG	Department for Communities and Local Government
DCO	Development Consent Order
DESNZ	Department for Energy Security and Net Zero
DPD	Development Plan Document
EA	Environment Agency
EIA	Environmental Impact Assessment
ELV	Emission Limit Value
EMF	Electric and Magnetic Field
EP	Environmental Permitting
EPA	Environmental Protection Act
EPC	Engineering, Procurement and Construction

ES	Environmental Statement
ExA	Examining Authority
GHG	Greenhouse Gas Emissions
GGR	Greenhouse Gas Removal
GW	Gigawatts
HA	Hectares
HAS	Hazardous Substances Authority
HSE	Health and Safety Executive
HSC	Hazardous Substances Consent
H2P	Hydrogen to Power
kV	Kilovolts
LBMEP	Landscaping and Biodiversity Management and Enhancement Plan
MA&D	Major Accidents and Disasters
MHCLG	Ministry of Housing, Communities and Local Government
MPS	Marine Policy Statement
MW/MWe	Megawatts/Megawatts electrical
NCA	National Character Areas .
NGET	National Grid Electricity Transmission
NGR	National Grid Reference
NIC	National Infrastructure Commission
NLC	North Lincolnshire Council
NPPF	National Planning Policy Framework
NSIP	Nationally Significant Infrastructure Project
NTS	Non-Technical Summary
PA 2008	Planning Act 2008
PEI Report	Preliminary Environmental Impact Report
PINS	Planning Inspectorate
plc	Public limited company
PPG	Planning Practice Guidance
PRoW	Public Right of Way
Q1/Q2/Q3/Q4	Quarter 1/2/3/4 (of a year)

SCI	Statement of Community Involvement
SNCB	Statutory Nature Conservation Board
SoCC	Statement of Community Consultation
SoS	Secretary of State
SWMP	Site Waste Management Plan
the EIA Regulations	Infrastructure Planning (Environmental Impact Assessment) Regulations 2017
TTWA	Travel to Work Area

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Executive Summary

Background

- 1 This Planning Statement has been prepared by DWD Property and Planning Limited on behalf of Keadby Next Generation Limited ('the Applicant') which is a subsidiary of SSE plc. It forms part of the application for a Development Consent Order ('DCO') (the 'Application'), that has been submitted to the Secretary of State (the 'SoS') for Energy Security and Net Zero, under Section 37 of 'The Planning Act 2008'.
- 2 The Applicant is seeking development consent for the construction, operation and maintenance of a new combined cycle gas turbine ('CCGT') electricity generating station on land at, and in the vicinity of, the existing Keadby Power Station, Trent Side, Keadby, Scunthorpe DN17 3EF ('the Site').
- 3 The Keadby Next Generation Power Station ('the Proposed Development') is a new CCGT electricity generating station with a capacity of up to 910 Megawatts electrical output (MWe). The CCGT electricity generating station will be designed to run on 100% hydrogen and able to run on 100% natural gas or a blend of natural gas and hydrogen and will be located on land to the west of Keadby 1 and Keadby 2 power stations. The Proposed Development includes connections for cooling water, electricity, hydrogen, natural gas, and construction laydown areas and other associated development.
- 4 The Proposed Development falls within the definition of a 'Nationally Significant Infrastructure Project ('NSIP')' under the 2008 Planning Act ('PA 2008'), as it is an onshore generating station in England that would have a generating capacity greater than 50MWe. As such, a DCO application is required to authorise the Proposed Development in accordance with Section 31 of the PA 2008t.
- 5 The DCO, if made by the SoS, would be known as 'The Keadby Next Generation Power Station Order' ('the Order').
- 6 The Proposed Development would comprise a high efficiency gas fired power station with an electrical output capacity of up to 910MWe and associated buildings, structures and plant and other associated development defined in Schedule 1 of the **Draft DCO (Application Document Ref. 3.1)** as Work Nos. 1-11 and shown on the **Works Plans (Application Document Ref. 2.3)**
- 7 The Proposed Development will be capable of operating 24 hours per day, 7 days per week with programmed offline periods for maintenance.
- 8 The Site lies within the administrative boundary of North Lincolnshire Council ('NLC'). The majority of land is within the ownership or control of the Applicant (or SSE associated companies).

The decision-making framework

- 9 **Section 5** of the PA 2008 allows the SoS to designate National Policy Statements ('NPS') in relation to NSIPs.

The need for new energy infrastructure

- 10 NPS provide the policy framework for examining and determining applications for DCOs. Other matters can be 'important and relevant' to the SoS's decision (including the Government's energy and climate change policies), but NPS have primacy in the decision making process
- 11 NPS EN-1 firmly establishes that an urgent need exists for new nationally significant energy infrastructure to meet the Government's energy objectives. Paragraph 3.2.7 confirms that the SoS 'has determined that substantial weight should be given to this need when considering applications for development consent under the Planning Act 2008.'
- 12 Section 4.2 of EN-1 identifies the provision of nationally significant low carbon infrastructure such as the proposed power station as a 'critical national priority' due to the roles it can play ensuring security of supply, decarbonising the UK's power system by 2035, and supporting the goal of achieving net zero by 2050.

UK Energy and Climate Change Policy

- 13 The Government has set out its objectives for decarbonising the power and industrial sectors in order to achieve the legally binding target of net zero by 2050. In broad terms, the Government's objectives are to:
 - Achieve net zero greenhouse gas ('GHG') emissions by 2050.
 - Ensure the security of energy supplies.
 - Contribute to sustainable development.
 - Achieve the goals set out in the Clean Power 2030 Action Plan.

Benefits of the Proposed Development

- 14 Constructing and operating this power station will have several very clear and tangible benefits that align with these Government objectives:
 - The Proposed Development is designed to run on 100% hydrogen, which produces zero emissions at the point of combustion, supporting the UK's long-term decarbonisation goals by providing backup low-carbon power to renewable generation.
 - Providing up to 910MW (gross capacity) of dispatchable generation the Proposed Development will make a significant contribution towards the critical national need for low carbon electricity generation established in NPS EN-1. This need has become more urgent following the coming into force of the Climate Change Act 2008 (2050 Target Amendment) Order 2019, i.e. Net Zero by 2050, and the publication of the Clean Power 2030 Action Plan.
 - The Proposed Development would 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 10 Gigawatt

(‘GW’) of electricity supply being generated by hydrogen fired power stations. The Site’s location in the Humber Industrial Cluster makes the delivery of hydrogen more likely and will support the plan for decarbonisation of the Cluster.

- Large parts of the Site are within the ownership or control of SSE companies and the generating station would be situated on brownfield land adjoining and within an existing power station with existing electricity grid, gas supply, and cooling water supply infrastructure, thereby minimising the need for new connections and third party land. The location affords important efficiencies in terms of the operation and maintenance of the Proposed Development, also potentially reducing land and staffing (trip generation) compared to a development not situated at an existing power station.
- Significant beneficial local and regional impacts would result from the direct, indirect and induced employment created by the construction phase of the Proposed Development on the Scunthorpe Travel to Work Area (TTWA) and associated economy, as identified in Chapter 16: Socio-economics of the Environmental Statement (ES) Volume I (**Application Document Ref. 6.2.16**).

Adverse Impacts

- 15 It is necessary to weigh these benefits against any adverse impacts arising from the Proposed Development. These are assessed in Section 4 against the Assessment Principles set out in the NPSs and national and local planning policy. This assessment has not identified any conflicts with NPS policy and only one potential conflict with local policy.
- 16 During construction, and during operation and decommissioning, and in the event that the Keadby 1 power station is decommissioned, there would be moderate or major adverse visual amenity effects for residents at Viewpoint 1 (Chapel Lane West, Keadby), Viewpoint 2 (Gate Keepers Residence, Vazon Bridge, Keadby) and users of the canal and towpath at Viewpoint 2. In the event that Keadby 1 structures are still present, there would be adverse visual amenity effects on residents at Viewpoint 6 (Truck Road, Keadby) during operation and decommissioning. These are considered unavoidable due to the scale of the required structures. Full mitigation is not possible. This impact needs to be considered in the context of NPS EN-1 paragraph 5.10.5 which acknowledges that, ‘Virtually all nationally significant energy infrastructure projects will have adverse effects on the landscape...’

The Planning Balance

- 17 EN-1 confirms that provision of critical national infrastructure should be given substantial weight in the planning balance and that the SoS will start with a presumption in favour of granting consent for energy NSIPs. In this context, the limited adverse residual effects of the Proposed Development are comprehensively outweighed by its benefits.

1. Introduction

1.1. Overview

- 1.1.1 This Planning Statement (**Application Document Ref. 5.5**) has been prepared by DWD on behalf of Keadby Next Generation Limited ('the Applicant') which is a subsidiary of SSE plc. It forms part of the application for a Development Consent Order (DCO) ('the Application'), that has been submitted to the Secretary of State (the 'SoS') for Energy Security and Net Zero under Section 37 of 'The Planning Act 2008' ('the 2008 Act').
- 1.1.2 The Applicant is seeking development consent for the construction, operation and maintenance of a new combined cycle gas turbine ('CCGT') electricity generating station on land at, and in the vicinity of, the existing Keadby Power Station, Trentside, Keadby, Scunthorpe DN17 3EF ('the Site').
- 1.1.3 The Keadby Next Generation Power Station ('the Proposed Development') is a new CCGT electricity generating station with a capacity of up to 910MW electrical output. The CCGT electricity generating station will be designed to run on 100% hydrogen and able to run on 100% natural gas or a blend of natural gas and hydrogen and will be located on land to the west of Keadby 1 and Keadby 2 Power Stations. The Proposed Development includes connections for cooling water, electricity, hydrogen and natural gas, and construction laydown areas and other associated development. It is described in full in **Environmental Statement (ES) Volume I Chapter 4: The Proposed Development (Application Document Ref. 6.2.4)**.
- 1.1.4 The Proposed Development falls within the definition of a 'Nationally Significant Infrastructure Project' (NSIP) under Section 14(1)(a) and Sections 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 electrical output (50MWe). As such, a DCO application is required to authorise the Proposed Development in accordance with Section 31 of the 2008 Act.
- 1.1.5 The DCO, if made by the SoS, would be known as 'The Keadby Next Generation Power Station Order' ('the Order').

1.2. The Applicant

- 1.2.1 The Applicant is a subsidiary of the FTSE-listed SSE, one of the UK's largest and broadest-based energy companies, and the country's leading developer of renewable energy. Over the last 20 years, the SSE Group has invested over £20 billion to deliver industry-leading offshore wind, onshore wind, CCGT, energy from waste, biomass, battery energy storage, energy networks and gas storage projects. Related SSE companies own and operate the adjacent Keadby 1 and 2

Power Stations and have the benefit of the DCO for Keadby 3 Carbon Capture and Storage ('CCS') Power Station (herein referred to as the 'Keadby CCS Power Station').

- 1.2.2 The Proposed Development is being developed with Equinor, one of the country's leading energy providers, supplying natural gas, oil and electricity. Equinor 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.
- 1.2.3 SSE Renewables Limited operates Keadby Windfarm, which lies to the north and south of the Site and generates renewable electricity from 34 turbines, with a total installed generation capacity of 68MW.
- 1.2.4 SSE has set out a clear commitment to investment in low carbon power infrastructure, working with government and other stakeholders to create a Net Zero power system by 2040. This includes investment in flexible sources of electricity generation and storage for times of low renewable output which will complement other renewable generating sources, either using low carbon fuels and/ or capturing and storing carbon emissions.
- 1.2.5 The design of the Proposed Development demonstrates this commitment and the Proposed Development will be built with a clear route to decarbonisation, consistent with SSE's Net Zero Acceleration Programme Plus and net zero transition plan which committed to the development and progression of new low carbon flexible power, including hydrogen-fuelled generation.

1.3. The Proposed Development

- 1.3.1 Designed to run on 100% hydrogen, with the ambition to produce zero emissions at the point of combustion, the Proposed Development would comprise a high efficiency gas fired power station with an electrical output capacity of up to 910Mwe. The power station and associated buildings, structures and plant and other associated development are defined in the Schedule 1 of the Draft DCO (**Application Document Ref. 3.1**) and shown on the Works Plans (**Application Document Ref. 2.3**).

Plate 2.1: The Proposed Development



1.3.2 The Proposed Development will include:

- a new-build CCGT electricity generating station fuelled by hydrogen and/or natural gas with a power output of up to 910MW (Work No. 1) including:
 - a CCGT plant;
 - cooling infrastructure;
 - natural gas and hydrogen blending equipment;
 - supporting facilities including administration and control buildings, workshops, storage buildings, effluent treatment facilities, fire water storage tank(s), demineralised water treatment plant including storage tank(s), and permanent laydown areas for operation and maintenance activities;
- a hydrogen supply pipeline, including a gas compound for the hydrogen supplier's apparatus and a hydrogen gas compound for the Applicant's apparatus (Work No. 2);
- a natural gas supply pipeline including a compound for the natural gas supplier's apparatus and a natural gas compound for the Applicant's apparatus (Work No. 3);
- electrical connection works for the export and import of electricity to and from the generating station and the existing 400kV National Grid Electricity Transmission (NGET) substation located adjacent to the Keadby Power Station site, including works within the substation (which would be undertaken by NGET) (Work No. 4);
- water supply connection works to provide cooling and make-up water to the generating station, including intake structures and an underground and/or

- overground water supply pipeline running between the generating station and the Stainforth and Keadby Canal (Work No. 5);
- connections to and use of an existing outfall and associated pipework for the discharge of used cooling water, surface water and treated effluent to the River Trent (Work No. 6);
 - public water connection pipeline from a new connection on Chapel Lane to provide potable water to the generating station (Work No. 7);
 - new permanent access to the generating station (Work No. 8), comprising:
 - maintenance and improvement of an existing private access road from the A18, including replacement of a private bridge (Mabey Bridge) (Work No. 8A);
 - installation of layby and gatehouse with barriers, enclosures, drainage and lighting north of the A18 junction (Work No. 8B) and associated utilities connections (Work No. 8C); and
 - emergency access route comprising the maintenance and improvement of an existing private track running between the generating station and Chapel Lane and including new private bridge crossing over Glew Drain (Work No. 8D);
 - temporary construction and laydown areas (Work No. 9A);
 - maintenance and improvement of the existing access routes running between the A18 and construction laydown areas (Work No. 9B); and between Skew Bridge adjacent to the A18 and a temporary construction laydown area associated with Mabey Bridge replacement (Work No. 9C);
 - retention, maintenance and improvement and subsequent removal of existing temporary haul route from the Waterborne Transport Offloading Facility (Work No. 9D) and the inspection and repair of the existing wharf, and temporary placement of mobile cranes including the temporary oversailing of crane arms (Work No. 9E);
 - landscaping and biodiversity enhancement measures (Work No. 10); and
 - an allocation of land to meet the requirements of the Carbon Capture Readiness (Electricity Generating Stations) Regulations 2013 (Work No. 11).
- 1.3.3 The Applicant will be responsible for the construction, operation (including maintenance) and eventual decommissioning of the Proposed Development including the on-site connections to electricity, cooling water, hydrogen and natural gas supplies.
- 1.3.4 The Proposed Development will be capable of operating 24 hours per day, 7 days per week with programmed offline periods for maintenance.
- 1.3.5 The route for the hydrogen supply pipeline to the Proposed Development has not yet been confirmed. The supply pipeline is not included in the Proposed

Development and will be progressed by a third party under a separate consent. In line with Government policy, it is recognised that developments, such as the Proposed Development, are needed to stimulate investment in the development of hydrogen production and supply infrastructure.

- 1.3.6 Further detail on the components of the Proposed Development is provided in **ES Volume I Chapter 4: The Proposed Development (Application Document Ref. 6.2.4)**. The areas within which each numbered Work (component) of the Proposed Development are to be built are defined by the coloured and hatched areas on the **Works Plans (Application Document Ref. 2.3)**.
- 1.3.7 The locations of the elements of the Proposed Development described above within the Site are shown in **Figure 3.3: Indicative Parts of the Site Plan** (also included as Figure 1.1 of this Planning Statement) and an Indicative Layout Plan is included as **Figure 4.1** (ES Volume III, **Application Document Ref. 6.4**).
- 1.3.8 The Proposed Development is a ‘first of a kind’ for this type of power station infrastructure project and could represent the UK’s first hydrogen-fired power station. Consequently, at this consenting stage of the project, a number of the design aspects and features of the Proposed Development cannot be confirmed until the detailed design has been completed. For example, the building sizes may vary, depending on the Engineering, Procurement and Construction (EPC) contractor(s) selected and their specific configuration and selection of plant and equipment. It is also important that the consent retains some flexibility to allow for changing economic conditions and the advancement of hydrogen-fired CCGT technology in the period between preparing the Application and starting construction.
- 1.3.9 The need for flexibility extends to the period of time for implementation of the Proposed Development. A period of 5 years is typically granted in development consent orders. In this case, a 7-year period is considered appropriate given that the delivery of hydrogen projects is largely untested and this will be the first project of its kind in the UK, alongside the ongoing Connections Reform process being led by National Energy System Operator which presents uncertainty regarding the development’s predicted connection to the grid. A 7-year period has been applied before, notably in The Rampion 2 Offshore Wind Farm Order 2025.
- 1.3.10 In order to ensure a robust assessment of the likely significance of the environmental effects of the Proposed Development, the Environmental Impact Assessment (EIA) has been undertaken adopting the principles of the ‘Rochdale Envelope’ approach, where appropriate in accordance with the Planning Inspectorate’s Advice Note 9: The Rochdale Envelope (PINS, 2018). This involves assessing the maximum (or where relevant, minimum) parameters for the elements where flexibility needs to be retained (such as the building dimensions or operational modes for example). Where this approach is being

applied to the specific aspects of the EIA, this is confirmed within the relevant chapters of this Planning Statement.

- 1.3.11 Justification for the need to retain flexibility in certain parameters is outlined in this chapter and also in **ES Chapter 4 (Document Ref. 6.2.4)**.
- 1.3.12 Construction of the Proposed Development is described in **ES Chapter 2: Assessment Methodology (Document Ref. 6.2.2)**; **ES Chapter 4: The Proposed Development (Document Ref 6.2.4)**; Construction Programme and Management (**ES Volume I, Application Document Ref. 6.2.5**); and **ES Chapter 6: Consideration of Alternatives (Doc Ref. 6.2.6)**. At this stage in the project development, a detailed construction programme is not available as this is normally determined by the EPC contractor(s) which has/ have not yet been appointed; however, an indicative construction programme is presented within Chapter 5: Construction Programme and Management on which the potential environmental effects of the Proposed Development have been assessed.
- 1.3.13 Construction of the Proposed Development could (subject to the necessary consents being granted and an investment decision being made) start in 2027. Assuming an approximate 3.5-year construction programme followed by a period of commissioning, the Proposed Development is unlikely to commence commercial operation before 2030.
- 1.3.14 It is envisaged that the Proposed Development will be designed to operate for at least 25 years. At that stage, it is expected that the Proposed Development will have some residual life remaining, and an investment decision would then be made based on an assessment of the technical feasibility and the market conditions prevailing at that time.
- 1.3.15 At the end of its operating life, the most likely scenario is that the Proposed Development would be decommissioned. For Environmental Assessment (ES) purposes, it has been assumed that the Proposed Development could operate for longer than 25 years, and in relevant chapters has considered and assessed the potential for operational impacts/ effects to continue beyond this timeframe. If the operating life were to be extended, the Proposed Development would be upgraded in line with the legislative requirements at that time.
- 1.3.16 A combined heat and power (CHP) Assessment has been prepared to accompany the Application (**Application Document Ref. 5.9**), which considers the feasibility of installing CHP.

1.4. The Proposed Development Site

- 1.4.1 The Site (which equates to the 'Order Limits') 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 (Document Ref. 2.1)**. The final Site boundary for the purposes of the DCO Application, including land for associated connections and temporary land required during construction of the Proposed Development, will be refined through ongoing studies and the responses to the Applicant's consultation.

- 1.4.2 The Site encompasses an area of approximately 77.1 hectares (ha), of which approximately 26.7ha of land is proposed for construction laydown.
- 1.4.3 The proposal includes multiple land uses with the different areas described in turn below and shown on **ES Volume III Figure 3.3** Indicative Parts of the Site Plan (**Document Ref. 6.4.4**, appended to this Planning Statement at **Figure 1.1**) and the Works Plans (**Document Ref. 2.3**). These terms have been used throughout this Planning Statement and the ES to describe land use zones within the Site. Distances to environmental receptors reported within the ES are measured relative to the areas illustrated on these plans.
- 1.4.4 The Site is divided into the following areas of permanent and temporary land use (the proposed use is described in more detail in **ES Chapter 4: Proposed Development (Document Ref 6.2.4)**):
- 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.

1.5. Legislative and Decision-Making Framework

- 1.5.1 The consenting regime for this proposal is the PA 2008, Sections 14(1)(a) and 15(1) and (2) of which define NSIPs. Elements of the Proposed Development fall within the definition of an NSIP, notably the onshore generating station, which will have a generating capacity greater than 50MWe. As such, a DCO is required to

authorise this part of the Proposed Development in accordance with Section 31 of the PA 2008.

- 1.5.2 Section 115 of PA 2008 also states that a DCO can include consent for ‘associated development’, that is, development that is not part of, but is associated with the NSIP. This may be development that supports the construction or operation of the NSIP, which helps to address the impacts of the NSIP or is of a type normally brought forward with the particular type of NSIP (here the generating station). The proposed fuel, water and electricity connections would support the operation of the Proposed Development and are considered to be associated development for the purposes of Section 115 of the PA 2008.
- 1.5.3 Under the PA 2008, the policy framework for examining and determining applications for a DCO is provided by the National Policy Statements (‘NPSs’). Section 5 of the PA 2008 allows the SoS to designate NPS setting out national policy in relation to the types of NSIP listed at Section 14 of the 2008 Act. Section 104 of the PA 2008 requires the SoS to determine applications for NSIP in accordance with the relevant NPS unless this would:
- lead to the UK being in breach of its international obligations;
 - be in breach of any statutory duty that applies to the SoS;
 - be unlawful;
 - result in the adverse impacts of the development outweighing the benefits; or
 - be contrary to regulations about how decisions are to be taken.

1.6. The Development Consent Process

- 1.6.1 Sections 42 to 48 of the PA 2008 govern the consultation that the promoter must carry out before submitting an application for a DCO and Section 37 of the PA 2008 governs the form, content and accompanying documents that are required as part of a DCO application. These requirements are implemented through the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 (as amended) (‘APFP Regulations’) which state that an application must be accompanied by an ES, where a development is considered to be ‘EIA development’ under the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (‘the EIA Regulations’).
- 1.6.2 An application for development consent for the Proposed Development has been submitted to the PINS acting on behalf of the SoS. Subject to the Application being accepted (which will be decided within a period of 28 days following receipt

of the Application), PINS will then examine it and make a recommendation to the SoS, who will then decide whether to make (grant) the DCO.

1.7. The Purpose and Structure of this Document

- 1.7.1 The primary purpose of this Planning Statement is to assist the Examining Authority ('ExA') and the SoS in their assessment of the Proposed Development by demonstrating how the Applicant has taken account of relevant planning policy, notably the NPSs for energy infrastructure, and the extent to which the Proposed Development complies with the policies within those NPSs, as well as any other matters that are 'important and relevant' to the SoS's determination of the Application. Such matters include UK Government energy and climate change policy, the National Planning Policy Framework and local planning documents
- 1.7.2 The Planning Statement sets out the key benefits and likely significant adverse environmental effects of the Proposed Development and weighs them in the planning balance. Where relevant, the Planning Statement cross references or 'signposts' the relevant application documents that provide more detail.
- 1.7.3 The structure of the remainder of this Planning Statement is set out in Table 1.1 below.

Table 1.1: Planning Statement Structure

Section	Title	Overview
Section 1	Introduction	Describes the Proposed Development, the application Site and the consenting process.
Section 2	Background	Summarises the site's planning and operational history.
Section 3	Overview of National Policy Statements, UK Energy and Climate Change Policy, National and Local Planning Policy.	Summarises UK energy strategy and the legislative and policy framework for the consideration and determination of DCO applications. Also addresses local planning policy.
Section 4	The Assessment of the Proposed Development Against National Policy	Provides an assessment of the Proposed Development against relevant policy.
Section 5	Assessment of The Benefits and Impacts of the Proposed Development	Identifies the key benefits of the Proposed Development as well as any likely significant adverse effects/impacts and weighs these against each other.

Section	Title	Overview
Section 6	Conclusions	Sets out the conclusions of the Planning Statement in terms of the overall acceptability of the Proposed Development.
Section 7	References	

2. Background

2.1. Planning History

- 2.1.1 This section provides an overview of the planning history at the Site.
- 2.1.2 The Site and surrounding area has an extensive planning history given the scale of industrial development that has taken place over the years. While much of this is of limited relevance to the Proposed Development, there are a number of major development proposals that warrant consideration, either because they relate to land within the Site or adjacent to it. Those of particular relevance are detailed in Appendix 1.
- 2.1.3 Keadby 1 Power Station, located east of the Site, was built on the site of a former coal fired power station which was operational between 1952 and 1984. It was consented in March 1991 and commissioned in 1996.
- 2.1.4 Adjacent to the west of Keadby 1 Power Station, and immediately east of the Site, is Keadby 2 Power Station; a 910MW CCGT power station that was completed in 2023, following the grant of a variation to an existing Section 36 consent in 2016. Keadby 1 and 2 are owned and operated by SSE.
- 2.1.5 A DCO was made in December 2022 for the Keadby 3 Power Station, on the Site that is the subject of this application. The DCO is known as ‘The Keadby 3 (Carbon Capture Equipped Gas Fired Generating Station) Order’ 2022. This consent has not been implemented.
- 2.1.6 Recent unbuilt developments have been taken into account with the assessment of cumulative effects set out in **ES Volume I Chapter 21: Cumulative and Combined Effects (Application Document Ref 6.2.21)** where appropriate.

2.2. Site History

- 2.2.1 Available historic Ordnance Survey maps have been studied to determine the previous land uses within and surrounding the Site, as detailed in **Appendix 13A: Phase 1 Desk Based Assessment (ES Volume II – Application Document Ref. 6.3.19)**. The mapping shows no notable development within the Keadby Power Station site until 1967 – 1969 editions when a power station is shown as having been developed in the central/ eastern area of the Site, with electricity transmission cables and pylons originating from the power station, that span across the centre of the Site. This was a former coal fired power station

which was operational between 1952 and 1984, and which was demolished by the early 1990s.

- 2.2.2 On the 1967 – 1969 editions, railway lines are shown to occupy the south-western area of the Site north of the Stainforth and Keadby Canal, leading towards and terminating at the power station. Adjacent to the railway lines is a conveyor system, which is likely to have been used for the transport of materials and fuels, such as coal, from trains to the power station.
- 2.2.3 An area of marshland is shown as present on the 1967 – 1969 editions in the south-west of the Site north of the Stainforth and Keadby Canal, along with a small refuse heap, with tracks leading to and from this. Three tanks of unknown contents are also shown south and east of the power station and are inferred to be associated with the former power station. Keadby Common Farm is shown as present at the centre of the Site. Drains are mapped within the Site boundary. To the east of the Site, an increase in properties on the 1967 – 1969 editions is noted. A pond and a tank are also shown as present on the eastern-most spur of the Site. Multiple tanks occupy the land south of the power station on the 1978 – 1982 mapping.
- 2.2.4 No notable changes occur at the Site until 1991 – 1994 editions when the power station is mapped as disused. Within the Site to the east, jetties are shown as now present on the River Trent, with a pumping station located inland where the pond and tanks are located. Keadby Common Farm is now absent from mapping.
- 2.2.5 Mapping from 1995 shows that the power station previously present (and disused) is now an electricity generation station and a change in site layout is noted. The railway and conveyor system that was previously present terminating at the power station is now absent from the mapping. A set of small tanks and a single tank is located to the west; five tanks run parallel to the south, and an additional set of tanks are located east of the electricity generation station. Further west from the electricity generation station, towards the centre of the Site, are three large tanks. The refuse heap and area of marsh land to the south-west of the Site are now absent from mapping. A large electricity substation is now present within the north of the Site with electricity transmission cables and pylons connected to the electricity generation station and associated overhead cables leading off-site to the north, south and west. A building and mast are present to the north of the electric generation station. No notable changes are shown on Google Earth imagery from 2003, 2008 and 2015.
- 2.2.6 Extensive historical landfilling has been identified on-site and off-site in close proximity (to the west) (refer to **Section 5.3 of Appendix 13A: Phase 1 Desk Based Assessment (ES Volume II - Application Document Ref. 6.3.19)**). On this basis the Site is considered to represent brownfield land.
- 2.2.7 **Appendix 13A: Phase 1 Desk Based Assessment (ES Volume II - Application Document Ref. 6.3.19)** also describes the historical land-use associated with the The Keadby Next Generation Power Station Project

construction laydown areas south of the railway line (agricultural fields) according to maps from the National Library of Scotland dated 1885, 1905 – 1906 and 1948. These indicate that the access road from the A18 and the proposed construction laydown areas in adjacent agricultural fields were agricultural fields during this time period. Historical maps viewed on Google Earth Pro indicate that this area has been agricultural land and contained a track since 2002. On these maps, North Pilfrey Farm and Pilfrey Farm have been present since 1885. Although there is a data gap between 1948 and 2002, given the surrounding land uses, it is considered likely that the land use remained agricultural during this period.

2.3. Summary

- 2.3.1 The review of planning history indicates that the Site is brownfield in character and has a long history of use for energy infrastructure, notably by SSE and its predecessor companies.

3. Overview of national policy statements, UK energy and climate change policy, National and local planning policy

3.1. Introduction

3.1.1 This section of the Planning Statement summarises the national and local policy background to the Proposed Development. Specifically, it addresses the broad direction of UK policy toward energy and climate change, the NPSs that provide the framework for decisions on NSIPs, such as the Proposed Development, and identifies other relevant legislative and policy matters that the SoS may have regard to in determining applications for development consent.

3.2. Policy Framework

3.2.1 NPSs provide the policy framework for examining and determining applications for DCOs. Other matters can be 'important and relevant' to the SoS's decision (including the Government's energy and climate change policies), but NPSs have primacy in the decision-making process.

3.2.2 In January 2024, the SoS for Energy Security and Net Zero ('DESNZ') designated revised NPSs. Those that are of relevance to the Proposed Development are:

- Overarching National Policy Statement for Energy ('EN-1') (DESNZ, 2024a);
- National Policy Statement for Natural Gas Electricity Generating Infrastructure ('EN-2') (DESNZ, 2024b);
- National Policy Statement for natural gas supply infrastructure and gas and oil pipelines ('EN-4') (DESNZ, 2024c); and
- National Policy Statement for Electricity Networks Infrastructure ('EN-5') (DESNZ, 2023).

3.2.3 EN-1 confirms that decisions on NSIPs should be made on the basis that there is an urgent need for new nationally significant energy infrastructure and that this matter should be given substantial weight.

3.2.4 EN-2 provides technology-specific assessment criteria for natural gas fired electricity generating infrastructure, including site selection and design and climate change adaptation and resilience.

3.2.5 NPS EN-4 covers the general assessment of proposals, including factors influencing site selection and design, climate change adaptation, 'good design', hazardous substances, control of major accident hazards and borehole sites, as

well as the technology-specific information for the applicant assessment, mitigation and SoS decision making related to underground natural gas storage, LNG import facilities, natural gas reception facilities and natural gas and oil pipeline infrastructure.

- 3.2.6 NPS EN-5, together with EN-1, provides the primary policy for decisions by the SoS on applications it receives for electricity networks comprising transmission and distribution systems and also above ground electricity lines (set out in Section 1.6 of EN-5). It provides additional policy on factors influencing site selection and design; biodiversity and geological conservation; landscape and visual; noise and vibration; Electric and Magnetic Fields (EMFs); and Sulphur Hexafluoride.

Consideration of Draft NPSs

- 3.2.7 On 24 April 2025 the Government published revised drafts of NPSs EN-1, EN-3 and EN-5 for public consultation. As yet, no date has been set for the designation of these NPSs.
- 3.2.8 While the current suite of NPSs for energy infrastructure remain relevant Government policy and have effect for the purposes of the PA 2008, the Applicant considers that draft updates to NPSs are a matter that is important and relevant to the SoS's decision-making on the Application. This is clear from the guidance on the process for carrying out a review of existing NPSs, which states:

'Any emerging draft National Policy Statements are potentially capable of being important and relevant considerations in the decision-making process, but the extent to which they are relevant is a matter for the relevant Secretary of State to consider with regard to the specific circumstances of each Development Consent Order application.'

- 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 the 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.

3.3. Marine Policy Statements

- 3.3.1 The Site includes land within the marine area (the tidal River Trent). Accordingly, the appropriate marine policy documents are:
- the UK Marine Policy Statement ('MPS') (HM Government, Northern Ireland Executive, Scottish Government, Welsh Assembly Government, 2011); and

- the East Inshore and East Offshore Marine Plan (Department for Environment, Food and Rural Affairs, 2014).

3.3.2 An assessment against the MPS and the East Inshore and East Offshore Marine Plan is included at Appendix 3 to this Planning Statement.

3.4. UK Energy and Climate Change Policy

3.4.1 National policy on energy and climate change is set out in the NPSs and a body of guidance, plans and strategies. NPS EN-1 (section 2) summarises Government policy. In broad terms, the Government's objectives are to:

- Achieve net zero greenhouse gas ('GHG') emissions by 2050.
- Ensure the security of energy supplies.
- Contribute to sustainable development.
- Achieve the goals set out in the Clean Power 2030 Action Plan.

3.4.2 Achieving these objectives requires a significant amount of new large-scale energy infrastructure. Renewable energy generation, notably wind and solar, are key parts of the strategy for decarbonising the UK's electricity supply and ensuring energy security. However, it is recognised that other generation technologies are required to ensure reliability of supply, given that wind and solar electricity generation is subject to weather conditions that can lead to intermittency. Combustion power stations have the capability to provide dispatchable generation and therefore cover this intermittency. They are, therefore, part of the Government's energy strategy. This includes natural gas-fired power stations. These can be equipped with carbon capture technology (as with the consented Keadby 3 Power Station) but the expectation is that these would be replaced over time with low-carbon alternatives.

3.4.3 One of those alternatives is hydrogen-fired power generation. Hydrogen combustion produces zero emissions at the point of combustion and can replicate the role of natural gas in the electricity system. Its potential has been recognised internationally: 'The Future of Hydrogen' (International Energy Agency, June 2019) sets out the current status of hydrogen as an energy source; the ways in which hydrogen can help to achieve a clean, secure and affordable energy future; and how to realise its potential. The study, carried out in collaboration with governments, industry and academia, contains recommendations for immediate opportunities and for scaling up hydrogen

3.4.4 The report identifies that hydrogen can enable renewables to make an even greater contribution and manage their variable output. The report states that the opportunity should be taken now to scale up technologies and bring down costs to allow hydrogen to become widely used. For hydrogen to make a significant

contribution to the clean energy transition, it needs to be adopted in sectors in which it is currently absent, including transport and power generation.

3.4.5 Seven key recommendations are set out:

- establish a role for hydrogen in long-term energy strategies (including in the power generation sector);
- stimulate commercial demand for clean hydrogen;
- address investment risks of first-movers;
- support research and development to bring down costs;
- eliminate unnecessary regulatory barriers and harmonise standards;
- engage internationally and track progress; and
- focus on four key opportunities to further increase momentum over the next decade:
 - turn existing industrial ports into hubs for lower carbon hydrogen;
 - use existing gas infrastructure to spur new clean hydrogen supplies;
 - support transport fleets, freight and corridors using fuel cell vehicles; and
 - establish shipping routes for international hydrogen trading.

3.4.6 The UK Government has published the UK Hydrogen Strategy (DESNZ, 2021) which looks to address the issues identified above. It states that hydrogen is one of a handful of new, low carbon solutions that will be critical for the UK's transition to net zero. As part of a deeply decarbonised, deeply renewable energy system, low carbon hydrogen could be a versatile replacement for high-carbon fuels used today – helping to bring down emissions in vital UK industrial sectors and providing flexible energy for power, heat and transport.

3.4.7 It further states that there is almost no low carbon production of hydrogen in the UK or globally today. This relates to the need, identified by the International Energy Agency, to stimulate commercial demand for clean hydrogen and reduce investment risk for first-movers. If hydrogen is to fulfil its potential in the UK energy mix a hydrogen economy must be established.

3.4.8 The proposed Keadby Next Generation Power Station would be the first of a new generation of power stations designed to establish end-users for a future hydrogen supply and thereby create a hydrogen economy. This Planning

Statement assesses this and other benefits against the legislative and decision-making framework for NSIPs.

Important and Relevant Matters

3.4.9 In making decisions on NSIPs, the PA 2008 (Section 104) states that the SoS must have regard to any local impact report submitted by a relevant local authority, any relevant matters prescribed in relation to the Proposed Development and any other matters that the SoS thinks are both 'important and relevant'. In the case of the Proposed Development, other matters that are important and relevant may include recent and relevant UK Government energy and climate change policy including national infrastructure plans and assessments:

- National Infrastructure Plan (HM Treasury, 2014);
- the Clean Growth Strategy (Department for Business, Energy & Industrial Strategy (BEIS), 2017);
- The Climate Change Act 2008 (2050 Target Amendment) Order (2019);
- The Future of Hydrogen – Seizing today's opportunities (International Energy Agency, 2019);
- Net Zero – Opportunities for the Power Sector (National Infrastructure Commission, 2020);
- the Energy White Paper (EWP) (Department for Energy Security and Net Zero and BEIS, 2020a);
- UK Hydrogen Strategy (Department for Energy Security and Net Zero, 2021);
- Net Zero Strategy: Build Back Greener (Department for Energy Security and Net Zero and BEIS, 2021);
- British Energy Security Strategy (Department for Business, Energy & Industrial Strategy, 2022);
- Decarbonisation Readiness Consultation (Department for Energy Security and Net Zero, 2023a);
- Powering Up Britain (Department for Energy Security and Net Zero, 2023b);
- Hydrogen to Power Consultation on the Need, and Design, for a Hydrogen to Power Market Intervention (Department for Energy Security and Net Zero, 2024);
- Clean Power Action Plan 2030 (Department for Energy Security and Net Zero, 2024); and
- Clean Flexibility Roadmap (Department for Energy Security and Net Zero, 2025).

3.4.10 All these documents set out important Government objectives for decarbonising the power and industrial sectors, in addition to the Government's target

(enshrined in law) of achieving Net Zero in terms of GHG emissions by 2050. They are addressed in more detail at Appendix 2.

3.4.11 Other matters that the SoS considers to be both important and relevant may include the policies within the National Planning Policy Framework ('NPPF') (MHCLG, 2024), Planning Practice Guidance (PPG) (MHCLG and Department for Levelling Up, Housing and Communities, 2024) and Local Development Plan Documents (DPDs). These are also addressed at Appendix 2.

4. Assessment of The Proposed Development against National Policy

4.1. Introduction

4.1.1 This section provides an assessment of the Proposed Development against the 'assessment principles and generic impacts' set out in NPS EN-1 and also the 'assessment and technology specific considerations' contained within EN-2 and EN-4. The assessments are either made in this document or summarised here with reference to other application documents where the full assessment can be found. Generic Impacts are assessed fully at Appendix 4. An assessment of the conformity of the Proposed Development with the MPS is provided at Appendix 3.

4.2. Assessment Principles

- 4.2.1 Part 4 of EN-1 sets out 'general points' that the SoS should take into account in decision-making on NSIPs, in addition to a number of key assessment principles that both applicants and the SoS should have regard to in preparing and determining applications for development consent.
- 4.2.2 The majority of the assessment principles in EN-1 are of relevance to most types of nationally significant energy infrastructure. A number of these are also referred to within EN-2 and EN-4 in relation to the types of technology that are covered by them in 'assessment and technology-specific information' and are therefore also dealt with below and the relevant part of the NPS is referenced.

General Policies (EN-1, 4.1)

- 4.2.3 EN-1 'General Policies' (section 4.1) reiterates the urgency of the 'need' for the types of infrastructure covered by the energy NPSs and again confirms that the SoS should start with a presumption in favour of granting development consent for energy NSIPs.
- 4.2.4 Paragraph 4.1.5 states that in considering applications for energy NSIPs, and in particular, when weighing their adverse impacts against their benefits, the SoS should consider:
- the potential benefits including the contribution to meeting the need for energy infrastructure, job creation, reduction of geographical disparities, environmental enhancements, and any long-term or wider benefits; and
 - the potential adverse impacts, including on the environment, and including any long-term and cumulative adverse impacts, as well as any measures to avoid, reduce, mitigate or compensate for any adverse impacts, following the mitigation hierarchy.

- 4.2.5 Paragraph 4.1.6 states that in this context, the SoS should take into account environmental, social and economic benefits and adverse impacts, at national, regional and local levels.
- 4.2.6 With regard to this, this Planning Statement at **Section 5** provides an assessment of the key benefits and adverse impacts of the Proposed Development. It shows that the Proposed Development would have a number of substantial benefits and that these clearly outweigh its limited number of adverse impacts.

Requirements and obligations

- 4.2.7 Paragraph 4.1.16 confirms that the SoS should only impose 'requirements' in relation to a development consent where these satisfy relevant guidance and are necessary, relevant to planning, relevant to the development to be consented, enforceable, precise and reasonable in all other respects.
- 4.2.8 The Applicant has included a number of requirements within the draft DCO (**Application Document Ref. 3.1**) that, amongst other matters, are intended to control the detailed design of the Proposed Development in addition to its construction and operation, in order to ensure that it accords with the EIA carried out, and does not result in unacceptable impacts. In preparing the draft requirements the Applicant has had regard to other relevant DCOs and relevant guidance; notably that contained within the NPPF (paragraphs 56-59), the PPG ('Use of planning conditions') and the Planning Inspectorate's Advice Note 15 'Drafting Development Consent Orders'. The requirements are contained in Schedule 2 of the draft DCO and their intended purpose is explained within the Explanatory Memorandum (**Application Document Ref. 3.2**).
- 4.2.9 Paragraph 4.1.18 states that the SoS may take into account any development consent obligations (under **Section 106** of the TCPA 1990 as amended by **Section 174** of the Act) that an applicant agrees with local authorities. To be required development consent obligations must satisfy broadly similar tests to requirements; they must be relevant to planning, necessary to make the development acceptable in planning terms, directly related to the development, fairly and reasonably related in scale and kind to the development and reasonable in all other respects. This is a statutory requirement under section 122 of the Community Infrastructure Regulations 2010.
- 4.2.10 The Applicant's assessment of the Proposed Development, notably through the EIA, has identified some effects that require mitigation. However, the necessary mitigation has either been embedded within the design of the Proposed Development or would be secured through the proposed requirements and therefore, taking into account the above tests, there is no other mitigation that would warrant a development consent obligation in order to make the Proposed Development acceptable in planning terms. The Schedule of Commitments (ES

Volume II **Appendix 22A – Application Document Ref. 6.3.28**) confirms how the mitigation and commitments set out in the ES will be secured.

