KEADBY I REPLACEMENT OVERHEAD LINE &
KEADBY II OVERHEAD LINE WORKS, KEADBY
POWER STATION SITE, NORTH LINCOLNSHIRE

KEADBY DEVELOPMENTS LIMITED -
APPLICATIONS UNDER SECTION 37 OF THE
ELECTRICITY ACT 1989 (AS AMENDED)

PLANNING STATEMENT

Date: October 2016
Ref: 2941C
CONTENTS

1.0 INTRODUCTION .............................................................................................................. 1
2.0 LEGISLATIVE CONTEXT ........................................................................................................ 3
3.0 THE PROPOSED OVERHEAD LINE WORKS ........................................................................ 5
4.0 PRE-APPLICATION CONSULTATION & EIA SCREENING ............................................. 7
   Pre-application consultation........................................................................................................ 7
   EIA screening............................................................................................................................... 8
5.0 PLANNING POLICY .............................................................................................................. 9
   National Policy ............................................................................................................................ 9
   Local Development Plan Policy ................................................................................................ 13
6.0 PLANNING ASSESSMENT ................................................................................................. 15
   The need for the overhead line works....................................................................................... 15
   Consideration of alternatives ..................................................................................................... 15
   Land use ...................................................................................................................................... 16
   Noise and vibration .................................................................................................................... 16
   Air Quality .................................................................................................................................. 17
   Ground conditions and contamination ..................................................................................... 17
   Ecology ........................................................................................................................................ 18
   Cultural heritage ........................................................................................................................ 19
   Landscape and visual .................................................................................................................. 19
   Flood risk .................................................................................................................................... 20
   Traffic and transport .................................................................................................................. 20
   Electric and magnetic fields ......................................................................................................... 21
   Waste .......................................................................................................................................... 21
   Cumulative effects ...................................................................................................................... 21
   Mitigation and environmental management ............................................................................... 21
   Wayleaves ................................................................................................................................... 22
7.0 CONCLUSIONS .................................................................................................................. 23

APPENDICES

APPENDIX 1: TABLE OF RESPONSES FROM STATUTORY/NON-STATUTORY CONSULTEES
APPENDIX 2: COPY OF LETTER TO RESIDENTS AND EXHIBITION MATERIALS
APPENDIX 3: EIA SCREENING OPINIONS

<table>
<thead>
<tr>
<th>Revision</th>
<th>Description</th>
<th>Originated</th>
<th>Checked</th>
<th>Reviewed</th>
<th>Authorised</th>
<th>Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Final</td>
<td>GB/RB</td>
<td>GB</td>
<td>GB</td>
<td>GB</td>
<td>17.10.16</td>
</tr>
</tbody>
</table>

DWD Job Number: 2941C
1.0 INTRODUCTION

1.1 This Planning Statement has been prepared by Dalton Warner Davis LLP on behalf of Keadby Developments Limited (‘KDL’) ‘the Applicant’, in respect of two applications that have been submitted to the Secretary of State (‘SoS’) for Business Energy and Industrial Strategy (‘BEIS’) under section 37 'Consent required for overhead lines' of the Electricity Act 1989 (the ‘1989 Act’). The applications relate to both replacement and new overhead electric lines at the Keadby Power Station site (the ‘Keadby site’), near Scunthorpe, North Lincolnshire.

1.2 KDL is proposing to construct a new combined cycle gas turbine power station (Keadby II) to the west of the existing Keadby I Power Station. Keadby II is currently the subject of a section 36C application under the Electricity Act 1989 (the ‘1989 Act’) to vary the original 1993 consent so as to increase the generating capacity from 710 megawatts (‘MW’) to 820 MW amongst other changes.

1.3 Once Keadby II is constructed it will need to be connected to the National Grid (‘NG’) electricity transmission system. Keadby I has an existing connection to the NG electricity transmission system by means of two separate overhead electric lines and associated transmission towers, which connect with the main Keadby 400 kilovolt (‘kV’) NG substation to the west of this connection. The presence of these overhead lines to the west constrains the ability of Keadby II to connect to the NG substation. In order to overcome this constraint the following overhead line works are proposed:

- **Application 1 (the proposed 'Keadby I Replacement Overhead Line')** - the existing Keadby I connection with the NG substation (connecting to the south-east of the NG substation) will be replaced by a new overhead line. This will run from the existing transmission tower to the north of the Keadby I site to a new transmission tower, approximately 70 metres to the south-east corner of the substation, before connecting into the substation via a spare bay. The approximate length of the replacement line will be 285 metres.

- **Application 2 (the proposed 'Keadby II Overhead Line')** - a new overhead line will be installed, running from the Keadby II site to the existing transmission tower close to the south-east corner of the NG substation (currently used for the existing Keadby I connection). This will connect into the substation via the existing Keadby 1 bay. The approximate length of the new section of line will be 240 metres.

1.4 Both of the proposed overhead lines will have a nominal capacity exceeding 132kV (up to 400kV).
1.5 The need that exists for Keadby II in national energy policy terms is set out in detail within the Planning Statement that forms part of the section 36C application. The Planning Statement (and other section 36C application documents) can be viewed at: http://sse.com/whatwedo/ourprojectsandassets/thermal/keadby2

1.6 The two section 37 applications comprise this Planning Statement and the following documents:

- Application cover letter.
- Form B (Type II) Parts I and II.
- Schedule 1: Compliance with Section 37 Application Requirements.
- Site Location Plan at 1:2500
- Layout Plan 'Existing and Proposed Overhead Lines' @ 1:2500
- Environmental Information Report.

1.7 Each application is also accompanied by the relevant fee of £700.00.

1.8 Notice of the section 37 applications is to be published in the Scunthorpe Telegraph and Epworth Bells for two consecutive weeks on 20 October and 27 October in accordance with regulation 5 'Publication of notice of application for consent under section 37' of ‘The Electricity (Applications for Consent) Regulation 1990’ (as amended).

1.9 This Planning Statement provides further information on the proposed overhead electric line works and is structured as follows:

- Section 2 - sets out the legislative context for the applications.
- Section 3 - describes the proposed overhead line works in more detail.
- Section 4 - provides details of the pre-application consultation undertaken by the Applicant and the EIA scoping process.
- Section 5 - summarises the planning policy of most relevance to the proposed overhead line works.
- Section 6 - provides a planning assessment of the overhead line works having regard to relevant planning policy and other material considerations.
- Section 7 - sets out the conclusions of the Planning Statement.
2.0 LEGISLATIVE CONTEXT

2.1 Section 37 'Consent required for overhead lines', sub-section (1) of the Electricity Act 1989 (the '1989 Act') provides that:

"(1) Subject to [subsections (1A) to (2)] below, an electric line shall not be installed or kept above ground except in accordance with a consent granted by the Secretary of State."

2.2 An 'electric line' is defined at section 64, sub-section 1 of the 1989 Act as:

"electric line" means any line which is used for carrying electricity for any purpose and includes, unless the context otherwise requires-

(a) any support for any such line, that is to say, any structure, pole or other thing in, on, by or from which any such line is or may be supported, carried or suspended;

(b) any apparatus connected to any such line for the purpose of carrying electricity; and

(c) any wire, cable, tube, pipe or other similar thing (including its casing or coating) which surrounds or supports, or is surrounded or supported by, or is installed in close proximity to, or is supported, carried or suspended in associated within, any such line;...

2.3 The proposed replacement and new overhead electric lines fall within the definition of an 'electric line' and unless an exception applies, consent is required under section 37 of the 1989 Act. In addition, planning permission will be required. On granting a consent under section 37, the Secretary of State ('SoS') may give a direction that planning permission be deemed to be granted.

