KEADBY 3
CARBON CAPTURE POWER STATION

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

Document Ref: 8.15

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 National Highways

The Planning Act 2008

Applicant: Keadby Generation Limited

Date: December 2021

DOCUMENT HISTORY

Document Ref	8.15		
Revision	VP1.0		
Author	AECOM Limited		
Signed	Susan Evans	**Date**	December 2021
Approved By			
Signed	Richard Lowe	**Date**	December 2021
Document Owner	AECOM Limited		

GLOSSARY

Abbreviation	Description
AGI	Above ground installation
AIL	Abnormal Indivisible Load
CCGT	Combined Cycle Gas Turbine
CCP	Carbon dioxide capture plant
DCO	Development Consent Order
EIA	Environmental Impact Assessment
ES	Environmental Statement
HP	High pressure
HRSG	Heat Recovery Steam Generator
MW	megawatts
NLC	North Lincolnshire Council
NSIP	Nationally Significant Infrastructure Project
PA	Planning Act
PCC	Proposed Power and Carbon Capture
PINS	Planning Inspectorate
SoCG	Statement of Common Ground
SoS	The Secretary of State
SRN	Strategic Road Network
ZCH	Zero Carbon Humber

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TABLES

1.0 INTRODUCTION

1.1 Overview

1.1.1 This Statement of Common Ground ('SoCG') with National Highways (**Application Document Ref. 8.15**) 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 construction) 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 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 National Highways ('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:

- Impact of construction and operational traffic on the Strategic Road Network (SRN), including Abnormal Indivisible Loads (AIL);
- The Applicant's Transport Assessment;
- Mitigation measures, including: Framework Traffic Management Plan; and
- Framework Construction Workers Travel Plan; and Framework Construction.

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 National Highways (formerly Highways England);
- Section 3 - sets out details of consultation with National Highways 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 NATIONAL HIGHWAYS

2.1.1 National Highways is the government company charged with operating, maintaining and improving England's SRN (motorways and designated A roads).

2.1.2 National Highway's role in relation to the DCO process derives from the 2008 Act and secondary legislation made under the same.

2.1.3 National Highways is a consultee under sections 42 and 56 of the 2008 Act, meaning applicants must consult with National Highways before submitting a DCO application and once an application has been accepted for examination.

3.0 SUMMARY OF CONSULTATION

3.1.1 Consultation and technical engagement has been ongoing with National Highways (whilst operating as Highways England) since the scoping stage for the Proposed Development (June 2020). Consultation comments received from National Highways for the Proposed Development are presented in Table 3.1 below.

Table 3.1: Consultation Summary

Date	Details
June 2020 (consultation on EIA Scoping)	Highways England were consulted by the Planning Inspectorate in respect of a request made by the Applicant for an EIA Scoping Opinion for the Proposed Development. The Planning Inspectorate did not receive a response that was presented within the Scoping Opinion received by the Applicant on 25 June 2020.
August 2020 (Transport Assessment Scoping Opinion)	Highways England were consulted in respect of the proposed scope of the Transport Assessment for the Proposed Development. Comments were received in relation to abnormal indivisible loads (AIL) routing implications for the M180 Junction 2, timings of deliveries and shift patters for permanent staff, distribution and assignment, use of count data for the SRN, compliance with Department for Transport (DfT) Circular 02/2013 and the approach to considering committed developments.
December 2020 (Transport Assessment – review as part of Stage II consultation / PEI Report)	Highways England were consulted during Stage II consultation in respect of the Transport Assessment for the Proposed Development and provided comments to the Applicant to be considered for the final TA.
January 2021 (formal Stage II Consultation/response)	Highways England recommended that the issue regarding of not being able to ascertain the impact of the development proposals at the SRN be revisited when the Final TA / DCO application was

Date	Details
	submitted, as that would allow Highways England to take a definitive view on the impact of the construction phase on the SRN.
April 2021 (Publicity of Draft Application and Targeted Re-Consultation under Section 42 of the Planning Act 2008)	No comments were received in relation to the additional targeted consultation.
Additional Engagement August 2021	National Highways confirmed that the Proposed Development will not materially impact the SRN and provide no objections to the grant of a DCO. It was agreed by the Parties to work towards a SoCG.

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 National Highways

Matter Agreed	Commentary
Consultation	A summary of pre-application consultation is contained in the Consultation Report (**APP-030**), and in **Chapter 10:** Traffic and Transport of ES Volume I (**APP-053**) 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 National Highways on matters to date. Post-submission of the DCO Application, further engagement was undertaken between the Parties prior to the Relevant Representation period in August 2021. This is presented in Appendix 1.
The Applicant's Transport Assessment and impact of construction and operational traffic on the SRN, including AIL	The Parties are agreed that the Traffic and Transport Chapter (**APP-053**) and Transport Assessment (**APP-074**) in ES Volumes I and II provide a satisfactory assessment of the Proposed Development effects in relation to SRN. In particular, it is agreed that the approach taken by the Applicant to assess the effects relating to traffic and transport for the Proposed Development on the SRN is appropriate (including methodology, baseline data, assumptions approach to junction modelling and data analysis). It is agreed that the residual effects of construction traffic related to the Proposed Development on the SRN, including all road sections and junctions are anticipated to be negligible and thus not significant. Notwithstanding this, the Applicant proposes to incorporate a range of good practice mitigation measures during the construction phase to minimise traffic impacts upon local highways and the SRN. This includes the provision of a Framework Construction Traffic Management Plan and Framework Construction Workers' Travel Plan (**APP-061 and APP-062** respectively) which the appointed contractor would be required to take account of in preparing a Construction

