

Date: 1 February 2022  
Your Ref: EN010114  
Our Ref: 14592



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Dear Liam,

**KEADBY 3 CARBON CAPTURE POWER STATION PROJECT – APPLICATION BY KEADBY GENERATION LIMITED FOR AN ORDER GRANTING DEVELOPMENT CONSENT FOR THE KEADBY 3 CARBON CAPTURE POWER STATION – LAND AT THE KEADBY POWER STATION SITE, TRENTSIDE, KEADBY, SCUNTHORPE, LINCOLNSHIRE, DN17 3EF**

**THE PLANNING ACT 2008**

**THE INFRASTRUCTURE PLANNING (EXAMINATION PROCEDURE) RULES 2010, RULES 8 AND 17**

The Applicant writes in response to the 'Rule 8' letter dated 14 December 2021 [**PD-008**] in which the Examining Authority has requested comments on information submitted at Deadline 1, Comments on Local Impact Reports, responses to ExA's Written Questions [**PD-009**], the Applicant's draft itinerary and various updated documents, to be submitted by Deadline 2, and in response to the 'Rule 17' letter dated 17 January 2022 [**PD-010**] in which the Examining Authority requested further information and comments related to archaeology and the Applicant's request to adjust the project name. The Applicant also writes to provide updates on commitments made at Deadline 1.

**Response to Rule 8 Letter [PD-008]**

***Responses to the Examining Authority's Written Questions (ExQ1)***

The Applicant submits alongside this letter its response to the Examining Authority's Written Question [**PD-009**] in two volumes. The first volume contains the written answers (Document 9.2 – Applicant's Response to Examining Authority's First Written Questions – Vol 1) while the second volume contains supporting documents (Document 9.3 – Applicant's Response to Examining Authority's First Written Questions – Vol 2 (Appendices)).

***Comments on Local Impact Reports***

The Applicant submits alongside this letter its comments on North Lincolnshire Council's Local Impact Reports (Document Ref. 9.4).

***Comments on any information submitted for Deadline 1***

The Applicant notes the response by Canal and River Trust [**REP1-023**] and would advise the ExA that an updated SoCG with the Trust is being progressed. We have provided an account of the discussions

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held with regard to the land acquisition in our response to the ExQ1's which in relation to the Trust states:

*"In response, the Applicant considers that there has been extensive consultation and discussions with C&RT both prior and since receipt of document AS-001 and they have every intention of trying to reach agreement in default of which the grant and exercise of compulsory purchase powers would be both reasonable and proportionate."*

We do not have comments on information submitted by other parties at Deadline 1 save for those incorporated within the Applicant's response to the Examining Authority's Written Questions and its comments on the Local Impact Report.

### ***Updated Documents***

The Applicant submits alongside this letter a Statement of Commonality of SOCG (Document Ref 9.5), an update on the progress that has been made with Affected Persons in respect of Compulsory Acquisition and Temporary Possession (Document Ref. 9.6), an updated Draft DCO (Document Ref. 2.1 [Revision 2.0]), and a schedule of updates to the Draft DCO (Document Ref. 9.7). The Applicant is providing a tracked PDF and tracked Word version of the draft DCO. The Applicant is currently unable to provide a clean version of the draft DCO in the SI template due to illness within the Applicant's Project Team, but this will be provided as soon as possible.

There are no updates to make to the Book of Reference compared to Revision 2.0 submitted at Deadline 1. The Applicant will submit an updated Book of Reference if and when due diligence results in new information.

### ***Applicant's draft itinerary for the Accompanied Site Inspection***

The Applicant's draft itinerary for the Accompanied Site Inspection and explanatory text can be found at Appendix 1 of this Cover Letter.

### ***Any further information requested by the ExA***

The ExA requested further information via the Rule 17 letter dated 17 January 2022 [PD-010]. This is covered in detail below.