2.4 Before considering whether an exception applies under the 1989 Act, it is first necessary to consider whether the proposed overhead line works form in themselves, or are part of, a nationally significant infrastructure project (a 'NSIP') requiring development consent under the Planning Act 2008 (the 'PA 2008')

2.5 NSIPs are defined at section 14 of the PA 2008 and include (section 14(1)(b)) the installation of an electric line above ground. However, section 16(3) of the PA 2008 (as amended by 'The Planning Act 2008 (Nationally Significant Infrastructure Projects) (Electric Lines) Order 2013') provides that:

"(3) The installation of an electric line above ground is not within section 14(1)(b)-

(aa) if the length of the line (when installed) will be less than two kilometres,..."

2.6 As each of the proposed sections of overhead line are significantly below 2 kilometres in length (285 and 240 metres respectively) neither represents a NSIP.
2.7 It therefore falls to be considered whether either of the overhead lines is exempt from the requirement to obtain consent under section 37 of the 1989 Act by virtue of any of the exceptions contained in 'The Overhead Lines (Exemption) (England and Wales) Regulations 2009'. Those exceptions include the following, as provided by regulation 3(1)(e):

"...the installation or keeping installed, subject to the limitations in regulation 4 and the provisions of regulation 5, of an electric line (no part of which is within a European site or an SSSI) which replaces an existing line whether or not it is installed in the same position as the existing line in question;"

2.8 The proposed overhead line works include a replacement line of approximately 285 metres in length (Application 1 - the proposed 'Keadby I Replacement Overhead Line'). However, having considered the proposed replacement line against regulations 4 and 5, it is considered that it would not be exempt from the requirement for consent under section 37 on the basis that the distance between the new transmission tower (to carry the line) and the existing line exceeds the 60 metres specified by regulation 4(1)(d).

2.9 In view of the above, each of the proposed overhead lines is considered to require consent under section 37. This position was confirmed to the Applicant by BEIS during the pre-application discussions relating to the proposed overhead line works.

2.10 Schedule 9 of the 1989 Act 'Preservation of amenity and fisheries' states that:

"(1) In formulating any relevant proposals, a licence holder or a person authorised by exemption to generate, transmit, distribute or supply electricity-

(a) Shall have regard to the desirability of preserving natural beauty, of conserving flora, fauna and geological or physiographical features of special interest and of protecting sites, buildings and objects of architectural, historic or archaeological interest; and

(b) Shall do what he reasonably can to mitigate any effect which the proposals would have on the natural beauty of the countryside or on any such flora, fauna, features, sites, buildings or objects."

2.11 In considering any relevant proposals for which his consent is required under section 37 the SoS shall have regard to the above. It will be demonstrated in Section 5 of the Planning Statement that the proposed works will preserve amenity in accordance with Schedule 9.
3.0 THE PROPOSED OVERHEAD LINE WORKS

3.1 As stated in Section 1, Keadby Developments Limited (‘KDL’) is proposing to construct a new combined cycle gas turbine power station (Keadby II) to the west of the existing Keadby I Power Station. Keadby II is currently the subject of a section 36C application under the Electricity Act 1989 (the '1989 Act') to vary the original 1993 consent so as to increase the generating capacity from 710 megawatts ('MW') to 820 MW amongst other changes.

3.2 The Keadby Power Station site (the ‘Keadby site’) including the land to which the Keadby II application relates, is located approximately 500 metres to the west of Keadby Village and the River Trent. The edge of the built-up area of Scunthorpe is located approximately 3 kilometres to the east across the River Trent. The site can be accessed from the B1392, which runs along the western bank of the River Trent. This in turn connects with the A18, which provides access to both the M181 to the east and the M180 (via the A161) to the south. The surrounding land is flat and low lying, being used primarily for arable farming. The wind turbines associated with the Keadby Wind Farm development are located to the north and west of the site.

3.3 Once Keadby II is constructed it will need to be connected to the National Grid (‘NG’) electricity transmission system. Keadby I has an existing connection to the NG electricity transmission system by means of two separate overhead lines and associated transmission towers, which connect with the main Keadby 400 kilovolt ('kV') NG substation to the west of this connection. The presence of these overhead lines to the west constrains the ability of Keadby II to connect to the NG substation. In order to overcome this constraint the following overhead line works are proposed:

- **Application 1 (the proposed 'Keadby I Replacement Overhead Line')** - the existing Keadby I connection with the NG substation (connecting to the south-east of the NG substation) will be replaced by a new overhead line. This will run from the existing transmission tower to the north of the Keadby I site to a new transmission tower, approximately 70 metres to the south-east corner of the substation, before connecting into the substation via a spare bay. The approximate length of the replacement line will be 285 metres. The existing section of overhead line (approximately 310 metres in length) running from the transmission tower to the north-east of the Keadby I site to the existing transmission tower at the south-west corner of the substation will be removed.

- **Application 2 (the proposed 'Keadby II Overhead Line')** - a new overhead line will be installed, running from the Keadby II site to the existing transmission tower close to the
south-east corner of the NG substation (currently used for the existing Keadby I connection). This will connect into the substation via the existing Keadby I bay. The approximate length of the new section of line will be 240 metres.

3.4 The new transmission tower will be of lattice steel construction and will be of the tension type, which allows deviation of the overhead line at it passes through the tower. The tower will have an approximate height of 44 metres. To place this in context, the existing towers that carry the Keadby I connections to the NG substation are approximately 44.2 metres in height.

3.5 The new sections of overhead line will pass over Chapel Lane (which connects with the B1392 to the east). The lines will have a minimum clearance of 9.2 metres over the road, which is the same minimum clearance as the existing Keadby I connections.

3.6 It is proposed that there will be a 30 metre working width along the full length of the new overhead lines and a 50 metre working area around the new transmission tower.

3.7 The location and alignment of the new overhead lines and the location of the new transmission tower and the associated working widths/areas are shown upon Figure 2.1.

3.8 The Environmental Information Report (Figure 2.2) contains a visualisation of how the new overhead lines and transmission tower will appear once in place.

3.9 Further detail on the proposed overhead lines works, their design and the methods of construction/installation are provided within the Environmental Information Report (Section 2).

3.10 The Applicant has secured the requisite rights through agreements with the relevant landowners, in the event that there are any minor variations, rights can be procured from additional parties.
4.0 PRE-APPLICATION CONSULTATION & EIA SCREENING

4.1 This section provides details of the pre-application consultation undertaken by the Applicant in addition to the Environmental Impact Assessment (‘EIA’) screening process followed.

Pre-application consultation

4.2 The Applicant’s pre-application consultation included:

- statutory and key non-statutory consultees; and
- local residents.

4.3 The Applicant wrote to the local planning authority (North Lincolnshire Council) and 15 statutory (e.g. the Environment Agency) and key non-statutory (e.g. RSPB) consultees on 17 May 2016 to provide information on the proposed overhead line works. The letters were sent by Royal Mail recorded delivery and were accompanied by a draft EIA Screening Report. The letters requested that any comments be provided by 15 June 2016 (a period of 28 days from the receipt of the letters).

4.4 Responses were received from nine of the consultees, including the Environment Agency, the Health & Safety Executive, Highways England, Historic England, the Met Office, the MoD, National Grid, Natural England and NATS. The majority of responses from consultees confirmed that they had no comments/concerns. The Environment Agency identified the need for contamination to be considered in relation to piling and recommended the inclusion of additional text on flood risk within the draft EIA Screening Report, while Highways England requested the inclusion of further details on construction activities and recommended that construction environmental and traffic management plans be produced, including preferred routes for HGVs accessing the site. No other substantive issues were raised by any of the consultees.

