

Keadby 3 Carbon Capture Power Station (EN010114 / IP Ref: 20029046)

Deadline 6a submission

1. At Deadline 6 the Applicant proposed a number of changes to the definitions in the draft Development Consent Order intended to “*address all concerns articulated by ClientEarth*” (REP6-017, p. 11; see also the updated draft Development Consent Order REP6-019/020).
2. ClientEarth is satisfied that these changes address the concerns that ClientEarth has raised in the examination regarding the carbon capture and storage aspects of the proposed development. In particular, ClientEarth is content that the precise wording proposed by the Applicant serves to ensure that, subject to reasonable operating exceptions:
 - a. the generating station will only be operated commercially with carbon capture;
 - b. a minimum carbon dioxide capture rate of 90% will be achieved during commercial operation of the generating station; and
 - c. all captured carbon dioxide will be supplied to the National Grid gathering network for onward permanent storage.¹
3. ClientEarth would welcome the opportunity to comment on any subsequent changes to the Development Consent Order affecting the above outcomes and would also be happy to provide additional information or clarification if it would assist the Examining Authority.

¹ As previously explained (see e.g. REP5-051, p. 6), this is the basis upon which the proposed development has been assessed in the Environmental Statement.

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ClientEarth is an environmental law charity, a company limited by guarantee, registered in England and Wales, company number 02863827, registered charity number 1053988, registered office 10 Queen Street Place, London EC4R 1BE, a registered international non-profit organisation in Belgium, ClientEarth AISBL, enterprise number 0714.925.038, a registered company in Germany, ClientEarth gGmbH, HRB 202487 B, a registered non-profit organisation in Luxembourg, ClientEarth ASBL, registered number F11366, a registered foundation in Poland, Fundacja ClientEarth Poland, KRS 0000364218, NIP 701025 4208, a registered 501(c)(3) organisation in the US, ClientEarth US, EIN 81-0722756, a registered subsidiary in China, ClientEarth Beijing Representative Office, Registration No. G1110000MA0095H836. ClientEarth is registered on the EU Transparency register number: 96645517357-19. Our goal is to use the power of the law to develop legal strategies and tools to address environmental issues.