[Financial and technical feasibility \(EN-1, 4.1.21 – 4.1.22\)](#)

4.2.11 EN-1 paragraph 4.1.21 confirms that in bringing forward energy infrastructure, the Applicant will have made a judgement as to its financial and technical feasibility. It goes on to state that where the SoS considers, based on the information provided in the application, that financial and technical feasibility have been properly assessed, they are unlikely to be relevant to the SoS's decision-making.

4.2.12 With regard to the above, the Applicant has made a decision to proceed with the Application based on a number of commercial and financial considerations. Paragraph 3.2.6 of EN-1 states:

‘It is not the role of the planning system to deliver specific amounts or limit any form of infrastructure covered by this NPS. It is for industry to propose new energy infrastructure projects that they assess to be viable within the strategic framework set by government. This is the nature of a market-based energy system. With the exception of new coal or large-scale oil-fired electricity generation, the government does not consider it appropriate for planning policy to set limits on different technologies but planning policy can be used to support the government’s ambitions in energy policy and other policy areas.’

4.2.13 SSE has a strong track record of bringing forward energy infrastructure across the UK, including Keadby 2 – the most efficient CCGT in Europe – and Keadby Wind Farm, and the Funding Statement (**Application Document Ref. 4.2**) confirms that the Applicant is able to fund any compulsory acquisition that is required to deliver the Proposed Development.

[The Critical National Priority for low carbon infrastructure \(EN-1, 3.3\)](#)

4.2.14 Part 3 of EN-1 establishes that there is a need for significant new energy infrastructure and describes this as a ‘critical national priority’ (at paragraph 3.3.62):

‘Government has therefore concluded that there is a critical national priority (CNP) for the provision of nationally significant low carbon infrastructure. Section 4.2 states what low carbon infrastructure is and therefore what is CNP infrastructure.’

4.2.15 Section 4.2 of EN-1 includes electricity generation that does not involve fossil fuel combustion (such as hydrogen), natural gas fired generation which is carbon

capture ready, and hydrogen distribution infrastructure as meeting the definition of 'low carbon' and therefore critical national priorities.

4.2.16 Part 3 also acknowledges that developing such infrastructure will not be possible without some significant residual adverse impacts. Paragraphs 3.2.6 and 3.2.7 state:

'3.2.6 The Secretary of State should assess all applications for development consent for the types of infrastructure covered by the NPS on the basis that the government has demonstrated that there is a need for those types of infrastructure which is urgent, as described for each of them in this Part.

'3.2.7 In addition, the Secretary of State has determined that substantial weight should be given to this need when considering applications for development consent under the Planning Act 2008.'

4.2.17 Paragraph 3.3.63 states:

'Subject to any legal requirements, the urgent need for CNP Infrastructure to achieving our energy objectives, together with the national security, economic, commercial, and net zero benefits, will in general outweigh any other residual impacts not capable of being addressed by application of the mitigation.'

4.2.18 Part 3 also addresses the roles of individual technologies, including natural gas- and hydrogen-fired plants. Paragraph 3.3.48 acknowledges that some natural gas-fired generation may still be needed even in 2050, but that this can be consistent with the net zero objective if their emissions are balanced by negative emissions from Greenhouse Gas Removal ('GGR') technologies. Hydrogen is recognised at paragraph 3.3.49 as being capable of replicating the role of natural gas in the electricity system, as is the need for a 'strong and enduring UK hydrogen economy'.

4.2.19 The Proposed Development would be capable of operating on 100% hydrogen, 100% natural gas or a blend of the two. It therefore falls within the definition of 'critical national priority' infrastructure, as defined by EN-1 as it, if hydrogen-fired, would comprise onshore electricity generation that does not involve fossil fuel combustion. In the scenario where it is natural gas-fired (or a blend of natural gas and hydrogen), it would comprise natural gas fired generation that is carbon capture ready, which also falls within the definition of 'low carbon infrastructure' and is therefore a critical national priority.

4.2.20 Natural gas may form part of the fuel mix at the start of operation. However, this needs to be seen in the context of the wider energy transition. EN-1 recognises

the role of unabated natural gas electricity generation in the energy transition, notably at paragraph 3.3.17 (emphasis added):

‘As Combined Cycle Gas Turbines (CCGTs) using natural gas and equipped with CCS are unable to provide the quick start peaking capacity which is required in a low carbon system, new unabated natural gas generating capacity will also be needed as it currently plays a critical role in keeping the electricity system secure and stable. It will continue to be needed during the transition to net zero while we develop and deploy the low carbon alternatives that can replicate its role in the electricity system.’

4.2.21 EN-1 also recognises the need to create a ‘strong and enduring’ UK hydrogen economy. This is best achieved by creating the market conditions that encourage investment in domestic hydrogen supply. The establishment of an end-user for hydrogen, in the form of a natural gas-fired power station that is capable of transitioning to hydrogen-fired generation, would create those market conditions. Thus, new natural gas-fired generating capacity, such as the Proposed Development, would encourage the delivery of critical national priorities such as hydrogen-fired power generation (at the Proposed Development itself) and hydrogen distribution infrastructure.

[Alternatives \(NPS EN-1, 4.3.9\)](#)

4.2.22 Paragraph 4.3.9 confirms that as in any planning case, the relevance or otherwise to the decision-making process of the existence (or alleged existence) of alternatives to a Proposed Development is in the first instance a matter of law, which falls outside the scope of the NPS. It goes on, however, to state that from a policy perspective there is no general requirement to consider alternatives or to establish whether a Proposed Development represents the best option, except that:

- Applicants are obliged to include in their ES, as a matter of law, information about the main alternatives they have studied. This should include an indication of the main reasons for the Applicant's choice, taking into account the environmental, social and economic effects and including, where relevant, technical and commercial feasibility (paragraph 4.3.15).
- In some cases, there are specific legislative requirements, notably under the Habitats Directive, for the SoS to consider alternatives. These should be identified in the ES by the applicant.
- In some circumstances, the relevant energy NPSs may impose a policy requirement to consider alternatives; EN-1 does so in Sections 5.4, 5.8 and 5.10 in relation to avoiding significant harm to biodiversity and geological conservation interests, flood risk and development within nationally designated landscapes, respectively.

4.2.23 Information relating to the main alternatives that the Applicant has considered in relation to the Proposed Development are set out at ES Volume I Chapter 6

(Consideration of Alternatives) (Application Document Ref. 6.2.6). This includes the alternatives considered in terms of the Site; technologies and fuels; design options and design evolution; layouts; and temporary construction laydown areas.

- 4.2.24 With regard to the policy requirements of EN-1 to consider alternatives in some circumstances, paragraph 5.4.42 states that as a general principle, development should aim to avoid significant harm to biodiversity and geological conservation interests, including through mitigation and consideration of reasonable alternatives; where significant harm cannot be avoided, then appropriate compensation measures should be sought.
- 4.2.25 It is considered that the assessment of alternatives in relation to biodiversity and geological conservation interests is of more relevance where development has the potential to impact upon European or international sites or national designations.
- 4.2.26 There are no geological interest features either within the vicinity of or at the Site and this has been confirmed by ES Volume I Chapter 13 (Geology, Hydrogeology and Land Contamination) (**Application Document Ref. 6.2.13**).
- 4.2.27 Paragraph 5.8.23 of EN-1 states that the consideration of alternative sites is relevant to the application of the 'Sequential Test' in relation to flood risk, with the preference in the first instance to locate development within Flood Zone 1, the zone of least probability of tidal or fluvial flooding.
- 4.2.28 The Environment Agency's ('EA') 'Flood Map for Planning' (Environment Agency, 2020b) identifies that the majority of the Site and surrounding environs are located within Flood Zone 3, with the exception of a small section of the Site within the 'New Permanent Access from A18', which is in Flood Zone 2. Despite this, it is acceptable in principle for 'Essential Infrastructure' (which includes utility infrastructure that has to be located in flood risk zones for operational reasons - e.g. generating stations that need to be close to a supply of water for cooling) to be located in such zones, provided they are designed and constructed to be able to operate during times of flood, satisfy the 'Exception Test' (i.e. have wider sustainability benefits to the community that outweigh the flood risk) and will be safe from the risk of flooding.
- 4.2.29 The location comprises largely previously developed land and the Proposed Development provides extensive wider sustainability benefits due to its role in providing high amounts of low carbon electricity generation consistent with the urgent need identified in NPS EN-1 paragraph 3.3.58 and which is corroborated by recent policy in the EWP and recent official evidence from the CCC and NIC. The Proposed Development therefore satisfies the Exception Test, with ES Volume I Chapter 12, (Water Environment and Flood Risk) (**Application Document Ref. 6.2.12**) and ES Volume II Appendix 12A: Flood Risk Assessment

(**Application Document Ref. 6.3.16**) demonstrating that it would be safe and not result in significant effects in terms of flooding.

4.2.30 Paragraph 5.10.32 of EN-1 indicates that the consideration of alternatives can also be relevant where development involves land that is subject to national landscape designations, such as National Parks or Areas of Outstanding Natural Beauty.

4.2.31 ES Volume I Chapter 14 'Landscape and Visual Amenity' (**Application Document Ref. 6.2.14**) confirms that the Study Area is located within two National Character Areas ('NCAs'). The Site and the majority of the Study Area falls within NCA 39: Humberland Levels. The east of the Study Area falls within NCA 45 Northern Lincolnshire Edge with Coversands.

4.2.32 The Applicant's consideration of alternatives in relation to the Proposed Development, as set out in the ES, is therefore considered to be both appropriate and proportionate.

Health

4.2.33 EN-1 (paragraph 4.4.2) identifies certain direct impacts that might affect the health and wellbeing of the population. The table below sets out these impacts and where they are assessed in the ES.

Table 3.1: Potential Direct Impacts and Relevant ES Chapter

Potential Direct Impact	Relevant ES Chapter
Increased traffic	Chapter 10 Traffic and Transport (Application Document Ref. 6.2.10)
Air or water pollution	Chapter 8 Air Quality (Application Document Ref. 6.2.8) Chapter 12 Water Environment and Flood Risk (Application Document Ref. 6.2.12)
Dust, odour	Chapter 8 Air Quality (Application Document Ref. 6.2.8)

Hazardous waste and substances	Chapter 20 Materials and Waste (Application Document Ref. 6.2.20)
Noise	Chapter 9 Noise and Vibration (Application Document Ref. 6.2.9)
Exposure to radiation	Chapter 17 Population and Human Health (Application Document Ref. 6.2.17)
Increase in pests	Statutory Nuisance Statement (Application Document Ref. 5.3)

4.2.34 In all matters, the residual effects after mitigation are not significant. Mitigation measures will be secured through requirements in the DCO.

[Criteria for 'good design' in energy infrastructure \(NPS EN-1, 4.7; EN-2, 2.4.28; EN-4, 2.4 and EN-5, 2.4\)](#)

4.2.35 EN-1 (paragraph 4.7.1) recognises that the functionality of buildings and infrastructure, including fitness for purpose and sustainability, are as equally important as visual appearance and aesthetic considerations. Section 4.7 goes on to state that applying 'good design' to energy proposed developments should produce sustainable infrastructure sensitive to place, efficient in the use of natural resources and energy used in their construction and operation, matched by an appearance that demonstrates 'good aesthetic' as far as possible. It is however acknowledged that '...the nature of much energy infrastructure development will often limit the extent to which it can contribute to the enhancement of the quality of the area (paragraph 4.7.2).

4.2.36 Paragraph 4.7.3 of EN-1 notes that 'good design' is also a means by which many policy objectives in the NPSs can be met, for example, the impact sections (of EN-1) show how good design, in terms of siting and use of appropriate technologies can help mitigate adverse impacts such as noise. Applicants are required to ensure that good design is embedded within the project development, with development principles established from the outset (paragraph 4.7.5). Paragraph 4.7.6 states:

4.2.37 'Whilst the applicant may not have any or very limited choice in the physical appearance of some energy infrastructure, there may be opportunities for the applicant to demonstrate good design in terms of siting relative to existing landscape character, landform and vegetation. Furthermore, the design and sensitive use of materials in any associated development such as electricity

substations will assist in ensuring that such development contributes to the quality of the area. Applicants should also, as far as is possible, seek to embed opportunities for nature inclusive design within the design process’

4.2.38 Paragraph 4.7.10 confirms that in assessing applications, the SoS will need to be satisfied that energy infrastructure developments are sustainable and, having regard to regulatory and other constraints, are as attractive, durable and adaptable (including taking account of natural hazards such as flooding) as they can be. In doing so, it goes on to state (at paragraph 4.7.11) that the SoS should be satisfied that:

‘...the applicant has considered both functionality (including fitness for purpose and sustainability) and aesthetics (including its contribution to the quality of the area in which it would be located, any potential amenity benefits, and visual impacts on the landscape or seascape) as far as possible.’

4.2.39 Paragraph 4.7.7 stresses the importance of applicants being able to demonstrate in their application documents how the design process was conducted and how the proposed design evolved. However, it also makes clear that in considering applications, the SoS should take into account the ultimate purpose of the infrastructure and bear in mind the operational, safety and security requirements, which the design has to satisfy (paragraph 4.7.12).

4.2.40 EN-2 (paragraph 2.4.28) states that in relation to natural gas electricity generating infrastructure, the need for good design will be particularly important where a national designated landscape is affected. Good design is also identified as the primary mitigation for noise impacts (paragraph 2.5.10).

4.2.41 EN-4 (paragraph 2.4.2) states that in relation to gas infrastructure, applicants should demonstrate good design as per section 4.7 of EN-1.

4.2.42 EN-5 (paragraph 2.4.2) also states that proposals for electricity network infrastructure should demonstrate good design as per section 4.7 of EN-1. Paragraph 2.4.3 goes on to state that ‘electricity networks infrastructure must in the first instance be safe and secure, and that the functional design constraints of safety and security may limit an applicant’s ability to influence the aesthetic appearance of that infrastructure.’ Paragraph 2.4.4 requires design principles to govern design to the fullest extent, but this should not be at the expense of security and safety.

4.2.43 The Design and Access Statement (‘DAS’) (**Application Document Ref. 5.6**) provides an explanation as to how the design of the Proposed Development has evolved in the lead up to the submission of the Application. It sets out how the Applicant has demonstrated ‘good design’ in respect of the Proposed Development, taking account of the recognition in EN-1 that the functionality of

buildings and infrastructure, including fitness for purpose and sustainability, are equally important as visual appearance and aesthetic considerations.

- 4.2.44 The DAS describes how account has been taken of the Site's context and the design process that has been followed, including the broad approach that has been taken to the design of the Proposed Development and how this has changed and evolved throughout the pre-application process taking account of relevant design, technical and other factors.
- 4.2.45 The DAS notes that the immediate context for much of the Site is formed and dominated by the extensive industrial complex of the Keadby Power Station site, which contains the two gas fired power stations Keadby 1 and Keadby 2, along with their respective infrastructure. The immediate context has therefore been significantly altered by human activity and development and is therefore not particularly sensitive to change. EN-1 states that applying 'good design' to energy NSIPs should produce sustainable infrastructure sensitive to place, efficient in the use of natural resources and energy used in their construction and operation, matched by an appearance that demonstrates 'good aesthetic' as far as possible. It is however acknowledged that '...the nature of much energy infrastructure development will often limit the extent to which it can contribute to the enhancement of the quality of the area (Paragraph 4.7.2)'.
- 4.2.46 The final design of the Proposed Development is functional, reflecting its purpose and the context within which it will sit. In terms of siting and layout, the main buildings and structures are set well within the plot and have been grouped together where feasible from a technical and safety perspective to consolidate the built form.
- 4.2.47 The final design of the Proposed Development is functional, reflecting its purpose and the context within which it will sit. In terms of siting and layout, the main buildings and structures are set well within the plot and have been grouped together where feasible from a technical and safety perspective to consolidate the built form.
- 4.2.48 The individual chapters of the ES explain how the Proposed Development has been designed, including the mitigation embedded in its design, to minimise and mitigate impacts. ES Volume II Appendix 22: Schedule of Commitments (**Application Document Ref. 6.3.28**) sets out how such mitigation will be secured.
- 4.2.49 Further detail of the appearance of the Proposed Development will be the subject of requirements and therefore, future assessment. Details of the external

appearance will need to be provided and approved under a requirement of Schedule 2 of the draft DCO (**Application Document Ref. 3.1**).

4.2.50 It is accepted in EN-1 that enhancement of an area is difficult due to the nature of energy infrastructure. However, the design of the Proposed Development reflects its immediate context, the need for functionality and fitness for purpose, all of which are relevant to achieving 'good design'. In this context, the Proposed Development represents 'good design' for the purposes of energy infrastructure and policy set out EN-1, EN-2, EN-4 and EN-5.

[Consideration of combined heat and power \('CHP'\) \(NPS EN-1, 4.6; and EN-2, 2.3.2-2.33\)](#)

4.2.51 EN-1 (paragraph 4.8.1) confirms that CHP is the generation of useable heat and electricity in a single process. A CHP station may either supply steam direct to customers or capture waste heat for low-pressure steam, hot water or space heating purposes after it has been used to drive electricity generating turbines. The heat can also be used to drive absorption chillers, thereby providing cooling.

4.2.52 Paragraph 4.8.3 goes on to state that CHP is technically feasible for all types of thermal generating stations, including those fired by hydrogen. To be economically viable (paragraph 4.8.6) as a CHP plant, a generating station needs to be located close to industrial or domestic customers with heat demands. The distance will vary according to the size of the generating station and the nature of the heat demand. The provision of CHP is most likely to be cost-effective and practical where it is included as part of the initial design and is part of a mixed-use development.

4.2.53 Paragraph 4.8.14 of EN-1 requires the SoS to have regard to the Department of Trade and Industry (DTI) 2006 guidance, or any successor to it, when considering CHP aspects of applications for thermal generating stations. That guidance requires any application to develop a thermal generating station under Section 36 of the Electricity Act 1989 (or the Planning Act 2008) to either include CHP or contain evidence that the possibilities for CHP have been fully explored'. Since the publication of the DTI Guidance, in 2013 the EA has published its own 'CHP Ready Guidance for Combustion and Energy from Waste Plants'.

4.2.54 Where CHP is not feasible, paragraph 4.8.13 emphasises the need for applicants to demonstrate how the design of the development provides for the future provision of CHP (i.e. that it is 'CHP Ready').

4.2.55 EN-2 (paragraph 1.6.2 refers back to section 4.8 of EN-1 for guidance on CHP.

4.2.56 The Applicant has assessed the feasibility of CHP in accordance with EN-1, EN-2 the EA's guidance. This assessment is reported within the 'Combined Heat and Power Assessment' (**Application Document Ref. 5.8**). A Requirement of

Schedule 2 of the draft DCO (**Application Document Ref. 3.1**) requires that this be periodically reviewed.

4.2.57 There are a number of theoretical identified heat users within a 15km radius of the Site. Although there are large heat loads related to domestic, small industrial and education within the study area, none of these currently offer economically viable opportunities for a heat network. CHP is therefore not proposed to be installed from the outset, but the Proposed Development will be CHP ready, with the inclusion of connection flanges at suitable locations to export waste heat in the future should this become viable. This is considered to be Best Available Technique ('BAT') for plant such as the Proposed Development

Carbon Capture and Storage (CCS)

4.2.58 CCS does not form part of the Proposed Development, which is an alternative to the consented Keadby 3 CCS-enabled development. Obtaining consent for both of these technologies (CCS and hydrogen) enables the Applicant to pivot to whichever decarbonisation pathway becomes technically and commercially viable at the site first.

4.2.59 In order to satisfy the current Carbon Capture Readiness regulations, the Proposed Development includes an area of land that is reserved for carbon capture and storage infrastructure.

Climate change adaptation and resilience (NPS EN-1, 4.10; EN-2, 2.3; EN-4 2.3; and EN-5, 2.3)

4.2.60 EN-1 (paragraph 4.10.8) states that new energy infrastructure will typically need to remain operational over many decades, in the face of a changing climate. Consequently, applicants must consider the direct and indirect impacts of climate change, such as potential for increased flooding, storms, heatwaves and wildfires when planning the location, design, build, operation and, where appropriate, decommissioning of new energy infrastructure. The ES should set out how the proposal will take account of the Proposed Development's impact on climate change. While not required by the EIA Directive, this information will be needed by the SoS.

4.2.61 EN-2 (paragraph 2.3.3) notes that as natural gas generating stations are likely to be proposed for coastal or estuarine sites and climate change is likely, for example, to increase risks from flooding or rising sea levels; applicants should in particular set out how the proposal would be resilient to coastal changes and increased risk from tidal and storm surge; the increased risk of flash flooding for inland projects; the effects of higher temperatures, including higher temperatures

of cooling water, and increased risk of drought leading to a lack of available cooling water. These matters should be assessed in the ES.

4.2.62 EN-4 (paragraph 2.3.4) states that gas pipelines and other infrastructure should be resilient to increased risk of flooding; effects of rising sea levels and increased risk of storm surge; higher temperatures; increased risk of earth movement or subsidence from increased risk of flooding and drought; and any other increased risks identified in the applicant's assessment.

4.2.63 EN-5 (paragraph 2.3.2) refers to the need to consider the effects of flooding, particularly upon substation infrastructure, winds and storms on overhead lines, higher temperatures leading to increased transmission losses and earth movement or subsidence caused by flooding or drought on underground cables.

4.2.64 ES Volume I Chapter 18 (Climate Change and Sustainability) (**Application Document Ref. 6.2.18**) provides information and considers the potential vulnerability of the Proposed Development to climate change and the potential effects of flooding in relation to the Proposed Development, including rising sea levels and tidal surge. The Chapter is supported by the Climate Change Risk Assessment at ES Volume II Appendix 18A (**Application Document Ref. 6.3.25**). These assessments conclude that, subject to implementation of recommended adaptation measures, there would be no significant risks associated with the 34 risks identified, including the overarching climate risks of flooding, changing temperatures and storm events.

4.2.65 The draft DCO includes Requirements relating to 'Surface Water drainage', 'Foul water drainage' and 'Flood risk mitigation' that require the submission of details for approval prior to the commencement of works on the relevant part of the Proposed Development relating to surface, foul water drainage and flood risk mitigation respectively.

4.2.66 It is therefore considered that the Proposed Development would mitigate the effects of climate change, while its design would ensure that it is resilient to the future potential effects of climate change. The Proposed Development therefore complies with the NPSs.

4.2.67 It is considered that the above matters are suitably considered in ES Volume I Chapter 13 (Geology, Hydrogeology and Land) (Application Document Ref. 6.2.13) and Chapter 18 (Climate Change and Sustainability) (Application Document Ref. 6.2.18). The above conclusions are therefore unaffected.

[Network connection \(NPS EN-1, 4.11; and EN-2, 2.2.10 - 2.2.11\)](#)

4.2.68 EN-1 (paragraph 4.11.1) states that the connection of a generating station to the electricity network is an important consideration for applicants. It is for the applicant to ensure there will be the necessary infrastructure and capacity within

the transmission and distribution network to accommodate the electricity generated (paragraph 4.11.2). While it is not necessary for an applicant to have received or accepted a formal grid connection offer at the time of submitting an application for a DCO and this is at the applicant's risk, the SoS will want to be satisfied that an appropriate network connection will be in place for a given project (paragraph 4.11.12).

- 4.2.69 EN-2 (paragraphs 2.4.18-2.4.21) highlights that the technical feasibility of the export of electricity from a generating station is dependent on the capacity of the grid network together with the voltage and distance of the connection. Furthermore, applicants will usually have assured themselves that a viable connection exists before submitting an application for a DCO and where they have not done so they take a commercial risk. Even if the precise route of a connection has not been identified, in accordance with Section 4.11 of EN-1 any application must include information on how the generating station is to be connected and whether there are any particular environmental issues likely to arise from that connection.
- 4.2.70 The existing electrical infrastructure in the area comprises 132 kV and 400 kV overhead lines as well as underground cables that serve existing substations.
- 4.2.71 In order to export electricity from the Proposed Development, engagement is ongoing with NGET to identify the preferred connection option including any upgrades to existing switchgear or other existing equipment that may be required. The Proposed Development will require a direct connection to the 400kV system and will connect to the existing National Grid 400kV Substation directly to the east of the Site. The connection between the Proposed Development and existing 400kV substation would comprise 400kV electrical cables which would be installed either above ground or below ground, or a combination of both (**Work No. 4A**) and is referred to as the Electrical Connection Area to National Grid 400kV Substation (as shown on Figure 3.3 (ES

Volume III – **Application Document Ref. 6.4.4**). NGET will be responsible for the relevant connection works.

- 4.2.72 The Applicant has prepared a 'Electricity Grid Connection Statement' (**Application Document Ref. 7.1**) in order to satisfy the requirements of APFP Regulation 6(1)(a)(i) and Section 4.11 of EN-1.
- 4.2.73 The Applicant is engaging with the National Energy System Operator (NESO) Connections Reform process in order to ensure it continues to have a confirmed grid connection offer for the Proposed Development
- 4.2.74 It is considered that the Grid Connection Statement demonstrates that it is feasible to connect the Proposed Development to the electricity network and that the necessary agreements to facilitate this would be forthcoming.

[Pollution control and other environmental regulatory regimes \(NPS EN-1, 4.12\)](#)

- 4.2.75 Section 4.12 of EN-1 (paragraph 4.12.1) advises that issues relating to discharges or emissions which lead to direct or indirect impacts on terrestrial, freshwater, marine, onshore, and offshore environments, or which include noise and vibration may be subject to separate regulation under the pollution control framework or other consenting and licensing regimes.
- 4.2.76 Paragraph 4.12.9 states that in considering an application for development consent, the SoS should focus on whether the development itself is an acceptable use of the land, and on the impact of that use, rather than the control of processes, emissions and discharges themselves. The SoS should work on the assumption that the relevant pollution control regime and other environmental regulatory regimes will be properly applied and enforced by the relevant regulator (paragraph 4.12.10).
- 4.2.77 Paragraph 4.12.6 notes that many proposals covered by EN-1 will be subject to the Environmental Permitting ('EP') Regulations. Paragraph 4.12.7 advises applicants to make early contact with relevant regulators, such as the EA, to discuss their requirements for EPs and other consents. This will ensure that applications take account of all relevant environmental considerations and that the relevant regulators are able to provide timely advice and assurance to the SoS. Where possible, applicants are encouraged to submit applications for EPs and other necessary consents at the same time as applying to the SoS for development consent (paragraph 4.12.8).
- 4.2.78 The Schedule of Other Consents and Licenses document (**Application Document Ref. 5.4**) lists the other consents and licences that are required for the Proposed Development that are being/will be advanced separately of the DCO Application. Table 1 of the Schedule of Other Consents and Licenses

document lists the relevant consents and licences and details the discussions that have taken place to date with the relevant regulators.

4.2.79 The Other Consents and Licences document provides evidence that the Applicant is progressing the 'non-DCO' consents and licences required for the Proposed Development in a timely manner and indicates that there would be no impediment to these consents and licences being forthcoming. The Applicant will continue to progress the necessary consents and licences throughout the pre-examination period and, if required, during the examination and will update the document accordingly.

4.2.80 It is relevant to note that the draft DCO (**Application Document Ref. 3.1**) includes several requirements that would have the purpose of controlling the effects of the Proposed Development in terms of discharges and emissions during construction and operation in order to prevent pollution and safeguard amenity.

[Safety \(NPS EN-1, 4.13\) and Control of Major Accident Hazards \(EN-4, 2.6\)](#)

4.2.81 EN-1 paragraph 4.13.1 states that the Health and Safety Executive ('HSE') is responsible for enforcing a range of health and safety legislation, some of which is relevant to the construction, operation and decommissioning of energy infrastructure. Applicants should consult with the HSE on matters relating to safety.

4.2.82 Paragraph 4.13.3 confirms that some energy infrastructure will be subject to the 'Control of Major Accident Hazards' ('COMAH') Regulations 2015. These are aimed at preventing major accidents involving dangerous substances and limiting the consequences to people and the environment of any that do occur.

4.2.83 EN-4 (paragraph 2.6.1) highlights that gas supply infrastructure is subject to stringent safety standards under COMAH.

4.2.84 ES Volume I Chapter 19 (Major Accidents and Disasters) (**Application Document Ref. 6.2.19**) presents an assessment of the Major Accidents and Disasters ('MA&D') that have the potential to arise during the construction, operation and decommissioning of the Proposed Development. This includes an assessment of the reasonably foreseeable worst-case environmental consequences (i.e. the likely significant effects), the measures envisaged to prevent or mitigate the likely significant adverse effects of such events on the environment, and details of the preparedness for and proposed response to

MA&D hazards and threats relevant to the construction, operation and decommissioning of the Proposed Development.

- 4.2.85 The underlying objective of the assessment was to identify appropriate precautionary actions, to prevent or mitigate potentially significant risks associated with MA&D.
- 4.2.86 The assessment has identified the potential MA&D which could be applicable to the Proposed Development, associated with the substances present and operations to be undertaken. Principally, these could include fires, explosions and the release of Carbon Dioxide ('CO₂') gas. These incidents have an extremely low probability of occurrence but could have significant impacts on people and the environment without mitigation.
- 4.2.87 The Proposed Development will be within an area of North Lincolnshire where similar facilities such as power plants and chemical works have been in operation for many years, including Keadby Power Station owned by SSE. Consequently, these hazards are well understood by plant operators and controlled by the regulatory authorities. SSE will draw on this expertise, in addition to its own experience of designing, building and operating major power generation facilities globally to reduce the risk of major accidents occurring to ALARP (As Low As Reasonably Practicable).
- 4.2.88 The engineering design of the Proposed Development will incorporate appropriate standards, proven design methods and control measures necessary to reduce the risks of such accidents to an acceptable level, i.e. ALARP, which is the standard expected by the regulatory authorities (HSE and EA).
- 4.2.89 The Proposed Development will require appropriate permissions to be in place for its operation including a COMAH licence, if required and an Environmental Permit, and these regulatory controls will stipulate a number of requirements that must be demonstrated to prevent or minimise the effects of major accidents.
- 4.2.90 With the implementation of these measures in addition to those described in Chapter 19, the MA&D risks are considered to have been mitigated to 'tolerable if ALARP' and therefore the effects are considered as 'not significant' for both plant construction and operation

[Hazardous Substances \(NPS EN-1, 4.14 and EN-4, 2.5\)](#)

- 4.2.91 EN-1, paragraph 4.14.1, confirms that all establishments wishing to hold stocks of certain hazardous substances above a certain threshold need 'Hazardous

Substances Consent' ('HSC'). Applicants should consult the HSE at the pre-application stage if a Proposed Development is likely to need such consent.

4.2.92 EN-4 (paragraph 2.5.2) states that the Hazardous Substances Authority ('HAS') is usually the local planning authority. The HAS will, in the case of non-nuclear activities, consult the EA.

4.2.93 As confirmed above, a COMAH licence application may require to be submitted to the HSE prior to construction once the volumes of hazardous substances have been established.

4.2.94 Further information on this is provided in the Schedule of Other Consents and Licences (**Application Document Ref. 5.4**) which identifies the additional consents and licences that will be required for the Proposed Development and includes the COMAH and HSC applications.

[Common law nuisance and statutory nuisance \(NPS EN-1, 4.15\)](#)

4.2.95 Paragraph 4.15.5 of EN-1 states that at the application stage of an energy NSIP, possible sources of nuisance under Section 79(1) of the Environmental Protection Act ('EPA') 1990, and how they may be mitigated or limited should be identified by the Applicant so that appropriate requirements can be included in any subsequent order granting development consent.

4.2.96 The Applicant has prepared a Statutory Nuisance Statement (**Application Document Ref. 5.3**) that identifies the matters set out at Section 79(1) of the EPA in respect of statutory nuisance and considers if the Proposed Development could result in a nuisance and the measures, where relevant, to prevent and mitigate such nuisance occurring. Section 4 of the Statutory Nuisance Statement provides an assessment of the potential for nuisance taking account of the assessments undertaken for the EIA. The matters considered include the condition/state of premises; smoke; fumes or gases; dust, steam, smell or other effluvia; accumulations or deposits; keeping of animals; insects; artificial light; noise; and any other matter declared by enactment to be statutory nuisance. A number of matters are not relevant to the Proposed Development and are of more relevance to other form of infrastructure (e.g. insects in respect of waste facilities).

4.2.97 Taking account of mitigation, no statutory nuisance effects are considered likely to occur as a result of the Proposed Development. Mitigation is both embedded within the design of the Proposed Development and mitigation and controls will be secured during both construction and operation by a number of requirements (**Schedule 2 of the draft DCO – Application Document Ref. 3.1**).

Furthermore, the operation of the Proposed Development would be regulated by

the EA through environmental permitting and would be subject to regular monitoring and reporting.

Security considerations (NPS EN-1, 4.16)

- 4.2.98 Paragraph 4.16.1 states that national security considerations apply across all national infrastructure sectors. Paragraph 4.16.4 states that Government policy is to ensure that, where possible, proportionate protective security measures are designed into new infrastructure Proposed Developments at an early stage in the project development. Where applications for development consent for infrastructure relate to potentially critical infrastructure, there may be national security considerations, which will be identified to the relevant government department (DESNZ).
- 4.2.99 The Proposed Development will be secure and the Applicant will consult with the appropriate bodies prior to construction in respect of security considerations and measures. A Requirement relating to 'Site security' in Schedule 2 of the draft DCO (**Application Document Ref. 3.1**) requires the submission and approval of a written scheme detailing security measures to minimise the risk of crime.
- 4.2.100 The Proposed Development therefore accords with the key assessment principles of the energy NPSs.

4.3. National Policy Statements: Generic Impacts

- 4.3.1 The 15 'generic impacts' set out in Part 5 of EN-1 are considered at Appendix 4: Generic Impacts. Where the same impacts appear in the 'assessment and technology-specific information' parts of EN-2, EN-4 and EN-5 they are also dealt with at Appendix 5 and the relevant part of the NPS is referenced.
- 4.3.2 In the final column of Appendix 4 references are made to key mitigation commitments that are secured in the Draft DCO (**Application Document Ref. 3.1**). However, for a comprehensive list of mitigation commitments please refer to the Schedule of Commitments at ES Appendix 22A (**Application Document Ref. 6.3.28**). The ES will be a certified document under the Draft DCO.
- 4.3.3 Table 3.3 below summarises the assessment of generic impacts.

Table 3.3: Summary of Generic Impacts Assessment

Generic Impact	Summary of Assessment
Air quality and emissions	No significant or combined adverse effects
Greenhouse gas emissions	<p>The proposal will actively support grid decarbonisation and therefore aligns with Government policy. The measures set out in the Greenhouse Gas Reduction Strategy (Application Document Ref. 7.8) will ensure that all reasonable steps are taken to reduce greenhouse gas emissions through the construction, operational and decommissioning stages of the development.</p> <p>The Proposed Development, once constructed, will be the most efficient natural gas-fired generating station in Europe. Its emissions will fall still further when using hydrogen, a fuel that produces zero emissions at the point of combustion.</p>
Biodiversity and geological conservation	<p>It has been possible to design and position the Proposed Development with reference to the existing baseline conditions and through so doing avoid potential pathways for impact. As a consequence no significant adverse residual construction, operation or decommissioning effects are anticipated.</p> <p>Proposals to achieve benefits for biodiversity are described in the Outline Landscape and Biodiversity Enhancement and Management Plan Report (Application Document Ref. 5.10) and secured by a requirement in the Draft DCO.</p>
Civil and military aviation and defence interests	No significant or combined adverse effects.

Coastal change	No notable or significant adverse effects anticipated.
Dust, odour, artificial light, smoke, steam and insect infestation	No statutory nuisance effects likely to occur due to embedded mitigation and controls.
Flood risk	No significant or combined effects – Site is in Flood Zone 3 but Exception Test passed.
Historic environment	No significant or combined adverse effects.
Landscape and visual	Significant adverse effects identified from several assessed viewpoints. Not capable of mitigation.
Land use, including open space, green infrastructure, and Green Belt	No notable or significant adverse effects anticipated.
Noise and vibration	No significant or combined adverse effects due to mitigation.
Socio-economic impacts	No significant or combined adverse effects.
Traffic and transport	Negligible impacts identified; no significant or combined adverse effects.
Resource and waste management	No significant or combined adverse effects subject to Site Waste Management Plan (SWMP) and Construction Environment Management Plan (CEMP).
Water quality	Neutral to slight adverse residual effects; not significant due to mitigation.

4.4. National Policy Statements: Assessment and technology specific considerations

- 4.4.1 The technology specific considerations of relevance to the Proposed Development that are contained within EN-2, EN-4 and EN-5 (and that have not already been addressed in Table 6.2 above) are considered in Appendix 5.

4.5. Marine Policy Statements

- 4.5.1 As noted earlier in this document, the Proposed Development does not affect the wider marine environment, and involves only temporary, and no permanent works in the tidal River Trent. These comprise the oversailing by mobile crane arms of the River Trent (Work No. 9E), and water supply connection works (Work No. 5).
- 4.5.2 The UK Marine Policy Statement and East Inshore and East Offshore Marine Plans policies of relevance to the Proposed Development are considered in Appendix 3.

4.6. The National Planning Policy Framework

- 4.6.1 Paragraph 7 of the NPPF sets out the purpose of the planning system, which is to contribute to the achievement of sustainable development, summarised as ‘meeting the needs of the present without compromising the ability of future generations to meet their own needs’. Paragraph 8 goes on to identify three dimensions to sustainable development: economic, social and environmental, which it states are interdependent and must be pursued in mutually supportive ways. It explains that these dimensions give rise to the need for the planning system to perform a number of key roles as follows:
- **An economic objective** – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;
 - **A social objective** – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural well-being; and
 - **An environmental objective** – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising

waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy

- 4.6.2 Central to the NPPF is 'a presumption in favour of sustainable development'. This is highlighted at Paragraph 11. For decision-making, this means approving applications that accord with the development plan without delay.
- 4.6.3 The NPPF is supportive of infrastructure projects. One of the methods of fulfilling the objective of sustainable development listed at paragraph 8a is through the 'provision of infrastructure,' with the important role that infrastructure should play highlighted in Chapter 3 (Plan-Making).
- 4.6.4 NPPF policies of particular relevance include building a strong, competitive economy; promoting sustainable transport; achieving well-designed places; meeting the challenge of climate change; flooding and coastal change; conserving and enhancing the natural environment; and conserving and enhancing the historic environment.
- 4.6.5 The Proposed Development accords with these core land-use planning principles as follows:
- it would contribute toward sustainable economic development by providing new low carbon electricity generating capacity, for which there is a confirmed need, thereby contributing to the security and diversity of energy supplies for businesses and homes;
 - the Design and Access Statement (**Application Document Ref. 5.6**) demonstrates that the Proposed Development is appropriate in terms of its context and setting and incorporates the principles of 'good design', while the ES demonstrates that it would not result in unacceptable impacts on the amenity of people living in the surrounding area;
 - the Proposed Development would support the transition to a low carbon future;
 - it has been designed to be resilient to flooding and would not increase the risk of flooding at the Site or elsewhere;
 - the ES demonstrates that the Proposed Development would conserve the natural environment and it includes measures to enhance landscaping and biodiversity at the Site, while it would not result in significant effects in terms of pollution;
 - much of the Site involves former or existing industrial, brownfield land;
 - while the assessment of traffic and transport in the ES for the Proposed Development is based on a worst-case scenario, it demonstrates the transport effects would be acceptable. The transport implications during operation will be very minor.

4.6.6 A summary of the NPPF policies of most relevance to the Proposed Development and how it complies with these is provided at Appendix 6.

4.7. Local Planning Policy and Designations

4.7.1 The Site is located within the administrative boundary of NLC which represents the host local authority for the Proposed Development. The development plan documents produced by NLC therefore represent the statutory development plan for the Proposed Development.

4.7.2 The local development plan for the Proposed Development therefore comprises the following DPDs':

- North Lincolnshire Local Development Framework Core Strategy (the 'Core Strategy') (NLC, 2011) - adopted June 2011;
- North Lincolnshire Local Development Framework Housing and Employment Land Allocations DPD (the 'Allocations DPD') (NLC, 2016) - adopted March 2016; and
- Saved Policies of the North Lincolnshire Local Plan (the Local Plan) (Local Development Frameworks Government Office for Yorkshire and The Humber, 2007) - adopted May 2003, saved September 2007.

4.7.3 An overview of the above DPDs, in so far as they contain planning allocations/designations (and related policies) of relevance to the Proposed Development is provided below. The relevant policies are set out below while the Proposed Development is assessed against said policies at Section 5.

Core Strategy

4.7.4 The North Lincolnshire Local Development Framework Core Strategy does not contain any allocations or designations relevant to the Proposed Development or its Site, however, it does denote Keadby Wharf as one of the area's 'Ports and Wharves' and policies CS1, CS11, CS12 and CS6 are of relevance.

Housing and Employment Land Allocations DPD

4.7.5 Keadby Wharf is allocated as a 'Wharf Location' and Keadby Lock as an 'Ancient Monument' in the North Lincolnshire Local Development Framework Housing and Employment Land Allocations DPD, meaning policies IN10 and HE8 are of relevance, respectively. The Site is located largely outside of settlement

boundaries although parts of the proposed connection routes lie within the settlement limit of Keadby.

