

Mr Christopher Butler
The Planning Inspectorate
(submitted via online portal only)

Our ref: AN/2021/132101/03-L01

Your ref: EN010114

Date: 25 February 2022

Dear Sir

**Keadby 3 Carbon Capture Power Station - Deadline 4 Representations
Environment Agency Unique Interested Party Ref - KDB3-SP091**

In accordance with the Examination Timetable, please find below the Environment Agency's submission in respect of:

- Comments on any information submitted for Deadline 3

1.0 Comment on the Applicant's response to Environment Agency Written Representation

1.1 The Environment Agency notes the Applicant's response (on page 41, document Ref 9.1 [[REP3-021](#)]) in respect of the technical feasibility of installing its chosen carbon plant, as follows:

EA comment	Applicant's response
<p>C6 Steam cycle – the Applicant has “confirmed that the CCGT can be configured to deliver this steam requirement from the HRSG and that the CCGT will be designed to provide this steam from the outset.” We asked that if the steam used comes from “the HRSG they need to justify this choice and demonstrate that it could be considered comparable, in terms of energy efficiency, to an integrated system taking steam from the turbine once carbon capture is operational.”</p>	<p>The only design the Applicant is considering is that whose sole steam source to the Carbon and Capture Plant is the steam turbine. This design is more efficient than one using steam from the HRSG.</p>

1.2 This response is satisfactory and accordingly the Environment Agency can confirm that the Applicant has set aside enough land to accommodate the carbon

capture plant, and has also now provided sufficient information for us to conclude that there are no foreseeable barriers to the technical feasibility of installing this.

- 1.3 The Environment Agency also notes the Applicant's response (on page 43, document Ref 9.1 [[REP3-021](#)]) in respect of disapplication of legislation in the Development Consent Order at Article 8.3:

EA comment	Applicant's response
In clause 8.3 of the draft Development Consent Order the Applicant seeks to disapply byelaws made under s66 of the Land Drainage Act 1991. The relevant byelaws which the Environment Agency enforce are the Anglian Water Authority Land Drainage and Sea Defence Byelaws. We would like clarification from the applicant which of these byelaws it wishes to disapply, the reason for seeking disapplication and the justification for it.	Article 8(3)(b) only relates to byelaws made by an internal drainage board. The Anglian Water Authority land Drainage and Sea Defence Byelaws are therefore not affected by this Article.

- 1.4 The Environment Agency welcomes the Applicant's clarification in respect of this clause.

Should you require any additional information, or wish to discuss these matters further, please do not hesitate to contact me on the number below.

Yours faithfully

Annette Hewitson
Principal Planning Adviser

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