

KEADBY 3 CARBON CAPTURE POWER STATION

A collaboration between **SSE Thermal** and **Equinor**

Document Ref: 10.6

Planning Inspectorate Ref: EN010114

The Keadby 3 (Carbon Capture Equipped Gas Fired Generating Station) Order

Land at and in the vicinity of the Keadby Power Station site, Trentside, Keadby, North Lincolnshire

Proposed Development Changes: Environmental Statement (ES) Addendum Non-Technical Summary

The Planning Act 2008

The Infrastructure Planning (Applications: Prescribed Forms and Procedure Regulations 2009 - Regulation 5(2)(a) The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017

Applicant: Keadby Generation Limited

Date: May 2022

DOCUMENT HISTORY

Document Ref	10.6 Environmental Statement Addendum Non-Technical Summary
Revision	VP3.0 Change Request
Document Owner	AECOM

GLOSSARY

Abbreviation	Description
AGL	Above Ground Level
AIL	Abnormal Indivisible Load - a load that cannot be broken down into smaller loads for transport without undue expense or risk of damage. It may also be a load that exceeds certain parameters for weight, length and width.
AOD	Above Ordnance Datum - a spot height (an exact point on a map) with an elevation recorded beside it that represents its height above a given datum.
CCGT	Combined Cycle Gas Turbine - a highly efficient form of energy generation technology. A gas turbine burns gas to drive a turbine to generate electricity. Surplus heat from the turbine is used to generate steam that is used to generate further electricity.
CCP	Carbon Capture Plant – plant used to capture carbon dioxide (CO ₂) emissions produced from the use of fossil fuels in electricity generation and industrial processes.
CCUS	Carbon Capture, Usage and Storage – a group of technologies designed to reduce the amount of carbon dioxide (CO ₂) released into the atmosphere from coal and gas power stations as well as heavy industry including cement and steel production. Once captured, the CO ₂ can be either re-used in various products, such as cement or plastics (utilisation), or stored in geological formations deep underground (storage).
CDM	The Construction (Design and Management) Regulations 2015
CEMP	Construction Environmental Management Plan
CO ₂	Carbon Dioxide - an inorganic chemical compound with a wide range of commercial uses.
DCO	Development Consent Order - made by the relevant Secretary of State pursuant to The Planning Act 2008 to authorise a Nationally Significant Infrastructure Project. A DCO can incorporate or remove the need for a range of consents which would otherwise be required for a development. A DCO can also include rights of compulsory acquisition.

Abbreviation	Description
EIA	Environmental Impact Assessment - a term used for the assessment of environmental consequences (positive or negative) of a plan, policy, programme or project prior to the decision to move forward with the proposed action.
ES	Environmental Statement - a report in which the process and results of an Environment Impact Assessment are documented.
ExA	Examining Authority
FRA	Flood Risk Assessment - an assessment of the flood risk from all sources of flooding for a development
GHG	Greenhouse Gases - atmospheric gases such as carbon dioxide, methane, chlorofluorocarbons, nitrous oxide, ozone, and water vapour that absorb and emit infrared radiation emitted by the Earth's surface, the atmosphere, and clouds.
HRA	Habitats Regulations Assessment - the assessment of the impacts of implementing a plan or policy on a Natura 2000 site required under the Habitats Directive.
kV	Kilovolt – unit of electricity.
LBMEP	Landscaping and Biodiversity Management and Enhancement Plan
MW	Megawatt - unit of power.
NEP	Northern Endurance Partnership
NGCL	National Grid Carbon Limited
NH ₃	Ammonia
NLC	North Lincolnshire Council
NO _x	Oxides of Nitrogen
NSIP	Nationally Significant Infrastructure Project - defined by the Planning Act 2008 and cover projects relating to energy (including generating stations, electric lines and pipelines); transport (including trunk roads and motorways, airports, harbour facilities, railways and rail freight interchanges); water (dams and reservoirs, and the transfer of water resources); wastewater treatment plants and hazardous waste facilities. These projects are only defined as nationally significant if they satisfy a statutory threshold in terms of their scale or effect.
NSR	Noise Sensitive Receptor - locations or areas where dwelling units or other fixed, developed sites of frequent human use occur which may be sensitive to noise impacts.
NTS	Non-Technical Summary - a summary of the Environmental Statement written in non-technical language for ease of understanding.

Abbreviation	Description
Proposed PCC	Power and Carbon Capture site
PINS	Planning Inspectorate – executive agency of the Ministry of Housing, Communities and Local Government of the UK Government. It is responsible for determining final outcomes of town planning.
the 2008 Act	An Act of Parliament in the UK intended to speed up the process of approving major new infrastructure projects.
Keadby Power Station Site	The existing Keadby Power Station site, comprising the land owned by the Applicant.
Residual Effect	The predicted consequential change on the environment from the impacts of a development after mitigation.
Rochdale Envelope	An approach to consenting and environmental impact assessment, (EIA) named after a UK planning law case, which allows the promoters of development projects to broadly define their schemes within agreed parameters to retain flexibility of design.
Scoping	The process of identifying the issues to be addressed by the Environmental Impact Assessment process. It is a method of ensuring that an assessment focuses on the important issues and avoids those that are considered to be not significant.
SoS	The Secretary of State – the decision maker for DCO applications and head of Government department. In this case, the SoS for the Department for Business, Energy and Industrial Strategy (formerly the Department for Energy and Climate Change).
Stakeholder	An organisation or individual with a particular interest in a development project.
Visual Amenity	The enjoyment or benefit that people (individually or as a group) gain from a particular view that may change as a consequence of a proposed development during its construction, operation or decommissioning.
WFD	Water Framework Directive – European Union directive which commits member states to achieve good qualitative and quantitative status of all water bodies.
Worst-case assumption (or scenario)	An assumption adopted within an environmental impact assessment which identifies a scenario or parameter that would likely result in the maximum environmental effect (termed the worst-case). This is typically applied where uncertainty exists over the detail of a particular development component or approach to project delivery, for which a basis of assessment is needed.
WSI	Written Scheme of Investigation
ZCH	Zero Carbon Humber

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1.0 NON-TECHNICAL SUMMARY

1.1 Introduction

- 1.1.1 This document presents a Non-Technical Summary ('NTS') of an addendum to the Environmental Statement ('ES') that has been prepared to accompany the Development Consent Order ('DCO') Application by Keadby Generation Limited (KGL) ('the Applicant') for a proposed low carbon power station within Keadby Power Station site, near Scunthorpe, Lincolnshire. In this NTS, and throughout the ES, this is referred to as the 'Proposed Development'.
- 1.1.2 A DCO is required for the Proposed Development as it falls within the definition and thresholds for a 'Nationally Significant Infrastructure Project' (an 'NSIP'). The Applicant has therefore submitted an application to the Secretary of State (for Business, Energy and Industrial Strategy) under Section 37 of the Planning Act 2008 (the 2008 Act), seeking a DCO for the Proposed Development. If granted by the Secretary of State, the DCO will provide the necessary authorisations and consents for the construction, operation and maintenance of the Proposed Development.
- 1.1.3 The Proposed Development will be a Combined Cycle Gas Turbine (CCGT) power station like Keadby 1 and Keadby 2 Power Station but will also be fitted with 'First of a Kind' in the UK carbon capture plant (CCP) technology. Keadby 3 is

expected to offset at least 1.5MT of CO₂ – 15% of the Government's target, that would otherwise be emitted; equivalent to the annual energy use of over half a million homes in the UK. The Applicant would not build the CCGT without the CCP as the Applicant is committed to building a generating station which has a clear route to decarbonisation. The Proposed Development will therefore make a significant contribution towards the UK reaching its Net Zero greenhouse gas emissions target by 2050.

