
To:

Our Ref: EN0110001

Environment Agency
Keadby Next Generation Limited
National Gas Transmission plc
National Grid Electricity Transmission plc
Network Rail Infrastructure Limited
Northern Powergrid (Yorkshire) plc
PD Ports Properties Limited
The Crown Estate

4 September 2026

Dear Sir or Madam,

Planning Act 2008 and The Infrastructure Planning (Examination Procedure) Rules 2010

Application by Keadby Next Generation Limited (“the Applicant”) for an Order granting Development Consent for the proposed Keadby Next Generation Power Station Project (“the Proposed Development”)

REQUEST FOR INFORMATION

1. Following the completion of the Examination on 19 June 2026, the Examining Authority submitted a Report and Recommendation in respect of its findings and conclusions on the above application to the Secretary of State on 6 August 2026. In accordance with section 107 of the Planning Act 2008, the Secretary of State has three months to determine the application.
2. There are matters on which the Secretary of State would be grateful if the Applicant, Environment Agency, National Gas Transmission plc, National Grid Electricity Transmission plc, Network Rail Infrastructure Limited, Northern Powergrid (Yorkshire) plc, PD Ports Properties Limited and The Crown Estate could provide updates or information as appropriate.

Hydrogen Connection Statement

3. Noting the information provided in the Hydrogen Connection Statement [APP-164] and [REP2-005], the **Applicant** is requested to provide an update on any progress made towards identifying and securing a potential hydrogen connection point

through National Gas Transmission's Project Union, or any other means, including any relevant discussions, agreements, timescales or dependencies.

Climate Change Assessment

4. The Secretary of State notes that Chapter 18 of the ES [APP-052] assumes that hydrogen supplied to the Proposed Development has a lifecycle carbon intensity of 20 gCO₂e/MJLHV which is the maximum level that qualifies as "low carbon hydrogen" under the Low Carbon Hydrogen Standard ("LCHS"). However, this is not secured within the DCO.
5. In the absence of a mechanism securing compliance with that intensity the **Applicant** is requested to:
 - a) Confirm whether hydrogen with a lifecycle carbon intensity exceeding 20 gCO₂e/MJLHV could be supplied to and used by the Proposed Development;
 - b) If so, whether the greenhouse gas emissions assessed for Scenarios A-F in Chapter 18 of the ES would remain representative of those scenarios, or whether revised emissions estimates would be required; and
 - c) Whether Scenario G (i.e. operation of the Proposed Development on 100% unabated natural gas throughout its operational life) would still represent the worst-case scenario for greenhouse gas emissions. If not, the Applicant should identify the revised worst-case scenario and quantify the associated greenhouse gas emissions.
6. The **Applicant** is requested to provide further detail on how it intends to work with hydrogen producers and transmission operators to support the assumption that LCHS-compliant hydrogen will be procured throughout the lifetime of the Proposed Development.
7. The **Applicant** is requested to provide without-prejudice proposed drafting for a DCO requirement that would secure that the hydrogen supplied to the Proposed Development has a lifecycle carbon intensity of no more than 20 gCO₂e/MJLHV.
8. The Secretary of State notes Chapter 18 of the ES assumes operating hours of 3,500 hours for the first 15 years of operation, and 1,500 hours thereafter for the Proposed Development [APP-052 - 18.6.19]. The **Applicant** is requested to:
 - a) Explain the basis for the assumed operating hours, including why it represents a worst-case scenario;
 - b) Identify whether the assumed operating hours would be secured through the DCO, environmental permit or any other mechanism, and specify the relevant provisions; and

- c) If the operating hours would not be subject to an enforceable limit, explain what would prevent the Proposed Development from operating for longer than assessed and quantify the greenhouse gas emissions that could arise under a higher utilisation worst-case scenario.
9. The **Environment Agency** is requested to confirm whether the environmental permit (or any other consent, licence or permit that the Environment Agency may grant for the Proposed Development) would impose, or could impose, any restriction on the annual operating hours of the Proposed Development.

Carbon Capture Requirements

10. The Secretary of State notes that Scenario G assumes 25 years of unabated natural gas operation and Requirements 30 and 31 of the dDCO do not appear to require the installation or operation of carbon dioxide capture and compression infrastructure before the Proposed Development is operational, a noted difference compared to the consented Keadby 3 Carbon Capture Power Station.
11. The **Applicant** and **Environment Agency** are therefore requested to explain whether there is any regulatory, consenting or other mechanism that would trigger the deployment of carbon dioxide capture and compression infrastructure during the operational life of the Proposed Development. Where such a mechanism exists, the **Applicant** should identify circumstances in which it would apply and explain what further consents or approvals would be required, including the relationship, if any, with The Keadby 3 (Carbon Capture Equipped Gas Fired Generating Station) Order 2022.
12. The **Environment Agency** is also requested to comment on the sufficiency of the Applicant's Carbon Capture Readiness Statement [APP-160] including the Applicant's technical and economic feasibility assessments and the suitability of the space set aside on the site for carbon dioxide capture and compression infrastructure should the Proposed Development need to run on natural gas for any length of time during its operation.