Matter Agreed	Commentary
	Traffic and Routing Management Plan and Travel Plan for construction staff. It is agreed that mitigation measures are appropriately secured by the draft DCO (**APP-005**) (Requirements 25 and 26) to ensure that the Proposed Development would not result in unacceptable impacts in traffic and transportation terms, including upon the SRN. The wording of Requirement 25 (Construction traffic management plan) and 26 (construction worker travel plan) is agreed i.e.: *"25.—(1) No part of the authorised development may commence, save for the permitted preliminary works, until a construction traffic management plan has been submitted to and, after consultation with Highways England and the highway authority, approved by the relevant planning authority.* *(2) The plan submitted and approved must be in accordance with the framework construction traffic management plan.* *(3) The plan submitted and approved must include—* *(a) details of the routes to be used for the delivery of construction materials and any temporary signage to identify routes and promote their safe use, including details of the access points to the construction site to be used by light goods vehicles and heavy goods vehicles;* *(b) details of the routing strategy and procedures for the notification and conveyance of abnormal indivisible loads, including measures to be taken to use water transport where feasible, agreed routes, and anticipated numbers of abnormal loads to be delivered on each route;* *(c) the construction programme; and* *(d) any necessary measures for the temporary protection of carriageway surfaces, the protection of statutory undertakers' plant and equipment, and any temporary removal of street furniture.* *(4) Notices must be erected and maintained throughout the period of construction at every entrance to and exit from the construction site, indicating to drivers the approved routes for traffic entering and leaving the construction site.*

Matter Agreed	Commentary
	(5) The plan must be implemented as approved unless otherwise agreed with the relevant planning authority." *"26.—(1) No part of the authorised development may commence, save for the permitted preliminary works, until a construction workers travel plan has been submitted to and, after consultation with the highway authority, approved by the relevant planning authority.* *(2) The plan submitted and approved must be in accordance with the framework construction workers travel plan.* *(3) The plan submitted and approved must include—* *(a) measures to promote the use of sustainable transport modes to and from the authorised development by construction staff;* *(b) provision as to the responsibility for, and timescales of, the implementation of those measures;* *(c) details of parking for construction personnel within the construction sites; and* *(d) a monitoring and review regime.* *(4) The approved plan must be implemented within three months of commencement of the authorised development and must be maintained throughout the construction of the authorised development unless otherwise agreed with the relevant planning authority."*
Mitigation measures, including: Framework Traffic Management Plan; and Framework Construction Workers Travel Plan.	It is agreed that the mitigation measures outlined within the Framework Construction Traffic Management Plan (**APP-061**) and Framework Construction Workers Travel Plan (**APP-062**) are appropriate.
Draft DCO	The Parties agree that it is appropriate to change the name to 'National Highways' from Highways England in Requirement 25. No additional changes are sought by National Highways in relation to the draft DCO (**APP-005**).

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 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 The Parties confirm that there are no outstanding matters to be agreed.

Signed

Richard Lowe, Director, AECOM Ltd

Signed On behalf of Keadby Generation Ltd

Date: 17 December 2021

Our ref: AA.21.05.21
Your ref: EN010114

DWD Property and Planning
6 New Bridge Street
London
EC4V 6AB

FAO: DWD (Dalton Warner Davis LLP)

Planning & Development
Highways England
Lateral
8 City Walk
Leeds LS11 9AT

Tel: 0300 470 2420

[redacted]

17/12/2021

Dear Sir/Madam,

Application by Keadby Generation Limited for the Keadby 3 Low Carbon Gas Power Station Project – EN010114

National Highways has reviewed the Statement of Common Ground, submitted in December 2021 on behalf of Keadby Generation Limited in support of the application EN010114, seeking development consent for the construction, operation and maintenance of a new low carbon Combined Cycle Gas Turbine Generating Station on land at the existing Keadby Power Station, Trentside, Keadby, Scunthorpe.

In August 2021, National Highways confirmed that technical documents submitted in support of the application did not materially change from previous iterations with only minor corrections undertaken. National Highways has previously stated the view that the proposed development will not materially impact the Strategic Road Network and have previously offered no objection to the planning application.

The Statement of Common Ground (SoCG) document submitted summarises the agreements reached between the Applicant and National Highways on matters relevant to the examination of the Application and to assist the Examining Authority.

National Highways confirm that there are no outstanding matters to be agreed. And reaffirm that the proposed development is not expected to materially impact the Strategic Road Network.

National Highways acknowledge and agree with Table 3.1 'Consultation Summary', concluding that '*National Highways confirm that the Proposed Development will not materially impact the SRN and provide no objections to the grant of a DCO'*.

National Highways also acknowledge and agree with Table 4.2, considering the list of matters agreed between the applicant and National Highways.

National Highways wishes to reiterate its previously held position of ‘No Objection’ to the planning application (PINS reference: EN010114).

On the basis of the above, I enclose National Highways formal NEPR 21-09 response recommending no objection.

I trust this response is helpful, but should you require any further information please do not hesitate to contact me.

Yours sincerely

[redacted]

Simon GP Geoghegan
Planning and Development

National Highways Planning Response (NHPR 21-09)
Formal Recommendation to an Application for Planning Permission

From: Divisional Director
Operations Directorate
Highways England.
North East Region
PlanningYNE@highwaysengland.co.uk

To: **Dalton Warner Davis LLP**

CC: transportplanning@dft.gov.uk
spatialplanning@highwaysengland.co.uk

Council's Reference: EN010114

Location: LAND AT, AND IN THE VICINITY OF, THE EXISTING KEADBY POWER STATION, TRENTSIDE, KEADBY, SCUNTHORPE, LINCOLNSHIRE, DN17 3EF

Proposal: The Keadby 3 Low Carbon Gas Power Station Project.

National Highways Ref: SE 805 101

Referring to the consultation on a planning application dated **December 3 2021** referenced above, in the vicinity of the M180 at Scunthorpe that forms part of the Strategic Road Network, notice is hereby given that National Highways' formal recommendation is that we:

a) offer no objection (see reasons at Annex A);

~~b) recommend that conditions should be attached to any planning permission that may be granted (see Annex A – National Highways recommended Planning Conditions & reasons);~~

~~c) recommend that planning permission not be granted for a specified period (see reasons at Annex A);~~

~~d) recommend that the application be refused (see reasons at Annex A)~~

Highways Act 1980 Section 175B ~~is~~/is not relevant to this application.[1]

This represents National Highways' formal recommendation and is copied to the Department for Transport as per the terms of our Licence.

Should the Local Planning Authority not propose to determine the application in accordance with this recommendation they are required to consult the Secretary of State for Transport, as set out in the Town and Country Planning (Development Affecting Trunk Roads) Direction 2018, via transportplanning@dft.gov.uk and may not determine the application until the consultation process is complete.

Signature: [redacted] **Date: December 17 2021**

Name: Simon GP Geoghegan **Position: Planning and Development**

National Highways, 2 City Walk, Leeds LS11 9AR
email: [redacted]**@highwaysengland.co.uk**

[1] Where relevant, further information will be provided within Annex A.

