

# **The Keadby Next Generation Power Station Project**

**Planning Inspectorate Ref: EN0110001**

**The Keadby Next Generation Power Station Development Consent Order [year]**

**Land at, and in the vicinity of, the existing Keadby Power Station (Trentside, Keadby, Scunthorpe DN17 3EF)**

## **Technical Note Regarding Keadby CCS Power Station Time Extension**

**The Planning Act 2008**

**Applicant: Keadby Next Generation Limited**

**Date: September 2026**

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# 1. Executive Summary

Article 40(5) of the draft Keadby Next Generation Power Station (KNGPS) DCO proposes to amend Requirement 2 (commencement of the authorised development) of the Keadby Carbon Capture and Storage (Keadby CCS) Power Station DCO to bring the period for commencement into alignment with the period for commencement of the KNGPS DCO. This would have the effect of extending the deadline for the commencement of construction of Keadby CCS from 29th December 2029 to seven years after the KNGPS DCO comes into force (expected to be in November 2026, subject to the SoS decision, and therefore the latest assumed construction commencement date would be a date in November 2033, i.e. around four years later than the Keadby CCS DCO currently allows). Corresponding amendments are proposed to extend the time limits for the exercise of compulsory acquisition powers in Article 20 of the Keadby CCS DCO.

This technical note considers how this DCO amendment could affect the conclusions of the certified Keadby CCS Environmental Statement (ES).

Following a review of changes to baseline conditions (with reference to baseline data collected to inform the KNGPS Environmental Impact Assessment (EIA)) and an updated review of other developments with potential to have cumulative effects (also undertaken for the KNGPS EIA), this technical note concludes that there would be no materially new or different environmental effects to those reported in the certified Keadby CCS ES.

# 1. Introduction

## 1.1. Overview

- 1.1.1. This note has been prepared by Arup and AECOM on behalf of Keadby Next Generation Limited ('the Applicant') which is a subsidiary of SSE plc. A Development Consent Order (DCO) Application ('the Application') was submitted to the Secretary of State (the 'SoS') for Energy Security and Net Zero under Section 37 of 'The Planning Act 2008' ('the 2008 Act') in August 2025 for the Keadby Next Generation Power Station (KNGPS) project. The DCO examination concluded on 19 June 2026.
- 1.1.2. The Applicant is seeking development consent for the construction, operation and maintenance of a new combined cycle gas turbine ('CCGT') electricity generating station on land at, and in the vicinity of, the existing Keadby Power Station, Trentside, Keadby, Scunthorpe DN17 3EF ('the Site').
- 1.1.3. KNGPS is a new CCGT electricity generating station with a capacity of up to 910MW electrical output. The CCGT electricity generating station will be designed to run on 100% hydrogen and able to run on 100% natural gas or a blend of natural gas and hydrogen and will be located on land to the west of Keadby 1 and Keadby 2 Power Stations. KNGPS includes connections for cooling water, electricity, hydrogen and natural gas, and construction laydown areas and other associated development. It is described in full in **Environmental Statement (ES) Volume I Chapter 4: The Proposed Development (Application Document Ref. 6.2.4)**.
- 1.1.4. At Deadline 5 of the examination for KNGPS DCO, Article 40 of the draft KNGPS DCO was amended to extend the commencement date for the Keadby Carbon Capture Power Station (Keadby CCS) DCO, and the exercise of compulsory acquisition powers under that DCO, to match those of the draft KNGPS DCO. The consented Keadby CCS development is located on substantially the same site as that proposed for KNGPS, and the two projects are alternatives, so this amendment would allow the Applicant a reasonable time period after the KNGPS DCO is granted in which to make a decision on which project to bring forward.
- 1.1.5. The Keadby CCS DCO was granted on 29 December 2022 and includes the construction, operation, maintenance and eventual decommissioning of a low carbon CCGT generating station with a capacity of up to 910MW electrical output together with equipment required for the capture and compression of

carbon dioxide emissions from the generating station. In summary the development includes:

- a carbon capture equipped electricity generating station including a CCGT plant, cooling infrastructure, a carbon dioxide capture plant (CCP) including one or two absorption unit(s) and stack(s), conditioning and compression equipment, natural gas receiving facility and supporting activities;
- natural gas pipeline to supply the power station including infrastructure to connect to National Grid Gas's apparatus;
- electrical power export lines and electrical power import lines;
- Water Connection Corridors to provide cooling and make-up water;
- works to and use of an existing outfall and associated pipework for the discharge of return cooling water and treated wastewater to the River Trent;
- towns water connection pipeline;
- above ground carbon dioxide compression and export infrastructure to connect to National Grid Carbon's apparatus;
- new permanent access from A18, including the replacement of Mabey Bridge, installation of a layby and gatehouse and an emergency vehicle and pedestrian access road;
- temporary construction and laydown areas;
- temporary use and restoration of an existing Additional Abnormal Indivisible Load Haulage Route and temporary use and placement of mobile crane(s) at the existing Railway Wharf jetty for a Waterborne Transport Offloading Area;
- landscaping and biodiversity enhancement measures and security fencing and boundary treatments.

- 1.1.6. In order to provide the Secretary of State assurance that the provision can be included, and on a precautionary basis, this technical note considers whether the findings of the EIA for Keadby CCS would be affected by article 40(5) of the draft DCO.

## 2. Article 40(5) of the draft DCO

- 2.1.1. Article 40(5) of the draft KNGPS DCO proposes to amend Requirement 2 (commencement of the authorised development) of the Keadby CCS DCO to bring the period for commencement into alignment with the period for commencement of the KNGPS DCO. This would have the effect of extending the deadline for the commencement of construction of Keadby CCS from 29th December 2029 to seven years after the KNGPS DCO comes into force (expected to be in November 2026, subject to the SoS decision, and therefore the latest assumed construction commencement date would be a date in November 2033, i.e. around four years later than the Keadby CCS DCO currently allows). Corresponding amendments are proposed to extend the time limits for the exercise of compulsory acquisition powers in Article 20 of the Keadby CCS DCO.
- 2.1.2. Each environmental topic within the Keadby CCS certified ES (and the waste technical note provided in response to Section 51 advice) assessed a reasonable worst case. The earliest construction start date (year) was identified to be 2022 and the latest was identified to be 2029. The Air Quality and Traffic and Transport assessments (ES Chapters 8 and 10 respectively) considered the latest construction start date of 2029 (the latest anticipated start date at that time) to be the worst case as these assessment topics relate to baseline traffic flows which are projected to increase year on year. For all other topics the worst case construction start date was not specified within the assessment as the specific start date does not materially influence the assessment.
- 2.1.3. The duration of the operational lifetime of Keadby CCS (up to approximately 25 years from start of operation) is not anticipated to change and remains as assessed within the certified Keadby CCS ES.
- 2.1.4. At the national level, the Keadby CCS DCO accords with the Energy National Policy Statements (NPS) that had effect at that time, namely:
- Overarching NPS for Energy 2011 ('EN-1 2011') (DESNZ, 2011a);
  - NPS for Fossil Fuel Electricity Generating Infrastructure 2011 ('EN-2 2011') (DESNZ, 2011b);
  - NPS for Gas Supply Infrastructure and Gas and Oil Pipelines 2011 ('EN-4 2011') (DESNZ, 2011c); and
  - NPS for Electricity Networks Infrastructure 2011 ('EN-5 2011') (DESNZ, 2011d).
- 2.1.5. The 2024 Energy NPSs relevant to the draft KNGPS DCO are:
- Overarching NPS for Energy ('EN-1 2024') (DESNZ, 2024a);

- NPS for Natural Gas Electricity Generating Infrastructure ('EN-2 2024') (DESNZ, 2024b);
- NPS for natural gas supply infrastructure and gas and oil pipelines ('EN-4 2024') (DESNZ, 2024c); and
- NPS for Electricity Networks Infrastructure ('EN-5 2024') (DESNZ, 2024d).

