

## **Keadby Next Generation Power Station – EN0110001**

### **Natural England - Principal Areas of Disagreement Statement (PADS) – Deadline 1**

**Date:** 4 February 2026

Natural England have provided a summary of the most significant outstanding matters raised in our Relevant and Written Representations. This is based on the documents available on The National Infrastructure Project Service Portal on the above date.

<b>PADS reference</b>	<b>Principal issue in question.</b>	<b>The brief concern held by Natural England which will be reported on further at relevant Examination deadlines.</b>	<b>What needs to change, be included, or amended, to overcome the disagreement.</b>	<b>Likelihood of the concern being addressed in examination.</b>
<b>PADS1</b>	Air pollution impacts to designated sites during construction.	Further information is required to determine no LSE to Humber Estuary designated sites during construction for NOx, ammonia, Ndep and SO2.	Whether generators are to be used during the construction period should be considered, and an assessment of impacts should be provided if required.  The air quality annex in the ES indicates over 1% changes in Ndep from the project alone at several receptors, and NOx over 1% at one receptor. Justification as to why this would not result in AEOI should be provided.	Likely

<b>PADS2</b>	Air pollution impacts to designated sites during operation.	Further information is required to determine no LSE to Humber Estuary and Risby Warren designated sites during operation (alone impacts).	<p>Clarification is required on whether amines will be emitted as part of the process, and if so whether they have been considered in deposition calculations.</p> <p>Further assessment of the impacts to designated site features which will be impacted by a PC &gt;1% should be provided.</p> <p>Full information of the further assessment required is included within our Written Representations letter.</p>	Likely
<b>PADS3</b>	Noise and Visual disturbance to birds on adjacent arable habitat.	Additional information is required to rule out potential impacts to birds associated with the Humber Estuary SPA/Ramsar.	Further clarification is needed on the difference between background noise levels and the peaks during piling. The draft HRA AA cites habituation of birds to background noise, but does not clearly demonstrate timings and level of periodic noise potential impacts that current background noise may have on bird behaviour.	Likely
<b>PADS4</b>	Water quality impacts to Humber Estuary designated sites	The HRA should include additional information on impacts and mitigation in order to justify conclusions presented.	Evidence should be provided on the pollutants, anticipated temperature and volume of water discharges for this development and how impacts to the designated sites were screened out.	Likely

<p><b>PADS5</b></p>	<p>In combination assessment within the HRA (in particular, for air impacts)</p>	<p>Throughout the HRA and AA it should be made clear which developments, and which combinations of effects, are being considered when the wording “in-combination” is being used.</p>	<p>Clarification should be provided on which sources have been included within the in combination assessment, along with justification for those omitted.</p> <p>Clarification should be provided on whether the results presented in App8B cover the project alone or in combination. If it is alone, an in combination assessment is required for statutory receptors which are not in receipt of a significant contribution from this development alone.</p>	<p>Likely</p>
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