Air Quality

13. The Secretary of State notes that ES Chapter 8 Air Quality [REP3-011] and Appendix 8B Air Quality Operational Assessment [REP3-017 – 8B.2.11] considers that 'Selective Catalytic Reduction' ("SCR") may be required to ensure NO_x emissions are compliant with the relevant emissions limits. The **Applicant** and the **Environment Agency** are requested to identify how the trigger for the installation and operation of SCR is secured. If no such mechanism is currently secured, the Applicant should provide without-prejudice proposed drafting for a DCO requirement that would secure the implementation of SCR where necessary to achieve compliance with the relevant emission limits.

Biodiversity Net Gain

14. The **Applicant** is requested to provide comments on the following addition relating to requirement 6 Landscape and Biodiversity Management and Enhancement Plan:

(2) The plan submitted and approved pursuant to sub-paragraph (1) must include details of—

(g) a biodiversity net gain strategy in accordance with Appendix D of the outline landscape and biodiversity management and enhancement plan report and must demonstrate how a minimum biodiversity net gain of 10% for area habitat units, 30% for hedgerow units and 10% for watercourse units, calculated using the Department of Environment Food and Rural Affairs' Statutory Biodiversity Metric (February 2024), or if this is withdrawn or replaced, a biodiversity metric approved by the local planning authority in consultation with the relevant statutory nature conservation body, will be delivered.

Land Rights and Protective Provisions

15. The **Applicant** and **PD Ports Properties Limited** are requested to provide updates on any agreement of Heads of Terms in respect of a voluntary land agreement. If agreement has not been reached, provide the reasons why, and when agreement is expected to be reached. **PD Ports Properties Limited** are also requested to comment on the Applicant's proposed protective provisions in [REP6-009].
16. The **Applicant** and **National Grid Electricity Transmission plc** are requested to provide updates on whether protective provisions have been agreed. If agreement has not been reached, provide the reasons why, and when agreement is expected to be reached.
17. The **Applicant** and **National Gas Transmission plc** are requested to provide updates on whether protective provisions have been agreed. If agreement has not been reached, provide the reasons why, and when agreement is expected to be reached.
18. The **Applicant** and **Network Rail Infrastructure Limited** are requested to provide updates on whether protective provisions have been agreed. If agreement has not been reached, provide the reasons why, and when agreement is expected to be reached.
19. The **Applicant** and **Northern Powergrid (Yorkshire) plc** are requested to provide updates on whether protective provisions have been agreed. If agreement has not been reached, provide the reasons why, and when agreement is expected to be reached.
20. The **Applicant** is requested to provide an update on the progress of agreeing Heads of Terms with Andrew Severn.

21. The **Applicant** is requested to provide an update on the progress of agreeing Heads of Terms with Richard Strawson.
22. The **Applicant** is requested to provide an update on progress made to establish ownership or persons benefitting from rights in, on or over land with regards to unregistered land plots.
23. The **Applicant** is requested to provide any further updates regarding land rights agreements.

Crown Land

24. The **Applicant** and **The Crown Estate** are requested to provide an update on their positions in respect of the rights sought by the Applicant over land plot numbers 3-205, 3-206, 3-207, 3-229 and 3-230 with regards to consent under section 135 of the Planning Act 2008. If agreement has not been reached, provide the reasons why, and when agreement is expected to be reached.

DEADLINE FOR RESPONSE

25. The deadline for responses is **23:59 on 20 September 2026**.
26. Responses should be submitted by email only to:
keadbynextgeneration@planninginspectorate.gov.uk
27. Responses will be published on the Keadby Next Generation Power Station Project page of the National Infrastructure Planning website as soon as possible after the 20 September 2026:

<https://national-infrastructure-consenting.planninginspectorate.gov.uk/projects/EN0110001>
28. This letter is without prejudice to the Secretary of State's consideration of whether to grant or withhold development consent for the Proposed Development or any part of the project. Nothing in this letter is to be taken to imply what the eventual decision might be or what final conclusions the Secretary of State may reach on any particular issue which is relevant to the determination of the application.

Yours faithfully,



John Wheadon

Head of Energy Infrastructure Planning Delivery & Innovation

Department for Energy Security and Net Zero