- 2.1.6. The policy in the 2024 Energy NPSs has not experienced substantial change. EN-1 2024 (DESNZ, 2024a) sets out several types of infrastructure which are now considered to be a 'critical national priority' (CNP). This includes natural gas fired generation which is carbon capture ready. EN-1 2024 considers CNP infrastructure to be urgently needed for both energy security and achieving Net Zero. At local policy level, there have been no relevant policy updates.
- 2.1.7. Taking account of the relevant 2024 Energy NPSs, the Applicant notes that the relevant national and local policy has not substantially changed compared to that taken into account by the SoS in deciding to grant the Keadby CCS Order. Therefore, both the Keadby CCS DCO and the draft KNGPS DCO are considered to accord with the relevant national and local policy. Several UK Government energy and climate change policy documents have been released since the Keadby CCS DCO was made and these serve to further underline the urgent need for low carbon power generation which the Keadby CCS DCO is aligned with.

## 3. Appraisal Methodology

### 3.1. Scope of the Keadby CCS Environmental Assessments

3.1.1. As part of the DCO application process for Keadby CCS an EIA Scoping Report was produced and an EIA Scoping Opinion issued by the Planning Inspectorate in June 2020 to agree the required topic assessments. As a result of the scoping process, the certified ES included the following topics:

- Air quality;
- Noise and vibration;
- Traffic and transport;
- Biodiversity and nature conservation;
- Water environment and flood risk;
- Geology, hydrogeology and land contamination;
- Landscape and visual amenity;
- Cultural heritage;
- Socio-economics;
- Climate change and sustainability;
- Major accidents and disasters; and
- Cumulative and combined effects.

3.1.2. A human health ES chapter was not included in the Keadby CCS ES and the assessment of human health effects was instead included within Appendix 16A: Population and Health Signposting.

3.1.3. A waste ES chapter was not included in the Keadby CCS ES but an assessment of waste was provided in a waste technical note published in July 2021 in response to Section 51 advice from the Planning Inspectorate.

### 3.2. Baseline Information

3.2.1. The environmental assessments included within the certified ES for Keadby CCS were finalised in May 2021 and were therefore informed by desktop and survey baseline data collected before this date. The waste technical note was prepared in July 2021.

3.2.2. Due to the time elapsed since the certified ES and waste technical note were completed in 2021 and the present day there is the potential for the baseline

information for the Keadby CCS development site and its surrounding area to have changed.

- 3.2.3. The proposed KNGPS development is located on substantially the same site as the Keadby CCS development and therefore baseline data collected for the KNGPS EIA has been used to review changes to the baseline data for the site since the Keadby CCS ES and waste technical note were produced. The environmental assessments included within the KNGPS application were published in August 2025. Given the availability of this updated data additional surveys have not been undertaken to inform this technical note.

### **3.3. Approach to Appraisal**

- 3.3.1. The authorised Keadby CCS development remains unchanged in terms of its proposed location, design, scale, construction activities and operational characteristics. The proposed change would affect only the timing of implementation, with construction anticipated to commence as late as 2033 rather than 2029.
- 3.3.2. A qualitative approach has been used to assess any materially new or different likely significant effects as a result of the proposed change to those identified within the certified Keadby CCS ES and waste technical note. No additional quantitative assessment to that included within the certified ES and waste technical note is deemed to be required due to the nature of the changes being proposed.
- 3.3.3. In the absence of any changes that would reasonably be expected to give rise to materially new or different likely significant effects, additional quantitative assessment or updated modelling is not considered necessary or proportionate, and a qualitative review is considered sufficient to confirm that the conclusions of the certified ES and waste technical note remain valid.

### **3.4. Flood Mitigation**

- 3.4.1. Between the publication of the Keadby CCS DCO and the draft KNGPS DCO, the Environment Agency published a new Tidal Trent model (in 2023) with higher flood levels in the River Trent and required consideration of a longer development timeframe (with increased climate change allowances). The hydraulic model used to inform the Flood Risk Assessment (FRA) was therefore updated as part of the KNGPS DCO Application to take account of this updated information and resulted in a higher development platform level of 3.0m AOD being required to ensure critical operational infrastructure remained secure in the event of the modelled flood scenarios (i.e. a breach of the flood defences along the River Trent in the vicinity of the site during a 0.5% Annual Exceedance Probability (AEP) tidal event, assuming no defence improvements

are made). This development platform level was subsequently agreed with the Environment Agency.

- 3.4.2. The minimum platform level secured in the Keadby CCS DCO was 2.8m AOD which was reflective of the data and information available when the DCO was made but based on the present available information, it is considered likely that the platform level would now be required to meet the equivalent level as presented in the KNGPS DCO i.e. 3.0m AOD. On this basis and given that the updated flood modelling has recently been completed for the KNGPS DCO Application, the increase in platform level and updated modelling results have therefore been considered and factored into the findings presented within this environmental appraisal to ensure the findings remain robust and reflective of the latest available information.
- 3.4.3. This is consistent with Requirement 14 of the Keadby CCS DCO which requires that *“No part of the authorised development may commence, save for the permitted preliminary works, until a scheme for the mitigation of flood risk during construction and the creation of a suitable development platform for the generating station, has been submitted to, and after consultation with the lead local flood authority and approved by the relevant planning authority.”* This Requirement provides an appropriate control for ensuring that if the Keadby CCS development is taken forward, appropriate flood risk mitigation will be in place including a suitable development platform height, which is now agreed to be 3.0m AOD (i.e. 20cm above the minimum required elevation of 2.8m AOD). For completeness, this Requirement ensures minimum levels for the relevant construction works (in subparagraph (2)) and operational assessments (in subparagraph (5)).
- 3.4.4. The design parameters for buildings and structures are set out in Schedule 11 of the Keadby CCS DCO. These set maximum heights of buildings and structures above ordnance datum. Although the 20cm increase in the development platform height would not increase the maximum height of the stacks, it would reduce their maximum height relative to the ground level at the base by 20cm. This would have no impact on the performance of the stack and there is no requirement to increase the height of the stack as a result.
- 3.4.5. Similarly, the maximum height of buildings and structures is set by Schedule 11 of the Keadby CCS DCO. The 20cm increase in development platform height would effectively reduce the maximum height of these buildings and structures

relative to ground level at their base by 20cm. This would not restrict the ability of these buildings and structures to accommodate the plant and equipment.

- 3.4.6. The change in development platform height from 2.8m AOD to 3.0m AOD potentially influences the following assessment topics (discussed in Section 4 of this technical note):
- Water Environment and Flood Risk;
  - Traffic and Transport (and associated assessments of Air Quality and Noise and Vibration traffic impacts); and
  - Landscape and Visual Amenity.

### 3.5. Review of Other Committed Developments

- 3.5.1. The certified Keadby CCS ES included a review of committed developments within the Zone of Influence in Chapter 19: Cumulative and Combined Effects. Chapter 21: Cumulative and Combined Effects of the KNGPS ES also included a review of committed developments within a very similar Zone of Influence.
- 3.5.2. The change in potential construction start date for Keadby CCS will not lead to any changes to the construction, operational and decommissioning activities of the authorised development.
- 3.5.3. Any major developments within the Zone of Influence that have submitted a planning application since the certified ES was submitted would have been required to consider cumulative construction and operational effects with the authorised development. No further assessment of cumulative operational effects is considered to be required, but a review of cumulative construction effects has been undertaken where relevant (i.e. where the construction phase for Keadby CCS could now, as a result of article 40(5), overlap with another development's construction phase where that would not previously have been anticipated).
- 3.5.4. As KNGPS is situated on the same site as Keadby CCS the long list of developments included within the cumulative impact assessment for KNGPS has been used to determine relevant committed developments. The list of committed developments outlined below in Table 1 is therefore the same as those assessed within the KNGPS cumulative effects assessment. ID 2: North Lincolnshire Green Energy Park DCO EN010116 was the only development in Table 1 that was previously considered within the Keadby CCS cumulative impact assessment.
- 3.5.5. The following developments have been identified for consideration of cumulative construction impacts within Section 4 below:

**Table 1: Committed Developments**

| ID | Name/reference                                       | Overlap in temporal scope | Scale and nature of development likely to have a significant effect                | Progress to appraisal |
|----|------------------------------------------------------|---------------------------|------------------------------------------------------------------------------------|-----------------------|
| 1  | Humber Carbon Capture Pipeline<br>DCO EN0710003      | Yes                       | Yes – the potential for significant environmental effects that merit consideration | Yes                   |
| 2  | North Lincolnshire Green Energy Park DCO<br>EN010116 | Yes                       | Yes – the potential for significant environmental effects that merit consideration | Yes                   |
| 3  | Tween Bridge Solar Farm DCO<br>EN010148              | Yes                       | Yes – the potential for significant environmental effects that merit consideration | Yes                   |
| 4  | North Humber to High Marnham DCO<br>EN020034         | Yes                       | Yes – the potential for significant environmental effects that merit consideration | Yes                   |
| 5  | Moors Solar Farm<br>PA/SCR/2021/8                    | Yes                       | Yes – the potential for significant environmental effects that merit consideration | Yes                   |
| 6  | Pilfrey Solar Farm<br>PA/SCR/2021/7                  | Yes                       | Yes – the potential for significant environmental effects that merit consideration | Yes                   |
| 7  | Scunthorpe Electric Arc Furnace<br>PA/2024/123       | Yes                       | Yes – the potential for significant environmental effects that merit consideration | Yes                   |

| ID | Name/reference               | Overlap in temporal scope | Scale and nature of development likely to have a significant effect                | Progress to appraisal |
|----|------------------------------|---------------------------|------------------------------------------------------------------------------------|-----------------------|
| 8  | North Humber to High Marnham | Yes                       | Yes – the potential for significant environmental effects that merit consideration | Yes                   |
| 9  | Tween Bridge Solar Farm      | Yes                       | Yes – the potential for significant environmental effects that merit consideration | Yes                   |

### 3.6. Greenhouse Gas Emissions

- 3.6.1. In June 2024, the UK Supreme Court issued a majority ruling in favour of the appellant in the case of R (Finch) v Surrey County Council ('the Finch case') (The Supreme Court, 2024). This determined that a greenhouse gas (GHG) assessment carried out as part of an EIA must consider not only the direct effects of a proposed development but also any indirect effects (whether upstream or downstream of the proposed development) where these effects are an inevitable consequence of the development itself.
- 3.6.2. The ruling in the Finch case is considered to be potentially relevant predominantly to the scope of the Climate Change and Sustainability assessment. The calculations of GHG emissions that were presented as part of the Keadby CCS DCO have therefore been updated as part of this technical note (see Section 4.2), in light of the outcomes of the Finch case. Although it is not considered to have altered the scope of the wider topics it has nonetheless still been considered and applied on a precautionary basis to the review of each assessment topic in this technical note.

## 4. Environmental Appraisal

### 4.1. Review of Keadby CCS ES Conclusions in Relation to draft KNGPS DCO Article 40(5)

- 4.1.1. This section provides a review of whether article 40(5) has the potential to lead to any materially new or different likely significant effects to those outlined within the certified Keadby CCS ES and waste technical note, taking into account any notable changes to baseline conditions, and additional cumulative effects with other committed developments.

**Table 2: Environmental Appraisal**

| Topic       | Materially new or different likely significant effect? | Environmental appraisal                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
|-------------|--------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Air quality | No                                                     | <p><u>Baseline</u></p> <p>The baseline concentrations of oxides of nitrogen (NO<sub>x</sub>), nitrogen dioxide (NO<sub>2</sub>) and nitrogen deposition have reduced between the assessments carried out for the certified Keadby CCS ES and the KNGPS ES. This trend is expected to continue over time, due to more modern and electric road vehicles entering the national vehicle fleet. Concentrations of particulate matter (PM) in terms of PM<sub>10</sub> and PM<sub>2.5</sub> have also reduced, although to a lesser extent.</p> <p>The future baseline conditions are not predicted to be materially different and in fact are likely to be lower than previously assessed due to the trend for improving air quality.</p> <p><u>Construction (and Decommissioning) Effects</u></p> <p>Chapter 8 (Air Quality) of the certified Keadby CCS ES considered the likely significant effects arising from construction of the authorised development.</p> <p>With the appropriate mitigation in place, based on the sensitivity of the identified receptors and the determined level of risk, and enforced through the Construction Environmental Management Plan (CEMP), the impacts of construction dust were determined to be not significant. The requirement to implement the CEMP (secured by Requirement 17 of the DCO) would continue to apply and extending</p> |

| Topic | Materially new or different likely significant effect? | Environmental appraisal                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|-------|--------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|       |                                                        | <p>the construction start date to 2033 would therefore not change the assessment conclusion.</p> <p>Impacts associated with construction traffic were assessed for the peak construction year of 2029 and were found to be negligible and therefore not significant, with increases in the 'do minimum' and 'do something' scenarios all being less than 1% of the relevant Air Quality Assessment Levels (AQAL) at all receptors. Delaying the start date of construction to 2033 may result in baseline traffic numbers increasing, however due to the fact that baseline pollutant concentrations are decreasing overtime, the negligible impacts predicted would not change.</p> <p>The construction traffic impacts were based on construction traffic during the peak construction period. Due to the timing of the works to increase the development platform level for flood mitigation (i.e. assumed to be over the first 12 months of the construction programme), the additional construction traffic associated with these works does not coincide with the peak months for traffic movements (predicted to occur in months 26 and 27) on which the assessment was based. As such, the increase in traffic numbers (HDV and LDV) predicted in relation to the increase in platform level remains below the peak construction numbers used in the assessment.</p> |

| Topic | Materially new or different likely significant effect? | Environmental appraisal                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
|-------|--------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|       |                                                        | <p>Therefore, the additional traffic associated with the increase the platform level would not change the results of the assessment carried out. It is therefore considered that the negligible air quality impacts associated with the certified Keadby CCS ES would remain <b>not significant</b>.<u>Operation Effects</u></p> <p>Operational traffic emissions were screened from requiring assessment for the certified Keadby CCS ES, with traffic numbers being below those predicted for the construction phase. The delay in the start of construction would not impact the assessment of operational traffic.</p> <p>In terms of the air quality emissions from the operational power station, the effects were considered to be not significant. For human health receptors, this was based on the location of the maximum impact, rather than at individual receptor locations, so the results would not be affected if new receptors were developed (e.g. new residential development). There will be no change to the position of the stack emission height in mAOD due to the additional 20cm height on the development platform for flood mitigation as the height is secured by Schedule 11 of the Keadby CCS DCO, and therefore there are no changes to the modelled dispersion.</p> |

| Topic               | Materially new or different likely significant effect? | Environmental appraisal                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
|---------------------|--------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                     |                                                        | <p>The operational Keadby CCS would remain subject to the same operational emission limits as set out within the certified ES and the Environmental Permit (granted in 2024).</p> <p>Therefore, the impacts associated with the operational authorised development would remain <b>not significant</b>.</p> <p><u>Cumulative Effects</u></p> <p>A review of additional committed development identified for the KNGPS EIA (see Table 1) has not identified any changes which would give rise to new or different likely significant effects that would not have ordinarily been addressed through the granting of planning applications subsequent to the Keadby CCS DCO. Cumulative air quality effects are therefore anticipated to remain <b>not significant</b>.</p> <p><u>Conclusion</u></p> <p>There would be <b>no materially new or different likely significant effects</b> in relation to air quality compared to the original certified ES conclusions if the deadline for commencement of the authorised Keadby CCS development is extended by approximately four years.</p> |
| Noise and vibration | No                                                     | <u>Baseline</u>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |

| Topic | Materially new or different likely significant effect? | Environmental appraisal                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
|-------|--------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|       |                                                        | <p>Noise impact assessments are based on the baseline environmental sound level. No changes to the baseline are expected that would lead to a materially different assessment of significant effects. No change is anticipated in number and location of noise sensitive receptors within the study area.</p> <p><u>Construction (and Decommissioning) Effects</u></p> <p>The locations of the works and the construction plant and processes to be used are not expected to change therefore the noise and vibration assessment would be not materially different.</p> <p>As noted in the traffic and transport section below, traffic baseline and construction traffic parameters that define the construction traffic noise level would be not materially different and impacts remain very low.</p> <p>The conclusion therefore remains that construction and decommissioning noise and vibration effects, including from additional traffic, would be <b>not significant</b>.</p> <p><u>Operation Effects</u></p> <p>As there would be no change to the design or location of the proposed Keadby CCS development, no material changes to noise or vibration impacts would occur. The conclusion therefore remains that operational noise and vibration effects would be <b>not significant</b>.</p> |

| Topic                 | Materially new or different likely significant effect? | Environmental appraisal                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
|-----------------------|--------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                       |                                                        | <p><u>Cumulative Effects</u></p> <p>A review of additional committed development identified for the KNGPS EIA (see Table 1) did not identify any changes which would cause any materially new or different likely significant effects. The conclusion therefore remains that cumulative noise and vibration effects would be <b>not significant</b>.</p> <p><u>Conclusion</u></p> <p>There would be <b>no materially new or different likely significant effects</b> in relation to noise and vibration compared to the original certified ES conclusions if the deadline for commencement of the authorised Keadby CCS development is extended by approximately four years.</p> |
| Traffic and transport | No                                                     | <p><u>Baseline</u></p> <p>The transport baseline has been reviewed using information collected to inform the KNGPS ES. The principal highway network serving the site is not materially different. The A18, A161 and M180 corridor continue to provide the primary routes for Keadby CCS development traffic, and no material changes to the highway network have been identified. In addition, no new sensitive traffic and</p>                                                                                                                                                                                                                                                 |

| Topic | Materially new or different likely significant effect? | Environmental appraisal                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
|-------|--------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|       |                                                        | <p>transport receptors have been identified that would materially increase the sensitivity of receptors previously assessed.</p> <p><u>Construction Effects</u></p> <p>The Keadby CCS ES considered the likely significant effects arising from construction of the development. The assessment was undertaken using a worst-case construction commencement year of 2029 and concluded that effects relating to severance, driver delay, pedestrian delay, non-motorised user amenity, fear and intimidation, and road safety would be negligible and therefore not significant.</p> <p>The proposed extension to the commencement period would not alter the construction activities, traffic routing strategy, construction workforce, HGV movements or mitigation measures associated with the development. Construction traffic would continue to be managed through a Construction Traffic Management Plan secured through the DCO. Although background traffic volumes may increase between 2029 and 2033, the increases associated with construction traffic would remain small relative to existing and future baseline traffic flows and would not be expected to materially alter the conclusions of the certified ES. Accordingly, no materially new or different likely significant</p> |

| Topic | Materially new or different likely significant effect? | Environmental appraisal                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
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|       |                                                        | <p>construction traffic and transport effects have been identified, and the conclusion remains that there would be <b>no significant</b> effects.</p> <p>A 20 cm increase in height to the Keadby CCS development platform would increase the volume of earthworks required by approximately 40,000m<sup>3</sup> from approximately 180,000m<sup>3</sup> to 220,000m<sup>3</sup>. Over a 12-month earthworks period, there would be an increase in vehicle movements from 59 HGVs per direction per day to 72 HGVs per direction per day.</p> <p>As the earthworks would still take place over the first 12 months of the programme, the peak daily vehicle movements including construction workers (which is 210 vehicles in each direction per day in Month 12) would be 272 vehicles in each direction per day so a total of 544 two-way movements per day – which would increase from 518 vehicles per day with the additional earthworks required.</p> <p>This would still be significantly lower than the overall peak reported in the Keadby CCS ES and Transport Assessment which was 1,236 vehicles per day (in Months 26 and 27). This comprised 1,116 vehicles per day for construction workers (558 in and 558 out) and 120 HGVs per day (60 in and 60 out) construction worker vehicles. Given the increase in vehicles does not change the peak months for traffic movements, the conclusion remains <b>not significant</b>.</p> |

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### Operation Effects

The operational characteristics of the authorised development remain unchanged from those assessed within the certified Keadby CCS ES. Operational traffic generation would continue to be low compared with construction traffic and the certified ES concluded that operational traffic effects would be negligible and not significant.

The proposed extension to the commencement period would not alter the operational traffic generation, access arrangements or operational highway impacts of the authorised development. Furthermore, no changes to the highway network or the location of sensitive receptors have been identified which would materially affect the conclusions of the certified ES. Accordingly, the operational traffic and transport effects associated with the authorised development would remain **not significant**.

### Decommissioning Effects

The certified Keadby CCS ES concluded that decommissioning traffic effects would be no greater than those associated with the construction phase and would therefore be negligible and not significant. The proposed extension to the commencement period would not alter the anticipated nature or scale of decommissioning activities, nor would it affect the requirement for a Decommissioning Traffic Management Plan. Therefore, no new or different likely significant decommissioning traffic and transport effects have been identified and the conclusion remains that effects would be **not significant**.

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### Cumulative Effects

A review of additional committed development identified for the KNGPS EIA (see Table 1) has been undertaken. All of the committed developments outlined in Table 1 were assessed within the KNGPS ES and only two were identified as having the potential for cumulative traffic and transport interaction with the Keadby CCS development; however, both were predicted to result in no residual cumulative effects. Assuming there has been no material changes to the nature, scale, programme or traffic characteristics of these committed developments since the KNGPS assessment was undertaken, those conclusions are considered to remain applicable. It is therefore concluded that there would be no residual cumulative traffic and transport effects associated with any of the committed developments.

On this basis, the conclusions of the Keadby CCS cumulative assessment are considered to remain applicable and no residual cumulative traffic and transport effects would be expected should construction of the authorised development commence in 2033. Therefore, no new or different likely significant cumulative traffic and transport effects have been identified and the conclusion remains that effects would be **not significant**.

### Conclusion

There would be **no materially new or different likely significant effects** in relation to traffic and transport compared to the original certified ES conclusions if

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| Topic                                | Materially new or different likely significant effect? | Environmental appraisal                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
|--------------------------------------|--------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                      |                                                        | the deadline for commencement of the authorised Keadby CCS development is extended by approximately four years.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| Biodiversity and nature conservation | No                                                     | <p><u>Baseline</u></p> <p>The baseline habitats and protected species identified within the ES for the Keadby CCS development align with those identified within the KNGPS ES, confirming that there has been no material change to baseline conditions.</p> <p>The future baseline conditions are also not predicted to be materially different should the Keadby CCS development commence approximately four years later than December 2029. This is because the baseline and future baseline conditions described within the certified ES for Keadby CCS are consistent with those described within the KNGPS ES.</p> <p><u>Construction, Operation and Decommissioning Effects</u></p> <p>No new likely significant effects were identified in relation to the proposed KNGPS development based on the updated baseline data.</p> <p>The pre-commencement Requirement in the Keadby CCS DCO to undertake an appropriate suite of updated protected species surveys remains suitable for the identification of any changes in the baseline status of protected species at the</p> |