- 1.1.4 The Proposed Development includes the equipment required for the capture and compression of carbon dioxide emissions from the generating station so that it is capable of being transported off-site. National Grid Carbon Limited (NGCL) will be responsible for the development of the carbon dioxide pipeline network linking onshore power and industrial facilities, including the Proposed Development, in the Humber Region. The carbon dioxide export pipeline does not, therefore, form part of the Proposed Development and is not included in the Application but will be the subject of separate consent application(s) to be taken forward by NGCL.
- 1.1.5 All of the land included within the DCO boundary (or 'Order Limits') is referred to as 'the Proposed Development Site' for the purposes of the ES Addendum and this NTS and is described in Sections 3.0 and 4.0 of this NTS.

- 1.1.6 This document provides a summary of the ES Addendum which has been prepared to accompany the Application of Proposed Changes to the applied for DCO as if consulting under the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (as amended) ('the EIA Regulations').
- 1.1.7 Regulation 14(2) describes the requirements of an ES to include a NTS of the information. Therefore the purpose of this NTS is to describe the Proposed Development Changes and provide an overview of the key findings of the environmental assessment of these changes.
- 1.1.8 Throughout the ES Addendum and this NTS, references are given to the Examination Library numbers assigned by the Examining Authority (identified within square brackets, e.g. [APP-043]) for information previously accepted into examination and to the Applicant's document numbers ('Application Document Ref.' numbers) for documents which have yet to be assigned an Examination Library number by the Examining Authority.
- 1.1.9 During the Pre-Examination period and the early stages of Examination, the Applicant has continued to engage

extensively with stakeholders and has continued to develop its assumptions around the future construction and operation of the Proposed Development.

1.2 The Proposed Development Changes

- 1.2.1 The Applicant has submitted a request (the 'Change Request') for the following changes to the Proposed Development, together known as 'the Proposed Development Changes'.
- 1.2.2 The Proposed Development Changes have resulted from design contractor involvement, which has continued to refine the detail of this 'First of a Kind' Project implementation.
- Change No. 1 - Inclusion of riverbed within the Waterborne Transport Offloading Area (Railway Wharf) to be numbered in Schedule 1 of the DCO as **Work 10C**.
 - Change No. 2 – not used^[1].
 - Change No. 3 - Increase to the maximum heights of the carbon dioxide absorbers/ stacks, if two are installed.

^[1] The Applicant previously consulted on and, at Deadline 5, proposed another change ("Change No. 2 - Changes to the Additional Abnormal Indivisible Load Route largely within SSE land and all within existing Order Limits". This was subsequently withdrawn

by the Applicant by letter dated 26 April 2022 (REP6-018) and forms no part of the DCO examination.

- Change No. 4 - Increase to the maximum heights of the carbon dioxide stripper column.
- Change No. 5 - Increase in proposed soil import volumes to create a suitable development platform.

1.2.3 With the Proposed Development Changes, the Proposed Development Site would cover an area of 69.7 hectares (ha) (a minor increase of 0.3ha in the amount of the Applicant's land required).

1.2.4 At the time of writing the Examining Authority is minded to accept the Change Request (as submitted at Deadline 5 and modified at Deadline 6) as stated in a letter dated 29 April 2022 (**PD-019**) but has requested in the same letter that all documents and plans comprising the Change Request are submitted, and/or resubmitted, by the Applicant in a single package at Deadline 6a.

1.2.5 It is anticipated that following receipt of this single package the ExA will exercise discretion to accept the Change Request and from this point the Proposed Development Changes would form part of the Proposed Development for the remainder of the DCO examination.

1.3 The Applicant

1.3.1 The Applicant remains the same as detailed in the submitted DCO ES NTS, Keadby Generation Limited, a wholly owned

subsidiary of the FTSE-listed SSE plc, who are the freehold owner of a large part of the Proposed Development Site, one of the UK's largest and broadest-based energy companies, and the country's leading developer of renewable energy generation. Over the last 20 years, SSE plc has invested over £20bn to deliver industry-leading offshore wind, onshore wind, hydro, pumped storage, CCGT, energy from-waste, biomass, energy networks and gas storage projects. The Applicant owns and operates the adjacent Keadby 1 Power Station and is in the process of commissioning the Keadby 2 Power Station. SSE also operates the Keadby Windfarm which lies to the north and south of the Proposed Development Site and generates renewable energy from 34 turbines, with a total installed generation capacity of 68MW.

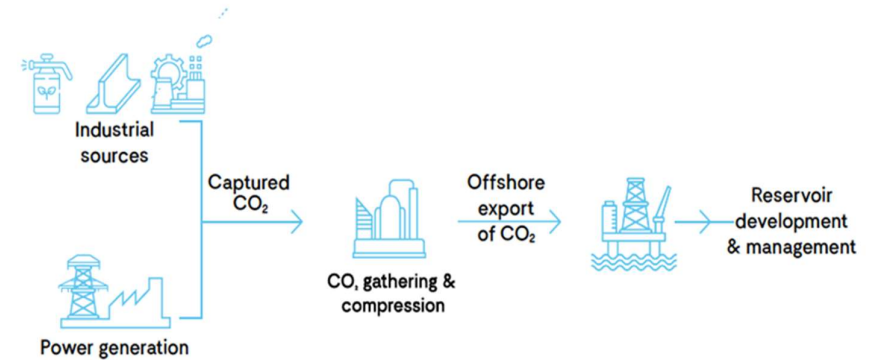
1.3.2 In November 2021, SSE announced its 'Net Zero Acceleration Programme' to accelerate clean growth, lead the energy transition and maximise value for all stakeholders. The programme is a fully-funded £12.5bn five-year strategic capital investment plan to 2026 focused on net zero infrastructure. It is expected that around 20% of the spend under the plan would be directed towards investments in flexible generation (including the Project), distributed energy and customer businesses. The design of the Proposed Development demonstrates this commitment. The Proposed Development will be built with a clear route to decarbonisation, being equipped with post-combustion carbon capture technology, consistent with SSE's

commitment to reduce the carbon intensity of electricity generated by 80% by 2030, compared to 2018 levels.

1.4 What is Carbon Capture, Usage and Storage (CCUS)?

1.4.1 CCUS is a process that removes carbon dioxide emissions at source, for example emissions from a power station or industrial installation, and then compresses the carbon dioxide so that it can be safely transported to 'secure storage, typically an underground geological site, preventing it from being released into the atmosphere. CCUS is crucial to reducing carbon dioxide emissions - the UK Government has committed to achieving Net Zero in terms of greenhouse gas emissions (GHG) by 2050. **Figure NTS1** shows what is involved in the process.

Figure NTS1: Illustration of the CCUS



2.0 ASSESSMENT METHODOLOGY

2.1 Environmental Impact Assessment ('EIA') Methodology

2.1.1 The general assessment methodology and topic-specific methodologies, relevant legislation, policy and guidance, key assumptions and limitations set out in submitted ES submitted with the Application [APP-045 to APP-050] remain unchanged, unless specifically stated in this ES Addendum.

Classification of effects

2.1.2 The below Matrix demonstrates the methodology applied in the ES and this Addendum to determine the significance of effects. In general, the classification of an effect is based on the magnitude (scale) of the impact and sensitivity or value/importance of the receptor, using the matrix shown in Table 1. Moderate and major effects are considered to be 'significant' for the purposes of the EIA Regulations in accordance with standard EIA practice.