4.5 A table detailing the responses received from the statutory and non-statutory consultees is contained at Appendix 1.

4.6 In terms of public consultation, letters were hand delivered to 3736 local residents living within the surrounding area of the Keadby site on 23 May 2016. The letters advised residents of the proposed overhead line works and provided details of the following public exhibitions to be held on 9 and 10 June 2016:

- St. Oswalds Hall, Keadby - Thursday 9 June 2016 between 6 and 8pm.
- Ealand Victory Hall, Ealand - Friday 10 June 2016 between 10am and 1pm.
4.7 The letter also provided details of how information on the proposed overhead line works could be viewed in electronic form on the project website and hard copy at two venues (Scunthorpe Civic Centre and Crowle Community Hub) within the vicinity of the Keadby site.

4.8 The letter requested that comments be provided by 8 July 2016. Copies of the letter sent to residents and the exhibition materials are contained at Appendix 2.

4.9 The public exhibition held in Keadby was attended by seven people, with that at Ealand attended by 14 people. The majority of the comments received at both exhibitions related to people seeking clarification as to whether new overhead lines were proposed off the Keadby site that will potentially affect their properties. The Applicant was able to clarify that the proposed overhead line works will be within the vicinity of the existing overhead lines at the site and that there were no proposals for new lines within the wider area. Some comments were also received relating to the potential visual impact of the proposed works.

**EIA screening**

4.10 The Applicant submitted applications requesting EIA screening opinions to the SoS on 23 June 2016 in respect of both the proposed Keadby I Replacement Overhead Line and the Keadby II Overhead Line.

4.11 The two applications were accompanied by a final version of the EIA Screening Report (that had been issued in draft as part of the pre-application consultation) that had been amended to take account of the consultation responses received from statutory/non-statutory consultees. The EIA Screening Report included the information required by regulation 5 of the Electricity Works (Environmental Impact Assessment) (England and Wales) Regulations 2000 (as amended).

4.12 The SoS issued screening opinions on 1 August 2016 confirming that neither the Keadby I or Keadby II overhead line works would be likely to result in significant effects on the environment and that therefore they do not represent EIA development. Of relevance is that in reaching this view the SoS noted that neither overhead line would:

"...pass within any "sensitive areas" as defined in the regulations including but not limited to: Sites of Special Scientific Interest, European sites, National Parks, the Broads and Areas of Outstanding Natural Beauty, World Heritage Sites or Scheduled Monuments..."

4.13 A copy of the screening opinions is contained at Appendix 3.
5.0 PLANNING POLICY

5.1 This section summarises the planning policy of most relevance to the proposed overhead line works, including national policy and local development plan policy.

National Policy

National Policy Statements

5.2 The Planning Act 2008 (the 'PA 2008') introduced a new system for examining and determining nationally significant infrastructure project ('NSIPs') as defined by section 14 of the PA 2008.

5.3 The policy framework for NSIPs is provided by National Policy Statements ('NPSs'). Section 5 of the PA 2008 allows the Secretary of State ('SoS') to designate NPSs setting out national policy in relation to the types of infrastructure set out at Section 14 of the Act.

5.4 Section 1 of the PA 2008 confirms that where NPSs are in place, these shall be the primary basis for decisions by the SoS on applications for NSIPs.

5.5 In July 2011, the SoS for the Department of Energy and Climate Change (now Business, Energy and Industrial Strategy - BEIS), designated a number of NPSs relating to nationally significant energy infrastructure. These included an 'Overarching NPS for Energy (EN-1)' setting out the Government's overall policy for the delivery of nationally significant energy infrastructure in addition to five technology-specific NPSs. The technology specific NPSs should be read in conjunction with EN-1 where relevant.

5.6 While the proposed overhead line works do not represent a NSIP, it is relevant to note that paragraph 1.2.1 of EN-1 states that:

"...In England and Wales this NPS is likely to be a material consideration in decision making on applications that fall under the Town and Country Planning Act 1990 (as amended)"

5.7 Furthermore, the SoS has confirmed through a recent decision (16 September 2015) to grant a section 36 consent for a new 1800 MW CCGT generating station on land at Sutton Bridge that the NPSs for energy are material to his decision-making.

5.8 The energy NPSs will therefore be a material consideration in the SoS's determination of the applications for section 37 consent (and deemed planning permission) made in respect of the proposed overhead line works.

5.9 The 'need' that exists for new gas-fired generating stations, such as Keadby II, is clearly set out within EN-1. Notably, paragraph 3.1.3 of EN-1 states that the SoS should:
"...assess applications... for the types of infrastructure covered by the energy NPSs on the basis that the Government has demonstrated that there is a need for those types of infrastructure and that the scale and urgency of that need is as described for each of them..."

5.10 Paragraph 3.1.4 goes on to state that the SoS should give substantial weight to the contribution that all projects would make toward satisfying this need. As such, the need that exists for new energy infrastructure, such as Keadby II, is not open to debate or interpretation and is clearly confirmed by EN-1.

5.11 The need for Keadby II is examined in detail within the Planning Statement (Section 4) that forms part of the section 36C application. The proposed overhead line works would support Keadby II by providing the necessary connections to allow it to export electricity to the National Grid.

5.12 The technology specific NPS of most relevance to the proposed works is the NPS for 'Electricity Networks Infrastructure' ("EN-5").

5.13 Part 1, ‘Introduction’, paragraph 1.8.2 of EN-5 confirms that the NPS covers “…above ground electricity lines whose nominal voltage is expected to be 132kV or above...”.

5.14 Part 2 ‘Assessment and Technology-Specific Information’ considers the impacts and other matters that are specific to electricity networks infrastructure. Section 2.2 deals with factors influencing site selection by applicants. Paragraph 2.2.2 recognises that the general location of electricity network projects if often determined by the location, or anticipated location of generating stations and the existing network infrastructure taking electricity to centres of energy use. This gives a locationally specific beginning and end to a line. This is clearly the case in relation to the proposed overhead line works, which are required to facilitate the connection of Keadby II to the existing NG substation.

5.15 Paragraph 2.2.3 notes that in order to install, inspect, maintain, repair, adjust, alter, replace or remove an electric line (above or below ground) and any related equipment, the applicant either needs to own the land or to hold sufficient rights over, or interest in that land (typically in the form of an easement), or to have permission from the owner in the form of a wayleave. At present the Applicant has secured the requisite rights agreements with the relevant landowners, in the event that there are any minor variations, rights can be procured from additional parties.

5.16 Paragraph 2.2.6 highlights that in developing their proposals, applicants will be:

“...influenced by Schedule 9 to the Electricity Act 1989, which places a duty on all transmission and distribution licence holders, in formulating proposals for new electricity networks infrastructure, to
have regard to the desirability or preserving natural beauty, of conserving flora, fauna and geological or physiographical features of special interest and of protecting sites, buildings and objects of architectural, historic or archaeological interest: and ...do what [they] reasonably can to mitigate any effect which the proposals would have on the natural beauty of the countryside or on any such flora, fauna, features, sites, buildings or objects.”

5.17 With regard to the above, it is notable that in confirming that the proposed works do not represent EIA development, the SoS referred to the fact that they do not pass within any sensitive areas, including, but not limited to, Sites of Special Scientific Interest (‘SSSIs’), European sites, National Parks, the Broads and Areas of Outstanding Natural Beauty (‘AONBs’), World Heritage Sites or Scheduled Monuments. The Environmental Information Report that forms part of the section 37 applications demonstrates that the works would not have a harmful impact upon natural beauty, flora or fauna or other features of interest.

