

# KEADBY 3 CARBON CAPTURE POWER STATION

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A collaboration between **SSE Thermal** and **Equinor**

**Document Ref: 8.11**

**Planning Inspectorate Ref: EN010114**

**The Keadby 3 (Carbon Capture Equipped Gas Fired Generating Station) Order**

**Land at and in the vicinity of the Keadby Power Station site,  
Trentside, Keadby, North Lincolnshire**

**Statement of Common Ground with Trinity  
House/Associated British Ports**

**The Planning Act 2008**

**Applicant: Keadby Generation Limited**

**Date: December 2021**

## DOCUMENT HISTORY

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| <b>Author</b>         | AECOM Limited |             |               |
| <b>Signed</b>         | Susan Evans   | <b>Date</b> | December 2021 |
| <b>Approved By</b>    |               |             |               |
| <b>Signed</b>         | Richard Lowe  | <b>Date</b> | December 2021 |
| <b>Document Owner</b> | AECOM         |             |               |

## GLOSSARY

| <b>Abbreviation</b> | <b>Description</b>                            |
|---------------------|---|
| ABP                 | Associated British Ports                      |
| AGI                 | Above ground installation                     |
| AIL                 | Additional Abnormal Indivisible Load          |
| CCGT                | Combined Cycle Gas Turbine                    |
| CCP                 | Carbon dioxide capture plant                  |
| DCO                 | Development Consent Order                     |
| DML                 | Deemed Marine Licence                         |
| EIA                 | Environmental Impact Assessment               |
| ES                  | Environmental Statement                       |
| HP                  | High pressure                                 |
| HRSG                | Heat Recovery Steam Generator                 |
| MMO                 | Marine Management Organisation                |
| MW                  | megawatts                                     |
| NLC                 | North Lincolnshire Council                    |
| NSIP                | Nationally Significant Infrastructure Project |
| PCC                 | Proposed Power and Carbon Capture             |
| PINS                | Planning Inspectorate                         |
| SoCG                | Statement of Common Ground                    |
| SoS                 | The Secretary of State                        |
| ZCH                 | Zero Carbon Humber                            |

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## 1.0 INTRODUCTION

### 1.1 Overview

- 1.1.1 This Statement of Common Ground ('SoCG') with Trinity House/Associated British Ports (ABP) (**Application Document Ref. 8.11**) has been prepared on behalf of Keadby Generation Limited ('the Applicant') which is a wholly owned subsidiary of SSE plc. It forms part of the application (the 'Application') for a Development Consent Order (a 'DCO'), that has been submitted to the Secretary of State (the 'SoS') for Business, Energy and Industrial Strategy, under Section 37 of 'The Planning Act 2008' (the '2008 Act').
- 1.1.2 The Applicant is seeking development consent for the construction, operation and maintenance of a new low carbon Combined Cycle Gas Turbine (CCGT) Generating Station ('the Proposed Development') on land at, and in the vicinity of, the existing Keadby Power Station, Trentside, Keadby, Scunthorpe DN17 3EF (the 'Proposed Development Site').
- 1.1.3 The Proposed Development is a new electricity generating station of up to 910 megawatts (MW) gross electrical output, equipped with carbon capture and compression plant and fuelled by natural gas, on land to the west of Keadby 1 Power Station and the (under commissioning) Keadby 2 Power Station, including connections for cooling water, electrical, gas and utilities, construction laydown areas and other associated development. It is described in **Chapter 4: The Proposed Development of the Environmental Statement (ES) (ES Volume I - APP-047)**.
- 1.1.4 The Proposed Development falls within the definition of a 'Nationally Significant Infrastructure Project' (NSIP) under Section 14(1)(a) and Sections 15(1) and (2) of the 2008 Act, as it is an onshore generating station in England that would have a generating capacity greater than 50MW electrical output (50MWe). As such, a DCO application is required to authorise the Proposed Development in accordance with Section 31 of the 2008 Act.
- 1.1.5 The DCO, if made by the SoS, would be known as 'The Keadby 3 (Carbon Capture Equipped Gas Fired Generating Station) Order' ('the Order').