Local Plan

- 4.7.6 The Inset and Proposals Maps related to the North Lincolnshire Local Plan were superseded by the Housing and Employment Land Allocations DPD explained above.
- 4.7.7 Appendix 7 considers the compliance of the Proposed Development with the relevant statutory development plan policies.
- 4.7.8 Given that EN-1, EN-2, EN-4 and EN-5 provide the primary basis upon which any decision on the Application should be made, combined with the fact the matters covered by these local planning policies have for the most part already been considered in detail above in relation to the NPSs, in general a summarised response has been made to each policy.
- 4.7.9 The Proposed Development conforms with most local plan policies. The exception is Policy LC7 Landscape Protection, which looks to protect the 'scenic quality and distinctive local character of the landscape.' ES Chapter 14 Landscape and Visual Amenity (**Application Document Ref. 6.2.14**) has found that there would be a conflict with this policy through a significant adverse effect on visual amenity from Viewpoints 1 (Chapel Lane West, Keadby); 2 (Gate Keepers Residence, Vazon Bridge, Keadby); and 4 (Public Right of Way ('PRoW') (KEAD9, KEAD10) north of Keadby). It is not possible to mitigate this effect and so no mitigation is proposed. The conflict with policy must be weighed in the planning balance.

4.8. Summary

- 4.8.1 This section of the Planning Statement has considered the Proposed Development's conformity against the assessment principles, generic impacts and assessment and technology specific consideration of the relevant energy NPSs (EN-1, EN-2, EN-4 and EN-5), the MPSs and the development plan for the area. These are the primary basis for the determination of development consent applications for energy infrastructure.
- 4.8.2 The Proposed Development, whether hydrogen or natural gas fired, will comprise low carbon infrastructure that is a critical national priority. If hydrogen-fired, it will be onshore electricity generation that does not involve fossil fuel combustion. If natural gas-fired, it will be carbon capture ready. In either scenario it would meet the EN-1 definition of low carbon infrastructure and be a critical national priority.
- 4.8.3 Significantly, the Proposed Development supports the objective, set out in EN-1, of establishing a strong and enduring UK hydrogen economy. It does so by

establishing an end user for hydrogen in the form of a natural gas-fired – but hydrogen enabled – power station. This aligns with the recognition in the NPS of the need for fossil fuel combustion in the energy transition. In this way, the proposal supports the wider NPS objectives of achieving Net Zero by 2050, ensuring that energy supplies remain secure, and contributing to sustainable development.

- 4.8.4 The Applicants' assessment has not identified any conflicts with NPS and MPS policy. One conflict with local planning policy has been identified, regarding impact upon the landscape. This cannot be mitigated and must be weighed in the planning balance (noting that the NPSs have primacy over local policy).

5. Assessment of the Benefits and Adverse Impacts of The Proposed Development

5.1. Introduction

5.1.1 This section of the Planning Statement identifies the key benefits of the Proposed Development as well as its likely significant operational (permanent) adverse effects having regard to the policy assessment within **Section 3** and the EIA that has been undertaken.

5.2. Benefits of the Proposed Development

5.2.1 The Proposed Development would have a number of very clear and substantial benefits, which can be summarised as follows:

1. The Proposed Development is designed to run on 100% hydrogen, which produces zero emissions at the point of combustion, supporting the UK's long-term decarbonisation goals by providing backup low-carbon power to renewable generation.

5.2.2 Although the Proposed Development will generate GHG emissions across its lifecycle, it will play a key role in decarbonising the UK energy sector in line with government policy by providing the capacity to produce low carbon energy from hydrogen, a fuel which emits zero carbon emissions at the point of combustion. The electricity generated will replace higher-carbon sources, actively supporting grid decarbonisation. Increasing the capacity of low-carbon energy available to the grid will facilitate the decarbonisation of the wider economy. The Proposed Development aligns with current and emerging government policy and is crucial to achieving the UK's net-zero trajectory.

5.2.3 Decarbonisation of the electricity grid is essential given the legal requirement to achieve net zero emissions by 2050. For this reason it should be given **substantial weight** in the planning balance.

2. The Proposed Development will contribute to the delivery of low-carbon, dispatchable electricity generating infrastructure, a critical national priority

5.2.4 The Proposed Development is a major investment by the Applicant in low carbon electricity generation and could be deployed by the early-2030s, providing 892MW (gross capacity) of dispatchable generation for 25 years or more, a significant contribution towards the critical national need for low carbon electricity generation established in NPS EN-1. This need has become more urgent following the coming into law of the Climate Change Act 2008 (2050 Target

Amendment) Order 2019, i.e. Net Zero by 2050, and the publication of the Clean Power 2030 Action Plan.

- 5.2.5 The Clean Flexibility Roadmap, published in July 2025, identifies the need for short duration and long duration flexibility in the UK's power supply. It defines 'clean flexibility' as follows:

'Clean flexibility is the ability to shift in time or location the demand or supply of electricity, over hours, days or seasons, while reducing emissions. It includes storing clean energy for times when demand outstrips supply, offering rewards to consumers who choose to shift demand away from peak times, importing and exporting electricity, and generating low carbon dispatchable power.'

- 5.2.6 Within this is the need for short and long duration flexibility. Short duration flexibility encompasses technologies that can respond to changes in supply and demand over minutes to several hours. Long duration flexibility technologies respond to needs over a daily, weekly or seasonal period, most notably by continuing to supply reliable, secure, low carbon electricity when output from renewable sources is low, for example when winds are low and output from windfarms drops. Hydrogen to Power ('H2P') is identified as a key provider of low carbon inter-seasonal dispatchable energy.
- 5.2.7 Natural gas-fired plants are identified in EN-1 as having a role in achieving net zero by 2050. **Substantial weight** should therefore be applied in the planning balance.

3. The Proposed Development will stimulate the creation of a hydrogen economy

- 5.2.8 The Proposed Development would act as a catalyst for the creation of a 'strong and enduring UK hydrogen economy' (NPS EN-1 paragraph 3.3.49) 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 (set out in NPS EN-1) for 10 Gigawatts ('GW') of electricity supply being generated by hydrogen fired power stations. The Site's location in the Humber Industrial Cluster makes the delivery of hydrogen more likely as there has been significant recent progress on hydrogen production, storage and transport proposals in this region. Notable projects include:

- Tees Green Hydrogen (EDF Power Solutions)
- Teeside Green Hydrogen (MorGen Energy)
- Lyhfe Wallsend (Lhyfe SA)
- Aldborough Hydrogen Pathfinder (Aldborough Pathfinder Ltd)
- Project Union (National Gas)

5.2.9 This is in addition to £500 million of Government funding for creation of a regional hydrogen transport and storage network, focussed on areas including the Humber and Teeside.

5.2.10 These projects, and the Proposed Development, will support the Humber Industrial Cluster Plan for decarbonisation of the largest carbon emitting clusters in the UK.

5.2.11 EN-1 establishes that there is an urgent need for new nationally significant electricity infrastructure and that substantial weight should be given to this need when considering applications for development consent. Hydrogen is specifically identified as having an important role in meeting this need and so **substantial weight** should be applied in this case.

4. The Site is already in use for power generation

5.2.12 Large parts of the Site are within the ownership or control of SSE and the generating station would be situated on brownfield land adjoining and within an existing power station with existing electricity grid, gas supply, and cooling water supply infrastructure, thereby minimising the need for new connections and third-party land. The location affords important efficiencies in terms of the operation and maintenance of the Proposed Development, also potentially reducing land and staffing (trip generation) compared to a development not situated at an existing power station.

5.2.13 The use of brownfield land as a first priority is a long standing planning principle that is supported by national policy. The fact that the Site is located on such land should be given **significant weight**.

5. The Proposed Development would bring significant employment and economic benefits to the local area

5.2.14 Significant beneficial local and regional impacts would result from the direct, indirect and induced employment created by the construction phase of the Proposed Development on the Scunthorpe TTWA and associated economy, as identified in Chapter 16: Socio-economics of the ES Volume II (**Application Document Ref. 6.2.16**). Notably:

- 663 new direct jobs during the construction phase, 331 of which would be from the Scunthorpe area.
- Indirect employment arising from indirect and induced effects of construction activity. This is expected to generate a further 152.5 jobs in the Scunthorpe area and 305 overall.
- 58 new direct jobs during the operational phase (50 from the Scunthorpe area).

5.2.15 These employment benefits should be given **significant weight** in the planning balance.

6. Biodiversity net gain (BNG)

5.2.16 Although there is no planning policy or legal requirement to deliver a specific quantum of BNG (with demonstration of a quantifiable gain being sufficient), the Applicant's assessment indicates that the increase in habitat, hedgerow and watercourse units is consistent with the 10% minimum BNG threshold to be mandated by the Environment Act 2021 for NSIP developments from May 2026. Likely gains are estimated as follows:

- increase of 11.90 habitat units (+10.08%);
- increase of 3.49 hedgerow units (+30.16%); and
- increase of 2.68 watercourse units (+10.04%).

5.2.17 The Applicant suggests that **moderate weight** should be given to this in the planning balance.

7. Community benefits

5.2.18 The operator of the Keadby 2 power station, which like the Applicant is part of the SSE Group, has an established Community Liaison Officer in place for the existing operational site at Keadby. SSE intends to maintain this role as the Applicant's (Keadby Next Generation Limited) point of contact for the community throughout both the construction and operational phase of the Proposed Development. In addition, SSE hosts a Community Liaison Group, fostering dialogue with local parish council representatives and ward councillors. SSE also manages a community fund derived from another project, supporting local initiatives, alongside ongoing educational outreach efforts with the nearby school. The draft DCO includes a requirement to amend the terms of reference for the existing Community Liaison Group to include the Proposed Development. These initiatives will therefore continue, ensuring sustained and meaningful engagement with the community during construction and operation of the Proposed Development.

5.2.19 The Applicant suggests that **moderate weight** should be given to this in the planning balance.

5.3. Adverse Effects of the Proposed Development

5.3.1 The Proposed Development would give rise to a small number of unavoidable adverse effects of significance, as identified in Chapter 22: Summary of Likely

Residual Effects of ES Volume I (**Application Document Ref. 6.2.22**). These are summarised below.

1. [Landscape and visual impact](#)

- 5.3.2 The assessment has determined that the Proposed Development is likely to result in a significant adverse effect on visual amenity during all assessment scenarios from Viewpoints 1 (Chapel Lane West, Keadby); 2 (Gate Keepers Residence, Vazon Bridge, Keadby); and 4 (PRoW (KEAD9, KEAD10) north of Keadby). Since it is considered that mitigation measures would not be effective in reducing this visibility, none are proposed. As such, these significant adverse residual effects will remain. The Design and Access Statement (**Application Document Ref. 5.6**), sets out potential additional measures that could be undertaken by the Applicant in relation to colour and materials of the generating station (**Work No. 1**), and compliance is secured by Requirement 5 in Schedule 2 of the Draft DCO (**Application Document Ref. 3.1**).
- 5.3.3 Although there would be an impact on these views, none would be on any protected landscape. The weight to be given to this impact should therefore be no more than **moderate**.

2. [Development in the Countryside](#)

- 5.3.4 The Proposed Development is located in open countryside and parts of the temporary works (parts of **Work No. 9A**) are located on higher grades of agricultural land. While this is not precluded by NPS policy, local policy sets criteria for the development of such land, and this could be important and relevant in decision making under S104 of the PA 2008. However as demonstrated at Appendix 7 to this Planning Statement, the Proposed Development is consistent with these criteria, as it constitutes a form of economic development at an existing established employment site, it would be unsuitable within the development boundaries of North Lincolnshire's towns, and it will be located largely on previously used land and making use of existing structures and infrastructure, consistent with the NLC spatial strategy policy on rural development. It is located in an area already characterised by substantial power infrastructure including overhead lines and will not be out of keeping with the character of the area. Appropriate controls have been included, notably the maximum dimensions of larger structures via Schedule 10 of the Draft DCO (**Application Document Ref. 3.1**). In addition, screening and landscaping proposals are set out in a LBMEP (**Application Document Ref. 5.11**). The Design and Access Statement (**Application Document Ref. 5.6**) includes design principles and explains how the use of greenfield and agricultural land for temporary construction purposes was minimised through a selection process that maximised the use of brownfield land. A Soil Resources Survey will be covered in

the final CEMP, as controlled by a Requirement in Schedule 2 of the draft DCO (**Application Document Ref. 3.1**).

5.3.5 For these reasons, the location of the Site on previously developed land in the countryside should be given no more than **moderate weight**.

4. Flood Risk

5.3.6 The Proposed Development is located in Flood Zone 3 (fluvial flood risk). NPS EN-1 requires application of the Sequential Test to proposals in areas at risk of flooding. The aim of this test is to ensure that areas at little or no risk of flooding from any source are developed in preference to areas at higher risk, where it is compatible with sustainable development objectives to do so.

5.3.7 The potential to locate the Proposed Development in alternative locations has been considered by the Applicant. Section 6.3 of ES Chapter 6 Alternatives (**Application Document Ref. 6.2.6**) sets out the reasons the Proposed Development should be located at the Site. These are:

- the Site is suitably located to connect to the developing hydrogen supply network, which includes National Grid's Project Union (a national hydrogen transmission network for the UK, connecting hydrogen production and storage to hydrogen consumers) and Northern Gas Networks' proposed local hydrogen transmission network (East Coast Hydrogen project);
- the Site has excellent links to existing infrastructure including electrical grid and gas (specifically the National Grid electricity and natural gas transmission networks); water (given proximity to both the Stainforth and Keadby Canal and River Trent) and transport (A18 and M180 as well as waterborne options);
- the Site is located largely within the boundary of the existing Keadby Power Station site (and associated land within the ownership or control of the Applicant);
- the Main Site is a brownfield site, which is considered more appropriate to redevelop for large scale power generation than an alternative greenfield site, and has no existing major structures requiring demolition, treatment and removal;
- the location of the Main Site minimises interference with the Landscape and Creative Conservation Plan for Keadby 2 Power Station and specifically, the Habitat Management Areas secured via Conditions 31-34 inclusive of the Section 36 consent for Keadby 2 Power Station;
- the Main Site provides sufficient space to accommodate the required scale of a single high efficiency combined cycle gas turbine (CCGT) unit, without encroaching on the exclusion areas for the Keadby Wind Farm turbines to the north, the former Keadby Ash Tip to the west and the existing overhead lines to the south and east; and

- the Site is located largely within the boundary of the existing Keadby Power Station site (and associated land within the ownership or control of the Applicant); and
- the Main Site is located in close proximity to the existing Keadby 1 and Keadby 2 Power Stations, providing opportunities for synergies and efficiencies for the Proposed Development, such as shared use of the existing cooling water discharge infrastructure and existing access routes.

5.3.8 None of these sites are at lower risk of flooding than the Proposed Development Site. It follows that there are no sequentially superior sites that could reasonably accommodate the Proposed Development, and the Sequential Test is passed. In any case, the sustainability benefits of the proposed location are significant and would outweigh any such benefit of locating it elsewhere.

5.3.9 The NPPF requires the application of the Exception Test where the proposal is for essential infrastructure in Flood Zone 3. There are two requirements of this test. It must be demonstrated that:

- The project would provide sustainability benefits to the community that outweigh flood risk; and
- The project will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible will reduce flood risk overall.

5.3.10 The sustainability benefits of the Proposed Development lie in its delivery of low carbon electricity generating infrastructure – a critical national priority in NPS EN-1 – that will help establish a hydrogen economy that will, in turn, enable the delivery of other low carbon infrastructure. It will assist in providing security of supply and dispatchable power consistent with the urgent need identified in NPS EN-1 and which is corroborated by recent policy in the EWP, the Net Zero Strategy, the Clean Power 2030 Action Plan, and in the recent official evidence from the CCC and NIC.

5.3.11 Regarding the second requirement of the Exception Test, the flood defences are sufficient to prevent overtopping during events with a 0.5% annual probability, the overall sensitivity to fluvial flooding is therefore considered ‘Low’ and the Proposed Development to be safe for its lifetime.

5.3.12 The Proposed Development therefore satisfies the Exception Test, with ES Volume I Chapter 12, (Water Environment and Flood Risk) (**Application Document Ref. 6.2.12**) and ES Volume II Appendix 12A: Flood Risk Assessment (**Application Document Ref. 6.3.16**) demonstrating that it would be safe and not

result in significant effects in terms of flooding. The EA has reviewed the Flood Risk Assessment at various stages pre-application.

5.3.13 The weight given to the fact that the Site is within an area of flood risk should be given **neutral weight** in the planning balance. Even if this were not the case and some weight were given to flood risk, this would be comprehensively outweighed by the sustainability benefits.

5. Greenhouse Gases (GHG)

5.3.14 NPS EN-1 states in paragraph 5.3.6, ‘Applicants should look for opportunities within the proposed development to embed nature-based or technological solutions to mitigate or offset the emissions of construction and decommissioning’. Paragraph 5.3.7 further states ‘Steps taken to minimise and offset emissions should be set out in a GHG Reduction Strategy, secured under the Development Consent Order.’

5.3.15 The Applicant’s assessment of the Proposed Development’s GHG emissions is set out in ES Chapter 18 Climate Change and Sustainability (**Application Document Ref. 6.2.18**) and the strategy for reducing GHG emissions is set out in the Greenhouse Gas Reduction Statement (**Application Document Ref. 7.8**). The following points are relevant:

- Over its lifetime, the Proposed Development will support the UK to fulfil its net zero policy and transition away from fossil fuels, as hydrogen has zero emissions at the point of combustion. By adding a reliable source of low-carbon electricity, the Proposed Development will facilitate the decarbonisation of the UK Grid. The Proposed Development plays a role in decarbonising the electricity grid and transition to net zero by 2050.
- While the Proposed Development has a role to play in helping the UK’s electricity grid to decarbonise, it is still important to reduce GHG emissions associated with the Proposed Development where possible. These GHG reductions can be driven by implementation of a GHG Reduction Strategy, in particular implementation of the opportunities outlined in the Decarbonisation Tracker. These are set out in the Greenhouse Gas Reduction Statement (**Application Document Ref. 7.8**). Potential carbon reduction opportunities identified are grouped into the following categories:
 - Strategy and Governance;
 - Innovative Design;
 - Lower Carbon Products; and
 - Lean Construction Techniques.

- 5.3.16 This strategy is secured in the draft DCO (**Application Document Ref. 3.1**) and implementation of it will ensure compliance with the requirements of NPS EN-1.
- 5.3.17 Despite the Proposed Development initially operating unabated it is clear that the proposal is aligned with Government policy on transitioning away from fossil fuel combustion.
- 5.3.18 Regarding the assessment of this matter by the SoS, NPS EN-1 paragraph 5.3.12 confirms that operational emissions are a matter that should be managed on a whole economy and not an individual application basis:

‘Operational emissions will be addressed in a managed, economy-wide manner, to ensure consistency with carbon budgets, net zero and our international climate commitments. The Secretary of State does not, therefore need to assess individual applications for planning consent against operational carbon emissions and their contribution to carbon budgets, net zero and our international climate commitments.’

- 5.3.19 This being the case, there is no need to attribute any weight to the matter of carbon emissions for the Proposed Development.

5.4. The Planning Balance

- 5.4.1 This section has identified a number of very clear and substantial benefits that the Proposed Development would deliver and enable. Most notably, the Proposed Development can support the Government’s ambitions of achieving Net Zero by 2050, ensure security of energy supplies and contribute to sustainable development.
- 5.4.2 It is the Applicant’s intention that the Proposed Development would operate on 100% hydrogen fuel. With zero carbon emissions at the point of combustion this first of a kind technology will help to decarbonise electricity generation. As the hydrogen fuel supply required for 100% hydrogen operation may not be available from the start of operations, Keadby Next Generation Power Station would also be able to operate using natural gas or a blend of hydrogen and natural gas until a technically and commercially viable hydrogen supply becomes available to the site.
- 5.4.3 The NPSs recognise the role and importance of natural gas-fired electricity generation in the energy transition and such generation forms part of the Government’s overall strategy. In either scenario, it would fall within the EN-1 definition of low carbon infrastructure that is a critical national priority, being

either onshore generation that does not involve fossil fuel combustion (hydrogen) or carbon capture ready natural gas fired generation.

- 5.4.4 Secondly, the power station can offer low-carbon, dispatchable electricity that can cover for the intermittency inherent in renewable energy generation.
- 5.4.5 Use of hydrogen fuel for electricity generation can support the establishment of a hydrogen economy. As a potential consumer of hydrogen, it creates a market opportunity for hydrogen production. Hydrogen-ready projects such as the Proposed Development are essential for driving up the demand for hydrogen to stimulate investment in its production and transmission infrastructure. The sooner the demand for hydrogen exists, the sooner the supply is likely to become more readily available. Therefore, the Proposed Development has a crucial part to play in helping the UK Government meet its policy ambitions for a low carbon future.
- 5.4.6 These benefits are aligned with the overall purpose of the NPSs and Government policy on decarbonisation of the energy sector generally. This benefit, which is secured in the DCO, must be given substantial weight in the planning balance
- 5.4.7 In contrast, few significant adverse effects have been identified. These are unavoidable and arise due to the scale of the Proposed Development, which its electricity generation function renders inevitable, and the low-lying nature of the Site.
- 5.4.8 It is therefore considered that the benefits of the Proposed Development considerably outweigh its limited adverse impacts.

6. Conclusions

- 6.1.1 The Proposed Development is the first of its kind: a power station designed from the outset to operate on hydrogen, a fuel that produces zero emissions at the point of combustion. It will also be capable of operating on natural gas, or a blend of natural gas and hydrogen and this dual fuel capability makes it ideal for encouraging the development of a hydrogen supply as part of a wider hydrogen economy.
- 6.1.2 The Proposed Development, whether operating on hydrogen or natural gas (for which it would be carbon capture ready), would comprise low carbon infrastructure, which as EN-1 makes clear, is a critical national priority. Such dispatchable power generation is important for supporting the growth of renewable energy, as it can provide cover for the intermittency that is inherent with renewable energy generation.
- 6.1.3 It is therefore aligned with Government policy on increasing the supply of secure, dispatchable low carbon electricity and encouraging the establishment of a hydrogen economy.
- 6.1.4 Decisions on DCO applications where a NPS is designated are made against the criteria in **Section 104** of the PA 2008. Section 5 of this Planning Statement sets out conclusions corresponding to the criteria in **Section 104** subsection (2)(a)-(d) and subsections (3)-(9).
- 6.1.5 The Proposed Development has been demonstrated, in **Sections 4 and 5**, to be in conformity with the relevant NPSs. In particular:
- the need case set out in NPS EN-1 for all types of energy infrastructure, including low carbon electricity generating infrastructure, has been demonstrated to be of particular urgency and relevance by reference to a range of recent Government energy and climate change law, policy and guidance. The Proposed Development will contribute in a timely manner to this urgent need.
 - the Proposed Development is in conformity with all relevant ‘generic impacts’ and ‘assessment and technology specific considerations’ in the NPSs, as detailed in **Section 4**, and **Appendices 4 and 5**, including in respect of air quality and emissions; biodiversity and geological conservation; sources of

potential nuisance; flood risk; historic environment; landscape and visual; land use; noise and vibration; socio-economic; traffic and transport; waste management; water quality and resources; site selection; pipeline safety; soil and geology; and EMFs, by reference to the findings in the Environmental Statement Volumes I-III (**Application Document Refs, 6.2 – 6.4**) and other application documents.

- The conformity with the UK MPS and the East Inshore and East Offshore Marine Plans is confirmed in Appendix 3.
- With regard to Section 104 subsection (3) of the 2008 Act, granting consent for the Proposed Development in accordance with the relevant energy NPSs would not be in conflict with Section 104 subsections (4) to (8). Notably, it would not conflict with Regulations 3 to 7 of the Infrastructure Planning (Decisions) Regulations 2010 in relation to listed buildings, conservation areas and scheduled monuments; deemed consents under the Marine and Coastal Access Act 2009; hazardous substances; or biological diversity.

- 6.1.6 Other matters important and relevant to the acceptability of the Proposed Development include the overarching aims of the NPPF and the Local Plan. **Appendices 6 and 7** confirm that the Proposed Development appropriately addresses these matters.
- 6.1.7 It is important and relevant that the Proposed Development would support the objectives of Government policy in that it would help establish a hydrogen economy by providing an end-user for a future hydrogen supply.
- 6.1.8 No other laws, statutory duties or enactments indicate against making the DCO. The Habitats Regulations Assessment Screening Report (**Application Document Ref. 5.2**), Water Framework Directive Assessment (**Application Document Ref. 6.3.17**) do not present concerns. The Statement of Reasons (**Application Document Ref. 4.1**) demonstrates that all reasonable alternatives to compulsory acquisition have been explored, and the proposed interference with the rights of those with an interest in the Order Land is necessary, proportionate and legitimate. No serious detriment to statutory undertakers would arise and appropriate protective provisions are included in the Order.
- 6.1.9 The Proposed Development has a number of clear and substantial benefits, which NPS EN-1 accords weight, and which considerably outweigh its limited adverse impacts, as set out in **Section 4**.
- 6.1.10 The DCO includes appropriate requirements (Schedule 2) that would control the detailed design of the Proposed Development and its construction, operation and decommissioning in order to ensure that it accords with the robust assessment

reported in the Environmental Statement Volumes I-III (**Application Document Refs, 6.2 – 6.4**) and would not result in unacceptable effects.

- 6.1.11 It is the Applicant's view therefore that the Proposed Development's very clear and significant benefits, a number of which should be afforded very substantial weight by the SoS, outweigh its limited adverse residual impacts.
- 6.1.12 Notwithstanding the Applicant's view that the very clear and significant benefits of the Proposed Development outweigh its limited adverse residual impacts, the Proposed Development is CNP infrastructure (as confirmed in EN-1), and CNP policy places a clear presumption in favour of granting consent for such infrastructure even where residual effects remain after the application of the mitigation hierarchy. Indeed, EN-1 states (paragraph 4.2.15) that for projects which qualify as CNP infrastructure, where residual non-HRA or non-MCZ impacts remain after the mitigation hierarchy has been applied, these residual impacts are unlikely to outweigh the urgent need for this type of infrastructure. Paragraph 4.2.16 continues by stating that the SoS will take as the starting point for decision-making that such infrastructure is to be treated as if it has met any tests which are set out in the NPSs, or any other planning policy, which requires a clear outweighing of harm, exceptionality or very special circumstances.
- 6.1.13 The DCO includes appropriate requirements (Schedule 2) that would control the detailed design of the Proposed Development and its construction and operation in order to ensure that it accords with the robust assessment reported in the Environmental Statement Volumes I-III (**Application Document Refs, 6.2 – 6.4**) and would not result in unacceptable effects.

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Appendix 1 : Relevant Planning History

NO.	REFERENCE NO.	DESCRIPTION	LOCATION	STATUS
1.	SI 2022/ 1396	The Keadby 3 (Carbon Capture Equipped Gas Fired Generating Station) Order 2022	Keadby Power Station, Trentside, Keadby, Scunthorpe DN17 3EF	DCO made 7 December 2022; came into force 29 December 2022.
2.	PA/2020/952	Planning permission for the creation of a biodiversity enhancement area (comprising the use of 70,000 cubic metres of excavated soil)	Land north-west and west of Keadby Power Station, Keadby, DN17 3EF (in Keadby, Crowle and Belton Parishes)	Recommended for approval by planning officers but refused – 26 March 2021 It is understood that a new application will not be made as a different means of beneficial reuse of the soil off site has been identified.
3.	PA/2021/188	Planning permission to amend conditions 7 and 8 of PA/2019/1595 to extend the time period for the restoration of the site and decommissioning of the haul road on land east of Keadby Power Station, Keadby	Land east of Keadby Power Station, Keadby	Approved – 19 March 2021
4.	PA/2019/1940	Proposed substation alterations under The Town & Country Planning (General Permitted	Sub Station, Chapel Lane, Keadby	No objection – 4 December 2019

NO.	REFERENCE NO.	DESCRIPTION	LOCATION	STATUS
		Development) (England) Order 2015, Schedule 2, Part 15, Class B		
5.	PA/2019/1595	Planning permission to erect a temporary haul road to accommodate Abnormal Vehicle Loads and the construction of two ditch crossings	Land east of Keadby Power Station, Keadby	Approved – 15 November 2019
6.	PA/2019/1554	Planning permission to construct a foundation to support a temporary mobile crane including associated works	Keadby Railway Wharf, Trent Side, Keadby	Approved – 11 November 2019
7.	PA/SCR/2019/6	EIA Screening request for the proposed temporary construction of a haul road	Land at and adjacent to the Keadby Power Station Site, Keadby	Not EIA Development – 22 August 2019
8.	PA/2019/519	Planning permission to install an underground high voltage (400kV) electric cable and associated works	Land at and adjacent to Keadby Power Station, Trent Side, Keadby, DN17 3EF	Approved – 31 May 2019
9.	Section 36 – Keadby II	Construction and operation of a second CCGT with an output of 710 MW	Keadby Power Station	Consent varied – 01 March 2019 (Original consent given – 10 September 1993)
10.	PA/2018/1950	Planning permission to retain existing construction	Adjacent Land, South of Pilfrey Bridge, Crowle	Approved – 23 November 2018

NO.	REFERENCE NO.	DESCRIPTION	LOCATION	STATUS
		laydown and parking area for the period of four years in connection with the Keadby 2 Power Station Project		
11.	PA/2018/1436	Application for a non-material amendment following a grant of planning permission PA/2017/1977 dated 11/5/2018	Works in the parishes of Keadby with Althorpe, Burringham, Flixborough, Amcotts, Gunness, West Butterwick and East Butterwick	Approved – 27 July 2018
12.	PA/2017/1557	Planning permission to change the use of a residential dwelling (Use Class C3) to offices (Use Class B1) and install nine roller-shutters to existing windows	Red House, Chapel Lane, Keadby, DN17 3EW	Approved – 24 July 2018
13.	PA/2017/1977	Planning permission for the construction of a Flood Defence Scheme comprising of sheet piling along the right bank of the River Trent; the placing of scour protection along the right bank of the River Trent; localised property protection within a managed	Works in the parishes of Keadby with Althorpe, Burringham, Flixborough, Amcotts, Gunness, West Butterwick and East Butterwick	Approved – 11 May 2018

NO.	REFERENCE NO.	DESCRIPTION	LOCATION	STATUS
		overflow area at land to the north of the M180 Bridge; the raising of existing earth embankments and flood walls; and associated construction works.		
14.	PA/2016/1878	Consent under Section 37 of the Electricity Act 1989 to install a new 400kV overhead electricity line	Keadby Power Station, Trent Side, Keadby, DN17 3EF	No objection – 5 January 2017
15.	PA/2016/1678	Consent under Section 37 of the Electricity Act 1989 to install replacement 400kv overhead electric line	Keadby 1 Replacement Overhead Line, Keadby Power Station, Trent Side, Keadby, DN17 3EF	No objection – 05 January 2017
16.	PA/2011/0385	Planning permission for the installation of a photovoltaic field array including perimeter fencing and a plant room	Land To The Rear Of, 22 Trent Side, Keadby, DN17 3EF	Appeal allowed – 30 May 2012
17.	WF/2011/1310	Planning permission for a minor material amendment to WF/2003/1630 dated 31/03/2005 increasing the diameter of the consented turbine rotor dimension up to 101m (maximum tip height to remain at 125m)	Keadby Power Station, Trent Side, Keadby, DN17 3EF	Approved – 7 March 2012

NO.	REFERENCE NO.	DESCRIPTION	LOCATION	STATUS
18.	PA/2011/0583	Planning permission to construct new sections of internal permanent access tracks and track widening	Keadby Windfarm Site, Keadby, DN17 3BP	Approved – 27 July 2011
19.	PA/2010/0961	Planning permission to construct a permanent bridge structure across the Stainforth and Keadby Canal and railway utilising existing track and abutment structures at the site	Land West Of, Keadby, Either Side Of The Stainforth And Keadby Canal, Keadby	Approved – 17 November 2010
20.	PA/2008/0214	Planning permission to erect a storage building	Keadby Power Station, Trent Side, Keadby, DN17 3EF	Approved – 04 April 2008
21.	PA/2006/1168	Planning permission to construct an additional distillate tank located next to the existing tanks and construct one demineralised water storage tank	Scottish And Southern Energy Plc, Keadby Power Station, Trent Side, Keadby, DN17 3EF	Approved – 14 September 2006
22.	WF/2003/1630	Electricity Act 1989 (Sections 36, 62(3) and schedule (8) Town & Country Planning Act 1990 (Section 90). Application by Renewable	Keadby Power Station, Trent Side, Keadby, DN17 3EF	Approved – 31 March 2005

NO.	REFERENCE NO.	DESCRIPTION	LOCATION	STATUS
		Energy System Limited for consent to construct and operate a 85 MW wind turbine generating station at Keadby in North Lincolnshire		
23.	PA/2001/1105	Planning permission to construct a contractors' laydown area and toilet block	Keadby Power Station, Trent Side, Keadby, DN17 3EF	Approved – 22 October 2001
24.	PA/1998/0737	Planning permission for construction of access road for proposed Keadby II Power Station.	Keadby Power Station, Trent Side, Keadby, DN17 3EF	Approved – 31 July 1998
25.	PA/1997/1407	Construct a 50m we auxiliary gas turbine and associated facilities relocation of car park and upgrading of existing gas turbines.	Keadby Power Station, Trent Side, Keadby, DN17 3EF	FORM B/CONDS Approved – 9 March 1999
26.	2/1992/0773	Temporary siting of portable buildings and storage units.	Keadby Power Station, Chapel Lane, Keadby	Approved – 4 November 1992
27.	2/1991/1075	Extension of existing sub station	Keadby 400Kv Substation, Chapel Lane, Keadby	Approved – 31 January 1992
28.	2/1991/0681	Erection of a detached bungalow.	76 Chapel Lane, Keadby	Approved – 21 October 1991
29.	Section 36 Consent – Keadby I	Construction and operation of a generating station	Keadby Power Station	Consent given – 4 March 1991 (Revised consent

NO.	REFERENCE NO.	DESCRIPTION	LOCATION	STATUS
		of about 720MW (later reduced to 680MW and re-consented)		given – 8 August 1991)
30.	2/1989/1223	Erection of an extension to switching station operational area	Keadby 400Kv Substation, Chapel Lane, Keadby	Approved – 21 December 1989
31.	2/1989/0942	Siting of a pre-fabricated mobile home	76 Chapel Lane, Keadby	Refused – 20 October 1989
32.	2/1989/0413	Construction of a vehicular access	Keadby Power Station, Chapel Lane, Keadby	Approved – 22 June 1989
33.	2/1989/0546	Erection of a 32 metre high radio mast	Keadby Power Station, Keadby	Approved – 12 June 1989
34.	2/1988/0179	Siting of a prefabricated mobile home	76 Chapel Lane, Keadby	Refused – 19 September 1988
35.	2/1988/0511	Demolition of existing dwelling, erection of a 2 bedroomed bungalow and installation of a septic tank	Red House, Chapel Lane, Keadby	Approved – 19 July 1988
36.	2/1986/0049	Demolition of existing house and erection of a bungalow.	76 Chapel Lane, Keadby	Approved – 08 May 1986
37.	2/1985/0186	Erection of warehousing and silos together with associated buildings and works.	Land to the south of Mariners Arms Flats, Station Road, Keadby	OLGRANT – 22 November 1985
38.	2/1984/0345	Erection of an 11000 volt overhead line.	Keadby Power Station, Keadby	Approved – 06 August 1984
39.	2/1981/0697	Erect light industrial buildings.	Mariners Arms, Trentside, Keadby	OLGRANT – 1 December 1981
40.	2/1980/0285	Erection of private dwelling houses.	Mariners Arms, Trentside, Keadby	O/L -REG 4 – 11 September 1980

NO.	REFERENCE NO.	DESCRIPTION	LOCATION	STATUS
41.	2/1976/0024	Use land for storage purposes.	Fronting, Trent Side, Keadby with Althorpe	Approved – 07 May 1976
42.	2/1974/0371	A layout of dwellings.	The Mariners Arms, Trentside, Keadby	OLGRANT – 18 October 1974
43.	2/1974/0201	Erect a bungalow	Land at rear of Glandburn, North End, Keadby, DN17 3EY	Refused – 18 July 1974
44.	N/A	Use of 104 acres (42 hectares) for the tipping of up to approximately 50,000m ³ pulverised ash, in association with a 360 MW coal fired generating station.	Keadby Common	Approved – January 1958

Appendix 2 : Legislative and Decision-Making Framework

2.1 Introduction

- 2.1.1 This appendix to the Planning Statement sets out the legislative and policy framework for the consideration of and determination of applications for Nationally Significant Infrastructure Projects ('NSIPs') such as the Proposed Development. The framework includes the National Policy Statements ('NPS') for energy infrastructure and other relevant legislative and policy matters that the Secretary of State ('SoS') may have regard to in determining applications for development consent.
- 2.1.2 Under the 2008 Act, the policy framework for examining and determining applications for a DCO is provided by the NPS. Section 5 of the 2008 Act allows the Secretary of State ('SoS') to designate NPS setting out national policy in relation to the types of NSIP listed at Section 14 of the 2008 Act.
- 2.1.3 The NPS are the primary policy used by the SoS to examine and determine applications for NSIP. Section 104 of the 2008 Act requires the SoS to determine applications for NSIP in accordance with the relevant NPS unless this would:
- lead to the UK being in breach of its international obligations;
 - be in breach of any statutory duty that applies to the SoS;
 - be unlawful;
 - result in the adverse impacts of the development outweighing the benefits; or
 - be contrary to regulations about how decisions are to be taken.
- 2.1.4 In January 2024, the Secretary of State for Energy Security and Net Zero designated the revised NPS relating to nationally significant energy infrastructure. The NPS that are of direct relevance to the Proposed Development are:
- EN-1; and
 - EN-2.
- 2.1.5 In addition, the National Policy Statement for natural gas supply infrastructure and gas and oil pipelines (EN-4) may be of relevance to the determination of the natural gas pipeline connection component, which has some characteristics of a NSIP pipeline but is under the threshold for a NSIP pipeline. Furthermore, the National Policy Statement for Electricity Networks Infrastructure ('EN-5') may be of relevance to the determination of the electricity connection to the existing

400kV National Grid Electricity Transmission (NGET) Substation, which has some characteristics of a NSIP electricity line but is also below the relevant threshold.

- 2.1.6 The Proposed Development potentially includes land within the marine area (the tidal River Trent). Accordingly, the appropriate marine policy documents are:
- the UK Marine Policy Statement (MPS) (HM Government, Northern Ireland Executive, Scottish Government, Welsh Assembly Government, 2011); and
 - the East Inshore and East Offshore Marine Plan (Department for Environment, Food and Rural Affairs, 2014).
- 2.1.7 In addition, when making decisions on NSIPs, the 2008 Act (Section 105) also states that the SoS must have regard to any local impact report submitted by a relevant local authority, any relevant matters prescribed in relation to the Proposed Development and any other matters that the SoS thinks are both ‘important and relevant’. Matters that may be important and relevant include UK Government energy policy and the local development plan.
- 2.1.8 The remainder of this appendix summarises these documents that collectively will provide the framework for the SoS’s decision.

National Planning Statements (NPS) and Marine Policy Statements (MPS)

Overarching National Policy Statement for Energy (EN-1)

- 2.1.9 Part 2 of EN-1 (DESNZ, 2024a) sets out ‘Government policy on energy and energy infrastructure development’. It confirms the following:
- the Government’s commitment to reducing GHG emissions by 78% by 2035 compared to 1990 levels (under Carbon Budget 6 for the period 2033-2037);
 - the need to effect a transition to a low carbon economy so as to reduce GHG emissions; and
 - the importance of maintaining secure and reliable energy supplies as older fossil fuel generating plant closes as a result of the European Union Emissions Trading System (‘EU ETS’) and the UK moves toward a low carbon economy.
- 2.1.10 Part 3 of EN-1 (DESNZ, 2024a) sets out the need for nationally significant energy infrastructure. Paragraph 3.1.1 states that the “government sees a need for significant amounts of new large-scale energy infrastructure to meet its energy objectives” and that the “government does not consider it appropriate for planning policy to set limits on different technologies but planning policy can be used to support the government’s ambitions in energy policy and other policy areas” (Paragraph 3.2.4). The Energy White Paper (EWP) also states that the Government “are not targeting a particular generation mix for 2050, nor would it be advisable to do so” (HM Government, 2020a).