Table 1: Classification of effects

Magnitude of Impact	Sensitivity/Importance of Receptor			
	High	Medium	Low	Very Low
High	Major	Major	Moderate	Minor
Medium	Major	Moderate	Minor	Negligible
Low	Moderate	Minor	Negligible	Negligible
Very Low	Minor	Negligible	Negligible	Negligible

2.2 EIA Scoping for the ES Addendum

2.2.1 **Chapter 12:** Water Environment and Flood Risk, **Chapter 16:** Socio-Economics, **Chapter 17:** Climate Change, **Chapter 18:** Major Accidents and Disasters, and **Waste & Materials** were scoped out of any further assessment, as the Proposed Development Changes would not result in any change in effect for these topics

2.3 Structure and Content of the ES Addendum

2.3.1 After introductory chapters describing the Proposed Development, Proposed Development Site, nature of

Proposed Development Changes, alternatives considered and legislation and policy updates in ES Addendum Volume I [APP 6.2.1- 6.2.7 Rev 03], ES Addendum Volume II contains the technical assessment chapters and appendices. ES Addendum Volume III presents figures accompanying the ES Addendum.

2.3.2 Other environmental information accompanying the submitted ES, which has been accepted by the ExA since acceptance of the Application and which is referenced in the ES Addendum includes;

- Waste Technical Note [OD-001];
- Updated Flood Risk Assessment (FRA) [AS-010];
- Habitats Regulations Assessment (HRA) Appropriate Assessment Report [REP1- 006].

2.4 Consultation

2.4.1 Consultation is important in the preparation of DCO Applications and in the EIA process. The 2008 Act requires applicants for development consent to carry out pre-application consultation on their proposals.

2.4.2 Following an approach discussed in advance with North Lincolnshire Council (NLC), informal consultation with key stakeholders on the Proposed Development Changes

occurred in early 2022. This included meetings with NLC, two public information days to consult with the local community and correspondence with other key stakeholders.

2.4.3 All the consultation responses received have been considered in the preparation of the ES Addendum and are set out in the Changes Application Consultation Statement (Application Document Ref. 10.3).

2.4.4 The format of the ES Addendum is outlined in **Table 2**.

Table 2: Format of the ES Addendum

ES Volume	Content
Volume I	<p>Sections 1 - 2 present an introduction to the ES Addendum and overview of the Proposed Development Changes.</p> <p>Section 3 presents a description of the Proposed Development Changes, explaining how each change updates the submitted Environmental Statement introductory chapters; Chapter 1: Introduction, Chapter 2: Assessment Methodology, Chapter 3: Site and Surrounding Areas, Chapter 4: The Proposed Development, Chapter 5: Construction Programme and Management and Chapter 6: - Alternatives. Chapter 7 provides and update to a summary of relevant legislation and planning policy.</p> <p>Section 4 presents a scoping assessment for the Proposed Development Changes in relation to the submitted ES Chapters 8 – 19 explaining which assessments require updating (and therefore which assessments are contained in Volume II, as appropriate) and which are scoped out.</p> <p>Section 5 presents an overview of consultation carried out on the Proposed Development Changes.</p>

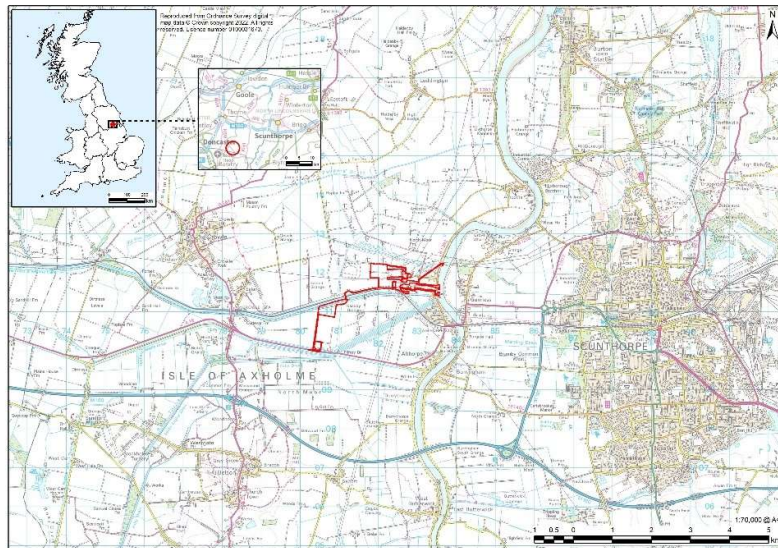
ES Volume	Content
Volume II – Chapters and Appendices	<p>Presents additional information to support Volume I. The findings of the updated environmental assessments, any changes to the likely significant effects identified, and mitigation, monitoring and enhancement measures proposed are presented in Volume II including relevant appendices. The following ES Addendum Chapters are presented:</p> <p>Chapter 8: Air Quality; Chapter 9: Noise and Vibration; Chapter 10: Traffic and Transport; Chapter 11: Biodiversity and Nature Conservation; Chapter 13: Geology, Hydrogeology and Land Contamination; Chapter 14: Landscape and Visual Amenity; Chapter 15: Cultural Heritage; and Chapter 19: Cumulative and Combined Effects. Chapter 20 provides a summary of the likely significant residual environmental effects identified for the Proposed Development.</p> <p>Appendix 8B: Operational Air Quality and Appendix 9B: Operational Noise are also updated.</p>
Volume III – Figures	<p>Presents figures that accompany ES Addendum Volume I.</p>
Non-Technical summary	<p>This stand-alone summary of the ES Addendum Volumes in non-technical language.</p>

3.0 DESCRIPTION OF EXISTING ENVIRONMENT

3.1 The Site and Surroundings

3.1.1 The Proposed Development Site is located within and near to the existing Keadby Power Station site near Scunthorpe, Lincolnshire, as shown on **Figure NTS2**, and is centred on national grid reference 482351, 411796.

Figure NTS2: Proposed Development Site Location Plan



3.1.2 The Keadby Power Station site includes the operational Keadby 1 Power Station and Keadby 2 Power Station (under commissioning). It falls within the administrative area of NLC.

3.1.3 Beyond the current Keadby Power Station site, land use is predominantly low lying farmland and scattered villages, however, the immediate site surroundings have been developed in recent years with power related infrastructure, including the operational Keadby Windfarm to the north and south of the Proposed Development Site and the pylons associated with the existing National Grid 400kV Substation located within the Proposed Development Site.

