



**Canal &
River Trust**

Making life better by water

keadby3@planninginspectorate.gov.uk

Your Ref EN010114

Our Ref IPP-117

Tuesday 01 February 2022

Dear Mr Christopher Butler

Proposal: Application by Keadby Generation Limited for an Order Granting Development Consent for the Keadby 3 Low Carbon Gas Power Station Project.

Response to Questions Raised by the Examining Authority for Deadline Two (Unique Reference : KDB3-SP090)

Question Q1.2.7 – Dust Mitigation Measures

Having reviewed the Framework Construction and Environmental Management Plan, the Trust is generally satisfied that the dust mitigation proposals are sufficient. Having reviewed the contents of the report, we do wish to make two observations below:

Page 19, Table 2 – Air Quality

Having reviewed table 2 in depth, the Trust is generally satisfied with the general mitigation and monitoring measures identified. Consideration could, however, be given for the covering or seeding of soil heaps. Unless there is a reason as to why this has not been considered (in which case it would be helpful for this reason to be referenced), soil heaps could be a considerable source of dust, especially in dry weather. Covering or seeding of the heaps could provide a sustainable solution to help limit any dust exposure from these to the wider environment.

Final CEMP

A significant proportion of detail with regards to dust mitigation is reserved for the final CEMP document, including details of responsibilities and monitoring.

Depending entirely on what the referenced investigations find, the Trust would expect the final CEMP to include specific area focussed controls to manage any contamination found that could also be mobilised, including dust. This would include the need for information upon the location, any treatment of contaminated particles and storage locations.

Question Q.16.13 – re. Article 8 (Application and Modification of Statutory Provisions)

The Trust has reviewed Article 8 and does not have any specific concerns with the wording from a legal or operational perspective.

Question Q1.16.18 – re. Article 14 (Discharge of Water)

We note that the proposed Supplemental Power does allow the undertaker to use any watercourse for the drainage of water, which could include the Stainforth & Keadby Canal, owned and managed by the Trust. Any new discharge to the

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canal would need to be carefully managed to ensure it did not result in a pollution risk, cause hard to navigation or result in complications to the water management of the canal.

Subject to the inclusion of sub paragraph (3), requiring the consent of the person to whom the watercourse belongs, the Trust is satisfied that Article 14 should not adversely impact upon the Trust's ability to assess proposed incoming water drainage from the scheme.

Question Q.1.16.21 – re. Article 17 (Temporary Interference with Canal and Public Rights of Navigation)

The Trust note that Article 17 would allow the undertaker to temporarily interfere with the canal to carry out their works, or to moor barges or other vessels at the canal. It also would allow for the closure of the canal, although under sub paragraph (2) only for the minimum time necessary and must keep obstruction, delay or interference to a minimum.

We advise that any operations in the Stainforth & Keadby Canal, or works that could impact the canal, need to be co-ordinated with the Trust appropriately, so as to ensure that those operations do not adversely impact upon the Trust's charitable objectives nor result in any adverse impact to the structure of the canal.

Subject to the following, the Trust is satisfied that Article 17 should not adversely impact upon the Trust's ability to manage the Stainforth & Keadby Canal:

1. The Trust recommends that changes are made to the protective provisions (Schedule 10, Part 2) of the DCO as set out in the Trust's written representation. The changes relate to the work areas identified, the cap on liability and compliance with the Trust's Code of Practice.
2. All other paragraphs within the protective provisions (Schedule 10, Part 2) remain the same.

Yours sincerely,

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