



The Planning Act 2008

Knottingley Proposed Power Plant Order

Applicant's comments CRT's submissions to Examination Deadline 8

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Author: Knottingley Power Limited

Knottingley Power Limited

Tricor Suite,

4th Floor,

50 Mark Lane

London

England EC3R 7QR

Email: info@knottingleypower.co.uk

Web: www.knottingleypower.co.uk

Introduction

This brief response document is submitted to address some of the issues raised in the deadline 8 submissions by CRT and addresses some points which are designed to assist the ExA in understanding the relative positions of the Applicant and CRT. The numbered paragraphs below reflect the relevant paragraphs in the CRT submission to deadline 8.

Glossary

| Term | Definition |
|-------------|---|
| Application | The application for a Development Consent Order accepted by PINS on 31 October 2013 for the Project |
| Applicant | Knottingley Power Limited (company number 05902446) |
| Canal | Aire & Calder Navigation Canal |
| CRT | Canal & River Trust |
| EA | Environment Agency |
| ExA | Examining Authority appointed by the Secretary of State to consider the Application |
| IS Hearing | The Issue Specific Hearing on Water Resources held on 16 July 2014 |

1 Licensing

- 1.1 The Applicant's previously stated position remains that abstraction from the Canal would be commercially unacceptable. Given the abstraction licensing procedure as described by the EA, CRT's submission to examination deadline 8 contradicts what has previously been stated by the EA. The Applicant maintains its view that pursuing abstraction from the Canal would pose a significant and unacceptable commercial risk.

2 Q95 vs. Q98 flow

- 2.1 The Applicant maintains that temperature uplift is to a very large degree governed by flow. Changes in baseline water temperature, ambient air temperature and wind speed will have a relatively limited impact on temperature increase. The Applicant also maintains its position that the Q98 flow in the Canal is appropriate to assessing compliance with the EU Directive and Regulations governing protection of freshwater fish, and on this basis, CRT's proposed abstraction and discharge flows would give rise to an unacceptable rise in temperature. Further, the Applicant's analysis indicates that when the correct inputs are used, CRT's model would show that the discharge also breaches the limit on acceptable temperature rise at the Q95 flow. The Applicant reaffirms its view that abstraction from the River Aire is the best option to reduce impacts on the aquatic environment.

3 Required flow diversion to the Canal from the River Aire

- 3.1 The Applicant maintains that the worked example in the EA guidance in the CRT Written Representation dated 11 April 2014 (ref 10021392) clearly supports its interpretation of the modelling with respect to how flow should be entered into the model. Based on this alone more water than CRT indicates would need to be diverted into the Canal under low flow condition to avoid unacceptable thermal impacts.
- 3.2 In addition, the unrealistic variation in ambient air temperature used by CRT in their modelling also suggests they have underestimated the potential thermal impact to the Canal in their calculations and additional water would need to be diverted to the Canal to avoid unacceptable thermal impacts.

4 Modelling output

- 4.1 Please see the Applicant's responses above at paragraphs 2 and 3.

5 Depleted reach

- 5.1 The Applicant maintains its view in this regard as stated in Appendix A of the Applicant's Written Summary submitted on 24 July 2014, document reference number KPL/Ex/22. The Applicant also notes the similar views expressed by the EA in its submission to deadline 7 on 24 July 2014.

6 Screen clearance

- 6.1 CRT's comments underline a lack of understanding of intake screen design. The wedge wire screen design proposed is cylindrical in construction and is submerged within the watercourse. It relies on the velocity of flow in the watercourse for effective cleaning. This type of screen is preferred by the EA as it provides the minimum impact on fish and ensures compliance with the Eels (England and Wales) Regulations 2009. CRT's comments on "the use of jetting and inclined grills to enable water to run along the grills" are not relevant to wedge wire intake screens.

7 Third party operation of assets

- 7.1 CRT's comments only address one aspect of the Applicant's concern in relation to this issue and no comments are made relating to wider issues associated with the resilience for operation of sluice gates and / or blockage of the weir by debris. Irrespective of this, the Applicant maintains its preference for retaining control of infrastructure which is critical for the ongoing operation of the power station. That can only be achieved using the River Aire option.