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**UNIPER UK LTD**

# EMERGENCY AUXILIARY POWER GAS RECIPROCATING ENGINES FACILITY

## SUPPORTING STATEMENT FOR A FULL PLANNING APPLICATION

**For Land at**

**KILLINGHOLME POWER STATION,**
**CHASE HILL ROAD**,
**KILLINGHOLME**,
**DN40 3LU**

UTG/20/PMP/309/R

# SUPPORTING STATEMENT FOR A FULL PLANNING APPLICATION-

# KILLINGHOLME POWER STATION EMERGENCY AUXILIARY POWER GAS RECIPROCATING ENGINES FACILITY

**November 2020**

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## Abbreviations/Nomenclature

| | |
|---|---|
| BAT | Best Available Techniques |
| BGS | British Geological Survey |
| BREF | Best Available Techniques Reference Document |
| $CO_2$ | Carbon dioxide |
| EA | Environment Agency |
| EAP | Emergency Auxiliary Power |
| GRE | Gas Reciprocating Engine |
| LCP | Large Combustion Plant |
| LWS | Local Wildlife Site |
| NG | National Grid |
| NPPF | National Planning Policy Framework |
| NSR | Noise Sensitive Receptor |
| OCGT | Open Cycle Gas Turbine |
| SAC | Special Area of Conservation |
| SPA | Special Protection Area |

| | |
|---|---|
| SPZ | Source Protection Zones |
| SSSI | Site of Special Scientific Interest |

# 1 INTRODUCTION

## 1.1 General

1.1.1 This Supporting Statement provides information regarding the proposal for a Gas Reciprocating Engines (GREs) Emergency Auxiliary Power Facility on land at the Killingholme power station site, Chase Hill Road, North Killingholme (Figure 2 and Figure 4). Killingholme Power Station comprises four Open Cycle Gas Turbines (OCGTs).

1.1.2 In general, all power stations need an electrical supply to start up: under normal operation this supply would come from the transmission or distribution system; under emergency conditions Emergency Auxiliary Power (EAP) stations receive this electrical supply from small auxiliary generating plant located on-site.

1.1.3 The likelihood of a total or partial system shut-down occurring is considered remote. However, it is necessary that should a total or partial shut-down occur anywhere on the transmission system, that arrangements must be in place to enable a timely and orderly restoration of supplies.

1.1.4 The intention is that the EAP facility will be unmanned, operating completely independently of the existing station and providing auxiliary emergency power. The EAP facility will contribute to reinforcement measures necessary for the stability of UK electricity generation arising from the closure of fossil-fired power stations, that traditionally provided emergency auxiliary power capability for the grid. Inevitably, the increaseding use of weather related renewable energy generation increases the risk of full or partial blackout episodes on the grid. A rapid and dependable support response is essential as a prevention and restoration mechanism to maintain energy supply and security.

## 1.2 The Applicant

1.2.1 Uniper is an experienced leading international energy company with activities in more than 40 countries with around 12,000 employees globally. Uniper's main activities include the secure provision of power generation in Europe and Russia, global energy trading, transportation, storage and specialist power engineering services. Uniper is the fifth largest generator in the UK, owning seven power stations comprising over 6 gigawatts (GW) of flexible installed capacity, as well as Holford gas storage site.

1.2.2 Uniper is a well-established business whose employees, experience and assets make an important contribution to Britain's security of energy supply and to the cost-effective transition to a low carbon society.

## 1.3 Planning Application

1.3.1 The planning application is for full planning permission to construct a GRE Emergency Auxiliary Power Facility and contains the following documents:

- Completed planning application forms
- Supporting Statement
- Air Quality Assessment
- Noise Assessment
- Best Available Technique Statement

- Supporting plans, indicative design and elevation drawings

## 1.4 The Proposal

1.4.1 It is proposed that a GRE Emergency Auxiliary Power Facility is installed within the Uniper land ownership and consented operational boundary of Killingholme Power Station. The facility will be installed in a purpose built compound located immediately east of the Gas Turbine Building and bypass ducts (Figure 4). The EAP facility will comprise the following elements:

- Seven gas-fired reciprocating engines each placed in a bunded acoustic container,
- Exhausts rising from the top of each of the main containers 8.16 m in height
- An electrical container holding the site control and communication equipment (Control Room and Switchgear)
- Gas pressure management infrastructure and metering
- Lighting to the fixed containers
- Ancillary infrastructure, including cabling and trenching, concrete plinths, bases and security fencing.

1.4.2 Information on the list above is provided in more detail in Section 2 and the elements listed are referred to collectively in this document as the 'proposed development'.

1.4.3 The development is intended to be unmanned, providing auxiliary power to Killingholme power station and operated independently of the existing power station.