### 1.2 The Proposed Development

- 1.2.1 The Proposed Development will work by capturing carbon dioxide emissions from the gas-fired power station and connecting into the Zero Carbon Humber (ZCH) Partnership export pipeline and gathering network for onward transport to the Endurance saline aquifer under the North Sea.
- 1.2.2 The Proposed Development would comprise a low carbon gas fired power station with a gross electrical output capacity of up to 910MWe and associated buildings, structures and plant and other associated development defined in the

Schedule 1 of the draft DCO (**APP-005**) as Work No. 1 – 11 and shown on the Works Plans (**APP-012**).

1.2.3 At this stage, the final technology selection cannot yet be made as it will be determined by various technical and economic considerations and will be influenced by future UK Government policy and regulation. The design of the Proposed Development therefore incorporates a necessary degree of flexibility to allow for the future selection of the preferred technology in the light of prevailing policy, regulatory and market conditions once a DCO is made.

1.2.4 The Proposed Development will include:

- a carbon capture equipped electricity generating station including a CCGT plant (**Work No. 1A**) with integrated cooling infrastructure (**Work No. 1B**), and carbon dioxide capture plant (CCP) including conditioning and compression equipment, carbon dioxide absorption unit(s) and stack(s) (**Work No. 1C**), natural gas receiving facility (**Work No. 1D**), supporting uses including control room, workshops, stores, raw and demineralised water tanks and permanent laydown area (**Work No. 1E**), and associated utilities, various pipework, water treatment plant, wastewater treatment, firefighting equipment, emergency diesel generator, gatehouse, chemical storage facilities, other minor infrastructure and auxiliaries/ services (all located in the area referred to as the 'Proposed Power and Carbon Capture (PCC) Site' and which together form **Work No. 1**);
- natural gas pipeline from the existing National Grid Gas high pressure (HP) gas pipeline within the Proposed Development Site to supply the Proposed PCC Site including an above ground installation (AGI) for National Grid Gas's apparatus (**Work No. 2A**) and the Applicant's apparatus (**Work No. 2B**) (the 'Gas Connection Corridor');
- electrical connection works to and from the existing National Grid 400kV Substation for the export of electricity (**Work No. 3A**) (the 'Electrical Connection Area to National Grid 400kV Substation');
- electrical connection works to and from the existing Northern Powergrid 132kV Substation for the supply of electricity at up to 132kV to the Proposed PCC Site, and associated plant and equipment (**Work No. 3B**) (the 'Potential Electrical Connection to Northern Powergrid 132kV Substation');
- Water Connection Corridors to provide cooling and make-up water including:
  - underground and/ or overground water supply pipeline(s) and intake structures within the Stainforth and Keadby Canal, including temporary cofferdam (**Work No. 4A**) (the 'Canal Water Abstraction Option');
  - in the event that the canal abstraction option is not available, works to the existing Keadby 1 power station cooling water supply pipelines and

- 
- intake structures within the River Trent, including temporary cofferdam (**Work No. 4B**) (the 'River Water Abstraction Option');
  - 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 (**Work No. 5**) (the 'Water Discharge Corridor');
  - towns water connection pipeline from existing water supply within the Keadby Power Station for potable water (**Work No. 6**);
  - above ground carbon dioxide compression and export infrastructure comprising an above ground installation (AGI) for the undertaker's apparatus including deoxygenation, dehydration, staged compression facilities, outlet metering, and electrical connection (**Work No. 7A**) and an above ground installation (AGI) for National Grid Carbon's apparatus (**Work No. 7B**);
  - new permanent access from A18, comprising the maintenance and improvement of an existing private access road from the junction with the A18 including the western private bridge crossing of the Hatfield Waste Drain (**Work No. 8A**) and installation of a layby and gatehouse (**Work No. 8B**), and an emergency vehicle and pedestrian access road comprising the maintenance and improvement of an existing private track running between the Proposed PCC Site and Chapel Lane, Keadby and including new private bridge (**Work No. 8C**);
  - temporary construction and laydown areas including contractor facilities and parking (**Work No. 9A**), and access to these using the existing private roads from the A18 and the existing private bridge crossings, including the replacement of the western existing private bridge crossing known as 'Mabey Bridge' over Hatfield Waste Drain (**Work No. 9B**) and a temporary construction laydown area associated with that bridge replacement (**Work No. 9C**);
  - temporary retention, improvement and subsequent removal of an existing Additional Abnormal Indivisible Load Haulage Route (**Work No. 10A**) and temporary use, maintenance, and placement of mobile crane(s) at the existing Railway Wharf jetty for a Waterborne Transport Offloading Area (**Work No. 10B**);
  - landscaping and biodiversity enhancement measures (**Work No. 11A**) and security fencing and boundary treatments (**Work No. 11B**); and
  - minor associated development.
- 1.2.5 The Proposed Development includes the equipment required for the capture and compression of carbon dioxide emissions from the generating station so that it is capable of being transported off-site. ZCH Partnership will be responsible for the construction, operation and decommissioning of the carbon dioxide gathering network linking onshore power and industrial facilities including the Proposed Development in the Humber Region. The carbon