5.18 EN-S goes on to confirm that applicants and decision makers should have regard to the following matters when considering the potential impacts of electric lines:

- Climate change adaptation (2.4) – the extent to which the proposal would be vulnerable and, as appropriate, how it would be resilient to flooding, wind and storms, temperature changes and earth movement or subsidence caused by flooding or drought.

- Consideration of good design (2.5) – proposals should demonstrate good design in their approach to mitigating potential adverse impacts.

- Biodiversity and geological conservation (2.7) – proposals should have regard to impacts on bird flight and migration corridors, feed, hunting and breeding grounds.

- Landscape and visual (2.8) – give consideration to undergrounding where landscape and visual impacts will be particularly significant; avoid areas of high amenity value or scientific interest; choose the most direct route with no sharp changes in direction and fewer angle towers; choose tree and hill backgrounds; and where the land is flat and sparsely planted, keep high voltage lines as far as possible independent of smaller lines, converging routes, distribution poles and other masts, wires and cables.

- Noise and vibration (2.9) – give consideration to transmission line noise, including positioning and appropriately sized conductor arrangements.

5.19 Section 2.10 of EN-S deals with electric and magnetic fields. Paragraph 2.10.2 highlights that EMFs can have both direct and indirect effects on human health. Paragraph 2.10.3 states that to
prevent known effects the International Commission on Non-Ionizing Radiation Protection (ICNIRP) developed health protection guidelines in 1998 for both public and occupational exposure. Paragraph 2.10.4 goes on to state that the levels of EMFs produced by power lines in normal operation are usually considerably lower than the ICNIRP 1998 reference levels. The UK Government has since adopted the ICNIRP guidelines. The Government has also developed with the electricity industry a ‘Code of Practice, Power Lines: Demonstrating compliance with EMF public exposure guidelines – a voluntary Code of Practice’, published in February 2011 (paragraph 2.10.9) that specifies the evidence acceptable to show compliance with the ICNIRP terms.

5.20 Paragraph 2.10.15 sets out the factors that applicants should take into account, including the:

- height, position, insulation and protection (electrical or mechanical as appropriate) measures subject to ensuring compliance with the ‘Electricity Safety, Quality and Continuity Regulations 2002’;
- that optimal phasing of high voltage overhead power lines is introduced wherever possible and practicable in accordance with the Code of Practice to minimise the effects of EMFs; and
- any advice emerging from the Department of Health relating to Government policy for EMF exposure guidelines.

5.21 Paragraph 2.10.16 states that where EMF exposure is within the relevant public exposure guidelines, re-routing a proposed overhead line purely on the basis of EMF exposure, or undergrounding a line solely to further reduce the level of EMF exposure are unlikely to be proportionate mitigation measures.

**National Planning Policy Framework (NPPF)**

5.22 The NPPF came into effect in March 2012. It sets out the Government’s planning policies for England and how they are expected to be applied. The NPPF is a material consideration in planning decisions.

5.23 Paragraph 6 of the NPPF confirms that the purpose of the planning system is to contribute to the achievement of sustainable development. It goes on to state (paragraph 7) that there are three dimensions to sustainable development: economic, social and environmental. These give rise to the need for the planning system to perform a number of roles, including an economic role, contributing to building a strong, responsive and competitive economy through a number of means, including the provision of infrastructure.
5.24  Paragraph 17 sets out a number of 'core planning principles', including to:

- proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs; and

- to support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change, and encourage the reuse of existing resources, including the conversion of existing buildings, and encourage the use of renewable resources.

5.25  Paragraph 97 of the NPPF states that to help increase the use and supply of renewable and low carbon energy, local planning authorities should recognise the responsibility on all communities to contribute to energy generation from renewable and low carbon sources.

Planning Practice Guidance

5.26  In March 2014 the Department for Communities and Local Government (DCLG) established its Planning Practice Guidance ('PPG') web resource. The PPG covers a wide range of planning topics, including air quality; climate change; conserving and enhancing the historic environment; consultation and pre-decision matters; design; environmental impact assessment; flood risk and coastal change; health and wellbeing; land affected by contamination; land stability; light pollution; natural environment; noise; planning obligations; renewable and low carbon energy; travel plans, transport assessments and statements in decision making; use of planning conditions; waste; and water supply, wastewater and water quality.

Local Development Plan Policy

5.27  The local development plan for North Lincolnshire comprises the following documents:

- the North Lincolnshire Local Development Framework Core Strategy (adopted June 2011);

- the North Lincolnshire Housing & Employment Allocations Development Plan Document (adopted March 2016);

- the Lincolnshire Lakes Area Action Plan (adopted May 2011) covering the area between the western edge of Scunthorpe and the River Trent; and

- the ‘saved’ policies of the North Lincolnshire Local Plan (adopted May 2003).

5.28  The North Lincolnshire Local Development Framework Core Strategy sets out the spatial vision for North Lincolnshire regarding sustainable socio-economic development until 2026. The Core
Strategy looks favourably on growth in the region, including the securing of additional and retention of existing employment. In particular, paragraph 11.22 notes that:

"...existing energy generation sites such as Keadby Power Station are supported...

It is expected that existing power stations in North Lincolnshire will continue to play an important role in energy production and will continue to be a major contributor to North Lincolnshire's power generation supply to the national grid."

5.29 The Core Strategy recognises the opportunity that exists at the Keadby site with its connection to the National Grid, stating that the site is an area of "...significant opportunity for extra electricity generation...".

5.30 Paragraph 16.16 of the Core Strategy endorses infrastructure provision stating that it "...essential for sustainable development..." and goes on to stress that it is "vital that appropriate infrastructure is provided both to support new development and... to remedy existing deficiencies".

5.31 Policy DS17 ‘Overhead Power Lines and High Powered Electrical Installations’ of the North Lincolnshire Local Plan is of particular relevance to the proposed overhead line works. It states that the Council will seek to minimise the environmental effects of proposals for overhead power lines of 132kV or above and will not support such development where it would have a detrimental effect on Special Protection Areas (SPAs), Special Areas for Conservation (SAC), Ramsar sites; Sites of Special Scientific Interest (SSSI) or other statutory nature conservation sites; conservation areas and buildings of historic or archaeological interest; and existing committed or allocated housing areas.

5.32 Policy DS17 goes on to state that:

“In view of the substantial practical, technical and cost disadvantages involved, it is only in exceptional circumstances that the Council will seek to have lines placed underground, where this is not damaging to sites of nature conservation value or archaeological importance. Careful line routing will usually be the most appropriate way to minimise the visual impact of high voltage power lines.”

5.33 As confirmed above, the proposed overhead lines will not pass through any sensitive areas, while the Keadby site is already characterised by power station buildings and structures and overhead lines. As such, there is no exceptional circumstance in amenity terms to justify routing the lines below ground.
6.0  PLANNING ASSESSMENT

6.1  This section provides the planning assessment of the proposed overhead line works having regard to relevant planning policy and other material considerations.

The need for the overhead line works

6.2  As confirmed in Section 1, the proposed overhead line works are required for Keadby II, a new combined cycle gas turbine power station of 820 MW, and will provide the necessary connections to allow it to export electricity to the National Grid.

6.3  Keadby I has an existing connection to the National Grid by means of two separate overhead lines and associated transmission towers, which connect with the main Keadby 400 kV NG substation to the west. The presence of these existing overhead lines constrains the ability for Keadby II to connect to this substation, hence the submission of the section 37 applications that seek consent for the proposed overhead line works.