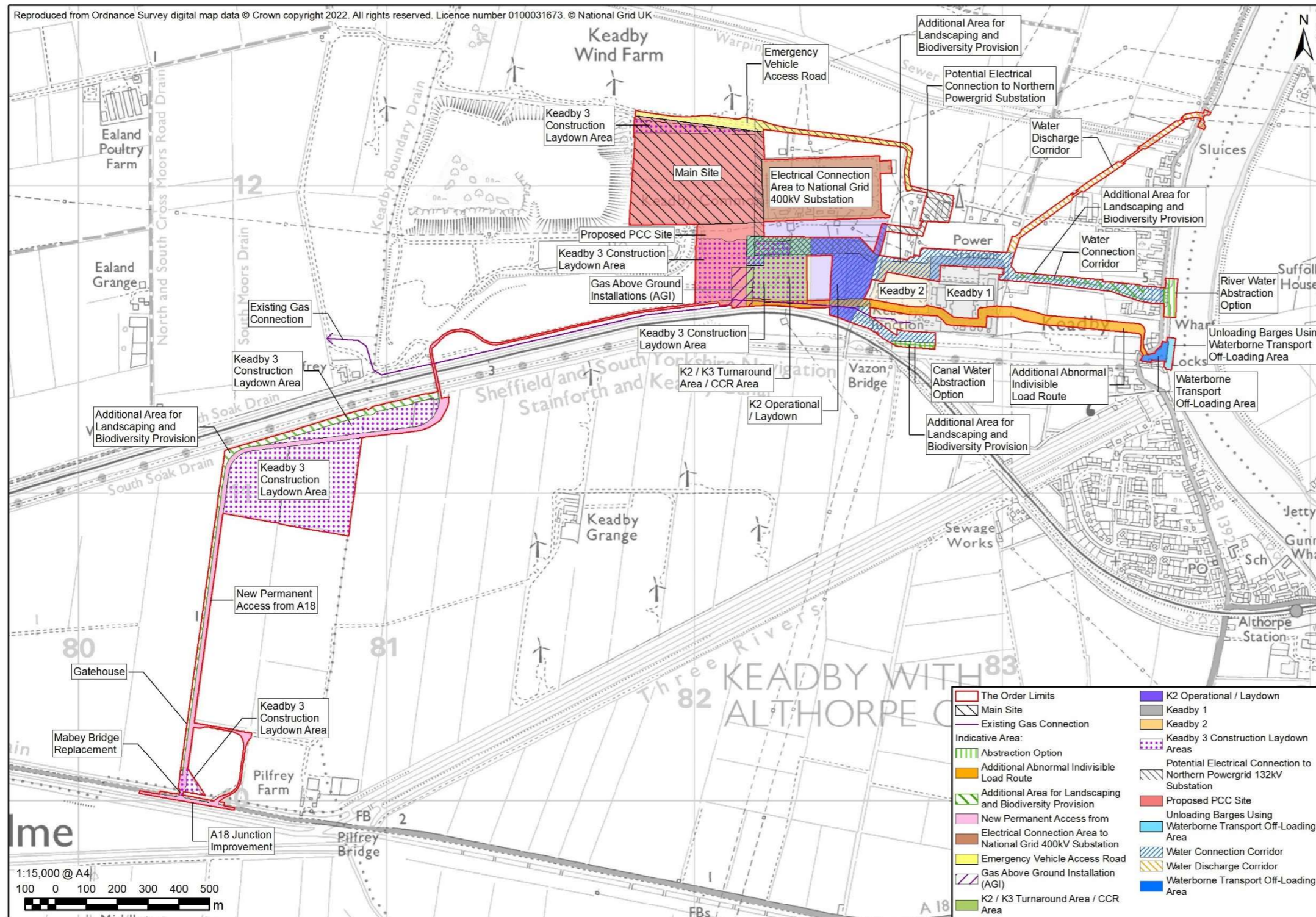
3.2 Parts of the Proposed Development Site

3.2.1 With the Proposed Development Changes, the Proposed Development Site now covers an area of 69.6 hectares (ha) (a minor increase of 0.3ha in the amount of the Applicant's land required).

3.2.2 Many components together make up the Proposed Development Site (and its incorporated changes) as shown in **Figure NTS3**, and for the purposes of the ES Addendum, the following names (described in Section 4.0 of this NTS) are used to describe parts of the Proposed Development Site:

- The Proposed Power and Carbon Capture site (Proposed PCC Site) which includes an area referred to as the 'Main Site';
 - Electrical Connection Area to National Grid 400kV Substation;
 - Potential 132kV Electrical Connection from Northern Powergrid Substation;
 - Emergency Vehicle Access Road;
 - Land within the Keadby Power Station site for the purposes of facilitating connections to the Proposed Development for natural gas supply (Gas Connection Area), and other necessary infrastructure (including 'Water Connection Corridor');
 - Water Connection Corridors including River Water Abstraction Option and Canal Water Abstraction Option and Water Discharge Corridor;
 - Waterborne Transport Offloading Area;
 - Additional Abnormal Indivisible Load (AIL) Route;
 - Construction Laydown Areas;
 - Construction and Operational Vehicular Site Access Route and Gatehouse;
 - A18 Junction Improvement and Mabey Bridge replacement; and
 - Additional area for Landscaping and Biodiversity Provision.
- 3.2.3 The Proposed Development Changes affecting these parts of the proposed project are discussed below at Section 4.2.

Figure NTS3: Areas of the Proposed Development Site Referred to in the ES Addendum

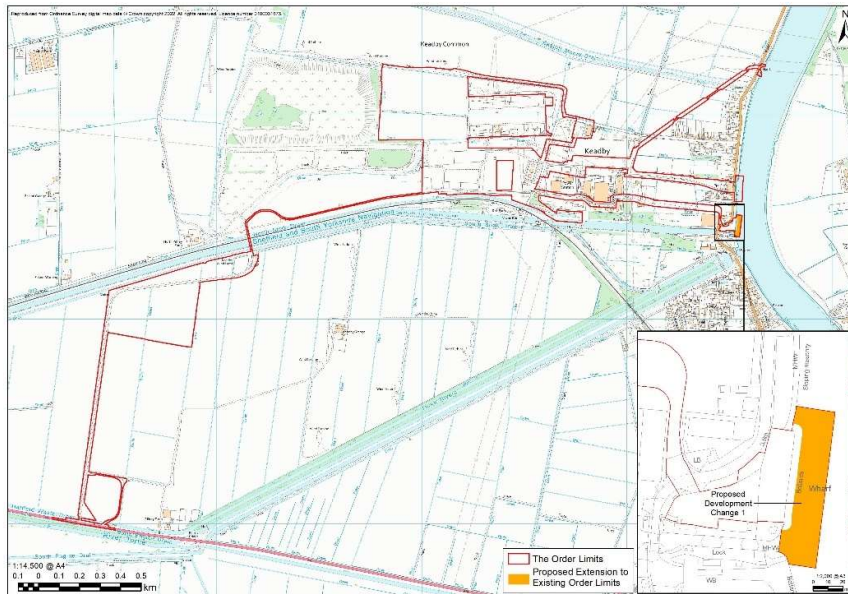


Existing land use (Proposed Development Changes)

3.2.4 The majority of the Proposed Development Changes are located within the Order Limits submitted with the DCO Application (as shown on [APP-101]). However, one minor change to the Order Limits as a result of the Proposed Development Changes is required, as shown on Figure NTS5 below.

3.2.5 The Proposed Development Change that affects the Order Limits is Proposed Development Change 1: addition of a section of river bed to be used by moored vessels in the Waterborne Transport Off-loading Area.

Figure NTS4: Order Limit Changes



4.0 THE PROPOSED DEVELOPMENT

4.1 Components of the Proposed Development

4.1.1 Despite the Proposed Development Changes, the components of the Proposed Development remain unchanged from those described in **Chapter 4: The Proposed Development** (ES Volume 1 – Application Document Ref. 6.2.4) [**APP-047**].

4.2 Proposed Changes to the Proposed Development

Introduction

4.2.1 The Applicant is proposing four changes to the Proposed Development. The Proposed Development Changes set out in this report have resulted from design contractor involvement, which has continued to refine the detail of this ‘First of a Kind’ Project implementation.

4.2.2 The Proposed Development Changes are:

- **Change 1: Extension of Waterborne Transport Offloading Area to incorporate land within the River Trent (Work No. 1C)**
- An increase in the extent of land included in the Order Limits within the River Trent which would be occupied by delivery vessels is proposed in order to accommodate the largest (82m long) potential vessels,

as used during the construction of Keadby 2 Power Station . Where vessels are required to be moored for the full tide cycle, they could require use of the sea bed, which is Crown Land and as such, it is intended to negotiate voluntarily for rights for this (**Work No. 10B**).