dioxide export pipeline does not, therefore, form part of the Proposed Development and is not included in the Application but will be the subject of separate consent applications by third parties, such as the Humber Low Carbon Pipeline DCO Project by National Grid Ventures.

- 1.2.6 The Proposed Development is designed to be capable of operating 24 hours per day, 7 days a week, with plant operation dispatchable to meet electricity demand and with programmed offline periods for maintenance. It is anticipated that in the event of CCP maintenance outages, for example, it could be necessary to operate the Proposed Development without carbon capture, with exhaust gases from the CCGT being routed via the Heat Recovery Steam Generator (HRSG) stack.
- 1.2.7 Various types of associated and ancillary development further required in connection with and subsidiary to the above works are detailed in Schedule 1 'Authorised Development' of the draft DCO (**APP-005**). This along with **Chapter 4: The Proposed Development in the ES Volume I (APP-047)** provides further description of the Proposed Development. The areas within which each numbered Work (component) of the Proposed Development are to be built are defined by the coloured and hatched areas on the Works Plans (**APP-012**).

### 1.3 The Proposed Development Site

- 1.3.1 The Proposed Development Site (the 'Order Limits') is located within and near to the existing Keadby Power Station site near Scunthorpe, Lincolnshire and lies within the administrative boundary of North Lincolnshire Council (NLC). The majority of land is within the ownership or control of the Applicant (or SSE associated companies) and is centred on national grid reference 482351, 411796.
- 1.3.2 The existing Keadby Power Station site currently encompasses the operational Keadby 1 and Keadby 2 Power Station (under commissioning) sites, including the Keadby 2 Power Station Carbon Capture and Readiness reserve space.
- 1.3.3 The Proposed Development Site encompasses an area of approximately 69.4 hectares (ha). This includes an area of approximately 18.7ha to the west of Keadby 2 Power Station in which the generating station (CCGT plant, cooling infrastructure and CCP) and gas connection will be developed (the Proposed PCC Site).
- 1.3.4 The Proposed Development Site includes other areas including:
- a high pressure gas pipeline to supply the CCGT including a gas compound for National Grid Gas's (NGG) apparatus and a gas compound for the Applicant's apparatus;



- the National Grid 400kV Substation located directly adjacent to the Proposed PCC Site, through which electricity generated by the Proposed Development will be exported;
- Emergency Vehicle Access Road and Potential Electrical Connection to Northern Powergrid Substation;
- Water Connection Corridors:
  - Canal Water Abstraction Option which includes land within the existing Keadby Power Station site with an intake adjacent to the Keadby 2 Power Station intake and pumping station and interconnecting pipework;
  - River Water Abstraction Option which includes a corridor that spans Trent Road and encompasses the existing Keadby Power Station pumping station, below ground cooling water pipework, and infrastructure within the River Trent; and
  - a Water Discharge Corridor which includes an existing discharge pipeline and outfall to the River Trent and follows a route of an existing easement for Keadby 1 Power Station;
- an existing river wharf at Railway Wharf (the Waterborne Transport Offloading Area) and existing temporary haul road into the into the existing Keadby 1 Power Station Site (the 'Additional Abnormal Indivisible Load (AIL) Route');
- a number of temporary Construction Laydown Areas on previously developed land and adjoining agricultural land; and
- land at the A18 Junction and an existing site access road, including two existing private bridge crossing of the Hatfield Waste Drain lying west of Pilfrey Farm (the western of which is known as Mabey Bridge, to be replaced, and the eastern of which is termed Skew Bridge) and an existing temporary gatehouse, to be replaced in permanent form.

