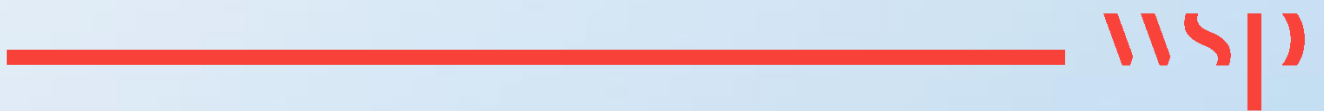


Appendix 5.14

RSPB Response



Davidson, Philip

From: Mike Pilsworth <[REDACTED]>
Sent: 09 June 2020 10:22
To: Davidson, Philip
Subject: North Killingholme Power Project

Dear Philip

Thank you for consulting the RSPB, and apologies for the delay in getting back to you we do not have any comments to make on the changes to the ecological baseline and are not aware of any significant base line changes that might be relevant to the ecological assessment.

If you have any further queries and consultation regarding this development please don't hesitate to get in touch.

Best Wishes

Mike

Mike Pilsworth

Humber Conservation Officer

RSPB England Denby Dale Office Westleigh Mews, Wakefield Rd, Denby Dale, Huddersfield, HD8 8QD

Tel [REDACTED]

Mobile [REDACTED]

rspb.org.uk

Let's give nature a home



The RSPB is the UK's largest nature conservation charity, inspiring everyone to give nature a home. Together with our partners, we protect threatened birds and wildlife so our towns, coast and countryside will teem with life once again. We play a leading role in BirdLife International, a worldwide partnership of nature conservation organisations.

The Royal Society for the Protection of Birds (RSPB) is a registered charity: England and Wales no. 207076, Scotland no. SC037654

Thank you for consulting the RSPB regarding the Non- material DCO amendment.

From: Davidson, Philip <[REDACTED]>

Sent: 03 April 2020 08:34

To: Wildlife <Wildlife@rspb.org.uk>

[REDACTED]

Subject: North Killingholme Power Project - Non-material DCO amendment

Dear Sir/Madam,

I am emailing to consult on ecological matters relating to proposed amendments to C.GEN Killingholme Limited's (C.GEN) project for the construction a new 470MWe thermal generating station at North Killingholme, North Lincolnshire. The generating station would operate as either a Combined Cycle Gas Turbine (CCGT) plant or as an Integrated Gasification Combined Cycle (IGCC) plant. An application was made for a Development Consent Order, and an order was granted by the Secretary of State on 11 September 2014 (and amended by correction order on 26 October 2015).

Since that time, C.GEN has been developing the Project for delivery, including appointing an EPC contractor and participating in the Capacity Market auctions. However, the Order has not yet been implemented. Given the time that has elapsed since the Order was granted, C.GEN is seeking amendments to the Order to extend the date by which the Order must be implemented. In order to ensure the consent remains fit for purpose, other minor modifications to the Order are proposed with regard to the carbon capture elements. However, no changes are sought to the technology used, modes of operation or the Order Limits (the extent of the project boundary remains as consented).

WSP have been employed by C.Gen to undertake the planning process to gain this approval. As part of this process, consultation is advised with key stakeholders to discuss our approach and flag any concerns. We have undertaken a review of the original Ecological Impact Assessment completed for the DCO Application. We have also completed a series of surveys to provide an updated ecological baseline for habitats and protected and notable species at and adjacent to the Site.

In brief, the changes to the proposals remain within the parameters assessed in the original EcIA. The main changes to the ecological baseline identified by our survey work in 2019/20 are as follows:

- There have been no changes to the boundaries of statutory designated sites since the 2014 ES was submitted.
- An extended Phase 1 habitat survey carried out in May 2019, found that habitats within the site remain in a similar condition and are distributed similarly to when phase 1 habitat surveys were carried out to inform the 2014 ES.
- eDNA GCN surveys in May 2019 returned a negative result for GCN in all ponds within 250m of the project boundary. This reflects the negative survey result for GCN recorded for the 2014 ES
- Targeted reptile surveys in summer 2019 recorded a negative survey result for reptiles within the project boundary. This reflects the negative survey result for reptiles recorded for the 2014 ES
- Targeted breeding, autumn passage, and wintering bird surveys recorded a similar range and distribution of bird species as were recorded during survey and desk study work to inform the 2014 ES. Species included as reasons for designation of the Humber Estuary SPA and Ramsar site continued to be absent from within the Project Boundary, or were recorded in very low numbers. Data from the last round of wintering/passage bird surveys is still being collated and has not yet been analysed.
- Water vole surveys in spring and autumn 2019 did not identify any confirmed evidence of water voles. Water voles were recorded in a small number of ditches within the Project Boundary during surveys to inform the 2014 ES.
- Otter surveys in spring and autumn 2019 recorded one otter spraint on a ditch on the edge of the Project Boundary on the second visit, with no other evidence of otters recorded. No evidence of otters was recorded within the Project Boundary during surveys to inform the 2014 ES. The site continues to lack habitats suitable for otters to establish holts or other resting-places.
- Bat activity levels recorded during activity surveys in June and September 2019 were reduced compared to activity surveys completed to inform the 2014 ES, although the pattern of use of habitats within the Project Boundary and the range of species recorded were similar.
- A low conservation significance summer day roost of pipistrelle bat (believed to be common pipistrelle (<5 individuals)) was recorded during dusk emergence/dawn re-entry surveys of one building within the Project Boundary in 2019. No bat roosts were recorded within the Project Boundary during surveys to inform the 2014 ES, although the potential for some on-site buildings to be used by low numbers of roosting bats was noted in the ES.

- Surveys during 2019 indicate that the current baseline for badgers remains similar to that recorded during surveys to inform the 2014 ES. Badger survey results will be passed to Natural England, the Local Planning Authority and The Planning Inspectorate only on a confidential basis, to avoid sensitive data entering the public realm.

We have considered the results of the survey and assessment work that informed the 2014 ES and compared it to the results of the 2019/20 survey work. In most instances the baseline has not changed substantively, or there have been apparent reductions in populations of protected or otherwise notable species (e.g. water voles; foraging bats). Where there is evidence of protected or notable species recorded in 2019 that was not recorded in 2014 (otters and confirmation of a bat roost) the level of usage of land within the Project Boundary is minimal, and/or was assessed as part of the possible future baseline in the ES (e.g the potential for bat roosts to become established in the future was recorded in the 2014 ES). As such, no changes are expected to the significance of ecological effects described in the original Environmental Statement.

C.GEN is carrying out informal consultation ahead of an application to the Planning Inspectorate in May and we invite The RSPB to provide comments on the proposed non-material amendment. If you know of any other baseline changes that may be relevant to the ecology assessment that we have not considered, we would also be grateful to hear from you. I'd be happy to discuss further on the phone or by email.

Kind regards,

Phil

Philip Davidson

Associate Director, Ecology



Kings Orchard
1 Queen Street
Bristol
BS2 0HQ

wsp.com

Confidential

This message, including any document or file attached, is intended only for the addressee and may contain privileged and/or confidential information. Any other person is strictly prohibited from reading, using, disclosing or copying this message. If you have received this message in error, please notify the sender and delete the message. Thank you.

WSP UK Limited, a limited company registered in England & Wales with registered number 01383511. Registered office: WSP House, 70 Chancery Lane, London, WC2A 1AF.

NOTICE: This communication and any attachments ("this message") may contain information which is privileged, confidential, proprietary or otherwise subject to restricted disclosure under applicable law. This message is for the sole use of the intended recipient(s). Any unauthorized use, disclosure, viewing, copying, alteration, dissemination or distribution of, or reliance on, this message is strictly prohibited. If you have received this message in error, or you are not an authorized or intended recipient, please notify the sender immediately by replying to this message, delete this message and all copies from your e-mail system and destroy any printed copies.

-LAEmlHhHzdJzBITWfa4Hgs7pbKI

This email and any attachments may contain material that is confidential, subject to copyright and intended for the addressee only. If you are not the named recipient you must not use, disclose, reproduce, copy or distribute the contents of this communication. If you have

received this in error, please contact the sender and then delete this email from your system. The Royal Society for the Protection of Birds (RSPB) is a registered charity in England and Wales no. 207076 and in Scotland no. SC037654.

The RSPB is committed to maintaining your data privacy. We promise to keep your details safe and will never sell them on to third parties. To find out more about how we use your information please read our [online Privacy Policy](#):

This email and any attachments may contain material that is confidential, subject to copyright and intended for the addressee only. If you are not the named recipient you must not use, disclose, reproduce, copy or distribute the contents of this communication. If you have received this in error, please contact the sender and then delete this email from your system. The Royal Society for the Protection of Birds (RSPB) is a registered charity in England and Wales no. 207076 and in Scotland no. SC037654.

The RSPB is committed to maintaining your data privacy. We promise to keep your details safe and will never sell them on to third parties. To find out more about how we use your information please read our [online Privacy Policy](#):