| Topic | Materially new or different likely significant effect? | Environmental appraisal                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
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|       |                                                        | <p>time of construction, and the Requirement also specifies the approach for agreement of any additional mitigation needs prior to commencement of construction. This approach aligns with that committed for the proposed KNGPS development.</p> <p>No likely additional impacts and effects have been identified if the deadline for commencement of Keadby CCS is extended by approximately four years. The conclusion of the original ES (<b>no significant effects</b>) remains valid.</p> <p><u>Cumulative Effects</u></p> <p>Given the direct impacts of Keadby CCS on biodiversity and nature conservation have been fully mitigated there is only potential for indirect cumulative effects through pathways relating to indirect effects on the environment.</p> <p>A review of additional committed development identified for the KNGPS EIA (see Table 1) has been undertaken by specialists in noise, air quality, traffic and water environment and this did not identify any changes which would cause any materially new or different likely significant environmental effects. All of the committed developments outlined in Table 1 were assessed within the KNGPS ES and only two were assessed as having the potential for cumulative traffic and transport interaction with the Keadby CCS development. However, it is concluded that there would be no residual cumulative traffic and transport effects associated</p> |

| Topic                            | Materially new or different likely significant effect? | Environmental appraisal                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
|----------------------------------|--------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                  |                                                        | <p>with any of the committed developments. Given the above, <b>no likely significant</b> additional cumulative impacts and effects are anticipated if the deadline for commencement of Keadby CCS is extended by approximately four years.</p> <p><u>Conclusion</u></p> <p>There would be <b>no materially new or different likely significant effects</b> in relation to biodiversity and nature conservation compared to the original certified ES conclusions if the deadline for commencement of the authorised Keadby CCS development is extended by approximately four years.</p> |
| Water environment and flood risk | No                                                     | <p><u>Baseline</u></p> <p>The baseline conditions described within the certified ES for Keadby CCS are consistent with those described within the KNGPS ES.</p> <p>As noted at paragraph 3.4.1 of this technical note, there would be a slight difference in flood risk as climate change increases further into the future and the Environment Agency's 2023 Tidal Trent flood model predicts higher flood levels in the River Trent than modelled at the time of the Keadby CCS ES and FRA, but the future baseline conditions for the water environment and flood risk are not</p>   |

| Topic | Materially new or different likely significant effect? | Environmental appraisal                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
|-------|--------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|       |                                                        | <p>predicted to be materially different should Keadby CCS commence around four years later than December 2029.</p> <p><u>Construction, Operation and Decommissioning Effects</u></p> <p>All potential effects were identified within the Keadby CCS ES and FRA as not significant.</p> <p>Keadby CCS has a pre-commencement Requirement securing the preparation and implementation of a CEMP, including consultation with Natural England and the Environment Agency. This together with abstractions and discharges being regulated activities through the Environment Agency would ensure that no likely additional impacts and significant effects would occur if the deadline for commencement is extended.</p> <p>It is assumed as set out in paragraph 3.4.2 that the development platform for Keadby CCS development would need to be raised to 3.0m AOD (the required level identified by the more recent hydraulic modelling undertaken for KNGPS DCO) rather than 2.8m AOD (the minimum platform level stated in Requirement 14 of the Keadby CCS DCO).</p> <p>As the change in commencement date is relatively minor, and the off-site impacts of a greater area of land raising to 3.0m AOD have been assessed for KNGPS</p> |

| Topic | Materially new or different likely significant effect? | Environmental appraisal                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
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|       |                                                        | <p>ES and found to have no significant effects, no material changes are expected due to the increasing effects of climate change on flood risk, and the outcome of the assessments presented in the Keadby CCS ES and FRA would remain the same (<b>no significant</b> effects).</p> <p><u>Cumulative Effects</u></p> <p>The review of committed development and receptors did not identify any changes which would give rise to new or different likely significant cumulative effects that would not have ordinarily been addressed through the granting of planning applications subsequent to the DCO. <b>No significant</b> cumulative effects have been identified.</p> <p><u>Conclusion</u></p> <p>There would be <b>no materially new or different likely significant effects</b> in relation to the water environment and flood risk compared to the original certified ES conclusions if the deadline for commencement of the authorised Keadby CCS development is extended by approximately four years.</p> |

| Topic                                        | Materially new or different likely significant effect? | Environmental appraisal                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
|----------------------------------------------|--------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Geology, hydrogeology and land contamination | No                                                     | <p><u>Baseline</u></p> <p>The baseline conditions identified in the Keadby CCS ES align with those identified in the KNGPS ES.</p> <p>The future baseline conditions described within the certified ES for Keadby CCS are consistent with those described within the KNGPS ES. The future baseline conditions are not predicted to be materially different should the Keadby CCS development commence later than December 2029.</p> <p><u>Construction, Operation and Decommissioning Effects</u></p> <p>All potential effects in the Keadby CCS ES were identified as not significant.</p> <p>The pre-commencement Requirement in the Keadby CCS DCO to undertake appropriate ground conditions investigations to deal with contaminated land and groundwater is suitable for the identification and management of ground contamination prior to construction and the Requirement also specifies that the approach for any remedial measures needs agreement with the local planning authority. This approach aligns with that committed for the proposed KNGPS development and therefore, there would be no likely additional impacts and effects if the deadline for commencement is extended by around four years. The conclusion of the original ES (<b>no significant</b> effects) remains valid.</p> |

| Topic                        | Materially new or different likely significant effect? | Environmental appraisal                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
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|                              |                                                        | <p><u>Cumulative Effects</u></p> <p>A review of additional committed development identified for the KNGPS EIA (see Table 1) has been completed and did not identify any changes which would give rise to new or different likely significant effects that would not have ordinarily been addressed through the granting of planning applications subsequent to the DCO. The conclusion of the original ES (<b>no significant</b> effects) remains valid.</p> <p><u>Conclusion</u></p> <p>There would be <b>no materially new or different likely significant effects</b> in relation to geology, hydrogeology and land contamination compared to the original certified ES conclusions if the deadline for commencement of the authorised Keadby CCS development is extended by approximately four years.</p> |
| Landscape and visual amenity | No                                                     | <p><u>Baseline</u></p> <p>The landscape and visual amenity impact assessment is based on baseline landscape character information including published documents and the views from identified representative viewpoints. There are likely to be a low level of change to views as a result of vegetation growth and small scale development, although these are not likely to be material such that they would change the characteristics or value of the view. No changes to the baseline are therefore</p>                                                                                                                                                                                                                                                                                                  |

| Topic | Materially new or different likely significant effect? | Environmental appraisal                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
|-------|--------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|       |                                                        | <p>expected that would lead to a materially different assessment of significant effects.</p> <p><u>Construction (and Decommissioning) Effects</u></p> <p>The certified Keadby CCS ES identified no significant effects on landscape but did identify significant adverse effects on residential receptors on Chapel Lane West, Keadby (Viewpoint 1) and at Gate Keepers Residence, Vazon Bridge (Viewpoint 2) and significant effects on users of the Stainforth and Keadby Canal and towpath (Viewpoint 2) and a public right of way to the north of Keadby (Viewpoint 4) during construction and decommissioning.</p> <p>The locations of the works and the construction plant and processes to be used are expected not to change so there would be no significant changes to the landscape and visual amenity impacts. The <b>significant adverse</b> visual effects on Viewpoints 1, 2 and 4 described above would remain as per the certified ES, and all other landscape and visual effects would remain <b>not significant</b>.</p> <p><u>Operation Effects</u></p> <p>A 20 cm increase in height to the proposed Keadby CCS development platform would not increase the maximum height of structures because Schedule 11 of the Keadby CCS DCO sets maximum heights in mAOD. There would therefore be</p> |

| Topic | Materially new or different likely significant effect? | Environmental appraisal                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
|-------|--------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|       |                                                        | <p>no changes to landscape and visual amenity impacts. The conclusions of the operational landscape and visual amenity assessment remain as per the certified ES – <b>significant adverse</b> visual effects for Viewpoints 1, 2 and 4 (and also residents at Truck Road, Keadby (Viewpoint 6) if Keadby 1 Power Station was to be demolished in future) and <b>no significant</b> effects on all other landscape and visual receptors.</p> <p><u>Cumulative</u></p> <p>The review of committed developments did not identify any changes which would give rise to materially new or different likely significant effects. The cumulative developments are of a low height and nature such that the introduction of the Keadby CCS development to landscape character areas and views would not give rise to a cumulative effect that is greater than that assessed for the Keadby CCS in isolation. The conclusion of the original ES (<b>no significant</b> effects) remains valid.</p> <p><u>Conclusion</u></p> <p>There would be <b>no materially new or different likely significant effects</b> in relation to landscape and visual amenity compared to the original certified ES</p> |