- 2.1.11 Section 3.3 of EN-1 (DESNZ, 2024a) sets out why the Government believes that there is an urgent need for new nationally significant electricity infrastructure, and notes the following:
- meeting energy security and carbon reduction objectives – all types of energy infrastructure covered by the NPS are needed to achieve energy security in the UK at the same time as reducing GHG emissions;
 - The need to replace closing electricity generating capacity – at least 22 gigawatts (GW) of existing electricity generating capacity will need to be replaced in the coming years, as a result of ageing power stations and tightening environmental regulation. Additionally, 10GW of nuclear generating capacity is expected to close over the next 20 years (from 2011);
 - the need for more electricity capacity to support the increased supply from renewable sources – decarbonisation of electricity generation is reliant on a dramatic increase in the amount of renewable energy; however, many renewable sources (such as wind, solar and tidal) are intermittent and cannot be adjusted to meet demand. Furthermore, EN-1 recognises that there will still be a role for fossil fuel generation to provide a cost-effective means of ‘back up’ electricity generation at short notice to support renewable technologies; and
 - future increases in electricity demand – the demand for electricity is expected to increase and total electricity consumption could double by 2050. Depending upon the choice of how electricity is supplied, total capacity may need to more than double to be sufficiently robust to all weather conditions.
- 2.1.12 Paragraph 3.3.58 states that, given the time it takes for electricity NSIPs to move from design conception to operation, there is an urgent need for new (and particularly low carbon) electricity NSIPs to be brought forward as soon as possible, given the crucial role of electricity as the UK decarbonises its economy.
- 2.1.13 Paragraph 3.3.49 states that low carbon hydrogen could be capable of replicating the role of natural gas in the electricity system, including providing both firm, flexible capacity in the future and a decarbonisation route for unabated combustion power plants. The British Energy Security Strategy (Department for Business, Energy & Industrial Strategy, 2022) sets out the Government’s ambition for up to 10GW of low carbon hydrogen production capacity by 2030, subject to affordability and value for money, at least half of which is to come from electrolytic hydrogen, “working with industry to develop a strong and enduring UK hydrogen economy”.
- 2.1.14 Paragraph 3.4.12 of EN-1 states *“There is an urgent need for all types of low carbon hydrogen infrastructure to allow hydrogen to play its role in the transition to net zero”* and paragraph 3.4.13 states *“[...] the government is committed to developing low carbon hydrogen, which will be critical for meeting the UK’s legally binding commitment to achieve net zero by 2050, with the potential to help decarbonise vital UK industry sectors and provide flexible deployment across heat, power and transport.”*

- 2.1.15 Part 4 of EN-1 sets out a number of ‘assessment principles’ that must be taken into account by applicants and the Secretary of State in preparing and determining applications for nationally significant energy infrastructure. General points include (paragraphs 4.1.3 and 4.1.4) the requirement for the Secretary of State, given the level and urgency of need for the infrastructure covered by the energy NPS, to start with a presumption in favour of granting consent for applications for energy NSIPs. This presumption applies unless any more specific and relevant policies set out in the relevant NPS clearly indicate that consent should be refused or any of the considerations referred to in Section 104 of the 2008 Act apply.
- 2.1.16 Paragraph 4.1.5 goes on to state that in considering any proposed development, in particular when weighing its adverse impacts against its benefits, the Secretary of State should take into account:
- its potential benefits, including its contribution to meeting the need for energy infrastructure, job creation, a reduction of geographical disparities, environmental enhancements, and any long-term or wider benefits; and
 - its potential adverse impacts, including on the environment, and including any long-term and cumulative adverse impacts, as well as any measures to avoid, reduce or compensate for any adverse impacts, following the mitigation hierarchy.
- 2.1.17 Paragraph 4.1.6 continues by stating that within this context the Secretary of State should take into account environmental, social and economic benefits and adverse impacts, at national, regional and local levels.
- 2.1.18 Part 4.2 of EN-1 outlines the critical national priority (CNP) for low carbon infrastructure as a factor in decision making by the Secretary of State.
- 2.1.19 Paragraph 4.2.4 states that the Government has concluded that there is a CNP for the provision of nationally significant low carbon infrastructure, with paragraphs 4.2.2 and 4.2.5 highlighting the importance of hydrogen within this. The Proposed Development would be capable of operating on 100% hydrogen, 100% natural gas or a blend of the two. It therefore falls within the definition of ‘critical national priority’ infrastructure, as defined by EN-1 as it, if hydrogen-fired, it would comprise onshore electricity generation that does not involve fossil fuel combustion. In the scenario where it is natural gas-fired (or a blend of natural gas and hydrogen), it would comprise natural gas fired generation that is carbon capture ready, which also falls within the definition of ‘low carbon infrastructure’ and therefore is a critical national priority.
- 2.1.20 Other assessment principles include environmental effects/considerations; marine considerations; environmental and biodiversity net gain; criteria for ‘good design’; consideration of CHP; consideration of CCS; climate change adaptation and resilience; network connection, amongst others.
- 2.1.21 Part 5 of EN-1 (DESNZ, 2024a) lists a number of ‘generic impacts’ that relate to most types of energy infrastructure, which both applicants and the Secretary of State should take into account when preparing and considering applications.

These include air quality and emissions; GHG emissions; biodiversity and geological conservation; flood risk; and landscape and visual, amongst others.

2.1.22 Paragraphs 5.1.2 and 5.1.3 stress that the list of impacts is not exhaustive, and that applicants should identify the impacts of their projects in the Environmental Statement (ES) in terms of both those covered by the NPS and others that may be relevant. In relation to each of the generic impacts listed within Part 5 of EN-1, guidance is provided on how the applicant should assess these within their application and also the considerations that the Secretary of State should take into account in decision-making.

2.1.23 Section 5.3 of EN-1 also addresses Secretary of State decision making. Of particular relevance are paragraphs 5.3.9 - 5.3.12 which address operational greenhouse gas (GHG) emissions. EN-1 states that such emissions are a matter that should be managed on a whole economy and not an individual application basis:

‘Operational emissions will be addressed in a managed, economy-wide manner, to ensure consistency with carbon budgets, net zero and our international climate commitments. The Secretary of State does not, therefore need to assess individual applications for planning consent against operational carbon emissions and their contribution to carbon budgets, net zero and our international climate commitments.’

National Policy Statement for Fossil Fuel Electricity Generating Infrastructure (EN-2)

2.1.24 In addition to the assessment principles and generic impacts covered by EN-1, EN-2 sets out the factors (e.g. those influencing site selection) and ‘assessment and technology specific’ considerations including relevant environmental matters to be considered in the preparation and assessment of applications for natural gas-fired electricity generating infrastructure but also has relevance to hydrogen gas-fired electricity generating infrastructure.

2.1.25 EN-2 also states (at paragraph 1.1.2): “*The majority of new generating capacity will need to be low carbon. But new unabated natural gas generating capacity will also be needed during the transition to net zero. This will ensure that the system remains reliable and affordable*”.

2.1.26 Paragraph 1.6.3 states that hydrogen gas-fired electricity generating infrastructure over 50MW (in England) will require consent from the Secretary of State. It also states that although EN-2 has been drafted in respect of natural gas-fired electricity generating infrastructure it may also be “*important and relevant to hydrogen gas-fired electricity generating infrastructure.*”

National Policy Statement for Natural Gas Supply Infrastructure and Gas and Oil Pipelines (EN-4)

- 2.1.27 EN-4 is specifically intended to address natural gas infrastructure and does not have effect for hydrogen infrastructure, but may be relevant to the SoS's decisions on applications for such development, as paragraph 1.6.6 makes clear:
- 2.1.28 “The guidance that follows in this NPS has been drafted in respect of, and has effect only in relation to, natural gas infrastructure. It does not have effect for hydrogen infrastructure, but may be part of other matters which the Secretary of State thinks are important and relevant to their decision on applications for hydrogen infrastructure, in which case they would need to take it into account.”
- 2.1.29 Hydrogen is recognised in EN-4 as important to the clean energy transition (paragraph 1.1.4):

“Clean hydrogen, and the infrastructure that supports it, will be needed to help transition our energy system to net zero by 2050, with the potential to help decarbonise vital UK industry sectors and provide flexible deployment across heat, power and transport.”

Marine Policy Statement (MPS)

- 2.1.30 The MPS (HM Government, 2011) is the framework for preparing Marine Plans and taking decisions affecting the marine environment. It establishes a vision for the marine environment, which is for “*clean, healthy, safe, productive and biologically diverse oceans and seas*”. The MPS underpins the process of marine planning, which establishes a framework of economic, social, and environmental considerations that will deliver these high level objectives and ensure the sustainable development of the UK marine area.
- 2.1.31 High level marine objectives relevant to the Proposed Development include:
- Achieving a sustainable marine economy.
 - Infrastructure is in place to support and promote safe, profitable and efficient marine businesses.
 - Ensuring a strong, healthy and just society:
 - People appreciate the diversity of the marine environment, its seascapes, its natural and cultural heritage and its resources and act responsibly.
 - The use of the marine environment is benefiting society as a whole, contributing to resilient and cohesive communities that can adapt to coastal erosion and flood risk, as well as contributing to physical and mental wellbeing.
 - The coast, seas, oceans and their resources are safe to use.
 - The marine environment plays an important role in mitigating climate change.

- There is equitable access for those who want to use and enjoy the coast, seas and their wide range of resources and assets and recognition that for some island and peripheral communities the sea plays a significant role in their community.
- Living within environmental limits.
 - Biodiversity is protected, conserved and where appropriate recovered and loss has been halted.

2.1.32 Chapter 3 of the MPS sets out sectoral issues, such as defence and national security, ports and shipping, and marine aggregates. A recognised sector is energy production and infrastructure development (3.3). It is acknowledged that the UK offshore area is considered to be one of the most promising locations anywhere in the world to permanently store carbon dioxide (paragraph 3.3.31).

The East Inshore and East Offshore Marine Plans

2.1.33 The East Inshore and East Offshore Marine Plans (Department for Environment, Food and Rural Affairs, 2014) establishes the plan led system for the marine area in which the riverine parts of the Proposed Development Site are located.

2.1.34 In section 2, the vision and objectives for the East marine plan areas is stated. The vision (page 23) comprises:

“By 2034, sustainable, effective and efficient use of the East Inshore and East Offshore Marine Plan Areas has been achieved, leading to economic development while protecting and enhancing the marine and coastal environment, offering local communities new jobs, improved health and well-being. As a result of an integrated approach that respects other sectors and interests, the East marine plan areas are providing a significant contribution, particularly through offshore wind energy projects, to the energy generated in the United Kingdom and to targets on climate change.”

2.1.35 Section 3 comprises the plan policies. Key policies include:

- Policy EC1: “Proposals that provide economic productivity benefits which are additional to Gross Value Added currently generated by existing activities should be supported.”;
- Policy EC2: “Proposals that provide additional employment benefits should be supported, particularly where these benefits have the potential to meet employment needs in localities close to the marine plan areas.”;
- Policy SOC3, which in summary requires that proposals that affect the terrestrial or marine character of an area should, in order of preference, avoid, minimise or mitigate impacts. If the above is not possible the case should be made for proceeding with the proposal in spite of these impacts;

- Policy BIO1, which in summary requires appropriate weight to be attached to biodiversity, using an evidence based approach;
- Policy BIO2, which in summary requires that where appropriate, proposals for development should incorporate biodiversity and geological enhancement;
- Policy PS3, which in summary requires that proposals firstly avoid, or then mitigate, or then justify, interfering with current and future port and harbour expansion.

Other matters that are ‘important and relevant’

- 2.1.36 In making decisions on NSIPs, the 2008 Act (Section 105) also states that the SoS must have regard to any local impact report submitted by a relevant local authority, any relevant matters prescribed in relation to the Proposed Development and any other matters that the SoS thinks are both ‘important and relevant’.
- 2.1.37 In the case of the Proposed Development, other matters that are important and relevant may include draft NPSs. Three draft revised NPSs for energy infrastructure (EN-1, EN-3 and EN-5) were published by the Government for consultation in April 2025. As yet, no date has been set for the designation of the updated energy NPSs.
- 2.1.38 As well as draft NPSs, recent and relevant UK Government energy and climate change policy including national infrastructure plans and assessments are also “important and relevant”:
- National Infrastructure Plan (HM Treasury, 2014);
 - the Clean Growth Strategy (Department for Business, Energy & Industrial Strategy (BEIS), 2017);
 - The Climate Change Act 2008 (2050 Target Amendment) Order (2019);
 - The Future of Hydrogen – Seizing today’s opportunities (International Energy Agency, 2019);
 - Net Zero – Opportunities for the Power Sector (National Infrastructure Commission, 2020);
 - the Energy White Paper (EWP) DESNZ and BEIS, 2020);
 - UK Hydrogen Strategy (DESNZ, 2021);
 - Net Zero Strategy: Build Back Greener (DESNZ and BEIS, 2021);
 - Decarbonisation Readiness Consultation (DESNZ, 2023a);
 - Powering Up Britain (DESNZ, 2023b);
 - Hydrogen to Power Consultation on the Need, and Design, for a Hydrogen to Power Market Intervention (DESNZ, 2024); and

- Clean Power Action Plan 2030 (DESNZ, 2024).

2.1.39 All these documents set out important Government objectives for decarbonising the power and industrial sectors, in addition to the Government’s target (enshrined in law) of achieving Net Zero in terms of GHG emissions by 2050. They are summarised below.

National Infrastructure Plan

2.1.40 The National Infrastructure Plan (HM Treasury, 2014) (the ‘NIP 14’) sets out a vision for the UK’s infrastructure, reinforcing the Government’s commitment to investing in infrastructure and improving its quality and performance.

2.1.41 Paragraph 8.3 states that large-scale investment in gas and low-carbon electricity generation is vital in order to replace ageing energy infrastructure, maintain secure energy supplies and meet legally binding environmental targets. Around £100 billion of investment is estimated to be required in electricity generation and networks by 2020.

2.1.42 Paragraph 8.5 continues:

“As legacy coal, gas and nuclear power stations come offline, they will increasingly be replaced with a combination of renewable energy, new nuclear power and fossil fuel power stations fitted with Carbon Capture and Storage (CCS) technology. New gas plant is also needed as a vital backup for less flexible renewable generation and to ensure that the system can meet peak electricity demand. Demand for gas to supply heat to homes and businesses will also remain significant for some time to come.”

Clean Growth Strategy

2.1.43 The ‘Clean Growth Strategy – Leading the way to a low carbon future’ (Department for Business, Energy & Industrial Strategy, 2017) (‘the CGS’) sets out the aims of the Government to deliver increased economic growth while reducing carbon emissions.

2.1.44 The Executive Summary (page 9) confirms that for the UK to achieve its fourth and fifth carbon budgets (2023-27 and 2028-2032) it will be necessary to drive a significant acceleration in the pace of decarbonisation.

2.1.45 Pages 93 - 101 of Chapter 4 cover ‘Delivering Clean, Smart, Flexible Power’. The overriding objective is to deliver a reduction in emissions from the power sector. Page 96 states that in order to achieve this it will be necessary to continue to bring down the costs of low carbon generation from renewables.

2.1.46 Page 56 of Chapter 3 and page 151 cover the ‘hydrogen pathway’. This pathway sees a key role for low carbon hydrogen in decarbonising the grid. Existing gas infrastructure will be adapting to deliver hydrogen for heating, supporting hydrogen production using natural gas and capturing the emissions with CCUS. Because hydrogen is the main energy source for heating and

transport, electricity demand and therefore generation is lower than the other pathways at around 340 TWh (around the same level as today).

- 2.1.47 Page 82 states that there is a range of low carbon heating technologies with the potential to support the scale of change needed, including decarbonising the gas grid by substituting natural gas with low carbon gases, like hydrogen.

The Climate Change Act 2008 (2050 Target Amendment) Order

- 2.1.48 The Climate Change Act 2008 (2050 Target Amendment) Order 2019 enshrines in law the Government's commitment to achieve 'net zero' in terms of greenhouse gas emissions by 2050. This is in line with the recommendations of the Committee for Climate Change ('CCC').
- 2.1.49 The executive summary to the CCC report (The Committee on Climate Change, 2019) (page 12) states that the net zero target cannot be met simply by adding mass removal of carbon dioxide on to existing plans for the previous target of an 80% reduction by 2050 compared to 1990 levels. It highlights that CCUS is crucial to the delivery of zero greenhouse gas emissions and that it is of strategic importance to the economy. However, it raises concern that of the 43 large-scale CCUS projects operating worldwide, none are in the UK.
- 2.1.50 The report states that the remaining greenhouse gas emissions in the UK must be offset by removing CO₂ and permanently sequestering it through technologies such as CCUS. The report highlights the necessity of CCUS in terms of capturing the carbon dioxide from the production of hydrogen (given that a move to a hydrogen economy is critical to achieving net zero) and from non-renewable electricity production (page 23).

The Future of Hydrogen – Seizing today's opportunities

- 2.1.51 'The Future of Hydrogen' (International Energy Agency, June 2019) sets out the current status of hydrogen as an energy source; the ways in which hydrogen can help to achieve a clean, secure and affordable energy future; and how to realise its potential. The study, carried out in collaboration with governments, industry and academia, contains recommendations for immediate opportunities and for scaling up hydrogen.
- 2.1.52 The report identifies that hydrogen can enable renewables to make an even greater contribution and manage their variable output. The report states that the opportunity should be taken now to scale up technologies and bring down costs to allow hydrogen to become widely used. For hydrogen to make a significant contribution to the clean energy transition, it needs to be adopted in sectors in which it is currently absent, including transport and power generation.
- 2.1.53 Seven key recommendations are set out:
- establish a role for hydrogen in long-term energy strategies (including in the power generation sector);
 - stimulate commercial demand for clean hydrogen;

- address investment risks of first-movers;
- support research and development to bring down costs;
- eliminate unnecessary regulatory barriers and harmonise standards;
- engage internationally and track progress; and
- focus on four key opportunities to further increase momentum over the next decade: turn existing industrial ports into hubs for lower carbon hydrogen, use existing gas infrastructure to spur new clean hydrogen supplies, support transport fleets, freight and corridors using fuel cell vehicles, and establish shipping routes for international hydrogen trading.

Net Zero – Opportunities for the Power Sector

2.1.54 'Net Zero - Opportunities for the Power Sector' (National Infrastructure Commission, 2020) states that decarbonising the power sector is integral to achieving the goal of net zero by 2050.

2.1.55 The National Infrastructure Commission (NIC) (since replaced by the National Infrastructure and Service Transformation Authority (NISTA)) provides impartial advice to the government on infrastructure needs and solutions. Its terms of reference are set by government, and while NIC recommendations do not constitute government policy, the government is required to formally respond to the recommendations, and they may form the evidence base for future policy.

2.1.56 Core to the NIC recommendations (page 7) is that:

“a highly renewable power system, combined with flexible technologies including hydrogen powered generation, could be substantially cheaper than alternatives that rely heavily on a fleet of nuclear power plants.”

“Highly renewable systems are still a low cost option in a net zero world. The analysis once again finds that electricity system costs are broadly flat across a range of different levels of renewable penetrations. If hydrogen is deployed, providing low carbon and flexible generation, it could further reduce the costs of highly renewable systems, by up to 30 per cent in some scenarios modelled here.”

2.1.57 This is further supported on page 14:

“Hydrogen, a zero carbon energy carrier, could be used to decarbonise areas of transport, heating, industry and potentially aviation and shipping. The CCC have stated that “By 2050, a new low carbon industry is needed with UK hydrogen production capacity of comparable size to the UK’s current fleet of gas-fired power stations.””

2.1.58 The NIC has identified that increasing the proportion of renewables on the system does not materially impact the cost of the system and that “future system costs may even be lower if action is taken to test the feasibility of

deploying hydrogen turbines, an emerging technology for the power sector” (page 5). This is because hydrogen turbines displace many other non-renewable forms of generation and flexibility, reducing the necessary installed capacity of these technologies, and hence system costs.

- 2.1.59 Page 18 of the NIC recommendations acknowledges that there will be a mix of technologies in net zero power systems, including unabated thermal (with low running hours) and at least 18 gigawatts (GW) of gas CCS capacity by 2050, generating 23 terawatt hours (TWh) of electricity. By 2050 it is expected that this will primarily play a peaking role in the electricity system.

Energy White Paper 2020

- 2.1.60 The Energy White Paper 2020 (DESNZ and Department for Business, Energy & Industrial Strategy, 2020) builds on the Ten Point Plan (HM Government, 2020) and the National Infrastructure Strategy (HM Treasury, 2020), providing further clarity on the Prime Minister’s measures and puts in place a strategy for the wider energy system that transforms energy, supports a green recovery, and creates a fair deal for consumers.
- 2.1.61 Page 12 states that the UK is aiming for 5GW of low-carbon hydrogen production capacity by 2030.
- 2.1.62 Page 112 recognises that clean hydrogen could potentially provide a way to decarbonise our gas supplies on a much larger scale than reliance on biomethane alone.

Net Zero Strategy 2021

- 2.1.63 The Net Zero Strategy: Build Back Greener (2021) (DESNZ and Department for Business, Energy & Industrial Strategy, 2021) sets out clear policies and proposals for keeping the UK on track for its coming carbon budgets, the Government’s ambitious Nationally Determined Contribution (NDC), and then sets out the vision for a decarbonised economy in 2050.
- 2.1.64 Many sectors require low carbon energy, including those where electrification is not a viable option, making the supply of cleaner fuels essential to achieving net zero. Building on commitments in the North Sea Transition Deal, the Government aims to significantly reduce emissions from traditional oil and gas fuel supplies, whilst scaling-up the production of low carbon alternatives such as hydrogen and biofuels
- 2.1.65 The Government is actively taking steps to bring forward low carbon technologies capable of replicating the role of unabated gas in the electricity system, including CCUS-enabled generation, hydrogen-fired generation, BECCS, and flexible storage.

- 2.1.66 Page 109 supports the development of innovative low carbon hydrogen solutions, supported by the UK Hydrogen Strategy, which further sets out the Government's comprehensive approach to growing a UK hydrogen economy. This indicates that use of low carbon hydrogen enabled by 5 GW of production capacity could deliver total emissions savings of 41 MtCO₂ e between 2023 and 2032, the equivalent of the carbon captured by 700 million trees over the same period.
- 2.1.67 Page 111 states that decarbonising fuel supply and growth of the hydrogen sector will regenerate communities and open up new employment opportunities right around the UK. Based on current estimates, policies and proposals to reduce emissions in fuel supply and growing the hydrogen sector could support up to 10,000 jobs in 2030.

UK Hydrogen Strategy 2021

- 2.1.68 The UK Hydrogen Strategy (DESNZ, 2021) sets out how the target of 5GW of low-carbon hydrogen production capacity will be achieved by 2030 and how hydrogen will be positioned to help meet the UK's Sixth Carbon Budget and net zero commitments.
- 2.1.69 The Executive Summary states that hydrogen is one of a handful of new, low carbon solutions that will be critical for the UK's transition to net zero. As part of a deeply decarbonised, deeply renewable energy system, low carbon hydrogen could be a versatile replacement for high-carbon fuels used today – helping to bring down emissions in vital UK industrial sectors and providing flexible energy for power, heat and transport.
- 2.1.70 It further states that there is almost no low carbon production of hydrogen in the UK or globally today.
- 2.1.71 Page 7 states that low carbon hydrogen will be critical for meeting the UK's legally binding commitment to achieve net zero by 2050, and Carbon Budget Six in the mid-2030s on the way to this. Hydrogen can support the deep decarbonisation of the UK economy, particularly in 'hard to electrify' UK industrial sectors, and can provide greener, flexible energy across power, heat and transport. Moreover, the UK's geography, geology, infrastructure and expertise make it particularly suited to rapidly developing a low carbon hydrogen economy, with the potential to become a global leader on hydrogen and secure economic opportunities across the UK.
- 2.1.72 Page 8 states that most hydrogen produced and used in the UK and globally is high carbon, coming from fossil fuels with no carbon capture; only a small fraction can be called low carbon, emphasising the need for low carbon hydrogen electricity generating stations.

Net Zero Strategy: Build Back Greener (2021)

- 2.1.73 The 'Net Zero Strategy: Build Back Greener' (DESNZ and Department for Business, Energy & Industrial Strategy, 2021) expands on key commitments in the Ten Point Plan, the EWP and sets out the next steps the Government proposes to take to cut emissions, seize green economic opportunities and leverage further private investment in net zero. The strategy sets an indicative delivery pathway for emission reductions to 2037 by sector. It is intended to put the UK on the path for Carbon Budget 6 and ultimately on course for net zero by 2050.
- 2.1.74 Regarding power, page 19 of the strategy states that the UK will fully decarbonise its power system by 2035 subject to security of supply. It states that the power system will consist of abundant, cheap renewables, cutting edge new nuclear power stations, underpinned by flexibility including storage, gas with CCUS and hydrogen.

Decarbonisation Readiness Consultation 2023

- 2.1.75 The Decarbonisation Readiness Consultation 2023 (DESNZ, 2023a) provides an update to the 2009 Carbon Capture Readiness (CCR) requirements to ensure all new build combustion power plants have a viable route to decarbonisation; make the requirements more flexible and simpler; provide a clear decarbonisation pathway for combustion power plants and keep pace with the evolving nature of decarbonisation technologies, in particular low carbon hydrogen.
- 2.1.76 The Executive Summary states that the Government sees low carbon hydrogen as a critical component of our broader strategy to deliver energy security, create economic growth and contribute to our net zero target.
- 2.1.77 It goes on to confirm that hydrogen will enable us to use our domestic energy assets, including gas and renewables, to decarbonise UK industrial sectors, power, heavy transport, and potentially home heating.
- 2.1.78 It proposes to enable combustion power plants to demonstrate decarbonisation readiness through conversion to hydrogen firing.
- 2.1.79 Page 20 states that hydrogen to power has the potential to be vital in achieving our decarbonisation targets by providing a large source of firm and flexible low carbon generation that is capable of fast ramping, as we integrate more intermittent renewables.
- 2.1.80 Section 2.2.1 states that Government analysis shows that having hydrogen available in the power sector could achieve lower emissions at a lower cost than scenarios without hydrogen.
- 2.1.81 The Consultation acknowledges (at Section 7.7) that the technology for 100% hydrogen fired generating stations may not be available on the market until at least 2030. It also acknowledges that new generating plants capable of firing a blend of natural gas and hydrogen would create the market signals necessary

to encourage the development of generation equipment capable of 100% hydrogen firing.

2.1.82 In October 2024 the new Government published its response to the Consultation. This reaffirmed the new Government's commitment to decarbonisation of the UK's energy supply:

'Making Britain a Clean Energy Superpower is one of the Prime Minister's five defining missions. There are two parts to this mission: delivering clean power by 2030 and accelerating delivery of net zero. Whilst we move forward at pace to deliver this mission, electricity demand is expected to increase, driven by heating and transport electrification. To meet this demand, renewables must be complemented by generation sources which can deliver power irrespective of calm or dull weather conditions. This includes flexible supply sources that can scale up or down instantaneously to meet peak demand and which, in contrast to short-duration flexibility such as batteries, can run for extended periods of low renewable production.'

2.1.83 Specifically related to hydrogen-fired generating stations, the Consultation Response confirmed that the Government will introduce the ability for operators to choose which decarbonisation pathway (carbon capture readiness or hydrogen conversion readiness) best suits the plant. A Hydrogen Conversion Readiness (HCR) assessment will be introduced, covering the following matters:

- A hydrogen space assessment, to test whether sufficient space has been set aside to facilitate future conversion to hydrogen firing;
- A technical feasibility test, to show whether proposals are configured to allow straightforward conversion to hydrogen firing;
- A hydrogen fuel access test, to show whether it will be possible during the lifetime of the plant, to ensure access to a sufficient supply of hydrogen;
- A hydrogen economic feasibility test, to assess whether there are reasonable grounds to believe that it will be economically feasible to convert a combustion generating station to hydrogen and whether hydrogen would be the primary fuel.

[Powering Up Britain \(March 2023\)](#)

2.1.84 On 30 March 2023 the Government published three documents comprising Powering Up Britain (DESNZ, 2023b), the 'Energy Security Plan' and 'Net Zero Growth Plan' following the judicial review of the Net Zero Strategy. All three documents provide details of the Government's measures to increase domestic energy production, resilience in the energy supply and achieve net zero.

Clean Power 2030 Action Plan: A new era of clean electricity

- 2.1.85 On 13 December 2024 the Government published the Clean Power Action plan (DESNZ, 2024) to meet its clean power target with clean sources producing at least as much power as Great Britain consumes in total over a typical weather year and at least 95% of Great Britain's generation with a maximum of 5% from unabated gas. The Clean Power Action Plan recognises that a clean power system will include and require low carbon dispatchable power such as gas with CCUS or hydrogen to power (H2P) and other innovative technologies, to reduce unabated gas generation and stabilise capacity.
- 2.1.86 In relation to Hydrogen, the Clean Power Action Plan states that H2P can play a key role in our electricity system at a range of scales and is the primary low carbon technology capable of providing low carbon inter-seasonal storage, whilst providing a decarbonisation pathway for unabated gas. It also states that ensuring the deployment of hydrogen transport and storage infrastructure, alongside supporting H2P plants, will be critical in enabling delivery of H2P whilst also providing the infrastructure to support industrial decarbonisation through hydrogen.
- 2.1.87 National and Local Planning Policy National and local planning policy, in the form of the National Planning Policy Framework (NPPF) and the development plan (comprising the Core Strategy (2011), the saved policies of the Local Plan 2003) are also important and relevant to the Proposed Development. These are addressed at section 3 and Appendices 6 and 7 of the Planning Statement.

Clean Flexibility Roadmap

- 2.1.88 The Clean Flexibility Roadmap, published in July 2025, identifies the need for short duration and long duration flexibility in the UK's power supply. It defines 'clean flexibility' as follows:
- 2.1.89 'Clean flexibility is the ability to shift in time or location the demand or supply of electricity, over hours, days or seasons, while reducing emissions. It includes storing clean energy for times when demand outstrips supply, offering rewards to consumers who choose to shift demand away from peak times, importing and exporting electricity, and generating low carbon dispatchable power.'
- 2.1.90 Within this is the need for short and long duration flexibility. Short duration flexibility encompasses technologies that can respond to changes in supply and demand over minutes to several hours. Long duration flexibility technologies respond to needs over a daily, weekly or seasonal period, most notably by continuing to supply reliable, secure, low carbon electricity when output from renewable sources is low, for example when winds are low and output from windfarms drops. Hydrogen to Power ('H2P') is identified as a key provider of low carbon inter-seasonal dispatchable energy.
- 2.1.91 One of the main objectives, and a key benefit of the Proposed Development, is to demonstrate hydrogen-enabled, flexible, dispatchable generation at a commercial scale in the UK. The Proposed Development would therefore help underpin the security of UK electricity supplies while supporting the transition to

a low carbon economy and the achievement of the Government's Net Zero by 2050 target. As such, it accords with a key policy objective of EN-1 (and the EWP), to deliver new low carbon electricity generating capacity.

- 2.1.92 The Proposed Development would support the delivery of NPS policy more generally. Each technical chapter of the ES (Chapters 8-20 (ES Volume I – **Application Document Ref. 6.2**)) explains the policies in the NPS that have informed, and are informing, the design, assessment, and controls applicable to the Proposed Development.
- 2.1.93 EN-2 does not prescribe locations for this type of energy NSIP but establishes criteria by which developers should identify suitable sites. Both **Section 2: Planning History and Local Planning Designations** of this Planning Statement, and **Chapter 3: The Site and Surrounding Area** (ES Volume I – **Application Document Ref. 6.2.3**) explains the suitability of the chosen site for the Proposed Development and therefore the need for this general type of development corresponds to a need for the Proposed Development.
- 2.1.94 The Proposed Development is consistent with and supportive of the economic, employment, energy, and climate change policies of the UK MPS. **Section 6** of this Planning Statement sets out how the Proposed Development has avoided and minimised impacts on marine character and provided opportunities for biodiversity enhancement as sought by other UK MPS policies.

National Planning Policy

- 2.1.95 Paragraph 5 of the NPPF explains the relationship between that document and the decision-making framework under the PA2008:

'The Framework does not contain specific policies for nationally significant infrastructure projects. These are determined in accordance with the decision-making framework in the Planning Act 2008 (as amended) and relevant national policy statements for major infrastructure, as well as any other matters that are relevant (which may include the National Planning Policy Framework). National policy statements form part of the overall framework of national planning policy, and may be a material consideration in preparing plans and making decisions on planning applications.'

- 2.1.96 Thus, the NPPF may be considered to be a matter that is relevant for the purposes of assessing DCO applications. The ES and other studies and designs undertaken for the Proposed Development have therefore had regard to the relevant policies of the NPPF as part of the overall framework of national policy.

Local Planning Policy

- 2.1.97 The Site is located within the administrative boundary of NLC which represents the ‘host local authority’ for the Proposed Development for the purposes of **Section 42** of the PA 2008. The development plan documents produced by NLC therefore represent the statutory development plan for the Proposed Development.
- 2.1.98 The local development plan for the Proposed Development therefore comprises the following DPDs:
- North Lincolnshire Local Development Framework Core Strategy (the ‘Core Strategy’) (NLC, 2011) - adopted June 2011;
 - North Lincolnshire Local Development Framework Housing and Employment Land Allocations DPD (the ‘Allocations DPD’) (NLC, 2016) - adopted March 2016; and
 - Saved Policies of the North Lincolnshire Local Plan (the Local Plan) (Local Development Frameworks Government Office for Yorkshire and The Humber, 2007) - adopted May 2003, saved September 2007.
- 2.1.99 An overview of the above DPDs, in so far as they contain planning allocations/ designations (and related policies) of relevance to the Proposed Development is provided below. The Proposed Development is assessed against these policies at Section 4.

Core Strategy

- 2.1.100 The North Lincolnshire Local Development Framework Core Strategy does not contain any allocations or designations relevant to the Proposed Development or its Site, however, it does denote Keadby Wharf as one of the area’s ‘Ports and Wharves’ and policies CS1, CS11, CS12 and CS6 are of relevance.

Housing and Employment Land Allocations DPD

- 2.1.101 Keadby Wharf is allocated as a ‘Wharf Location’ and Keadby Lock as an ‘Ancient Monument’ in the North Lincolnshire Local Development Framework Housing and Employment Land Allocations DPD, meaning policies IN10 and HE8 are of relevance, respectively. The Site is located largely outside of settlement boundaries although parts of the proposed connection routes lie within the settlement limit of Keadby.

Local Plan

- 2.1.102 The Inset and Proposals Maps related to the North Lincolnshire Local Plan were superseded by the Housing and Employment Land Allocations DPD explained above.

Appendix 3 : Compliance with Marine Policy Statements

Policy Document	Policy	Policy Text	Assessment
UK Marine Policy Statement	Paragraph 3.3.4	<p>“When decision makers are examining and determining applications for energy infrastructure and marine plan authorities are developing Marine Plans they should take into account:</p> <ul style="list-style-type: none"> • The national level of need for energy infrastructure, as set out in the Overarching National Policy Statement for Energy (EN-1) which applies in England and Wales, the National Planning Framework which applies in Scotland and the Strategic Energy Framework in Northern Ireland; [...] • The positive wider environmental, societal and economic benefits of low carbon electricity generation and carbon capture and storage as key technologies for reducing carbon dioxide emissions [...].” 	<p>Need As set out above in Section 3 of this report, paragraph 3.3.58 of EN-1 states that there is an urgent need for new (and particularly low carbon) electricity NSIPs to be brought forward as soon as possible, given the crucial role of electricity as the UK decarbonises its economy. Paragraphs 3.3.60 and 3.3.61 go on to state that the need for Low Carbon Hydrogen is established by the NPS and a combination of many generation technologies or all of them is urgently required for both energy security and Net Zero.</p> <p>Wider environmental, societal and economic benefits Wider environmental and societal benefits arise from supporting the Government’s strategy for achieving net zero by 2050, specifically by stimulating a hydrogen economy (see section 5.2 of this Planning Statement (Application Document Ref. 5.5)).</p>

			<p>Regarding economic benefits, Chapter 16 ‘Socio-Economics’ of the ES Volume I (Application Document Ref. 6.2.16) addresses the potential effects of the construction, operation (including maintenance) and decommissioning of the Proposed Development on employment, local businesses and the local population.</p> <p>Based on the gross construction worker requirements for construction of the Proposed Development and the additionality factors outlined in Chapter 16, 663 net construction jobs would be generated. It is estimated that the total net employment for the Proposed Development during operation is up to 58 employees.</p>
East Inshore and East Offshore Marine Plans	EC1	“Proposals that provide economic productivity benefits which are additional to Gross Value Added currently generated by existing activities should be supported.”	<p>Chapter 16 ‘Socio-Economics’ of the ES Volume I (Application Document Ref. 6.2.16) addresses the potential effects of the construction, operation (including maintenance) and decommissioning of the Proposed Development on employment, local businesses and the local population.</p> <p>The Proposed Development would provide economic productivity benefits which are additional to Gross Added Value currently</p>

			generated by existing activities both through the production of clean energy and the through employment, as set out below.
East Inshore and East Offshore Marine Plans	EC2	“Proposals that provide additional employment benefits should be supported, particularly where these benefits have the potential to meet employment needs in localities close to the marine plan areas.”	Chapter 16 sets out how based on the gross construction worker requirements for construction of the Proposed Development and the additionality factors outlined in Chapter 16, 663 net construction jobs would be generated. It is estimated that the total net employment for the Proposed Development during operation is up to 58 employees.
East Inshore and East Offshore Marine Plans	SOC3	<p>“Proposals that may affect the terrestrial and marine character of an area should demonstrate, in order of preference:</p> <ul style="list-style-type: none"> a) that they will not adversely impact the terrestrial and marine character of an area b) how, if there are adverse impacts on the terrestrial and marine character of an area, they will minimise them c) how, where these adverse impacts on the terrestrial and marine character of an area cannot be minimised they will be mitigated against d) the case for proceeding with the proposal if it is not possible to minimise or mitigate the adverse impacts” 	<p>Chapter 14 ‘Landscape and Visual Amenity’ of the ES Volume I (Application Document Ref. 6.2.14) addresses the potential effects of the construction, opening, operation (including maintenance) and decommissioning of the Proposed Development on landscape character (as a resource in its own right) and visual amenity.</p> <p>Views of the Proposed Development other than those assessed are acknowledged to exist. The viewpoints are not intended to provide an exhaustive or fully comprehensive catalogue of views of the Site, rather they are those considered by the applicant and consultees to be the views most likely to be impacted.</p> <p>The assessment has determined that the Proposed Development is likely to result in a</p>

			<p>significant adverse effect on visual amenity from viewpoints 1 (Chapel Lane West, Keadby), 2 (Gate Keepers Residence, Keadby) and 4 (PRoW (KEAD9, KEAD10) north of Keadby). No impact on the marine environment is anticipated.</p> <p>Since it is considered that mitigation measures would not be effective in reducing this visibility, none are proposed. As such, the significant adverse effects will remain. However, the benefits of the Proposed Development are considered to outweigh the impacts on Viewpoints 1, 2 and 4 (see section 5.4 of this Planning Statement (Application Document Ref. 5.5)).</p>
East Inshore and East Offshore Marine Plans	BIO1	“Appropriate weight should be attached to biodiversity, reflecting the need to protect biodiversity as a whole, taking account of the best available evidence including on habitats and species that are protected or of conservation concern in the East marine plans and adjacent areas (marine, terrestrial).”	Chapter 11 ‘Biodiversity, Ecology and Nature Conservation’ of the ES Volume I (Application Document Ref. 6.2.11) finds that the Proposed Development has been sensitively designed and positioned to ensure no significant adverse residual construction, operation or decommissioning effects. Further information can also be found in Appendix 11E: Riparian Mammal Survey Report and Appendix 11F: Aquatic Ecology Survey Report(Application Document Ref. 6.3).
East Inshore and East	BIO2	“Where appropriate, proposals for development should incorporate features	The ecological impact assessment (ES Volume I Chapter 11: Biodiversity and Nature Conservation (Application Document

<p>Offshore Marine Plans</p>		<p>that enhance biodiversity and geological interests.”</p>	<p>Ref. 6.2)) identifies that the careful siting of the Proposed Development to avoid sensitive habitats has minimised potential for sensitive habitats and species to be adversely affected. However, the assessment still identifies a need for proportionate embedded ecological mitigation for purposes of good practice and legislative compliance. Habitat re-instatement and enhancement is also required in order to demonstrate no net loss and a net gain of biodiversity in accordance with the requirements of national and local planning policy. Currently there is no legal requirement to deliver biodiversity net gain for nationally significant infrastructure projects (NSIPs), and the Government has indicated that this will not be a statutory requirement for DCO applications before May 2026. Nevertheless, Appendix D of the Outline Landscape and Biodiversity Management and Enhancement Plan Report (Application Document Reference: 5.10) concludes that the planning policy requirement for BNG can be met, with the gains estimated as follows:</p> <ul style="list-style-type: none"> • increase of 11.90 habitat units (+10.08%); • increase of 3.49 hedgerow units (+30.16%); and • increase of 2.68 watercourse units (+10.04%).
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<p>East Inshore and East Offshore Marine Plans</p>	<p>CC1</p>	<p>“Proposals should take account of:</p> <p style="padding-left: 40px;">how they may be impacted upon by, and respond to, climate change over their lifetime and</p> <p style="padding-left: 40px;">how they may impact upon any climate change adaptation measures elsewhere during their lifetime</p> <p>Where detrimental impacts on climate change adaptation measures are identified, evidence should be provided as to how the proposal will reduce such impacts.”</p>	<p>ES Volume I Chapter 18 (Climate Change) (Application Document Ref. 6.2.18) provides information and considers the potential vulnerability of the Proposed Development to climate change and the potential effects of flooding in relation to the Proposed Development, including rising sea levels and tidal surge. The Chapter is supported by the Climate Change Risk Assessment at ES Volume II Appendix 18A (Application Document Ref. 6.3.25) and the In-combination Climate Change Impact Assessment at ES Volume II Appendix 18B (Application Document Ref. 6.3.26). Impacts relating to flood risk can be found in ES Volume I Chapter 12 (Water Environment and Flood Risk) (Application Document Ref. 6.2.12), and ES Volume II Appendix 12A: Flood Risk Assessment and Appendix 12B: Water Framework Directive Assessment (Application Document Ref. 6.3).</p> <p>The draft DCO includes Requirements relating to ‘Surface Water drainage’, ‘Foul water drainage’ and ‘Flood risk mitigation’ that require the submission of details for approval prior to the commencement of works on the relevant part of the Proposed Development</p>

			<p>relating to surface, foul water drainage and flood risk mitigation respectively.</p> <p>It is therefore considered that the Proposed Development would mitigate the effects of climate change, while its design would ensure that it is resilient to the future potential effects of climate change.</p>
East Inshore and East Offshore Marine Plans	CC2	<p>“Proposals for development should minimise emissions of greenhouse gases as far as is appropriate. Mitigation measures will also be encouraged where emissions remain following minimising steps. Consideration [FN 131] should also be given to emissions from other activities or users affected by the proposal [FN 132]).”</p> <p>FN 131 - In responding to this policy, it may be useful to refer to processes set out in related guidance such that issued by Department for Energy And Climate Change including “Guidance on carbon neutrality” (2009), which describes matters such as how to define the scope of emissions).</p>	<p>ES Chapter 8 (Air Quality) of ES Volume I (Application Document Ref. 6.2.8) addresses the potential air quality effects of the Proposed Development. Chapter 8 identified no significant residual effects relating to air quality, and ES Volume I Chapter 21 (Cumulative Assessment) identified no significant residual cumulative or combined effects.</p> <p>ES Volume I Chapter 18 (Climate Change and Sustainability) (Application Document Ref. 6.2.18) provides information and considers the potential vulnerability of the Proposed Development to climate change and the potential effects of flooding in relation to the Proposed Development, including rising sea levels and tidal surge. The Chapter is supported by the Climate Change Risk Assessment at ES Volume II Appendix 18A (Application Document Ref. 6.3.25). These assessments conclude that, subject to implementation of recommended adaptation</p>

