Application by Keadby Next Generation Limited for an Order Granting Development Consent for the Keadby Next Generation Power Station Project

Written Representation for Deadline 1. 4 February 2026

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Interested Party Reference number: [redacted]

1. I submit that the Applicant has not shown that the proposed development is needed to meet the objectives of government policy on energy security and net zero.

2. The proposal involves the compulsory purchase acquisition of land, so it must demonstrably be in the public interest. I submit that the public interest test is not met.

3. In short, the proposed development is not consistent with policy objectives and is not in the public interest because it relies largely, possibly completely, on 'Natural Gas'. The Applicant has stated that any Hydrogen used as a fuel, would most likely be derived from natural gas (Blue Hydrogen), rather than gas manufactured by renewable energy-powered electrolysis (Green Hydrogen). Whether fuelled by Hydrogen or abated natural gas, this proposed development has the effect of continuing and possibly increasing the UK's reliance on fossil fuels.

4. As context I draw the Examining Authority's attention to statements made in the past 18 months by the Secretary of State for Energy and Net Zero concerning the UK's dependence on natural gas.

5. This month when ***announcing the Hamburg Declaration***, the DESNZ SoS said,

> *"We are standing up for our national interest by driving for clean energy, which can get the UK off the fossil fuel rollercoaster and give us energy sovereignty and abundance."*

6. In the ***Clean Power 2030 Action Plan: A new era of clean electricity – main report*****,** of 15 April 2025, DESNZ SoS wrote:

> *"In an increasingly unstable world, our dependence on fossil fuels leaves us deeply vulnerable as a country – and that is true no matter where they come from.*
> *But there is a solution: by sprinting to clean, homegrown energy, we can take back control from the dictators and the petrostates."*

7. In his ***speech to the September 2024 Energy UK conference*** the SoS said:

> *"Yes Britain has made progress on the rollout of renewables, but we still depend on gas to generate more than a third of our electricity and to heat more than four out of five of our homes.*
> *The decline of North Sea production since the 2000s now means more than half of that gas comes from abroad.*
> *But what matters even more, and this is the critical point, is that whether the gas comes from the North Sea or is imported, it is sold at the same price on the international market.*

Britain is a price-taker not a price-maker.
So every therm of gas we bought, wherever it came from, shot up in price in response to Putin's invasion of Ukraine.
This is the fundamental point not understood in policy debates.
And so as long as we are dependent on fossil fuels, no matter where they come from, we will be stuck on the rollercoaster of volatile international markets."

8. These comments show that in seeking to minimise consumer pricing and to improve energy security, a key aspect of UK energy policy is to reduce dependence on natural gas as quickly as possible, no matter where the gas is sourced from.

9. The proposed development would add to UK's installed gas power capacity when government is seeking to reduce dependency on gas. A number of other similar proposed developments are consented or in the process of being consented. Aggregated with the Keadby Next Generation proposal, the proposed additional capacity would represent a 10% increase in gas power, contrary to the following point.

10. Government policy does allow for the continued use of unabated natural gas for power generation beyond this decade. But as set out in the ***Clean Power 2030 Action Plan: A new era of clean electricity – main report*****,** **(**extract below) government's view is that retaining the existing gas-fired power stations and extending their lifetime is *"likely to be the most cost-effective means of meeting the capacity we need for gas to fulfil its strategic function in 2030".*

*"**Unabated gas***

As clean power substantially reduces the amount of electricity generated by gas-fired plants, unabated gas will change its role in the system. Under a clean power system, it will play a back-up role at specific times throughout the transition to clean power. This means retaining sufficient unabated gas capacity until well beyond 2030, when it can be safely replaced by low carbon technologies that can provide the amount of long-duration flexibility necessary to keep the system balanced at all times. We currently rely on ~35 GW of unabated gas on the system to provide long-duration flexible capacity. This firm capacity is crucial for electricity security, and will be required as strategic back-up to respond to certain periods of high demand, even as we aim to reduce fossil generation (gas running hours) overall.

Existing assets

Retaining the existing gas fleet where possible is likely to be the most cost-effective means of meeting the capacity we need for gas to fulfil its strategic function in 2030. Current fleet intelligence suggests most existing gas assets will remain online until 2030, but we are also consulting on measures to make it easier for gas assets to stay in the Capacity Market and for plants to access multi-year Capacity Market agreements, encouraging investment in life extension of older plants."

11. Table 1 taken from the ***Clean Power 2030 Action Plan: A new era of clean electricity – main report,*** shows that the current installed capacity (35GW) of (unabated) gas power generating capacity is sufficient up to 2030:

Table 1: Installed capacity in 2030 in the NESO 'Further Flex and Renewables' and 'New Dispatch' scenarios, and the DESNZ 'Clean Power Capacity Range', compared to current installed capacity (GW)

Technology	Current installed capacity[footnote 20]	NESO 'Further Flex and Renewables' Scenario	NESO 'New Dispatch' Scenario	DESNZ 'Clean Power Capacity Range'[footnote 21]
Variable: Offshore wind	14.8	51	43	43 – 50
Variable: Onshore wind	14.2	27	27	27 – 29
Variable: Solar	16.6	47	47	45 – 47
Firm: Nuclear	5.9	4	4	3 – 4
Dispatchable: Low Carbon Dispatchable Power[footnote 22]	4.3	4	7	2[footnote 23] – 7
Dispatchable: Unabated gas	35.6	35	35	35[footnote 24]
Flexible: LDES	2.9	8	5	4 – 6
Flexible: Batteries	4.5	27	23	23 – 27
Flexible: Interconnectors	9.8	12	12	12 – 14
Flexible: Consumer-led flexibility[footnote 25]				

12. Under 'DESNZ Clean Power Capacity Range' the projected need in 2030 for low carbon dispatchable power ranges from 2 to 7GW, representing a maximum expansion of 2.7GW from the currently installed 4.3GW.

13. The following list shows the most recent NSIP consents for new gas powered generating stations, and NSIP applications expected to be submitted in the next two years.

Gas power station	MW	Examination status
Net Zero Teeside	860	consented
Killingholme	470	consented
Connah's Quay	1380	in examination
Peterhead	910	in examination
Total	**3620**	
Ferrybridge Next Gen	1200	Dec-26
Walpole Flexible Generation	2000	Mar-28
Theddlethorpe	1500	May-27
Stanlow	200	Dec-26
Stallingborough	900	Jul-27
Total	**5800**	
GRAND TOTAL	**9420**	

14. There is already 3.6GW of new low carbon dispatchable gas power capacity consented or in examination. A further 1.2GW of low carbon capacity is consented at Drax using biomass.

15. I submit that with the existing pipeline of low carbon dispatchable generation capacity of 4.8GW this proposed development is unnecessary.

16. I respectfully request that my comments are reflected in the Examining Authority's report to the Secretary of State.