

Your Ref EN0110001

Our Ref IPP-229

Wednesday 24 February 2026

Proposal: EN0110001 Keadby Next Generation Power Station Project.

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

Comments on Additional Information/Submissions received at Deadline 1

### Summary of Applicant's Oral Submissions at Issue Specific Hearing (ISH) 1

Further to the Trust's relevant representation and oral submissions at Issues Specific Hearing 1, we have reviewed the content of the Summary of Applicant's Oral Submissions at Issue Specific Hearing 1, and wish to provide further comment.

#### Impact of the construction of Abstraction Units (notably, rights sought for land parcels 3-163 and 3-164)

The applicant's summary highlights correctly that, to maintain safe navigation of the canal without closures, the CRT requires navigable width of 20m to allow for safe boat passage (paragraph 6.4).

The Trust's primary concern is that powers are being sought for land to the south of the proposed cofferdam location (for land parcels 3-163 and 3-164) that would allow for the closure of this part of the canal to navigational traffic under Article 19 of the draft DCO (AS-003), which would effectively close the canal to navigable traffic at any time at limited notice to the Trust.

The land affected is in excess of land where powers were sought for the previously approved Keadby 3 Project, where no powers to restrict the navigable width of the canal to below 20m were sought.

Paragraph 6.5 of the applicant's summary highlights that they believe that Part 3 of Schedule 9 to the dDCO, which sets out protective provisions (PPs) in favour of the CRT which provide adequate safeguards to the CRT and its interests.

At present, the Protective Provisions "For the protection of the Canal & River Trust" at Schedule 9, Part 3 of the draft Order (AS-003) **do not reflect the Trust's required form of protective provisions and crucially include caveats that could limit the Trust's ability to resist powers to restrict passage on the Stainforth & Keadby Canal.** For example, although paragraph 32 (4) states that the undertaker must not exercise the powers conferred by the Order to temporarily interfere with the waterway under article 19 without the Trust's prior consent, part (7) states that the consent of the Trust must not be unreasonably withheld or delayed. Inadequate definitions exist in the Order to define under what circumstances any decline in consent would be considered unreasonable and we have significant concern that the existing draft, in effect, gives the Trust little power to guarantee safe navigation on the canal.

### Canal & River Trust

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Amendments to Requirement 22(3)(c) at Schedule 2 to the draft DCO (AS-003) are also likely to be insufficient, as the final consent for the Construction Environmental Management Plan would be given by the Local Planning Authority, and not the Trust.

Paragraph 6.5 highlights that the applicant explained that they considered that ES Appendix 12C Navigational Risk Assessment (APP-075) showed how the Applicant has taken the required steps to assess the risk of the cofferdam works. It was highlighted that the cofferdam works were considered as being low risk.

Our review of the Navigational Risk Assessment (APP-075) highlights that an error has been made in the assessment of the impact of the cofferdam works. Page 36 states that “on the basis of the limited ingress into the Canal (up to 20m for the total working area), it is considered that the navigable area between the southernmost extent of the cofferdam and the opposite bank of the Stainforth and Keadby Canal would be adequate to allow safe passage of vessels”. **We wish to highlight that a land take of 20m ingress into the canal would leave insufficient space for safe navigation.** As such, the conclusion of the Risk Assessment on this matter may likely be inaccurate.

#### Impact of the use of Railway Wharf on Keadby Lock

The applicant’s comments in paragraph 6.4 highlights the Trust’s comment that the risk of risk of unplanned obstructions to access to the Stainforth & Keadby Canal caused by vessels arriving at Railway Wharf outside of agreed times has not been addressed in the Navigational Risk Assessment (APP-075)

Whilst paragraph 6.5 states that the Navigational Risk Assessment (APP-075), in their view, assesses the risk of abnormal invisible load (AIL) movements, we have significant concern that the risk assessment does not include reference to the risk of AIL movements restricting access to Keadby Lock. Without reference to this, we do question the assertion in paragraph 6.5 that the assessment shows that, post mitigation, no risk identified goes above 0.2. The Trent is tidal, and smaller vessels accessing the canal can only navigate safely on the River at specific tidal times. Any unexpected closure of the access to the lock could result in vessels being stranded on the River Trent, with insufficient time to find safe berth before the tides change.

As explained previously by the Trust, during the construction of the Keadby 2 project, vessels arriving at Railway Wharf did often arrive outside of times previously approved by the Trust, with new notice given at very short notice that would not allow the Trust to forewarn boats of this hazard.

Although paragraph 6.3.1 highlights that Requirement 22(3)(c) at Schedule 2 to the dDCO (AS-003), which would allow a Navigational Risk Assessment to be provided prior to the commencement of the use of Railway Wharf, the Trust do consider that this risk could be dealt with more effectively if principles of procedures to prevent and/or minimise unplanned obstructions to Keadby Lock are identified beforehand. This would help prevent a circumstance arising where an acceptable solution cannot be identified when it comes to discharging the requirement.

### **Summary of Applicant’s Oral Submissions at Compulsory Acquisition Hearing (CAH) 1**

#### 6. Statutory Undertakers Land

Paragraph 6.2 highlights that Freehold acquisition of Trust land is required, associated with the pumping station.

We wish to highlight that, although paragraph 6.2 from the applicant states that Heads of Terms (HoTs) have been issued to the Trust, we were chasing the applicant’s agent (TLT) for an undertaking to allow for negotiations to commence at the time. This was received only in mid-February 2026.

Draft Heads of Terms and plans were provided to the Trust, and were provided in February 2026. This was not issued in November 2025 as described in the Applicant’s Oral Submission.

We do wish to work positively with the applicant on this matter, and are aiming to commence negotiations shortly based on the information recently provided.

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

#### **Canal & River Trust**

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Yours sincerely,

  
Area Planner

  
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