		FN 132- For example, through displacement.	measures, there would be no significant risks associated with the 34 risks identified, including the overarching climate risks of flooding, changing temperatures and storm events.
East Inshore and East Offshore Marine Plans	PS3	<p>“Proposals should demonstrate, in order of preference:</p> <ul style="list-style-type: none"> a) that they will not interfere with current activity and future opportunity for expansion of ports and harbours [FN 209] b) how, if the proposal may interfere with current activity and future opportunities for expansion, they will minimise this c) how, if the interference cannot be minimised, it will be mitigated d) the case for proceeding if it is not possible to minimise or mitigate the interference” <p>FN 209 - In identifying current activity and future opportunity for port or harbour expansion, it is important that applicants demonstrate that ports and harbours’ reasoned representations be accounted for in proposals.</p>	<p>A Navigational Risk Assessment (‘NRA’) (Appendix 12C (ES Volume II - Application Document Ref. 6.3)) has been prepared to accompany the application for the Proposed Development and describes the navigation baseline for the River Trent and measures to mitigate against navigational risks associated with usage of the canal for water abstraction. With the application of mitigation, it is considered that all risks can be managed to a level which is As Low as is Reasonably Practical (ALARP).</p> <p>A ‘Worst Credible Scenarios’ approach has been used within the NRA to understand the location and nature of any navigational risks; a variety of marine users have been considered ranging from small unpowered “vessels” and recreational craft to very large commercial vessels known to use the port approaches.</p> <p>In all instances, the identified risks are ‘low’ or in the case of AIL movements at the Waterborne Transport Offloading Area, ‘medium’. With the application of the</p>

			<p>proposed mitigation, it is considered that all risks can be reduced to 'low' and can be suitably managed by risk control protocols to reduce them to an acceptable level. The primary risk reduction measures proposed in the NRA are:</p> <ul style="list-style-type: none"> • engagement and collaboration with CRT to ensure that local working knowledge is used to inform the timing and delivery of works; • appropriate hazard warning, screening, lighting and signage will be installed, as required; • engagement with ABP Humber, PD Ports and, where required due to planned closures of Keadby Lock, CRT, would be undertaken to help inform the planned use of Railway Wharf; • the final CEMP would provide relevant stakeholders with the opportunity to review the measures proposed for the effective management of construction risks, including provision of a method statement; • notices to Mariners will be prepared and requested for issue by the appropriate Navigational Authority in
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			<p>order to ensure that mariners are aware of the planned activities;</p> <ul style="list-style-type: none"> • it is anticipated that some AIL deliveries may require the temporary closure of Keadby Lock. This will minimise risks to mariners using the Stainforth and Keadby Canal; and • building upon lessons-learned from Keadby 2 Power Station, a shipping movement schedule will be maintained by the Applicant, in collaboration with the heavy lift contractor, once appointed providing information on the timing and nature of loads arriving. <p>Further detail of the Navigational Risk Assessment is provided in the NRA. In EIA terms, the overall magnitude of impact is considered minor for the River Trent and the Stainforth and Keadby Canal. Both are high importance receptors for navigation, resulting in a slight adverse effect (not significant) in relation to navigational risk at both watercourses.</p>
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Appendix 4 : Generic Impacts Assessment

GENERIC IMPACT	SUMMARY	ASSESSMENT
<p>Air quality and emissions (EN-1, 5.2 and EN-2, 2.5)</p>	<p>EN-1 acknowledges that air quality and emissions are likely to be a key area of concern when assess the development of generating stations. Paragraph 5.2.5 of the NPS EN-1 states:</p> <p><i>“[...] Emissions from combustion plants are generally released through exhaust stacks. Design of exhaust stacks, particularly height, is the primary driver for the delivery of optimal dispersion of emissions and is often determined by statutory requirements.”</i></p> <p>Paragraphs 5.2.8 and 5.2.9 of EN-1 set out the requirements for applicants to assess issues relating to air quality and emissions as part of an ES.</p> <p>EN-1 states that the ES should describe:</p> <ul style="list-style-type: none"> • “existing air quality concentrations and the relative change in air quality from existing levels; • any significant air quality effects, mitigation action taken and any residual effects, distinguishing between the project stages and taking account of any significant emissions from any road traffic generated by the project; ;the predicted absolute emissions, 	<p>ES Chapter 8 (Air Quality) of ES Volume I (Application Document Ref. 6.2.8) addresses the potential air quality effects of the Proposed Development.</p> <p>The air quality assessment of construction impacts assumes that the measures outlined within Section 7 of Chapter 8 would be incorporated into the design of the Proposed Development, as they are standard best practice measures that are routinely applied across UK construction sites. These are secured in the Framework CEMP, a requirement in Schedule 2 of the Draft DCO (Application Document Ref. 2.1) secures the submission and approval of the final CEMP, which must be in accordance with the Framework CEMP. No additional mitigation has been identified as necessary for the construction phase of the Proposed Development. For this reason, the residual effects are identified to be not significant.</p> <p>Consistent with construction mitigation, it has been assumed that relevant best practice mitigation measures would be in place during any decommissioning works. No additional mitigation has been identified as necessary for the decommissioning phase of the Proposed Development.</p>

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GENERIC IMPACT	SUMMARY	ASSESSMENT
	<p>concentration change and absolute concentrations as a result of the proposed project, after mitigation methods have been applied; and</p> <ul style="list-style-type: none"> any potential eutrophication impacts.” <p>Paragraph 5.2.16 states that air quality considerations will be given substantial weight where a Proposed Development would lead to deterioration in air quality in an area including where an area breaches any national air quality limits or statutory air quality objectives. Air quality considerations will also be important where substantial changes in air quality levels are expected, even if this does not lead to any breaches of national air quality limits, objectives or targets.</p> <p>Paragraph 5.2.19 requires decisions to take account of any relevant statutory air quality limits, objectives and targets. Paragraph 5.2.12 states that where the limits, objectives and targets would likely be breached (or where affect the ability of a non-compliant area to achieve compliance), developers should work with the relevant authorities to secure appropriate mitigation measures to ensure those statutory limits, objectives or targets are not breached.</p>	<p>The air quality assessment of impacts at opening has assumed that the Emission Limit Value (ELV) will be met for the operational plant as required and in accordance with use of BAT under the environmental permitting regime.</p> <p>There is a single AQMA designated within the administrative boundary of NLC. The AQMA is approximately 6.3km from the Proposed Development and covers an area surrounding the steelworks to the east of Scunthorpe and was designated due to the exceedance of the PM10 24 hour mean National Air Quality Objective. It is not considered that the Proposed Development will impact upon the air quality within the AQMA as the AQMA has not been declared for a pollutant species emitted from the operational Proposed Development.</p> <p>The impact of NO₂, PM10 and PM2.5 on all human receptors from construction traffic is considered negligible, and therefore not significant. For ecological receptors, impacts can be considered negligible as the predicted nitrogen deposition is less than 1% of the lower critical load for all receptors assessed.</p> <p>The impacts of all pollutant species released from the operational Proposed Development are predicted to result in negligible adverse effects at all receptors within the Study Area. The impact of NO₂, CO, and NH₃ can</p>

GENERIC IMPACT	SUMMARY	ASSESSMENT
	<p>Paragraph 5.2.13 goes on to state that consideration should be given whether mitigation measures are needed for both operational and construction emissions. A construction management plan may help codify mitigation.</p> <p>EN-2 (paragraph 2.5.2) confirms that the applicant should carry out an assessment as required by EN-1, consulting the Environment Agency ('EA') and other statutory consultees.</p> <p>Paragraph 2.6.2 states that there are specific considerations which apply to natural gas electricity generating stations.</p> <p>Paragraph 2.6.3 states that operational CO2 emissions are a significant adverse impact of natural gas electricity generating stations, although a carbon assessment will be provided as part of the ES, as required by Part 2 of EN-1.</p> <p>Paragraph 2.6.4 clarifies that the SoS does not need to assess individual applications against operational carbon emissions and their contributions to carbon budgets, net zero and international climate commitments.</p> <p>Paragraph 2.6.5 states that natural gas generating stations must apply a range of mitigation to minimise</p>	<p>therefore be considered to be not significant at all human health receptors.</p> <p>The impacts of daily NOx at the worst-affected ecological receptor (Keadby Wetland LWS) has been assessed as a medium magnitude of impact. Annual average impacts of NOx at the worst-affected receptor (Humber Estuary Ramsar/ SAC/ SSSI) are considered to have a negligible adverse impact and therefore effects are considered to be not significant. The annual mean NH3 impacts at the worst-affected ecological receptor (Humber Estuary Ramsar/ SAC/ SSSI) is considered to be not significant. Annual average impacts of NH3 for the worst-affected receptor sites that are assigned the lower NH3 critical level for the protection of lichens and bryophytes have a very low/ low magnitude of impact.</p> <p>An assessment of cumulative impacts with other proposed developments that could interact with the impacts and effects of this Proposed Development have been assessed within ES Volume I Appendix 8B: Air Quality – Operational Assessment (Application Document Ref. 6.3.5) and summarised in Chapter 19: Cumulative and Combined Effects (ES Volume I – Application Document Ref. 6.2). The impact of cumulative operational emissions on nutrient nitrogen deposition for relevant habitats is considered in the Habitat Regulations – Appropriate Assessment report</p>

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GENERIC IMPACT	SUMMARY	ASSESSMENT
	<p>NOx and other emissions, which are regulated by the Environment Agency through Environmental Permitting Regulations requiring an Environmental Permit.</p>	<p>(Application Document Ref. 5.2). There were no significant combined or cumulative effects identified in ES Volume I (Cumulative and Combined Effects) (Application Document Ref. 6.2.21).</p> <p>The Applicant has considered the impact of the development on Air Quality through an assessment of carbon emissions included in Chapter 18: Climate Change (ES Volume I Application Document Ref. 6.2.18). Furthermore, it is clear within key government policies that hydrogen is expected to play a large and crucial role in helping the energy sector decarbonise in the future as the UK moves towards its net zero target. The Proposed Development is considered to be fully aligned with current and emerging government policy, and has a crucial part to play in helping the UK's energy grid decarbonise in line with the UK's net zero trajectory.</p> <p>It is therefore considered that, through the use of appropriate mitigation, the Proposed Development is in conformity with EN-1 and EN-2.</p>
<p>Greenhouse gas emissions (EN-1, 5.3)</p>	<p>EN-1 explicitly accepts that some GHG emissions are an inevitable part of developing new energy infrastructure, and that residual emissions may persist beyond the achievement of net zero (paragraph 5.3.1).</p> <p>Applicant's assessments should include a GHG Assessment as part of the ES. This should be used to</p>	<p>A GHG Assessment (Application Document Ref. 7.8) has been provided with the ES. This is an assessment of the Proposed Development's GHG footprint and 'hotspots'. This assesses both operational emissions arising from electricity generation, and those arising from other sources including embodied carbon and operational activities (excluding fuel use).</p>

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GENERIC IMPACT	SUMMARY	ASSESSMENT
	<p>drive down emissions at every stage of the project, taking account of the priorities of security of supply, reliability and affordability (paragraphs 5.3.4 – 5.3.5). Mitigation solutions, set out in a GHG Reduction Strategy, should be controlled by the DCO.</p> <p>In determining DCOs for energy NSIPs, the SoS must be satisfied that the applicant has assessed GHG emissions as far as possible, accepting that some residual emissions are inevitable. Operational emissions are not reasons to prohibit consenting of energy projects as other, non-planning mechanisms exist to decarbonise the energy system, such as the UK Emissions Trading Scheme (paragraph 5.3.11). Operational emissions are to be addressed in a ‘managed, economy-wide manner, to ensure consistency with carbon budgets, net zero and our international climate commitments’ (paragraph 5.3.12).</p>	<p>Emissions arising from electricity generation vary considerably depending upon the date a hydrogen supply becomes available and the degree of fuel blending that takes place before use of 100% hydrogen is achieved. The range is from 7,031,662 tCO₂e to 22,721,829 tCO₂e.</p> <p>Total lifecycle GHG emissions excluding operational fuel use amount to 162,229 tCO₂e, of which 45% is embodied emissions in raw materials used for construction. A GHG Reduction Strategy is included in the GHG Assessment that looks to reduce these emissions as far as possible, in particular through:</p> <ul style="list-style-type: none"> • strategy and governance; • innovative design • lower carbon products and • lean construction techniques. <p>Through implementation of these measures, GHG emissions will be minimised but not eliminated. However, this matter must be seen in the context of the Proposed Development’s role in the decarbonisation of the energy system, including through stimulation of a hydrogen economy and generation of electricity by the most efficient CCGT in Europe.</p>

GENERIC IMPACT	SUMMARY	ASSESSMENT
<p>Biodiversity and geological conservation (EN-1, 5.4; EN-4 2.21; and EN-5, 2.9)</p>	<p>Paragraph 5.4.35 of EN-1 states that during construction appropriate mitigation measures should be included to ensure that activities will be confined to the minimum areas required for the works, to ensure that the risk of disturbance or damage to species is minimised, that habitats will (where practicable) be restored after construction works have finished and opportunities will be taken to enhance existing habitats rather than replace them.</p> <p>Paragraph 5.4.35 of EN-1 also states that, during operation, appropriate mitigation measures should be included to ensure that the risk of disturbance or damage to species is minimised. Development should aim to avoid significant harm to biodiversity and geological conservation interests through mitigation and consideration of reasonable alternatives.</p> <p>Paragraph 5.4.21 also adds that the design process should embed opportunities for nature inclusive design. It states that energy infrastructure projects have the potential to deliver significant benefits and enhancements beyond Biodiversity Net Gain, which result in wider environmental gains. The scope of potential gains will be dependent on the type, scale, and location of each project.</p>	<p>Chapter 11 ‘Biodiversity and Nature Conservation’ of the ES Volume I (Application Document Ref. 6.2.11) provides an assessment of the potential effects of the Proposed Development on biodiversity.</p> <p>The Proposed Development has been sensitively designed and positioned with reference to the existing baseline conditions and potential pathways for impact. As a consequence, no significant adverse residual construction, operation or decommissioning effects are anticipated as a result of construction of the Proposed Development.</p> <p>Proposals suitable to achieve benefits for biodiversity as a direct consequence of the Proposed Development are described and demonstrated within the LBMEP. It also confirms that the proposed enhancement measures are suitable to achieve no net loss and a net gain in biodiversity within the Proposed Development Site. The submission and approval of a final LBEMP is secured by a requirement of Schedule 2 of the draft DCO (Application Document Ref. 3.1).</p> <p>To address the requirement to minimise impact upon fish, a Fish Management Plan, as described in ES Volume I Chapter 11: Biodiversity, Ecology and Nature Conservation (Application Document Ref. 6.2), will be included within the final CEMP which is secured through a Requirement in the Draft DCO (Application Document Ref. 3.1).</p>

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	<p>Paragraph 5.4.37 goes on to state: “[...] There should also be specific measures to minimise impact to fish and aquatic biota by entrainment and impingement or by excessive heat or biocidal chemicals from discharges to receiving waters.”</p> <p>Paragraph 5.4.44 adds that any habitat creation or enhancement delivered for biodiversity net gain should generally be maintained for at least 30 years, or for the lifetime of the project, if longer.</p> <p>Further to this, paragraph 5.4.4 provides more specific guidance to protect and enhance biodiversity and geological conservation interests:</p> <p><i>“The Habitats Regulations set out sites for which an HRA will assess the implications of a plan or project, including Special Areas of Conservation and Special Protection Areas.”</i></p> <p>Paragraph 5.4.5 confirms that <i>“As a matter of policy, the following should be given the same protection as sites covered by the Habitats Regulations and an HRA will also be required:</i></p> <ul style="list-style-type: none"> <i>(a) potential Special Protection Areas and possible Special Areas of Conservation;</i> <i>(b) listed or proposed Ramsar sites; and</i> 	<p>With regards to Habitats Regulations Assessments, in their response to the Section 42 Consultation, Natural England provided a list of designated sites relevant to the application and within 15km of the Proposed Development Site which required assessment for potential operational air quality impacts. The impacts on these designated sites were considered in the Habitat Regulations Assessment Screening Report (Application Document Ref. 5.2).</p> <p>Chapter 13 (Geology, Hydrogeology and Land Contamination) of the ES Volume I (Application Document Ref. 6.2.13) addresses the potential effects of the construction, operation (including maintenance) and decommissioning of the Proposed Development on geology, hydrogeology and land contamination (considering effects to and from any existing contamination and also any potential to cause contamination). It found that effects related to potential geological and land contamination related impacts associated with the Proposed Development during the construction, operation and decommissioning periods are likely to be negligible or minor adverse (not significant).</p> <p>A requirement in Schedule 2 of the draft DCO (Application Document Ref. 3.1) secures details of a scheme to deal with the contamination of land including</p>

GENERIC IMPACT	SUMMARY	ASSESSMENT
	<p><i>(c) sites identified, or required, as compensatory measures for adverse effects on other HRA sites.”</i></p> <p>Further to this, EN-1 (paragraph 5.4.49) confirms that prior to granting development consent, the SoS must, under the Habitats Regulations, ‘consider whether the project is likely to have a significant effect on a protected site which is part of the National Site Network (a habitat site), a protected marine site, or on any site to which the same protection is applied as a matter of policy, either alone or in combination with other plans or projects’.</p> <p>Paragraph 5.4.25 states that the applicant should seek the advice of the appropriate SNCB and provide the SoS with such information as may be reasonably required to determine whether an 'Appropriate Assessment' is required.</p> <p>EN-4 (Section 2.21) considers the effects of gas pipelines on biodiversity. It notes that many effects will be temporary in nature and that applications should include proposals for the reinstatement of the pipeline route to its original state as close as possible.</p> <p>EN-5 (Section 2.9) considers the effects that electricity network infrastructure can have on biodiversity. Paragraph 2.9.6 requires the applicant to</p>	<p>ground water, which is likely to cause significant harm to person or pollution of controlled waters or the environment.</p> <p>There were no significant combined or cumulative effects identified in ES Volume I (Cumulative and Combined Effects) (Application Document Ref. 6.2.21) in terms of biodiversity and geology.</p> <p>It is therefore considered that, through the use of appropriate mitigation, the Proposed Development is in conformity with EN-1, EN-4 and EN-5.</p>

GENERIC IMPACT	SUMMARY	ASSESSMENT
	<p>consider any such possible impacts, particularly on feeding and hunting grounds, migration corridors and breeding grounds for birds.</p> <p>However, Paragraph 2.5.1 emphasises the necessity for the both the Applicant and SoS to supplement generic guidance with the recognition for the excellent opportunities electricity networks infrastructure provide to reconnect important habitats and/or connect people to the environment.</p>	
<p>Civil and military aviation and defence interests (EN-1, 5.5)</p>	<p>EN-1, Section 5.5 notes that civil and military aerodromes and aviation technical sites, as well as other types of defence interests can be affected by new energy developments.</p>	<p>No civil and military aviation and defence interests have been identified through the EIA Scoping or pre-application consultation that would be affected by the Proposed Development. The Applicant consulted the Ministry of Defence ('MOD') Civil Aviation Authority ('CAA'), the Defence Infrastructure Organisation (DIO), Doncaster Sheffield Airport, Humberside International Airport and Leeds Bradford Airport regarding the proposed Development.</p> <p>The MOD/DIO responded on 22/01/2025 stating that the development falls within the Low Flying Area 11 (LFA11) within which military aircraft may conduct low-level flight training. The MOD require that conditions are added to any consent requiring that the development is fitted with aviation safety lighting and that sufficient data is submitted to ensure that structures can be accurately charted to allow deconfliction. The Proposed</p>

GENERIC IMPACT	SUMMARY	ASSESSMENT
		<p>Development includes a stack with a height of 85m above ground level. The Draft DCO (Application Document Ref. 3.1) includes a Requirement regarding aviation safety lighting and charting. The wording of the relevant requirement has been agreed with the MoD/DIO. No other responses were received.</p> <p>Appropriate aviation warning lighting, height of structures and notification of details to the CAA and Defence Geographic Centre are secured prior to commencement through DCO Schedule 2 Requirements 34 'Aviation warning light and 35 and 36 'Air Safety' (Application Document Ref. 3.1).</p> <p>It is therefore considered that, through appropriate mitigation, the Proposed Development is in conformity with EN-1.</p>
Coastal Change (EN-1, 5.6)	<p>Paragraph 5.6.3 of EN-1 states that, 'For the purposes of this section, coastal change means physical change to the shoreline, i.e. erosion, coastal landslip, permanent inundation and coastal accretion.'</p> <p>Paragraph 5.6.8 states, 'This section only applies to onshore energy infrastructure projects situated on the coast.' The Proposed Development is not located on the coast and therefore no assessment against this generic impact is required.</p>	None required.

GENERIC IMPACT	SUMMARY	ASSESSMENT
<p>Dust, odour, artificial light, smoke and steam (EN-1, 5.7 and EN-2, 2.5)</p>	<p>EN-1 acknowledges that the construction/demolition, operation and decommissioning of energy infrastructure has the potential for the release of a range of emissions such as odour, dust, steam, smoke and artificial light.</p> <p>Paragraph 5.7.6 of EN-1 provides advice regarding the assessment of these impacts. It is advised that the assessment should describe:</p> <ul style="list-style-type: none"> • “the type, quantity and timing of emissions; • aspects of the development which may give rise to emissions; • premises or locations that may be affected by the emissions; • effects of the emissions on identified premises or locations; and • measures to be employed in preventing or mitigating the emissions.” <p>Paragraph 5.7.12 of EN-1 states that, in decision making, the SoS should be satisfied that an assessment of the potential effects in respect of artificial light, dust, odour, smoke and steam has been carried out; and be satisfied that all reasonable steps have been taken to minimise any detrimental impacts.</p>	<p>Chapter 8 ‘Air Quality’ of the ES Volume I (Application Document Ref. 6.2.8) sets out the potential emissions to air from the construction, operation and decommissioning of the Proposed Development. In particular, the chapter considers potential impacts on identified human health and ecological receptors in terms of dust generation during construction.</p> <p>Odour, artificial light, smoke and steam are dealt with in the Statutory Nuisance Statement (Application Document Ref. 5.3), which identifies the matters set out at Section 79(1) of the EPA in respect of statutory nuisance and considers if the Proposed Development could result in a nuisance and the measures, where relevant, to prevent and mitigate such nuisance occurring.</p> <p>Section 3 of the Statutory Nuisance Statement provides an assessment of the potential for nuisance taking account of the assessments undertaken for the EIA. The matters considered include the condition/state of premises; smoke; fumes or gases; dust, steam, smell or other effluvia; accumulations or deposits; keeping of animals; insects; artificial light; noise; and any other matter declared by enactment to be statutory nuisance. A number of matters are not relevant to the Proposed Development and are of more relevance to other form of infrastructure (e.g. insects in respect of waste facilities; and keeping on animals).</p>

GENERIC IMPACT	SUMMARY	ASSESSMENT
	<p>NPS EN-2, section 2.5 addresses air quality issues, including release of dust, associated with Selective Catalytic Reduction, which reduces NOx emissions through the injection of reagents into flue gases. The SoS must be satisfied that any adverse impacts arising from this mitigation have been described in the ES and taken into account in the assessments.</p>	<p>Taking account of mitigation no statutory nuisance effects are considered likely to occur as a result of the Proposed Development. Mitigation is both embedded within the design of the Proposed Development and mitigation and controls will be secured during both construction and operation by a number of requirements set out in Schedule 2 of the draft DCO (Application Document Ref. 3.1). Examples of embedded measures include:</p> <ul style="list-style-type: none"> • avoid mechanical roughening or grinding of concrete surfaces, where appropriate; • store sand and aggregates in bunded areas and store cement powder and fine materials in silos, where appropriate; • use water suppression and regular cleaning to minimise mud on roads, and control dust during earth moving activities; • cover vehicles leaving the construction site that are carrying waste materials or spoil; • employ wheel wash systems at site exits; • restrict, where practicable, the use of unmade road accesses; • minimising duration of storage of topsoil or spoil during pipeline construction; and • prohibit open fires on site.

GENERIC IMPACT	SUMMARY	ASSESSMENT
		<p>Furthermore, the operation of the Proposed Development would be regulated by the EA through environmental permitting and would undergo regular monitoring and reporting.</p> <p>Regarding the EN-2 requirement to assess the impact of SCR, ES Volume II, Appendix 8B Air Quality Operational Assessment (Application Document Ref. 6.3.5) confirms that SCR may be required to achieve the required NOx emissions concentrations for the Proposed Development. The potential impact of this is assessed at paragraphs 8B.3.6 - 8B.3.8 and Table 8B.3.</p> <p>It is therefore considered that, through appropriate mitigation and management, the Proposed Development is in conformity with EN-1 and EN-2.</p>
<p>Flood risk (EN-1, 5.8; EN-4, 2.3; and EN-5, 2.3.</p>	<p>Paragraph 5.8.13 of EN-1 requires that applications for energy developments of 1 hectare or greater in Flood Zone 1 in England and all proposals for energy developments located in Flood Zones 2 and 3 in England should be accompanied by a Flood Risk Assessment ('FRA').</p> <p>Paragraph 5.8.15 goes on to detail the minimum requirements for FRAs, which includes consideration of how the ability of water to soak into the ground may change with development, how the proposed layout</p>	<p>Chapter 12 'Water Environment and Flood Risk' of the ES Volume I (Application Document Ref. 6.2.12) provides an assessment of likely significant effects on the water environment and flood risk as a result of construction, operational and decommissioning phases of the Proposed Development. A site-wide Flood Risk Assessment ('FRA') is provided at Appendix 12A of ES Volume III (Application Document Ref. 6.3.20).</p> <p>In terms of fluvial and tidal flood risk, the entire Proposed Development Site is within Flood Zone 3. However, the flood defences are sufficient to prevent</p>

GENERIC IMPACT	SUMMARY	ASSESSMENT
	<p>of the project may affect drainage systems, and a range of specified information.</p> <p>Paragraph 5.8.9 of EN-1 requires application of the Sequential Test, which directs development, where possible and consistent with other environmental objectives, to areas of lowest flood risk. Where it is not reasonable to locate the development on alternative sites (or no such sites exist), the Exception Test can be applied. This allows development to proceed where (i) there would be wider sustainability benefits; and (ii) the project would be safe from flooding for its lifetime.</p> <p>Similar considerations apply to gas supply pipelines (EN-4, paragraph 2.3.3) and in relation to substations that are vital for the electricity transmission and distribution network (EN-5, paragraph 2.3.2). Applicants should set out how their developments will be resilient to flooding and not result in an increased risk of flooding.</p>	<p>overtopping during events with a 0.5% annual probability, the overall sensitivity to fluvial flooding is therefore considered 'Low'. This is with the exception of the southern access route and construction laydown area.</p> <p>The construction and operation of the Proposed Development is considered to have a mixture of slight adverse (not significant) and neutral (not significant) effects on the River Trent, Stainforth and Keadby Canal and the various drains in the area. The Proposed Development is resilient to flooding and will not result in an increased risk of flooding elsewhere.</p> <p>The location comprises largely previously developed land and the Proposed Development provides extensive wider sustainability benefits due to its role in providing high amounts of low carbon electricity generation consistent with the urgent need identified in EN-1 paragraph 3.3.58 and which is corroborated by recent policy in the EWP and recent official evidence from the CCC and NIC.</p> <p>The site selection process involved the assessment of reasonable alternative locations for the Proposed Development. None of the alternatives were at lower risk of flooding and therefore none were sequentially superior. Therefore, the Sequential Test is passed. The Proposed Development also satisfies the Exception</p>

GENERIC IMPACT	SUMMARY	ASSESSMENT
		<p>Test, with ES Volume I Chapter 12, (Water Environment and Flood Risk) (Application Document Ref. 6.2.12) and ES Volume II Appendix 12A: Flood Risk Assessment (Application Document Ref. 6.3.16) demonstrating that it would be safe and not result in significant effects in terms of flooding. The EA has reviewed the Flood Risk Assessment undertaken by the Applicant at various stages pre application.</p> <p>Details of the flood risk mitigation measures detailed within the DCO Application are secured by a requirement of the draft DCO (Application Document Ref. 3.1). Details of surface and foul water drainage (taking account of flood risk mitigation) are secured by requirements of the draft DCO.</p> <p>There were no significant combined or cumulative effects identified in ES Volume I (Cumulative and Combined Effects) (Application Document Ref. 6.2.21).</p> <p>It is therefore considered that, through appropriate mitigation and management, the Proposed Development is in conformity with EN-1, EN-2 and EN-5.</p>
Historic environment (EN-1, 5.9)	Section 5.9 of EN-1 acknowledges that the construction, operation and decommissioning of energy infrastructure has the potential to result in adverse impacts on the historic environment.	Chapter 15 ‘Cultural Heritage’ of the ES Volume I (Application Document Ref. 6.2.15) considers potential impacts on designated heritage assets and non-designated heritage assets.

GENERIC IMPACT	SUMMARY	ASSESSMENT
	<p>Paragraph 5.9.9 requires applicants to provide an assessment of any likely significant heritage impacts of the Proposed Development as part of the EIA. Paragraph 5.9.10 requires a description of the significance of the heritage assets affected by the proposed development and the contribution of their setting to that significance.</p> <p>Where a development site affects, or possibly includes heritage assets with an archaeological interest, the applicant should carry out an appropriate desk-based assessment (paragraph 5.9.11).</p> <p>The extent of the impact of the proposed development on the significance of any heritage asset affected should be able to be adequately understood from the application documents (paragraph 5.9.12).</p> <p>Paragraph 5.9.22 states that the SoS should assess the significance of any heritage asset that may be affected by the proposed development. In determining applications for energy NSIPs, the SoS should take into account the nature of the significance of the heritage asset, the desirability of sustaining and enhancing that significance and the part the Proposed Development can make in that regards, and should give great weight to the asset's conservation (paragraph 5.9.27). Substantial harm to a designated heritage asset should result in refusal of consent,</p>	<p>The search area for the identification of non-designated assets was defined as 1km from the Proposed Development Site, with an extension to include the Isle of Axholme Area of Special Historic Interest. The study area for the identification of designated assets and the potential impacts caused by development within their settings is set at 3km, with an extension to 5km for designated assets of the highest value (namely, World Heritage Sites, Scheduled Monuments and Grade I listed buildings).</p> <p>Within the study area 19 designated heritage assets including the Keadby Lock grade II listed Scheduled Monument, are scoped into the assessment.</p> <p>Of these assessed heritage assets, the impact upon two is considered significant:</p> <ul style="list-style-type: none"> Organic (peaty) deposits [MLS27193] and earlier buried land surfaces [MLS27196]; and • Potential palaeoenvironmental remains located within the Main Site and Construction Laydown Area south of the Stainforth and Keadby Canal. <p>In terms of mitigation, design measures to enable preservation in-situ of archaeological remains would be considered in the first instance. However, where preservation in-situ is not viable, potential impacts to archaeological remains can be mitigated through a</p>

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	<p>unless the harm is necessary to achieve substantial public benefits that outweigh the harm (paragraph 5.9.31). Where the impact amounts to less than substantial harm, this should be weighed against the public benefits of the proposal (paragraph 5.9.32).</p>	<p>proportionate programme of archaeological investigation, recording and reporting. This would not result in a reduction in the physical impacts to archaeological remains but would compensate for their loss as it would provide greater understanding and appreciation of the evidential value of archaeological remains. An Outline Written Scheme of Investigation (OWSI) (Application Document Ref. 7.7) has been agreed with NLC and approval of the final written scheme of investigation is secured by a requirement in the draft DCO.</p> <p>With this mitigation in place, the residual impact upon these heritage assets is considered to be not significant.</p> <p>It is therefore considered that the Proposed Development is in conformity with EN-1.</p>
<p>Landscape and Visual (EN-1, 5.10, EN-2, 2.4 and 2.6; EN-4, 2.21; and EN-5, 2.9</p>	<p>Paragraph 5.10.1 states that: "The landscape and visual effects of energy projects will vary on a case by case basis according to the type of development, its location and the landscape setting of the proposed development. In this context, references to landscape should be taken as covering seascape and townscape where appropriate."</p> <p>Paragraph 5.10.2 continues: "Among the features which are common to a number of different thermal combustion technologies, cooling towers and exhaust stacks and their plumes have the most obvious</p>	<p>Chapter 14 'Landscape and Visual Amenity' of the ES Volume I (Application Document Ref. 6.2.14) addresses the potential effects of the construction, opening, operation (including maintenance) and decommissioning of the Proposed Development on landscape character (as a resource in its own right) and visual amenity.</p> <p>Views of the Proposed Development other than those assessed are acknowledged to exist. The viewpoints are not intended to provide an exhaustive or fully comprehensive catalogue of views of the Site, rather</p>

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	<p>impact on landscape and visual amenity. Visual impacts may be not just the physical structures but also visible steam plumes from cooling towers.”</p> <p>Paragraph 5.10.4 states that “Landscape effects arise not only from the sensitivity of the landscape but also the nature and magnitude of change proposed by the development, whose specific siting and design make the assessment a case-by-case judgement.”</p> <p>Paragraph 5.10.5 states that “Virtually all nationally significant energy infrastructure projects will have adverse effects on the landscape, but there may also be beneficial landscape character impacts arising from mitigation.”</p> <p>Paragraph 5.10.6 states that “Projects need to be designed carefully, taking account of the potential impact on the landscape. Having regard to siting, operational and other relevant constraints the aim should be to minimise harm to the landscape, providing reasonable mitigation where possible and appropriate.”</p> <p>Paragraph 5.10.13 acknowledges that “All proposed energy infrastructure is likely to have visual effects for many receptors around proposed sites and paragraph 5.10.14 states that the SoS will weigh the visual effects against the benefits of the project.”</p>	<p>they are those considered by the applicant and consultees to be the views most likely to be impacted.</p> <p>The assessment has determined that the Proposed Development is likely to result in a significant adverse effect on visual amenity from viewpoints 1 (Chapel Lane West, Keadby), 2 (Gate Keepers Residence, Keadby) and 4 (PRoW (KEAD9, KEAD10) north of Keadby) as a result of the close distance to the Proposed Development Site and lack of intervening vegetation.</p> <p>Since it is considered that mitigation measures would not be effective in reducing this impact, none are proposed. As such, the significant adverse effects will remain during the construction, operation and decommissioning of the Proposed Development.</p> <p>The Design and Access Statement (Application Document Ref. 5.6) submitted with this DCO application has regard to the design principles and identifies how the design and materials to be used for the Proposed Development respect the surrounding context of the area.</p> <p>Approval of the detailed design of the Proposed Development will be secured via a requirements in Schedule 2 of the draft DCO (Application Document Ref. 3.1).</p>

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	<p>Paragraph 5.10.16 outlines that “The applicant should carry out a landscape and visual impact assessment and report it in the ES, including cumulative effects.”</p> <p>Paragraph 5.10.19 also clarifies that “The applicant should consider landscape and visual matters in the early stages of siting and design, where site choices and design principles are being established.”</p> <p>Paragraph 5.10.35 acknowledges that “The scale of energy projects means that they will often be visible across a very wide area. The Secretary of State should judge whether any adverse impact on the landscape would be so damaging that it is not offset by the benefits (including need) of the project.”</p> <p>Paragraph 5.10.37 states that “The Secretary of State should consider whether the project has been designed carefully, taking account of environmental effects on the landscape and siting, operational and other relevant constraints, to minimise harm to the landscape, including by appropriate mitigation.”</p> <p>EN-2 section 2.4 acknowledges that the main structures for natural gas generating stations will be large and will have an impact on the surrounding landscape. This impact is required to be assessed as part of the ES. Section 2.6 addresses SoS decision</p>	<p>There were no significant combined or cumulative effects identified in ES Volume I (Cumulative and Combined Effects) (Application Document Ref. 6.2.21).</p> <p>Overall, the Proposed Development is considered to be compliant with NPS policy as the benefits of the Proposed Development outweigh the impacts on Viewpoints 1, 2 and 4. It is therefore considered that the Proposed Development is in conformity with EN-1, EN-2, EN-4 and EN-5.</p>

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	<p>making regarding landscape and visual matters. Where the location of the proposal is appropriate and it has been sensitively designed (taking account of relevant constraints), the visibility of the proposal should be given limited weight in the planning balance.</p> <p>EN-4 section 2.21 addresses the impact of pipelines on the landscape. The ES is required to include assessment of this and consider alternative routes. Reinstatement (as far as possible) of the pipeline route is required and where this is not possible measures to avoid, mitigate or compensate the impact should be set out.</p> <p>EN-5 section 2.9 addresses the landscape impact of electricity network infrastructure. At the outset, EN-5 paragraph 2.9.7 accepts that overhead lines can give rise to adverse landscape and visual impacts. These should be assessed in the ES, relying upon the Holford and Horlock Rules.</p>	
Land use including open space, green infrastructure, and Green	Section 5.11 of EN-1 recognises that energy infrastructure projects will have a direct effect on the existing use of the proposed site and that there may be particular effects on open space, including green and blue infrastructure. It also recognises that while reuse of previously developed land is preferable, it	Chapter 3 (The Site and Surrounding Area) of the ES Volume I (Application Document Ref. 6.2.3) covers in detail the existing land uses of the Site and the surrounding area.