| Topic             | Materially new or different likely significant effect? | Environmental appraisal                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
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|                   |                                                        | conclusions if the deadline for commencement of the authorised Keadby CCS development is extended by approximately four years.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| Cultural heritage | No                                                     | <p><u>Baseline</u></p> <p>The cultural heritage baseline conditions identified in the ES for Keadby CCS were updated following the completion of archaeological surveys within the site and the results of these surveys were set out within the KNGPS ES.</p> <p>No changes to the future baseline are expected that would lead to a materially different assessment of significant effects.</p> <p><u>Construction (and Decommissioning) Effects</u></p> <p>All potential effects were identified as not significant within the Keadby CCS ES, except for construction effects on below ground archaeological remains pertaining to peat deposits and palaeoenvironmental remains where potential for a significant effect was identified, resulting in the identification of mitigation requirements for these archaeological remains. The pre-commencement Requirement for both Keadby CCS and KNGPS comprises geoarchaeological analysis and reporting, and archaeological monitoring during groundworks within specified areas of the site during construction, as set out within the KNGPS Outline Written Scheme of Investigation (OWSI). The residual effect was</p> |

| Topic | Materially new or different likely significant effect? | Environmental appraisal                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
|-------|--------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|       |                                                        | <p>assessed to be not significant. The commitments as set out within the OWSI are not affected by the commencement date of construction and as such there would be no likely additional impacts and effects if commencement is later.</p> <p>As there would be no change to the design or location of the Keadby CCS development, no material changes to cultural heritage impacts would occur and the conclusion of the assessment (<b>no significant</b> effects) therefore remains.</p> <p><u>Operation Effects</u></p> <p>As there would be no change to the design or location of the Keadby CCS development, no material changes to cultural heritage impacts would occur and the conclusion remains that there would be <b>no significant</b> effects.</p> <p><u>Cumulative Effects</u></p> <p>A review of additional committed development identified for the KNGPS EIA (see Table 1) did not identify any changes which would give rise to materially new or different likely significant effects. The conclusion of the original ES (<b>no significant</b> effects) remains valid.</p> <p><u>Conclusion</u></p> <p>There would be <b>no materially new or different likely significant effects</b> in relation to cultural heritage compared to the original certified ES conclusions if the</p> |

| Topic           | Materially new or different likely significant effect? | Environmental appraisal                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
|-----------------|--------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                 |                                                        | deadline for commencement of the authorised Keadby CCS development is extended by approximately four years.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| Socio-economics | No                                                     | <p><u>Baseline</u></p> <p>Socio-economic impact assessment for construction, operation and decommissioning is based on a baseline calculated through use of public data sources. No material changes to the baseline are expected that would lead to a materially different assessment of significant effects. The only potential change to baseline would be population growth within the study area, but this is not likely to be material. No material change is anticipated to the number of socio-economic receptors within the study area.</p> <p><u>Construction (and Decommissioning) Effects</u></p> <p>The locations of the works and the construction plant and processes to be used are expected not to change to the extent that there would be significant changes to the socio-economic impacts. The <b>significant beneficial</b> construction effect due to employment creation would remain and decommissioning effects would remain <b>not significant</b>.</p> |

| Topic | Materially new or different likely significant effect? | Environmental appraisal                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
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|       |                                                        | <p><u>Operation Effects</u></p> <p>As there would be no change to the design or location of the Keadby CCS development, no material changes to socio-economic impacts would occur, and the conclusions of the assessment would remain (<b>no significant</b> effects).</p> <p><u>Cumulative Effects</u></p> <p>A review of committed development did not identify any changes which would cause any materially new or different likely significant effects. The cumulative impacts relate to construction workers employed in other major DCOs, which will not materially change during the period 2029 to 2033. The conclusion of the original ES (<b>no significant</b> effects) remains valid.</p> <p><u>Conclusion</u></p> <p>There would be <b>no materially new or different likely significant effects</b> in relation to socio-economics compared to the original certified ES conclusions if the deadline for commencement of the authorised Keadby CCS development is extended by approximately four years.</p> |

| Topic                             | Materially new or different likely significant effect? | Environmental appraisal                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
|-----------------------------------|--------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Climate change and sustainability | No                                                     | <p><u>GHG Emissions Assessment</u></p> <p>The GHG emissions assessment presented in the Keadby CCS ES was undertaken prior to the release of the 2022 update (and subsequent 2026 update) to the Institute of Environmental Management and Assessment (IEMA) (now Institute of Sustainability and Environmental Professionals (ISEP, 2025)) guidance on Assessing GHG Emissions and Evaluating their Significance. The assessment methodologies used for the GHG assessments of the Keadby CCS and the Keadby NGPS therefore differed, but the baseline scenario was consistent for both assessments (i.e. no construction of a power station on site).</p> <p>Please refer to Section 4.2 of this technical note for an updated assessment using the assessment criteria in the latest ISEP guidance and the later potential construction start date of 2033. This determines there is no significant adverse effects when assessed using the same construction period as was assumed for the KNGPS assessment. Any further shifts in the construction period (back to as late as 2033) would not affect the outcome of the assessment. The conclusion of the GHG assessment (<b>no significant</b> effect) therefore remains valid.</p> |

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### Climate Change Resilience and In-Combination Climate Change Impact Assessments

There would be a minor impact on the climate change resilience (CCR) assessment and in-combination climate change impact (ICCI) assessment presented in the Keadby CCS ES as a result of the construction date shifting back to as late as 2033, as climate change impacts increase further into the future. However, given the relatively minor change in the construction period (approximately four years), no material changes are expected, and the outcome of the assessments presented in the Keadby CCS ES would remain the same (**no significant effects**).

### Cumulative Effects

A review of additional committed development identified for the KNGPS EIA (see Table 1) did not identify any changes which would give rise to new or different likely significant cumulative impacts. The conclusion of the original ES (**no significant effects**) remains valid.

### Conclusion

There would be **no materially new or different likely significant effects** in relation to climate change and sustainability compared to the original certified ES conclusions if the deadline for commencement of the authorised Keadby CCS development is extended by approximately four years.

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| Topic                         | Materially new or different likely significant effect? | Environmental appraisal                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
|-------------------------------|--------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Major accidents and disasters | No                                                     | <p><u>Baseline</u></p> <p>The major accidents and disasters baseline presented in the certified Keadby CCS ES has been reviewed against that presented in the KNGPS ES. There are not considered to be any substantial differences in the current baselines presented.</p> <p>No additional current receptors have been identified within the study area (1 km for Control of Major Accident Hazard (COMAH) sites and 500 m for Hazardous Substances Consent (HSC) sites) although some further industrial sites were identified outside these boundaries. These sites are subject to their own safety protocols and due to the distances involved, further assessment of domino effects can be screened out.</p> <p>As noted in the climate change and sustainability section above, climate change impacts would increase but the change will not be material due to the commencement date being delayed by only approximately four years.</p> <p>As noted in the traffic and transport section above, background traffic volumes may increase slightly between 2029 and 2033, but that this is not expected to be a material change.</p> |

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### Construction (and Decommissioning) Effects

The small potential changes to baseline between 2029 and 2033 noted above relating to climate change and baseline traffic would not result in a material change to risk events related to extreme weather and road traffic accidents.

As there are no changes to the location, design, scale, or construction activities, and the baseline is materially unchanged, the outcome of the certified ES would remain the same: that all identified risk events are tolerable if ALARP and therefore **not significant**. The same conclusion is made for the decommissioning phase.

