



Maritime &
Coastguard
Agency

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Your Ref: EN0110001

Our Ref: Interested Party number [REDACTED]

4th February 2026

Via email: KeadbyNextGeneration@planninginspectorate.gov.uk

Dear Sir/Madam

Application by Keadby Next Generation Limited for an order granting development consent for The Keadby Next Generation Power Station Project (EN0110001)

Examination Authority Written Representation - deadline 1, 4th February 2026)

The Maritime and Coastguard Agency (MCA) has an interest in the works associated with the marine environment, and the potential impact on the safety of navigation, access to ports, harbours and marinas and any impact on our search and rescue obligations. The MCA would expect any works in the marine environment to be subject to the appropriate consents under the Marine and Coastal Access Act 2009 before carrying out any marine licensable works.

Chapter 12 of the Environmental Statement (ES) Water Environment & Flood Risk, ES Non Technical Summary, ES Volume 1 Chapter 4 The Proposed Development, the Navigation Risk Assessment (NRA), and the draft Development Consent Order (DCO) have been reviewed, and we would like to comment as follows:

It is our understanding that the proposed site falls within the jurisdiction of a Statutory Harbour Authority (SHA) – ABP Humber (for the River Trent) and Sheffield and South Yorkshire Navigation – The Canals and Rivers Trust (for the Stainforth and Keadby Canal). The SHA and Sheffield and South Yorkshire Navigation are responsible for maintaining the safety of navigation within their waters during the construction and the operational phase of the project.

The Environmental Statement

Chapter 12 of the Environmental Statement covering Water environment & Flood Risk confirms the extent of the marine receptors of the project:

Section 12.7.7 states that “it is considered that there would be negligible magnitude of impact to the River Trent from any waterborne transport, given the scale of the watercourse and control measures” and “Construction of the abstraction point behind a cofferdam in the Stainforth and Keadby Canal would have a minor adverse magnitude impact”.

Navigation Risk Assessment process

We note the application is supported by a Navigation Risk Assessment (NRA) which considers and assesses the proposed works associated with the Stainforth and Keadby Canal and navigational safety in relation to the use of Railway Wharf on the tidal River Trent for construction deliveries and the impact on other marine users in consultation with the relevant SHAs/navigation authorities. The NRA methodology is in accordance with MGN 654 IMO Formal safety risk assessment methodology which we welcome.

With regards to impacts assessed, we note that the construction of a temporary cofferdam within Keadby Canal, use of a workboat and AIL movements in the River Trent and Stainforth and Keadby Canal were assessed and we understand that the identified impacts for marine users were As Low As Reasonably Practicable (ALARP) with risk control protocols detailed in the Outline Construction Environmental Management Plan (CEMP). The MCA has reviewed the risk mitigation measures contained in the NRA (Table 12C.10) which include pre-construction engagement with ABP Humber and The Canal and River Trust (CRT), notifications and lighting and warnings to ensure mariners are aware of the river works in both locations which we welcome. This will ensure that any identified risks are ALARP.

We understand that consultation has been undertaken with ABP Humber to inform the NRA as well as with the CRT and that historical experience for Keadby 2 power station has also helped to inform the NRA. The MCA recommends that the availability of sufficient space for safe navigation in the Keadby Canal whilst the cofferdam is in situ should be agreed with the CRT.

Development Consent Order (DCO)

It is the MCA’s understanding from the ES Chapter 12 that no physical works are proposed below the high-water mark in the River Trent, therefore the DCO does not need to contain a Deemed Marine Licence.

The Draft DCO also includes a Schedule 2 Requirement 22 for a Construction Traffic Management Plan which is to include a wharf management plan; this will be submitted to the CRT before works begin. The wharf management plan “*shall include processes for agreeing in advance the general principles around scheduling of abnormal load deliveries that would temporarily obstruct the entrance to Keadby Lock and notifying the Canal and River Trust as to the timing of such deliveries, and measures that seek to avoid such deliveries occurring outside of the notified timings*” which we welcome as a method for vessel traffic management. We also note in Schedule 34 that the undertaker must consult with the CRT on the Construction Environmental Management Plan which we welcome.

Finally, the MCA would encourage the applicant to continue working with the SHAs and relevant navigation authorities to develop a robust Safety Management System (SMS) for the project in accordance with the [Ports and Marine Facilities Safety Code \(PMSC\)](#) and its associated Guide to Good Practice, to ensure that the risk and impact on other marine users are As Low As Reasonably Practicable (ALARP).

We hope this information is useful to the Examination Authority at this stage.

Yours faithfully,

[Redacted signature]

[Redacted name]

Marine Licensing Project Lead
UK Technical Services Navigation