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<p>Belt (EN-1, 5.11)</p>	<p>may not always be possible to avoid use of greenfield land. EN-1 also recognises that soil resources may be affected, including through contamination and physical loss.</p> <p>Applicants are required to identify through the ES existing and proposed land uses near the project and how the project might affect those uses. This includes consideration of open space, sports and recreation land, green and blue infrastructure, which applicants should consider providing, in consultation with local communities.</p> <p>Adverse impacts on soil quality should be avoided where possible and mitigated if necessary, through a Soil Management Plan. Wherever possible, development should look to improve the local environment in terms of air and water quality.</p> <p>In determining DCOs for energy NSIPs, the SoS is required by EN-1 to consider any adverse impact on green infrastructure and measures to mitigate this. Paragraph 5.11.27 states that, “Existing trees and woodlands should be retained wherever possible.” Where loss of woodland is unavoidable, compensation schemes, along with long-term management plans, will be required.</p>	<p>The Keadby Power Station site has been selected by the Applicant for the development of a Low Carbon Gas Generating Station, as opposed to other potentially available sites for the following reasons:</p> <ul style="list-style-type: none"> • The Proposed Development Site has excellent existing electrical grid, gas, water and transport links, specifically the National Grid electricity and natural gas transmission networks; • The Site is a brownfield site which is considered more appropriate in general planning terms to redevelop for large scale power generation than a greenfield one; • The Site’s location of the minimises interference with the Landscape and Creative Conservation Plan for Keadby 2 Power Station and specifically, the Habitat Management Areas secured via Conditions 31-34 inclusive of the Section 36 consent for Keadby 2 Power Station; • the Site provides sufficient space to accommodate the required scale of power generation (in particular, a single high efficiency CCGT unit), without encroaching on the exclusion areas for the Keadby Wind Farm turbines to the north and the existing overhead lines to the south and east;

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	<p>Paragraph 5.11.3 states, ‘Although the re-use of previously developed land for new development can make a major contribution to sustainable development by reducing the amount of countryside and undeveloped greenfield land that needs to be used, it may not be possible for many forms of energy infrastructure.’</p> <p>Paragraph 5.11.4 states, ‘Development of land will affect soil resources, including physical loss of and damage to soil resources, through land contamination and structural damage. Indirect impacts may also arise from changes in the local water regime, organic matter content, soil biodiversity and soil process.’</p> <p>Paragraph 5.11.5 states, ‘Where pre-existing land contamination is being considered within a development, the objective is to ensure that the site is suitable for its intended use. Risks would require consideration in accordance with the contaminated land statutory guidance as a minimum.’</p>	<ul style="list-style-type: none"> • the majority of Site is wholly in the ownership of the Applicant; and • The Site is located in close proximity to the existing Keadby 1 and proposed Keadby 2 Power Stations, providing opportunities for synergies, efficiencies and thus economic and environmental benefits for the Proposed Development. <p>Regarding potential contamination, ground investigation will be undertaken before construction to inform the development of the detailed design. The ground investigation will validate the assumptions made in the initial Conceptual Site Model and Preliminary Risk Assessment (ES Volume II Appendix 13A (Application Document Ref. 6.3)), taking into consideration results of previous ground investigations, and provide site-specific data upon which to base a land contamination risk assessment. The ground investigation will be designed to target the potentially contaminative sources identified, including the historical landfilling activities identified on the Site. Based on the findings of the 2022 Fugro ground investigation (ES Volume II Appendix 13A (Application Document Ref. 6.3)) further investigation and risk assessment of groundwater quality and ground gas will be undertaken. Where risks are deemed to be</p>

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		<p>unacceptable, further detailed quantitative risk assessment and if required, detailed remediation strategies will be developed accordingly, pursuant to the process set out by the planning authorities</p> <p>These measures mean the Proposed Development is in conformity with EN-1.</p>
<p>Noise and vibration (EN-1, 5.12; EN-2, 2.4, 2.5 and 2.6; EN-4, 2.21; and EN-5, 2.9)</p>	<p>EN-1 (Section 5.12) requires a noise assessment for development that is likely to cause noise impacts through operational use and proximity to noise sensitive receptors.</p> <p>Paragraph 5.12.6 expands on the guidance for mitigating noise.</p> <p>Paragraph 5.12.15 of EN-1 requires demonstration of good design through selection of the quietest or most acceptable cost-effective plant available; containment of noise within buildings wherever possible, taking into account any other adverse impacts that such containment might cause (e.g. on landscape and visual impacts; optimisation of plant layout to minimise noise emissions and, where possible, the use of landscaping, bunds or noise barriers to reduce noise transmission).</p> <p>Paragraph 5.12.17 goes on to state that the SoS should not grant development consent unless they</p>	<p>Chapter 9 ‘Noise and Vibration’ of the ES Volume I (Application Document Ref. 6.2.9) addresses the potential noise and vibration effects resulting from the Proposed Development on local Noise Sensitive Receptors (‘NSR’). Impacts during the construction, operation (including maintenance) and decommissioning of the Proposed Development are assessed.</p> <p>The location of potential NSR in proximity to the Proposed Development Site boundary has been considered when assessing the effects associated with noise and vibration levels from the construction, operational (including maintenance) and decommissioning phases of the Proposed Development.</p> <p>The likely residual effects related to the construction operation (including maintenance), and decommissioning phases of the Proposed Development, assuming the implementation of appropriate mitigation to reduce noise and vibration, are considered to be not significant due to the mitigation outlined in Chapter 9.</p>

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	<p>are satisfied that the proposals will meet the following aims, through the effective management and control of noise:</p> <ul style="list-style-type: none"> avoid significant adverse impacts on health and quality of life from noise; mitigate and minimise other adverse impacts on health and quality of life from noise; and where possible, contribute to improvements to health and quality of life through the effective management and control of noise. <p>EN-2, covers noise and vibration in relation to fossil fuel generating stations. Paragraph 2.4.29 confirms that the ES should include a noise assessment, while section 2.5 acknowledges that noise impacts may be unavoidable, but should be mitigated through careful plant selection. Paragraph 2.6.15 states that the SoS should be satisfied that noise will be adequately mitigated through requirements. Furthermore, paragraph 2.6.16 states that consideration should be given to the extent that operational noise will be separately controlled by the EA.</p> <p>EN-4, Section 2.21 deals with the noise and vibration effects of gas supply pipelines. Paragraphs 2.21.1-2.21.22 note that there will be noise and possibly vibration effects during the construction phase and also possibly during commissioning as a result of</p>	<p>The Landscaping and Biodiversity Enhancement and Management Plan Report ('LBMEP') (Application Document Ref. 5.10) sets out a number of development design and impact avoidance measures that would be employed to limit and mitigate noise and vibration effects. These include:</p> <ul style="list-style-type: none"> • Updated species surveys; • Obtaining protected species licences; • Presence of a Clerk of Works to be present during construction; • Protective fencing around existing trees; • Retention of felled timber to provide a supply of deadwood for wildlife; • Use of precautionary working methods (to be controlled and implemented through the Construction Environment Management Plan (CEMP)); and • Animal welfare measures, including mammal/badger gates in boundary fences and excavations to be covered overnight where practical. <p>The LBMEP is secured by a requirement of Schedule 2 in the draft DCO (Application Document Ref 3.1). Further requirements require schemes to be submitted and approved relating to the monitoring and control of</p>

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	<p>drying after hydrotesting and using air compressors. A new gas pipeline (paragraph 2.21.21) may require an above ground installation. These may be located in quiet rural areas and therefore the control of noise from these facilities is likely to be an important consideration.</p> <p>Section 2.22 outlines mitigation measures for pipelines, including, amongst others:</p> <ul style="list-style-type: none"> • Screening or enclosure of compressors and pumps; • use of sound attenuators on ventilation systems; • acoustic lagging of pipework; • Multi-stage (inherently quiet) control valves; • Gas turbine exhaust silencers; • High efficiency low speed cooler fans; and • Non-impact piling such as auger boring. <p>EN-5 (paragraph 2.11.7) requires relevant assessment methodologies to assess the noise impacts from the proposed electricity network infrastructure. It goes on to state that (paragraph 2.10.9) mitigation measures that should be followed, including the positioning of lines to help mitigate noise through:</p>	<p>noise and vibration during construction, and the management and monitoring of noise during operation, respectively.</p> <p>The CEMP, provision of which is a Requirement of the draft DCO (Application Document Ref. 3.1) will include vibration mitigation measures including the selection of quiet plant to reduce noise emissions, potentially the use of resonance-free vibratory drivers for sheet piling, and non-vibratory methods of compaction, where required. A Framework CEMP is provided at Application Document Ref. 7.4.</p> <p>Detailed design will be controlled by a Requirement in the DCO and measures that may be considered include the selection of external cladding, louvres / baffles that provide a suitable weighted sound reduction; the potential to design acoustically treated stacks; and the potential to design cladding, louvres/ baffles, silencers and air inlets to reduce tonal noise from the Proposed Development.</p> <p>There were no significant combined or cumulative effects identified in ES Volume I (Cumulative and Combined Effects) (Application Document Ref. 6.2.21).</p>

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	<ul style="list-style-type: none"> • the positioning of the lines to help mitigate noise; • ensuring that the appropriately sized conductor arrangement is used to minimise potential noise; • quality assurance through manufacturing and transportation to avoid damage to overhead line conductors which can increase potential noise effects; and • ensuring that conductors are kept clean and free of surface contaminants during stringing/installation; and • The selection of quieter cost-effective plants. 	<p>It is therefore considered that, with appropriate mitigation, the Proposed Development is in conformity with EN-1, EN-2, EN-4 and EN-5.</p>
Socio-economic (EN-1, 5.13)	<p>Paragraph 5.13.1 of EN-1 acknowledges that the construction, operation and decommissioning of energy infrastructure may have socio-economic impacts at local and regional levels.</p> <p>Paragraph 5.13.4 states that the assessment within the ES should consider all relevant socio-economic impacts.</p> <p>Paragraph 5.13.9 confirms that SoS will have regard to the potential socio-economic impacts of new energy infrastructure.</p>	<p>Chapter 16 ‘Socio-Economics’ of the ES Volume I (Application Document Ref. 6.2.16) addresses the potential effects of the construction, operation (including maintenance) and decommissioning of the Proposed Development on employment, local businesses and the local population.</p> <p>Based on the gross construction worker requirements for construction of the Proposed Development and the additionality factors outlined in Chapter 16, 553 net construction jobs would be generated, of which 331.5 are expected to be from the Scunthorpe Travel To Work Area (‘TTWA’). This is considered to result in a major beneficial (significant) residual effect.</p>

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	<p>Paragraph 5.13.8 states that it should be considered whether mitigation measures are necessary to mitigate any adverse socio-economic impacts of a development.</p>	<p>It is estimated that the total net employment for the Proposed Development during operation is up to 58 employees. Of these, 50 are anticipated to be from the TTWA, and 8 outside the Scunthorpe TTWA.</p> <p>The power generation elements of the Proposed Development are expected to operate for a minimum of 25 years. At the end of the expected design life, elements would be assessed for ongoing viability and, only if no longer viable, be decommissioned. It is therefore anticipated that, at the earliest, decommissioning of the Proposed Development would be expected to commence at some point after 2051.</p> <p>There is limited information available at this stage regarding decommissioning methods and timescales. As a worst-case scenario, this would result in similar impacts to the construction phase.</p> <p>The people employed to decommission the Proposed Development would have an effect on the economy by spending their wages in the same way that those employed in the other stages. Overall, the decommissioning phase of the Proposed Development will have a minor (not significant) beneficial effect on employment in the Wider Impact area.</p>

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		<p>No significant adverse effects are predicted during the construction, maintenance, operation and decommissioning of the Proposed Development, and as such no specific mitigation is required.</p> <p>There were no significant combined or cumulative effects identified in ES Volume I (Cumulative and Combined Effects) (Application Document Ref. 6.2.21).</p> <p>It is therefore considered that the Proposed Development is in conformity with EN-1.</p>
<p>Traffic and transport (EN-1, 5.14; EN-2, 2.4.5-2.4.6)</p>	<p>EN-1 (paragraph 5.14.5) states that if a proposed development is likely to have significant transport implications, the applicant’s ES should include a transport assessment. The DfT’s Transport Analysis Guidance (TAG) and Welsh Governments WeITAG provides guidance on modelling and assessing the impacts of transport schemes.</p> <p>Paragraph 5.14.6 outlines that National Highways and Highways Authorities are statutory consultees on NSIP applications including energy infrastructure where it is expected to affect the strategic road network and / or have an impact on the local road network. Applicants should consult with National Highways and Highways Authorities as appropriate on</p>	<p>ES Volume I Chapter 10 ‘Traffic and Transport’ (Application Document Ref. 6.2.10) addresses the potential effects of the Proposed Development on traffic and transport. A Transport Assessment is provided at ES Volume II Appendix 10A (Application Document Ref. 6.3.10). A Construction Worker Travel Plan (‘CWTP’) is secured by a requirement of Schedule 2 of the draft DCO (Application Document Ref. 3.1). A framework CWTP can be found at Application Document Ref. 7.6.</p> <p>National Highways were first consulted when they provided their scoping opinion in May 2024 to recommend a number of factors which are required to be included within the ES Volume 1 Chapter 10 ‘Traffic and Transport’ (Application Document Ref. 6.2.10).</p>

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	<p>the assessment and mitigation to inform the application to be submitted.</p> <p>Paragraph 5.14.7 requires applicants to prepare a travel plan including demand management measures to mitigate transport impacts.</p> <p>Paragraph 5.14.11 states that where mitigation is needed, possible demand management measures must be considered.</p> <p>EN-2 (paragraph 2.4.4) states new fossil fuel generating stations need to be accessible for the delivery and removal of construction materials, fuel, waste and equipment and for employees, while paragraph 2.4.5 notes that the Government supports the multi-modal transportation of materials by water or rail where possible.</p>	<p>Following this, they responded to the PEIR Consultation in February 2025 with a number of comments and requests for clarification. In particular, NH requested a range of reasonable operational scenarios using a variety of trip rates.</p> <p>Access to and from the Proposed Development Site for all construction workers would be via the existing site entrance which was used for the construction of Keadby 2 Power Station, located off the A18. However, during the works to replace Mabey Bridge workers would temporarily use the skew bridge approximately 100m east of Mabey Bridge on the A18.</p> <p>During construction traffic movements will be controlled during the Proposed Development construction phase in order to minimise potential impacts on the surrounding road network, namely construction HGV arriving or departing the Proposed Development Site. As with the construction of Keadby 2 Power Station, a TTRO is proposed to reduce speed on the A18 in the vicinity of the Proposed Development access from the A18 during the construction phase.</p> <p>In addition to the above, the Applicant would implement a range of good practice mitigation measures during the construction phase to minimise traffic impacts upon local highways, including:</p>

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		<ul style="list-style-type: none"> • implementation of the CTMP which includes measures and procedures to encourage construction workers to adopt modes of transport which reduce reliance on single occupancy private car use. A Framework CTMP (Application Document Ref. 7.5) has been prepared and is included in the Application; and • liaison with the appointed contractor for the potential to implement construction worker minibuses and car sharing options (considered as part of the Framework CTMP (Application Document Ref. 7.5)). • Implementation of the final CTMP to include measures to control the routing and impact of HGV on the local road network during construction. A routing plan will be provided in the final CTMP which HGV drivers would be required to adhere to. The CTMP would be secured by a Requirement of the draft DCO (Application Document Ref. 3.1); and • During the commissioning and operational working with contractors and suppliers to ensure that all relevant materials (including chemicals) brought to/removed from the Site that are classified as hazardous are transported in compliance with applicable regulations including the Carriage of Dangerous Goods and Use of Transportable Pressure Equipment Regulations

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		<p>2009 (CDG Regs) (as amended). This will include, for example:</p> <ul style="list-style-type: none"> – consignments being marked with the familiar “Emergency Action Codes”; and – including a telephone number for advice in the event of an emergency. <p>The Contractor will review options for the use of waterborne transport when sourcing construction materials.</p> <p>The additional traffic due to Proposed Development construction activities would result in small, temporary increases of traffic flows, including HGV, on the roads leading to the Proposed Development Site. In line with the significance criteria presented herein and in the Appendix 10A (ES Volume II - Application Document Ref. 6.3), the effects of construction traffic on all road sections and junctions are anticipated to be negligible and thus not significant. Notwithstanding this, a number of traffic management measures, as outlined above, would be implemented during the Proposed Development construction phase to minimise traffic impacts upon the local road network.</p> <p>The generation of traffic during Proposed Development operation would be minimal when compared to the construction phase. Therefore, Proposed Development</p>

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		<p>operational phase traffic effects are also considered to be negligible and thus not significant.</p> <p>The generation of traffic during the decommissioning phase is expected to involve traffic movements associated with the removal (and recycling, as appropriate) of material arising from demolition and potentially the import of materials for land restoration and re-instatement. However, the effects of decommissioning traffic would be no greater than that of the construction traffic and are, therefore, anticipated to be negligible and thus not significant. Notwithstanding, a DTMP would be implemented during the decommissioning phase to control the impact and routing of HGV.</p> <p>It is anticipated that delivery of Abnormal Indivisible Loads (AIL) will use the same route as used for similar deliveries associated with the construction of Keadby 2 Power Station. It is expected that AILs will be received at the Port of Immingham and transported down the River Trent by boat to the Waterbourne Transport Off-loading Area (Railway Wharf), which is included within the Site boundary for the Application and shown at ES Volume III, Figure 3.3: Indicative Parts of the Site Plan (Application Document Ref. 6.4). The components will then be transported to the Site crossing the B1392 onto the temporary haul road that runs to the east of PD Port Services ('Additional AIL Route') and via Keadby Power</p>

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		<p>Station. Traffic management in the form of Stop/Go signs will be required to halt traffic along the B1392 in order to allow the abnormal loads to cross the B1392. The smaller abnormal loads are expected to be transported by road from Immingham Dock via the M180 to Junction 2 and then from the A161 to the A18, entering the Site via either the perpendicular construction access off the A18 and then North Pilfrey Bridge. Both routes are included within the indicative Site Boundary for the Application.</p> <p>Measures relating to traffic and transport are secured in Schedule 2 of the draft DCO (Application Document Ref. 3.1) by requirements relating to 'Protection of highway surfaces', 'Temporary haul road (traffic management and protection)', 'Temporary haul road (removal and restoration)', 'Pilfrey laydown (design)', 'Pilfrey laydown (removal and restoration)', 'Construction traffic management plan' and 'Construction worker travel plan', a decommissioning traffic management plan (Decommissioning).</p> <p>There were no significant combined or cumulative effects identified in ES Volume I (Cumulative and Combined Effects) (Application Document Ref. 6.2.21).</p> <p>It is therefore considered that the Proposed Development is in conformity with EN-1 and EN-2.</p>

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<p>Resource and Waste management (EN-1, 5.15)</p>	<p>Section 5.15 of EN-1 acknowledges that all large infrastructure Proposed Developments are likely to generate hazardous and non-hazardous waste.</p> <p>Paragraph 5.15.8 requires applicants to set out the arrangements that are proposed for managing any waste produced and prepare a report that sets out the sustainable management of waste and use of resources throughout any relevant demolition, excavation and construction activities.</p> <p>Paragraph 5.15.10 states that the applicant should seek to minimise the volume of waste produced and the volume of waste sent for disposal unless it can be demonstrated that this is the best overall environmental outcome.</p> <p>Paragraph 5.15.12 states that applicants are encouraged to source materials from recycled or reused sources and use low carbon materials, sustainable sources and local suppliers. Construction best practices should be used to ensure that material is reused or recycled onsite where possible.</p> <p>Paragraph 5.15.13 states that “Applicants are also encouraged to use construction best practices in relation to storing materials in an adequate and</p>	<p>The Applicant will require that the appointed contractor produces and maintains a final CEMP to control site activities to minimise any impact on the environment. The final CEMP will include industry best practice measures, and specific measures set out in the ES in accordance with the Framework CEMP (Application Document Ref. 7.1).</p> <p>Chapter 5: Construction programme and Management of the Environmental Statement – Volume I (Document Ref. 6.2) states the re-use of excavated materials during construction will be governed by either a Materials Management Plan developed in accordance with relevant guidance including ‘The Definition of Waste: Development Industry Code of Practice’ (CL:AIRE, 2011), an environmental permit or a relevant exemption.</p> <p>Furthermore, details on Storage of Construction Plant and Materials can be found in Paragraph 5.4.61 in Chapter 5: Construction programme and Management of the Environmental Statement – Volume I (Document Ref. 6.2). Accordingly, the assessment of the Proposed Development is unchanged.</p> <p>In order to manage and monitor waste generated on the Site during construction, a Framework Site Waste Management Plan (SWMP) has also been developed as part of the Framework CEMP, which allows for waste</p>

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	<p>protected place on site to prevent waste, for example, from damage or vandalism [...].”</p> <p>Paragraph 5.15.15 states the SoS should be satisfied that:</p> <ul style="list-style-type: none"> • “any such waste will be properly managed, both on and off site. • the waste from the proposed facility can be dealt with appropriately by the waste infrastructure which is, or is likely to be, available. Such waste arisings should not have an adverse effect on the capacity of existing waste management facilities to deal with other waste arisings in the area. • adequate steps have been taken to minimise the volume of waste arisings, and of the volume of waste arisings sent for recovery or disposal, except where that is the best overall environmental outcome.” 	<p>streams to be estimated and monitored and goals set with regards to the waste produced. The SWMP will require that the contractor segregates waste streams on-site, prior to them being taken to a waste facility for recycling or disposal. All waste removal from the Site will be undertaken by licensed waste carriers and taken to permitted waste facilities.</p> <p>The final CEMP and SWMP is secured by a requirement within Schedule 2 of the draft DCO (Application Document Ref. 3.1).</p> <p>It is therefore considered that the Proposed Development is in conformity with EN-1.</p>
<p>Water quality and resources (EN-1, 5.16; EN-2, 2.4; and EN-4 2.21)</p>	<p>Paragraph 5.16.3 of EN-1 (Section 5.16) states that, where a Proposed Development is likely to have effects on water quality, water resources and physical characteristics of the water environment an assessment should be undertaken of the impacts of the Proposed Development.</p>	<p>Chapter 12 (Water Environment and Flood Risk) of ES Volume I (Application Document Ref. 6.2.12) provides an assessment of likely significant effects on the water environment and flood risk as a result of construction, operational and decommissioning phases of the Proposed Development. It considers the existing status of, and impacts of the Proposed Development on water quality, water resources and physical characteristics of</p>

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	<p>Paragraph 5.16.4 states that the applicant should make early contact with the relevant regulators, including the local authority, the Environment Agency and Marine Management Organisation, where appropriate, for relevant licensing and environmental permitting requirements.</p> <p>Paragraph 5.16.5 states that where possible, applicants are encouraged to manage surface water during construction by treating surface water runoff from exposed topsoil prior to discharging and to limit the discharge of suspended solids e.g. from car parks or other areas of hard standing, during operation.</p> <p>Paragraph 5.16.14 states that the SoS should be satisfied that Proposed Developments have regard to the River Basin Management Plans and meets the requirements of the Water Environment (Water Framework Directive) (England and Wales) Regulations 2017 (including regulation 19).</p> <p>Paragraph 5.16.9 states that the risk of impacts on the water environment can be reduced through careful design to facilitate adherence to good pollution control practice.</p> <p>EN-2 (paragraphs 2.4.8 - 2.4.10) notes that generating stations, in particular coal-fired stations, have very high-water demands, which means that</p>	<p>the water environment, taking into consideration climate change impacts.</p> <p>Relevant regulators including the Doncaster East Internal Drainage Board, Severn Trent Water, Isle of Axholme and North Nottinghamshire Water Level Management Board ('IoAaNNWLMB'), Environment Agency, Anglian Water and the Canal and Rivers Trust were contacted during statutory consultation. At scoping stage, Anglian Water, the Canal & River Trust, Environment Agency and the were all consulted.</p> <p>Chapter 12 (Water Environment and Flood Risk) of ES Volume I (Application Document Ref. 6.2.12) provides appropriate protective measures to address surface water run off both during construction and operation. Furthermore, the effects of flooding on important services and the wider community have been addressed in mitigation strategy as well as the Flood Emergency Response Plan.</p> <p>All residual effects during construction and operation of the Proposed Development have been identified as neutral to slight adverse (not significant), provided that the embedded mitigation measures set out in Chapter 12 are implemented.</p> <p>Requirements relating to surface water drainage and Foul water drainage in Schedule 2 of the draft DCO</p>

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GENERIC IMPACT	SUMMARY	ASSESSMENT
	<p>preferred site locations are likely to be coastal or alongside large rivers to extract sufficient water.</p> <p>EN-4, Section 2.21 deals with water quality and resources relating to gas supply pipelines. It notes (paragraph 2.21.37) that the construction of pipelines creates corridors of surface clearance and excavation that can potentially affect watercourses, aquifers, water abstraction and discharge points, areas prone to flooding and ecological receptors. Pipeline impacts could include:</p> <ul style="list-style-type: none"> • “inadequate or excessive drainage, • interference with groundwater flow pathways, mobilisation of contaminants already in the ground, the introduction of new pollutants, • flooding, • disturbance to water ecology, • pollution due to silt from construction and • disturbance to species and their habitats.” <p>Impacts during construction should be avoided as far as possible through route selection or mitigated if unavoidable and ground should be reinstated after construction.</p> <p>Mitigation measures (paragraph 2.22.10) to protect the water environment may include techniques for:</p>	<p>(Application Document Ref. 3.1) secure details of temporary surface water and drainage systems, including means of pollution control for the construction phase of the Proposed Development in accordance with the Construction Environment Management Plan (CEMP). The CEMP is secured by a requirement. A further requirement of Schedule 2 of the draft DCO (Application Document Ref. 3.1) secures details of a scheme to deal with the contamination of ground water, which is likely to cause significant harm to person or pollution of controlled waters or the environment.</p> <p>The Keadby 2 Power Station abstraction licence (MD/028/0083/014) was varied in 2022/2023 to include the abstraction required for the Keadby CCS Power Station project. As the Proposed Development is an alternative to Keadby CCS Power Station, with a lower cooling water demand, this abstraction licence is anticipated to be re-allocated to the Proposed Development.</p> <p>It is therefore considered that the Proposed Development is in conformity with EN-1, EN-2 and EN-4.</p>

GENERIC IMPACT	SUMMARY	ASSESSMENT
	<ul style="list-style-type: none"> • the avoidance of vulnerable groundwater areas or appropriate use of above ground pipeline facilities; • use of the highest specification pipework and best practice in the storage and handling of pollutants to prevent spillage; • careful storage of excavated material away from watercourses and facilities for the disposal of sewage and waste; • use of sustainable drainage systems; and • careful reinstatement of riverbanks and reed beds. 	

Appendix 5 : Assessment and Technology Specific Considerations

Generic Impact	Summary	Assessment
<p>Factors influencing site selection and design (EN-2, 2.2, EN-4 2.2)</p>	<p>Section 2.2 of both EN-2 and EN-4 outlines a similar number of factors influencing site selection and design.</p> <p>The choices which applicants make in selecting sites reflect their assessment of the risk that the Secretary of State, following the general points set out in section 4.1 of EN-1, will not grant consent in any given case. (EN-2 and EN-4 paragraphs 2.2.5).</p> <p>It is for applicants to decide what applications to bring forward and the government does not seek to direct applicants to particular sites for natural gas electricity generating stations (in respect of EN-2 (paragraphs 2.2.6)) and gas supply infrastructure and oil and gas pipelines (in respect of EN-4 (paragraphs 2.2.6)).</p>	<p>ES Volume 1 Chapter 6 (Consideration of Alternatives and Design Evolution) (Application Document Ref. 6.2.6) sets out the alternatives that have been considered and how the design of the Proposed Development has evolved.</p> <p>In this context, the consideration of alternatives and design evolution has been undertaken with the aim of developing a high-efficiency dispatchable power station to meet the identified national need for such facilities, while avoiding and/ or reducing adverse environmental effects (following the mitigation hierarchy of avoid, reduce and, if possible, remedy) and whilst also maximising its wider benefits, maintaining operational efficiency and cost-effectiveness, and considering other relevant matters, such as available land and planning policy.</p> <p>Site selection has been informed by the Applicant’s knowledge of CCGTs; design considerations in relation to cooling water supply source, electrical connection point and the location of construction laydown have evolved from the Keadby CCS DCO. Engineering work, surveys and technical studies and engagement with stakeholders during the pre-application stage for this application have been used to refine the design of the Site</p> <p>The Proposed Development site has been selected as opposed to other potentially available sites for the following reasons:</p> <ul style="list-style-type: none"> • the Site is suitably located to connect to the developing hydrogen supply network, which includes National Grid’s Project Union (a national hydrogen transmission network for the UK, connecting hydrogen production and storage to hydrogen consumers) and Northern Gas Networks’ proposed local hydrogen transmission network (East Coast Hydrogen project) • the Site has excellent links to existing infrastructure including electrical grid and gas (specifically the National Grid electricity and natural gas transmission networks); water (given proximity to both the Stainforth and Keadby Canal and River Trent) and transport (A18 and M180 as well as waterborne options) • The Site is located largely within the boundary of the existing Keadby Power Station site (and associated land within the ownership or control of the Applicant);

Generic Impact	Summary	Assessment
		<ul style="list-style-type: none"> the Main Site is a brownfield site, which is considered more appropriate to redevelop for large scale power generation than an alternative greenfield site, and has no existing major structures requiring demolition, treatment and removal; the location of the Main Site minimises interference with the Landscape and Creative Conservation Plan for Keadby 2 Power Station and specifically, the Habitat Management Areas secured via Conditions 31-34 inclusive of the Section 36 consent for Keadby 2 Power Station; the Main Site provides sufficient space to accommodate the required scale of a single high efficiency CCGT unit, without encroaching on the exclusion areas for the Keadby Wind Farm turbines to the north, the former Keadby Ash Tip to the west and the existing overhead lines to the south and east; and the Main Site is located in close proximity to the existing Keadby 1 and Keadby 2 Power Stations, providing opportunities for synergies and efficiencies for the Proposed Development, such as shared use of the existing cooling water discharge infrastructure and existing access routes.
<p>Factors influencing site selection and design (EN-5, Section 2.2)</p>	<p>Section 2.2 of EN-5 states that the SoS should bear in mind that the initiating and terminating points – or development zone – of new electricity networks infrastructure is not substantially within the control of the applicant.</p> <p>Siting is determined by:</p> <ul style="list-style-type: none"> the location of new generating stations or other infrastructure requiring connection to the network, and/or <p>system capacity and resilience requirements determined by the Electricity System Operator</p> <p>Paragraph 2.2.3 states that “These twin constraints, coupled with the government’s legislative commitment to net zero by 2050, strategic commitment to new interconnectors with neighbouring North Seas countries and an ambition of up to 50GW of offshore wind generation by 2030, means that very significant amounts of new electricity networks infrastructure is required, including in areas with comparatively little build-out to date.”</p> <p>Paragraph 2.2.4 confirms, “However, a strategic and holistic approach to onshore and offshore network planning, as set out in paragraphs 2.7 – 2.8, will identify the most efficient way of meeting decarbonisation</p>	<p>ES Volume 1 Chapter 6 (Consideration of Alternatives and Design Evolution) (Application Document Ref. 6.2.6) confirms that the Site has excellent links to the existing infrastructure including electrical grid.</p> <p>The electrical connection for the Proposed Development will be to the 400kV National Grid substation adjacent to the Main Site. The preferred route of the electrical connection cable has not yet been fixed so two options are retained in the Application allowing for connection into either the west side or the east side of the National Grid substation (Work No. 4). Both routes are represented pictorially on the Indicative Electrical Connection Plans (Application Document Ref. 2.7).</p> <p>The final route for the electrical connection will be determined when a connection agreement is reached. The Applicant will continue to engage with National Grid to enable development of this.</p>

Generic Impact	Summary	Assessment
	<p>targets and should reduce the overall amount of network infrastructure required.”</p> <p>Paragraph 2.2.5 states that, “Additionally, applicants retain control in managing the identification of routing and site selection between the identified initiating and terminating points or within the development zone.”</p> <p>Paragraph 2.2.6 confirms that, “Moreover, the locational constraints identified above do not, of course, exempt applicants from their duty to consider and balance the site-selection considerations set out below, much less the policies on good design and impact mitigation detailed in sections 2.4-2.9.”</p> <p>Paragraph 2.2.7 states that “The connection between the initiating and terminating points of a proposed new electricity line will often not be via the most direct route. Siting constraints, such as engineering, environmental or community considerations will be important in determining a feasible route.”</p> <p>Paragraph 2.2.9 confirms that “In particular, the applicant should consider such characteristics as the local topography, the possibilities for screening of the infrastructure and/or other options to mitigate any impacts. (See Section 2.10 below and Section 5.10 in EN-1.)”</p>	
<p>Climate change adaptation and resilience (Section 2.3 of EN-2 EN-4 and EN-5)</p>	<p>Section 2.3 of EN-2, EN-4 and EN-5 requires that a project assesses, within the ES and demonstrates how it would be resilient to climate change.</p>	<p>Chapter 18 of ES Volume I (Climate Change) (Application Document Ref. 6.2.12) considers the potential impacts and effects of the Proposed Development construction, operation (including maintenance) and decommissioning on the climate, as well as the impacts of climate change on the Proposed Development and surrounding environment. It is accompanied by</p> <p>Chapter 12 (Water Environment and Flood Risk) of ES Volume I (Application Document Ref. 6.2.12) provides an assessment of likely significant effects on the water environment and flood risk as a result of construction, operational and decommissioning phases of the Proposed Development. It considers the existing status of, and impacts of the Proposed Development on water quality, water resources and physical characteristics of the water environment, taking into consideration climate change impacts.</p> <p>It is accompanied by ES Volume II Appendix 18A: Climate Change Risk Assessment (‘CCRA’) (Application Document Ref. 6.3.25) which identifies and assesses the likelihood and potential consequence of potential climate change impacts on the Proposed Development and associated receptors, taking account of the</p>

Generic Impact	Summary	Assessment
		<p>adaption measures embedded into the design of the Proposed Development.</p> <p>Tables 18A.5, 18A.6 and 18A.7 presents the climate change risks associated with each phase of the Proposed Development; construction; operation and maintenance; and decommissioning. The tables also assign a significance rating based upon the likelihood of an impact occurring to the Proposed Development and the anticipated consequences. This includes consideration of embedded mitigation measures. The CCRA concludes that there are no significant climate risks.</p> <p>Mitigation measures embedded within the Proposed Development are contained in the Framework Construction Environmental Management Plan (Framework CEMP) (Application Document 7.4) where they relate to the construction phase. Mitigation measures related to water management and flood resilience are described in the ES Volume II Appendix 12A: Flood Risk Assessment ('CCRA') (Application Document Ref. 6.3.16)</p>
<p>Applicant assessment, Factors influencing site selection: Land Use (Section 2.4 of EN-2)</p>	<p>Paragraphs 2.4.1 – 2.4.3 address Land Use.</p> <p>Paragraph 2.4.1 confirms that “Natural gas generating stations have large land footprints and will therefore only be deliverable where the applicant is able to acquire a suitably-sized site. The site will also need to be big enough to conform to government policy on CCR, Decarbonisation Readiness (DR) and CCS, set out in Section 4.9 of EN-1.</p> <p>Paragraph 2.4.2 states that “Depending on the processes adopted, CCR, CCS and mitigation measures for emissions by natural gas generating stations may require storage and use of hazardous chemicals regulated under the Control of Major Accident Hazards (COMAH) Regulations 2015, which may have an impact on potential land-use in the vicinity. This in turn may affect the applicant’s choice of site.”</p> <p>Paragraph 2.4.3 explains that “Development of a CHP generating station may also have an effect on the size of site required and land-use. Details of land-use impacts are set out in Section 5.11 of EN-1.”</p>	<p>Refer to the response to ‘Factors influencing site selection and design (EN-2, 2.2, EN-4 2.2)’ above. ES Volume 1 Chapter 6 (Consideration of Alternatives and Design Evolution) (Application Document Ref. 6.2.6) sets out the alternatives that have been considered during the evolution of the Proposed Development and design process and the reasons why the Proposed Development was selected and why it is suitable.</p> <p>In accordance with the Carbon Capture Readiness (Electricity Generating Stations) Regulations 2013, even though the Proposed Development’s decarbonisation pathway is hydrogen-firing, land will need to be set aside within the Site for Carbon Capture Readiness (CCR). This requirement is expected to be replaced by Hydrogen Readiness Requirements when the Decarbonisation Readiness Guidance is adopted, but this is currently anticipated to be after the submission of the DCO application. Therefore, in the intermediate period, the Site includes land set aside to meet the CCR obligation (Work No. 11 on the Works Plans (Application Document Ref. 2.3)).</p>
<p>Applicant assessment, Technical Considerations:</p>	<p>Paragraph 2.4.18 explains that “Natural gas electricity generating stations connect into either the transmission or distribution networks. The technical feasibility of export of electricity from a generating station</p>	<p>The Proposed Development will be designed for the use of hydrogen as the fuel for the operation of the CCGT, but if hydrogen is not</p>

Generic Impact	Summary	Assessment
Network Connection (Section 2.4 of EN-2)	<p>is dependent on the capacity of the grid network to accept the likely electricity output together with the voltage and distance of the connection.”</p> <p>Paragraph 2.4.19 confirms that “Applicants will usually have assured themselves that a viable connection exists before submitting the development proposal to the Secretary of State and, where they have not done so, they take that commercial risk.”</p> <p>Paragraph 2.4.20 states that “Even if the precise route of a connection has not been identified, in accordance with Section 4.10 of EN-1 any application to the Secretary of State must include information on how the generating station is to be connected and whether there are any particular environmental issues likely to arise from that connection.”</p>	<p>available from the start of operation, the Proposed Development will start operation using natural gas as the fuel.</p> <p>A Natural Gas Connection Statement (Application Document Ref: 7.3) has been submitted which demonstrates that the proposed Natural Gas Connection and associated pipeline included within the Application Work No. 3 (inclusive of Work Nos. 3A and 3B), assessed as part of the associated EIA reported in the ES (Application Document Refs. 6.1-6.4) are feasible, that the necessary agreements are, or will be, secured, and appropriate powers are, or will be, secured and appropriate powers are included in the draft DCO (Application Document Ref. 3.1) to facilitate the delivery of the Natural Gas Connection.</p> <p>The indicative route of the natural gas connection is represented pictorially on the Indicative Natural Gas Supply Pipeline Connection and AGI Plans (Application Document Ref: 2.11).</p>
Consideration of good design for energy infrastructure (Section 2.4 of EN-4)	<p>Section 2.4 EN-4 addresses the consideration of good design for energy infrastructure.</p> <p>Paragraph 2.4.1 confirms that “The Planning Act 2008 requires the Secretary of State to have regard, in designating an NPS, to the desirability of good design.”</p> <p>Paragraph 2.4.2 explains that “Applicants should consider the criteria for good design set out in EN-1 Section 4.7 at an early stage when developing projects.”</p>	<p>The Proposed Development is consistent with the aims of this policy. The Design and Access Statement (Application Document Ref 5.6) sets out the regard had to design and access considerations in designing the Proposed Development. The document explains how the Site’s context, wider setting and planning policy has been taken into account. While flexibility has been sought in the design of the Proposed Development, the Applicant has defined design parameters upon which to base the EIA to ensure that the likely significant effects of the Proposed Development have been robustly assessed.</p> <p>The DAS notes that the immediate context for much of the Site is formed and dominated by the extensive industrial complex of the Keadby Power Station site, and therefore has been significantly altered by human activity and development and therefore not particularly sensitive to change. Notwithstanding, the final design of the Proposed Development is functional, reflecting its purpose and the context within which it will sit, and with the siting and layout of main buildings and structures set well within the plot and grouped together where feasible to consolidate the built form.</p> <p>A design evolution process has been set out in the Design and Access Statement (Application Document Ref. 5.6) and has minimised the use of greenfield land, and design mitigation is set out in the Landscaping and Biodiversity Management and Enhancement Plan (Application Document Ref. 5.10).</p> <p>Approval of the detailed design of the Proposed Development is secured by a requirement in Schedule 2 of the Draft DCO (Application Document Ref. 3.1).</p>

Generic Impact	Summary	Assessment
Pipeline safety (Section 2.21 of EN-4)	<p>Paragraph 2.21.9 states that “The principal legislation governing the safety of pipelines (the Pipelines Safety Regulations 199611) requires that pipelines are designed, constructed and operated so that the risks are as low as is reasonably practicable (ALARP).”</p> <p>Paragraph 2.21.10 explains that “The HSE enforces these Regulations, which place general duties on all pipeline operators and additional duties on the operators of major accident hazard pipelines.”</p> <p>Paragraph 2.21.11 confirms that “The additional duties require the pipeline operator to provide certain information to HSE at various stages in the lifecycle of a pipeline.”</p> <p>Paragraph 2.21.12 states that “In determining compliance, HSE expects pipeline operators to apply relevant good practice as a minimum.”</p> <p>Paragraph 2.21.13 explains that “In the pipeline industry there are well established standards, covering design, operation and maintenance of major accident hazard pipelines which can be used to demonstrate risks are ALARP.”</p> <p>Paragraph 2.21.14 sets out that “If a pipeline operator wishes to use other standards, recommendations, or guidance then this should be discussed with the HSE and may be acceptable to the HSE, provided that the pipeline operator can demonstrate that they achieve at least the equivalent levels of safety. A gap analysis should be undertaken to confirm this.”</p>	<p>The various pipelines will be manufactured and installed so as to fully comply with relevant legislation including the Pressure Equipment (Safety) Regulations 2016 (HM Government, 2016a) and the Pipelines Safety Regulations (PSR) (HM Government, 1996) and all other relevant standards in order to that risks are ALARP.</p>
Environmental and Biodiversity Net Gain (Section 2.5 of EN-5)	<p>Paragraph 2.5.1 explains that “When planning and evaluating the proposed development’s contribution to environmental and biodiversity net gain, it will be important – for both the applicant and the Secretary of State – to supplement the generic guidance set out in EN-1 (Section 4.6) with recognition that the linear nature of electricity networks infrastructure can allow for excellent opportunities to:</p> <ul style="list-style-type: none"> i. reconnect important habitats via green corridors, biodiversity stepping zones, and reestablishment of appropriate hedgerows; and/or ii. connect people to the environment, for instance via footpaths and cycleways constructed in tandem with environmental enhancements.” 	<p>A voluntary BNG assessment has been prepared to measure and quantify the impact of the Proposed Development on biodiversity and nature conservation and is contained in Appendix D of Outline LBMEP Report (Application Document Ref. 5.10) and supported by the Indicative Landscape and Biodiversity Plan (Application Document Ref. 2.18).</p> <p>While there is currently no planning policy or legal requirement to deliver a specific quantum of BNG (with demonstration of a quantifiable gain being sufficient), the assessment indicates that the increase in habitat, hedgerow and watercourse units is consistent with the 10% minimum BNG threshold to be mandated by the Environment Act 2021 for NSIP developments from May 2026.</p>
Electric and Magnetic Fields (EMFs) (Section 2.9 of EN-5)	<p>Paragraph 2.9.46 states that “All overhead power lines produce EMFs. These tend to be highest directly under a line and decrease to the sides at increasing distance. Although putting cables underground eliminates the electric field, they still produce magnetic fields, which are</p>	<p>ES Volume I Chapter 17: Population and Human Health (Application Document Ref. 6.2.17) considers the potential EMF effects associated with the 400kV connection on human health receptors including residential and recreational receptors. The Proposed</p>

Generic Impact	Summary	Assessment
	<p>highest directly above the cable. EMFs can have both direct and indirect effects on human health, aquatic and terrestrial organisms.”</p> <p>Paragraph 2.9.47 confirms that “The direct effects occur in terms of impacts on the central nervous system resulting in its normal functioning being affected. Indirect effects occur through electric charges building up on the surface of the body producing a microshock on contact with a grounded object, or vice versa, which, depending on the field strength and other exposure factors, can range from barely perceptible to being an annoyance or even painful.”</p> <p>Paragraph 2.9.48 explains that “To prevent these known effects, the International Commission on Non-Ionizing Radiation Protection (ICNIRP) developed health protection guidelines in 1998 for both public and occupational exposure. These are expressed in terms of the induced current density in affected tissues of the body, ‘basic restrictions’, and in terms of measurable ‘reference levels’ of electric field strength (for electric fields), and magnetic flux density (for magnetic fields). The relationship between the (measurable) electric field strength or magnetic flux density and induced current density in body tissues requires complex dosimetric modelling.”</p>	<p>Development’s design and impact avoidance measures are described in Section 17.6 and mitigation measures signposted in Section 17.8.</p> <p>The potential health effects of EMFs are to be mitigated through careful design, ensuring that the cable connection is laid at a suitable depth below ground level where necessary (including in areas outside the operational site in publicly accessible areas). This will be designed in line with indicative guidance from the Transmission and Distribution specialists, based on the National Grid Technical Specification for the Laying of High Voltage Cables (NG TS 3.05.07) standard for 400kV high-voltage cables.</p> <p>Due to the potential for the 400kV connection to be located partly within or alongside Chapel Lane, the Proposed Development has the potential to expose road users to EMF radiation. ES Volume I Chapter 17 considers the potential effects on Population and human health arising EMF exposure. It is assumed that whilst the 400kV connection is under construction, there will be no EMFs produced by the Proposed Development. The likely effect on Population and Human Health arising from potential exposure to EMF during the construction phase is assessed to be negligible and therefore not significant.</p> <p>Once, the 400kV connection is operational, the potential health impacts of EMFs would be mitigated by the embedded design and impact avoidance measures with regards to its location which are described in the preceding paragraph. As a result the magnitude of the impact is considered low and the overall effect on human health during the operational phase is assessed to be minor adverse and not significant.</p>
<p>Sulphur Hexafluoride (SF6) (Sections 2.9 and 2.10 of EN-5)</p>	<p>Paragraph 2.9.61 states that “Applicants should at the design phase of the process consider carefully whether the proposed development could be reconceived to avoid the use of SF6-reliant assets.”</p> <p>Paragraph 2.9.62 confirms that “Where the development cannot be so conceived, the applicant must provide evidence of their reasoning on this point. Such evidence will include, for instance, an explanation of the alternatives considered, and a case why these alternatives are technically infeasible or require bespoke components that are grossly disproportionate in terms of cost.”</p> <p>Paragraph 2.10.14 states that “The climate-warming potential of SF6 is such that applicants should, as a rule, avoid the use of SF6 in new developments.”</p> <p>Paragraph 2.10.15 sets out that “Where no proven SF6-free alternative is commercially available, and where the cost of procuring a bespoke alternative is grossly disproportionate, the continued use of SF6 is</p>	<p>The Applicant intends to contract, construct and install electrical components that avoid SF6 where technological developments allow.</p> <p>The presence of SF6 will be dictated by the breaking capability of the apparatus. It is expected that the Generator Circuit Breakers will contain SF6 due to their unique properties and the 400kV circuit breaker(s) are also expected to contain SF6 because there are no commercially available SF6 apparatus which are currently available.</p>

Generic Impact	Summary	Assessment
	<p>acceptable, provided that emissions monitoring and control measures compliant with the F-gas Regulation and/or its successors are in place.”</p>	