Annex A National Highway's assessment of the proposed development

National Highways has been appointed by the Secretary of State for Transport as a strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). The SRN is a critical national asset and as such we work to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

Recommended Approval

Reason

The Statement of Common Ground (SoCG) document submitted summarises the agreements reached between the Applicant and National Highways on matters relevant to the examination of the Application and to assist the Examining Authority.

National Highways confirm that there are no outstanding matters to be agreed. And reaffirm that the proposed development is not expected to materially impact the Strategic Road Network.

National Highways acknowledge and agree with Table 3.1 'Consultation Summary', concluding that 'National Highways confirm that the Proposed Development will not materially impact the SRN and provide no objections to the grant of a DCO'.

National Highways also acknowledge and agree with Table 4.2, considering the list of matters agreed between the applicant and National Highways.

APPENDIX 1 – CONSULTATION COMMENTS

From: Geoghegan, Simon
Sent: 12 May 2021 16:07
To: Evans, Susan
Cc: Colin Turnbull ; Scott, Jonathan (Leeds); Romanowski, Mark; Lowe, Richard
Subject: [EXTERNAL] EN010114 - Keadby 3 Low Carbon Gas Fired Generating Station

Susan

Thank you very much for the extensive document set provided in response to our earlier review for Keadby 3 Low Carbon Gas Fired Generating Station.

I wont keep you in suspense any longer. We have concluded;

Having reviewed the final draft versions of the TA, CTMP and CWTP, no issues or areas of concern have been identified. As such, it is considered by CH2M that they can be submitted as part of the DCO application, with Highways England recommended to offer no objection to the DCO application when it is submitted, so long as the documents reviewed here are submitted in support of the application without modification.

Our full TM is attached. I want to thank AECOM for the professionalism and the cooperative way you have worked with Highways England throughout this process, and I am sure this has benefitted all parties.

Your note of April 28 2021 implies that you will respond to PINS ahead of May 27 2021, so I will leave that to you. However, if you would rather our response was made from a Highways England address, I will be happy to draft one from my home office in Bradford and send it direct; please advise me.

Best Wishes

During the Coronavirus Pandemic in common with many of my colleagues I am working from home and no messages should be left on the Lateral Phone Number.
My personal mobile number is given below but this should only be given out to direct stakeholders with a business need.

Simon Geoghegan, Planning and Development
Highways England | Lateral | 8 City Walk | Leeds | LS11 9AT
Mobile: [redacted]

Keadby 3 Power Station – Transport Assessment, Construction Traffic Management Plan and Construction Workers Travel Plan – CH2M Review

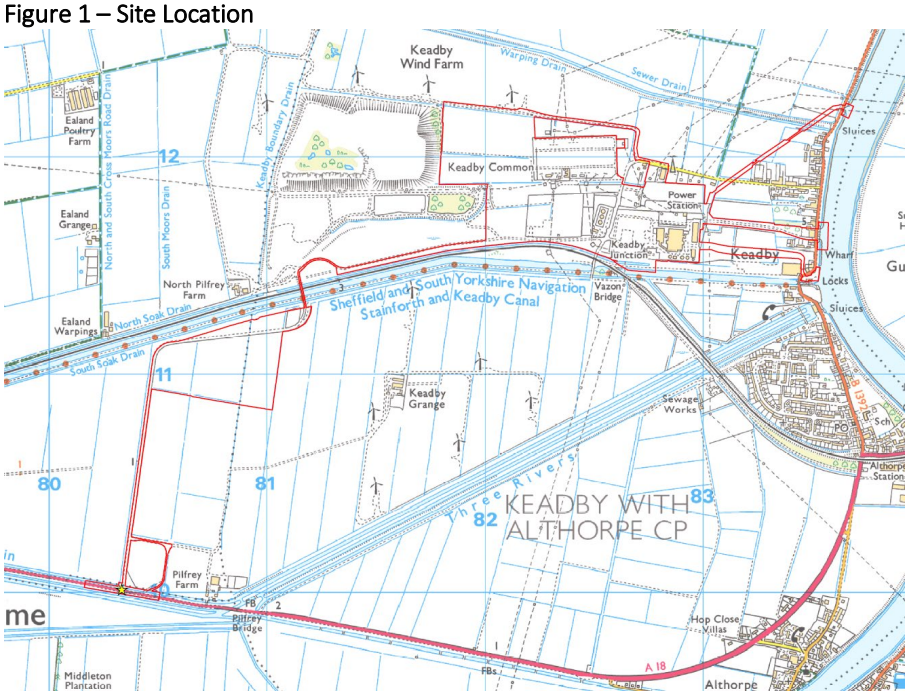
PREPARED FOR:	Simon Geoghegan (Highways England)
PREPARED BY:	Jonathan Parsons (CH2M)
DATE:	12th May 2021
PROJECT NUMBER:	679066.AA.21.05.06 DevHU0050
DOCUMENT REF:	TM001
REVIEWED / APPROVED BY:	Simon Snow (CH2M)

Task Overview

The purpose of this Technical Memorandum [TM] is to review the final draft versions of the Transport Assessment [TA], Construction Traffic Management Plan [CTMP] and Construction Workers Travel Plan [CWTP] submitted by AECOM on behalf of SSE Generation Limited in relation to a Low Carbon Combined Gas Turbine [CCGT] at Keadby 3 [the site]. The development proposals lie in the vicinity of the existing Keadby Power Station, Trentside, Scunthorpe.

The proposed site is located close to M180 Junction 2, which forms part of the Strategic Road Network [SRN], hence the requirement for Highways England to be consulted on the development proposals.

Figure 1 – Site Location



Source – Stage 2 Consultation

The draft documentation has been submitted to Highways England for review in advance of the Development Consent Order [DCO] application being submitted to the Planning Inspectorate.

This TM summarises the emergence of the planning application to date, detailing the transport parameters discussed and agreed at scoping, through to the current position. Furthermore, the TA, CTMP and CWTP are reviewed within this TM, with a summary and conclusions provided at the end of this document.

