

North Lincolnshire Council

NORTH LINCOLNSHIRE COUNCIL

LOCAL IMPACT REPORT

**Planning Act 2008 (as amended)
Infrastructure Planning (Examination Procedure) Rules 2010**

**SUBJECT: APPLICATION FOR AN ORDER GRANTING DEVELOPMENT
CONSENT FOR THE KEADBY NEXT GENERATION POWER STATION
PROJECT**

APPLICANT: KEADBY NEXT GENERATION LIMITED

**SITE: LAND AT AND IN THE VICINITY OF THE EXISTING KEADBY POWER
STATIONS (KEADBY 1 AND KEADBY 2), KEADBY, NEAR SCUNTHORPE,
NORTH LINCOLNSHIRE**

Planning Inspectorate's Reference: EN0110001

February 2026

1. INTRODUCTION

1.1 This report has been prepared by North Lincolnshire Council in accordance with the advice and requirements set out in the Planning Act 2008 and Advice Note One: Local Impact Reports (Version 2) issued by the Infrastructure Planning Commission in April 2012.

1.2 The Advice Note states that a Local Impact Report (LIR) should indicate where the local authority considers the development would have a positive, negative or neutral effect on the area. The LIR may include any topics that they consider to be relevant to the impact of the development on their area as a means by which their existing body of knowledge and evidence on local issues can be fully and robustly reported to the Commission.

1.3 The Advice Note indicates that topics addressed in the LIR may include:

- site description and surroundings/location;
- details of the proposal;
- relevant planning history and any issues arising;
- relevant development plan policies, supplementary planning guidance or documents, development briefs or approved master plans and an appraisal of their relationship and relevance to the proposals;
- relevant development proposals under consideration or granted permission but not commenced or completed;
- local area characteristics such as urban and landscape qualities and nature
- conservation sites;
- local transport patterns and issues;

- site and area constraints;
- designated sites;
- socio-economic and community matters;
- consideration of the impact of the proposed provisions and requirements within the draft Order in respect of all of the above;
- development consent obligations and their impact on the local authority's area.

1.4 The LIR may also comment on the development consent obligations and the requirements and also any relevant representations.

1.5 In producing this LIR, the Council has not sought the views of local parish councils and local interest groups because the parish councils and other local groups have the opportunity, through the consultation process, to make their observations direct to the Planning Inspectorate.

1.6 The LIR is intended to be used by the Council as a means by which the existing body of local knowledge and evidence on local issues is fully and robustly reported to the appointed Examining Authority.

1.7 Set out below is the LIR of North Lincolnshire Council. It identifies the most relevant policies and the main issues that concern this Council.

2. LOCATION

2.1 It is considered that the Application documents clearly and robustly set out the context for the site. This includes identification of the existing development that makes up the Keadby Power Station Site and identification of the nearest settlements and sensitive receptors.

- 2.2 The application site is located close to the western bank of the River Trent and adjacent to the Keadby and Stainforth Canal and a number of drainage ditches, which are subject to Local Wildlife Site designations. The River Trent immediately to the east of the application site forms part of the designated RAMSAR, SSI and SAC designations of the Humber Estuary. It is also noted that the Stainforth and Keadby Canal is locally designated as a Local Wildlife Site.
- 2.3 The site is located outside of any defined development limit and is unallocated for any specific land use as part of the Development Plan for North Lincolnshire. Notwithstanding this, the immediate surroundings of the site are characterised by energy generation and transmission infrastructure including the existing Keadby Power Station site, Keadby Windfarm, a National Grid 400kV substation and electricity pylons and associated power lines.
- 2.4 The existing Keadby Power Station Site comprises the operational Keadby 1 Power Station and the Keadby 2 Power Station. Both of these power stations are fuelled by natural gas. There is a long history of energy generation at the Keadby Power Station Site.
- 2.5 The site benefits from extant consent for the erection of the Keadby 3 gas fired power station with carbon capture under The Keadby 3 (Carbon Capture Equipped Gas Fired Generating Station) Order 2022.
- 2.6 The site encompasses approximately 77.1 hectares, of which approximately 26.7 hectares is proposed for construction laydown. The Main Site, which will house the combined cycle gas turbines (CCGTs) covers an area of 13.8 hectares to the west of the Keadby 2 Power Station and to the east of the former Keadby Ash Tip.
- 2.7 The nearest settlement is the village of Keadby which is approximately 1km east of the 'main' Site. Other nearby settlements include the village of Ealand (2.2km) and the market town of Crowle (3.6km) to the west; the village of

Althorpe approximately 1.7km to the south-east and the village of Gunness located on the eastern bank of the River Trent. There are a number of individual residential properties that sit closer to the site, and the Council is content that the Application documents appropriately identify these individual receptors.

- 2.8 The wider area is rural in nature and is characterised by flat, low lying, farmland delineated by drainage ditches and relatively open field boundaries.

3. PROPOSED DEVELOPMENT

- 3.1 This Application seeks consent for a CCGT electricity generating station designed to run on 100% hydrogen (the ambition is that this would be the fuel used from inception) and able to run on 100% natural gas or a blend of the two of up to 910 megawatts net electrical output; hydrogen and natural gas supply infrastructure, water supply and electricity connections; above ground installations; utilities connections; construction laydown areas; access; and other associated and ancillary development.

- 3.2 The proposed development would constitute an alternative the consented Keadby 3 project and that only one of the projects could/would be brought forwards dependent on Government policy and the delivery of necessary infrastructure within the area.

- 3.3 A more detailed breakdown of the proposed development and ancillary works is set out in Schedule 1 of the draft Development Consent Order (DCO) [APP-007] and within Chapter 4 of the Environmental Statement (ES) [APP-038] and is what the Council has based this LIR on.

4. PLANNING HISTORY

- 4.1 The Planning Statement Rev 1 [AS-010] submitted by the Applicant accurately outlines the planning history that is relevant to the current proposal at Section 2.1.

- 4.2 In general the planning history of the site relates to its historic development for a coal fired power station and later development of the existing gas fired power stations (Keadby 1 and 2).
- 4.3 Of specific relevance to this Application is the extant DCO for a new gas fired power station with carbon capture (Keadby 3).

5. POLICY FRAMEWORK

5.1 NATIONAL POLICY STATEMENTS

5.1.1 In accordance with Section 104 of the Planning Act 2008, in determining applications for development consent decision makers must have regard to:

- (a) any national policy statement which has effect in relation to development of the description to which the application relates;
- (aa) the appropriate marine policy documents (if any), determined in accordance with section 59 of the Marine and Coastal Access Act 2009;
- (b) any local impact report submitted to the Secretary of State before the deadline specified in a notice under section 60(2);
- (c) any matters prescribed in relation to development of the description to which the application relates; and
- (d) any other matters which the Secretary of State thinks are both important and relevant to the Secretary of State's decision.

5.1.2 Paragraph 4.1.12 of the Overarching National Policy Statement (NPS) for Energy (NPS EN-1) clarifies that along with NPS's:

“Other matters that the Secretary of State may consider both important and relevant to its decision-making may include Development Plan Documents or other documents in the Local Development Framework.”

Paragraph 4.1.15 goes on to confirm that:

“In the event of a conflict between these documents and an NPS, the NPS prevails for the purposes of Secretary of State decision making given the national significance of the infrastructure.”