1.3.5 In the vicinity of the Proposed Development Site the River Trent is tidal. Therefore, parts of the Proposed Development Site are within the UK marine area. No harbour works are proposed.

1.3.6 Further description of the Proposed Development Site and its surroundings is provided in **Chapter 3: The Site and Surrounding Area** in ES Volume I (**APP-046**).

## 1.4 The Development Consent Process

1.4.1 As a NSIP project, the Applicant is required to seek a DCO to construct, operate and maintain the generating station, under Section 31 of the 2008 Act. Sections 42 to 48 of the 2008 Act govern the consultation that the promoter must carry out before submitting an application for a DCO and Section 37 of the 2008 Act



governs the form, content and accompanying documents that are required as part of a DCO application.

- 1.4.2 An application for development consent for the Proposed Development has been submitted to and accepted for examination by the Planning Inspectorate (PINS) acting on behalf of the Secretary of State. PINS is now examining the Application and will make a recommendation to the Secretary of State, who will then decide whether to make (grant) the DCO.

## **1.5 The Purpose and Structure of this Document**

- 1.5.1 The purpose of this document is to summarise clearly the agreements reached between the Applicant and Trinity House/ABP ('the Parties') on matters relevant to the examination of the Application and to assist the Examining Authority. It has been prepared with regard to the guidance in 'Planning Act 2008: examination of application for development consent' (Department for Communities and Local Government, March 2015).

- 1.5.2 This version of the document summarises the agreements reached between the Parties regarding matters listed below:

- Draft Development Consent Order, Protective Provisions; and
- The effect on navigational safety.

## **1.6 Status of this version**

- 1.6.1 This is the first draft of this SoCG.

- 1.6.2 The document is structured as follows:

- Section 2 – summarises the role of Trinity House/ ABP;
- Section 3 - sets out details of consultation with Trinity House/ ABP to date;
- Section 4 - sets out the matters agreed between the parties in respect of the Application; and
- Section 5 – sets out any matters that are yet to be agreed and where discussions are on-going between the parties and summarises next steps.

## **2.0 THE ROLE OF TRINITY HOUSE/ ASSOCIATED BRITISH PORTS**

- 2.1.1 ABP is a UK based ports group that operates 21 ports within the UK. ABP is also the statutory harbour authority in respect of the Proposed Development.
- 2.1.2 Trinity House is a charity dedicated to safeguarding shipping and seafarers with a statutory duty as a General Lighthouse Authority to deliver reliable, efficient and cost-effective aids to navigation service for the benefit and safety of all mariners.

### 3.0 SUMMARY OF CONSULTATION

3.1.1 Consultation and technical engagement has been ongoing with ABP since the scoping stage for the Proposed Development (June 2020) whilst consultation with Trinity House commenced at formal consultation stage. Consultation comments received from Trinity House/ ABP for the Proposed Development are presented in Table 3.1 below.

**Table 3.1: Consultation Summary**

| Date  | Details   |
|---|---|
| June 2020 (consultation on Environmental Impact Assessment (EIA) Scoping) | ABP as harbour authority was consulted by PINS in respect of a request made by the Applicant for an EIA Scoping Opinion for the Proposed Development in June 2020. No response was received.  |
| January/ (formal Stage 2 Consultation/response)                           | ABP and Trinity House were consulted. No response was provided by ABP. Trinity House responded confirming that they are primarily concerned with the works that are to take place below the high-water mark. Therefore, as these works lie within the jurisdiction of ABP Humber, it was advised that all marine safety risk mitigation measures should be agreed with ABP Humber in the first instance.  |
| February 2021   | <p>Trinity House attended a joint workshop with the Marine and Coastguard Agency (MCA) to inform the Navigational Risk Assessment and potential risks associated with the use of a cofferdam within the River Trent. ABP attended a joint workshop with the Canal and River Trust ('the Trust') for the same purpose and in particular, to build on lessons learned from construction of Keadby 2 Power Station.</p> <p>It was agreed that as part of the NRA, engagement should be carried out with a number of commercial and recreational consultees including the appropriate navigational authority, ABP</p> |