6.4  The 'need' that exists for new gas-fired generating stations, such as Keadby II, is clearly set out within EN-1. Notably, paragraph 3.1.3 of EN-1 states that the SoS should:

"...assess applications... for the types of infrastructure covered by the energy NPSs on the basis that the Government has demonstrated that there is a need for those types of infrastructure and that the scale and urgency of that need is as described for each of them..."

6.5  Paragraph 3.1.4 goes on to state that the SoS should give substantial weight to the contribution that all projects would make toward satisfying this need. As such, the need that exists for new energy infrastructure, such as Keadby II, is not open to debate or interpretation and is clearly confirmed by EN-1.

6.6  The need for Keadby II is examined in detail within the Planning Statement (Section 4) that forms part of the section 36C application for that development. The proposed overhead line works would support the delivery of this much needed electricity generating infrastructure, providing it with the necessary connections to the National Grid. This is in the national interest and in accordance with EN-1.

Consideration of alternatives

6.7  While there is no policy requirement to consider alternatives as the proposed works do not represent EIA development or affect European or nationally designated sites, consideration has been given to alternative means by which to connect Keadby II to the National Grid. This has included consideration of laying the electric lines below ground.
6.8 The laying of underground lines would remove the need to replace part of the existing Keadby I overhead line and install a new transmission tower. However, the laying of underground lines would require the excavation of a trench both within and outside the Keadby site, including underneath Chapel Lane. As there is a high level of existing surface and sub-surface infrastructure within and close to the site through which the lines would need to be routed, in particular within the vicinity of the substation boundary, this option was discounted. Overhead lines also remove the need to tunnel under Chapel Lane.

6.9 Further to the above, it was also considered that laying underground lines would have little benefit in landscape and visual terms, given that the Keadby site is not located within a sensitive area (e.g. SPA, SAC, SSSI, special landscape area or conservation area) and is already characterised by power station buildings and structures and numerous overhead lines and transmission towers.

Land use

6.10 The proposed overhead line works for the most part involve land that is within the control of KDL and National Grid. This land has historically been used for power generation; it was the location for the Keadby coal-fired power station from the 1950s to the 1980s and, more recently, following the decommissioning of the coal station, the Keadby I gas-fired power station. There are no sensitive land uses within or close to the site that would be affected by the proposed works.

6.11 Further to the above, the proposed works would not result in the loss of green field land, and any permanent land take would be minimal, confined to the base of the new transmission tower. Temporary working areas and access tracks will be required during the construction phase for the laydown of materials, storage of plant and also to enable the movement of these to the transmission tower location and conductor stringing location in order to prevent damage to the land or existing infrastructure. The land used during construction would be appropriately restored and all temporary access tracks removed.

Noise and vibration

6.12 In terms of noise and vibration effects, there are only a few residential properties located close to the proposed overhead line works. The nearest is approximately 130 metres to the north-east with another located approximately 300 metres to the south. The nearest settlement is Keadby Village, approximately 750 metres to the east. There are no designated nature conservation sites within the area of the proposed works or its immediate vicinity.

6.13 The construction stage will be for a limited duration (6-8 weeks) and construction work will be carried out as agreed with Environmental Health and in line the Control of Pollution Act 1974 with
the hours of work limited to 0700-1900 Monday to Friday and 0800-1600 on Saturday with no work on Sundays or Bank Holidays (this is in line with what is proposed for the Keadby II development). In addition, it is proposed that any piling activity will be limited to the hours of 0800-1800 Monday to Friday and 0800 to 1400 on Saturday. Furthermore, KDL will prepare and implement a Construction Environmental Management Plan (‘CEMP’) during the construction stage to limit noise and vibration and other construction effects. Therefore, it is not expected that there will be a significant impact on nearby receptors as a result of noise and vibration during construction.

6.14 EN-5 recommends that applicants proposing overhead lines give consideration to transmission line noise during operation, including positioning and appropriately sized conductor arrangements. The overhead line works will be undertaken in line with industry standards having regard to these considerations. Given that there are already overhead lines within the Keadby site, combined with the limited number of receptors within the immediate vicinity, it is not anticipated that significant effects will occur during operation.

Air Quality

6.15 The only emissions to air associated with the proposed works will be from vehicles accessing the Keadby site during the construction stage. However, given the limited extent of the works, combined with the fact that the construction stage will only be 6-8 weeks in duration; it is expected that any air quality effects will be negligible within the context of the overall Keadby site.

Ground conditions and contamination

6.16 Section 4.2 of the Environmental Information report (EIR) that forms part of the applications considers ground conditions and contamination, including the potential for contamination to water bodies and water courses. The EIR notes that previous site investigations within the Keadby site have identified elevated concentrations of some metals and that made ground at the site may contain industrial waste materials and pulverised fuel ash. However, the following is relevant to note:

- The ground works associated with the proposed works will be limited to the base of the new transmission tower, including some ground clearance and foundation work. This work falls within the area of current and historical power generation use and as such there would be no material changes to ground conditions or water bodies/courses.
• There is the potential for contaminated soil to be excavated from the works area for the new transmission tower therefore, prior to construction works, soil investigations will be carried out. Any contamination soils uncovered during these investigations or during construction works will be isolated, removed and disposed of appropriately. If necessary, consideration will be given to the use of alternative piling methods to prevent the spread of contamination.

• There are no water bodies or courses within the area of the proposed works. The closest water body is located approximately 300 metres to the south of the location of the works. Shallow groundwater is found within the Keadby site but will not be affected by the relatively small scale construction works involved.

• Measures will be employed during construction (implemented through a Construction Environmental Management Plan - CEMP) to ensure that pollutants are not released to land or water. There will be minimal use of materials that are potential contaminates during construction and the CEMP and adherence to Environment Agency guidance will ensure that no significant effects on land or water will occur.

Ecology

6.17 Ecology is dealt with at Section 4.3 of the EIR. The EIR reports that the ecological survey and assessment work carried out for the Keadby II section 36C application indicates that habitat within the area of the proposed works is made up of bare ground, semi-improved grassland, amenity grassland and small areas of scattered scrub. There are no designated sites within the area of the proposed works, although there is a non-designated site located approximately 250 metres to the south.

6.18 The scattered scrub within the construction works area, running alongside Chapel Lane, could provide foraging habitat for birds and bats. However, the extent of this habitat within the working area is limited, and similar habitat is widely available within the surrounding area. None of the other habitats within the area of the proposed works support protected species. Given the limited extent of construction works (largely confined to the area around the base of the new transmission tower) it is not anticipated that there will be any significant impacts upon ecology or habitats within the area of the proposed works or the Keadby site. Furthermore, the CEMP will incorporate measures to limit any impacts.

6.19 The closest statutory designated site to the area of the proposed works is the Humber Estuary SAC, Ramsar site and SSSI, approximately 800-1,000 metres at its nearest point, where part of the
tidal River Trent runs to the east of the Keadby site. The Humber Estuary is also designated as a SPA but the boundary of that designation is more than 10 kilometres from the Keadby site. The EIR notes that many of the qualifying features for the Humber Estuary are associated with coastal and estuarine habitats that are not present at the closest point to the site. Given the nature of the proposed works and the distance from designated sites, it is not expected that there will be any effects on such sites.