- **Change 3: Increase to the maximum parameters (height) for up to two absorbers/ stacks.** Ongoing engagement with design contractors has identified that in the event that two absorbers are required for the removal of CO₂ from flue gases within the CCP (Work No. 1C), the twin absorber units and stacks may extend to a maximum height of up to 80m above ground level (AGL) for the absorber towers and an additional up to 15.5m in height for the stacks i.e. up to 95.5m AGL in total, which equates to a maximum of 98.3m Above Ordnance Datum (AOD) for each absorber and associated stack. These maximum dimensions – established through ongoing design development - are approximately 20m higher than those previously assessed for the twin absorber option in the submitted ES and presented as a parameter in the draft DCO [**APP-005**], albeit they are still lower than the maximum height assessed for the single absorber option.
- **Change 4: Increase to the maximum parameters (height) for carbon dioxide stripper column.** Ongoing design development with design contractors has identified that the proposed CO₂ stripper column (also

Work No. 1C) may have a maximum height of up to 63m AGL, which equates to a maximum of 65.8m AOD which is 10m higher than was included as a parameter in the draft DCO [APP-005].

- **Change 5: Increase in proposed soil import volumes.** Ongoing design development and engagement with design contractors has identified that additional volumes of soil and fill material may need to be imported to provide a suitable platform for foundations and site levels across the Proposed PCC Site, taking into account anticipated ground conditions and the revised finished floor level (revised from 2.6m AOD up to 2.8m AOD based on an updated Flood Risk Assessment). Up to 180,000m³ of soils may need to be imported, representing an increase of 50,000m³ over the volume previously presented in the submitted ES. However no material change to the timing of the peak of construction would be required as a result of the soil import increase.

4.2.3 **Figure NTS5** shows the visualisation of the Proposed PCC Site based upon the proposed revised maximum dimensions, twin absorbers and the change to the Proposed Development Site boundary.

Figure NTS5: Visualisation of the Proposed PCC Site based upon maximum dimensions and twin absorbers



4.2.4 **Figures NTS6 and NTS7** show an indicative layout of the Proposed PCC Site. **Figure NTS6** shows the indicative layout of the Proposed PCC Site with a single absorber installed. **Figure NTS7** shows the indicative layout of the Proposed PCC Site based on the twin absorber option. The CCGT and CCP including absorber stack(s) would still be located within the defined **Work Areas 1A and 1C (Application Document Ref. 4.3)** i.e. within the Main Site on the northern part of the Proposed PCC Site.

Figure NTS6: Indicative Proposed PCC Site Layout Single Absorber

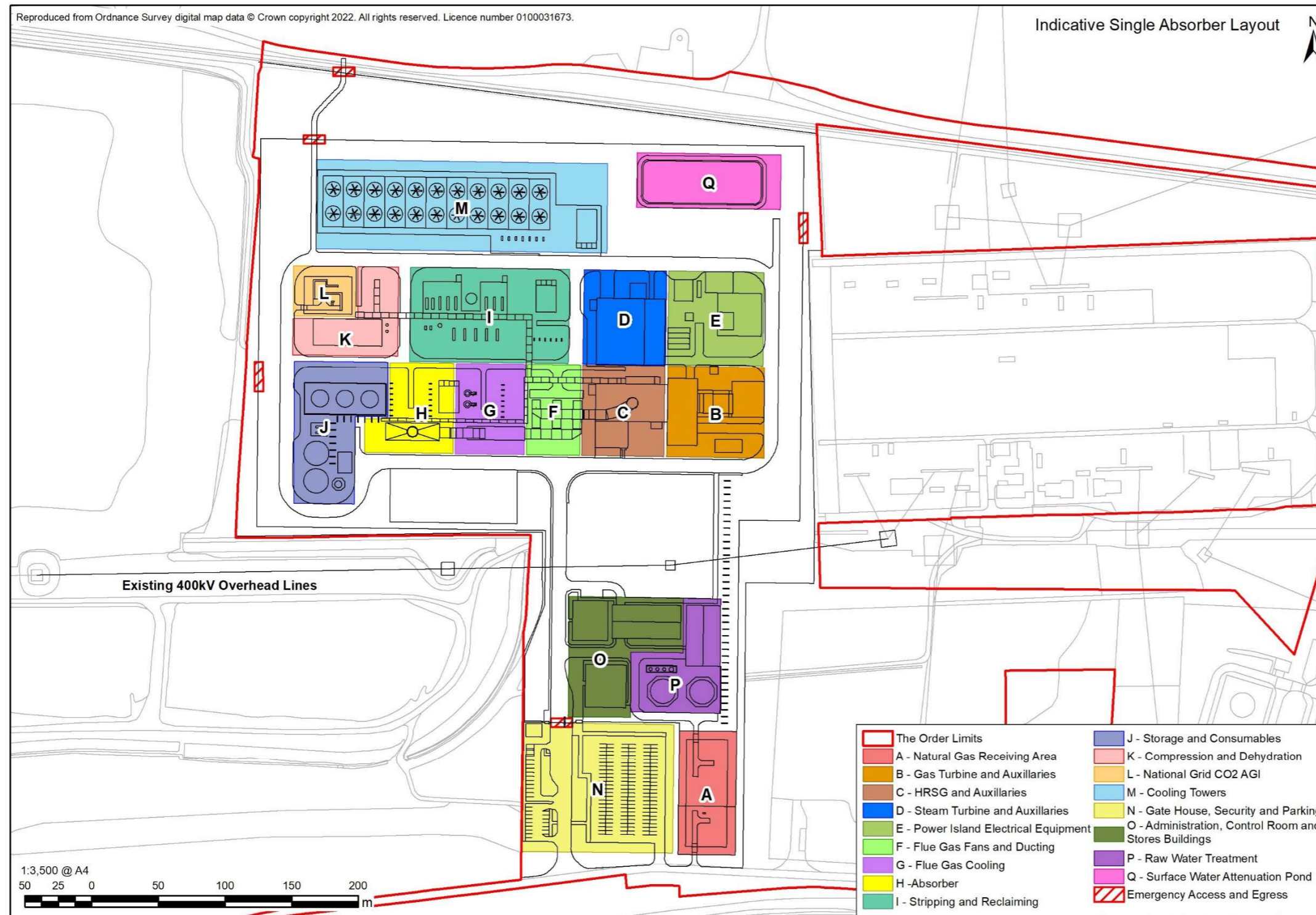
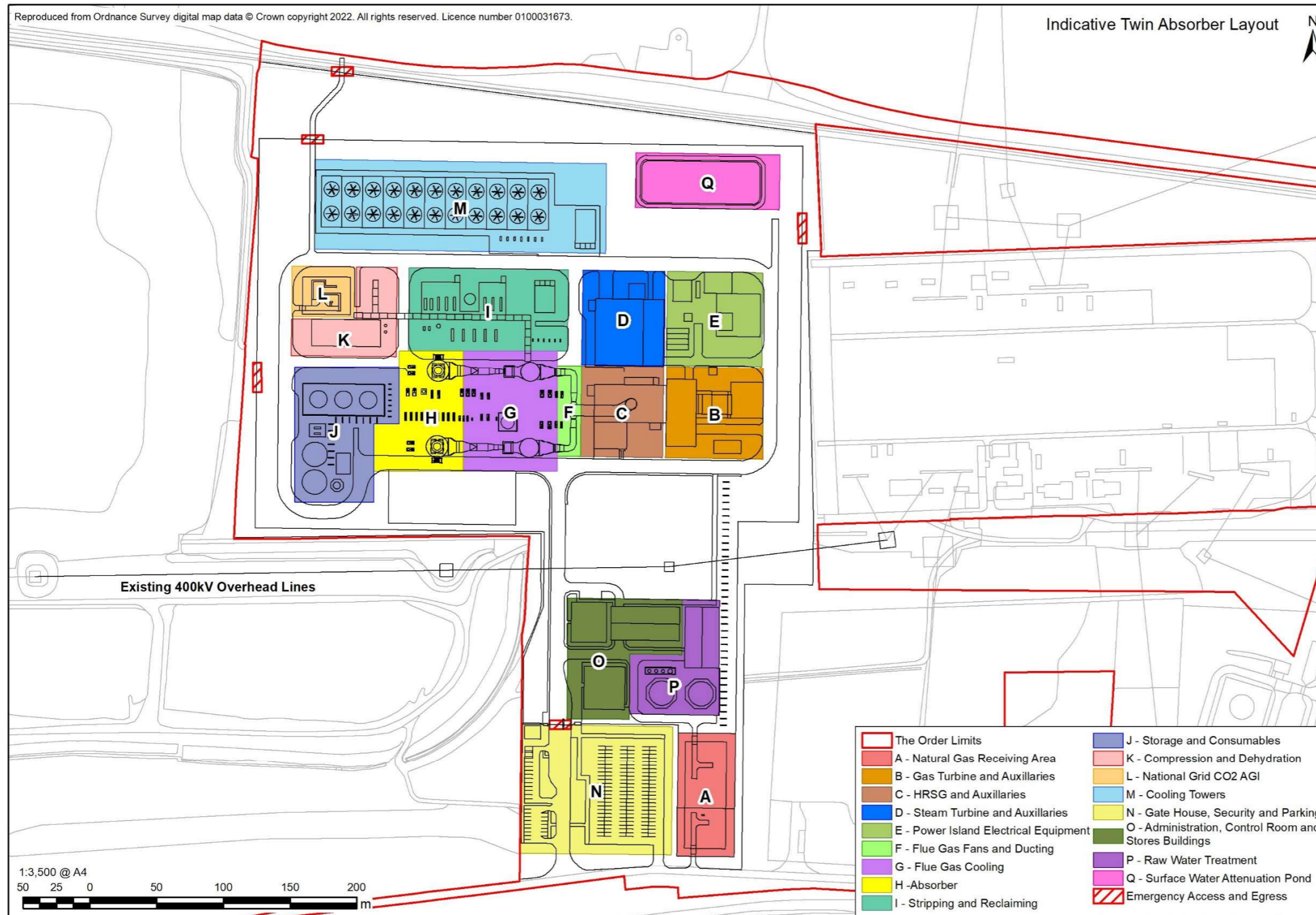