| Date  | Details   |
|---|---|
|   | <p>Humber, and the Scunthorpe Sea Cadets. It was agreed that ABP would provide vessel data to the Applicant to inform the NRA and that assumptions on the cofferdam would be given further consideration.</p>   |
| <p>April 2021 (Publicity of Draft Application and Targeted Re-Consultation under Section 42 of the Planning Act 2008)</p> | <p>ABP confirmed that the refinement of the oversail areas at the Waterborne Transport Offloading Area (Railway Wharf) in the River Trent will not impact upon their operations in the River Trent and expressed the desire to see use of Railway Wharf for the transport of abnormal loads aligning with the parameters set out and used in the Keadby 2 Project.</p> <p>ABP requested additional information on the cofferdam in order to conduct additional assessment and to determine the potential for it to cause disruption or be a navigational hazard to commercial vessels while in place. To reduce the navigational risk posed by the cofferdam, ABP suggested that any construction should not encroach any more into the river than existing Keadby 1 Power Station infrastructure does.</p> |
| <p>April/ May 2021 pre-submission DML review</p>  | <p>The Applicant provided a copy of the draft Deemed Marine Licence (DML) to ABP to enable review before submission of the Application. Comments were provided by ABP on wording of draft conditions including on the methodology for return of documents and bathymetry.</p>   |
| <p>August 2021 additional technical engagement</p>  | <p>The Applicant wrote to ABP and to Trinity House to discuss the status of the submitted Application, any queries arising following review of the draft DCO and Application documents, the examination process and the preparation of a SoCG.</p>  |

| Date  | Details   |
|---|---|
|   | <p>ABP and the Applicant met in order to discuss matters previously raised in relation to the River Water Abstraction Option and potential cofferdam.</p> <p>Trinity House confirmed that they are satisfied that the Proposed Development will have a negligible impact on marine navigation safety in the area and advised that they would not be registering as an interested party. Trinity House advised that ABP Humber would be able to provide appropriate navigation safety advice during the examination.</p> |
| <p>October 2021 additional technical engagement</p> | <p>The Applicant provided responses to the matters ABP raised at the meeting in August 2021. Additional information was provided by the Applicant in relation to the extent of cofferdam protrusion into the River Trent relative to the existing infrastructure, (rather than MHWS); information on cofferdam duration and timings and clarification on the extent of permanent infrastructure in the river. The information provided is presented in Appendix 1.</p>  |

## 4.0 MATTERS AGREED

4.1.1 The below Table 4.1 contains a list of ‘matters agreed’ along with a concise commentary of what the item refers to and how it came to be agreed between the two parties.

**Table 4.2: List of Matters Agreed between the Applicant and Trinity House/ABP**

| Matter Agreed       | Commentary  |
|---------------------|---|
| Consultation        | <p>A summary of pre-application consultation is contained in the Consultation Report (<b>APP-030</b>) and in Section 3 of this SoCG. It is agreed that the consultation summary in Section 3 of this SoCG provides an accurate record of consultation with Trinity House/ ABP on application matters to date.</p>   |
| Navigational Safety | <p>The assessment of navigational risks is set out in Appendix 12C (<b>APP-086</b>).</p> <p>The Parties agree that the approach taken by the Applicant to assess the effects of the Proposed Development on navigational risk and safety within the River Trent is appropriate (including methodology of assessment, baseline data, approach to assessment and analysis). It is agreed that the additional information provided by the Applicant in October 2021 (Appendix 1) addresses ABP’s remaining points of clarification sought from the Applicant and that ABP is satisfied that following a minor correction in section 4.2.6 of <b>APP-086</b> (update version 1.1 will be submitted into examination) that the navigation risk assessment provides an appropriate assessment of risks to navigation and safety within the River Trent.</p> <p>It is agreed that the conditions of the draft DCO, including DML (<b>APP-005</b>), which has been subject to review and agreement by ABP, appropriately control the design of any cofferdam required within the River Trent including lighting, pre and post works bathymetry surveys and any measures which will be installed around the toe of the cofferdam to manage risk of shoaling, (if necessary).</p> |

