

From: [Andrew Law](#)
To: [Keadby 3](#)
Subject: scoping consultation - Keadby 3 Low Carbon gas Power Station
Date: 26 June 2020 16:51:44
Attachments: [Coronavirusfooter11thMayB_6c3e8bc6-670e-4d10-bb1c-419a65888e95.jpg](#)
[SCO_2020_1_Keadby Power Station - HER.docx](#)
[SCO.2020.1_Keadby 3 EIA Scoping - ecology.doc](#)
[SCR-2020-1_Keadby Power Station - Environmental Protection.docx](#)
[Keadby 3 sopinq response - highways.pdf](#)
[Keadby 3 sopinq response - drainage.pdf](#)

Good afternoon,

Please accept my apologies for the delay in providing a response to your scoping consultation dated 18 May 2020. I am aware that we have missed the deadline for providing a response and as such the comments of NLC will not be able to be incorporated into the formal scoping opinion issued in respect of this project. Notwithstanding this, I have attached the responses provided to me by the Council's technical consultee's and would be grateful if these could be forwarded to the applicant for their consideration.

Kind regards

Andrew Law
Strategic Development Officer
Development Management Team
North Lincolnshire Council
Church Square House
High Street
Scunthorpe
DN15 6NL

tel: 01724 297490

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Re: SCO/2020/1

Highwaydevelopment

Thu 18/06/2020 11:29

To: Andrew Law <Andrew.Law@northlincs.gov.uk>;

Cc: Highwaydevelopment <Highwaydevelopment@northlincs.gov.uk>;

Hi Andy,

Apologies for the delay in responding.

We would want to see all construction traffic accessing the site via the A18, not the B1392. Otherwise, I agree with the approach set out in the Traffic and Transport section of the report.

Regards

Louisa

Highway Development Control

North Lincolnshire Council

Asset and Infrastructure Services

8-9 Billet Lane

Scunthorpe

DN15 9YH

Tel: 01724 297456



From: Andrew Law

Sent: 17 June 2020 16:34

To: Andrew Taylor; Environmental health; Highwaydevelopment; LLFAdrainageteam

Cc: Annie Ward; Billy Green

Subject: SCO/2020/1

Hi All,

As far as I can see I am yet to receive a response from you on the above scoping opinion in respect of Keadby 3 (proposed DCO application). The deadline for me to provide my response to PINS has now passed; however I would like to send a response on behalf of the LPA which can then be registered on the case file and sent to the applicant. Otherwise we will have no say on the scope of the EIA submitted with the application. PINS will be issuing their formal scoping response next week and as such I will need your comments by the end of this week so that I can send them across - it will be too late for PINS to incorporate them into the scoping opinion but they will forward them to the applicant for consideration.

Please let me know if you wish to discuss further.

Kind regards

Andrew Law
Strategic Development Officer
Development Management Team
North Lincolnshire Council
Church Square House
High Street
Scunthorpe
DN15 6NL

tel: 01724 297490

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Re: SCO/2020/1 [PAPP:SCO/2020/1]

Andrew Law

Fri 26/06/2020 16:45

To: Andrew Law <Andrew.Law@northlincs.gov.uk>;



From: LLFAdrainageteam
Sent: 22 June 2020 21:30
To: Planning; Andrew Law
Subject: Re: SCO/2020/1 [PAPP:SCO/2020/1]

Hi Andrew,

The scoping report provided indicates an acceptable level of surface water drainage & flood risk information that is required to be provided as part of DCO.

Kind Regards,

**Lead Local Flood Authority
Flood Risk and Drainage Team**

North Lincolnshire Council

Asset and Infrastructure Services
8-9 Billet Lane
Scunthorpe
DN15 9YH
Tel: 01724 297522

Note: Please quote planning application reference numbers on all future correspondence



From: North Lincs Planning <planningapplications@northlincs.gov.uk>
Sent: 26 May 2020 17:05
To: Andrew Taylor; Alison Williams; Environmental health; Highwaydevelopment; LLFAdrainageteam
Subject: SCO/2020/1 [PAPP:SCO/2020/1]

Good afternoon

Your views are requested on the above Environmental Impact Assessment Scoping Report for land at and in the vicinity of the Keadby Power Station site, Trentside, Keadby.

Any comments should reach me no later than 14 days from the date of this email. In the meantime if you have any queries about the proposal these should be directed to the case officer.

If you have no comments to make then early notification of this will assist me to deal with the request promptly.