5.1.3 An updated (2025) version of the National Policy Statements (NPSs) for energy came into force on 6 January 2026. However, the transitional arrangements outlined in paragraphs 1.6.2 and 1.6.3 of the 2025 NPS EN-1 make it clear that, for any DCO application accepted prior to the final publication of the 2025 amendments, the 2024 suite of NPSs that came into force on 17 January 2024 will have effect for the purpose of decision making by the relevant Secretary of State. The 2025 NPSs are capable of being important and relevant considerations and the extent to which they are relevant is a matter for the Secretary of State to determine. Accordingly, the Council considers that the 2024 NPSs for energy are the relevant policies for the determination of the Application.

5.1.4 The Overarching NPS for Energy (NPS EN-1) sets out the Government’s national energy policy, explains the need for new energy infrastructure and instructs the Secretary of State on how to assess the generic impacts of energy infrastructure development. It sets out the urgency for new energy infrastructure and provides that the Secretary of State should start with a presumption in favour of granting a DCO for energy Nationally Significant Infrastructure Projects unless any more specific and relevant policies set out within the NPS’s clearly indicate that consent should be refused; or that Section 104 of the Planning Act 2008 applies.

5.1.5 Section 104 states that an application for energy infrastructure must be decided in accordance with the relevant NPSs except where in doing so it would cause one or more of the following:

- lead to the UK being in breach of its international obligations;
- be in breach of any statutory duty that applies to the Secretary of State;
- be unlawful;
- result in adverse impacts from the development outweighing the benefits; or
- be contrary to regulations about how decisions are to be taken.

5.1.6 In considering proposals, and particularly when weighing up adverse impacts and benefits, the Secretary of State should take in to account the proposals:

- potential benefits, including its contribution to meeting the need for energy infrastructure, job creation, reduction of geographical disparities, environmental enhancements, and any long-term or wider benefits; and
- potential adverse impacts, including on the environment, and including any long-term and cumulative adverse impacts, as well as any measures to avoid, reduce, mitigate or compensate for any adverse impacts, following the mitigation hierarchy

5.1.7 Paragraph 3.3.49 explains that hydrogen could be capable of replicating the role of natural gas as a fuel source in the electricity system.

- 5.1.8 Paragraph 4.2.4 confirms that there is a critical national priority (CNP) for the provision of nationally significant low carbon infrastructure. For electricity generation this is confirmed, in paragraph 4.2.5, to include all onshore and offshore generation that does not involve fossil fuel combustion, as well as natural gas fired generation which is carbon capture ready. Paragraph 4.2.5 also confirms that low carbon infrastructure also includes “... *pipelines and storage infrastructure, which fits within the normal definition of “low carbon”, such as hydrogen distribution, and carbon dioxide distribution.*”
- 5.1.9 The NPS for Fossil Fuel Electricity Generating Infrastructure (NPS EN-2) specifically relates to natural gas fired generating stations; however, paragraph 1.6.3 confirms that it may also be important and relevant to hydrogen gas fired generating stations. It states “*The majority of new generating capacity will need to be low carbon. But new unabated natural gas generating capacity will also be needed during the transition to net zero. This will ensure that the system remains reliable and affordable.*”
- 5.1.10 The NPS for Gas Supply Infrastructure and Gas and Oil Pipelines (NPS EN-4) provides guidance on the assessment of applications for new gas and oil pipelines. Key technology specific considerations for gas pipelines include proximity to sensitive land uses when planning routes; pipeline safety; noise and vibration; biodiversity; landscape and visual; water quality and resources; and soils and geology. Clean hydrogen is specifically identified in paragraph 1.1.4 as being important to the transition to net zero, with the potential to decarbonise vital UK industry sectors, including power.
- 5.1.11 The NPS for Electricity Networks Infrastructure (NPS EN-5) outlines the principles which the Secretary of State will apply to the consideration of applications for new electricity transmission lines as well as associated infrastructure, such as substations. Considerations to be taken into account include biodiversity and geological conservation, landscape and visual, noise and vibration, electric and magnetic fields and sulphur hexafluoride.

5.2 NATIONAL PLANNING POLICY FRAMEWORK

5.2.1 The National Planning Policy Framework (NPPF) (December 2024 - amended February 2025) sets out the Government's planning policies for England and how these are to be applied. Paragraph 5 of the NPPF makes it clear that the document does not contain specific policies for NSIP's and that NSIP applications should be determined in accordance with the decision-making framework set out in the Planning Act 2008 and relevant NPSs, as well as other matters that are relevant. Paragraph 5 clarifies that relevant matters may include the NPPF.

5.2.2 Paragraph 7 of the NPPF recognises the purpose of the planning system as contributing to the achievement of sustainable development. Paragraph 8 goes on to identify three overarching objectives of the planning system in pursuing sustainable development: economic, social and environmental; and confirms that these objectives should be pursued in mutually supportive ways. The NPPF, at paragraph 11, also introduces a presumption in favour of sustainable development.

5.2.3 The following sections of the NPPF are considered to be relevant to the consideration of this application:

- Achieving sustainable development
- Decision making
- Building a strong, competitive economy
- Promoting healthy and safe communities;
- Promoting sustainable transport;
- Achieving well-designed places;
- Meeting the challenge of climate change, flooding and coastal change;
- Conserving and enhancing the natural environment; and
- Conserving and enhancing the historic environment.

5.2.4 The policies contained within the NPPF are expanded upon and supported by the Planning Practice Guidance (PPG). The sections of the PPG most relevant to the consideration of this application are:

- Air Quality;
- Climate Change;
- Design;
- Environmental Impact Assessment;
- Flood Risk and Coastal Change;
- Healthy and safe communities;
- Historic Environment;
- Land affected by contamination;
- Light Pollution;
- Natural Environment;
- Noise; and
- Travel plans, Transport Assessments and Statements.

5.3 *LOCAL DEVELOPMENT PLAN*

5.3.1 The current Local Development Plan for North Lincolnshire comprises the saved policies of the North Lincolnshire Local Plan (2003); the North Lincolnshire Core Strategy (2011); and the North Lincolnshire Housing and Employment Land Allocations Development Plan Document (2016). There are no Neighbourhood Plans relevant to the determination of this application. It is considered that these Development Plan documents are “important and relevant” considerations as defined in the Planning Act 2008.

5.3.2 The Development Plan policies relevant to the consideration of this application are set out below.

5.3.3 North Lincolnshire Core Strategy (2011):

- CS1 – Spatial Strategy for North Lincolnshire;
- CS2 – Delivering More Sustainable Development;
- CS3 – Development Limits;
- CS5 – Delivering Quality Design in North Lincolnshire;
- CS6 – Historic Environment;
- CS11 – Provision and Distribution of Employment Land;
- CS16 – North Lincolnshire’s Landscape, Greenspace and Waterscape;
- CS17 – Biodiversity;
- CS18 – Sustainable Resource Use and Climate Change;
- CS19 – Flood Risk;
- CS20 – Sustainable Waste Management; and
- CS25 – Promoting Sustainable Transport;

5.3.4 North Lincolnshire Local Plan (2003):

- IN10 – Wharves;
- RD2 – Development in the Open Countryside;
- T1 – Location of Development;
- T2 – Access to Development;
- T5 – Green Travel Plans;
- T6 – Pedestrian Routes and Footpaths;
- T8 – Cyclists and Development
- T14 – The North Lincolnshire Strategic Road Network (NLSRN)
- T18 – Traffic Management;
- T19 – Car Parking Provision & Standards;
- T23 – Water Freight;
- LC1 – Special Protection Areas, Special Areas of Conservation and Ramsar Sites;

- LC2 – Sites of Special Scientific Interest and National Nature Reserves;
- LC4 – Development Affecting Sites of Local Nature Conservation Importance;
- LC5 – Species Protection;
- LC6 – Habitat Creation;
- LC7 – Landscape Protection;
- LC12 – Protection of Trees, Woodland and Hedgerows;
- HE5 – Development affecting Listed Buildings;
- HE9 – Archaeological Excavation;
- DS1 – General Requirements;
- DS7 – Contaminated Land;
- DS10 – New hazardous installations and pipelines;
- DS12 – Light Pollution;
- DS13 – Groundwater Protection and Land Drainage;
- DS14 – Foul Sewage and Surface Water Drainage;
- DS15 – Water Resources;
- DS16 – Flood Risk;
- DS17 – Overhead Power Lines and High-Powered Electrical Installations; and
- DS21 – Renewable Energy.