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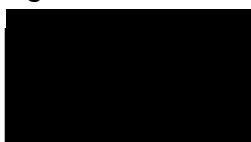
| <b>Matter Agreed</b>                              | <b>Commentary</b>   |
|---|---|
| Draft DCO including DML and Protective Provisions | It is agreed that ABP has been provided with an appropriate opportunity to review and provide feedback upon the draft DML and that the wording of the DML is accepted. No changes are sought by Trinity House/ ABP in relation to the draft DCO including DML ( <b>APP-005</b> ). |



## 5.0 MATTERS NOT AGREED AND NEXT STEPS

- 5.1.1 This SoCG sets out the agreements that have been reached between the Parties to date in respect of the matters relating to the Proposed Development requested by the ExA outlined in Section 1.7 of this SoCG.
- 5.1.2 ABP's preferred option for water abstraction would be Work 4A (Canal Water Abstraction Option) and not Work 4B (River Water Abstraction Option) in order to mitigate any risks associated with the installation of a cofferdam in the River Trent.
- 5.1.3 The Parties confirm that there are no outstanding matters to be agreed.

Signed

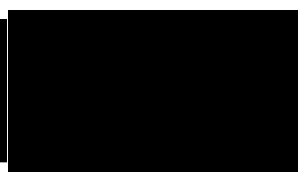


Captain Andrew Firman, Harbour Master

On behalf of Associated British Ports

Date: 16 December 2021

Signed

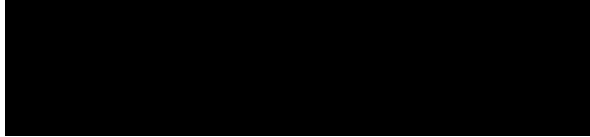


Richard Lowe, Director, AECOM Ltd

On behalf of Keadby Generation Ltd

Date: 16 December 2021

Signed



Stephen Vanstone, Navigation Services Officer

On behalf of Trinity House

Date: 16 December 2021

Signed



Richard Lowe, Director, AECOM Ltd

On behalf of Keadby Generation Ltd

Date: 16 December 2020

## 6.0 REFERENCES

HM Government (2020a) *Energy White Paper, Powering our Net Zero Future.*

SSE (2020) *A Greenprint for Building a Cleaner More Resilient Economy.*

SSE plc (2020b) *Our Strategy.*

## APPENDIX 1

15 October 2021

Captain A Firman  
Associated British Ports  
Humber Estuary Services,  
Port Office,  
Cleethorpe Road,  
Grimsby,  
N E Lincolnshire  
DN31 3LL

## **The Keadby 3 Low Carbon Gas Power Station Project – ongoing consultation with ABP Humber**

Dear Captain Firman,

Thank you for meeting with AECOM on Thursday 26<sup>th</sup> August 2021 via MS Teams, in which we discussed the Keadby 3 Low Carbon Gas Power Station Project and matters raised by ABP Humber related to the Proposed Development, in particular the potential River Water Abstraction Option. ABP Humber requested further information on a number of matters related to the potential River Water Abstraction Option, which we are pleased to provide below.

### **Cofferdam need and assessment undertaken in the environmental impact assessment (EIA)**

As discussed at the meeting, the potential River Water Abstraction Option is not the Applicant's preferred option for the supply of cooling water for the Proposed Development, however its use may be required if sufficient water cannot be sourced from the canal, and discussions are ongoing with the Environment Agency on this point. Therefore, in line with the principles of the Rochdale Envelope, the use of a cofferdam to maintain and/ or construct works necessary for the supply of water to the Proposed Development has been assessed within the EIA submitted to accompany the DCO Application.

