Submission ID: 15943

Responses to questions posed to EA, NE and the Applicant in the RIES report and comments on the RIES report.

Part 1 of the Report
Keadby 3 now has its DCO and therefore the cumulative effects of both Keadby 2 and 3 and the proposed development are a reality and will have likely significant effects on the Humber Estuary Special Protection Area (SPA), Special Area of Conservation (SAC) and Ramsar. â€œThe ROC Report to Inform HRA [AS-016] concluded that the Proposed Development would be likely to give rise to significant effects, either alone or in-combination with other projects or plansâ€• on the Humber Estuary Special Protection Area (SPA), Special Area of Conservation (SAC) and Ramsar.

Part 2 of the Report

2.44.4 â€œThe Original Report to Inform HRA [REP2-019] concluded that the Proposed Development would be likely to give rise to significant effectâ€• on the Thorne and Hatfield Moors SPA and Thorne Moor SAC. How has it now been decided there are now no likely significant effects?

2.5.9 of the RIES report states: â€œ24 hour NOx, the PC is >10% of the critical level at the Humber Estuary SAC and Ramsar. LSE could not be excludedâ€•, â€œTable 7 â€“NH3: paragraph 4.4.3.3 states that levels exceeded the PC threshold of 1% and the PEC threshold of 70% at the Humber Estuary SAC and Ramsar. LSE could not be excludedâ€• and â€œTable 10 â€“ nitrogen deposition: paragraph 4.4.6.1 states that the PC exceeds 1% of critical load and the PEC exceeds the 70% thresholds for Atlantic salt meadow and estuary habitat types at the Humber Estuary SAC and Ramsar. LSE could not be excludedâ€•. These pollutants not only will have a detrimental effect on the wildlife in the areas and the designated sites, but also to human health.

2.5.12 of the RIES report : â€œ[REP2-019] concluded that when considering the combined PC of the projects, there is potential for exceedances of the 1% critical level/ load for NH3 and nitrogen deposition at the Humber Estuary SAC, Ramsar and SPA, and the Thorne Moor SAC and Thorne and Hatfield Moors SPA. Similarly, for acid deposition, the combined PC of the projects could exceed the 1% critical load at Thorne Moor SAC. LSE could therefore not be excluded.â€•

Reference to Table 2.3 : Other issues raised in the Examination to date by the ExA and NE in relation to the Applicant's screening of LSEs

Table ID 2.1.4 can the applicant make it clear what pilling they will be using as they seem to keep changing their mind and why has no clear assessment for either type of piling not been made and the impacts this would have, particularly on noise levels. Both the effects of piling on the natural environment and humans needs to be clearly stated by the applicant. Could the piling affect the integrity of the wharf and any of the buildings that currently exist on it?

2.1.9 Noise/ vibration/ light disturbance to bird features using FLL during construction and operation information concerns me as it does appear there are species of birds that will be affected at the site and at the noted sites nearby.

Part 3 of the Report: ADVERSE EFFECTS ON INTEGRITY

3.1.3 is a matter of concern that NE are stating that all sites in the Report to Inform HRA are in an

â€˜unfavourable condition'. The effects of the proposal alongside Keadby 2 and 3 surely would make these sites even less favourable.

Table 3.1
3.1.4. How can the applicant secure these specific timings of noise, vibration and light disturbances not to impact birds at the specified times: October and March?

3.1.6. How does the applicant propose to justify to NE how the increase in nitrogen in the SSSI, which is already in an unfavourable condition, be offset? No amount of compensation can take away the damage caused to SSSIs.