5.3.5 North Lincolnshire Housing and Employment Land Allocations Development Plan Document:

- PS1 – Presumption in favour of sustainable development

5.4 EMERGING NORTH LINCOLNSHIRE LOCAL PLAN

5.4.1 North Lincolnshire Council is currently in the process of preparing a new Local Plan to 2043. Once formally agreed this document will replace the current

North Lincolnshire Local Plan (2003), North Lincolnshire Core Strategy (2011) and Housing and Employment Land Allocations DPD (2016).

5.4.2 Most Recently NLC undertook an initial engagement and call for sites consultation in May 2025.

5.4.3 The new Local Plan will not have been subject to formal examination prior to the expiry of the statutory 6-month examination period in respect of the Application. As such it is considered that the emerging Local Plan is not a relevant consideration in the determination of the Application.

5.5 *PLANNING POLICY OVERVIEW*

5.5.1 The Local Development Plan does not make specific allocation of land for energy generation purposes. Notwithstanding this, due to the scale and nature of the proposed development and the location of the application site, there are a number of adopted development plan policies that are relevant to establishing the principle of development. This includes those policies that deal with development within the countryside, policies relevant to the identification and provision of employment land and those related to renewable energy generation.

Development in the countryside

5.5.2 The application site is located predominantly outside of defined development limits and as such policies RD2 of the North Lincolnshire Local Plan and CS2 and CS3 are relevant in assessing the principle of development. These policies seek to generally direct development within defined development limits and to previously developed sites. However, Policy RD2 does allow employment related development appropriate to the open countryside provided that the open countryside is the only appropriate location and that the development cannot reasonably be accommodated within development boundaries. Policies CS2 and CS3 similarly make allowance for uses that require a countryside location.

- 5.5.3 Industrial development is not normally considered to be development appropriate to the open countryside. However, in this instance the Application seeks development consent to construct a new power station within and immediately adjacent to the existing Keadby Power Station Site. Given the scale and nature of the proposed development it would not be possible for it to be located within existing development limits; this is not uncommon for new energy/renewable energy developments. As such there is a need to locate the proposed development outside of defined development limits.
- 5.5.4 With regards to the appropriateness of the location, both the application site and the local area has a long history of power generation and associated infrastructure. Furthermore, the site currently benefits from extant development consent for a gas fired power station (Keadby 3), with the proposed hydrogen fired power station representing an alternative proposal but a broadly similar form of development. In addition, large parts of the site constitute brownfield land, being previously developed.
- 5.5.5 The site also offers access to electrical and gas connections that are essential to the proposed development and the siting adjacent to the existing power stations provides synergies in terms of key infrastructure, services, operations and maintenance. Furthermore, the siting of the proposed development also means that it will be viewed in the context of existing large-scale industrial structures and energy infrastructure. Therefore, it is considered that there is a justification for siting the proposed development outside of defined development limits in this instance.

Employment

- 5.5.6 There is policy support for the proposed development with regards to economic growth within the energy sector, which is identified as one of the main business sectors within North Lincolnshire (NLCS Chapter 9 para. 9.11). Policy CS11 of the NLCS seeks to support the continued expansion of and improvement of North Lincolnshire's economy in order to create a step

change in the area's role both regionally and nationally. It seeks to do this primarily through the identification of key strategic sites for future employment related development; with regards to other locations Policy CS11 seeks to support development that would meet local employment needs and maximise other special locations. The site does not fall within one of the identified strategic employment areas; however, given the existing two power stations and other energy related infrastructure (wind farms, National Grid substation, transmission lines etc.) in the area the site does offer specific locational benefits and the proposed development would form part of an existing energy "cluster" and as such the site is considered to constitute a special location in accordance with Policy CS11.

Renewable energy

- 5.5.7 The proposed development also benefits from policy support with regards to sustainable development and the provision of renewable energy development. Policy DS21 of the NLLP is supportive of new renewable energy development in principle subject to an appropriate assessment of impacts, including upon amenity and the environment. Policy CS18 of the NLCS seeks to actively promote development that utilises natural resources as efficiently and sustainably as possible. It sets out a number of measures to achieve this aim including, inter alia, supporting renewable sources of energy in appropriate locations and supporting new technology and development for carbon capture and best available clean and efficient energy technology to help reduce CO2 emissions.

Summary

- 5.5.8 Overall it is considered that the proposed development generally accords with the aims of the Development Plan in respect of sustainable economic development and the generation of renewable energy. These matters weigh in favour of the proposed development and the principle of development is considered to be merited subject to conformity with the relevant policies of the

plan, including those that seek to protect the environment and amenity of the area.

6. PRE-APPLICATION CONSULTATION

- 6.1 North Lincolnshire Council has previously expressed the opinion that it has no objection to the degree of community consultation undertaken and that this consultation has been undertaken as required by Sections 42, 47 & 48 of the Planning Act 2008 (as amended).
- 6.2 The Applicant has engaged in proactive and useful pre-application discussions with the Council, which have been successful in resolving the majority of concerns prior to the Application being submitted.

7. LANDSCAPE AND VISUAL IMPACT

- 7.1 The relevant development plan policies against which to assess the proposed development's effect upon landscape and visual impact are Policy RD2 of the NLLP, which seeks to protect the character and appearance of the countryside; Policy DS1 of the NLLP, which requires all new development to respect and where possible retain and/or enhance the existing landform; and Policy LC7, which requires special attention to be given to the protection of the scenic quality and distinctive local character of the landscape.
- 7.2 The Council has assessed the submitted information concerning the assessment of the landscape and visual impacts and the potential cumulative impact of the proposed development. This is included in ES Chapter 14 [APP-048]. The representative viewpoints set out in Table 14.3 have been discussed with and agreed by the Council, as has the study area. Having considered this the Council is satisfied that the submitted assessment can be relied upon as a reasoned explanation of the potential impacts of the proposed development.