Kind Regards

Development Management

North Lincolnshire Council
Business Development
Church Square House
30-40 High Street
Scunthorpe
DN15 6NL
Email: planning@northlincs.gov.uk

Clare Allcock

Tel:01724 297487
Development Management

North Lincolnshire Council
Church Square House
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Scunthorpe
North Lincolnshire
DN15 6NL
www.northlincs.gov.uk



PLANNING CONSULTATIONS

REFERENCE: SCO/2020/1

CASE OFFICER: ANDREW LAW



TEAM: HISTORIC ENVIRONMENT RECORD

AUTHOR: ALISON WILLIAMS, HISTORIC ENVIRONMENT OFFICER

TEL: 01724 297471

EMAIL: alison.williams@northlincs.gov.uk



SUBJECT: EIA Scoping Report for The Keadby 3 Low Carbon Gas Power Station Project, Land at and in the vicinity of Keadby Power Station site, Trentside, Keadby

PARISH: KEADBY WITH ALTHORPE

DATE ISSUED: 08/06/2020

SUMMARY OF ADVICE

- Thank you for consulting the HER on this scoping report
- The proposed development has the potential for direct and indirect affects on designated and non-designated heritage assets and their settings
- Cultural Heritage is thus scoped into the EIA
- Comments re the spatial extent and methodology of the cultural heritage assessment set out in section 6 of the Scoping Report are set out below

HISTORIC ENVIRONMENT RECORD (HER) FUNCTION: To hold, maintain, interpret and manage heritage information, enhancing the understanding of the area's historical development as a distinctive and attractive place. HER information provides source material for interpretation by heritage professionals and for use by community groups and individuals. The HER database is updated as new information about the historic environment is discovered.

The HER also provides advice on development proposals that affect, or may affect, the sites and settings of all heritage assets i.e. designated and non-designated historic buildings, archaeological sites and monuments, and historic places, areas and landscapes. This advice is provided against saved local plan policies and national historic environment policies. See <https://www.northlincs.gov.uk/planning-and-environment/historic-environment-and-conservation/>

DETAILED ADVICE: Thank you for consulting the HER on this scoping report. I have the following comments to make on the content in relation to Cultural Heritage & Archaeology.

Relevant Policy

In addition to local planning policies listed in section 5, the following policies are relevant to the proposed development:

Core Strategy (2011) policy CS6 Historic Environment
Local Plan (2003) Policies LC14 Area of Special Historic Landscape Interest, and HE8 Ancient Monuments

Guidance on the Applicant's Assessment of the historic environment and heritage assets is set out in paragraphs 5.8.8 – 5.8.10 of NPS EN-1.

5.8.8 As part of the ES (see Section 4.2) the applicant should provide a description of the significance of the heritage assets affected by the proposed development and the contribution of their setting to that significance. The level of detail should be proportionate to the importance of the heritage assets and no more than is sufficient to understand the potential impact of the proposal on the significance of the heritage asset. As a minimum the applicant should have consulted the relevant Historic Environment Record¹²⁰ (or, where the development is in English or Welsh waters, English Heritage or Cadw) and assessed the heritage assets themselves using expertise where necessary according to the proposed development's impact.

5.8.9 Where a development site includes, or the available evidence suggests it has the potential to include, heritage assets with an archaeological interest, the applicant should carry out appropriate desk-based assessment and, where such desk-based research is insufficient to properly assess the interest, a field evaluation. Where proposed development will affect the setting of a heritage asset, representative visualisations may be necessary to explain the impact.

5.8.10 The applicant should ensure that the extent of the impact of the proposed development on the significance of any heritage assets affected can be adequately understood from the application and supporting documents.

Cultural Heritage Baseline

Our records show that the proposed development of Keadby III has potential for direct and indirect effects on designated and non-designated heritage assets and their settings. These heritage assets include listed buildings, scheduled monuments, a non designated historic landscape of national importance (Isle of Axholme), known and potential archaeological remains and the palaeo-environmental resource of the underlying stratigraphy. The known archaeological resource ranges in date from pre-historic artefacts, a Roman bog body, a Romano-British occupation site, through to evidence of the post-medieval drainage and warping of the former low-lying marshland.

On the east side of the Trent opposite Keadby, a number of significant Bronze Age finds have come from Burringham Common including a hoard of rapiers and a spearhead, a superb bronze shield as well as a hoard of bronze axes from the riverbed at Keadby Bridge.

Archaeological investigations have recently been undertaken on the adjacent Keadby II site. These investigations comprised a preliminary coring survey, deposit modelling and palaeoenvironmental assessment, radiocarbon 14 dating and analysis of peat deposits, trial trenching and archaeological monitoring and recording. The investigations revealed a consistent stratigraphy beneath the surface made ground comprising alluvial warp overlying a well-preserved peat in turn overlying the pre-peat land surface; the radiocarbon dates show that the peat began to form during the Late Neolithic to Early Bronze Age, and that the waterlogged conditions would have continued throughout the Bronze Age.