**Cultural heritage**

6.20 Cultural heritage is considered at Section 4.4 of the EIR. A desk based study was carried out for the Keadby II section 36C application, which identified potential for archaeological remains to survive in the area to the west of Chapel Lane, to the south and south-west of the area of the proposed works. No further areas of historic of cultural importance have been identified within the area that would be directly affected by the works. Given the historic use of the Keadby site and the proximity of the works to the Keadby I gas-fired power station and the National Grid substation, the area is already likely to have experienced significant ground disturbance.

6.21 The only ground works will be associated within the transmission tower and will involve either excavation or piling within a limited area. Prior to construction, site investigation work will be conducted within the ground works area that will include an archaeological watching brief. If evidence of buried archaeology is uncovered, work will be stopped while an appropriate plan for preservation or recording is prepared.

6.22 There are few heritage assets such as listed buildings within the vicinity of the proposed works. The works will not have a significant affect upon the setting of such assets on the basis that they will not be highly visible from the surrounding area, as they will be largely obscured by Keadby II, while the Keadby site is already characterised by power generation buildings and structures and existing overhead lines.

**Landscape and visual**

6.23 Landscape and visual effects are considered at Section 4.5 of the EIR. The Keadby site is not located within an area that is protected for its landscape value, such as an AONB or special landscape area. Furthermore, no landscape areas or features of high value have been identified within the vicinity of the Keadby site.

6.24 It is also relevant to note, as above, that the Keadby site is already characterised by power generation buildings and structure and overhead lines. The construction of Keadby II will add to this, while the proposed works will be largely obscured from the surrounding area by this
development. This is illustrated by Figures 4.4, 4.5 and 4.6 of the EIR that present photographs of existing views of the area of the proposed works, alongside photomontages of the view as it will appear with both Keadby II and the proposed works. These demonstrate that the Keadby site and surrounding area are not particularly sensitive to change in landscape and visual terms and that the proposed works will not result in significant landscape and visual effects.

**Flood risk**

6.25 The area of the proposed works is located within a zone of high flood risk (EIR, Section 4.10). Breach modelling conducted for the Keadby II section 36C application has indicated that the existing flood defences are adequate to control flooding at the Keadby site for a flood event from the River Trent. The site is also at residual risk from the Isle of Axholme inland drainage network. The North Lincolnshire Strategic Flood Risk Assessment states that the critical flood level for this area is 4.1 metres above ordnance datum.

6.26 The proposed works will have limited impact upon flood risk given that they comprise of one new transmission tower and sections of overhead electric line. The nature of the works means that there will be limited risk to them from flooding. If flooding were to occur, it is anticipated that this would flow around the base of the transmission tower with little impact on the structure and no contact with critical elements. Furthermore, the works will not require additional operational personnel to be at the site over and above those already present at the Keadby I Power Station and who would be present at Keadby II.

**Traffic and transport**

6.27 The construction traffic associated with the proposed works will be limited to the delivery of construction materials, plant and the movement of the construction workforce. Given that the nature of the works will be limited and their overall duration is only expected to be between 6-8 weeks, no significant construction effects are predicted in relation to traffic and transport. It is proposed that all construction traffic will access the Keadby site using the same route as is proposed for the Keadby II development; from the west using the dedicated access road from the A18. Ahead of construction work, KDL will prepare and implement a Construction Traffic Management Plan.

6.28 There will be no operational traffic associated with the proposed works, although there will be vehicle movements associated with periodic maintenance and inspection work. However, within the context of the operational traffic associated with Keadby I and Keadby II and the surrounding highway network this would be negligible.
Electric and magnetic fields

6.29 There are only a few residential properties located within the vicinity of the proposed overhead line works. The nearest is approximately 130 metres to the north-east with another located approximately 300 metres to the south. The nearest settlement is Keadby Village, approximately 750 metres to the east.

6.30 The proposed works involve the replacement of part of the existing Keadby I connection and a new Keadby II connection. The overall increase in overhead line, taking account of the section of the existing Keadby I line that will be removed, will be approximately 215 metres. The new sections of overhead line will be located within an area that is already crossed by overhead lines and will be constructed to industry standards taking account of the guidelines relating to electric and magnetic fields. These include the ‘Electricity Safety, Quality and Continuity Regulations 2002’ and the Government’s ‘Code of Practice: Optimum phasing of high voltage double circuit power lines’.

6.31 In view of the above, it is not considered that the proposed works will have any implications in terms of electric and magnetic fields.

Waste

6.32 There will be some waste generated during construction, such as excavated materials, packaging and off-cuts. There may also need to be the need to recycle or dispose of old cables. The relatively small quantities of waste generated during construction will be recycled or disposed of using standard waste management practices.

6.33 No solid wastes will be produced during operation.

6.34 No significant effects arising from waste management are expected to occur.

Cumulative effects

6.35 Section 4.12 of the EIR considers the cumulative effects of the proposed overhead line works with other developments, particularly the Keadby II development. This considers land and water; ecology; noise; air quality; cultural heritage; transport and travel; socio-economic characteristics; and landscape and visual amenity. It is not considered that any significant cumulative effects are likely to occur.

Mitigation and environmental management

6.36 As confirmed above, in advance of the construction stage, a CEMP will be prepared along with a Construction Traffic Management Plan. These plans will be employed during the construction
stage and their purpose will be to ensure that planned mitigation measures and best practice are implemented to manage and minimise potential environmental effects.

**Wayleaves**

6.37 KDL either controls the land required for the proposed overhead line works or has secured the requisite rights through agreements with the relevant landowners, in the event that there are any minor variations, rights can be procured from additional parties.

6.38 In terms of the crossing of the overhead lines over Chapel Lane initial contact has been made with the highway authority, which has confirmed licences will be required for the construction stage in relation to any scaffolding, netting and other protective measures required across the highway while the lines are being installed.
7.0 CONCLUSIONS

7.1 The following conclusions can be drawn from this Planning Statement:

- The proposed overhead electric line works will support the Keadby II development, providing the necessary connections to export the electricity it generates to the National Grid. The need that exists for new electricity generating capacity in the UK is confirmed by National Policy Statement EN-1.

- The proposed works will not affect land within any sensitive areas such as European sites, SSSI, National Parks, AONBs, special landscape areas or conservation areas. Nor will they infringe upon any designated heritage assets.

- KDL has given consideration to laying the electric lines below ground. This has been discounted given the disruption to existing surface and sub-surface infrastructure that would result, combined with the fact that the Keadby site is not located within any sensitive areas and is already characterised by power station buildings and structures, overhead lines and transmission towers.

- The Environmental Information Report demonstrates that the proposed works will not result in any significant environmental effects (including cumulative effects) and that any effects will be for the most part confined to the construction stage, which will only last for 6-8 weeks. During construction KDL will employ appropriate management and mitigation measures through a CEMP and a Construction Traffic Routing Plan.

- KDL has secured the necessary agreements to allow it to install the proposed overhead lines, in the event that there are any minor variations in route. Discussions will be progressed with the highway authority regarding the necessary licences to allow for the installation of the lines over Chapel Lane.