- 7.3 The site does not fall in an area designated nationally or locally for its landscape value and is located within an area that is characterised by significant industrial, energy related development, including the adjacent Keadby 1 and Keadby 2 Power Stations, Keadby Windfarm, a National Grid 400kV substation and electricity pylons and transmission lines. It is therefore agreed that the proposed development would not be out of keeping with the existing character of the area.
- 7.4 Potential impacts on local and more distant views and landscape character types have been assessed. Overall, the potential for harm is relatively low, as the new structures will be set within an area already affected by power stations, pylons and windfarms. Moderate adverse effects on visual amenity are predicted at three viewpoints, but again, this has to be considered in the context as a minor additional effect on areas already affected by intrusive structures.
- 7.5 Impact avoidance measures are set out in Section 14.7 of the ES [APP-048] and in the submitted Outline Landscape and Biodiversity Management and Enhancement Plan [APP-161]. These measures are proposed to be secured by Requirement 6 of the Draft DCO [AS-003]. North Lincolnshire Council support these measures, recognising in particular that:
- it is not possible to screen such large-scale structures, but screening of low level “clutter” can be valuable;
 - details of finishes, massing and the disposition of taller structures etc. are important in minimising visual impacts against the skyline.
- 7.6 Given the scale and mass of the proposed development it is not feasible to eliminate the visual impacts of the development and as such there will be residual effects in this regard. Despite this fact it must be noted that this location already supports substantial industrial developments which contribute significantly to the character of the area.

7.7 The residual visual impacts of the development must be weighed in the planning balance when the Application is determined. However, for the reasons outlined above these impacts are considered to be significantly outweighed by the benefits of the proposed development.

8. TRAFFIC AND TRANSPORT

8.1 The most relevant development plan policies against which to assess the traffic and transport impacts of the proposed development are Policy RD2 of the NLLP, which requires that new development in the open countryside is not detrimental to highway safety; Policy T1 of the NLLP, which requires developments that generate significant vehicle movements to be located in urban areas or where there is good access to transport networks; and Policy T2 of the NLLP, which requires all new developments to be served by a satisfactory access.

8.2 The Council has assessed the submitted information concerning the assessment of potential traffic and transport effects of the proposed development. This is set out in ES Chapter 10 [APP-044] and includes the Transport Statement [APP-065], Outline Construction Traffic Management Plan [APP-167] and Outline Construction Workers Travel Plan [APP-168].

8.3 The Applicant has undertaken pre-application discussions with the Local Highway Authority and the relevant advice issued has been incorporated into the submitted information. The Council are satisfied that the Applicant has demonstrated that the proposed development will not have an adverse impact on the highway network.

8.4 NLC has no significant concerns with the proposed development in respect of traffic and transport. The main impact on the local highway network will be during the construction phase and there are requirements (Requirements 22 and 23) within the Draft DCO [AS-003] to secure a Construction Traffic Management Plan and a Construction Workers Travel Plan. These will set out

how the impact of construction traffic on the highway network will be managed and also mitigated against.

- 8.5 The proposals in terms of construction access are similar to those agreed for Keadby 2 and Keadby 3. All construction traffic will access the site directly from the A18 via Mabey Bridge. The Applicant has identified that Mabey Bridge will require replacing and this is proposed to be undertaken prior to the main construction works starting on site as part of a phase of early preparation works.
- 8.6 A temporary Traffic Regulation Order (TRO) for a 40mph speed limit on the A18 is proposed in the vicinity of the site access. Whilst the Local Highway Authority would agree to this temporary TRO for the duration of construction works, a permanent reduction to the speed limit would not be supported.
- 8.7 It is noted that the proposed amendments to the site access on the A18, identified in the Keadby 3 DCO are no longer being pursued and the reasoning for this is accepted.
- 8.8 The Local Highway Authority is satisfied with the methodology for calculating construction movements and that this will not have an adverse impact on the highway network.
- 8.9 Further to the above, both the Outline Construction Traffic Management Plan [APP-167] and Outline Construction Workers Travel Plan [APP-168] have been reviewed and are considered to be acceptable.
- 8.12 Overall the proposed development is considered to have a neutral impact on the local highway network and would accord with the relevant development plan policies listed above.

9. BIODIVERSITY AND ECOLOGY

- 9.1. The relevant development plan policies against which to assess the proposed development's effect upon the natural environment, including protected species and biodiversity, are Policy LC4 of the NLLP, which seeks to protect areas of local nature conservation importance; Policy LC5 of the NLLP, which requires development proposals to have no adverse impact on protected species; Policy DS1 of the NLLP, which requires developments to have no adverse effect on features of acknowledged importance, including species of nature conservation importance; and Policy CS17 of the Core Strategy, which seeks to retain, protect and enhance features of biological interest and secure biodiversity gains from developments.
- 9.2 The Council has assessed the submitted information concerning the assessment of potential ecological effects of the proposed development. This is set out in ES Chapter 11 [APP-045].

Habitat Regulations

- 9.3 The application site lies adjacent to the Humber Estuary Special Area of Conservation (SAC) and Ramsar site. Atmospheric dispersion modelling has been necessary to evaluate the potential for air pollution effects on more distant sites, such as Humber Estuary Special Protection Area (SPA), Thorne Moor SAC and Thorne and Hatfield Moors SPA.
- 9.4 The Applicant has provided the Secretary of State, as Competent Authority, with all the information reasonably required for a Habitats Regulations Assessment (HRA) in the form of a shadow HRA. Potential impacts, such as noise and visual impacts on birds, water pollution, impacts on lampreys and air pollution impacts appear to have been assessed appropriately, taking into account Natural England's advice.
- 9.5 Notwithstanding this, we note that Natural England has outstanding concerns in relation to the shadow HRA and air pollution impacts on Sites of Special Scientific Interest (SSSI).

- 9.6 Whilst it is not possible at this stage to determine that there will be no adverse effect on the integrity of the Humber Estuary SAC, SPA and Ramsar Site, we would suggest that the HRA carried out for the North Lincolnshire Green Energy Park DCO may offer a model as to how to address issues of air pollution.
- 9.7 The evidence presented demonstrates that there will be no adverse effect on the integrity of the Humber Estuary SPA and Ramsar site due to displacement or disturbance of interest features or assemblage species from functionally linked land.
- 9.8 Most matters relating to water pollution and ecology appear to have been addressed, though it is noted that Natural England has concerns about the infilling of ditches.

Sites of Special Scientific Interest (SSSI)

- 9.9 The air quality assessment predicts a potential nutrient nitrogen deposition impact at two national nature conservation designations – Crowle Borrow Pit SSSI and Risby Warren SSSI. Natural England has advised that:

“The air quality assessment for Crowle [Borrow] Pits SSSI should provide additional detail on the potential for this development to slow recovery of the designated site pollutant levels.

The air quality critical load for Hatfield Chase Ditches SSSI should be given as the value for fen habitat, and an assessment should be undertaken.

Further information required for air quality impacts to Risby Warren SSSI. This application has a >1% process contribution for the designated site. The latest habitat assessment for the SSSI identifies air pollution as a reason for unfavourable condition due to existing exceedances.”

9.10 Risby Warren SSSI is a nationally important site for lowland dry acid grassland, which is already significantly affected by emissions to air. Although the proposed development is only one contributory factor, it is important that all available measures are taken to avoid further pollution of this site, so that recovery of lichen heath communities can be encouraged.

Protected and Priority Species

9.11 The Council has considered the application in accordance with Natural England's standing advice for protected species. The survey methods used and the survey effort deployed are appropriate for the site in question. The following species or groups are all believed to be absent or largely unaffected by the development:

- Great crested newt
- Otter
- Roosting and foraging bats
- Schedule 1 bird species
- White-clawed crayfish
- Aquatic invertebrates

9.12 A water vole licence may be required due potential works affecting some drains and infilling others. Impacts on fish, nesting birds, badgers and other terrestrial mammals should be controlled though the proposed Construction Environmental Management Plan (CEMP) that would be secured by Requirement 16 of the Draft DCO [AS-003].