## 1.5 The Site

1.5.1 Uniper UK Limited (UUKL) own approximately 141,377 $m^2$ of land at Killingholme Power Station. The proposed development site subject to this planning application is 646 $m^2$. The site is a gravelled area of land neighbouring the Gas Turbine House and bypass ducts. The site is level and bordered to the west by large scale buildings associated with the existing power station, to the east by amenity grassed areas and Chase Hill Wood. North of the site is hardstanding, the power station 400KV generator transformers, National Grid Compound and Hornsea 400KV substation. South of the site are areas of hardstanding and the power station Control Building. The nearest residential property to the proposed development site is Fairfields on Brick Lane, located over 780m west southwest of the application area.

1.5.2 The proposed development site lies over 1km east of East Halton, 1.5km north east of North Killingholme, and approximately 1.7km west of the southern bank of the River Humber. It is located in North Lincolnshire District and North Killingholme Parish. It is centred on National Grid Reference TA 15407 19014. The proposed development site is located in a largely industrial area.

**Photo 1: Proposed Development Site viewing Southwest**

1.5.3 The National Grid Substation and Honsea Offshore Windfarm Onshore Substation are located to the northwest. To the south of the site beyond the power station buildings is Chase Hill Road which runs east to west, beyond which are the Total Lindsey Oil Refinery and the Philips 66 Humber Refinery.

1.5.4 Vehicular access is located on Chase Hill Road. From the main power station access on Chase Hill Road vehicles will travel north via existing internal site roads to the development site. Chase Hill Road is a single carriageway road that leads to Rosper Road which provides access to the refineries and sites along the Humber. The local road network is continually in use by Heavy Goods Vehicles (HGVs) accessing the various industrial sites locally. There are no public rights of way within or adjacent to the application area.

## 1.6 Planning History of the Application Area

| Permission Reference | Description | Decision |
|---|---|---|
| CIRC/1989/0169 | Powergen combined cycle gas turbine power station | Conditional permission 31 January 1990 |

| | | |
|---|---|---|
| 7/1990/0548 | Erect a gas receiving facility including metering filtering heating and pressure reducing equipment and delivery to the Killingholme power station. | Conditional permission |
| PA/2000/0071 | Planning permission to erect a single storey office and workshop | |
| PA/2009/1140 | Planning permission to erect a storage building | Conditional permission 3 November 2009 |
| PA/2016/512 | Application for the determination of the requirement for prior approval for the demolition of Killingholme Gas Fired Power Station | Conditional approval 29 June 2016 |
| PA/2016/1240 | Construction of a compound with 14 (number) gas reciprocating engine generators, step up transformers, security fencing, other ancillary structures and associated works | Conditional approval 10 October 2016 |
| PA/SCO/2017/3 | Scoping opinion for VPI-Immingham Energy Park 'A' Power Station | Not determined |
| PA/2020/935 | Lawful development certificate for a synchronous compensator | Granted |

1.6.1 Planning permission PA/2016/1240 was granted in 2016 for a development involving 14 GREs acting as standing reserve power plant and located west of the Boiler House building. Planning consent was subject to a standard 3 year implementation date. The implementation date expired on the 10th October 2019 without commencement of construction.

## 1.7 Environmental Impact Assessment Screening

1.7.1 Schedule 1 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (“the EIA Regulations”) identifies projects for which an EIA is mandatory. For energy development it is “thermal power stations and other combustion installations with a heat output of 300 megawatts or more”. The proposed development does not fall under Schedule 1 of the regulations, therefore an EIA is not mandatory.

1.7.2 A Schedule 2 development is defined in the EIA Regulations as development, other than exempt development, of a description mentioned in Column 1 of the table in Schedule 2 where:

- Any part of the development is to be carried out in a sensitive area.
- Any applicable threshold or criterion in the corresponding part of Column 2 of that table is respectively exceeded or met in relation to that development.

1.7.3 In Schedule 2, Section 3 Energy Industry (a) Industrial installations for the production of electricity, steam and hot water (unless included in Schedule 1) the applicable threshold for Schedule 2 development is the area of the development exceeds 0.5ha.

The site area is below 0.5ha, hence is not schedule 2 development. The development is unlikely to give rise to significant environmental impacts, due to its scale, presence on an existing industrial site and distance from residential and ecological receptors. It is concluded that an EIA of the development is not necessary. Environmental information regarding noise and air quality has been provided with the planning application to support this conclusion.

## 2 THE PROPOSED DEVELOPMENT

2.1.1 The application is for construction and operation of a compound with 7 (number) GRE generators, security fencing, other ancillary structures and associated works to act as EAP in recovery from a total or partial shutdown of the electricity transmission system which has caused extensive or total loss of supply.

