



SUMMARY

Climate Change

**EN0110001 - The Keadby Next Generation
Power Station Project**

- 1 This is a summary of my submission (my deadline D1 Written Representation, WR) which provided as a separate document, and contains my submissions on Climate Change and the Keadby Next Generation Power Station (KNGPS) project. The WR submission also acts to provide a summary of my oral submissions at ISH1.
- 2 The WR submission concerns the adequacy of the greenhouse gas (GHG) assessment in the Environmental Statement (ES) for the Keadby Next Generation Power Station (KNGPS). It does not seek to challenge national energy or hydrogen policy, nor to substitute an alternative Environmental Statement. Instead, it addresses a specific and legally orthodox question: whether the ES has demonstrated that its GHG assessment bounds a reasonable worst-case envelope, as required by the EIA Regulations.
- 3 The ES relies on a small number of quantitative assumptions that materially determine the scale of the emissions reported. These include assumptions relating to upstream natural gas emission factors: the role of LNG in UK gas supply, and the treatment of near-term methane emissions. The operation of the development would also depend upon hydrogen fuel supply, and therefore upon the lifecycle emissions associated with that fuel. Where upstream blue hydrogen production is part of the fuel supply to the development, it also depends upon upstream natural gas emissions. The ES applies an assumed cap to upstream hydrogen emissions by reference to a policy-derived threshold. Where such assumptions are outcome-determinative, EIA law requires either that they demonstrably bound plausible higher-impact outcomes or that sensitivity analysis is provided to show that higher impacts would not materially alter the assessment.
- 4 The Environmental Statement does not do so, and provides no analysis to demonstrate that higher-impact outcomes are bounded. Instead, it relies primarily on nationally averaged, historically anchored emission factors and policy-derived thresholds. These inputs are not designed to represent reasonable worst cases, yet they are applied in a way that constrains the maximum emissions reported. The relevant issue for EIA purposes is not whether these inputs are “official” or commonly used, but whether the Applicant has shown that they bound the range of impacts that could realistically arise during the operational lifetime of the development. To be clear, the issue is not the provenance of these inputs, but the manner in which they are used: they are applied in a way that constrains the maximum impacts reported, without demonstration that they bound plausible higher-impact outcomes.
- 5 This issue is particularly acute for upstream natural gas emissions. The lifecycle emissions of the Proposed Development are highly sensitive to assumptions about gas supply chains, including methane leakage rates and the increasing role of LNG in marginal UK supply. These upstream emissions are uncapturable, occur outside the site boundary, and are capable of materially altering total lifecycle emissions. Although the ES acknowledges uncertainty in these

parameters, it does not test whether that uncertainty could give rise to materially higher emissions than those assessed.

- 6 Hydrogen does not introduce a separate problem; it amplifies the same one. Where hydrogen is produced from natural gas (i.e. blue hydrogen), its lifecycle emissions are dominated by the same upstream gas supply assumptions. The ES assesses hydrogen-fuelled scenarios based on an assumed lifecycle emissions cap derived from the Low Carbon Hydrogen Standard (LCHS), without demonstrating that this cap bounds the emissions that could realistically arise across realistic upstream conditions or over the lifetime of the project. As with gas combustion, the issue is evidential rather than normative: whether the assumed cap bounds plausible higher-impact outcomes.

Overall, while the ES repeatedly acknowledges uncertainty, it does not address the legal consequence of that uncertainty where it determines the magnitude of effects. Acknowledged uncertainty becomes legally material where it controls outcomes and no analysis is provided to demonstrate that higher-impact outcomes are excluded. That is the position here, in the context of the matters before the Examining Authority.

- 7 CESL submits that, for these reasons, the ES is presently inadequate in respect of GHG assessment, not because its assumptions are necessarily incorrect, but because it has not been demonstrated that those assumptions bound the reasonable worst case. Without that demonstration, the Examining Authority cannot be satisfied that the likely significant GHG effects of the Proposed Development have been fully and lawfully assessed.