7.2 In summary, it is considered that the proposed works comply with relevant planning policy and are acceptable in planning terms and the Secretary of State is therefore requested to grant consent.
APPENDIX 1: TABLE OF RESPONSES FROM STATUTORY/NON-STATUTORY CONSULTEES
# Keadby I & II OHL Consultation Responses

<table>
<thead>
<tr>
<th>No.</th>
<th>Date</th>
<th>Organisation/Contact</th>
<th>Response Received</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.</td>
<td>17.05.16</td>
<td>HSE</td>
<td>I would like our response to be recorded as, No Comment.</td>
</tr>
<tr>
<td>2.</td>
<td>18.05.16</td>
<td>NATS</td>
<td>NATS anticipates no impact from this development as its nearest installations are over 20km away. As such we have no comments to make on the EIA and have no objections to the proposals.</td>
</tr>
<tr>
<td>3.</td>
<td>24.05.16</td>
<td>Met Office</td>
<td>Having looked at the information supplied, I can confirm that your Keadby II Site (NGR 482676 411646) is approximately 31.651Km from our nearest site. Which is our Weather Radar at Ingham. Our consultation zone around this site extends to a 20km radius and therefore we do not need to see any proposal which are located outside of this zone. So there are no concerns and no comments.</td>
</tr>
<tr>
<td>4.</td>
<td>02.06.16</td>
<td>Natural England</td>
<td>Thank you for consulting Natural England on the screening report for the proposed overhead lines. We do not consider that construction of the overhead lines is likely to have a significant effect on the Humber Estuary SPA, SAC and Ramsar site, due to the nature of the works and distance from the designated site. We therefore agree with the conclusion in Section 6.2 of the report.</td>
</tr>
<tr>
<td>5.</td>
<td>31.05.16</td>
<td>Historic England</td>
<td>Historic England advice re draft EIA Screening Report for Overhead Power lines at Keadby I and II.</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>As to the overhead power line arrangements and May 2016 Screening Report sent by you 17th May 2016 we are content that this does not throw up additional issues to those outlined in our letter of 14/04/16 in so far as there is a power station present already and the principle of the new station is already established, we do not see significant new visual issues and refer you to our archaeological advice in terms of an integrated approach which also includes the pylons.</td>
</tr>
<tr>
<td>6.</td>
<td>09.06.16</td>
<td>Environment Agency Annette Hewitson</td>
<td>Thank you for giving us the opportunity to comment on the proposed works, prior to your formal submission to the Secretary of State regarding the above. We have considered the contents of the Environmental Impact Assessment (EIA) Screening Report and I can confirm that we have no objection to the principle of the proposed works. Please find below some comments on the document for topics within our remit.</td>
</tr>
</tbody>
</table>
|     |          |                              | **Land Contamination**  
While we agree that the proposed construction itself is unlikely to release contamination (with appropriate control measures in place – as noted on page 30 under point 7) it is possible that the piling of land subject to contamination may cause concern. Previous investigations have identified that contamination may be present in areas of the site. This will require further consideration prior to piling, and may require investigation, remediation and alternative piling methods to be used. |
|     |          |                              | **Flood Risk**  
In respect of the contents of the report, we would suggest additional text (as underlined below) regarding flood risk to the site as follows:  
Page 35, (point 25) - The proposed development is located within a zone of high flood risk. Breach modelling conducted as part of the EIA for the Keadby II power station development has indicated that existing flood defences are adequate to control flooding at site for a flood event from the River Trent. The site is also at a residual flood risk from the Isle of Aholme inland drainage network. The North Lincolnshire Strategic Flood Risk Assessment states that the critical flood level for this area is 4.1m above ordnance datum.  
Pollution Prevention Page A-19 (Section A5.9) mentions Environment Agency Pollution Prevent Advice and Guidance notes (PPGs). A decision has been taken to no longer publish such advice and these have now been withdrawn from our website. The information and principles within the PPGs is still relevant and may be considered best practice; however, some of the specifics may now be outdated. |
| 7.  | 14.06.16 | National Grid                | I can confirm that National Grid have looked at the proposed overhead line layout and have no comments to make on the Screening Report. |
| 8.  | 15.06.16 | MOD                          | MOD Safeguarding – SITE OUTSIDE SAFEGUARDING AREA  
Proposal: Screening report in respect of proposed overhead power lines for the Keadby I and Keadby II power generating stations Location: Keadby, Lincolnshire Grid Ref: 482833, 411699 |
<table>
<thead>
<tr>
<th>No.</th>
<th>Date</th>
<th>Organisation/Contact</th>
<th>Response Received</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>Highways England</td>
<td>Thank you for consulting Defence Infrastructure Organisation (DIO) on the above screening report. This application relates to a site outside of Ministry of Defence safeguarding areas. I can therefore confirm that the Ministry of Defence has no safeguarding objections to this proposal. I trust this adequately explains our position on this matter.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>(Response prepared by CH2M)</td>
<td></td>
</tr>
<tr>
<td>9.</td>
<td>15.06.16</td>
<td>Highways England</td>
<td>1.0 Introduction This technical memorandum has been produced by CH2M on behalf of Highways England in order to provide comments on the ‘Screening Report in respect of Proposed Overhead Power Lines for the Keadby I and Keadby II Power Generating Stations at Keadby, Lancashire’ [the Screening Report] dated May 2016. The Keadby site is located north of the Sheffield and South Yorkshire Navigation Canal, within the village of Keadby. It is located circa 5.5km to the north-east of the first point of contact with the Strategic Road Network (SRN) which is the M180 Junction 2. The Keadby I power plant is currently operational.</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>2.0 Power Lines The Screening Report has been produced by ERM in relation to the presence of existing overhead lines which currently constrain the ability for the proposed Keadby II site to connect to the substation. In order to overcome this constraint the existing Keadby I connection with the substation will be replaced by a new overhead line to a new tower. The new tower is located approximately 95 metres to the east of the existing tower, and the approximate length of the replacement line will be 285 metres. A new overhead line will also be installed, running from the Keadby II site to the existing transmission tower which is currently used for the existing Keadby I connection. The approximate length of the new line will be 240 metres. It is assumed, though it should be confirmed, that the update to the power lines is a separate planning application to that of Keadby II.</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>3.0 Keadby II From the perspective of Highways England, the contents of the Screening Report should be considered in the context of the Keadby II application. In early May 2016, prior to the receipt of this Screening Report, CH2M provided comment upon the suitability of the Transport Assessment (TA) prepared by Mayer Brown in support of an application to vary the consent with regards to the Keadby II power station. Keadby Developments Limited intends to pursue construction of a combined cycle gas turbine generating station. The review of the TA with regards to Keadby II power station highlighted the need for further information, particularly the requirement to provide a comparison between the consented baseline and the revised proposals. No concerns were raised with regards to the operational phase, though comments were made with regards to the construction phase. It was deemed that the issues identified could be addressed by way of a Construction Management Plan. It was advised that Highways England offer no objection to the application providing that it is conditioned that the scope and content of the Construction Traffic Management Plan are agreed in consultation with Highways England, and that all issues raised are resolved by the document.</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>4.0 Construction Activities In terms of traffic generated by the powerlines application, the only impact is anticipated at the construction phase. It is stated within the Screening Report that the construction traffic associated with the overhead lines is unlikely to result in significant cumulative effects with the Keadby II power station scheme and the Lincolnshire Lakes scheme. However, no further information is provided. Highways England should request further information with regards to: • Construction timetables; • Construction trip generation; • Vehicle types; • Construction worker trip generation; and • Trip distribution. If the impacts are anticipated to coincide at any point with the Keadby II development, be it only for a short period of time, the implications of this should be considered and presented.</td>
</tr>
</tbody>
</table>
5.0 Outline Construction Environmental Management Plan

An Outline Construction Environmental Management Plan [CEMP] has been provided with the Screening Report. The outline CEMP contains a strategic level of detail and is in draft form. It will continue to be developed as the proposed development proceeds through the detailed design and construction phases, in consultation with relevant bodies. The CEMP will reflect any conditions, requirements and obligations contained in the consent. Of relevance and welcomed by Highways England are the following points:

- Preferred routes for HGVs to the sites will be identified and agreed with the local highway authorities.
- It is accepted by Highways England that the most appropriate routing to the site is likely to be via the SRN. In order to facilitate this, the required processed for abnormal load movements should be followed. Contractors will be required to make the abnormal load movement application at the appropriate time post consent to agree routing and specific vehicles to be used.
  - All HGV movements will be confined to a designated operational period, during day time hours; the precise hours will be agreed with the highway authority;
  - This approach is welcomed by Highways England. HGV movements should be outside of the network peak hours on the SRN.
  - All contractors and sub-contractors will be encouraged (using incentives if necessary) to employ car sharing schemes and the use of minibuses, in an attempt to minimise the volume of worker related traffic generated by the sites, where this is feasible. This approach is again welcomed by Highways England.