Habitats

9.13 Keadby Ash Tip supports 15 hectares of the priority open mosaic habitats on previously developed land (OMH) and has been ascribed national importance for its acid grassland and OMH habitats and its invertebrate communities.

- 9.14 0.25 ha (or 1.7%) of this resource, at the very edge of the Ash Tip, will be lost to the proposed development, as described in the ES. Section 11.7.40 of the ES [APP-045] highlights that, *“The area of vegetation that will be lost is peripheral to the main area of OMH and has a relatively level compacted stone substrate due to it coinciding with an area used in the past as a vehicle access route. Therefore, while it is part of the OMH by virtue of its connection to the wider habitat resource, it lacks the characteristics of the wider habitat resource that result in its high value (i.e. varied topography, variable substrates, more complex vegetation structure).”*
- 9.15 Furthermore, whilst the assessment assumes that this resource will be lost, applying the precautionary principle, Section 11.7.41 of the ES [APP-045] notes that some of the area may naturally regain valuable ephemeral/ short perennial vegetation.
- 9.16 Sections D.6.6. to D.6.11 of the Outline Landscape and Biodiversity Management and Enhancement Plan Report [APP-161] set out a proposal to partly mitigate for the loss of poor quality OMH by creating flower-rich habitat near to Keadby Ash Tip. Flower-rich grassland is a recognised component of OMH, providing habitat structure and nectar for a variety of invertebrates. Blanket replacement of structurally varied OMH with flower-rich grassland would not be acceptable. However, it is the Council’s view that the creation of flower-rich grassland to add to the wider 15-hectare mosaic and mitigate for the 1.7% loss is acceptable.
- 9.17 To maintain botanical diversity, the grassland must be created on nutrient-poor soils and managed positively thereafter, to prevent succession to rank grassland. Overall, the approach to OMH is acceptable.
- 9.18 The original version of the submitted ES chapter on biodiversity and nature conservation [APP-045] recorded that, *“Construction of the Proposed Canal Water Intake could (pending the post-consent detailed design) result in the loss of two likely veteran and two likely ancient goat willow trees of national nature conservation value. As these are irreplaceable habitats the habitat loss*

is permanent and cannot be fully compensated (although a compensation strategy is still required). [...] The effect from the loss of each likely veteran/ancient tree is assessed as meaningful at the national level in each instance and therefore is major adverse (significant).”

9.19 Revision 1 of this ES chapter (Application document reference 6.2.11, Rev 1), submitted with the Applicant’s response dated 14 January 2026 to the Examining Authority’s Rule 6 letter states that, *“The potential for veteran and ancient trees, and irreplaceable habitats of national nature conservation value, to be affected was determined through a specialist arboricultural survey and a subsequent on-site consultation with Tree Officers from North Lincolnshire Council, as summarised in the Tree Survey Report [...]. No veteran or ancient trees will be affected by the Proposed Development.”*

9.20 The Councils’ Principal Arboricultural & LNR Manager has provided the following further confirmation:

*“The multi-stem goat willows assessed do not meet the criteria for classification as veteran or ancient trees. While goat willow (*Salix caprea*) is a relatively short-lived species, none of the specimens displayed the key morphological, structural, or ecological characteristics typically associated with veteran or ancient status. In particular, there was no evidence of significant trunk hollowing, extensive deadwood, wood mould, saproxylic habitat, historic pollarding, retrenchment growth, or other advanced age-related features. The multi-stem form observed is consistent with past coppice or regrowth behaviour typical of the species and does not, in itself, indicate veteranisation. Furthermore, the trees did not exhibit notable habitat features of high ecological value that would elevate them beyond their age class. On this basis, the goat willows are considered to be of mature but non-veteran status and do not qualify as ancient trees.”*

- 9.21 This position has been agreed with the Applicant and will be confirmed through a Statement of Common Ground (SoCG) between the Applicant and the Council, which is currently being produced.
- 9.22 Construction of the proposed development is expected (pending detailed design) to require the removal of 0.1ha of poor-quality plantation woodland on Chapel Lane. Construction of the Canal Water Abstraction could (pending detailed design) require the worst-case removal of 0.18ha of secondary broad-leaved woodland, 40% of which is open space dominated by nettles. This woodland would be replanted but would take time to mature. There will be a permanent loss of 0.29ha of scrub, but 0.46 ha of mixed scrub are proposed to be planted across a number of parcels. Overall, it is considered that the effect on woodland and scrub is neutral.
- 9.23 Construction of the Main Site could result in the loss of two minor field drains and part of a third. These drains hold no or only shallow permanent water and support a very limited diversity of aquatic and wetland plant species (up to six higher plant species per drain).
- 9.24 The Applicant proposes ditch creation and enhancement as part of the biodiversity net gain proposal. The ES states that detailed design will allow for:
- sensitive profiling to maximise niches for aquatic and wetland flora;
 - planting of a diverse mixture of native and locally appropriate wetland plant species;
 - provide stands of common reed as nesting habitat for bird; and
 - ensure suitable access to allow the ditches to be maintained long-term.

Biodiversity Enhancement

9.25 The submitted Outline Landscape and Biodiversity Management and Enhancement Plan Report (OLBMEP) [APP-161] makes the following statement:

“Proposals for landscape and biodiversity enhancement have been developed to achieve the following outcomes:

- *no net loss of biodiversity and a quantifiable gain for biodiversity as a result of the Proposed Development;*
- *create and enhance field drain habitats to compensate for temporary and permanent losses of drain habitat to the Proposed Development, and to incidentally benefit aquatic biodiversity including water vole;*
- *enhance the riparian zone of the Hatfield Waste Drain and South Soak Drain for aquatic wildlife, birds, pollinators and other species;*
- *enhance grassland habitats for the benefits of pollinators and other invertebrates, birds, badger, brown hare and other species;*
- *provide nesting and roosting features for birds and bats to address a general lack of natural features in the local area to meet this need; and*
- *enhance the habitat and green infrastructure network adjacent to and through the Site, including provisions of habitats connected to Stainforth and Keadby Canal Corridor LWS and Hatfield Waste Drain LWS. With the improvement of the former LWS habitat corridor directly connecting to and also complementing the undesignated former Keadby Ash Tip, another site of biodiversity importance.”*

9.26 These aims are welcomed. Furthermore, the proposals for the willow copse species mix, broadleaved woodland creation mix, individual trees, mixed scrub and grassland on clay soils are acceptable and generally locally

appropriate. The proposed species features (OLBMEP Section 5.2.65) are also acceptable.

