

From: [REDACTED]
Sent: 14 January 2026 16:56
To: Keadby Next Generation
Subject: Keadby Next Generation Power Station (EN0110001) - Additional Submission: Objection to CHP Assessment

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For the attention of the Examining Authority,

Further to my registration enquiry of 14th January 2026, I am writing to submit a technical objection regarding the Applicant's Combined Heat and Power (CHP) Assessment v1 (dated 22nd September 2025).

My objection focuses on two material errors in the Applicant's assessment methodology which misapply national policy and regulations to avoid a full feasibility study.

1. Misapplication of the 15km Search Radius In Section 4.1.1, the Applicant restricted their heat demand search to a 15km radius. This appears to be implicitly relying on the cost-benefit analysis exemption criteria in [Schedule 24](#), Paragraph 5 of the Environmental Permitting (England and Wales) Regulations 2016.

However, this 15km search radius applies specifically to exemptions for "Installations generating waste heat" (Paragraph 3) and "Heating and cooling networks" (Paragraph 4). The Keadby project falls under Paragraph 2 ("Electricity generating installations"), which is explicitly distinct from Paragraph 3.

There is no statutory provision in Schedule 24 that permits an electricity generating installation (Paragraph 2) to use the 15km radius as a hard limit to screen out Cost-Benefit Analysis (CBA). By applying an exemption designed for other waste heat sources, the Applicant has failed to assess the economic feasibility of longer-distance transmission (e.g., to Doncaster which is some 21km away), thereby failing the test in NPS EN-1 (2024), Paragraph 4.8.12 to "explain why CHP is not economically or practically feasible" based on actual project economics rather than arbitrary distance.

2. Erroneous Use of Primary Energy Savings (PES) In Section 2.4.1, the Applicant introduces Primary Energy Saved (PES) which in section 4.4.1 is used as a justification for not performing a CBA. This is a material error.

The Environmental Permitting Regulations 2016 do not list low PES scores as a valid exemption for conducting a CBA. PES is a metric for defining "High Efficiency CHP" after assessment; it is not a screening tool to avoid the assessment itself. The Applicant has conflated the outcome of a CBA with the requirement to perform one.

Conclusion The Applicant's CHP Assessment is methodologically flawed. It relies on a misinterpretation of Schedule 24 to artificially constrain the search area and uses an invalid metric (PES) to bypass the required economic analysis and necessary engagement with potential users of the heat. I respectfully request that the Examining Authority requires the Applicant to submit a revised CHP Assessment that complies with the full requirements of NPS EN-1 and the Environmental Permitting Regulations.

Yours sincerely,



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