6.0 Summary

This technical memorandum has been produced in order to provide comments on the ‘Screening Report in respect of Proposed Overhead Power Lines for the Keadby I and Keadby II Power Generating Stations at Keadby, Lancashire’ [the Screening Report] dated May 2016.

The Screening Report has been produced in relation to the presence of existing overhead lines which currently constrain the ability for the proposed Keadby II site to connect to the substation. In order to overcome this constraint the existing Keadby I connection with the substation will be replaced by a new overhead line to a new tower. A new overhead line will also be installed, running from the Keadby II site to the existing transmission tower which is currently used for the existing Keadby I connection.

In terms of traffic, the only impact is anticipated at the construction phase. It is stated within the Screening Report that the construction traffic associated with the overhead lines is unlikely to result in significant cumulative effects with the Keadby II power station scheme and the Lincolnshire Lakes scheme. However, no further information is provided. Highways England should request further information with regards to:

• Construction timetables;
• Construction trip generation and vehicle types;
• Construction worker trip generation; and
• Distribution.

If the impacts are anticipated to coincide at any point, be it only for a short period, the impacts of this should be considered and presented.
APPENDIX 2: COPY OF LETTER TO RESIDENTS AND EXHIBITION MATERIALS
Dear Resident,

As you may be aware, SSE was given consent for the development of a second Combined Cycle Gas Turbine (CCGT) electricity generating station in 1993, known as Keadby 2. Plans are to build Keadby 2 on land adjacent to the existing Keadby 1 power station. Further project details can be viewed at www.sse.com/keadby2.

Once Keadby 2 is constructed it will need to be connected to the electricity transmission network via the existing National Grid substation, which is located to the north-west of the existing Keadby 1 power station.

SSE is therefore proposing works to one of the existing overhead electric lines in addition to the installation of a new line to ensure that Keadby 2 can export electricity to the transmission network.

Before it can carry out these works SSE will need to apply to the Secretary of State for the Department of Energy and Climate Change (DECC) for consent.

In advance of submitting the applications to DECC, SSE wishes to provide you with the opportunity to review and comment upon the proposed works.

You are invited to attend the following exhibitions on 9 and 10 June 2016:

- **St Oswalda Hall Keadby** - Thursday 9th June 2016 between 6 and 8pm
- **Ealand Victory Hall** - Friday 10th June between 10am and 1pm

Further information regarding the proposed works and the Keadby 2 project will be available during the events. Members of the project team will be on hand to answer any questions you may have. Feedback forms will also be available.

Information on the works can also be viewed at www.sse.com/keadby2 and at the following public locations from 23 May 2016:

- Scunthorpe Civic Centre
- North Lincolnshire Council
- Civic Centre
- Ashby Road
- North Lincolnshire
- DN16 1AB
Opening hours: Monday/Tuesday/Thursday 9.00 am-5.00 pm, Wednesday 9.00 am-5.00 pm, Friday 9.00 am-4.30 pm.

Crowle Community Hub
52-54 High St. Scunthorpe,
South Humberside,
DN17 4LB

Opening hours: Mondays, Wednesdays and Fridays 9am – 4pm.

Any comments and feedback forms should be returned to the following address no later than 8th July 2016:

Jade Fearon
SSE
Keadby Power Station
Trentside
Keadby
SCUNTHORPE
DN17 3EF

Yours faithfully

Jade Fearon

Liaison Manager
Proposed Replacement and New Overhead Electric Lines

SSE is proposing to construct a new gas-fired power station (Keadby 2) to the west of the existing Keadby 1 Power Station.

It will be necessary to carry out overhead electric line works to connect Keadby 2 to the electricity transmission system. The proposed works would involve the partial replacement and diversion of an existing electric line and a new line and transmission tower. The location of the works is shown on the plan below.
There are already a number of overhead electric lines in this location. The replacement line would be approximately 285 metres in length and the new line 240 metres in length. The new transmission tower would be of steel lattice construction and around 44 metres in height. The images below illustrate how the overhead lines would appear.

It is anticipated that the electric line works would take place during the construction of Keadby 2:

- The construction hours would be the same as for Keadby 2 - 7am to 7pm Monday to Friday & 8am to 4pm on Saturday;
- Noisy activities such as piling would only take place 7am to 6pm Monday to Friday and 8am to 2pm on Saturday;
- Access for construction vehicles will be via the North Pilkrey Bridge from the A18
- The works would take 6 to 8 weeks to complete.

SSE is intending to submit applications for the electric line works to the Department for Energy and Climate Change later this year.

We would welcome any comments or questions you have on the above proposed works. Further information is available at www.sse.com/keadby2
Your ref: 2941C
Our ref: s37 screening Keadby I and II

1 August 2016

Dear Mr Bullock,

RE: THE ELECTRICITY WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (ENGLAND AND WALES) REGULATIONS 2000

REQUEST FOR TWO SCREENING OPINIONS BY THE SECRETARY OF STATE ON PROPOSED REPLACEMENT AND NEW OVERHEAD ELECTRIC LINES – KEADBY I AND II POWER STATIONS, KEADBY, SCUNTHORPE, NORTH LINCOLNSHIRE DN17 5EF

Thank you for your letter of 23 June 2016 on behalf of your client, Keadby Developments Ltd, that requested two screening opinions by the Secretary of State on the proposed installation of two small sections of overhead electric line that would require Section 37 consent under the Electricity Act 1989 and are subject to the Electricity Works (Environmental Impact Assessment) (England and Wales) Regulations 2000 ("the EIA Regulations"). This response covers both requests.

The Secretary of State has considered the information within the supplied documents and has also consulted with the local planning authority, North Lincolnshire Council. The following factors have been taken into account by the Secretary of State in reaching his decision:

- The proposed works do not fall within Schedule 1 (mandatory EIA) as the two overhead lines are below the threshold of 15 km in length;

- The proposed electric lines fall under Schedule 2 (consideration on a case-by-case basis) of the EIA Regulations as the voltage is more than 132kV and are below the threshold of 2 km in length;

- The proposed electric lines do not pass within any "sensitive areas" as defined in the regulations including but not limited to: Sites of Special Scientific Interest (SSSIs), European sites, National Parks, the Broads and Areas of Outstanding Natural Beauty, World Heritage Sites or Scheduled Monuments; and

- There will be no likely significant effects from the proposed works alone or cumulatively, during their construction and operation (this view is also shared by North Lincolnshire Council).
Taking account of the above mentioned factors, the Secretary of State concludes that the documents provided to the Secretary of State with your letter of 23 June 2016 are sufficient, and can confirm that the proposed replacement and new overhead lines do not require a statutory EIA as they are unlikely to have significant effects on the environment due to their nature, location and size.

A copy of this letter is sent to Shaun Robson at North Lincolnshire Council for information.

Yours sincerely,

Denise Libretto  
Head of Networks  
Energy Infrastructure Planning