2.1.2 A site screening assessment was undertaken of Uniper owned sites to identify those suitable to accommodate EAP plant. Considerations such as availability of vacant land, impact on current site operations/use, suitable ground conditions, proximity to residential properties and sites of ecological importance/habitats, proximity to a gas supply, electrical connection and compliance requirements for National Grid were all taken into account as part of the screening assessment. The Killingholme site was identified as a suitable location for the proposed development because:

- There is excellent existing road access to the site and internally to the development plot.
- The site is already under industrial use.
- It is located close to existing gas supply and electrical connection (thereby minimising transmission losses).
- The plot is clear of structures and substantial vegetation.
- The nearest residential neighbour is 780m from the site.
- There are no local ecologically sensitive areas that could be affected by the installation and operation of the development.

2.1.3 The GREs proposed are an operationally tried and tested, safe technology. When designing the site layout, consideration has also been given to construction and health and safety, bearing in mind the existence of the existing station and the presence of a gas supply line.

### 2.2 Use

2.2.1 The internal layout of the site has been determined with input from Siemens. The layout provided in Figure 5 is considered to be highly representative of the plant that will be installed. The EAP facility can be started quickly to respond rapidly to instructions provided by NG. The equipment will be connected to a Control Room and Switchgear Building. Mains gas will be supplied to the site via the on-site gas facility, which in turn will be connected to the national gas transmission system.

The proposed development will consist of the following items:

- Seven gas reciprocating engines placed in individual containers (similar to shipping containers) measuring 12.2m in length, 2.4m wide and 4.5m in height.
- Exhausts rising from the top of each container to a total height of 7.56m above ground level.
- An electrical container (similar to shipping containers) housing the site electrical apparatus, control and communication equipment 13m in length, 3m in width and 2.8m in height.
- Diesel generator
- Lighting fixed to the containers.

- Ancillary infrastructure including cabling, trenching for services, concrete plinths/bases, fencing and storage area.

In exception to an EAP event, it is estimated that the diesel generator will be operated once a week for 30 minutes and the GRE's operated 1.5 hours per month for maintenenace to ensure operational reliability.

## 2.3 Layout

2.3.1 The proposed arrangement of the development in the compound is shown on Figure 5. The items will be located on individual concrete foundation bases/plinths to ensure stability of the plant and spread the loads evenly. The bases/plinths will be approximately 300mm thick and sit on the existing ground surface. The existing power station internal access road will pass the eastern and northern boundary of the facility. A security fence and gates will be located on the boundary of the facility comprising 2.4m high security palisade fencing.

## 2.4 Access and Traffic

2.4.1 Local road access to the site is from Chase Hill Road, from the existing Killingholme Power Station access. The site is very well connected to the strategic highway network.

2.4.2 During the construction period there will typically be up to 2 HGV movements per day except on days when the reciprocating engine equipment is delivered to site when there will be approximately 5 HGV movements. It is expected that the main plant will be delivered over a maximum period of five weeks.

2.4.3 Once operational, technical personnel will visit the compound to carry out routine maintenance and repairs. There will be approximately 1 visit per week of light vehicles for delivery of parts and attendance to site by technicians. Ample parking will be provided immediately east of the compound on a gravelled area and the side road north of the compound. Furthermore, dedicated parking is provided at various areas of the power station site. It is considered that the impact of the proposed development on the local transport network will be minimal. Therefore no further assessment of traffic impacts is considered to be required.

## 2.5 Operation and hours of construction

2.5.1 The availability of auxiliary power to Killingholme power station from the GREs will be 24 hours, 7 days per week, to provide appropriate cover for a National Grid instruction for a EAP event. The likelihood of EAP is low. Other than the necessary commissioning and testing activities, once the EAP Facility is electrically configured for starting, periodic testing would be the only additional operational requirements, which according to Grid Code would be conducted no more than once every three years. Uniper would also undertake testing amounting to less than 48 hours per year. Principally, the operational hours of the GREs will be dictated by demand from National Grid and partial or full losses to the electricity network.

2.5.2 The EAP unit electrical system will provide services to enable auxiliary power supply to Killingholme Power Station, which will then provide power to be resynchronised to the grid supplies once the EAP condition is finished.

2.5.3 The EAP facility will provide auxiliary power to Killingholme Power Station and will not be used as separate additional power generation. It is emphasised that the

development is intended to enable EAP capability (auxiliary start-up power) only to enable rapid restoration response to energy provision and for wider national security motives. The EAP unit will not be used as a separate power station to supplement Killingholme power station generating capacity.

2.5.4 The overall construction programme will be up to 4 months, with construction generally between the hours of 07.00 to 19.00 Monday to Friday and 08.00 to 17.00 on Saturday.