Application History

In August 2020, CH2M reviewed the TA Scoping prepared by AECOM (CH2M document reference AA.20.13.05 DevHU0050 TM001) which drew the following conclusions:

1) It is considered that AECOM will need to consider the AIL routing implications for M180 Junction 2 within the documentation prepared as part of the DCO application to enable Highways England to take a view on the implications at the SRN;
2) For clarity, CH2M request for the timings of deliveries throughout the week and the shift patterns that the permanent staff are likely to be working on to ensure that a robust assessment of the operational element of the proposed development can be undertaken;
3) This distribution and route assignment appear to be an appropriate distribution given the location of the development and the surrounding area, however, for clarity, CH2M request this information to be provided in Excel format within the DCO application for verification;
4) No reference is made to the use of count data on the SRN, which leads CH2M to the conclusion that the SRN will not be assessed as within the DCO application. As such, justification will be required from AECOM as to why this is the case;
5) The transport documentation prepared as part of the DCO application should be compliant with DfT Circular 02/2013; and
6) It is considered by CH2M that AECOM should liaise with the local authority on such matters and providing a list of committed developments is agreed with them, then CH2M would support this.

Subsequently, AECOM supplied further correspondence regarding CH2M's comments, with CH2M providing further information in an email, dated 16th September 2020. For completeness, these comments are replicated below:

- Abnormal Loads - *AECOM advise that they will give detailed consideration to this during the detailed design stage and that this will likely be secured via a requirement of the DCO. Highways England Abnormal Loads Officers will be consulted. This is considered an appropriate approach and something that Highways England will need to ensure is secured during the DCO process.*
- Operational stage impacts - *It is identified that the information requested by Highways England will be provided by the applicant. This will need to be ensured by Highways England as further work is undertaken.*
- Construction stage – distribution and assignment - *The Excel spreadsheet that was requested to verify the distribution and assignment has now been provided and this supports the initial view that had been reached with regards the distribution being reasonable.*
- Assessment of the SRN - *AECOM has identified that due to the level of construction traffic, as compared to base SRN data from the Webtris database, the temporary impacts are low (circa 1.3% of total traffic) and that assessment of the SRN is considered unnecessary. While …*
    - *this daily view is welcome;*

- *AECOM point towards measures proposed including the preparation of a Construction Worker Travel Plan and Construction Traffic Management Plan to manage down the traffic impact of the proposals; and*
- *Information is provided from Google traffic to identify the typical traffic conditions at Junction 2.*

… information should also be afforded in relation to the impacts of the construction stage during the peak periods to ensure that appropriate consideration has been given to the (albeit temporary) impacts in these peak periods. Such information will allow Highways England to confirm the intended approach and to assist in steering specific requirements of the Construction Worker Travel Plan and Construction Traffic Management Plan.

- Compliance with DfT Circular 02/2013 - *AECOM recognise that the assessment needs to be compliant in this regard.*
- Committed developments - *AECOM recognise the need to liaise with the Local Planning Authority in relation to the committed developments that need considering in the assessment.*

Subsequently in December 2020, CH2M reviewed the TA prepared by AECOM (CH2M document reference AA.20.20.06 DevHU0050 TM001) which drew the following conclusions:

1) With regards to operational traffic, the TA concludes that is considered that the effects of operational traffic would be negligible and as such, a detailed assessment of the operational phase of the development is not proposed within the TA. CH2M do not agree with this approach;
2) It is stated that a Framework CTMP will be prepared to accompany the DCO Application and the preparation of a CTMP, in accordance with that Framework, would be a requirement of the draft DCO. It is considered by CH2M that this approach is the most approach to managing construction movements and recommends that Highways England reviews the CTMP in due course to ensure it is an appropriate document;
3) The TA lists the committed developments that would need to be incorporated into the future baseline and future year assessment. It is considered by CH2M that North Lincolnshire Council is best placed to advise on the suitability of the sites provided for inclusion for assessment purposes;
4) It is noted by CH2M that no SRN links have been used to derive the peak hours on the SRN within the study area;
5) It is not clear why other junctions aside from the site access within the study area have not been modelled, or at least numbers presented to demonstrate why they do not have to be modelled for assessment purposes. It is noted by CH2M that during the scoping discussions that the impact at the SRN is considered to be low, but it is considered by CH2M that this information needs to be provided for completeness, and transparency. As such, CH2M are not able to ascertain the impact of the development proposals at the SRN;
6) It is stated that a Framework Construction Worker Travel Plan will be prepared as part of the DCO Application; and the appointed contractor will be required to prepare the final CWTP in accordance with this Framework CWTP. This approach is welcomed by CH2M; and
7) It is considered by CH2M that the SRN should be included within the CTMP given that it is stated that M180 Junction 2 is to be used within the routing of construction vehicles.

Following CH2M's review, further information was provided by AECOM through email correspondence and a meeting on Tuesday 19th December 2021 between CH2M, AECOM and Highways England, the outcome of which agreed the outstanding transport parameters within the TA, and Highways England

agreeing that the TA. CTMP and CWTP should be shared with Highways England in advance of DCO submission.

Transport Assessment Review

From the discussions at scoping, the outstanding issue to be agreed is Point 5 as detailed above.

AECOM's response was as set out in the TA Scoping Report, no junction modelling is proposed at any SRN junctions within the study area.

It was stated by AECOM that link flows for the M180 to the east and west of M180 Junction 2 have been extracted from Webtris to establish the peak hour on the SRN; and shows the peak hours to be 07:00 – 08:00 and 16:00 – 17:00.

Furthermore, it was established by AECOM that the impact of construction traffic on the M180 during the peak hours was very low with a maximum increase of 3.6% predicted on the M180 to the west of Junction 2 during the morning peak hour. Based on the temporary nature of the construction traffic effects (e.g. peak construction traffic only occurs for two months of the 36-month build programme) it was considered that no further assessment of the SRN is necessary.

In addition, AECOM stated that a full profile of construction traffic across the construction period will be provided in the final TA to accompany the DCO application.

It was agreed by CH2M to revisit this issue when the final TA / DCO application is submitted, as that will allow Highways England to take a definitive view on the impact of the construction phase at the SRN. As such, it is not considered that the draft TA needs to be reviewed in full as the parameters have already been agreed through the scoping process, aside from the above issue regarding construction traffic, however, the TA will be checked for consistency with the documentation seen to date.

Construction Generation

With regards to the construction generation in the TA, it is stated that the profile of construction workforce over the construction period has been developed based on the indicative construction programme and through discussion with the applicant.