### **Response to Rule 17 Letter [PD-010]**

#### ***Archaeology***

The Applicant submits alongside this letter their responses to the questions included in the ExA's Rule 17 Letter (Document Ref. 9.8) which includes an indicative timetable for archaeological evaluation subject to access agreements and contractor appointment. The timetable is possible in principle but not yet final due to the abovementioned practical uncertainties.

#### ***Applicant's Request to adjust the project name***

The Applicant regards the change to the project name as non-material particularly given that it is consistent with other external messaging on the project underway. When considering whether to carry out consultations on changes regard must be had to whether prejudice is likely to occur in the absence of such consultation. We are not aware of any potential for prejudice to arise given that the change comprises modified wording between 'Keadby 3' and 'Power Station' thus not altering the core geographical and typological descriptors of the project, so it would not be perceived by any reasonable person as a different project.

A comprehensive voluntary round of consultation is being planned by the Applicant for a proposed Material Change Application (see further down this letter). This offers a logical opportunity for the Applicant to begin using the project name (which we have started using in documents submitted into examination). We would therefore be grateful if the new project name could be changed on the PINS website to coincide with the publication of our newspaper advertising later in February relating to this voluntary consultation and we would keep in touch with your officers to advise of the dates we obtain from newspapers.

### **Updates on matters in our Deadline 1 Cover Letter [REP1-001]**

#### ***Statements of Common Ground***

The Applicant committed to the submission of a number of Statements of Common Ground in its Deadline 1 Covering Letter [REP1-001]. The Applicant is able to provide the following updates:

- Environment Agency – the Applicant is still in discussions with the Environment Agency on a draft SOCG and intend to submit an agreed SoCG at Deadline 3.
- Severn Trent Water – the Applicant is still in discussions with Severn Trent Water regarding agreeing a draft SoCG. The Applicant has provided a draft SoCG to Severn Trent Water for comment and hopes to be able to submit at Deadline 3.
- UK Health Security Agency (formerly Public Health England) – the Applicant is able to submit an agreed draft alongside this letter (Document Ref. 8.13). This is an agreed draft and clarifications from UK Health Security Agency are to be issued to us around 11 February.
- Keadby with Althorpe Parish Council – the Applicant is able to submit an agreed SoCG alongside this letter (Document Ref. 8.14).
- Isle of Axholme and North Nottinghamshire Internal Drainage Board – the Applicant stated an intention to submit a voluntary SoCG with Isle of Axholme and North Nottinghamshire Internal Drainage Board at Deadline 2. The Applicant is still in discussions with the IDB and intends to submit this at Deadline 3.

### **Documents Submitted at Deadline 2**

The Applicant requests that the Examining Authority accepts the following documents submitted at Deadline 2:

- Document 1.2 – Application Guide [Revision 3.0];
- Document 2.1 – Draft Development Consent Order [Revision 2.0] (tracked PDF and tracked Word versions);
- Document 8.13 – Draft Statement of Common Ground with UK Health Security Agency;
- Document 8.14 – Statement of Common Ground with Keadby with Althorpe Parish Council;
- Document 9.2 – Applicant’s Response to Examining Authority’s First Written Questions – Vol 1;

- Document 9.3 – Applicant’s Response to Examining Authority’s First Written Questions – Vol 2 (Appendices);
- Document 9.4 – Applicant’s Comments on Local Impact Report;
- Document 9.5 – Statement of Commonality of Statements of Common Ground;
- Document 9.6 – Update on the progress that has been made with Affected Persons in respect of Compulsory Acquisition and Temporary Possession;
- Document 9.7 – Schedule of Updates to Draft Development Consent Order; and
- Document 9.8 – Rule 17 (Archaeology) Questions of 17 January 2022 (including Indicative Archaeological Evaluation Timetable).

### **Intended Material Change to the DCO Application – Step 1 Letter**

In parallel with this Deadline 2 submission the Applicant is submitting a letter to the Examining Authority outlining its intention to submit a Material Change Application (‘the MC Application’) to the Examining Authority. The letter is independent of the Deadline 2 submission, and represents step 1 in the process advised in Planning Inspectorate’s Advice Note 16 (‘AN16’), March 2018.