## 2.6 Employment

2.6.1 During the site establishment and construction phases of the development, the number of people on the site will vary between 5 and 15. Where possible, local civil engineering companies will be used to undertake the construction of the development, with purchasing of local construction materials. Once operational there will be no staff based at the site, although it is anticipated that the facility could generate employment for up to two engineers. The local economy will benefit from the Business Rates payable on the operational development.

# 3 ENERGY POLICY

## 3.1 The Importance of Emergency Auxiliary Power Facilities

3.1.1 The electricity industry in the UK is undergoing a profound structural change in response to the Climate Change Act 2008 (as amended in 2019) ("the Climate Change Act") and Carbon dioxode ($CO_2$) emission targets, as most recently reiterated in the Clean Growth Strategy. The Climate Change Act commits the UK government to reducing greenhouse gas emissions by 100% of 1990 levels (i.e. to net zero) by 2050. This is driving the rapidly increasing development of renewable energy capacity, as well as the decline and eventual cessation of electricity generation using unabated coal by 2025. The increased market penetration of renewables, particularly wind energy with capacity set to continue to increase over the next decade, is further displacing fossil fuel-based energy generation. In addition, the strategic decision to invest in new nuclear power will contribute to the move away from fossil fuel combustion for power.

3.1.2 Renewable energy generation such as wind and solar is weather dependent and recognised as providing intermittent energy supplies to the grid. Inevitably, weather related renewable energy generation increases the risk of full or partial blackout episodes on the grid. A rapid and dependable support response is essential as a prevention and restoration mechanism to maintain energy supply and security.

3.1.3 The continued changes in the generation mix of the UK (See Chart 1) have placed even more emphasis on the need to ensure security of supply and the transition to low carbon renewable energy sources, hence the prominence of the capacity market.

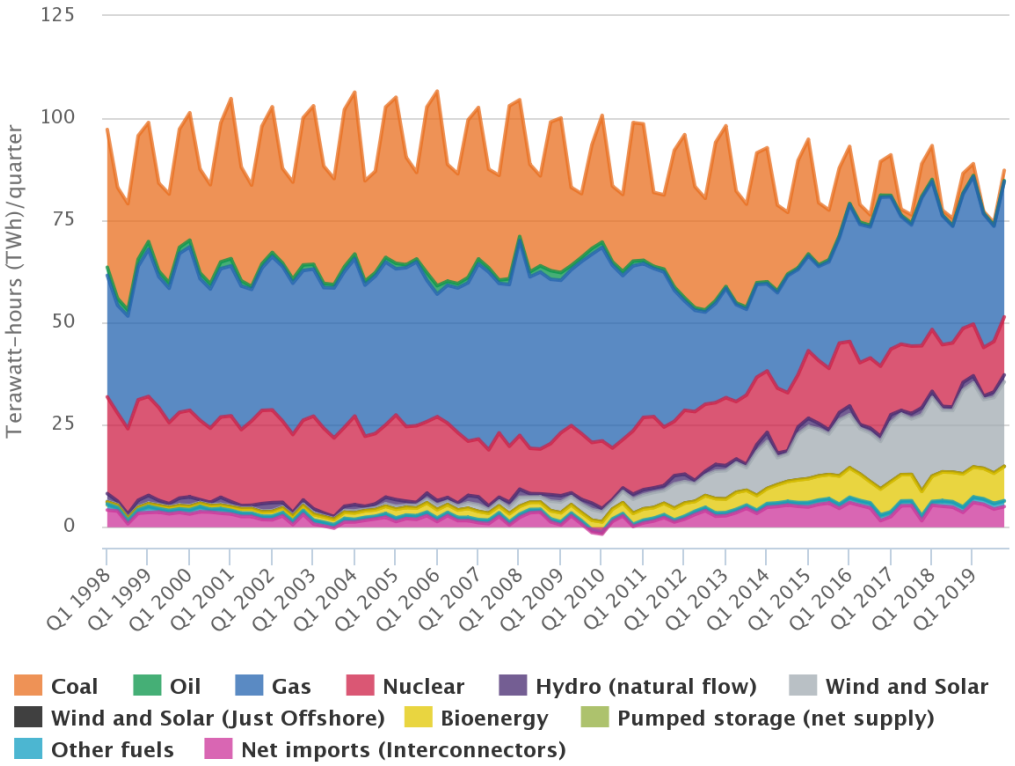


**Chart 1: GB Electricity Generation Mix by Quarter and Fuel Source (Ofgem)**

National Grid, the operator of the UK electricity transmission network, maintains the energy network through managing supply and demand on a second-by-second basis. This is essential to maintaining security of supply, energy provision and the grid frequency within set limits used by all our electrical equipment. Failure to keep within these limits contributes to network trip or blackout in order to protect our electricals from damage or failure.