Figure NTS7: Indicative Proposed PCC Site Layout Twin Absorber



4.3 Proposed Development Construction

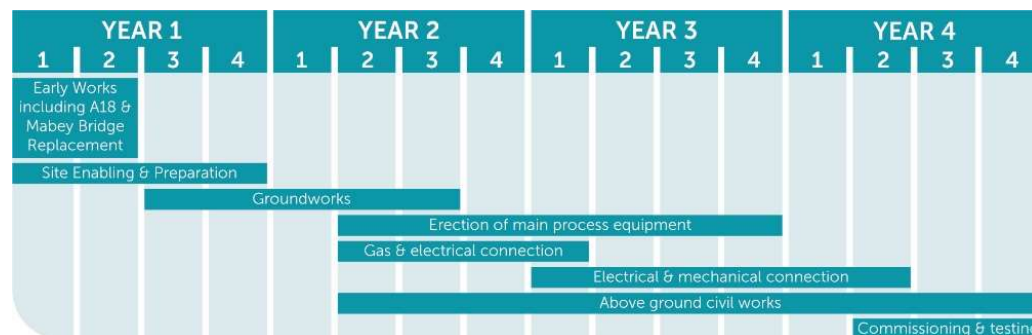
4.3.1 The construction timing/ programme reported in Section 5.2 of Chapter 5: Construction Programme and Management is not changed as a result of the Proposed Development Changes; construction of the Proposed Development could (subject to the necessary consents being granted and an investment decision being made) potentially start shortly after a consent being granted, although a more likely programme would be early in 2023. Construction activities are expected to be completed within three to four years, followed by commissioning; however, detailed phasing will be the responsibility of the appointed construction contractor(s).

4.3.2 Each environmental assessment topic within the submitted ES and ES Addendum identifies and assesses the reasonable ‘worst-case’ construction scenario for that topic, where relevant. The DCO Application seeks consent for commencement of development up to seven years from the date of granting of consent. For this reason, a scenario where construction commences later in the programme - up to 2029 - has also been assumed as a reasonable worst-case for some technical assessments in the ES, such as Traffic and Transport.

4.3.3 The Applicant would appoint contractor(s) to undertake the construction phase of the Proposed Development.

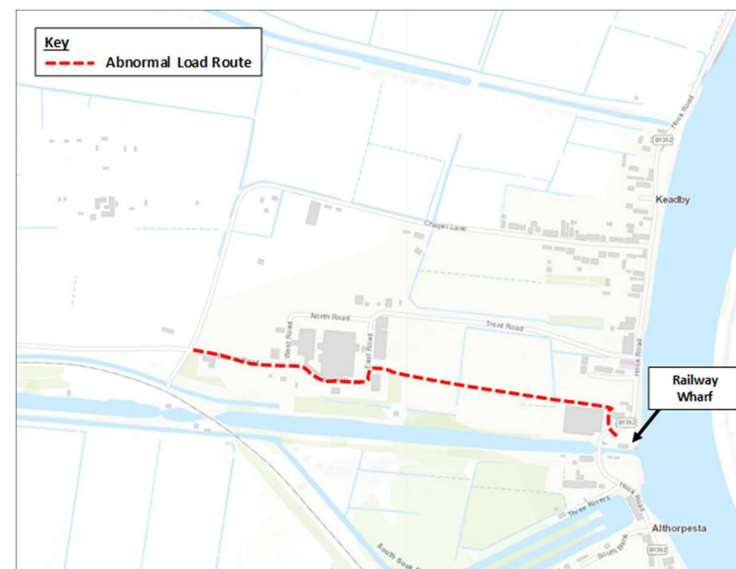
4.3.4 An indicative construction programme is outlined in **Table 3** below.

Table 3: Indicative Construction Programme



- 4.3.5 The Core construction working hours remain unchanged and are proposed to be 07:00 to 19:00 Monday to Friday (except bank holidays) and 08:00 to 13:00 on Saturdays. However, as outlined in the submitted ES, it is likely that some construction activities may need to be undertaken outside of these core working hours, subject to prior agreement with NLC.
- 4.3.6 A detailed Construction Environmental Management Plan (CEMP) will be prepared prior to construction. The submission, approval and implementation of this will be secured by a Requirement of the draft DCO [APP-005]. A Framework CEMP [APP-160] has been prepared and is submitted accompanying the DCO Application. The Framework CEMP revised at deadline 3 [REP3-010] sets out the key measures to be employed during construction to control and minimise the impacts on the environment.
- 4.3.7 All enabling and construction works will be undertaken in accordance with the Construction Design and Management Regulations (2015) (CDM Regulations) (HMSO, 2015)
- 4.3.8 Changes in the construction activities from those assessed in the submitted ES as a result of the Proposed Development Changes are described below:
- **Proposed Development Change 1** does not result in any changes to construction activities.