The TA states that the estimated profile of workforce over the construction period for the development proposals is shown in Table 14 and has been benchmarked against both the Keadby 2 Power Station CCGT Plant (currently under construction) and the proposed Net Zero Teesside CCGT and CCP Plant.

It is considered by CH2M that basing the construction profile on existing sites is a robust approach.

Furthermore, it is stated that the first six months of the construction programme would be associated with early preparation works phase including the A18 junction improvement works and the Mabey Bridge replacement works. The main construction build would take place over a period of 36 months between months 7 and 42; and this shows that the peak construction workforce is forecast to occur between months 26 and 27 when circa 1,300 workers are expected on-site (c. 800 workers associated with CCGT construction and c. 500 workers associated with the Carbon Capture and Compression Plant construction).

It is noted by CH2M that the profile presented in Table 14 is different to that proposed during scoping, with a peak of 1,300 daily workforce in months 26 and 27 as opposed to months 20 and 21 in the profile shared during scoping. However, it is not considered by CH2M that this is an issue of concern for Highways England, and just reflects the development of the construction profile through liaison with existing sites and the applicant.

With regards to the construction workforce, it is noted that the assumptions regarding car and minibus occupancy remain the same as at scoping, and the daily vehicle profile during peak month of construction also remains the same

Operational Period

It is stated that during the operational phase of the development proposals, up to c. 50 full-time permanent operational roles would be created. It is anticipated that staff would work a similar shift pattern to existing Keadby Power Station staff, likely working a two-shift system 07:00 – 19:00 and 19:00 – 07:00. Furthermore, administrative staff are anticipated to work an office-hour pattern between 08:30 and 18:00. It is noted by CH2M that this was previously 09:00 to 17:00, but this is not considered to be an issue for Highways England as the operational traffic flows are not considered to have a severe impact at the SRN.

Aside from the sections mentioned above, the remainder of the TA – where issues are of interest to Highways England – remains unchanged, and as such, has been checked for consistency with previous documentation and discussions held.

Construction Traffic Management Plan Review

Measures to Control HGV Routing and Impact

It is stated that it is proposed that HGVs associated with the construction of the development proposals would be required to access / depart the site from M180 Junction 2 via the A161 and the A18. At the junction of the M180, it is assumed that 80% would arrive / depart to the west and 20% arrive / depart to the east. This is considered by CH2M to reflect the distribution within the TA and is therefore considered agreed.

In addition, it is stated that the contractor must distribute the HGV routing plan to all HGV drivers during their induction; and it will be a condition of contract between the applicant and the appointed contractor to aim to ensure that all construction HGV deliveries must use the designated route to access and egress the construction site. Sanctions will be put in place to deal with non-compliance. Furthermore, it is stated in the CTMP that it is noted that signage is currently in place at locations agreed with North Lincolnshire Council for the construction of Keadby 2 Power Station, which aims to facilitate appropriate routing of construction traffic, including avoiding Keadby village.

In addition, it is stated that the contractor will erect signage at the main junctions to appropriately direct all HGV traffic relating to the site (both accessing and egressing the site) towards the M180; and these will be in place for the duration of the construction phase and will be checked regularly to confirm they are visible throughout. It is also stated that the appointed contractor will be required to maintain all the HGV route signage. In overall terms, the approach to signing and routing is accepted by CH2M.

Construction Programme / Site Hours

It is stated that in order to minimise the disruption to the public, HGV deliveries will be restricted to the following core construction hours unless agreed otherwise with North Lincolnshire Council [NLC]:

- Monday – Friday: 07:00 – 19:00 (excluding Bank Holidays); and
- Saturday: 08:00 – 13:00.

It is proposed that HGV deliveries will be made during these core working hours, unless agreed in exceptional circumstances (e.g. during concrete pouring) in advance with NLC. The only expected HGV deliveries outside these hours may be the delivery of certain Abnormal Indivisible Loads [AILs], if required; and any noisy works outside the core working hours, including timing of AIL deliveries, if required, would be agreed with NLC on a case by case basis.

This approach is accepted by CH2M, although it is noted that where applicable, liaison with Highways England should take place regarding AILs.

Dealing with Non-Compliance

The CTMP states that to provide compliance with the measures set out above, the contractor must enforce a disciplinary procedure, “yellow/ red card system” or equivalent. In the first event of non-compliance, a warning will be issued to the HGV driver (yellow card). In the event of any repeat of the contravention, that driver will be prohibited from making further HGV deliveries to the site (red card).

However, it is not stated in the CTMP as to how the above system will be reported and / or monitored.

Wheel Cleaning Facility

It is stated that in the interests of highway safety, wheel cleaning facilities will be installed at the site from the start of the construction phase; and all HGV would be required to wheel wash prior to exiting the site. Furthermore, it is stated that the need for this measure will be periodically reviewed throughout the construction phase.

Although the site is not adjacent to the SRN, this measure is welcomed by CH2M.

Contact with Local Residents

The CTMP states that a 24-hour contact name and number will be displayed on a notice board at the site entrance and on the applicant's website, for members of the public to contact should they have any issues regarding construction traffic. Furthermore, the contact number could also be displayed on the Keadby with Althorpe Parish Council website if they wish to host this.

In addition, it is stated that residents will be updated on the construction of the development proposals via a regular update bulletin posted on the applicant's website; and this will include information on the timing and routing of AIL deliveries and a 24-hour contact name and number established by the contractor for members of the public to contact should they have any issues regarding construction traffic. As part of this approach it is stated that it is anticipated that the project liaison manager will act as the initial point of contact for members of the community to find out further information; and a link to this information could also be provided on the Keadby with Althorpe Parish Council website if they wish to host this.

It is considered by CH2M that this approach is appropriate.

Abnormal Indivisible Loads

Strategy and Routings

It is stated that a number of AIL movements are expected during the construction programme associated with the delivery of large items of plant and equipment; although the exact number and size / weight is not known at this stage and is based on specific construction methodologies that will be confirmed during detailed design. However, it is expected by AECOM that the proposed construction methodology will favour modularisation with pre-assembly off-site supplemented by on-site construction.

Furthermore, it is anticipated in the CTMP that delivery of AIL to the site will use the same routes as those currently being used for the delivery of AIL associated with the construction of Keadby 2 Power Station. This is considered to be an appropriate approach by CH2M.