### Operation Effects

As there are no changes to the location, design, scale, or operational characteristics, and the baseline is materially unchanged, the outcome of the certified ES would remain the same: that all identified risk events are tolerable if ALARP and therefore **not significant**.

### Cumulative Effects

Major accidents and disasters is not generally considered within the cumulative effects assessment because the assessment of cumulative effects is inherent in the major accidents and disasters assessment, in particular domino effects. Of the committed developments in Table 1, the Humber Carbon Capture Pipeline, Moors Solar Farm and Pilfrey Solar Farm fall within 1 km but given the nature of

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| Topic        | Materially new or different likely significant effect? | Environmental appraisal                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
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|              |                                                        | <p>these developments and existing controls (such as the Pipelines Safety Regulations 1994) there is no potential for domino effects.</p> <p>Therefore the outcome of the certified ES would remain the same: that all identified risk events are tolerable if ALARP and therefore <b>not significant</b>.</p> <p><u>Conclusion</u></p> <p>There would be <b>no materially new or different likely significant effects</b> in relation to major accidents and disasters compared to the original certified ES conclusions if the deadline for commencement of the authorised Keadby CCS development is extended by approximately four years.</p> |
| Human health | No                                                     | <p>A standalone human health chapter was not included within the Keadby CCS ES but human health was addressed within Appendix 16A: Population and Health Signposting, which summarised the relevant technical assessments presented elsewhere in the ES and identified where potential effects on human health and wellbeing were considered. Accordingly, this review follows the same approach, considering the findings of the relevant technical assessments to determine whether any changes have occurred that could materially affect the previous conclusions.</p>                                                                       |

| Topic | Materially new or different likely significant effect? | Environmental appraisal                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
|-------|--------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|       |                                                        | <p><u>Baseline</u></p> <p>The assessment was based on publicly available baseline health, demographic and environmental data. No changes to the baseline are anticipated that would materially alter the assessment of likely significant health effects. The only potential change is forecast population growth within the study area; however, this is expected to be modest given the change of only approximately four years and is unlikely to materially influence baseline health conditions, demand for healthcare services, or the sensitivity of the receiving population. The original baseline therefore remains valid.</p> <p><u>Construction (including Decommissioning) Effects</u></p> <p>As the locations of the works and the construction plant and processes to be used are expected not to change no changes have been identified that would give rise to materially new or different construction effects on human health. The conclusion of <b>no significant</b> effects remains valid.</p> <p><u>Operation Effects</u></p> <p>As there would be no change to the design or location of the Keadby CCS development, no material changes to human health amenity impacts would occur,</p> |

| Topic | Materially new or different likely significant effect? | Environmental appraisal                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
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|       |                                                        | <p>and there would be no materially new or different effects. The conclusion of <b>no significant</b> effects remains valid.</p> <p><u>Cumulative Effects</u></p> <p>A review of additional committed development identified for the KNGPS EIA (see Table 1) did not identify any changes that would cause any new or different likely significant effects. The conclusion of <b>no significant</b> effects remains valid.</p> <p><u>Conclusion</u></p> <p>There would be <b>no materially new or different likely significant effects</b> in relation to human health compared to the original certified ES conclusions if the deadline for commencement of the authorised Keadby CCS development is extended by approximately four years.</p> |
| Waste | No                                                     | <p>A waste ES chapter was not included in the Keadby CCS ES but an assessment of waste was provided in a technical note in response to Section 51 advice.</p> <p>Operational, decommissioning and cumulative effects were not required to be assessed in the Waste Technical Note.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                          |

| Topic | Materially new or different likely significant effect? | Environmental appraisal                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
|-------|--------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|       |                                                        | <p><u>Baseline</u></p> <p>The baseline conditions identified in the Waste Technical Note for Keadby CCS align with those identified in the proposed KNGPS development; no material changes to baseline conditions have been identified.</p> <p><u>Construction Effects</u></p> <p>All potential waste effects were identified as <b>not significant</b>. There would be no new or different likely significant construction effects in relation to waste, compared to the assessment completed in the Waste Technical Note if the deadline for commencement of the certified Keadby CCS ES is extended by around four years, so the assessment conclusion remains valid.</p> <p><u>Conclusions</u></p> <p>There would be <b>no materially new or different likely significant effects</b> in relation to waste compared to the original Waste Technical Note conclusions if the deadline for commencement of the authorised Keadby CCS development is extended by approximately four years.</p> |

## 4.2. Review of GHG Emissions Assessment

- 4.2.1. GHG emissions reported in the Keadby CCS ES have been updated to account for downstream emissions, for the purposes of this technical note.
- 4.2.2. There has also been an update to the ISEP (2025) (formerly IEMA) guidance on assessing GHG emissions and their significance since the Keadby CCS ES was completed, with the updated guidance being applied to the KNGPS ES. For completeness, the same GHG assessment criteria have been used for the updated Keadby CCS assessment as those applied within the assessment for the KNGPS ES.
- 4.2.3. The Keadby CCS GHG assessment has also been updated on the same basis as the KNGPS GHG assessment in relation to the assumed construction and operational periods (i.e. construction commencing in 2028 and the first full year of operation in 2031).

### **Assessment Updates to Reflect the Finch Case**

- 4.2.4. To account for the upstream emissions from the supply of natural gas associated with Keadby CCS, the DESNZ 2024 scope 3 well-to-tank (WTT) emissions factor for natural gas has been applied. This factor was selected to align with the emissions factor used for the KNGPS GHG assessment.
- 4.2.5. The Keadby CCS GHG calculations have also been adjusted to account for the slight change in the emissions factor for direct (scope 1) emissions associated with combustion of natural gas between the 2020 factor (used in the Keadby CCS ES) and the 2024 factor (used in the KNGPS ES). This adjustment has been made for reasons of consistency.
- 4.2.6. The impacts associated with the downstream carbon dioxide transportation and storage (T&S) network have also been accounted for in two ways, as described below.
- 4.2.7. Firstly, the downstream network experiences planned and unplanned outages for maintenance. It is assumed that the planned outages will be coordinated to occur when there is no energy generation occurring, so these would not affect the emissions from Keadby CCS. However, unplanned outages while Keadby CCS is generating electricity could result in emissions not being captured, and entirely unabated flue gases required to be vented to the atmosphere. A conservative 5% unavailability rate has been applied to the operational

emissions, meaning 5% of the energy captured by the CCS is assumed to be emitted unabated because the T&S network is unavailable (IEAGHG, 2025).