Figure NTS8: Abnormal Indivisible Load Route from Wharf



- **Proposed Development Changes 3 & 4:** do not result in any changes to construction activities.
- **Proposed Development Change 5:** An increase of up to 50,000m³ above the previously presented volume of 130,000 m³ related to the maximum proposed import volumes for soil (described in **Chapter 5: Construction Programme and Management [APP-048]** is proposed to provide a suitable platform for foundations and buildings/

equipment across the PCC Site during construction. In part this change is due to the increase in required site levels from 2.6m AOD to 2.8m AOD as identified by the updated Flood Risk Assessment that was submitted into Examination at Deadline 1.

4.4 Proposed Development Operation

There will be no changes to the operation of the Proposed Development as a result of the Proposed Development Changes.

4.5 Proposed Development Decommissioning

There will be no changes to the decommissioning of the Proposed Development as a result of the Proposed Development Changes.

5.0 CONSIDERATION OF ALTERNATIVES TO THE PROPOSED DEVELOPMENT CHANGES

5.1 Introduction

5.1.1 The EIA Regulations state that an ES (and therefore an ES Addendum) should include a description of reasonable and relevant alternatives studied by an applicant, taking into account potential environmental effects. **Chapter 6: Consideration of Alternatives [APP-049]** provides this information in the submitted ES; in respect of the Proposed Development Changes the alternatives considered are discussed below and will be included in the ES Addendum.

5.2 Alternatives considered

5.2.1 Alternative sites were considered at the outset, the relative maturity of each Low Carbon Cluster was a key factor in decision making and a reason why the Keadby Power Station site was selected as a priority over other potential sites. This can be further reviewed in Application Document Reference 1.1 Application Cover Letter.

5.2.2 **Proposed Development Change 1** (extension of Waterborne Transport Offloading Area to incorporate land within River Trent). The alternative to making this change would be to make no change; this would involve reducing the size of the largest boats that could be moored at the wharf, leading to more fabrication being required on site and

potentially more road transport movements, and has therefore not been considered further.

5.2.3 **Proposed Development Change 3** (increase to the maximum parameters (height) for the twin absorbers/stacks):

- The technology licensor(s) considers that, based on the current level of design information, there is a need to increase the maximum height of the twin absorbers and stacks, recognising that the detailed design may be able to reduce the heights from the maxima presented.
- No alternative consent routes are possible and a change to the DCO Application is required to authorise the extra height of the twin absorbers. The alternative to making this change would therefore be to make no change, which could restrict the technology selection of the Proposed Development.

5.2.4 **Proposed Development Change 4** (increase to the maximum parameters for CO₂ stripper column):

- The technology licensor(s) considers that, based on the current level of design information, there is a need to increase the maximum height of the stripper, recognising that the detailed design may be able to reduce the height from the maximum presented.

- No alternative consent routes are possible and a change to the DCO application is required to authorise the extra height.
- The alternative to making this change would therefore be to make no change, which could restrict the technology selection of the Proposed Development.

5.2.5 **Proposed Development Change 5** (increase in proposed soil import volumes):

- No alternatives to this Proposed Development Change are available, as this is driven by the ground level increase required by the Environment Agency. This proposed change allows the higher elevation site platform to be constructed while minimising the risk of ground conditions being unsuitable for the Proposed Development.

5.2.6 **Consulted on but since withdrawn and no longer being progressed Change 2 - Changes to the Additional Abnormal Indivisible Load Route, largely within the Applicant's land**

- For AIL arriving at the Waterborne Transport Offloading Area, the Applicant proposes to use the route solely through Keadby Power Station, although an alternative to this route was previously considered as part of the change request application submitted at Deadline 5 in order to minimise potential risks associated with

abnormal loads traversing the operational Keadby Power Station site. The Applicant has therefore considered an alternative northern extension of the Additional AIL Route.

- The alternative Additional AIL Route would have resulted in removal of vegetation that would have required compensation/ enhancement of affected vegetation but would otherwise have resulted in no material difference in significant adverse environmental effects compared to the Proposed Additional AIL Route which has already been assessed in the Application.

6.0 SUMMARY OF POTENTIAL ENVIRONMENTAL EFFECTS OF PROPOSED DEVELOPMENT CHANGES

- 6.1.1 This section presents a summary of the likely environmental effects predicted to occur as a result of the Proposed Development Changes.
- 6.1.2 A scoping exercise has been carried out to determine which environmental assessments and topics to be scoped in and out of the assessment within the ES Addendum, given the nature of the Proposed Development Changes. Assessment of the environmental effects of the Proposed Development Changes for each of the topics that have been scoped for inclusion is presented in the ES Addendum Volume I and its accompanying technical appendices (ES Volume II).

Table 4: Likely significant effects resulting from the Proposed Development Changes

Chapter	Description of change/ likely significant effect resulting from change to the indicative Order Limits and Proposed Development Changes
1-7	Chapters 1 – 7 are non- technical chapters and therefore do not report changes in significance and magnitude of environmental effects
8	<p>There are no changes to the magnitude or significance or introduction of any new significant effects within Chapter 8: Air Quality resulting from the Proposed Development Changes and the changes would not result in significant effects on air quality receptors.</p> <p>Change 1 – no change</p> <p>Change 3 An assessment of emissions resulting from the revised parameters for the twin absorbers option has been undertaken, however there are no new or different significant operational air quality impacts or effects at human health receptors as a result of Proposed Development Change 3.</p> <p>At ecological receptors, the results from the modelling of the two absorber stacks indicate that the concentrations of NO_x and NH₃ are very slightly higher at the majority of the ecological receptors assessed; due to wider pollutant dispersal, although the overall level of impact remains comparable to those presented within Chapter 8: Air Quality (ES Volume I – Application Document Ref. 6.2.8) [APP-051].</p> <p>Change 4 – no change</p> <p>Change 5 – no change</p>
9	There are no adverse changes to the significance of effects assessment on noise sensitive receptors (NSR), or introduction of any new significant effects, within Chapter 9: Noise and Vibration .

Chapter	Description of change/ likely significant effect resulting from change to the indicative Order Limits and Proposed Development Changes
	<p>Change 1 – no change</p> <p>Change 3 Modelling and assessment of operational noise levels resulting from the revised parameters and additional information for the twin absorbers option has been undertaken. However, there are no new or different significant operational noise effects as a result of Proposed Development Change 3.</p> <p>Change 4 – no change</p> <p>Change 5 – no change</p>
10	<p>There are no changes to the magnitude or significance or introduction of any new significant effects within Chapter 10: Traffic and Transport as a result of the Proposed Development Changes. The proposed increase in soil or fill volume import to the Proposed Development Site remains within the Rochdale Envelope assessed in the submitted ES and does not change the conclusions presented in that ES chapter.</p>
11	<p>There are no changes to the magnitude or significance or introduction of any new significant effects within Chapter 11: Biodiversity and Nature Conservation or the Habitats Regulations Appropriate Assessment resulting from the Proposed Development Changes.</p> <p>Unrelated to the Change Request, the Applicant is submitting a revised Landscaping and Biodiversity Management and Enhancement Plan (LBMEP) at Deadline 6 to demonstrate its proposals for Biodiversity Net Gain using a methodology released by Natural England since the Application was submitted.</p>
12	<p>There are no changes to the magnitude or significance or introduction of any new significant effects within Chapter 12: Water Environment and Flood Risk resulting from the Proposed Development Changes and the changes would not result in significant effects on water receptors, Water Framework Directive ('WFD') compliance, navigation or flood risk.</p>