Should you have any questions with regard to the Application or this Deadline 2 submission package, please do not hesitate to contact Colin Turnbull at this office using the details provided.

Yours sincerely,



**DWD**

**For and on behalf of Keadby Generation Limited**

Appendices:

- Appendix 1: Applicant’s draft itinerary for the Accompanied Site Visit



**APPENDIX 1: APPLICANT'S DRAFT ITINERARY FOR THE ACCOMPANIED SITE VISIT**

## 1.0 INTRODUCTION

### 1.1 Overview

- 1.1.1 The Rule 8 letter (**PD-008** dated 14 December 2021) states that week commencing 11 April 2022 has been reserved for the Accompanied Site Inspection (ASI). Comments on suggested locations/ sites for the Examining Authority (ExA) to include as part of the ASI were submitted at Deadline 1 (21 December 2022) by the Applicant in their cover letter (**REP1-001**) and by the Canal and River Trust (**REP1-023**). No other Interested Parties submitted comments on suggested locations for the ASI at Deadline 1.

## 2.0 APPLICANT'S ACCOMPANIED SITE INSPECTION ITINERARY

### 2.1 Overview

- 2.1.1 The Applicant proposes that the itinerary for the ASI will focus primarily on the Proposed Development Site, the points of access, infrastructure connections and surrounding viewpoints. The Applicant will provide a minibus (or other appropriate means of transport) for the ASI, but some walking will also be required.
- 2.1.2 Notification of attendees is required to **thermalenquiries@sse.com** by Deadline 4 (1 March 2022) to enable the Applicant to ensure the availability of transport and site access.
- 2.1.3 The ASI can be completed over one day and provides adequate time to visit the Proposed Development Site in detail.

**Table 1: Applicant's Draft Itinerary for the Accompanied Site Inspection**

Time	Activity	Locations
9:30	Meet at Site Access Road off A18. Park in Layby (480397, 410244).	N/A
10:00	Introductory remarks from ExA and Safety Briefing.	N/A
10:15	Walk down access road to view Mabey Bridge and Hatfield Waste Drain on foot before returning to vehicles.	Mabey Bridge over Hatfield Waste Drain and A18 junction (480330, 410030)
10:45	By car, travel up the access road and cross over North Pilfrey Bridge. Turn right and park safely. Walk to North Pilfrey Bridge.	North Pilfrey Bridge (481150, 411410).
11:10	Walk west along Bonnyhale Road until reaching 480370, 411200 before returning to vehicles.	Bonnyhale Road (480370, 411200)
11:45	Option A - if archaeological works on Keadby Common are not taking place, transfer into 4x4 vehicles provided by the Applicant with COVID measures implemented in cars i.e., masks to be worn and windows open. These vehicles will take attendees onto Keadby Common  Option B – if archaeological works are taking place on Keadby	Ash Mound (481690, 412180)

<b>Time</b>	<b>Activity</b>	<b>Locations</b>
	Common – as per Option A, with vehicles proceeding up and over the Ash Tip to view the Proposed PCC Site from a vantage point on it's western extent before returning to vehicles.	
12:30	In own vehicles drive east along Ealand Road, safely parking just before the junction at 482360, 411610.	Ealand Road (482360, 411610)
12:40	Walk east along Ealand Road and turn right at the junction. Continue walking south over the watercourse and railway track until reaching Viewpoint 2.	Viewpoint 2: Gate Keepers Residence, Vazon Bridge (482490, 411510)
13:00	Walk back north over the railway track and watercourse and take the next right. Walk east until reaching the Keadby 2 Power Station Canal Water Abstraction Intake before returning to own vehicles.	Keadby 2 canal water abstraction intake (48275, 411509)
13:25	In own vehicles drive east along Ealand Road, crossing the junction before turning left onto West Road and right onto North Road, travelling through the Keadby Power Station Site and along Trent Road before parking in the main Keadby Power Station Car Park on Trent Road (483118, 411671).	N/A
13:30	Lunch – visitors to have lunch in own vehicles.	N/A
14:00	Transfer into vehicles provided by the Applicant with COVID measures implemented in cars i.e. masks to be worn and windows open.	N/A
14:05	Vehicles will take attendees along Trent Road to Railway Wharf (Waterborne Transport Offloading Area).	Railway Wharf (483466, 411451)