9.27 Section D.3.28 of the submitted OLBMEP sets out the following approach to assigning strategic significance to habitats in the statutory biodiversity metric:

“To determine the strategic significance of sites and habitats, the local plans, strategy and policy documents detailed in Section 2.3. of the Outline LBMEP Report were reviewed. As a Local Nature Recovery Strategy (LNRS) has not been published, the following habitats were assigned high strategic significance:

- *priority habitats identified in the Lincolnshire BAP and/or Section 41 of the NERC Act;*
- *habitats with nature conservation designations;*
- *habitats covered by green infrastructure and biodiversity opportunity mapping designations as shown on a map produced for the withdrawn North Lincolnshire Local Plan Publication Plan October 2021 (whilst this plan has been withdrawn, this map is still available online and is the only plan identified that maps green infrastructure); and*
- *other habitats named in Local Plan policies with objectives for retention and creation i.e. woodland.”*

9.28 This approach is not correct. Instead, the approach should follow Table 8 of the Statutory Metric User Guide. Only habitat actions that have been mapped or are described as ecologically important in a **specific location**, in a relevant plan should be ascribed high strategic significance (emphasis added).

- 9.29 At present, a marginal biodiversity net gain (BNG) is proposed: +10.8% in relation to habitats and +10.04% in relation to watercourses. Thus, any slight underperformance compared to the OLBMEP would result in watercourses BNG of less than 10%. Errors in ascribing strategic significance to habitats could also lead to a reduced net gain. However, it is acknowledged that mandatory net gain is not yet applicable to DCO projects.
- 9.30 Set against these concerns, it is acknowledged that the Applicant has made some precautionary assumptions in the metric as set out in Section D.3.41 of the OLBMEP [APP-161]. When a final metric is submitted to discharge proposed DCO Requirement 6 [AS-003], this may increase the probability of the applicant being able to deliver a biodiversity net gain of at least 10%.
- 9.31 The OLBMEP sets out the Applicant's intention to manage and monitor retained, created and enhanced habitats for at least 25 years, as opposed to 30 years as required for mandatory BNG. Either way, there will be a significant monitoring need over a long period of time. In common with other Local Planning Authorities, North Lincolnshire Council seeks to agree planning obligations with developers to secure monitoring fees to cover the reasonable costs of assessing monitoring reports, agreeing any necessary remedial measures and carrying out any site visits required. Our fee charging structure is being finalised at the time of writing.

10. CULTURAL HERITAGE

- 10.1 The most relevant extant development plan policies against which to assess the proposed development's effect upon heritage assets are Policy DS1 of the NLLP, which requires adequate measures to ensure no unacceptable impacts on archaeological remains in all new development; and Policy CS6 of the Core Strategy which states that developments must respect and enhance the local character and distinctiveness of the area in which it would be situated.

- 10.2 The Council has assessed the submitted information concerning the assessment of potential effects of the proposed development on heritage assets. This is set out in ES Chapter 15 [APP-049].
- 10.3 Numerous discussions have taken place between the Applicant and the Council's Historic Environment Officer (HEO) both in relation to the previous Keadby 3 DCO project/application and in respect of the proposed development. The Applicant has taken on board the advice of the HEO and the assessment of cultural heritage that has been undertaken is agreed to be suitable and proportionate.
- 10.4 The scheme of archaeological mitigation, in the form of geoarchaeological analysis and reporting, and archaeological monitoring during groundworks within specified areas of the Proposed Development has been agreed with the Applicant and is considered to be appropriate.
- 10.5 The scope of the geoarchaeological analysis and reporting, and archaeological monitoring is set out in the submitted Outline Written Scheme of Investigation [APP-169], which has been reviewed and agreed as acceptable by the Council's HEO.
- 10.6 The impacts of the Proposed Development on the setting of heritage assets, will be mitigated as far as reasonably practicable through detailed design. Matters including 'siting, layout, scale and external appearance, including the colour, materials and surface finishes of all new permanent buildings and structures' are proposed to be secured by Requirement 15 of the Draft DCO [AS-003].
- 10.7 Given the siting of the proposed development within the existing Keadby Power Station Site, adjacent to the operational Keadby 1 and Keadby 2 power stations it is considered that there will be no significant impact on the setting of the nearby listed structures.

11. NOISE AND VIBRATION

- 11.1 The most relevant development plan policies against which to assess the proposed development's effect upon noise and vibration are Policy RD2 of the NLLP, which seeks to prevent development in the open countryside that would be detrimental to residential amenity; Policy DS1 of the NLLP, which requires that new developments do not result in unacceptable loss of amenity to neighbouring land uses; and Policy DS11 of the NLLP, which requires that developments do not create environmental conditions likely to affect nearby developments and adjacent areas.
- 11.2 The Council has assessed the submitted information concerning the assessment of potential effects of the proposed development in respect of noise and vibration. This is set out in ES Chapter 9 [AS-013].
- 11.3 This Chapter assesses impacts on Noise Sensitive Receptors (NSRs) during the construction, operation (including maintenance) and decommissioning of the proposed development. In particular, the assessment considers:
- Existing and future baseline conditions;
 - The effects of construction of the proposed development on NSR during the site clearance and construction works including predicted changes in road traffic noise levels on the local road network;
 - The effects of noise and vibration resulting from operation of the proposed development;
 - The effects of noise and vibration resulting from decommissioning of the proposed development.
- 11.4 The assessment has identified no more than negligible / minor adverse (not significant) impacts at all residential noise sensitive receptors (NSR's) for construction works during daytime and Saturday morning working hours. If

construction activities are required during evening or night-time periods, levels in excess of the Significant Observed Adverse Effect level (SOAEL) could occur at all NSR's, if the activities undertaken and intensity of working are comparable to daytime works. This could result in significant noise effects in the absence of additional mitigation. Measures are therefore proposed to be put in place to control or restrict activities during evenings and at night so as not to exceed the SOAEL or relevant noise limit to be agreed. By timing construction works and avoiding noisier activities outside core working hours, significant adverse effects can be avoided.

- 11.5 An Outline Construction Environmental Management Plan has been submitted which is detailed in nature and includes information on the control of construction noise and vibration. Furthermore, to assist in the preparation of the final CEMP, a detailed noise and vibration assessment will be undertaken once the contractor is appointed and further details of construction methods are known, in order to identify specific mitigation measures.
- 11.6 Controls in relation to construction noise and vibration are secured by Requirement 25 in the Draft DCO [AS-003] which has been reviewed and agreed by the Council's Environmental Protection Officer.
- 11.7 The final design of the Proposed Development is yet to be determined. Therefore, noise modelling has been undertaken based upon the indicative locations of operational equipment.
- 11.8 The worst-case operational specific sound levels without mitigation are detailed in Table 9.21. A BS4142 assessment has then been undertaken in relation to both day and nighttime noise impacts, with an additional 3dB acoustic correction applied for any 'other distinctive character'. The initial results presented in Table 9.23 and 9.24 produce a range of impact magnitudes from very low to high and effects between not significant to significant, subject to consideration of context.

- 11.9 The assessment has therefore considered further mitigation; this will focus on attenuation options for the modelled sources that make the largest contribution to the specific sound level. Residual effects after mitigation are described in Section 9.9 and are 'not significant'.
- 11.10 Furthermore, the draft DCO contains a Requirement (no. 26) for the operation of the authorised development to be no greater than +3dB higher than the defined representative background sound level during each of the daytime and night-time periods. The Council finds this approach acceptable.
- 11.11 In conclusion the Council is satisfied with the information contained in the ES with regard to noise and vibration and has no concerns to raise in this regard subject to the imposition of the recommended Requirements 25 and 26 referenced above.