Appendix 6 : Compliance with NPPF Policies

NPPF Ref.	Policy Summary	Assessment
<p>Chapter 6 Building a strong, competitive economy</p>	<p>Confirms that the Government is committed to securing economic growth and productivity and allowing each area to build on its strengths, counter any weaknesses and address the challenges of the future. Paragraphs 85 and 86 make it clear that planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt and seek to address potential barriers to investment, including amongst other matters, inadequate infrastructure.</p>	<p>The Proposed Development would support sustainable economic growth through the provision of electricity generating capacity, for which there is a confirmed need, enhancing the security and diversity of UK energy supplies. The provision of secure energy supplies that are resilient to potential supply disruptions is critical to economic growth.</p> <p>Chapter 16 ‘Socio-Economics’ of the ES Volume I (Application Document Ref. 6.2.16) addresses the potential effects of the construction, operation (including maintenance) and decommissioning of the Proposed Development on employment, local businesses and the local population.</p> <p>Based on the gross construction worker requirements for construction of the Proposed Development and the additionality factors outlined in Chapter 16, 1,076 net construction jobs would be generated. It is estimated that the total net employment for the Proposed Development is up to 58 employees.</p> <p>It is therefore considered that the Proposed Development is in conformity with the NPPF.</p>

<p>Chapter 9</p> <p>Promoting sustainable transport</p>	<p>Aimed at facilitating more sustainable transport choices so as to contribute to wider sustainability and public health objectives.</p> <p>Paragraph 115 states that in assessing sites for applications it should be ensured that :</p> <ul style="list-style-type: none"> (a) sustainable transport modes are prioritised taking account of the vision for the site, the type of development and its location; (b) safe and suitable access can be achieved for all users; [...] and (c) any significant impacts on highway safety can be mitigated to an acceptable degree. <p>Paragraph 118 states that all developments that generate</p>	<p>The main potential impact of the Proposed Development on transport will be during the construction phase, during which it is noteworthy that water freight is proposed for bringing AIL onto Site where possible. The assessment of traffic and transport in the ES is based on a worst-case scenario but demonstrates traffic and transport effects during construction will be acceptable and will not adversely impact on the highway network. The transport effects during operation would be limited. The Applicant has submitted a framework CTMP (Application Document Ref. 7.5) and CWTP (Application Document Ref. 7.6) and these include measures to manage and minimise transport impacts during construction. The Final CTMP and CWTP will be secured by requirements in Schedule 2 in the draft DCO (Application Document Ref. 3.1) respectively.</p> <p>It is therefore considered that, with appropriate transport management, the Proposed Development is in conformity with the NPPF.</p>
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	<p>significant amounts of movement should be supported by a vision-led transport statement or assessment so that the likely impacts can be assessed and monitored.</p>	
<p>Chapter 11 Making effective use of land</p>	<p>Aimed at promoting the effective use of land, including by (paragraph 125c) giving substantial weight to the use of suitable brownfield land.</p>	<p>The Site has been selected by the Applicant for the Proposed Development, as opposed to other potentially available sites, for the following reasons:</p> <ul style="list-style-type: none"> • absence of major structures requiring demolition, treatment and removal on the Proposed Development Site; • use of the Proposed Development Site minimises interference with the Landscape and Creative Conservation Plan for Keadby 2 Power Station. It also avoids areas of highest biodiversity value within the wider Keadby Power Station site; • sufficient space is available within the Proposed Development Site to accommodate the power generation equipment, without encroaching on the exclusion areas for the Keadby Wind Farm turbines to the north and the existing overhead lines to the south and east; • the Proposed Development Site enables connections to be developed to existing electrical, gas and, in the future, hydrogen supply infrastructure; and • adequate supplies of cooling water can be provided via the nearby Stainforth and Keadby Canal, whilst existing infrastructure for

		<p>discharge of the treated effluent into the River Trent can also be utilised.</p> <p>A more detailed description of the Site is provided in ES Volume I Chapter 3 (Description of the Site) (Application Document Ref. 6.2.3) and information on Alternative Sites is provided in Chapter 6 (Consideration of Alternatives) (Application Document Ref. 6.2.6).</p> <p>It is therefore considered that the Proposed Development is in conformity with the NPPF.</p>
<p>Chapter 12 Achieving well-designed places</p>	<p>Deals with the matter of design in the built environment. Paragraph 131 confirms that good design is a key aspect of sustainable development. Paragraph 137 goes on to state that design quality should be considered throughout the evolution of individual proposals and applicants should work closely with those affected by their proposals.</p>	<p>The Design and Access Statement (Application Document Ref. 5.6) sets out how the Applicant has had regard to design and access considerations in designing the Proposed Development. The document explains how the Site’s context, wider setting and planning policy has been taken into account in the design.</p> <p>While flexibility has been sought in the design, the Applicant has defined design parameters upon which to base the EIA to ensure that the likely significant effects of the Proposed Development have been robustly assessed. The Applicant has also included appropriate articles and requirements within the DCO to ensure that the detailed design of the Proposed Development is controlled and secured.</p>

		<p>The final design is functional, reflecting its purpose and the context within which it will sit. In terms of siting and layout, the main buildings and structures are set well within the plot and have been grouped together where feasible from a technical and safety perspective to consolidate the built form.</p> <p>The design of the Proposed Development will be secured via requirements relating to detailed design and landscaping management in Schedule 2 of the draft DCO (Application Document Ref. 3.1).</p> <p>It is therefore considered that the Proposed Development is in conformity with the design chapter of the NPPF.</p>
<p>Chapter 14 Meeting the challenge of climate change, flooding and coastal change</p>	<p>Focuses upon adapting to and mitigating the effects of climate change.</p> <p>Paragraph 161 highlights that the planning system should support the transition to net zero by 2050 and to help shape places in ways that contribute to radical reductions in greenhouse gas</p>	<p>The Proposed Development incorporates a number of measures within its design to ensure that it will be resilient in terms of the effects of climate change as well as contributing to mitigating those effects. For example, as set out in ES Volume I Chapter 12 (Water Environment and Flood Risk) (Application Document Ref. 6.2.12), the Proposed Development will not be at risk of flooding nor increase the risk of flooding elsewhere. Furthermore, ES Volume I Chapter 18 (Climate Change and Sustainability) (Application Document Ref. 6.2.18) confirms that the Proposed Development will not result in significant climate change effects.</p>

	<p>emissions, minimising vulnerability and improving resilience.</p> <p>Paragraph 170 warns that inappropriate development in areas at risk of flooding should be avoided but where it is necessary the development should be made safe for its lifetime without increasing flood risk elsewhere.</p> <p>The Sequential Test should be applied to development known to be at risk of flooding now or in the future (paragraph 175).</p> <p>If it is not possible for development to be located in zones with a lower risk of flooding the exception test may have to be applied (paragraph 177).</p>	<p>Regarding flooding, NPPF paragraph 175 requires application of the Sequential Test to ensure that alternative sites at lower risk of flooding have been considered. A site selection exercise was undertaken for the Proposed Development. None of the sites considered are at lower risk of flooding than the Proposed Development Site. It follows that there are no sequentially superior sites that could reasonably accommodate the Proposed Development, and the Sequential Test is passed (see section 5.3 of this Planning Statement).</p> <p>Regarding the need to avoid increasing flood risk elsewhere, the Proposed Development will lead to an increase in impermeable surfaces on the Site and a subsequent increase in runoff. The outline drainage strategy proposes that runoff will be attenuated to greenfield runoff rates discharging to the IDB drainage system. Significant changes in flows and flood risk from the receiving watercourses is therefore unlikely.</p> <p>There is potential for exceedance of the drainage system which may lead to uncontrolled runoff leaving the Site. This may occur when high water levels in the receiving watercourses prevent discharge, due to blockage or failure, or during periods of flood when the Site and drainage system is inundated. Considering the current flow volumes in the drainage network the additional runoff from the Site is unlikely to lead to any significant increase in flood risk from the wider network. The volume is negligible compared with the tidal flood volumes in the area. For more information see ES Volume II, Appendix 12A (Application Document Ref. 6.3.16).</p>
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		<p>The Exception Test has been applied and this Planning Statement (section 5.3) has shown that the Proposed Development complies with both of the test’s requirements: it will provide sustainability benefits to the community that outweigh the flood risk and it will be safe for its lifetime.</p>
<p>Chapter 15 Conserving and enhancing the natural environment</p>	<p>Aimed at protecting and enhancing valued landscapes, recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital, minimising impacts on and where possible providing net gains for biodiversity and preventing new and existing development from contributing to, being put at risk from or being adversely affected by unacceptable levels of soil, air, water or noise pollution and land instability.</p>	<p>The Environmental Statement Volume I (Application Document Ref. 6.2) confirms that the Proposed Development will not result in unacceptable impacts on the natural environment, covering topics including air quality, biodiversity and nature conservation, geology, hydrogeology and land contamination, and landscape and visual amenity. Neither would it result in significant effects upon the health or amenity of people living within the locality of the Site.</p> <p>In addition, a standalone Landscape and Biodiversity Management and Enhancement Plan (LBMEP) is provided as Application Document Ref. 5.10 of the DCO Application. This sets out biodiversity enhancement proposals and the habitat management and monitoring proposed to deliver these. It also confirms that the proposed enhancement measures are suitable to achieve no net loss and a gain in biodiversity within the Proposed Development Site. It is proposed that submission and approval of the final LBMEP will be secured by a Requirement of the draft DCO (Application Document Ref. 3.1).</p> <p>The biodiversity enhancement measures proposed comprise:</p>

		<ul style="list-style-type: none"> • creation of flower-rich native grassland; • new species-rich native hedgerow plantings; • new scrub and woodland plantings comprising a diverse mix of native woody species; • enhancement of field drains for water voles and other aquatic biodiversity; • enhancement of the riparian habitats of the Hatfield Waste Drain and the South Soak Drain for aquatic and/or riparian biodiversity; and • installation of nest boxes for barn owl and other birds, habitat creation for willow tit, and installation of roosting boxes for bats. <p>It is therefore considered that the Proposed Development is in conformity with the NPPF.</p>
<p>Chapter 16 Conserving and enhancing the historic environment</p>	<p>Seeks to conserve heritage assets so that they can be enjoyed for their contribution to the quality of life of existing and future generations (paragraph 202).</p> <p>Paragraph 207 states that where a development proposal includes, or has potential to</p>	<p>Below Ground Archaeological Remains</p> <p>The magnitude of impact on organic (peaty) deposits [MLS27193], the earlier buried land surfaces [MLS27196] and potential palaeoenvironmental remains as a consequence of the Proposed Development has been assessed as medium, resulting in a moderate adverse effect, which in the absence of mitigation would be significant.</p> <p>The mitigation measures described in Section 15.8 comprising a programme of geoarchaeological analysis and reporting; and archaeological monitoring during construction, would not minimise the physical impact to individual</p>

	<p>include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.</p>	<p>heritage assets, as the archaeological evidence would still be removed, but would compensate for their loss by preserving them by record. This would reduce the magnitude of impact on individual assets, resulting in a residual minor adverse effect, which is not significant.</p> <p>Built Heritage</p> <p>Due to the scale of the Proposed Development, it is envisaged that opportunities to provide effective landscape screening will be limited. Therefore, the residual effects of the Proposed Development in relation to impacts resulting from change to the setting of designated and non-designated heritage assets will be the same as those reported under construction phase effects for the majority of assets. These effects are not significant.</p> <p>Detailed assessment of impacts upon the historic environment are provided by ES Chapter 15 Cultural Heritage (Application Document Ref. 6.2.15).</p>
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Appendix 7 : Statutory Development Plan Policies

Policy	Policy Document	Policy Text	Assessment
Spatial Objective 1 – An Area Wide Renaissance	Core Strategy	To deliver area wide renaissance in North Lincolnshire which creates a step change in the area’s role both regionally and nationally and creates a high quality of life for the area’s residents, with Scunthorpe providing the sub-regional focus for development supported by the market towns of Barton upon Humber, Brigg, Crowle, Epworth, Kirton in Lindsey and Winterton.	<p>The Proposed Development will have major beneficial socioeconomic effects, providing construction employment and directly creating jobs in close proximity to Scunthorpe, as set out in Environmental Statement Volume I Chapter 16 (Socio-economics) (Application Document Ref. 6.2.16).</p> <p>The Proposed Development Proposed Development would act as a catalyst for the creation of a ‘strong and enduring UK hydrogen economy’ (EN-1 paragraph 3.3.49) as it would establish a hydrogen-ready end-user for a future hydrogen supply chain, capable of creating the step change that Spatial Objective 1 envisages. The Proposed Development would have a beneficial effect economically at a local and regional level arising from the employment creation during the construction phase.</p>

Policy	Policy Document	Policy Text	Assessment
Spatial Objective 4 – Creating Greater Economic Success	Core Strategy	To create a strong, competitive and diverse economy by encouraging business growth and employment opportunities supported by the delivery of strategic employment sites and improvement of the range and level of skills by developing a higher education sector.	The Proposed Development is consistent with creating a strong, competitive and diverse economy by providing both construction and operational employment in an area with an established history of energy generation and the potential for clustering of high skilled jobs, as set out in Environmental Statement Volume I Chapter 16 (Socio-economics) (Application Document Ref. 6.2.16).
Spatial Objective 6 – Protecting and Enhancing The World Class Environment	Core Strategy	To conserve and enhance our world class environments of the Humber Estuary and Crowle Moors and improve our other natural, historic and built landscapes as well as guiding changes in a way which reduces and takes proper account of environmental impact, climate change and sea level rise.	As set out in various chapters of the Environmental Statement Volume I (Application Document Ref. 6.2.0) and the Landscaping and Biodiversity Management and Enhancement Plan Report (Application Document Ref. 5.10), secured via a requirement in the Draft DCO, the Proposed Development will conserve and enhance the local natural, historic and built landscapes, mitigate and adapt to the effects of climate change, and make positive steps toward tackling climate change.
Spatial Objective 7 – Efficient Use and	Core Strategy	To ensure the efficient use of resources, maximising recycling of minerals and	Various chapters of Environmental Statement Volume I (Application

Policy	Policy Document	Policy Text	Assessment
Management of Resources		waste products, minimising pollution, maintaining and improving air, soil and water quality, and employing sustainable building practices in new development.	<p>Document Ref 6.2.20) set out the environmental impacts of the Proposed Development and how pollution is minimised and how resources are to be used efficiently.</p> <p>The Proposed Development will operate highly efficiently in terms of resource use and will support the UK to fulfil its net zero policy and transition away from fossil fuels, as hydrogen has zero emissions at the point of combustion. By adding a reliable source of low-carbon electricity, the Proposed Development will facilitate the decarbonisation of the UK grid.</p> <p>Further to this, the Proposed Development will be operated in accordance with an Environmental Permit.</p> <p>In terms of construction resource a range of measures including a site waste management plan will apply as part of the Construction Environmental Management Plan, submission and approval of which is secured by a DCO</p>

Policy	Policy Document	Policy Text	Assessment
			<p>requirement. In addition the Proposed Development is largely located on brownfield land and makes extensive use of existing infrastructure such as the existing electricity grid, gas supply and cooling water supply infrastructure, and existing tracks accessing the A18 and Chapel Lane. The Proposed Development will therefore minimise resource use by utilising existing infrastructure and utilising brownfield land, rather than having the land restored only to be developed once more for the same facility</p>
<p>Spatial Objective 10 – Creating A Quality Environment</p>	<p>Core Strategy</p>	<p>To transform North Lincolnshire’s image by ensuring that all new development exhibits a high standard of design and architectural quality that respects and enhances the distinctive landscapes and townscapes of North Lincolnshire’s towns and villages.</p>	<p>The Proposed Development is consistent with the aims of this policy. The Design and Access Statement (Application Document Ref 5.6) sets out the regard had to design and access considerations in designing the Proposed Development. The document explains how the Site’s context, wider setting and planning policy has been taken into account. While flexibility has been sought in the design of the Proposed Development, the Applicant has defined design parameters upon which to base the EIA to ensure that the</p>

Policy	Policy Document	Policy Text	Assessment
			<p>likely significant effects of the Proposed Development have been robustly assessed. The DAS notes that the immediate context for much of the Site is formed and dominated by the extensive industrial complex of the Keadby Power Station site, and therefore has been significantly altered by human activity and development and therefore not particularly sensitive to change. Notwithstanding, the final design of the Proposed Development is functional, reflecting its purpose and the context within which it will sit, and with the siting and layout of main buildings and structures set well within the plot and grouped together where feasible to consolidate the built form. A design evolution process has been set out in the Design and Access Statement (Application Document Ref. 5.6) and has minimised the use of greenfield land, and design mitigation is set out in the Landscaping and Biodiversity Management and Enhancement Plan (Application Document Ref. 5.10). The design of the Proposed Development is secured by Requirements in Schedule 2</p>

Policy	Policy Document	Policy Text	Assessment
			of the Draft DCO (Application Document Ref. 3.1). Appropriate controls have been included, notably the maximum dimensions of larger structures, and the gatehouse adjoining the A18, being controlled via Schedule 11 of the Draft DCO (Application Document Ref. 3.1).
CS1 – Spatial Strategy for North Lincolnshire	Core Strategy	<p>The spatial vision and the future development requirements will be delivered through the spatial strategy for North Lincolnshire as outlined below and on the key diagram.</p> <p>The spatial strategy will focus on:</p> <ul style="list-style-type: none"> (a) Delivering an urban renaissance in Scunthorpe and supporting its role as a major subregional town. <ul style="list-style-type: none"> • Scunthorpe will be the focus for the majority of new development and growth, including housing, employment, retail, sustainable transport links, and higher order services and facilities to serve North Lincolnshire. 	The Proposed Development is consistent with the spatial strategy as it constitutes a form of economic development at an existing established employment site, it would be unsuitable within the development boundaries of North Lincolnshire’s towns, and will be located largely on previously used land and making use of existing structures and infrastructure, consistent with the spatial strategy policy on rural development. It is located in an area already characterised by substantial power infrastructure including overhead lines, wind turbines and two power stations, therefore is not out of keeping with local character. Appropriate controls have been included, notably the maximum dimensions of larger

Policy	Policy Document	Policy Text	Assessment
		<p>[...]</p> <ul style="list-style-type: none"> • Opportunities for economic development will be provided within existing established employment locations as well as on additional sites. (...) <p>[...]</p> <ul style="list-style-type: none"> • Small and medium scale employment opportunities will be encouraged to meet the need to provide local jobs. The retention of existing local employment sites will be supported and where appropriate additional land will be allocated. Around 10 hectares of employment land will be provided in the market towns, with the majority being focussed in Barton upon Humber and Brigg. <p>[...]</p> <p>(c) Supporting thriving rural communities and a vibrant countryside through the protection and enhancement of local services, creating opportunities for rural economic diversification and the promotion of tourism.</p> <ul style="list-style-type: none"> • Rural settlements will be supported as thriving sustainable 	<p>structures, and the gatehouse adjoining the A18, being controlled via Schedule 11 of the Draft DCO (Application Document Ref. 3.1). Design mitigation is set out in the Landscaping and Biodiversity Management and Enhancement Plan (Application Document Ref. 5.11) which are secured by Requirements in Schedule 2 of the Draft DCO (Application Document Ref. 3.1). The Proposed Development will have major beneficial socio-economic effects to the local area, as set out in ES Volume I Chapter 16 (Socio-economics) (Application Document Ref. 6.2.16).</p>

Policy	Policy Document	Policy Text	Assessment
		<p>communities, with a strong focus on retaining and enhancing existing local services to meet local needs. Development will be limited and should take into account levels of local service provision, infrastructure capacity and accessibility. Any development that takes place should be in keeping with the character and nature of the settlement.</p> <ul style="list-style-type: none"> In the countryside, support will be given to development that promotes rural economic diversification and small-scale employment opportunities, particularly on previously used land or in existing rural buildings. Tourism development will also be supported, in particular the development of green tourism making the most of the area's important natural and built environments. <p>...]</p> <ul style="list-style-type: none"> North Lincolnshire's townscapes and historic landscapes will also 	

Policy	Policy Document	Policy Text	Assessment
		<p>be protected and enhanced and high quality design encouraged. In particular, the nationally significant historic landscapes of the Isle of Axholme and Crowle Moors will be conserved and their potential as a tourist and educational resource realised. The character and landscape setting of the area's historic market towns will be safeguarded (especially Barton upon Humber, Crowle and Epworth) and the rich archaeological heritage of North Lincolnshire will be preserved and enhanced. The value of regionally and locally important sites will be enhanced and opportunities to improve green infrastructure will be included in all new development.</p> <p>All future growth regardless of location should contribute to sustainable development in particular in respect of those criteria set out in policy CS2 as well as the other policies of the plan. All change will be managed in an</p>	

Policy	Policy Document	Policy Text	Assessment
		<p>environmentally sustainable way by avoiding/minimising or mitigating development pressure on the area’s natural and built environment, its existing utilities and associated infrastructure and areas at risk of flooding. Where development unavoidably has an environmental impact adequate mitigation measures should be used for the development to be acceptable.</p>	
<p>CS2 – Delivering More Sustainable Development</p>	<p>Core Strategy</p>	<p>In supporting the delivery of the spatial strategy set out in policy CS1, as well as determining how future development needs will be met in North Lincolnshire, a sequential approach will be adopted. Development should be focused on: Previously developed land and buildings within the Scunthorpe urban area, followed by other suitable infill opportunities within the town, then by appropriate greenfield urban extensions Previously developed land and buildings within the defined development limits of North Lincolnshire’s Market Towns, followed by other suitable infill opportunities then appropriate small scale greenfield extensions to meet identified local needs</p>	<p>The Proposed Development, being power generation, would be unsuitable within the development boundaries of Scunthorpe or one of North Lincolnshire’s market towns. All land required for the Proposed Development has been carefully chosen for operational and technical reasons. The Proposed Development also makes appropriate use of previously developed land and existing infrastructure such as existing electricity grid, gas supply and cooling water supply infrastructure, and existing tracks accessing the A18 and Chapel Lane</p> <p>Further to this, the Design and Access Statement (Application Document Ref.</p>

Policy	Policy Document	Policy Text	Assessment
		<p>Small scale developments within the defined development limits of rural settlements to meet identified local needs.</p> <p>Any development that takes place outside the defined development limits of settlements or in rural settlements in the countryside will be restricted. Only development which is essential to the functioning of the countryside will be allowed to take place. This might include uses such as that related to agriculture, forestry or other uses which require a countryside location or which will contribute to the sustainable development of the tourist industry.</p> <p>A ‘sequential approach’ will also be applied to ensure that development is, where possible, directed to those areas that have the lowest probability of flooding, taking account the vulnerability of the type of development proposed, its contribution to creating sustainable communities and achieving the sustainable development objectives of the plan. Where development does take place in the flood plain, mitigation</p>	<p>5.6) includes design principles and explains how the use of greenfield and agricultural land for temporary construction purposes was minimised through a selection process that maximised the use of brownfield land. A Soil Resources Survey will form part of the final CEMP, as secured by a Requirement of Schedule 2 of the draft DCO (Application Document Ref. 3.1)</p> <p>Regarding the safety of development within the flood plain, ES Volume II Appendix 12A: Flood Risk Assessment (Application Document Ref. 6.3.16) demonstrates that the Proposed Development would be safe and not result in significant effects in terms of flooding. The EA has reviewed the Flood Risk Assessment undertaken by the Applicant at various stages pre application.</p>

Policy	Policy Document	Policy Text	Assessment
		<p>measures should be applied to ensure that the development is safe.</p> <p>All future development in North Lincolnshire will be required to contribute towards achieving sustainable development. Proposals should comply with the overall spatial strategy together with the following sustainable development principles:</p> <ul style="list-style-type: none"> • Be located to minimise the need to travel and to encourage any journeys that remain necessary to be possible by walking, cycling and public transport. It should be compliant with public transport accessibility criteria as set out in the Regional Spatial Strategy • Be located where it can make the best use of existing transport infrastructure and capacity, as well as taking account of capacity constraints and deliverable transport improvements particularly in relation to junctions on the Strategic Road Network 	

Policy	Policy Document	Policy Text	Assessment
		<ul style="list-style-type: none"> • Where large freight movements are involved the use of rail and water transport should be maximised • Contribute towards to the creation of locally distinctive, sustainable, inclusive, healthy and vibrant communities • Contribute to achieving sustainable economic development to support a competitive business and industrial sector • Ensure that everyone has access to health, education, jobs, shops, leisure and other community and cultural facilities that they need for their daily lives • Ensure the appropriate provision of services, facilities and infrastructure to meet the needs of the development, but where appropriate it is to be recognised that a phased approach may not be required on small scale development proposals. • To be constructed and operated using a minimum amount of non- 	

Policy	Policy Document	Policy Text	Assessment
		<p>renewable resources including increasing the use of renewable energy in construction and operation</p> <ul style="list-style-type: none"> • Take account of local environmental capacity and to improve air, water and soil quality and minimise the risk and hazards associated with flooding, and • Be designed to a high standard, consistent with policy CS5, and use sustainable construction and design techniques. <p>All change will be managed in an environmentally sustainable way by avoiding/minimising or mitigating development pressure on the area's natural and built environment, its existing utilities and associated infrastructure and areas at risk of flooding. Environmental impacts to or from development that cannot be avoided should be adequately mitigated for it to be acceptable.</p>	
CS3 – Development Limits	Core Strategy	Development limits will be applied to the Scunthorpe urban area, the Market Towns and Rural Settlements. They will	The Proposed Development, being power generation, would be unsuitable within the development boundaries of Scunthorpe or one of North

Policy	Policy Document	Policy Text	Assessment
		<p>not be applied to rural settlements in the countryside.</p> <p>In applying development limits the following considerations will be taken into account:</p> <ul style="list-style-type: none"> Existing development patterns - the development limit will be drawn around the main built up area of the settlement. Scattered, sporadic or dispersed development or buildings separated from the main body of the settlement by areas of undeveloped land, roads or industrial areas will not be included. Where possible, limits should follow clearly defined features or constraints such as roads. Capacity - the ability of the settlement to accommodate future development based on existing and proposed infrastructure, on its access to facilities and services and levels of public transport. This also includes the availability of previously developed land. 	<p>Lincolnshire’s market towns. All land required for the Proposed Development has been carefully chosen for operational and technical reasons. The Proposed Development would be located at an existing established employment site in an area characterised by power generation and transmission infrastructure including overhead lines and wind turbines. The Proposed Development also makes appropriate use of previously developed land and existing infrastructure existing electricity grid, gas supply and cooling water supply infrastructure, and existing tracks accessing the A18 and Chapel Lane.</p>

Policy	Policy Document	Policy Text	Assessment
		<ul style="list-style-type: none"> • Existing planning consents/development - land with planning consent for residential development or community facilities where development has been implemented. • Character - the limit will be drawn to reflect the need to protect and enhance settlement character. This means protecting areas of open space or land with the characteristics of open countryside within and adjacent to settlements by not including them within development limits. Large rear gardens or paddocks stretching well out the villages built form will also be excluded. <p>Development outside these defined boundaries will be restricted to that which is essential to the functioning of the countryside. This will include uses such as that related to agriculture, forestry or other uses which require a countryside location or that which will contribute to the sustainable development of the tourist industry.</p>	

Policy	Policy Document	Policy Text	Assessment
		<p>The extent of the development limits will be defined in the Housing & Employment Land Allocations Development Plan Documents and shown on the accompanying Proposals Map and settlement insets.</p>	
<p>CS5 – Delivering Quality Design in North Lincolnshire</p>	<ul style="list-style-type: none"> Core Strategy 	<p>All new development in North Lincolnshire should be well designed and appropriate for their context. It should contribute to creating a sense of place. The council will encourage contemporary design, provided that it is appropriate for its location and is informed by its surrounding context. Design which is inappropriate to the local area or fails to maximise opportunities for improving the character and quality of the area will not be acceptable.</p> <p>New development in North Lincolnshire should:</p> <ul style="list-style-type: none"> Contribute towards creating a positive and strong identity for North Lincolnshire by enhancing and promoting the image of the area through the creation of high 	<p>The Proposed Development is well designed for the scale of infrastructure required, and is appropriate for its context, which has an established presence of power generation and transmission development. The design process, including how the design was informed by its surrounding context, is set out in the Design and Access Statement (Application Document Ref. 5.6). Appendix 1 of the Design and Access Statement comprises a Design Principles Statement, a requirement in Schedule 2 of the Draft DCO (Application Document Ref. 3.1) which secured the carrying out of specific works Nos in accordance with the Design Principles Statement. The mitigations set out in the Landscaping and Biodiversity Management and Enhancement Plan (Application</p>

Policy	Policy Document	Policy Text	Assessment
		<p>quality townscapes and streetscapes.</p> <ul style="list-style-type: none"> • Ensure it takes account of the existing built heritage from the earliest stages in the design process, in particular terms of scale, density, layout and access. • Incorporate the principles of sustainable development throughout the whole design process. This will include site layout, minimising energy consumption, maximising use of on-site renewable forms of energy whilst mitigating against the impacts of climate change; for instance flood risk. • Create safe and secure environments, which reduce the opportunities for crime and increase the sense of security for local residents through the use of Secured by Design guidance. • Consider the relationship between any buildings and the spaces around them, and how they interact with each other as well as the surrounding area. The function 	<p>Document Ref. 5.10) and Construction Traffic Management Plan (Application Document Ref. 7.5) are also secured via requirements in the Draft DCO. Operational staffing related traffic generation will be limited and a dedicated new permanent access route to the A18 is provided (Work Nos. 8).).</p>

Policy	Policy Document	Policy Text	Assessment
		<p>of buildings should also be considered in terms of its appropriateness for the context in which it is located.</p> <ul style="list-style-type: none"> • Create attractive, accessible and easily distinguished public and private spaces that complement the built form. • Support sustainable living and ensure that a mix of uses, which complement one another are incorporated. • Provide flexibility in that new and existing buildings and spaces are able to respond to future social, technological, environmental and economic needs. • Be easily accessible to all users via recognisable routes, interchanges and landmarks that are suitably connected to public transport links, community facilities and services and individual communities and neighbourhoods in North Lincolnshire. Buildings and spaces should be accessible by all sections of the community, 	

Policy	Policy Document	Policy Text	Assessment
		<p>and ensure that the principles of inclusive design are reflected.</p> <ul style="list-style-type: none"> • Incorporate appropriate landscaping and planting which enhances biodiversity or geological features whilst contributing to the creation of a network of linked greenspaces across the area. Tree planting and landscaping schemes can also assist in minimising the impacts of carbon emissions upon the environment. • Integrate car parking provision within the existing public realm and other pedestrian and cycle routes. 	
CS6 – Historic Environment	Core Strategy	<p>The council will promote the effective management of North Lincolnshire’s historic assets through:</p> <ul style="list-style-type: none"> • Safeguarding the nationally significant medieval landscapes of the Isle of Axholme (notably the open strip fields and turbaries) and supporting initiatives which seek to realise the potential of these areas as a tourist, educational and environmental resource. 	<p>The Proposed Development is consistent with promoting effective management of North Lincolnshire’s historic assets. As set out in ES Volume I Chapter 15 (Cultural Heritage) (Application Document Ref. 6.2.15) no significant effects on heritage assets are likely. Furthermore, impacts on below ground assets will be controlled by a programme of geoarchaeological analysis and reporting; and archaeological monitoring during</p>

Policy	Policy Document	Policy Text	Assessment
		<ul style="list-style-type: none"> • Preserving and enhancing the rich archaeological heritage of North Lincolnshire. • Ensuring that development within Epworth (including schemes needed to exploit the economic potential of the Wesleys or manage visitors) safeguards and, where possible, improves the setting of buildings associated with its Methodist heritage. • Ensuring that development within North Lincolnshire’s Market Towns safeguards their distinctive character and landscape setting, especially Barton upon Humber, Crowle and Epworth. <p>The council will seek to protect, conserve and enhance North Lincolnshire’s historic environment, as well as the character and setting of areas of acknowledged importance including historic buildings, conservation areas, listed buildings (both statutory and locally listed), registered parks and gardens, scheduled ancient monuments and archaeological remains.</p>	<p>construction and appropriate recording of archaeological remains prior to and during construction, secured by a requirement in Schedule 2 of the Draft DCO for a written scheme of investigation in accordance with the Outline Written Scheme of Investigation (Application Document Ref. 7.7).</p>

Policy	Policy Document	Policy Text	Assessment
		<p>All new development must respect and enhance the local character and distinctiveness of the area in which it would be situated, particularly in areas with high heritage value.</p> <p>Development proposals should provide archaeological assessments where appropriate.</p>	
CS11 – Provision and Distribution of Employment Land	Core Strategy	<p>The council will support the continued expansion and improvement of North Lincolnshire’s economy in order to create a step change in the area’s role regionally and nationally. This will be achieved through the identification and allocation in the Housing and Employment Land Allocations DPD of a range of appropriate sites for employment and economic uses that will meet the requirement for an additional 40 hectares of employment land between 2006 and 2021 as identified within the Regional Spatial Strategy. This land will accommodate traditional land use (use classes B1, B2 & B8) as well as key priority growth sectors.</p> <p>[...]</p>	<p>The Proposed Development supports development elsewhere within North Lincolnshire and maximises other special locations, by making appropriate use of the existing brownfield land, infrastructure and workforce available in Keadby.</p> <p>The Proposed Development will individually have major beneficial socioeconomic effects, providing construction employment and directly creating jobs in close proximity to Scunthorpe, as set out in Environmental Statement Volume I Chapter 16 (Socio-economics) (Application Document Ref. 6.2.16).</p>

Policy	Policy Document	Policy Text	Assessment
		<p>General Provisions</p> <p>To support development elsewhere within North Lincolnshire that meet local employment needs and maximises other special locations.</p> <p>In considering all development proposals for employment purposes in North Lincolnshire, regard should be given to making all locations accessible by range of transport modes in particular by public transport, cycling and walking. Accordingly, travel plans will be required setting out how employment locations will be linked to settlements in the area.</p> <p>Rural Economy</p> <p>To deliver a thriving rural economy by supporting development or activities that assist in rural regeneration and that strengthen or diversify rural businesses.</p>	<p>The Proposed Development Proposed Development would 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, capable of creating the step change that Strategic Objective 1 envisages. The Proposed Development would generate significant beneficial local and regional impacts from the direct, indirect and induced employment created by the construction phase on Scunthorpe. Furthermore, it is estimated that the total net employment for the Proposed Development is up to 358 jobs per year during construction and 58 employees during operation.</p>
CS16 – North Lincolnshire’s Landscape, Greenspace and Waterscape	Core Strategy	The council will protect, enhance and support a diverse and multi-functional network of landscape, greenspace and waterscape through:	The Site is not subject to any national landscape designations, neither are there any within the immediate vicinity of the Site. Furthermore, the Proposed Development will not result in the loss of

Policy	Policy Document	Policy Text	Assessment
		<ul style="list-style-type: none"> • Identifying in supporting documents within or evidencing the Local Development Framework, a network of strategically and locally important landscape, greenspace and waterscape areas. Development on or adjacent to these areas will not be permitted where it would result in unacceptable conflict with the function(s) or characteristic of that area. • Requiring development proposals to improve the quality and quantity of accessible landscape, greenspace and waterscape, where appropriate. • Requiring development proposals to address local deficiencies in accessible landscape, waterscape and greenspace where appropriate. • Requiring the protection of trees, hedgerows and historic landscape to be specified where appropriate. <p>The creation and maintenance of the network of landscape, green space and</p>	<p>open space or features that are important to the local landscape.</p> <p>ES Volume I Chapter 14 (Landscape and Visual Amenity (Application Document Ref. 6.2.14)) identifies that there would be some significant ('moderate') adverse effects at a number of nearby undesignated viewpoints, however, the benefits of the Proposed Development are considered to outweigh the impacts on these viewpoints.</p> <p>Mitigation proposals are set out in the Landscaping and Biodiversity Management and Enhancement Plan (Application Document Ref. 5.10), secured in a requirement in Schedule 2 of the Draft DCO.</p>

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		<p>waterscapes will be secured by a range of measures, including protecting open space, creating new open spaces as part of new development, and by using developer contributions to create, improve and maintain green infrastructure assets where appropriate.</p>	
CS17 - Biodiversity	Core Strategy	<p>The council will promote effective stewardship of North Lincolnshire’s wildlife through:</p> <ol style="list-style-type: none"> 1. Safeguarding national and international protected sites for nature conservation from inappropriate development. 2. Appropriate consideration being given to European and nationally important habitats and species. 3. Maintaining and promoting a North Lincolnshire network of local wildlife sites and corridors, links and stepping stones between areas of natural green space. 4. Ensuring development retains, protects and enhances features of biological and geological interest and provides for the appropriate management of these features. 	<p>The Proposed Development will promote effective stewardship of North Lincolnshire’s wildlife through measures outlined in the Landscape and Biodiversity Management and Enhancement Plan (Application Document Ref. 5.10) which describes and demonstrates proposals to achieve benefits for biodiversity.</p> <p>ES Volume I Chapter 6 (Biodiversity and Nature Conservation) (Application Document Ref. 6.2.11) identifies that the Proposed Development has been designed and located to have no likely significant adverse residual construction, operation or decommissioning effects.</p>

Policy	Policy Document	Policy Text	Assessment
		<ol style="list-style-type: none"> 5. Ensuring development seeks to produce a net gain in biodiversity by designing in wildlife, and ensuring any unavoidable impacts are appropriately mitigated for. 6. Supporting wildlife enhancements that contribute to the habitat restoration targets set out in the North Lincolnshire’s Nature Map and in national, regional and local biodiversity action plans. 7. Improving access to and education/interpretation of biodiversity sites for tourism and the local population, providing their ecological integrity is not harmed. 	
CS18 – Sustainable Resource Use and Climate Change	Core Strategy	<p>The council will actively promote development that utilises natural resources as efficiently and sustainably as possible. This will include:</p> <ol style="list-style-type: none"> 1. Meeting high water efficiency standards, and incorporating new technologies to recycle and conserve water resources. 2. Requiring the use of Sustainable Urban Drainage Systems (SuDS) where practicable. 	<p>The Proposed Development is considered to utilise natural resources as efficiently and sustainable as possible. Various chapters of Environmental Statement Volume I (Application Document Ref. 6.2) set out the environmental impacts of the Proposed Development and how pollution is minimised and how resources are to be used efficiently.</p>

Policy	Policy Document	Policy Text	Assessment
		<p>3. Supporting the necessary improvement of flood defences and surface water infrastructure required against the actions of climate change, and preventing development in high flood risk areas wherever practicable and possible.</p> <p>4. Meeting required national reductions of predicted CO2 emissions by at least 34% in 2020 and 80% in 2050 by applying the following measures on development proposals. Requiring all industrial and commercial premises greater than 1000 square metres to provide 20% of their expected energy demand from on site renewable energy until the code for such buildings is applied nationally. Where developers consider these Codes and targets cannot be met on the basis of viability they will be required to provide proof through open book discussions with the council at the planning application stage.</p>	<p>Chapter 12 (Water Environment and Flood Risk) (Application Document Ref. 6.2.12) along with the ES Volume II Appendix 12A: Flood Risk Assessment (Application Document Ref. 6.3.16) contain specific information relating to the use of SuDS.</p> <p>Requirements in Schedule 2 of the Draft DCO (Application Document Ref. 3.1) ensure that the flood mitigation schemes are in accordance with the Flood Risk Assessment, and require space on site for Combined Heat and Power infrastructure, and a Construction Environmental Management Plan.</p> <p>Furthermore, a GHG Reduction Statement is included in the GHG Assessment (Application Document Ref. 7.8) that looks to reduce these emissions as far as possible, in particular through:</p> <ul style="list-style-type: none"> • strategy and governance; • innovative design • lower carbon products and • lean construction techniques.

