

Planning Inspectorate ,

Reference: OR-0002257/01

Customer reference: EN0110001

08 May 2026

The Keadby Next Generation Power Station Deadline 4: Comments on documents submitted at Deadline 3

Dear Sir,

This response constitutes the Environment Agency's Deadline 2 submission.

We have reviewed the Deadline 3 submissions, including:

- REP3-003 – Draft Development Consent Order
- REP3-020 - Water Environment Water Framework Directive Regulations Assessment
- REP3-022 - Outline Construction Environmental Management Plan
- REP3-024 – Applicant's response to ExA Written Questions
- REP3-025 – Applicant's comments on D2 submissions

Regarding [REP3-003] – Draft Development Consent Order:

The Environment Agency considers that using the term 'substantially' in a Requirement results in a lack of precision and renders it difficult to enforce. We request the removal of the term 'substantially' from affected Requirements where we are a named consultee i.e Requirements 11,12,13,14, 16, 27.

Regarding Environment Agency Relevant Representations [RR-006]:

With reference to our remaining unresolved issues our comments are as follows:

EA008 – Resolved. We are satisfied that [REP3-020] WFD assessment does now specifically mention landfills.

EA009 – Resolved. We are satisfied with the updates to [REP3-022] oCEMP Table 7 (Geology, Hydrogeology and Land Contamination). Under the heading "Ground Investigation", the applicant has clarified the scope of additional groundwater monitoring completed to date. Reference to further works in Chapter 13 has been changed and is now suitable. Under the heading "Construction Mitigation", they have added acknowledgement of "additional ground investigation work" being required.

EA016 – Resolved. We are satisfied with the additions made to [REP3-022] sections C.4.15-C.4.20 in Appendix C Outline Water Management Plan in. We do note that neither section 2.5 nor Table 8 in the main CEMP contain updates, so we would encourage the Applicant to make reference to this Appendix, however, we are satisfied to mark it as resolved.

EA017: Unresolved. We acknowledge the update to Table 8 in REP3-022 which states that water quality monitoring which be undertaken for a “short duration post-construction”. However, we feel that a ‘short duration’ is too limited. Furthermore, section C.9.4 has still not been updated to include any more information about suggested methodology, frequency or locations of water quality monitoring. In our Relevant Representations [RR-006] and comments at Deadline 2 [REP2-009] we were clear that if water quality monitoring is not appropriate then a suitable baseline of water quality data may not be captured, and any trends in water quality deterioration or improvement as a result of the project may not be understood. The frequency should occur at least monthly, starting at least six months pre-construction, and the locations should be upstream and downstream of any water crossings or discharges. Methods should include the use of hand-held devices for in-situ measurements, and samples collected by UKAS accredited methods to be sent to a laboratory, in addition to visual inspections. We have concerns that C.9.4 still only says what monitoring plans are ‘likely’ to comprise of.

EA018: Resolved The updates to Table 8 and C.4.6 of the oCEMP [REP3-022] satisfactorily address our concerns regarding mitigation measures for fuel and chemical storage.

EA021: Resolved. We are satisfied with the updated wording in oCEMP [REP3-022] Table 5 regarding mink control measures.

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Yours sincerely,

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Nlteam@environment-agency.gov.uk

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