



Your Ref EN0110001

Our Ref IPP-229

Tuesday 3 February 2026

Proposal: EN0110001 Keadby Next Generation Power Station Project.

Canal & River Trust Response Submission for Deadline One (interested Party Number: [REDACTED])

### Summary of Oral Submissions Made at Issue Specific Hearing 1 (ISH1) (21/01/2026)

The Canal & River Trust's written comments below summarise those matters raised in our oral submissions made at the Issue Specific Hearing 1 meeting held on 21/01/2026.

In summary:

#### C. Landscape and Visual Effects

1. The Trust was invited to comment about our observation that an existing band of trees lie next to the canal, and that the proposals currently indicate their removal for the construction of the abstraction apparatus. The Trust raised the issue that the existing band of trees did provide an existing benefit to the canal, through contributing to its semi-rural appearance and reducing the visual impact of functional infrastructure behind.
2. **The Trust does note the likely need for tree removal to construct the scheme but wishes to highlight that mitigation should be considered, if possible, to explore whether tree replacement works could occur to reduce the visual impacts to canal users at this location.**
3. We welcomed the request of the ExA at the hearing for the applicant to review this matter further. We look forward to reviewing the applicant's further information.

#### D. Adequacy of Documents and Other Matters

##### Matters concerning Restrictions to the Width of the Stainforth & Keadby Canal during Construction

1. The Trust made comment with respect to the wording within the Construction and Environmental Management Plan (CEMP) (APP-166) which states that the works to construct a temporary cofferdam will involve works extending 20m into the Stainforth & Keadby Canal (e.g. paragraph 5.4.35).
2. A 20m projection would restrict the available navigation width to the south to approximately 10m, which would be insufficient to allow for the safe passage of vessels during the works. We are concerned that this would result in the effective closure of the canal for indefinite periods of time during the works, which would cause disruption to boat users and is not in line with our statutory duties to maintain the waterway for commercial use.
3. We highlighted that the outfall for the completed Keadby 2 development was constructed with a cofferdam extending only 10m from the north bank, and that the Keadby 3 Project was approved also with a 10m

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cofferdam. Due to the similarities between the projects, we consider that a cofferdam projecting 10m, as opposed to 20m, could be feasible, and would overcome our concern.

4. We also highlighted that Part 4, Paragraph 19 of the draft Development Consent Order (DCO), when viewed alongside the submitted works and land plans, seeks powers to restrict navigation in the canal up to 20m from the north bank, and that this seemed to be related to the description of the works in the CEMP document.
5. We highlighted that we raised the above matters with the applicant at a meeting held on 19/01/2026, and that they promised to get back to the Trust on this matter.
6. In addition, we note that the applicant did highlight that the draft Protective Provisions do give the Trust control over the diversion of access/navigation, which could help the Trust ensure that no significant restriction to Navigation will occur. The Trust are presently reviewing this, and will be able to provide further written comments on this matter.

#### **Matters Concerning Obstructions at Keadby Lock**

7. The Trust highlighted that the proposals intend to utilise Railway Wharf for the delivery of Abnormal Indivisible Loads to the site.
8. Large vessel using the wharf can result in obstructions to Keadby Lock. We highlighted a concern that the CEMP (APP-166) states that notices to Mariners ('Notices and Stoppages') will be requested through the Canal & River Trust to inform boats of closure times. During previous use of the Wharf for the Keadby 2 project, vessels would often arrive outside of previously agreed times, for example due to their voyages taking longer or shorter than expected, providing limited additional notice of their arrival. This poses a safety risk for boaters wishing to access the lock from the River Trent, as without sufficient notice, these craft could become stranded on the on the river as it is tidal and some vessels can only navigate safely on tidal rivers at specific times.
9. We raised a concern that this matter was not assessed in the Navigational Risk Assessment (APP-075). We note the applicant claimed differently at the hearing. Our comment related to whether the Assessment refers to ALL deliveries at Railway Wharf, and whether it specifically refers to the danger of vessels being stranded on a tidal river should vessels blocking access to Keadby Lock arrive at short notice, outside of prior agreed times. Prior notification of times did not, for the Keadby 2 scheme, previously prevent unplanned closures.
10. Although the Trust note that the applicant seeks to provide a Wharf Management Plan, reserved as a requirement in the draft DCO, we do have concern that principles of procedures to prevent and/or minimise unplanned obstructions to Keadby Lock should be identified beforehand. This is to prevent a circumstance arising where an acceptable solution cannot be identified when it comes to discharging the requirement. This could be achieved through agreement with the Trust of an Outline Wharf Management Plan that identifies key principles that will be adopted to prevent unplanned closures of the Lock at short notice.

#### **E. Draft Development Consent Order**

11. Wording of the Protective Provisions are still to be settled. (note: Further to submissions at the hearing, by way of explanation, the Trust's legal representatives receive the Applicant's comments on the latest draft Provisions on 16<sup>th</sup> January 2026. Changes to the applicant's legal representation in October has slowed progress, and some matters previously agreed with the applicant have been re-opened). The Trust's legal representatives are working with the applicant's solicitors presently with an aim of agreeing Provisions.
12. At the hearing, we highlighted that the Keadby 3 Project was agreed alongside a suite of commercial agreements that are not in place for this latest project. We appreciate this is not a concern for the Ex A, but the Trust's solicitors will be communicating with the Applicant's solicitors shortly with a view to ensuring they are fully appraised of the context with the Keadby 3 Protective Provisions.

Please do not hesitate to contact me with any queries you may have.

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Yours sincerely,

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