12. AIR QUALITY

- 12.1 The most relevant development plan policies against which to assess the proposed development's effect upon air quality are Policy DS1 of the NLLP, which requires that development proposals do not result in pollution of air, water or land and Policy DS11 of the NLLP, which seeks to prevent development that would result in dangerous levels of polluting emissions.
- 12.2 The Council has assessed the submitted information concerning the assessment of potential effects of the proposed development in respect of air quality. This is set out in ES Chapter 8 [APP-042].
- 12.3 The Air Quality Assessments [APP-061 & APP-062] have considered the following potential impacts in relation to air quality:

- dust generation during construction;

- emissions from road traffic and Non-Road Mobile Machinery (NRMM) during construction;
- construction and operational phase road traffic emissions;
- process emissions from the operational phase of the Proposed Development; and
- the potential effects of the eventual decommissioning of the Proposed Development.

12.4 The purpose of the construction dust assessment is to determine the potential risk of dust impacts occurring at sensitive receptors due to construction related activities. In addition, the assessment is undertaken to identify the level of mitigation required in order to avoid potential impacts. It is considered that with the implementation of appropriate mitigation and control measures set out in the Outline Construction and Environmental Management Plan (CEMP) [APP-166], the potential effect from fugitive emissions of construction dust would not be significant.

12.5 For the construction traffic assessment, dispersion modelling has been used to predict road pollutant concentrations at sensitive receptors as a result of the IAQM screening criteria being fulfilled. The assessment concludes that the impact at all human receptors can be considered negligible as both the change between the Do Minimum and Do Something scenarios for all receptors is less than 1% of the Air Quality Assessment Level (AQAL); and all receptors are below 75% of the AQAL. It is concluded that the effect of changes in traffic flows due to construction traffic on human health is negligible and not significant.

12.6 The assessment of emissions from construction site plant identified no sensitive human receptors within 200m of the Main Site, however there are a number close to the Water Connection Corridors, Waterborne Transport Off-loading Area, Construction Access Route and the Biodiversity Mitigation area. As works within these areas will be phased, NRMM and site plant will only be required to be operational at that nearest location for a limited duration over

the overall construction period, and only operational on an 'as and when required' basis during that particular phase. Emissions from site plant and NRMM will also be controlled by measures set out in the Outline CEMP, to reduce emissions associated with this source, including restriction of their operation within designated areas only, prohibiting of idling, the enforcement a minimum engine emissions standard and enforcement of maximum site speed limits. Due to these proposed controls, it is considered that the potential for NRMM emissions within the site to result in air quality impacts on local human health receptors is considered negligible.

12.7 The assessment has considered the impact of the operational process emissions on local air quality. The assessment has used the dispersion modelling, which includes a number of conservative assumptions in combination, including:

- the operational proposed development has been assumed to operate on a continuous basis i.e. for 8,760 hour per year, although in practice the plant would require routine maintenance periods meaning that actual operation would be less than this;
- the operational proposed development has been assumed to operate at full load; however, this will not always be the case;
- reporting of the worst-case results from the five years of meteorological data modelled, other years therefore result in lower impacts;
- maximum building sizes within the assessed Rochdale Envelope;
- operation of the plant at proposed emission limits, or maximum concentrations provided by all technology providers, when annual average emissions are likely to be below these;
- presentation of the worst-case impacts from assessment of firing on 100% natural gas or 100% hydrogen; and,

- conservative estimates of background concentrations for the commencement of operation at the receptor locations.

- 12.8 The development would be regulated in accordance with an Environmental Permit, issued by the Environment Agency. The development would therefore be regulated in accordance with the IED and Best Available Technique (BAT) Reference documents (BREF) for this sector. The Environment Agency would set specific emission limits in the Environmental Permit based on the BAT-associated emission levels (BAT-AEL). For all emissions modelled, the maximum permitted emission limit concentrations set within the Environmental Permitting Regime have been used to represent a worst-case assessment.
- 12.9 The assessment concludes that the impacts of all pollutant species released from the operational proposed development are predicted to result in negligible adverse effects at all receptors within the study area. The impact of NO₂, CO, NH₃ can therefore be considered to be not significant at all human health receptors.
- 12.10 An assessment of cumulative impacts with other proposed developments has also been undertaken in Chapter 21 of the ES [APP-055] and indicates that there are unlikely to be any developments that could result in significant cumulative effects with the Proposed Development.
- 12.11 The predicted air quality effects of eventual decommissioning of the proposed development are considered to be comparable to, or less than, those assessed for construction activities i.e. not significant. This is based upon the assumption that groundwork, traffic movements and site work likely to be required to decommission the proposed development would be less than that required for its construction. Appropriate best practice mitigation measures will be applied during any decommissioning works and documented in a Decommissioning Environmental Management Plan (DEMP).

12.12 The Applicant has submitted an Outline CEMP [APP166]. The final CEMP will be produced by the contractor appointed by the Applicant to undertake the construction of the Proposed Development. The submission, approval and implementation of this will be secured through Requirement 16 of the Draft DCO. The Outline CEMP submitted provides generic control techniques, which are considered acceptable at this stage; further details will be supplied as part of the final CEMP, which will be reviewed and agreed at the discharge of Requirement 16 stage.

12.11 The Council is satisfied with the information contained in the ES with regard to air quality and have no concerns to raise in this regard.

13. LAND CONTAMINATION

13.1 The most relevant development plan policies against which to assess the proposed development's effect in respect of land contamination is Policy DS7 of the NLLP, which requires that, for proposals on land known or suspected to be contaminated, contamination can be overcome by remedial measures or improvements and Policy DS1 of the NLLP, which requires that no pollution of water, air or land should result which poses a danger or creates detrimental environmental conditions.

13.2 The Council has assessed the submitted information concerning the assessment of potential effects of the proposed development in respect of contaminated land. This is set out in ES Chapter 13 [APP-047].

13.3 The Phase 1 Desk Based Assessment Report (Appendix 13A, Annex 2) [APP-077] confirms that the application site covers an area of approximately 77.1ha and is currently occupied by the following:

- Keadby Power Station, including numerous above ground tanks in the central/ eastern area;

- A large 400kV electricity substation operated by National Grid in the northern area;
- Predominantly open land in the west (Keadby Common) including areas of former agricultural land (used by the Keadby 2 Power Station construction project as lay-down and temporary spoil storage) with further open land on the eastern spurs (proposed Water Connection Corridor); and
- A pumping station and residential housing located on the eastern-most extent of the eastern spur and a pumping station is also located on the north-eastern spur.

13.4 The proposed site is situated on former agricultural land associated with Keadby Common and lies north and north-west of the Keadby 2 Laydown Area. A site walkover was undertaken by AECOM during July 2020. The Phase 1 also includes a review of previous site reports that have been undertaken relating to the proposed development site and surrounding area.

13.5 Based on the current review of all the data, the conceptual site model confirms that there is a potential risk for contaminants to be present in the ground.

13.6 A qualitative assessment of the risks posed by land contamination within the study area has been undertaken and a baseline risk score has been produced for each potential risk identified. The areas with a baseline risk score of three and above have been considered for further risk and impact assessment and those with a baseline risk score of two or below are not considered to pose an unacceptable risk for the proposed development construction or operation and have therefore been scoped out.

13.7 The recommendation is for a ground investigation to be undertaken, paragraph 13.6.3 of the Phase 1 confirms that the ground investigation will be undertaken before construction to inform the development of the detailed design. The ground investigation will be designed to target the potentially

contaminative sources identified, including the historical landfilling activities identified on the site. Based on the findings of the investigation, where the risks are deemed to be unacceptable, a further detailed quantitative risk assessment and if required, detailed remediation strategies will be provided.