All these deposits have potential to contain archaeological remains, ranging in date from the Upper Palaeolithic pre-peat landscape, organic and inorganic artefacts within the prehistoric peats, to the 18th/19th century warping structures such as that excavated within the footprint of one of the Keadby wind turbines in 2014.

The proposed site is approximately 6km from Belton Open Field, one of the best preserved areas of the Isle of Axholme core historic landscape character type of the Ancient Open Strip Fields. Belton Open Field is on raised ground from where there are wide views across this historic landscape towards Keadby. The development site is within the setting of Belton Field.

Scoping Advice

Section 6 of the Scoping Report sets out the applicant's proposed methodology for the Cultural Heritage assessment.

With regard to the proposed study area (paragraph 6.178 & 6.180), an extended study area of 10km is required for the non-designated heritage asset of national importance of the Isle of Axholme historic landscape. This is comparable with the study area proposed for the LVIA. It is advised that a shared visualisation viewpoint for the Cultural Heritage assessment and the LVIA should be taken from the high point on Belton Open Field at the junction of the public rights of way at or about SE780070.

The proposed methodology is for desk-based assessment only with further archaeological assessment proposed to be undertaken post-determination (paragraph 6.182). Given the potential heritage impacts this will not produce sufficient robust information on which to base impact assessment or consider appropriate mitigation that can be built into the construction programme and timetable.

An EIA for Cultural Heritage based solely on desk based assessment would be inadequate; as such it would not be possible for the HER and planning authority to advise the Examining Authority on local impacts or agree a Statement of Common Ground. Nor would it be possible for the Examining Authority to make an informed planning decision in line with the National Policy Statement, the NPPF or the local planning policies.

In order to produce appropriate information for the EIA, the scope of the cultural heritage assessment will need to comprise an assessment based on preliminary desk based synthetic work **AND** the results of fieldwork including archaeological evaluation as follows:

1. Desk Based Synthesis

- Baseline review of existing historic environment data sources to collate and synthesise the available information relating to **all** heritage assets within each of the study areas (as advised above) to include local and national databases, local archives, historic maps and plans, aerial photographs, LIDAR, geological and geotechnical data, and published and unpublished documents
- Site visit to identify the presence of, or potential for, any above or below ground heritage assets within the development area, and any constraints on archaeological fieldwork

2. Field Evaluation

- A programme of hand and/or machine drilled coring to produce a detailed deposit model of the sub-surface topography of the application area, to identify and model the deposit sequence and former land surfaces, and provide an understanding of the development of the landscape; and to obtain appropriate samples for assessment of preservation potential and the potential for palaeo-environmental evidence to inform the archaeological record; this assessment should include all relevant palaeo-environmental indicators and provision for a programme of scientific dating of the deposit sequence; a specification for this work should be agreed with the HER;
- Dependent on ground conditions, field surveys comprising fieldwalking and geophysical survey;
- Excavation of sample trial trenches to determine the nature, extent, state of preservation and importance of any archaeological remains, such as those associated with the warping channels mapped in this area, the peat deposits and the pre-peat landscape.

3. Assessment of Significance

- Assessment of the significance of those heritage assets and their settings likely to be directly or indirectly impacted by the development; the assessment of the significance of heritage assets will take account of the combined results of all the preceding stages of desk and site based assessment, and be based on the heritage values set out in *Conservation Principles, Policies and Guidance for the sustainable management of the historic environment*, Historic England, 2008 <https://www.historicengland.org.uk/images-books/publications/conservation-principles-sustainable-management-historic-environment/>.
- The methodology of assessing the contribution of setting to significance should be undertaken as set out in Historic England's Historic Environment Good Practice Advice Note 3 (formerly 'The Setting of Heritage Assets') <https://historicengland.org.uk/images->

[books/publications/gpa3-setting-of-heritage-assets](#) The use of photographic visualisations from appropriate viewpoints in the surrounding area looking towards, from within and across the heritage assets would be of particular use to demonstrate effects of the proposals on settings, including evidence of no effects. Impacts other than visual, such as noise, dust and odour, should also be considered.

4. Assessment of Impact

- Assessment of impact of the proposed development on the significance of the heritage assets and their setting based on the findings of the preceding stages, with reference to details of proposed construction ground works, the scale, mass and height of the development and the cumulative impact with nearby developments.

If the assessment demonstrates that the significance of heritage assets will be adversely affected by the proposals, then appropriate mitigation measures should be drawn up to conserve them. This may include avoiding or minimizing effects to areas of significance, if necessary by modifying the layout and/or design of the proposals ie. In situ preservation. Alternatively, where loss of heritage assets as a result of development is considered justified, provision should be made to record the evidence before it is lost either in advance of, or during, development.