A worst-case extent of the cofferdam has been assessed through the EIA process; an indicative plan indicating this worst-case scenario for the cofferdam is included as Figure 12C.10 of the Navigation Risk Assessment, which shows a protrusion of the cofferdam up to 22m into the River Trent from Mean High Water Springs (MHWS). At the Teams Meeting on Thursday 26<sup>th</sup> August 2021, ABP Humber requested a figure showing the extent of cofferdam protrusion into the River Trent relative to the existing infrastructure, rather than MHWS. The approximate extent of the apron associated with the Keadby Power Station intake (based on original drawings which have been subsequently digitised) is shown in **Appendix A**.

The potential extent of the cofferdam cannot be minimised further at this planning stage given the need to use worst-case assumptions for assessment in accordance with Rochdale Envelope principles in EIA. The actual working area for a contractor to utilise, if the River Water Abstraction Option is taken forward, would likely be refined down from this maximum extent and subject to initial inspections, the detailed design would seek to minimise the extent of any cofferdam required so as to minimise impacts to mariners and to the wider environment at this location (which is afforded statutory protection for biodiversity (Humber Estuary Ramsar/Special Protection Area (SPA) and Site of Special Scientific Interest (SSSI)).

### **Cofferdam duration and timings**

If the River Water Abstraction Option is pursued, it is anticipated that the cofferdam will be required for two separate periods, with an intervening gap. The first circa three-month period will comprise inspections, measurements and cleaning of the existing structure to inform the detailed design of works required to upgrade or reconstruct the existing infrastructure. The installation would take place during the second period which it is envisaged may be up to circa five months. A two-stage cofferdam installation would reduce the duration of the cofferdam being present in the water, and consequently, reduce potential navigational risks.

To ensure legal compliance, the timing for any cofferdam installation and removal in the River Trent will need to take into account the potential for the upstream migration of adult Salmon during their most sensitive migratory period and will therefore avoid the period September – November. The timing of cofferdam installation and removal outside of this period will consider the requirement to minimise disturbance to other sensitive fish species and take into account relevant marine stakeholders feedback, as far as reasonably practicable.

### **Extent of permanent infrastructure within the River Trent**

If the River Water Abstraction Option is pursued, the existing Keadby Power Station intake would be modified in order to comply with the Eels Regulations. This would involve works within the pump house (e.g. new pumps) and provision of either a gravity or pumped intake which will require works, including new 2mm eel screens to achieve the maximum 0.25 m/s approach velocity to be located within the main river channel, together with provision of new silt curtains and automatic scouring systems. The position of the intake and works to the existing concrete apron for Keadby Power Station, which will be retained, will be subject to detailed design but will be within the extents of the cofferdam i.e. 22m from MHWS. It is anticipated that the structures for the intake would be comparable to existing structures, albeit these may be positioned slightly further east into the River Trent. We will also update you if and when the River Water Abstraction Option is removed from the Project.

We would welcome further dialogue with ABP Humber and if you have any further queries or would like to discuss the matter, myself or a member of the project team will be happy to organise a further meeting.