3.1.4 The Department for Business, Energy and Industrial Strategy (BEIS) sets out the Government's strategy for Electricity Market Reform (EMR). It states that the reformed energy market will deliver:

- low carbon energy;
- reliable energy supplies; and
- minimised costs to consumers.

3.1.5 Uniper as an energy generator can undertake an important role with its mixture of power and gas assets, as summarised below:

- Climate protection must go hand-in-hand with security of supply.
- While new technologies scale up and renewables expand, Uniper can provide the insurance policy that keeps the lights on.
- Uniper offers generation and storage facilities, providing constant and reliable power during the energy transition.

3.1.6 The proposed development is nationally important and necessary to assist in meeting the Government's objective of maintaining a reliable electricity supply and to compliment the mix of electricity generation in the UK.

3.1.7 Natural gas-fired generation is seen by many including Uniper as a bridging technology and back up energy provider, allowing the UK to fully transition into a low carbon economy. This is because gas fired power stations provide the necessary rapid response, supporting baseload in times of substandard low weather related supplies and/or high energy demand. In order to support change to a low-carbon emission energy system, gas plant reliability and availability is paramount. An EAP facility at Killingholme power station will allow more low carbon energy adoption by providing a reliable restoration service to handle any increased risk of blackouts associated with the increase in intermittent renewable energy supplies to the grid.

3.1.8 Small scale GRE technology is efficient and responsive, able to generate power at very short notice. The high response capability means that the EAP facility will be capable of operation at full power within minutes of start-up, and completely power-down after demand for auxiliary power is no longer required. Hence, the proposed development would serve as an enabler for auxiliary back up power to support intermittent renewable energy generation and the transition to a low-carbon economy. Such services are necessary to deal with plant unavailability and to maintain a reliable energy network.

# 4 PLANNING POLICY

## 4.1 Introduction

4.1.1 The purpose of this Planning Statement is to describe the proposed development, and to consider the extent to which it complies with relevant planning policies, including national and local plans. Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that:

*"...determination must be made in accordance with the [development] plan unless material considerations indicate otherwise"*,

the development plan in this case being:

- The North Lincolnshire Core Strategy (Adopted June 2011);
- The saved policies of the North Lincolnshire Local Plan (Adopted May 2003); and
- Housing & Employment Land Allocations Development Plan Document (Adopted March 2016).

## 4.2 The North Lincolnshire Core Strategy (Adopted June 2011)

4.2.1 The Core Strategy, adopted in June 2011, provides a long term vision for North Lincolnshire and provides a blueprint for managing growth and development in the area up to 2026. Policy CS1 – Spatial Strategy for North Lincolnshire. The spatial vision provides for the future development requirements within the District, with a strong emphasis on employment provision.

4.2.2 Policy CS2 – Delivering More Sustainable Development has an objective to focus development on previously developed land in the first instance, with specific reference to the aim of focusing new development on brownfield sites within the defined development limits. Policy CS3 – Development Limits seeks to focus development within the defined Development Limits and strictly control development outside of those limits. The proposed development is located adjacent to the development limits for South Humber Bank as defined on Inset map 57 Housing & Employment Land Allocations DPD. It is located on previously developed land on an existing industrial site, which for the last 25 years has been established as suitable for energy generation. The small scale proposal is in keeping generally with the industrial nature of the area and due to the proximity to gas supply and power station connection will minimise the ground works necessary for connections thereby representing sustainable development. Policy CS2 also seeks to ensure that all new development is sustainable.

4.2.3 The remaining parts of this section identifiy the policies relevant to the proposed development.

4.2.4 Policy CS5 seeks to ensure that all new development within the district is of a high quality and accessible design which respects its local context. Design of the proposed development is provided in Section 2 of this document. The small scale development is in keeping with the industrial nature of the site and consistent with the small scale structures that have historically been located on the power station site. The site is located adjacent to a large scale power station and National Grid buildings and in the vicinity of the refinery to the south which provides the context for any views into the site.

4.2.5 Policy CS6 seeks to protect, conserve and enhance the historic environment throughout the district. Due to the previous use of the site, the location on made ground and the fact that the development will not involve any significant below ground works, the possibility of encountering archaeology during the development of the proposal is low. The low level, small scale nature of the development adjacent to the existing industrial sites will mean the development is unlikely to be perceptible from the surrounding areas.