The CTMP states that it is expected that the largest abnormal loads will be received at the Port of Immingham and barged down the River Trent to the Waterborne Transport Offloading Area at Railway Wharf. The components will then be transported to the site crossing the B1392 onto the temporary haul road that runs to the east of PD Port Services. Traffic management in the form of Stop / Go signs will be used to halt traffic along the B1392 in order to allow the abnormal loads to cross the B1392. Given that this approach would reduce the number of movements on the SRN, this approach is supported by CH2M.

It is stated that in order to provide an indicative estimated number of AIL movements to the Waterborne Transport Offloading Area, data from the construction of Keadby 2 Power Station has been reviewed. It is anticipated by AECOM that the development proposals will require a similar number of AIL shipments for the CCGT unit and an additional number of units for the CCP.

As such, it is stated that over the course of c. seven months in 2020, 25 AIL shipments arrived at Railway Wharf for Keadby 2 Power Station; although it is noted that a further c. 10 - 15 AIL shipments may be associated with the CCP unit.

On this basis, it is estimated by AECOM that around 35 – 40 AIL movements could be required at Railway Wharf; and these movements would take place over the period allocated for erection of main process equipment.

Furthermore, it is stated that smaller abnormal loads are expected to be transported by road from Immingham Dock via the M180 to M180 Junction 2 and then from the A161 to the A18, entering the

site via either the perpendicular construction access or, if required, the skewed construction access off the A18 (Work No. 8A) and then over the privately owned and maintained North Pilfrey Bridge.

The CTMP states that detail of the routing strategy and procedures for the notification and conveyance of AIL, including agreed routes, the number of abnormal loads to be delivered by road, construction programme, and measures for the temporary protection of carriageway surfaces, the protection of statutory undertakers' plant and equipment, and any temporary removal of street furniture will be set out in the final Construction Traffic Management Plan, which is secured as a requirement of the draft DCO. This approach is accepted by CH2M.

As part of the approach to managing AILs, it is stated that both NLC and Highways England's abnormal loads officer will be consulted at the earliest opportunity on the programme and plan for the delivery of the AIL, as part of, or in advance of discharging the relevant DCO requirement. This is welcomed by CH2M.

Monitoring

General Measures

It is stated that a programme of monitoring will be adopted to assess the effectiveness of the measures included in the final CTMP to control the routing and impact of construction HGV; and it will provide a firm basis upon which to answer queries and complaints regarding the HGV traffic impacts during construction. A 24-hour contact name and number will be established by the contractor and displayed at the site.

HGV Monitoring Surveys

The CTMP states that the appointed contractor will maintain gatehouse records of construction HGV entering and leaving the site, which will be made available to NLC on request.

Furthermore, it is stated that should any complaints be raised by members of the public with regards to construction HGV not using the dedicated HGV route to the site, gatehouse records along with CCTV footage obtained from the gatehouse would be used to identify the offending HGV involved and appropriate sanctions put in place with the aim of avoiding repeat events.

Consultation

Planned Liaison

It is stated that as is currently undertaken for the construction of Keadby 2 Power Station, a formal process of liaison between all relevant parties (Principal Contractor, NLC and Highways England) via a Local Liaison Committee, would:

- Make all parties aware of the results of monitoring of the final CTMP;
- Provide a route by which any complaints can be communicated and dealt with; and
- Provide a route through which transport related issues can be identified and dealt with.

The CTMP states that the Local Liaison Committee will be secured via a requirement of the draft DCO. Furthermore, it is proposed that a short written report is prepared by the contractor on a six monthly basis and circulated to all key stakeholders; and any comments generated by the report will be circulated to all key stakeholders and a meeting may be held if required.

It is considered by CH2M that the approach to monitoring and consultation, and the continued involvement of Highways England through the Local Liaison Committee is appropriate.

Construction Workers Travel Plan Review

Proposed Development

Accessibility

It is stated that the accessibility of the site has been reviewed with respect to opportunities for walking, cycling and the availability of public transport. It is considered by CH2M that due to the nature of the development proposals, the site is not likely to be in a sustainable location, notwithstanding, the review of the site's sustainable credentials is welcomed.

Walking

The CWTP states that the Institute of Highways and Transportation (IHT) document, '*Planning for Journeys on Foot*' (Institute of Highways and Transportation, 2000) suggests that the preferred maximum is up to 2km for commuting. It is stated that considering a c. 2km walking catchment to the site entrance off the A18, the potential for walking is limited. The local villages of Keadby and Althorpe lie >2km away and so would not be within walking distance of the site.

Cycling

The CWTP states that cycling provides a good alternative to the private car in that it is cheap, offers reliable journey times, is environmentally friendly and promotes improved health through regular exercise. The IHT states that the average length of a cycle journey is 5km. A 5km catchment area includes the villages of Keadby, Gunness and Althorpe. Given this catchment area, the potential for cycling to the site is considered to be limited.

It is stated that whilst there is no specific cycling infrastructure in the vicinity of the Keadby Power Station Site, either on or off-road, it is considered that the site is reasonably accessible for those within the 5km catchment wishing to cycle.

Public Transport

The CWTP states that the IHT document, 'Guidelines for Public Transport in Development' 1999 (IHT, 1999) recommends a maximum walking distance of 400m to a bus stop. It is stated that there is a bus stop located on the B1392 Trentside to the south of the Stainforth and Keadby Canal located approximately 1.5km from the main construction site entrance off the A18. This bus stop is served by one bus service (Service 35) which routes between Amcotts and Scunthorpe. However, the service is infrequent with only 4 services per day Monday to Friday and 3 services per day on a Saturday and is not considered by AECOM to be generally compatible with construction workers arriving and leaving the site. As such, it is concluded that public transport is likely to be an unattractive option for construction workers.

Train Services

The nearest train station to the Site is Althorpe (c. 4.2km to the north-east of the site access) providing an hourly service to Scunthorpe and a two-hourly service to Doncaster. The IHT document, 'Guidelines for Planning for Public Transport in Developments' (IHT, 1999), recommends a maximum walking distance of 800m to a major fixed pubic transport mode, therefore, it is considered unlikely by AECOM that there would be a large demand by construction workers for journeys of this type.