- 13.8 The Council's Environmental Health Officer considers the Phase 1 investigation and its conclusions acceptable subject to the findings of the intrusive site investigation. This is proposed to be secured via Requirement 14 in the Draft DCO [AS-003], which is appropriate.

14. LIGHT

- 14.1 The most relevant development plan policies against which to assess the proposed development's effect with regard to artificial lighting are Policy RD2 of the NLLP, which requires that new developments in the open countryside are not detrimental to residential amenity; Policy DS1 of the NLLP, which requires no unacceptable loss of amenity to neighbouring land uses from all new developments; and Policy DS11 of the NLLP, which requires that new developments do not create environmental conditions likely to affect nearby developments and adjacent areas.
- 14.2 The Council has assessed the Outline Lighting Strategy Rev 1 [AS-012]. The Strategy sets out the outline lighting requirements at the proposed development site during both construction and operational phases. The Strategy also identifies potential measures and guidance that may be taken to control obtrusive light through the detailed design of the proposed development lighting scheme and management of lighting used during the construction phase.
- 14.3 The Strategy makes reference to the Guidance Notes for the Reduction of Obtrusive Light' (GN01/21) produced by the Institute of Lighting Professionals. Furthermore, the site is categorised as being within Environmental Zone E2 (rural, low district brightness) which the Council would agree with.

- 14.4 Requirement 7 of the Draft DCO [AS-003] requires a detailed lighting scheme to be submitted and agreed for both the construction and operational phases of the development.
- 14.5 Subject to an appropriate lighting scheme being produced to satisfy Requirement 7 it is considered that potential light impacts from the development will be adequately mitigated.

15. HYDROLOGY AND FLOOD RISK

- 15.1 The relevant development plan policies against which to assess the proposed development's effect upon the water environment are NLLP Policy DS11, which states that development will only be permitted where it can be demonstrated that levels of potentially polluting emissions do not pose a danger or result in adverse environmental conditions, NLLP Policy DS14, which requires the satisfactory provision to be made for the disposal of foul and surface water; and NLLP Policy DS15, which states that developments will not be permitted if they *"adversely affect the quality and quantity of water resources...unless the impact is mitigated to an acceptable level"*. NLLP Policies DS16 and CS19 are also relevant and seek to avoid areas of current or future flood risk and prevent increased risk of flooding as a result of new development.
- 15.2 The Council has assessed the submitted information concerning the assessment of potential effects of the proposed development in respect of flood risk and drainage. This is set out in ES Chapter 12 [APP-046]).
- 15.3 The submitted Flood Risk Assessment (FRA) Rev 1 [AS-015] and Outline Drainage Strategy (Annex 3 of the FRA) is considered to be acceptable in that it identifies pluvial flood risk and provides for various mitigation measures to be addressed in the detailed surface water drainage strategy.
- 15.4 Draft DCO Requirement 11 [As-003] necessitates the submission and agreement of the detailed surface water drainage strategy. The Council is

satisfied that subject to the acceptable discharge of this requirement the impact of the proposals on flood risk and drainage will be adequately mitigated.

16. SOCIO-ECONOMIC IMPACT

- 16.1 The Council has assessed the submitted information concerning the assessment of potential effects of the proposed development in respect of socio-economics. This is set out in ES Chapter 16 [APP-050].
- 16.2 The Council is satisfied that the approach to the assessment of socio-economic impacts presented in Chapter 16 is robust. The methodology used to determine the impact of the project is clear and helpful, indicating levels that can be easily measured. The data and statistics are relevant and appropriate.
- 16.3 From previous delivery of large-scale projects in the area the Council agree that it is realistic that there will be a major short-term positive impact on employment created during the construction phase of the proposed development. It is understood that these will be temporary jobs and the Council concur that a proportion of these jobs will be drawn from outside of the local area. The operational jobs created, although much lower in numbers, will have a minor positive long-term impact on the area.
- 16.4 Both temporary and permanent jobs generated by the development will result in additional spend to the area through accommodation, leisure use and local shops/services as well as the potential for additional work given to local supply chain companies. Although a minor impact, local companies may also secure long-term contracts once the facility is operational.
- 16.5 The proposed development has the potential to support further growth of the construction and energy sectors in North Lincolnshire. In addition to the value added GVA, it would provide an opportunity to address highlighted skills shortages in this key sector (highlighted in local and regional Industrial

Strategies), therefore positively influencing the ability to attract and retain skilled workers over the lifetime of the proposed development. The skills and experience gained and developed for businesses and workers, has the potential to lead to opportunities with any future local developments. This will be further supported by Draft DCO Requirement 36 [AS-003], which secures the submission and implementation of an Employment, skills and training plan. It is agreed that this provides an appropriate mechanism to promote employment, skills and training opportunities during construction and employment opportunities during operation for local residents.

- 16.6 The energy sector has been identified as a key growth sector across the Humber and the Greater Lincolnshire regions. This sector is identified in the North Lincolnshire Economic Growth Plan as a growth sector within the area.
- 16.7 The proposed development is in an area of current industrial activity and is not considered to have an adverse impact on the visitor economy of North Lincolnshire.

17. CONCLUSION

- 17.1 National guidance on Local Impact Reports recommends that a view is given by the local planning authority of the relative importance of different social, environmental or economic issues and impacts of the scheme on them.
- 17.2 Short term and negative social and environmental impacts are anticipated. Such impacts include increased traffic generation, construction disturbance and increased emissions. Longer term adverse impacts include the visual intrusion caused by the buildings and structures. North Lincolnshire Council are of the view that via the implementation of impact avoidance, design and mitigation measures that will be secured through Requirements contained within the Draft DCO [AS-003] and through other regulatory regimes that these negative impacts will not be significant.

- 17.3 The proposed development will have short-term and long-term beneficial economic impacts in terms of job creation and inward investment into North Lincolnshire. Through the proposed DCO Requirements the proposed development will also provide an opportunity to address highlighted skill shortages in a key sector strategically promoted for growth by the Council in this area. These beneficial impacts are considered to be of moderate importance.
- 17.4 The Council also considers that the proposed development would provide a positive impact in terms of low carbon electricity generation, which will help to deliver carbon reduction policies set out in the NPPF, UK Clean Growth Strategy, Environment Act, Humber Clean Growth Local White Paper and the North Lincolnshire Core Strategy. The proposed development could contribute to a reduction in the carbon emissions of the energy supply in the UK and provide a secure and stable energy source. The Council believes that this is a significant positive impact but that it has to be balanced against the potential environmental impacts of the proposed development.
- 17.5 Finally the Council believes that the proposed development, if approved could help stimulate the wider hydrogen economy, which is emerging as a potential key sector within North Lincolnshire given the proximity of heavy industry and linkages to renewable energy. The Council is aware of a number of potential developments associated with the production and transmission of hydrogen locally, including the East Coast Hydrogen project and the Humber Hydrogen Pipeline project. Furthermore, the Council is currently in the process of determining an application (PA/2025/1146) by Uniper Hydrogen UK Ltd for a green hydrogen production facility with installed electrolyser capacity of 120MW at the site of Killingholme Power Station on the South Humber Bank, which is expected to be determined within the current examination period. It is considered that the proposed development could act as a catalyst to drive further development in this emerging sector.