4.2.6 Policy CS17 seeks to promote 'effective stewardship of North Lincolnshire's Wildlife through safeguarding international and national protected sites for nature conservation from inappropriate development. The Humber Estuary that is designated as a Ramsar, Special Protection Area (SPA), Special Area of Conservation (SAC) and Site of Special Scientific Interest (SSSI) and North Killingholme Haven Pits is designated a SSSI. The sites are respectively located 1.7 km and 1 km east from the proposed development site. The proposed development site boundary intersects SSSI Impact Risk Zones for the Humber Estuary SSSI and North Killingholme Haven Pits SSSI. A detailed air quality assessment including consideration of ecological receptors has been undertaken. The report presented at Appendix A presents the results of detailed atmospheric dispersion modelling used to predict the ground level concentration of compounds emitted to atmosphere from the proposed development at sensitive receptors including the Humber Estuary and North Killingholme Haven Pits. A summary of the results of the assessment is provided in Section 5.

4.2.7 Policy CS18 actively promotes development that utilises natural resources as efficiently and sustainably as possible. The small scale development on existing industrial land will provide critical support to Killingholme Power Station and subsequently National Grid in times of partial or full loss of electricity and provide the necessary auxiliary back up power to support EAP and the ongoing establishment of renewable generators.

4.2.8 Policy CS19 supports development proposals that avoid areas of current or future flood risk and do not increase the risk of flooding elsewhere. The policy promotes the use of land for development that has a lower flood risk. The site is located in Flood Zone 1 that represents an area where flooding from rivers and the sea is very unlikely. There is less than a 0.1 per cent (1 in 1000) chance of flooding occurring each year (Appendix C). Due to the design of the development and small scale nature of the site, the development will not increase the risk of flooding elsewhere, hence flood risk is not considered further.

**4.3 The Saved Policies of the North Lincolnshire Local Plan (adopted May 2003).**

4.3.1 The North Lincolnshire Local Plan was adopted in May 2003 and is a consideration in planning decisions. The Local Plan has been replaced by the Local Development Framework. Some of the Local Plan policies have been replaced following the adoption of the Core Strategy, but the majority have been 'saved'. The following 'saved' policies of the Local Plan are of relevance to this planning application.

4.3.2 Local Plan Policy ST1 is a general policy which sets out that the council will seek to secure the three principles of sustainable development; economic, social and environmental. This policy is replaced by Core Strategy policies CS1 (Spatial Strategy for North Lincolnshire) and CS2 (Delivering more Sustainable Development).

4.3.3 Local Plan Policy T2 aims to ensure that all new development is provided with a satisfactory means of access. The proposed development will be accessed and egressed via Chase Hill Road and the existing internal power station road network.

4.3.4 Local Plan Policy LC15 outlines the areas within the district which have been allocated for landscape enhancement. These areas include the South Humber Bank Landscape Initiative within which the proposal site is located. Local Plan Policy LC20 promotes South Humber Bank Landscape Initiative for the provision of landscape improvements associated with large scale industrial development. The proposed development site is located on an existing gravelled and hardstanding area neighbouring large industrial applications of energy generating plant and associated buildings to the west, south and north. There are no existing trees or hedgerows within the application area. Amenity grassland is located east of the proposed development site and Chase Hill Wood 175m east. No vegetation will be removed as a result of the development. The nature of the proposal is similar to the current use of the power station site and will not result in significant landscape impact. It is considered that the proposal is in keeping with the existing highly industrial developments in the area.

4.3.5 Local Plan Policy DS1 seeks to ensure that all new development is of a high quality design which respects the amenity of the surrounding area. The proposed development has been carefully designed to minimise the scale of the structures on site and be in keeping with the current land use. The design is functional, minimises the need for larger scale buildings to house equipment and respects the amenity of the surrounding area. The policy also seeks to protect and conserve the natural environment. Policy DS1 stipulates that development proposals should not conflict with existing Local Plan allocations which are the case for the proposed development.

4.3.6 Local Plan Policy DS11 stipulates that planning permission for development, including extensions to existing premises and changes of use, will only be permitted where it can be demonstrated that the levels of potentially polluting emissions do not pose a danger; result in land contamination; pose a threat to surface or underground water resources; or create adverse environmental conditions likely to affect nearby developments and adjacent areas. The development proposed has been carefully designed to ensure it will not result in land contamination, a threat to water resources or create adverse environmental conditions. An air quality assessment and noise assessment are presented in Appendix A and B respectively which conclude that the development will not result in an impact on air quality or create adverse environmental conditions that could affect nearby receptors or developments.

## 4.4 National Policy

4.4.1 The updated National Planning Policy Framework (NPPF) was published in February 2019 by the Ministry of Housing, Communities & Local Government (MoHCLG, 2019). It replaces the previous NPPF published in March 2012 and revised in July 2018. The NPPF is supported by the National Planning Practice Guidance (PPG), which was first published in March 2014 (as amended), to reflect and support the NPPF.