Construction Phase Site Worker Traffic Generation

It is stated that the construction workforce is forecast to peak at c. 1,300 workers per day in months 26 – 27. It is noted by CH2M that this is consistent with the information provided within the TA.

Furthermore, it is stated that the core construction working hours for the development proposals would be 07:00 to 19:00 Monday to Friday (except bank holidays) and 08:00 to 13:00 on Saturdays. Key exceptions to these core working hours could include activities that must continue beyond these

hours (e.g. during concrete pouring) which would be agreed in advance with the local authority and non-noisy activities that may be undertaken at night. Again, it is noted by CH2M that this is consistent with the information provided within the TA.

In relation to traffic generation associated with construction workers, it is stated that for robustness, the peak construction month has been considered (i.e. months 26 – 27); and the assumption has been made that 80% of workers would travel to site by private car, with an average occupancy of two workers per vehicle, and 20% would travel to site by minibus with an average occupancy of seven workers per vehicle. It is noted by CH2M that this is consistent with the information provided within the TA.

It is stated that this is to account for the fact that some of the general and specialist workers would work in groups and arrive / depart together. In addition, the assumptions set out and resulting expected traffic volumes are a worst-case and make no allowance for the potential reductions in travel by private car as a result of implementation of the final CWTP. This is noted by CH2M but with due cognisance paid to the lack of accessibility of the site stated earlier within the CWTP.

Car Parking Provision

It is stated that parking demand would vary throughout the construction phase and parking area would be set aside within the site to accommodate parking for construction workers; and it is anticipated that this may be within laydown areas south of North Pilfrey Bridge, adjacent to the access road. Furthermore, if chosen, a park and ride system would then transport the construction workers between the compound and the proposed PCC site.

It is considered by CH2M that parking provision is not an issue that should concern Highways England as any displaced parking issues would not cause operational issues at the SRN.

Objectives

It is stated that the CWTP, to be secured as a requirement of the draft DCO, would act in helping the environment by reducing the number of trips made to and from the site by private car during the construction phase; and all construction staff would be made aware of the measures included in that Travel Plan, so that benefits can be delivered, and the number of car borne trips reduced; promoting car sharing and minibus use.

Furthermore, it is stated that the CWTP would aim to provide all construction staff with an awareness of the advantages and potential for travel by more sustainable and environmentally friendly modes of transport, through raising awareness and the provision of information identifying travel options and the necessary contact information.

The primary objectives which are of most relevance during the construction period of the development proposals are to:

- Facilitate an appropriate package of measures to encourage sustainable travel behaviour;
- Reduce car usage (particularly single occupancy car journeys);
- Raise awareness of the sustainable transport measures serving the site; and
- Minimise the impact of traffic on sensitive locations.

It is considered by CH2M that the objectives of the CWTP are appropriate.

Roles and Responsibilities

The Applicant

It is stated that the applicant would be responsible for ensuring a condition of contract between them and the contractor to develop and comply with the provisions of a CWTP.

The Travel Plan Co-ordinator

The CWTP states that the Travel Plan Co-ordinator [TPC] has a key role to play in managing, monitoring and implementing the individual measures within the Plan; and the importance now placed on the CWTP process means that the TPC role is becoming increasingly important. It is stated that the TPC would be appointed by the contractor to manage and deliver the CWTP; and their details would be supplied to NLC and Highways England.

It is stated that the TPC would work closely with the Site Manager, who has overall responsibility for the site during construction, and thus has the authority to introduce measures for those workers who do not follow the guidelines.

The responsibilities of the TPC are stated to include:

- Encouraging the contractual obligations of contractors / sub-contractors related to the CWTP to be adhered to;
- Ensuring the CWTP notice board is located in a prominent position and that the information is kept up to date;
- Being based on site;
- Acting as the key point of contact for issues related to construction traffic;
- Undertaking a snapshot parking survey on one day per month to verify that car park occupancy targets are being met;
- Reviewing cycle parking provision on a regular basis;
- Engaging with local stakeholders;
- Monitoring performance against the targets of the CWTP; and
- Implementing additional measures if not delivering on targets set.

It is considered by CH2M that the roles and responsibilities of the TPC are appropriate.

The Contractor

It is stated that the contractor will be responsible for managing how their workers travel to and from the site in order to control the demand for car parking spaces. The contractor's responsibilities will primarily include:

- Providing a TPC to oversee the management and delivery of the CWTP;
- Encouraging and promoting the use of sustainable transport measures included within the CWTP; and
- Organising crew minibuses to transport workers to and from the site, where appropriate.

It is considered by CH2M that the roles and responsibilities of the contractor are appropriate.

Travel Plan Measures

General

It is stated that to encourage sustainable travel behaviour by construction staff throughout the period of construction, it is important that an appropriate package of measures is introduced; and the package of measures would aim to minimise the level of construction worker traffic, and wherever possible, minimise the impact and disruption of the remaining traffic on the local road network.

Proposed Measures to Reduce the Level of Traffic

Car Parking

It is stated by AECOM that the availability of car parking has a major influence on the means of transport people choose for their journeys, and is, therefore, an important Travel Plan measure in promoting sustainable travel to and from the site.

As such, it is proposed that sections of the car park would gradually be opened up as construction develops, with a defined number of construction worker car parking spaces to be provided during construction. Managing the number of parking spaces available on-site would help to control the number of vehicles and promote sustainable transport options. Furthermore, it is stated that it would be the responsibility of the TPC working closely with the Site Manager, to determine the amount of spaces to be provided.

It is stated that car parking at the site would be monitored by the TPC, with restricted access. The Site Manager and the TPC would set the appropriate criteria for construction workers to receive a pre-allocated parking space.

It is considered by CH2M that the approach taken to managing car parking is appropriate, although as stated previously, it is not considered that displaced parking at the site would be an issue for Highways England.

Minibus

The CWTP states that contractors would be encouraged to provide minibuses for transporting their workers from the key points of construction worker origin to the site; and this would have the benefit of reducing the number of vehicular trips on the local road network. It is stated that for example, many construction workers would find local accommodation at hotels and bed and breakfasts [B&B]; and as such, they would be keen to minimise their daily travel costs and a minibus service would be an attractive means of transport to them. Furthermore, it is stated that the location of accommodation chosen by these workers could provide suitable pick up locations for the minibus; and minibus routes could also be set up to collect workers that live locally from central pick up points.

