



**Canal &  
River Trust**

Making life better by water

keadby3@planninginspectorate.gov.uk

Your Ref EN010114

Our Ref IPP-117

Thursday 21 April 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 and Request for Further Information raised by the Examining Authority for Deadline Six (Unique Reference : KDB3-SP090)

## Response to Questions Raised by the Examining Authority

### Question Q2.6.6 – Land/Rights Purchase Update

The Trust maintains its objection, however the Applicant and the Trust are continuing to progress discussions of a voluntary agreement that would allow the Trust to withdraw its objection. The Trust is pleased to confirm that negotiations are progressing on the voluntary acquisition of land and rights by the Applicant and agreement on other matters of concern to the Trust. However, the Trust considers that further progress needs to be made before the Trust will be in a position to withdraw its objection.

The Trust are hopeful that an agreement will be possible ahead of the close of the Examination that would allow its objection to be withdrawn.

### Question Q.2.16.6 – Wharf Management Plan

The Trust are pleased that the Applicant has amended the dDCO to seek to address its concerns, however, the amended wording still does not address the Trust's concern in full. As outlined in the Trust's deadline 5 response, the Trust consider that the scope of the wharf management plan should be to seek to avoid unexpected closures, not simply mitigate the risk. The Trust consider that the wording that was proposed at deadline 5 (copied below for reference) would suitably address this:

*“(c) A wharf management plan. The wharf management plans shall include amongst other things, provision for notification to CRT of abnormal load deliveries, and processes to avoid abnormal load deliveries resulting in obstructions to Keadby Lock outside of times agreed with the Trust.”*

Should the applicant be concerned about the need to accommodate delays at sea, then we suggest that the Management Plan should identify processes for when arrivals occur outside of agreed times.

## Canal & River Trust

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## Response to Request for Further Information by the Examining Authority

### Question 6 to Natural England and the Canal and River Trust

Proposals described in paragraph 5.2.51 of Appendix D of the Landscaping and Biodiversity Management and Enhancement Plan identify proposals to provide additional marginal vegetation next to the canal. This has the potential to help re-enforce the biodiversity potential of the canal corridor in this location, in line with the principles of paragraph 174 (part d) of the National Planning Policy Framework.

The Trust is aware that the existing condition of the canal bank is of low biodiversity value, as identified in the report, and note that the works proposed could help to improve the biodiversity potential of the canalside area.

Schedule 2 (part 6) of the latest draft DCO includes the need for the provision of a landscaping and biodiversity protection plan. We believe it is necessary for additional details to be provided as part of this requirement so that it can be ensured that the final design of works described in paragraph 5.2.51 will be suitable from an ecology and operations point of view. Notably, we believe it necessary for the final position of the coir rolls proposed to be positioned so that they do not interfere adversely with the operation and maintenance of the canal; we also consider it necessary for the species composition of the coir rolls to be identified so that it can be ensured that they will complement the biodiversity potential of the canal corridor.

Yours sincerely,

**Simon Tucker MRTPI**  
Area Planner

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