4.4.2 The NPPF sets out the Government's economic, environmental and social planning policies for England. The policies set out in this framework apply to the preparation of local and neighbourhood plans and therefore is of material consideration to decisions on planning applications.

4.4.3 Paragraph 6 of the NPPF adds that ‘other statements of government policy may be material when deciding applications, such as relevant Written Ministerial Statements and endorsed recommendations of the National Infrastructure Commission’.

4.4.4 Paragraph 11 is central to the NPPF in decision making with 'a presumption in favour of sustainable development. For decision-making, this means approving applications that accord with an up to date development plan without delay’.

4.4.5 If development plan policies are absent or relevant policies are out of date, the planning authority should grant planning permission unless adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF; or specific policies in the NPPF indicate development should be restricted.

4.4.6 In line with the presumption in favour of sustainable development, Paragraph 20 details that ‘strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for infrastructure for…minerals and energy’.

4.4.7 ‘Local planning authorities should approach decisions on proposed development in a positive and creative way. They should use the full range of planning tools available…and work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area’.

4.4.8 The NPPF further sets out a number of core planning policies that should underpin decision making. Those of particular relevance to the proposed Killingholme EAP Facility include:

- Building a strong, competitive economy.
- Meeting the challenge of climate change, flooding and coastal change (support the transition to a low carbon future).
- Conserving and enhancing the natural environment.

4.4.9 NPPF Paragraph 80 identifies the need to support economic growth to build a strong, competitive economy. ‘Planning…decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development….The approach taken should address the challenges of the future’. The importance of the proposed development is addressed in Section 3 of this document and further supported by NPPF Paragraph 80. The proposed development will support security of electricity supply, already identified as a challenge of the future because of increasing intermittent renewable energy generation substituting conventional generation (e.g. government policy that all unabated coal-fired power stations close by 2025). To help meet carbon emission reduction targets, the Applicant has invested and adapted to NG requirements for an EAP capable power station to support the energy transition to renewable or low carbon energy.

4.4.10 NPPF Paragraph 148 details the land-use planning principles that should underpin both plan-making and decision-taking. The principles include the need for planning decisions to ‘support the transition to a low carbon future in a changing climate…minimise vulnerability and improve resilience…and support renewable and low carbon energy and associated infrastructure’. The proposed development is

fundamental in supporting a transition to renewable or low carbon energy generation, by providing independent auxiliary power for back-up energy generating plant when required to assist in the security of electricity supplies.

4.4.11 NPPF Paragraph 154 identifies that when determining planning applications for renewable or low carbon development they 'should not require applicants [for energy development] to demonstrate the overall need for renewable or low carbon energy and recognise that even small-scale projects provide a valuable contribution to cutting greenhouse gas emissions; and approve the application if its impacts are (or can be made) acceptable.' As already discussed, the proposed development serves to provide an independent back-up power supply to Killingholme power station during partial or full power losses. Killingholme power station will subsequently act as a EAP provider to the wider grid network, permitting full restoration of other services connected to the grid. Killinghomle power station will provide back-up power to National Grid when intermittent renewable power sources are absent, thereby assisting the transition to a low-carbon economy. The electricity system is vulnerable without a conventional back-up of power generation presenting a national security risk.

4.4.12 The conservation of habitats and biodiversity within NPPF Paragraph 177 details 'the presumption in favour of sustainable development does not apply where the plan or project is likely to have a significant effect on a habitats site (either alone or in combination with other plans or projects), unless an appropriate assessment has concluded that the plan or project will not adversely affect the integrity of the habitats site'. An air quality assessment and noise assessment are presented in Appendix A and B respectively which conclude that the proposed development will not result in significant impact on air quality, noise or create adverse environmental conditions that could affect local designated habitat sites.

4.4.13 Paragraph 178 of the NPPF details that 'planning policies and decisions should ensure that: a site is suitable for its proposed use taking account of ground conditions and any risks arising from land instability and contamination'. Prior to the construction of the Killingholme Power Station in the early 1990s, the area was arable land. Killingholme Power Station operates under an Environmental Permit regulated by the EA which ensures that robust environmental protection measures are in place at the site and that previous site operations were undertaken in a manner as to not result in significant environmental effects.

4.4.14 NPPF Paragraph 183 demonstrates that 'the focus of planning policies and decisions should be on whether proposed development is an acceptable use of land, rather than the control of processes or emissions (where these are subject to separate pollution control regimes). Planning decisions should assume that these regimes will operate effectively'. The proposed development is located within the ownership and consented operational boundary of Killingholme Power Station. Killingholme power station holds an environmental permit for operation and is regulated by the Environment Agency (EA). The proposed development is considered appropriate development and an acceptable use of land in an existing industrial setting with over 25 year's history of power generation. Operation of the proposed development will also be regulated by EA environmental permit regimes. The proposed development supports the UK's transition to renewable energy generation in support of UK decarbonisation (Net Zero) reduction targets. Development is necessary to provide auxiliary back-up power supply to Killingholme power station in support of a secure, stable and reliable UK electricity system and national security motives.