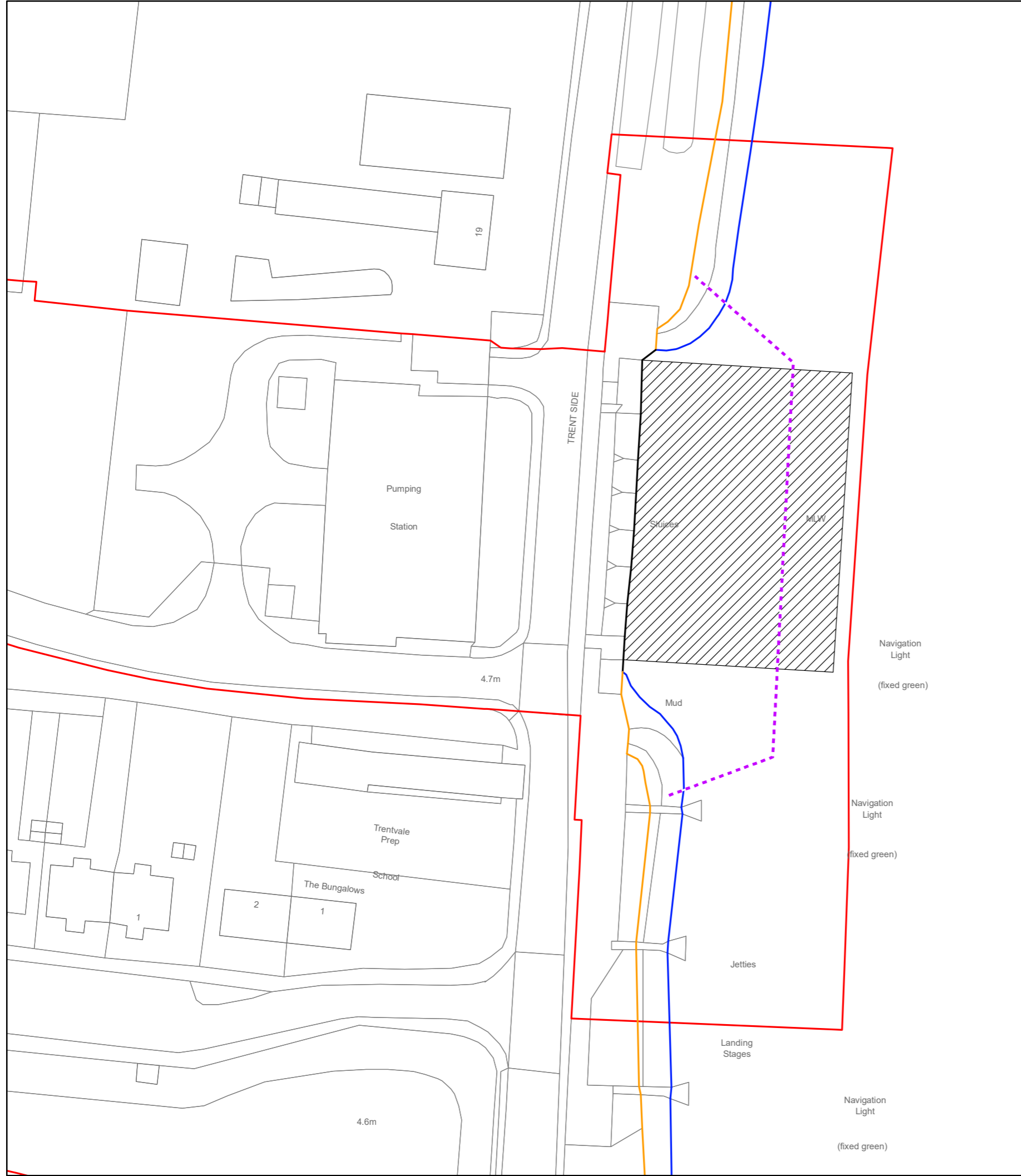
I look forward to hearing from you.

Yours sincerely,

Richard Lowe  
Director  
AECOM Limited

## Appendix A Indicative Cofferdam Plan





# AECOM

**PROJECT**  
The Keadby 3 (Carbon Capture Equipped Gas Fired Generating Station) Order

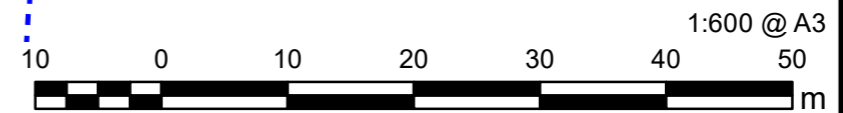
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T: 0113 391 6800  
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- LEGEND**
- The Order Limits
  - Tide Lines
    - Mean High Water (Springs)
    - Mean Low Water (Springs)
    - Mean High Water (Springs) & Mean Low Water (Springs)
  - Approximate Navigational Channel (Digitised from 1:25,000 Mapping)
  - Approximate Extent of Existing Keadby 1 Infrastructure
  - Cofferdam Model

**NOTES**  
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