Time	Activity	Locations
14:10	Walk north up Trent Side (B1392). Taking in views of River Water Abstraction Option ( <b>Work No. 4B</b> ), Cooling Water Discharge Pipeline ( <b>Work No. 5</b> ) and Temporary Haulage Route ( <b>Work No. 10A</b> ).	Locations along Trent Side, B1392 (483510, 411620 to 483640, 412220)
14:20	Attendees will be picked up at 483668, 412280.	N/A
14:30	Attendees will be taken to Viewpoint 4.	Viewpoint 4: Public Right of Way (KEAD9 and KEAD10), North of Keadby (483220, 412380)
14:40	Attendees will be taken to Viewpoint 1.	Viewpoint 1: Chapel Lane West, Keadby (483210, 411880)
14:50	Attendees will be returned to their own cars.	N/A
15:00	Complete Accompanied Site Visit. Alternatively, the ASI can continue and take in some longer distance views outlined below.	N/A
If continuing	In own cars, travel east along Trent Road, turn right and travel south along Trent Side (B1392) and A18 before turning left and parking safely on Kelsey Lane, crossing the road to Viewpoint 6.	Viewpoint 6 Trunk Road, Keadby (483210, 409770)
15:20	Turn left back onto the A18 and drive south, following the road before turning right onto the A161. Drive north along the A161 until reaching the mini roundabout. At the mini roundabout take the second exit onto Fieldside and travel north along Fieldside before turning right onto Field Road. Travel east along Field Road before parking outside an existing electrical substation.  By foot, travel along the remainder of Field Road until reaching PRow CROW 14 before returning to own cars.	PRow (CROW 14) south of Eastoft Road, Crowle (478393, 412754)

<b>Time</b>	<b>Activity</b>	<b>Locations</b>
15:50	Travel back to the A161 and turn left to travel south. Continue south on the A161 as it crosses over the A18. Turn right onto Hagg Lane before reaching the junction with the M180. Follow Hagg Lane, turning left where it forks. Turn right onto Stealgoose Lane and follow it south, parking around 479073, 408598. From here walk along the Public Right of Way BELT26 for about 1km until reaching 480086, 408476. And returning to vehicles.	PRoW (BELT 26) (480086, 408476)
16:30	Travel back to the A161 and turn left. Travel south along the A161 before turning left onto the M180. Travel east along the M180 before turning left onto the M181. Travel north on the M181 and continue on to the A1077. Take the second exit at the Frodingham Grange roundabout to remain on the A1077. Continue along the A1077 as it curves right and go straight at the next two roundabouts, taking the second exit at both. At the third roundabout take the first exit to head north on Normanby Road (B1430). Continue along Normanby Road through the next two roundabouts, taking the second exit at both. At the third, take the first exit on to Main Street. Continue along Main Street until turning left on to Flixborough Road. Park safely on Flixborough Road and walk to Viewpoint 11 before returning to vehicles.  Alternatively search the postcode DN15 9HD using a satellite navigation device and follow instructions.	Viewpoint 11: Public Right of Way (BURT171) (486790, 417360)
17:15	End of Accompanied Site Visit.	N/A

## 2.2 Health and Safety

2.2.1 Keadby Power Station is an operational power station site. For the safety of themselves and others, attendees will be required at all times to comply with the Applicant's applicable site security and safety requirements, for which a briefing will be provided. Each person will be required to wear Personal Protective Equipment (PPE), including hi-visibility jacket or vest, safety boots with ankle support, long sleeve clothing/ long trousers. Helmets will also be required when walking through operational areas. Where required, appropriate PPE can be provided by the Applicant and arranged with attendees, once confirmed by Deadline 4.