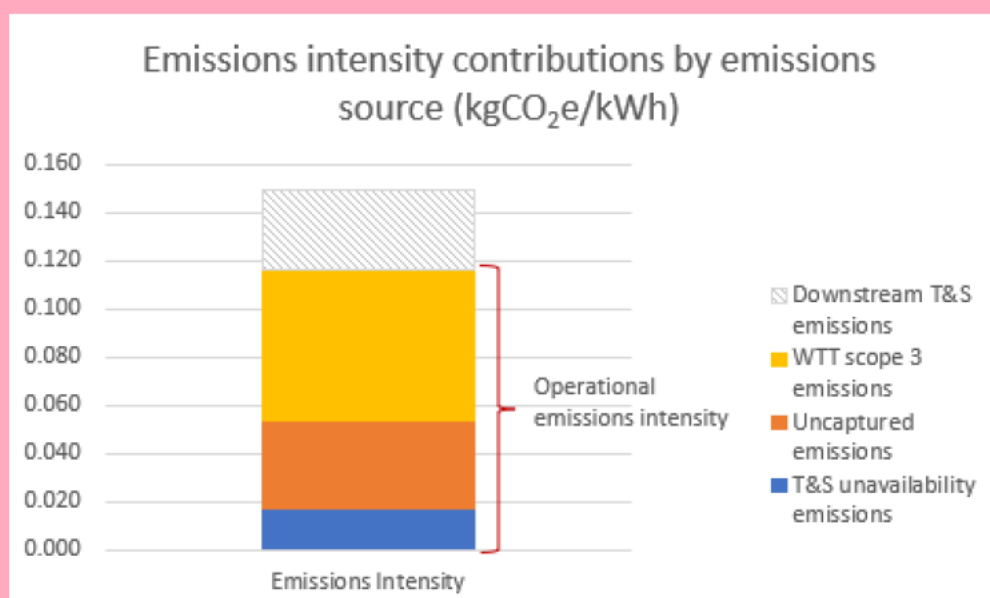
- 4.2.8. Secondly, there are also GHG emissions associated with fuel and energy consumption within the T&S network in relation to the compression, transportation and final storage of the captured carbon. Based on transportation and storage figures reported in ‘Environmental impacts of carbon capture, transport, and storage supply chains: Status and the way forward’ (Burger et al, 2024), a representative GHG emissions rate of 100 kgCO<sub>2</sub>e (kilograms of carbon dioxide equivalent) per tonne of carbon captured has been applied to the carbon dioxide stored from the Keadby CCS project.
- 4.2.9. The GHG emissions associated with the T&S network are highly variable depending on the mode and distance of transportation. However, this rate of 100 kgCO<sub>2</sub>e per tonne of carbon captured is considered to represent a typical scenario and has been used to provide an indication of the magnitude of this impact. Any deviation from this is not expected to affect the outcome of the assessment of significance presented below.
- 4.2.10. The emissions associated with the T&S network have been included in this technical note for completeness, in line with the Finch case. However, these GHG emissions have been omitted from some of the totals below (including the GHG emissions intensity reported), as equivalent emissions are not included within the GHG emissions intensities of the alternative energy generation sources against which the emissions intensity is compared. This is in line with the assessment presented in the KNGPS ES.
- 4.2.11. The updated hourly GHG emissions, as described above, are presented in Table 3Error! Reference source not found. below.

**Table 3: Updated Hourly GHG Emissions and Emissions Intensity**

| Description                                                                                         | GHG Emissions | Unit                |
|-----------------------------------------------------------------------------------------------------|---------------|---------------------|
| Unabated GHG emissions from power plant (hourly) – Adjusted based on 2020 vs 2024 emissions factors | 281,423       | kgCO <sub>2</sub> e |
| GHG emissions to atmosphere - with carbon capture (hourly) – Adjusted                               | 26,246        | kgCO <sub>2</sub> e |
| GHG emissions due to 5% T&S unavailability (hourly)                                                 | 12,759        | kgCO <sub>2</sub> e |

| Description                                                | GHG Emissions | Unit                     |
|------------------------------------------------------------|---------------|--------------------------|
| Upstream natural gas supply chain emissions (WTT) (hourly) | 45,913        | kgCO <sub>2</sub> e      |
| Emissions captured (hourly)                                | 242,419       | kgCO <sub>2</sub> e      |
| Downstream emissions on the T&S network (hourly)           | 24,242        | kgCO <sub>2</sub> e      |
| Scope 1 emissions total (hourly)                           | 39,004        | kgCO <sub>2</sub> e      |
| Scope 3 emissions total (hourly)                           | 70,155        | kgCO <sub>2</sub> e      |
| Operational emissions intensity (excludes T&S emissions)   | 0.116         | kgCO <sub>2</sub> e/ kWh |

4.2.12. **Error! Reference source not found.** shows a breakdown of the GHG emissions from Keadby CCS, in carbon intensity terms. The operational GHG emissions intensity is highlighted (in line with the intensity reported in Table 3**Error! Reference source not found.**), with downstream T&S emissions added onto the chart to demonstrate their impact on emissions.



**Figure 1: Emissions Intensity Breakdown Assessment Updates to Reflect Current ISEP Assessment Methodology**

- 4.2.13. The GHG assessment presented in the Keadby CCS ES applied a significance threshold of 1% of the existing carbon budgets at the time of the assessment. However, the KNGPS assessment applied different assessment criteria in line with the latest ISEP guidance.
- 4.2.14. The latest guidance states that it is not just the absolute emissions that should be considered, but also the contribution to decarbonisation targets and alignment with relevant policy. Please refer to the KNGPS ES for further details of the methodology applied.
- 4.2.15. Applying the same assessment criteria as presented in the KNGPS ES (see Table 18.12 of the Keadby NGPS ES Volume I, Chapter 18), the following significance rating has been determined.

**Table 4: Updated Keadby CCS Significance**

| Significance Rating             | Justification                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
|---------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Minor adverse (not significant) | <ul style="list-style-type: none"> <li>- The GHG emissions intensity of Keadby CCS is below the GHG intensity of fossil fuel production (see Plate 18.2 in the KNGPS ES Volume I, Chapter 18). Therefore, Keadby CCS would help the grid to decarbonise, as it is these higher carbon dispatchable power generation options that Keadby CCS would be replacing on the grid.</li> <li>- The GHG emissions intensity is also below that of the current grid average presented in the KNGPS ES (see Plate 18.1 in the KNGPS ES Volume I, Chapter 18).</li> <li>- The percentage contribution of emissions is below 1% for the 5<sup>th</sup>, 6<sup>th</sup> and 7<sup>th</sup> UK Carbon Budgets at 0.1%, 0.45%, and 0.83%, respectively. The percentage contribution of emissions exceeds 1% for the 8<sup>th</sup> and 9<sup>th</sup> UK Carbon Budgets at 2.24% and 15.41%, respectively.</li> <li>- Paragraphs 2.4.5 and 2.4.6 of EN-1 (DESNZ, 2024a) state: <i>“We will put in place a commercial framework which will enable developers to finance the construction and operation of power CCUS and Industrial Carbon Capture (ICC) facilities and CO2 transport and storage networks, stimulating a pipeline of projects and building a UK supply chain.”</i> And <i>“For power CCUS, we will introduce the Dispatchable Power Agreement Business Model, to incentivise power CCUS to play a role in the electricity system which complements renewables and nuclear.”</i></li> <li>- Paragraph 4.2.2 of EN-1 (DESNZ, 2024a) states: <i>“Ensuring the UK is more energy independent, resilient and secure requires the smooth transition to abundant, low-carbon</i></li> </ul> |

| Significance Rating | Justification                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
|---------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                     | <p><i>energy. The UK's strategy to increase supply of low carbon energy is dependent on deployment of renewable and nuclear power generation, alongside hydrogen and CCUS. Our energy security and net zero ambitions will only be delivered if we can enable the development of new low carbon sources of energy at speed and scale."</i></p> <ul style="list-style-type: none"> <li>- Paragraph 4.9.4 of EN-1 (DESNZ, 2024a) states natural gas power generation with CCS represents a low carbon alternative to unabated gas power generation, and that <i>"Carbon capture technologies offer the opportunity to decarbonise the electricity system whilst maintaining security of supply, providing reliable low carbon generation capacity."</i></li> </ul> <p>In conclusion, under this scenario Keadby CCS is considered to meet existing and emerging policy requirements and is considered to be fully in line with measures necessary to achieve the UK's trajectory towards net zero. Therefore, the GHG emissions are considered to be minor adverse (not significant).</p> |

4.2.16. The significance rating of minor adverse (not significant) is the same as that presented in the Keadby CCS ES.

## 5. Conclusions

- 5.1.1. Article 40(5) (described in Section 2) would allow the latest commencement date for the Keadby CCS development to be extended by around four years, from December 2029 to around November 2033.
- 5.1.2. This technical note considers how this potential delay of around four years could affect the conclusions of the certified Keadby CCS ES and concludes that there would be no materially new or different environmental effects to those reported in the certified ES.
- 5.1.3. As a result, the Keadby CCS DCO and KNGPS DCO are both considered to be in accordance with the 2024 Energy NPSs. A detailed assessment of the accordance with the relevant 2024 Energy NPS Policy is contained in Appendices 4 and 5 of the KNGPS Planning Statement (KNGPS Application Document Ref: 5.5).

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