It is also stated that the contractor would encourage the use of common hotels and B&B by workers that are not from the local area, to encourage the use of shared transport modes such as minibuses. In addition, it is stated that the contractor would be requested to provide minibuses and to organise where the minibuses would pick up workers and at what times.

It is considered by CH2M that the stated approach to minibus travel is appropriate.

Car Sharing

The CWTP states that the contractor would be encouraged to set up and manage a car share scheme for their workers. In emergencies, it is stated that the TPC would provide a guaranteed lift home for car sharers e.g. by use of taxi; and the provision could be extended for emergency situations for staff that cycle to the site.

Cycling

It is stated that although cycling to the Site is likely to have limited appeal (due to carrying personal protective equipment (PPE) etc. and the distance to the site from larger conurbations) secure parking for bicycles will be provided. Furthermore, it is stated that construction staff that cycle to work would also have access to shower and changing facilities and lockers to store clothing, cycle helmets etc.

On-site storage

The CWTP states that an on-site storage facility is usually provided by contractors; and this facility would encourage construction workers to store their tools / PPE on-site. It is considered by AECOM

that this would reduce the number of tools they would need to carry each day and would assist those workers who are considering cycling or car sharing as a potential travel mode.

Minimising the Impact on the Local Road Network

Staggered Working Hours

The CWTP states that working hours on major construction sites tend to be long, due to pressures of timescales and available light. Therefore, AECOM states that the arrival and departure of workers' vehicles tend to be spread over the peak periods, rather than all falling in the traditional peak hours, thereby minimising the impact on any particular time period.

Travel Plan Communication

The CWTP states that details of the sustainable transport options available for accessing the site would be provided in an information pack and sent to construction workers, prior to them starting work at the site. It is stated that this will raise awareness of the initiatives being implemented and also allow staff to register an interest in the schemes; and the contractor will be responsible for ensuring all construction workers receive the information pack prior to starting work on site.

Furthermore, it is stated that all construction workers will receive an introductory meeting on the travel plan when they commence work, incorporated into the site safety briefing, and it will include the provision of the following information:

- Designated access and exit routes to the site;
- Details of sustainable transport measures available for accessing the site; and
- Parking arrangements.

It is envisaged by AECOM that this would provide each construction worker with a full awareness of the travel plan and measures contained within it.

In overall terms, it is considered by CH2M that the measures contained within the CWTP are appropriate.

Targets

It is stated that without management, construction industry standards suggest a typical vehicle occupancy of 1.35 which would result in 963 vehicles arriving and departing the site per day at the peak of construction. It is noted by CH2M that this is inconsistent with the numbers presented in Table 15, which assumes a car / van occupancy of two people, alongside 38 minibuses each containing seven people, resulting in an average two-way daily flow of 1,116 vehicles.

Notwithstanding, this inconsistency, it is stated that one of the prime objectives of an active CWTP is to set clear and realistic targets; and the main target to be achieved during the construction of the development proposals is as follows:

- To achieve a car occupancy of 2.33 workers per vehicle over the duration of the construction project. Up until handover of the development proposals, no more than one car or van should be parked on-site for every two people registered on-site per day.

It is stated that the TPC will monitor parking utilisation at the site, reviewing the split between cars, vans and minibuses; and ensuring that this target is met is dependent on the contractor encouraging workers to travel to and from the site by sustainable options provided in the final CWTP. Furthermore, it is stated if the monitoring finds that the target is not being met, this will result in the implementation of additional measures to help to facilitate the CWTP staying on course to meet its overall objectives.

In addition, it is stated that the above target represents a 42% reduction in vehicles arriving at the site when compared to the industry standard.

It is considered by CH2M that any measures to reduce the number of single occupancy private vehicle trips to and from the site should be welcomed by Highways England, alongside monitoring of this to inform the achievement against the stated target.

Monitoring and Review

General Measures

It is stated that monitoring the CWTP will be central to ensuring its aims are delivered in practice; and that monitoring helps identify failures or changing conditions at the earliest point and therefore that remedial action (i.e. identifying additional measures, providing incentives, marketing campaign to promote the CWTP) can be taken, to facilitate that the travel plan stays on course to meet its objectives.

To this end, it is stated that the TPC would be responsible for monitoring delivery of the travel plan, to oversee the efficient and effective execution of the measures and to refine the measures, where necessary, to cope with the changes in demand over the construction phase.

AECOM state that an important part of the monitoring strategy would be obtaining feedback from construction workers, Highways England, NLC and local residents regarding any issues with construction worker traffic; and that the appointment of a TPC will provide an appropriate point of contact is available and can react to such feedback. In addition, it is stated that employees would be given the chance to offer their suggestions and ideas via a suggestion box / an informal discussion with the TPC; while review meetings would be held at regular intervals to facilitate effective management of any issues that may arise.

This approach is supported by CH2M, as it enables Highways England to provide feedback as the construction at the site emerges.

Parking

With regards to parking, it is stated that the TPC will monitor the total number of construction workers on-site and the number of parking spaces provided to help achieve the proposed car occupancy targets; and that it is anticipated that monitoring would be undertaken on one day per month throughout construction.

This approach is considered acceptable by CH2M.

Summary and Conclusions

The purpose of this Technical Memorandum is to review the final draft versions of the Transport Assessment, Construction Traffic Management Plan and Construction Workers Travel Plan submitted by AECOM on behalf of SSE Generation Limited in relation to a Low Carbon Combined Gas Turbine at Keadby 3. The development proposals lie in the vicinity of the existing Keadby Power Station, Trentside, Scunthorpe.

The proposed site is located close to M180 Junction 2, which forms part of the Strategic Road Network, hence the requirement for Highways England to be consulted on the development proposals.

The draft documentation has been submitted to Highways England for review in advance of the Development Consent Order application being submitted to the Planning Inspectorate.

This TM summarises the emergence of the planning application to date, detailing the transport parameters discussed and agreed at scoping, through to the current position. Having reviewed the final draft versions of the TA, CTMP and CWTP, no issues or areas of concern have been identified. As such, it is considered by CH2M that they can be submitted as part of the DCO application, with Highways England recommended to offer no objection to the DCO application when it is submitted,

so long as the documents reviewed here are submitted in support of the application without modification.