Policy	Policy Document	Policy Text	Assessment
		<ol style="list-style-type: none"> 5. Ensuring building design reduces energy consumption by appropriate methods such as high standards of insulation, avoiding development in areas subject to significant effects from shadow, wind and frost, using natural lighting and ventilation, capturing the sun’s heat, where appropriate. 6. Supporting development that minimises the consumption and extraction of minerals by making the greatest possible reuse or recycling of materials in new construction, and by making best use of existing buildings and infrastructure. 7. Supporting development that seeks to minimise waste and facilitates recycling and using waste for energy where appropriate. 8. Ensuring that development and land use in areas close to the Humber Estuary and rivers responds appropriately to the character of the area, in the interests of preserving and 	<p>Through implementation of these measures, GHG emissions will be minimised but not eliminated. However, this matter must be seen in the context of the Proposed Development’s role in the decarbonisation of the energy system, including through stimulation of a hydrogen economy and generation of low carbon electricity.</p>

Policy	Policy Document	Policy Text	Assessment
		<p>making best use of limited resources.</p> <p>9. Supporting development that will help to reduce the need to travel for people using that development.</p> <p>10. Ensuring development and land use helps to protect people and the environment from unsafe, unhealthy and polluted environments, by protecting and improving the quality of the air, land and water.</p> <p>11. Supporting renewable sources of energy in appropriate locations, where possible, and ensuring that development maximises the use of combined heat and power, particularly at the South Humber Bank employment site and where energy demands for more than 2MW are required for development.</p> <p>12. Supporting new technology and development for carbon capture and the best available clean and efficient energy technology, particularly in relation to the heavy industrial users in North</p>	

Policy	Policy Document	Policy Text	Assessment
		<p>Lincolnshire, to help reduce CO2 emissions.</p> <p>13. Promote the use of a greenspace strategy and a green infrastructure plan, where applicable, which could help reduce the effects of climate change.</p>	
CS19 – Flood Risk	Core Strategy	<p>The council will support development proposals that avoid areas of current or future flood risk, and which do not increase the risk of flooding elsewhere. This will involve a risk based sequential approach to determine the suitability of land for development that uses the principle of locating development, where possible, on land that has a lower flood risk, and relates land use to its vulnerability to flood. Development in areas of high flood risk will only be permitted where it meets the following prerequisites:</p> <p>1. It can be demonstrated that the development provides wider sustainability benefits to the community and the area that outweigh flood risk. The development should be on previously used land. If not, there must be no</p>	<p>Chapter 12 ‘Water Environment and Flood Risk’ of the ES Volume I (Application Document Ref. 6.2.12) provides an assessment of likely significant effects on the water environment and flood risk as a result of construction, operational and decommissioning phases of the Proposed Development. A site-wide Flood Risk Assessment (‘FRA’) is provided at Appendix 12A of ES Volume III (Document Ref. 6.3.20). In terms of fluvial flood risk, the entire Proposed Development Site is within Flood Zone 3. However, the flood defences are sufficient to prevent overtopping during events with a 0.5% annual probability, the overall sensitivity to fluvial flooding is therefore considered ‘Low’.</p>

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		<p>reasonable alternative developable sites on previously developed land.</p> <p>A flood risk assessment has demonstrated that the development will be safe, without increasing flood risk elsewhere by integrating water management methods into development. Development within the Lincolnshire Lakes area will comply with the flood management principals set out in the Western Scunthorpe Urban Extension Exception Test Strategy. Any further flood management proposals will have to be agreed by both the council and the Environment Agency during the process of the Lincolnshire Lakes Area Action Plan. Development proposals in flood risk areas which come forward in the remainder of North Lincolnshire shall be guided by the Strategic Flood Risk Assessment for North Lincolnshire and North East Lincolnshire. This will ensure that proposals include site specific flood risk assessments which take into account strategic flood management objectives and properly apply the Sequential and, where necessary, Exception Tests.</p>	<p>The construction and operation of the Proposed Development is considered to have a mixture of slight adverse (not significant) and neutral (not significant) effects on the River Trent, Stainforth and Keadby Canal and the various drains in the area. The Proposed Development is resilient to flooding and will not result in an increased risk of flooding elsewhere.</p> <p>The location comprises largely previously developed land and the Proposed Development provides extensive wider sustainability benefits due to its role in providing high amounts of low carbon electricity generation consistent with the urgent need identified in NPS EN-1 paragraph 3.3.58 and which is corroborated by recent policy in the EWP and recent official evidence from the CCC and NIC.</p> <p>The Proposed Development therefore satisfies the Exception Test, with ES Volume I Chapter 12, (Water Environment and Flood Risk) (Application Document Ref. 6.2.12) and ES Volume II Appendix 12A: Flood</p>

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		<p>In addition development will be required, wherever practicable, to incorporate Sustainable Urban Drainage Systems (SUDS) to manage surface water drainage. The Council will also seek to reduce the increase in flood risk due to climate change through measures to reduce carbon dioxide emissions.</p>	<p>Risk Assessment (Application Document Ref. 6.3.16) demonstrating that it would be safe and not result in significant effects in terms of flooding. The EA has reviewed the Flood Risk Assessment undertaken by the Applicant at various stages pre application.</p> <p>Details of the flood risk mitigation measures are secured by a requirement ‘Flood risk mitigation’ of the draft DCO (Application Document Ref. 3.1). Details of surface and foul water drainage (taking account of flood risk mitigation) will be secured by further requirements.</p>
CS20 – Sustainable Waste Management	Core Strategy	<p>The Council will consider new and enhanced facilities for the treatment and management of waste in the following broad strategic areas:</p> <ul style="list-style-type: none"> • Scunthorpe • South Humber Bank Employment Area • Flixborough Industrial Estate • Power station sites and other high energy usage installations 	<p>The Proposed Development will promote sustainable waste management where possible. A requirement in Schedule 2 of the draft DCO (Application Document Ref. 3.1) requires that a Framework Construction Environmental Management Plan including a construction site waste management plan has been approved by the relevant</p>

Policy	Policy Document	Policy Text	Assessment
		<ul style="list-style-type: none"> • Farms which will directly use organic agricultural products derived from waste treatment • <p>In general a sequential search will be made for the location of waste management facilities from the highest to lowest preference as follows:</p> <ol style="list-style-type: none"> 1. On-site management of waste where it arises at retail, industrial and commercial locations, particularly in the main urban areas (The Proximity Principle) 2. Pursuit of neighbourhood self-sufficiency, at the lowest practicable level for the waste stream concerned (The Self-Sufficiency Principle) 3. Encouraging co-location of waste facilities - at Materials or Resource Recovery Parks for example 4. Locations at existing mineral extraction and waste landfill sites 5. Locations at established and proposed industrial and business sites 	<p>planning authority before development is commenced.</p> <p>The Proposed Development does not constrain existing or proposed waste management facilities.</p>

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		<p>6. Locations in redundant farm buildings and associated land</p> <p>7. Use of other previously-developed land.</p> <p>The Council will promote sustainable waste management by:</p> <ul style="list-style-type: none"> • Requiring Site Waste Management Plans for future major developments to minimise waste • Requiring the integration of facilities for waste minimisation, re-use, recycling and composting, in association with the planning, construction and occupation of new development. • Providing guidance on minimising potential social, environmental and economic impacts that are likely to arise in the development of waste infrastructure • Establishing a planning policy framework that identifies suitable locations for waste management. 	
CS25 – Promoting Sustainable Transport	Core Strategy	The council will support and promote a sustainable transport system in North Lincolnshire that offers a choice of	During the construction of the Proposed Development it is proposed that AILs will be brought onto Site via water freight

Policy	Policy Document	Policy Text	Assessment
		<p>transport modes and reduces the need to travel through spatial planning and design and by utilising a range of demand and network management tools.</p> <p>Transport Demand Management</p> <ul style="list-style-type: none"> • Reduce the need to travel and improve accessibility for all as part of all future spatial design within North Lincolnshire • Introduce appropriate demand management measures, to reduce car based travel by ensuring highway safety, improving and encouraging walking and cycling and integrate such measures with a high quality public transport network • Require that transport provision is integrated into the design of all development from the start of any development project • Apply maximum car parking standards and a car parking charging regime within the context of urban and rural renaissance 	<p>where possible, and the contractor will review options for the use of waterborne transport when sourcing construction materials.</p> <p>Furthermore, a Construction Traffic Management Plan and Construction Workers' Travel Plan will be implemented during construction to manage traffic and transportation effects, these will be controlled via requirements, set out in of Schedule 2 of the Draft DCO (Application Document Ref. 3.1) respectively. Framework versions of these documents can be found at Application Document Refs. 7.5 and 7.6 respectively.</p> <p>The Proposed Development also features the creation of a new Site entrance and mitigation measures outlined in ES Volume I Chapter 10 (Traffic and Transport) (Application Document Ref. 6.2.10) and ES Volume II Appendix 10A (Application Document Ref. 6.3.8).</p>

Policy	Policy Document	Policy Text	Assessment
		<ul style="list-style-type: none"> • Support the progressive improvements of a high quality public transport network by working in partnership with public transport operators and community transport providers to ensure a cohesive, flexible approach to improve the public transport network in North Lincolnshire and public transport connections beyond its boundaries. <p>Transport Network Management</p> <ul style="list-style-type: none"> • Support and encourage a Rural Transport Strategy for the rural parts of North Lincolnshire • Support the improvement and enhancement (significant upgrades) of transport interchanges (relating to high quality facilities) in North Lincolnshire, principally at Scunthorpe, Barton upon Humber, Brigg and Humberside Airport • Integrate and enhance the whole spectrum of local transport services to feed into, and be 	<p>The generation of traffic during Proposed Development operation would be minimal when compared to the construction phase. The Transport Assessment (Appendix 10A (ES Volume II - Application Document Ref. 6.3), assesses Proposed Development operational phase traffic effects as negligible and thus not significant.</p>

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		<p>complementary with, a high quality public transport network</p> <ul style="list-style-type: none"> • Support the development of a freight strategy to include lorry parking sites, HGV route management and provision of facilities for (and promote the benefits of) transferring freight delivery from road to rail and/or water transport, wherever practical, particularly in relation to the movement of freight to and from the South Humber Ports and Trent Wharves • Support the progressive introduction of network management technology to maximise existing and future capacity and investment across all transport modes, and to reduce congestion and delay for the benefit of both business and domestic travellers in North Lincolnshire • Establish local, regional and national priorities for transport infrastructure investment 	

Policy	Policy Document	Policy Text	Assessment
		<ul style="list-style-type: none"> Promote the continuation and improvement of North Lincolnshire’s network of safe walking and cycling routes, including the Viking Way, the Public Rights of Way network and the National Cycle Route, as well as the local footway and cycleway network and linking them to key locations in the urban and rural areas of North Lincolnshire (communities, recreational and tourist areas). 	
IN10 – Wharves	Local Plan	<p>Proposals for new or extended port, wharf and jetty facilities on the Rivers Humber and Trent will be permitted provided that there is no adverse impact on:</p> <ul style="list-style-type: none"> sites of nature conservation interest; high quality agricultural land; the landscape of river corridors and coastal margins; the flood defence system; the strategic and local road network; and the amenity of settlements. 	Any water freight during the construction of the Proposed Development is to make use of the existing wharf facilities on the River Trent.

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RD2 – Development in the Open Countryside	Local Plan	<p>Development in the open countryside will be strictly controlled. Planning permission will only be granted for development which is:</p> <ul style="list-style-type: none"> i) essential to the efficient operation of agriculture or forestry; ii) employment related development appropriate to the open countryside; iii) affordable housing to meet a proven local need; iv) essential for the provision of outdoor sport, countryside recreation, or local community facilities; v) for the re-use and adaptation of existing rural buildings; vi) for diversification of an established agricultural business; vii) for the replacement, alteration or extension of an existing dwelling; viii) essential for the provision of an appropriate level of roadside services or the provision of utility services. <p>Provided that:</p>	<p>The Proposed Development, being power generation, would be unsuitable within the development boundaries of Scunthorpe or one of North Lincolnshire’s market towns. All land required for the Proposed Development has been carefully chosen for operational and technical reasons. The Proposed Development is consistent with this policy as it constitutes a form of economic development at an existing established employment site, and will be located largely on previously used land and making use of existing structures and infrastructure. It is located and accessed away from residential areas in an area already characterised by substantial power infrastructure including overhead lines, wind turbines and two power stations, therefore is not out of keeping with local character. The Design Principles Statement, appended to the Design and Access (‘the DAS’)(Application Document Ref: 5.6) describes the impact avoidance measures that will be taken into consideration as part of the detailed design of the Proposed Development.</p>

Policy	Policy Document	Policy Text	Assessment
		<ul style="list-style-type: none"> a) the open countryside is the only appropriate location and development cannot reasonably be accommodated within defined development boundaries; b) the proposed development accords with the specific requirements set out in the relevant policies of this chapter and elsewhere in this Local Plan; c) the development would not be detrimental to the character or appearance of the open countryside or a nearby settlement in terms of siting, scale, massing, design and use of materials; and d) the development would not be detrimental to residential amenity or highway safety; and e) account is taken of whether the site is capable of being served by public transport; and f) the development is sited to make the best use of existing and new landscaping. 	<p>This includes the use of suitable materials to assist with breaking up the massing of the buildings and structures and selecting finishes for the buildings and other infrastructure to create coherence with the adjacent developments including Keadby 2 Power Station . Full details of the proposed design principles are contained in Appendix 1 of the DAS.</p>
T1 – Location of Development	Local Plan	Development proposals, which generate a significant volume of traffic movement,	The impact of additional traffic movements are assessed in the

Policy	Policy Document	Policy Text	Assessment
		<p>will be permitted provided that they are located:</p> <ul style="list-style-type: none"> • in the urban area of Scunthorpe and Bottesford, Barton upon Humber, Brigg, and the areas identified for development at the South Humber Bank and Humberside International Airport; and • where there is good access to rail, water and air transport, or to the North Lincolnshire Strategic Road Network; and • where there is good foot, cycle and public transport provision or where there are opportunities for foot, cycle and public transport to be provided. 	<p>Transport Assessment (ES Volume II - Application Document Ref. 6.3). This concludes that the additional traffic arising from construction activities would result in small, temporary increases of traffic flows, including HGVs, on the roads leading to the Site. These are not considered significant in EIA terms and nor should they be in the context of Policy T1. Operational stage traffic would be even less significant.</p> <p>As the traffic volumes will not be significant, it follows that the criteria in Policy T1 are not relevant.</p> <p>A Construction Traffic Management Plan (Application Document Ref. 7.5) is secured via a requirement in the Draft DCO. Operational staffing related traffic generation and traffic associated with routine maintenance will be limited and a dedicated new permanent access route to the A18 is provided (Work Nos. 8 and 9B) taking account of community feedback during pre-application consultation.</p>

Policy	Policy Document	Policy Text	Assessment
T2 – Access to Development	Local Plan	<p>All development must be provided with a satisfactory access. In larger developments it should be served adequately by:</p> <ul style="list-style-type: none"> • being readily accessible by a choice of transport modes; and • existing public transport services and infrastructure; or • additions or extensions to such services linked directly to the development; and • the existing highway network. 	<p>The Proposed Development will use and improve an existing purpose built and satisfactory access onto the existing highway network. Access to and from the Proposed Development Site for all construction workers would be via the existing construction site entrance for Keadby 2 Power Station, located off the A18. An early part of the construction phase will comprise the replacement of an existing private bridge crossing ('Mabey Bridge'). This would then be used during the construction and operational stages of the Proposed Development.</p>
T6 – Pedestrian Routes and Footpaths	Local Plan	<p>The safety, convenience and attractiveness of footpaths and pedestrian areas will be improved, and areas created, to form a pedestrian-friendly network throughout North Lincolnshire. Major new developments will be required to include links to nearby existing or proposed pedestrian routes.</p>	<p>No impacts on or additional demand for pedestrian networks result from the Proposed Development. Due to the secure nature of the Proposed Development, it is not considered appropriate for linkages between the Proposed Development and the wider pedestrian network, besides access for employees. ES Volume I Chapter 10 (Traffic and Transport) (Application Document Ref. 6.2.10) found that the</p>

Policy	Policy Document	Policy Text	Assessment
			effect of the Proposed Development for pedestrian amenity would be negligible.
T8 – Cyclists and Development	Local Plan	<p>New developments will be required to:</p> <ul style="list-style-type: none"> include cycle links with existing or proposed routes where such opportunity exists; and ensure that the provision of cycle parking facilities are in accordance with the standards set out in Appendix 2. 	<p>While cycling is not expected to be a significant mode during construction due to the need to carry PPE and tools, it could offer a viable mode for some operational staff. The upgraded access included as part of the Proposed Development is likely to be suitable for cyclists accessing the Site for work and will also reduce traffic on narrow roads in the village thereby improving cycling suitability here. A Construction Worker Travel Plan ('CWTP') will be secured by Requirement set out in Schedule 2 of the draft DCO (Application Document Ref. 3.1). It will include measures to promote the use of sustainable transport modes to and from the authorised development by construction staff. The detailed design approval required in respect of Work No.1 includes the approval of cycle parking and routes. A framework CWTP can be found at Application Document Ref. 7.6.</p>
T14 – The North	Local Plan	The Council will manage the use of roads within North Lincolnshire by establishing	The Proposed Development is consistent with the aims of this policy as

Policy	Policy Document	Policy Text	Assessment
Lincolnshire Strategic Road Network (NLSRN)		the area’s Strategic Road Network. Traffic will be concentrated onto these roads whose main purpose will be to carry traffic of more than local significance of both public and private traffic.	it would concentrate traffic onto North Lincolnshire’s Strategic Road Network. HGV traffic has been assigned to the most direct route to the strategic road network which is the M180 Junction 2 via the A18 and the A161.
T19 – Car Parking Provision and Standards	Local Plan	Provision will be made for car parking where it would: <ul style="list-style-type: none"> • meet the operational needs of businesses; or • be essential to the viability of a new development; or • improve the environment or safety of streets; or • meet the needs of people with disabilities; or • be needed by visitors to the countryside; and • comply with Appendix 2 –Parking Provision Guidelines. 	Construction stage parking arrangements are controlled in the Construction Worker Travel Plan (‘CWTP’) which will be secured by a requirement of Schedule 2 of the draft DCO (Application Document Ref. 3.1). A framework CWTP can be found at Application Document Ref. 7.6 . Operational stage parking arrangements are controlled in the detailed design requirement (secured by a further requirement) in Schedule 2 of the Draft DCO. These will meet the operational needs of the business and ensure its viability while remaining within the assessment set out in the ES, and would be designed after the making of the DCO as part of the detailed design process.

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T23 – Water Freight	Local Plan	<p>Proposals for new water freight development will be required to demonstrate that the movement of heavy goods by road is minimised by making use of deep-water frontages in the following ways:</p> <ul style="list-style-type: none"> • locating on deep-water frontages; • ensuring transfer of bulk goods from sea to inland makes optimum use of railways, rivers, canals and pipelines/conveyor belts where appropriate. 	<p>Although the Proposed Development does not feature any new water freight development, it is considered to minimise the movement of heavy goods by road as the Applicant will be prioritising the use of water freight for Abnormally Indivisible Loads ('AILs'), using the existing Waterborne Transport Offloading Area.</p>
T24 – Road Freight	Local Plan	<p>In settlements where heavy goods vehicles endanger safety, cause community severance or environmental intrusion, and alternative routes exist, the movement and parking of these vehicles will be restricted.</p> <p>The environmental impact of moving freight by road will be reduced by:</p> <ul style="list-style-type: none"> • concentrating lorries onto the North Lincolnshire Strategic Road Network; and • banning heavy goods vehicles from sensitive areas; and 	<p>The Proposed Development is considered to protect safety and prevent community severance and environmental intrusion through the use of the most direct route onto the Strategic Road Network for construction traffic and through the use of waterways for AILs.</p>

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		<ul style="list-style-type: none"> encouraging the development of rail freight facilities; and encouraging the use of the waterways. 	
<p>LC1 – Special Protection Areas, Special Areas of Conservation and Ramsar Sites</p>	<p>Local Plan</p>	<p>Proposals for development which may affect an SPA, a proposed SPA, a SAC or candidate SAC will be assessed according to their implications for the site’s conservation objectives. Proposals not directly connected with, or necessary for, the site, and which are likely to have an significant effect on the site (either individually or in combination with other proposals), will not be permitted unless it can be conclusively demonstrated that:</p> <ul style="list-style-type: none"> there is no alternative solution; and there are imperative reasons of overriding public interest for the development. <p>Where the site hosts a priority natural habitat type or a priority species, proposals will not be permitted unless it can be conclusively demonstrated that it is necessary for reasons of human health or public safety, or for consequences of</p>	<p>ES Volume I Chapter 11 (Biodiversity Ecology and Nature Conservation) (Application Document Ref. 6.2.11) identified six European Sites within the desk study area, which was 15km from the Proposed Development. These consisted of the Humber Estuary Ramsar Site, Humber Estuary Special Area of Conservation (‘SAC’), Humber Estuary Special Protection Area (‘SPA’), Thorne and Hatfield Moors SPA, Thorne and Hatfield SAC, and Hatfield SAC.</p> <p>The Proposed Development has been sensitively designed and positioned with reference to the existing baseline conditions and potential pathways for impact. As a consequence, no significant adverse residual construction, operation or decommissioning effects are anticipated on these protected sites as a result of construction of the Proposed Development.</p>

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		<p>primary importance for nature conservation.</p> <p>Where such a development does proceed, the use of conditions or planning obligations to secure all compensatory measures necessary to comply with Article 3 of the EEC Habitats and Species Directive will be considered.</p>	
<p>LC2 – Sites of Special Scientific Interest and National Nature Reserves</p>	<p>Local Plan</p>	<p>Proposals for development in, or likely to affect, Sites of Special Scientific Interest will be subject to special scrutiny. Where such development may have an adverse effect, directly or indirectly on the SSSI, it will not be permitted unless the reasons for the development clearly outweigh the nature conservation value of the site itself and the national policy to safeguard the national network of such sites.</p> <p>Where a site is a National Nature Reserve (NNR) or a site identified under the Nature Conservation Review (NCR) or Geological Conservation Review (GCR) particular regard will be paid to the individual site’s national importance.</p>	<p>ES Volume I Chapter 11 (Biodiversity, Ecology and Nature Conservation) (Application Document Ref. 6.2.11) identified 22 Sites of Special Scientific Interest (‘SSSI’) and 1 National Nature Reserve within the desk study area, which was 15km from the Proposed Development, and a full list of those Sites can be found in Table 11.6.</p> <p>The Proposed Development has been sensitively designed and positioned with reference to the existing baseline conditions and potential pathways for impact. As a consequence, no significant adverse residual construction, operation or decommissioning effects are anticipated on these protected sites</p>

Policy	Policy Document	Policy Text	Assessment
		<p>In all cases where development is permitted which would damage the nature conservation value of the site, such damage should be kept to a minimum. Where development is permitted the use of conditions or planning obligations to ensure the protection and enhancement of the site’s nature conservation value and other appropriate compensatory measures will be considered.</p>	<p>as a result of construction of the Proposed Development.</p>
<p>LC4 – Development Affecting Sites of Local Nature Conservation Importance</p>	<p>Local Plan</p>	<p>Any development or land use change which is likely to have an adverse impact on a Local Nature Reserve, a Site of Importance for Nature Conservation or a Regionally Important Geological Site will not be approved unless it can be clearly demonstrated that there are reasons for the proposal which outweigh the need to safeguard the intrinsic nature conservation value of the site or feature.</p> <p>In all cases where development is permitted which may damage the nature conservation value of the site, such damage shall be kept to a minimum. Where development is permitted the use of conditions or planning obligations to</p>	<p>ES Volume I Chapter 11 (Biodiversity, Ecology and Nature Conservation) (Application Document Ref. 6.2.11) identified no Local Nature Reserves, Sites of Importance for Nature Conservation or Regionally Important Geological Sites within the relevant desk study area.</p>

Policy	Policy Document	Policy Text	Assessment
		ensure the protection and enhancement of the site’s nature conservation value and other appropriate compensatory measures will be considered.	
LC5 – Species Protection	Local Plan	<p>Planning permission will not be granted for development or land use changes which would have an adverse impact on badgers or species protected by Schedules 1, 5 or 8 of the Wildlife and Countryside Act 1981 (as amended).</p> <p>Where development is permitted that may have an effect on those species, conditions or the use of planning agreements will be considered to:</p> <ul style="list-style-type: none"> • facilitate the survival of individual members of the species; and • reduce disturbance to a minimum; and • provide adequate alternative habitats to sustain at least the current levels of population. 	<p>Based on the findings of ES Volume II Appendix 11D: Confidential Badger Report (Application Document Ref. 6.3.12), the potential construction effect on badgers is assessed to be negligible (not significant).</p> <p>As set out in ES Volume I Chapter 11 (Biodiversity and Nature Conservation) (Application Document Ref. 6.2.11) the effects on other species such as bats, water voles, grass snakes, breeding birds, fish and aquatic invertebrates during construction has been assessed as negligible (not significant).</p> <p>Similarly, the effects on fish, bats, terrestrial invertebrates and flora during operation was assessed as negligible (not significant).</p> <p>The DCO application is supported by a standalone Landscape and Biodiversity</p>

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			<p>Management and Enhancement Plan ('LBMEP') (Application Document Ref. 5.10) which sets out biodiversity enhancement proposals and the habitat management and monitoring proposed to deliver these. It also confirms that the proposed enhancement measures are suitable to achieve no net loss and a net gain in biodiversity within the Proposed Development Site. It is proposed that submission and approval of the final LBMEP will be secured by a Requirement of the draft DCO (Application Document Ref. 3.1).</p>
<p>LC6 – Habitat Creation</p>	<p>Local Plan</p>	<p>Provision will be made for the creation of nature reserves and new wildlife habitats both in rural and urban areas. Where appropriate, in granting planning permission, the creation of such areas will be required for the following types of development:</p> <ul style="list-style-type: none"> • in association with the reclamation of former mineral workings and waste disposal sites; • in association with schemes for derelict land clearance; 	<p>The Proposed Development includes provision for the creation of new wildlife habitats. The application is supported by a standalone Landscape and Biodiversity Management and Enhancement Plan ('LBMEP') (Application Document Ref. 5.10) which sets out biodiversity enhancement proposals and the habitat management and monitoring proposed to deliver these. It also confirms that the proposed enhancement measures are suitable to achieve no net loss and a net gain in</p>

Policy	Policy Document	Policy Text	Assessment
		<ul style="list-style-type: none"> on land which is no longer required for long term agricultural use. Particular emphasis will be placed on the creation of habitats such as wet and dry heathland, wet woodland and reedbed in keeping with local and national biodiversity targets and provision of habitat for protected species. 	<p>biodiversity within the Proposed Development Site. It is proposed that submission and approval of the final LBMEP will be secured by a Requirement of the draft DCO (Application Document Ref. 3.1).</p>
LC7 – Landscape Protection	Local Plan	Where development is permitted within rural settlements or within the open countryside, special attention will be given to the protection of the scenic quality and distinctive local character of the landscape. Development which does not respect the character of the local landscape will not be permitted.	<p>The Proposed Development comprises power generation infrastructure that would be unsuitable within the development boundaries of Scunthorpe or one of North Lincolnshire’s market towns. All land required for the Proposed Development has been carefully chosen for operational and technical reasons. It does, however, make use of previously developed land and existing infrastructure.</p> <p>It constitutes a form of economic development at an existing established employment site, and will be located largely on previously used land and making use of existing structures and infrastructure. The generating station (Work No. 1) is located in an area</p>

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			<p>already characterised by substantial power infrastructure including overhead lines and the scale of the main structures is controlled by the design parameters in Schedule 10 of the Draft DCO. Other elements of the Proposed Development have been designed to respect the nature of the Open Countryside.</p> <p>The impact of the Proposed Development on the landscape is assessed in full at ES Chapter 14 Landscape and Visual Amenity (Application Document Ref. 6.2.14).</p>
LC12 – Protection of Trees, Woodland and Hedgerows	Local Plan	Proposals for all new development will, wherever possible ensure the retention of trees, woodland and hedgerows. Particular regard will be given to the protection of these features within the setting of settlements, the protection of ancient woodlands and historic hedgerows and the amenity value of trees within built up areas. Tree preservation orders will be made where trees which contribute to local amenity or local landscape character are at risk.	The Proposed Development includes provision for, where possible, the retention of trees and hedgerows and the creation of new species-rich native hedgerow plantings. The application is supported by a standalone Landscape and Biodiversity Management and Enhancement Plan ('LBMEP') (Application Document Ref. 5.10) which sets out biodiversity enhancement proposals and the habitat management and monitoring proposed to deliver

Policy	Policy Document	Policy Text	Assessment
		<p>Landscaping and tree and hedgerow planting schemes will be required to accompany applications for new development where it is appropriate to the development and its setting.</p>	<p>these. It also confirms that the proposed enhancement measures are suitable to achieve no net loss and a net gain in biodiversity within the Proposed Development Site. It is proposed that submission and approval of the final LBMEP will be secured by a Requirement of the draft DCO (Application Document Ref. 3.1).</p> <p>The biodiversity enhancement measures proposed comprise: creation of flower-rich native grassland; new species-rich native hedgerow plantings; enhancement of field drains for water voles and other aquatic biodiversity; and installation of nest boxes for barn owl and other birds, habitat creation for willow tit, and installation of roosting boxes for bats.</p>
<p>HE5 – Development affecting Listed Buildings</p>	<p>Local Plan</p>	<p>The Council will seek to secure the preservation, restoration and continued use of buildings of special architectural or historic interest. When applications for planning permission relating to a listed building or listed building consent are being assessed, the primary</p>	<p>ES Volume I Chapter 15 (Cultural Heritage) (Application Document Ref. 6.3.15) identified 38 Listed Buildings within the study area.</p>

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		<p>consideration will be the need to preserve or enhance the fabric and character of the building. Permission or consent will not be granted unless it has been demonstrated that the proposed works would secure this objective. The Council will encourage the retention and restoration of the historic setting of listed buildings. Proposals which damage the setting of a listed building will be resisted. Whenever appropriate, proposals which would entail the loss of historic fabric from a listed building will be conditional upon a programme of recording being agreed and implemented.</p>	<p>The effects of the construction of the Proposed Development on these assets were found to be not significant.</p> <p>Due to the scale of the Proposed Development, it is envisaged that opportunities to provide effective landscape screening will be limited. Therefore, the residual effects of the Proposed Development during operation in relation to impacts resulting from change to the setting of Listed Buildings would be the same as during the construction phase.</p>
HE9 – Archaeological Evaluation	Local Plan	<p>Where development proposals affect sites of known or suspected archaeological importance, an archaeological assessment to be submitted prior to the determination of a planning application will be required. Planning permission will not be granted without adequate assessment of the nature, extent and significance of the remains present and the degree to which the proposed development is likely to affect them.</p>	<p>The magnitude of impact on below ground archaeological remains as a consequence of the Proposed Development has been assessed as medium in ES Volume I Chapter 15 Cultural Heritage (Application Document Ref. 6.2.15), resulting in a moderate adverse effect, which in the absence of mitigation would be significant in EIA terms and also in terms of Policy HE9.</p>

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		<p>Sites of known archaeological importance will be protected. When development affecting such sites is acceptable in principle, mitigation of damage must be ensured and the preservation of the remains in situ is a preferred solution. When in situ preservation is not justified, the developer will be required to make adequate provision for excavation and recording before and during development.</p>	<p>The mitigation measures described in Section 15.8 of ES Chapter 15 comprise a programme of geoarchaeological analysis and reporting; and archaeological monitoring during construction. These would not minimise the physical impact to individual heritage assets, as the archaeological evidence would still be removed, but would compensate for their loss by preserving them by record. This would reduce the magnitude of impact on individual assets. This mitigation strategy satisfies the requirements of Policy HE9.</p>
DS1 – General Requirements	Local Plan	<p>A high standard of design is expected in all developments in both built-up areas and the countryside and proposals for poorly designed development will be refused. All proposals will be considered against the criteria set out below:</p> <p>Quality of Design</p>	<p>The Proposed Development is considered to be of a high standard, and further information on the design, including the design evolution can be found in the Design and Access Statement (Application Document Ref. 5.6). The Proposed Development is considered to meet all of the listed criteria and further information is provided in the relevant chapters of ES</p>

Policy	Policy Document	Policy Text	Assessment
		<ul style="list-style-type: none"> • The design and external appearance of the proposal should reflect or enhance the character, appearance and setting of the immediate area; and • the design and layout should respect and where possible retain and/or enhance the existing landform of the site. <p>Amenity</p> <p>No unacceptable loss of amenity to neighbouring land uses should result in terms of noise, smell, fumes, dust or other nuisance, or through the effects of overlooking or overshadowing; and amenity open space in the area should be retained, wherever possible; and no pollution of water, air or land should result which poses a danger or creates detrimental environmental conditions. Where appropriate, conditions will be imposed requiring the provision of landscaping to enhance new development.</p> <p>Conservation</p>	<p>Volume I (Application Document Ref. 6.2). A requirement in the DCO will ensure that approval will be needed for the final design in accordance with the Design Principles contained within the Design and Access Statement.</p> <p>Regarding impact upon amenity to neighbouring land uses, it should firstly be noted that the nearest land use is the rest of the Keadby Power Station site, which is not sensitive to noise or air quality issues. Air quality, noise, water pollution and other human health issues are assessed at ES Chapters 8 Air Quality (Application Document Ref. 6.2.8), 9 Noise and Vibration (Application Document Ref. 6.2.9), 12 Water Environment and Flood Risk (Application Document Ref. 6.2.12) and 17 Population and Human Health (Application Document Ref. 6.2.17). Significant effects are not anticipated on any of these matters.</p> <p>Other design and amenity related proposals are set out in the Landscape and Biodiversity Management and</p>

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		<p>There should not be an adverse effect on features of acknowledged importance, on or surrounding, the site, including species of plants and animals of nature conservation value (particularly species protected by Schedules 1, 5 and 8 of the Wildlife and Countryside Act 1981), Scheduled Ancient Monuments, archaeological remains, listed buildings and Conservation Areas or trees and woodland covered by Tree Preservation Orders; and</p> <p>the development must ensure the retention of those existing site features that make an important contribution to the character or amenity of the site or the surrounding area; and</p> <p>development proposals should include the results of archaeological assessment, where appropriate, and adequate measures to ensure that there would be no unacceptable impacts on archaeological remains. Conditions will be imposed to secure suitable mitigation at the appropriate time in the development process.</p>	<p>Enhancement Plan ('LBMEP') (Application Document Ref. 5.10), Indicative Lighting Strategy (Application Document Ref. 5.11), Framework Construction Environmental Management Plan (Application Document Ref. 7.1). Requirements in the Draft DCO (Application Document Ref. 3.1) ensure the final versions accord with these documents.</p>

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		<p>Resources</p> <p>There should be no conflict with an allocated or approved land-use proposal in the locality nor should the reasonable potential for development of a neighbouring site be prejudiced; and the location and design of developments on the urban fringe (sites adjoining settlement development limits) should take into account the need to minimise the impact of the development on adjoining agricultural land or other countryside interests; and measures to conserve energy will be expected in:</p> <ul style="list-style-type: none"> • the design, orientation and layout of buildings; and • the location of development; and improvements to the transport network and in the management of traffic. <p>Utilities and Services</p> <p>There should be no reliance on public finances being available to provide infrastructure and services; and</p>	

Policy	Policy Document	Policy Text	Assessment
		suitable on-site drainage should be provided and where there are off-site drainage problems the developer will be expected to overcome them.	
DS7 – Contaminated Land	Local Plan	<p>In the case of proposals for development on land known or strongly suspected as being contaminated, applicants will be required to demonstrate that the level of contamination can be overcome by remedial measures or improvements.</p> <p>Permission will only be granted on contaminated sites where a detailed site survey has been submitted, and a suitable scheme of remedial measures has been agreed to overcome any existing contamination. Conditions will be imposed and/or a planning obligation entered into to secure the implementation of such a scheme at the appropriate time in the development process and to otherwise restrict and control the development.</p>	<p>Chapter 13 (Geology, Hydrogeology and Land Contamination) of the ES Volume I (Application Document Ref. 6.2.13) addresses the potential effects of the construction, operation (including maintenance) and decommissioning of the Proposed Development on geology, hydrogeology and land contamination (considering effects to and from any existing contamination and also any potential to cause contamination). It found that effects related to potential geological and land contamination related impacts associated with the Proposed Development during the construction, operation and decommissioning periods are likely to be negligible or minor adverse (not significant).</p> <p>A requirement of Schedule 2 of the draft DCO (Application Document Ref. 2.1) secures details of a scheme to deal with the contamination of land including</p>

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			ground water, which is likely to cause significant harm to person or pollution of controlled waters or the environment.
DS10 – New Hazardous Installations and Pipelines	Local Plan	Planning permission for development which involves the storage of materials or the carrying out of processes that are toxic, highly reactive, explosive or highly flammable will only be granted if the applicant can demonstrate that the proposal will impose no significant development restrictions upon surrounding land users; will not put at risk surrounding residential properties; or prove a risk to other premises in the locality where significant numbers of people regularly congregate.	<p>The Applicant will confirm with the relevant authority the substances that will require Hazardous Substances Consent. Further information on this is provided in the Schedule of Other Consents and Licenses (Application Document Ref. 5.4).</p> <p>The various pipelines will be manufactured and installed so as to fully comply with relevant legislation including the Pressure Equipment (Safety) Regulations 2016 (HM Government, 2016a) and the Pipelines Safety Regulations (PSR) (HM Government, 1996) and all other relevant standards in order to ensure that risks are ALARP.</p>
DS11 – Polluting Activities	Local Plan	Planning permission for development, including extensions to existing premises and changes of use, will only be permitted where it can be demonstrated that the levels of potentially polluting emissions, including effluent, leachates, smoke, fumes, gases, dust, steam, smell or noise do not pose a danger by way of	It is demonstrated that the levels of potentially polluting emissions do not pose a danger. Further information is provided in ES Volume I Chapter 8 (Air Quality, Chapter 9 (Noise and Vibration), Chapter 11 (Biodiversity and Nature Conservation), Chapter 12 (Water Environment and Flood Risk), and

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		toxic release; result in land contamination; pose a threat to current and future surface or underground water resources; or create adverse environmental conditions likely to affect nearby developments and adjacent areas.	Chapter 13 (Geology, Hydrogeology and Land Contamination) (Application Document Ref. 6.2). Air emissions would primarily be regulated through the Environmental Permit, the status of which is described in the Schedule of Other Consents and Licenses (Application Document Ref. 5.4).
DS12 – Light Pollution	Local Plan	Planning applications which involve light generating development including floodlighting will only be permitted where it can be demonstrated that there would be no adverse impact on local amenities.	The application is accompanied by an Indicative Lighting Strategy (Application Document Ref. 5.11) and a requirement of Schedule 2 of the draft DCO (Application Document Ref. 2.1) states that no part of the authorised development may be commissioned until a scheme for all permanent external lighting has been submitted to and approved by the local planning authority.
DS13 – Groundwater Protection and Land Drainage	Local Plan	All development proposals must take account of the need to secure effective land drainage measures and ground water protection in order to control the level of water in the land drainage System.	The Proposed Development is considered to take account of the need to secure effective land drainage measures and ground water protection as set out in ES Volume I Chapter 12 (Water Environment and Flood Risk) (Application Document Ref 6.2.12)

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			and ES Volume II Appendix 12A: Flood Risk Assessment.
DS14 – Foul Sewage and Surface Water Drainage	Local Plan	The Council will require satisfactory provision to be made for the disposal of foul and surface water from new development, either by agreeing details before planning permission is granted, or by imposing conditions on a planning permission or completing planning agreements to achieve the same outcome.	Requirements of Schedule 2 of the Draft DCO (Application Document Ref. 2.1) require that no part of the development commence until details of surface water drainage and foul water drainage systems are submitted to and approved by the local planning authority. The requirement relating to surface water drainage stipulates that the permanent surface water drainage must be in accordance with the Indicative Surface Water Drainage Plan (Application Document Ref. 4.13).
DS15 – Water Resources	Local Plan	Development will not be permitted which would adversely affect the quality and quantity of water resources or adversely affect nature conservation, fisheries and amenity by means of: <ul style="list-style-type: none"> • pollution from the development; or • water abstraction unless adequate measures are undertaken to reduce the impact to an acceptable level. 	A requirement of Schedule 2 of the draft DCO (Application Document Ref. 3.1) secures details of temporary surface water and drainage systems, including means of pollution control for the construction phase of the Proposed Development in accordance with the Indicative Surface Water Drainage Plan. Further requirements secure details of a scheme to deal with the contamination of ground water, which is likely to cause

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			<p>significant harm to person or pollution of controlled waters or the environment.</p> <p>Abstraction from Keadby Canal will be the subject of a licence from the Canal and River Trust. Further information on the other consents required for abstraction are set out in the Schedule of Other Consents and Licenses (Application Document Ref. 5.4).</p>
DS16 – Flood Risk	Local Plan	<p>Development will not be permitted within floodplains where it would:</p> <ul style="list-style-type: none"> • increase the number of people or buildings at risk; or • impede the flow of floodwater; or • impede access for the future maintenance of watercourses; or • reduce the storage capacity of the floodplain; or • increase the risk of flooding elsewhere; or • undermine the integrity of existing flood defences • unless adequate protection or mitigation measures are undertaken. 	<p>Chapter 12 'Water Environment and Flood Risk' of the ES Volume I (Application Document Ref. 6.2.12) provides an assessment of likely significant effects on the water environment and flood risk as a result of construction, operational and decommissioning phases of the Proposed Development. A site-wide Flood Risk Assessment ('FRA') is provided at Appendix 12A of ES Volume III (Application Document Ref. 6.3.20).</p> <p>In terms of fluvial flood risk, the entire Proposed Development Site is within Flood Zone 3. However, the flood defences are sufficient to prevent</p>

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			<p>overtopping during events with a 0.5% annual probability, the overall sensitivity to fluvial flooding is therefore considered 'Low'.</p> <p>The construction and operation of the Proposed Development is considered to have a mixture of slight adverse (not significant) and neutral (not significant) effects on the River Trent, Stainforth and Keadby Canal and the various drains in the area. The Proposed Development is resilient to flooding and will not result in an increased risk of flooding elsewhere.</p> <p>The location comprises largely previously developed land and the Proposed Development provides extensive wider sustainability benefits due to its role in providing high amounts of low carbon electricity generation consistent with the urgent need identified in NPS EN-1 paragraph 3.3.15 and which is corroborated by recent policy in the EWP and recent official evidence from the CCC and NIC. The Proposed Development therefore satisfies the Exception Test, with ES</p>

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			<p>Volume I Chapter 12, (Water Environment and Flood Risk) (Application Document Ref. 6.2.12) and ES Volume II Appendix 12A: Flood Risk Assessment (Application Document Ref. 6.3.20) demonstrating that it would be safe and not result in significant effects in terms of flooding. The EA has reviewed the Flood Risk Assessment undertaken by the Applicant at various stages pre application.</p> <p>Details of the flood risk mitigation measures detailed within the DCO Application will be secured by a requirement of the draft DCO (Application Document Ref. 3.1). Details of surface and foul water drainage (taking account of flood risk mitigation) will be secured by further requirements.</p>
DS17 – Overhead Power Lines and High Powered Electrical Installations	Local Plan	The Council will seek to minimise the environmental effects of proposals for overhead power lines of 132kv or over, and high-powered electrical installations. The Council will not support such development within or in locations where	No new overhead lines are proposed as part of the works required for the Proposed Development. The existing electrical infrastructure in the area comprises 132 kilovolt (kV) and 400 kV

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		<p>the development would have a detrimental impact upon the following areas:</p> <ul style="list-style-type: none"> i) Special Protection Areas, Special Areas of Conservation and Ramsar sites; ii) SSSIs or other statutory nature conservation sites; iii) Conservation Areas and sites and buildings of historic or archaeological interest, including listed buildings and scheduled monuments; iv) existing committed or allocated housing areas. <p>In view of the substantial practical, technical and cost disadvantages involved, it is only in exceptional circumstances that the Council will seek to have lines placed underground, where this is not damaging to sites of nature conservation value or archaeological importance. Careful line routing will usually be the most appropriate way to minimise the visual impact of high voltage power lines.</p>	<p>overhead lines as well as underground cables that serve existing substations.</p> <p>The Proposed Development includes overground or underground electrical power export lines from the Low Carbon Gas Power Station to the existing 400kV National Grid Electricity Transmission (NGET) Substation located adjacent to Keadby Power Station, including works within the substation (which would be undertaken by NGET); and up to 132 kilovolt underground electrical cables to the Low Carbon Gas Power Station from the existing Northern Powergrid Substation located at Chapel Lane, including works within the substation, for the supply of electricity at up to 132kV to the Proposed PCC Site.</p>

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		To ensure a satisfactory built environment the Council will have regard to the amenity of potential future occupiers in determining applications for development close to overhead power lines.	