Chapter	Description of change/ likely significant effect resulting from change to the indicative Order Limits and Proposed Development Changes
	<p>Change 1 – An extension of the Waterborne Transport Offloading Area is proposed to incorporate land within the River Trent to enable mooring of vessels during loading/ unloading while taking into account tidal changes. The Navigation Risk Assessment already takes account of this scenario and there is no change to the assessment in Chapter 12: Water Environment and Flood Risk (ES Volume I – Application Document Ref. 6.2.12) [APP-055].</p> <p>Change 3 – There would be no material change to the significance of effects on water dependent ecological sites arising from atmospheric deposition of emissions from the increased height of the twin absorbers/ stacks. The dispersion modelling of the twin absorber stacks indicates that while the concentrations of NO_x and NH₃ are very slightly higher at the majority of the ecological receptors assessed, the overall level of impact remains comparable to those presented with Chapter 8: Air Quality (ES Volume I – Application Document Ref. 6.2.8) [APP-051].</p> <p>Change 4 – There would be no new or different significant construction or operational effects to the water environment and flood risk, in comparison with Chapter 12: Water Environment and Flood Risk (ES Volume I – Application Document Ref. 6.2.12) [APP-055].</p> <p>Change 5 – There would be no new or significantly different construction or operational effects to the water environment and flood risk, in comparison with Chapter 12: Water Environment and Flood Risk (ES Volume I – Application Document Ref. 6.2.12) [APP-055].</p> <p>Water Environment and Flood Risk was therefore scoped out of requiring further assessment within the ES Addendum.</p>
13	<p>There are no changes to the magnitude of significance or introduction of any new significant effects within Chapter 13: Geology, Hydrogeology and Land Contamination resulting from the changes to the Order Limits and the changes would not result in significant effects on geology, hydrogeology or contaminated land.</p>
14	<p>There are no changes to the magnitude or significance or introduction of any new significant effects within Chapter 14: Landscape and Visual Amenity resulting from the changes to the indicative Order Limits.</p>

Chapter	Description of change/ likely significant effect resulting from change to the indicative Order Limits and Proposed Development Changes
	<p>Change 1 - There would be no new or different significantly construction or operational effects to landscape and visual amenity receptors as a result of the Proposed Development Changes.</p> <p>Change 3 - It is expected that Proposed Development Change 3 would result in a marginal increase in massing of tall structures associated with the twin absorber option but would result in no change in the overall nature of views from identified representative viewpoints. It is judged that there would be no increase in the level of impact on receptors in comparison to the single absorber column/ stack (assessed as worst-case scenario) within Chapter 14: Landscape and Visual Amenity (ES Volume I – Application Document Ref. 6.2.14) [APP-057].</p> <p>Change 4 - Construction operations including plant and activity associated with the Proposed Development Change would be of a similar scale and nature to those assessed in the submitted ES and would not change the assessment of construction effects. No new significant construction effects on landscape and visual amenity receptors are judged to occur as a result of the Proposed Development Change. The Proposed Development Change would result in the marginal increase in visibility of one of the structures, but it is judged that this Change would not increase the level of impact on receptors and there would be no change to the level of significance of effect on landscape receptors, visual receptors and dynamic views.</p> <p>Change 5 – no change.</p> <p>The Proposed development Changes do not result in new or a change to existing significant effects for decommissioning and do not require any additional mitigation, monitoring or enhancement measures.</p>
15	<p>Chapter 15: Cultural Heritage</p> <p>Change 1 – no change.</p>

Chapter	Description of change/ likely significant effect resulting from change to the indicative Order Limits and Proposed Development Changes
	<p>Change 3 - Even with the proposed increased height of the twin absorbers, the level of significance of effect on heritage assets remains lower than that assessed for the larger single absorber option presented in the submitted ES; therefore, the originally assessed moderate adverse effect, as identified in Chapter 15: Cultural Heritage (ES Volume I – Application Document Ref. 6.2.15) [APP-058], remains.</p> <p>There are no new or different significant operational effects to cultural heritage as a result of the Proposed Development Changes in comparison with Chapter 15: Cultural Heritage (ES Volume I – Application Document Ref. 6.2.15) [APP-058].</p> <p>There are no new or different significant decommissioning effects to cultural heritage as a result of the Proposed Development Changes in comparison with Chapter 15: Cultural Heritage (ES Volume I – Application Document Ref. 6.2.15) [APP-058].</p> <p>No additional mitigation measures are required as a result of the Proposed Development Changes, above those stated in Chapter 15: Cultural Heritage (ES Volume I – Application Document Ref. 6.2.15) [APP-058].</p>
16	<p>There are considered to be no changes to Chapter 16: Socio-Economics and Appendix 16A: Population and Health Signposting and Human Health conclusions resulting from the Proposed Development Changes. Appendix 16A: Human Health conclusions therefore remain unchanged. Socio Economics and Population and Health were therefore scoped out of requiring further assessment within the ES Addendum.</p>
17	<p>There are considered to be no changes to Chapter 17: Climate Change and Sustainability and Appendix 17A: Sustainability Review resulting from Proposed Development Changes. Climate Change and Sustainability were therefore scoped out of requiring further assessment within the ES Addendum.</p>
18	<p>There are considered to be no changes to Chapter 18: Major Accidents and Disasters resulting from the Proposed Development Changes. Major Accidents and Disasters was therefore scoped out of requiring further assessment within the ES Addendum.</p>
19	<p>There are considered to be no changes to Chapter 19: Cumulative and Combined Effects resulting from the Proposed Development Changes.</p>

Chapter	Description of change/ likely significant effect resulting from change to the indicative Order Limits and Proposed Development Changes
20	There are considered to be no changes to Chapter 20: Summary of Likely Significant Residual Effects resulting from the Proposed Development Changes.

7.0 SUMMARY AND CONCLUSIONS

- 7.1.1 The ES Addendum presents the findings of the EIA assessment undertaken for the Proposed Development Changes and includes an assessment of the potential environmental impacts and effects of the Proposed Development Changes during construction, operation (including maintenance, where appropriate) and decommissioning.
- 7.1.2 Section 6.0 of this NTS and **Chapters 8-11, Chapters 13-15 and Chapter 19** (ES Addendum Volume II – **Application Document Ref. 6.2.8 – 6.2.15 and 6.2.19 – Rev 03**) and accompanying appendices have considered how the Proposed Development Changes may alter the potential environmental impacts and effects of the Proposed Development (after mitigation and enhancement measures are taken into account).
- 7.1.3 The assessment has been undertaken following Rochdale Envelope principles whereby worst-case assumptions have been used for any aspects where the final design selection cannot yet be made and flexibility must be retained.

8.0 REFERENCES

Department of Energy and Climate Change, Overarching National Policy Statement for Energy (EN-1) (London, The Stationery Office, 2011)

Department of Energy and Climate Change, National Policy Statement for Fossil Fuel Electricity Generating Infrastructure (EN-2) (London, The Stationery Office, 2011)

Department of Energy and Climate Change, National Policy Statement for Gas Supply Infrastructure and Gas and Oil Pipelines (EN-4) (London, The Stationery Office, 2011)

Department of Energy and Climate Change, National Policy Statement for Electricity Networks Infrastructure (EN-5) (London, the Stationery Office)

Her Majesty's Stationery Office, The Planning Act 2008

Planning Inspectorate (PINS) (2018a) Advice Note Nine – Using the Rochdale Envelope

Planning Inspectorate (PINS) (2018b) Advice Note Twelve Transboundary Impacts and Process.

Planning Inspectorate (PINS) (2020) Scoping Opinion: Proposed Keadby 3 Low Carbon Gas Power Station Development

The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009.

The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017.