Mitigation measures should be detailed in the Environment Statement, including the provision of Written Schemes of Investigation (specification) for further archaeological recording, as may be necessary. Where a DCO may subsequently be granted, the implementation of appropriate and agreed mitigation measures can be secured by requirement.

I welcome the proposal for further consultation with the HER. This will provide the opportunity to ensure that the scope and content of the heritage assessment will be adequate and in line with national and local planning policies.

I N T E R	<h1>MEMO</h1>	North Lincolnshire Council www.northlincs.gov.uk
O F F I C E		

To: Development Management

From: Environmental Protection Team

Your Ref: SCR/2020/1

Our Ref: PLU 005146

Subject: EIA screening request relating to Keadby Power Station

Location: Keadby Power Station, Trent Side, Keadby

Date: 9 June 2020

Thank you for your memo requesting this departments comments on the above Screening Request.

The submitted documentation has been reviewed by this department. Any concerns this department may have will be addressed in an Environmental Impact Assessment, we therefore have no comments to make.

MEMO

**North
Lincolnshire
Council**

To: Andrew Law, Development Management
From: Andrew Taylor, Place Planning & Housing
Your Ref: SCO/2020/1
Date: 18 June 2020

Subject:

**Planning Act 2008 (as amended) and The Infrastructure Planning
(Environmental Impact Assessment) Regulations 2017 (the EIA Regulations)
– Regulations 10 and 11**

**Application by SSE Generation Limited (the Applicant) for an Order granting
Development Consent for the Keadby 3 Low Carbon Gas Power Station (the
Proposed Development)**

**Scoping consultation and notification of the Applicant's contact details and
duty to make available information to the Applicant if requested**

Summary

- **I support the principle of low carbon electricity generation.**
- **I support the approach taken to the assessment of ecological, landscape and visual impacts.**

Thank you for consulting Place Planning & Housing on the above EIA Scoping Request. I broadly support the approach taken in the submitted Scoping Report. I shall make one or two specific comments below:

Overall Project Rationale

I support the principle of low carbon electricity generation, which will help to deliver carbon reduction policies set out in the NPPF, UK Clean Growth Strategy, Environment Bill, Humber Clean Growth Local White Paper, North Lincolnshire Core Strategy and Local Plan Preferred Options.

I also support the proposal to positively manage areas of acid grassland and open mosaic habitats, which have been assessed as being of national importance.

Ecological Impact Assessment

I support the proposed scope of the ecological assessment. Appropriate surveys have been or will be carried out. Some of the survey work dates from 2017, which is broadly acceptable if the application is to be considered in the

near future. If much more time passes, though, some update surveys may be required. Natural England standing advice says, "Ideally surveys should be from the most recent survey season but this varies by species."

Particular importance within the ecological assessment should be given to:

- The provision of the information reasonably required for a Habitats Regulations Assessment.
- Impacts on acid grassland and open mosaic habitats, which have been assessed as being of national importance.
- Impacts on protected and priority species- a number of which have been recorded on-site.
- Avoidance, mitigation and compensation measures required to address identified impacts.
- Biodiversity enhancement measures appropriate to the scale and longevity of the project.

Landscape

We would generally advise as follows:

Landscape and visual impacts need to be considered in terms of the adopted Landscape Assessment and Guidelines and the Countryside Design Summary. I also recommend the use of the Guidelines for Landscape and Visual Impact Assessment 3rd Edition (GLVIA3, 2013), produced by the Landscape Institute and the Institute of Environmental Management & Assessment.

Core Strategy Spatial Objective 10, policies CS5 and CS16 and Saved Local Plan Policies LC7 and RD2 should also be considered.

This is what is proposed. Therefore, I support the approach taken in the submitted Scoping Report.

If you have any questions, please do not hesitate to contact me.

Andrew Taylor
Natural Environment Policy Specialist

Annex- Ecology and Legal Protection

Bats

All species of bat are protected under Schedule 5 of the Wildlife and Countryside Act 1981 (as amended) and Schedule 2 of The Conservation of Habitats and Species Regulations 2017 making all species of bat European Protected Species. Details of the legislation can be found at:

Wildlife and Countryside Act

<http://www.legislation.gov.uk/ukpga/1981/69/contents>

The Countryside and Rights of Way Act:

http://www.opsi.gov.uk/acts/acts2000/ukpga_20000037_en_7#pt3-pb8-l1g81

The Conservation of Habitats and Species Regulations 2010

http://www.opsi.gov.uk/si/si2010/uksi_20100490_en_1

Nesting birds

It is an offence under Section 1 of the Wildlife and Countryside Act of 1981(WCA 1981) to intentionally take, damage or destroy the nest of any wild bird while it is in use or being built. The WCA 1981 also provides that all wild birds and their eggs are protected and cannot be killed or taken except under licence.