## 4.5 Overarching National Policy Statement for Energy (EN-1)

4.5.1 In July 2011 the SoS for BEIS (then Energy and Climate Change) set out the National Policy Statements (NPSs) for energy infrastructure. These included an overarching NPS setting out general policies and assessment principles for energy infrastructure and a number of technology specific NPSs.

4.5.2 The NPPF acknowledges that NPSs form part of the overall framework of national planning policy, and are a material consideration in decisions on planning applications. As such the Overarching National Policy Statement for Energy (EN-1) is a material consideration which must be taken into account in the determination of this planning application. Paragraph 2.2.20 of EN-1 states; 'It is critical that the UK continues to have secure and reliable supplies of electricity as we make the transition to a low carbon economy. To manage the risks to achieving security of supply we need sufficient electricity capacity (including a greater proportion of low carbon generation) to meet demand at all times. Electricity cannot be stored so demand for it must be simultaneously and continuously met by its supply. This requires a safety margin of spare capacity to accommodate unforeseen fluctuations in supply or demand.'

4.5.3 Paragraph 3.1.3 of EN-1 stresses that the decision maker should 'assess all applications for development consent 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 in this Part.'

4.5.4 EN-1 makes it clear that there is significant need for new energy infrastructure in the UK that is secure, diverse, sustainable and affordable (Section 3.3). Paragraph 3.3.1 refers to the urgent need for new electricity capacity, stating 'Electricity meets a significant proportion of our overall energy needs and our reliance on it is likely to increase as we move towards our 2050 goals.'

4.5.5 The urgency of the need for new electricity generating capacity is underlined by projections within EN-1 that indicate up to 22 gigawatts ('GW') of existing capacity will close over the period to 2020 in part due to the Industrial Emissions Directive but also as a result of some power stations reaching the end of their operational lives (paragraph 3.3.7). In response to this, EN-1 identifies a minimum need for 59 GW of new generating capacity over the period to 2025 (paragraph 3.3.23).

4.5.6 Paragraph 3.3.11 recognises that flexible electricity generation facilities powered by fossil fuels are required to provide back-up for intermittent renewable energy.

4.5.7 Furthermore, paragraph 3.3.12 refers to the need for back-up generation. It states that the Government believes these types of technologies are likely to be increasingly relied upon in the future as renewables play a progressively important role in a low carbon electricity system.

4.5.8 EN-1 states, 'Gas will continue to play an important role in the electricity sector providing vital flexibility to support an increasing amount of low-carbon generation and to maintain security of supply.'

4.5.9 Section 3.8 highlights the need for nationally significant gas infrastructure, stating, 'Although our reliance on fossil fuels will fall, the transition will take some time, and gas will continue to play an important part in the UK's fuel mix for many years to come.'

4.5.10 Paragraph 3.8.5 states that gas supply infrastructure must be sufficient to meet 'peak' demand. Additionally, paragraph 3.8.15 emphasises how important gas supply capacity is and that providing 'back-up' generation can create a 'high degree of security of supply'.

4.5.11 Paragraph 3.8.19 emphasises the importance of gas in the power generation sector, 'Gas is the cleanest and most reliable fossil fuel… in the power generation sector, as a reliable source of flexible power generating capacity, to back-up intermittent renewables, so underpinning security of supply and price stability in the electrical market.'

4.5.12 Additionally, 'gas demand for power generation could increase substantially due to the greater use of electricity for heat and transport.'

4.5.13 To provide a reliable back up energy supply in a low carbon energy system, the proposed development at Killingholme Power Station will provide capability to assure generation availability and energy security.

### 4.6 Any Other Matters

4.6.1 In making decisions on applications the decision maker can have regard to any other matters that they consider to be both 'important and relevant' to their decision. Paragraph 4.1.5 of EN-1 provides some clarification on such matters, stating that these may include development plan documents or other documents in the local development framework.

4.6.2 EN-1 is clear, however, that in the event of any conflict between a NPS and development plan documents, the NPS prevails for the purposes of decision-making given the national significance of the infrastructure concerned. Where critical infrastructure is apparent this is allied to national security motives.

### 4.7 Ministerial Statement

4.7.1 Paragraph 6 of the NPPF states, 'Other statements of government policy may be material when preparing plans or deciding applications, such as relevant Written Ministerial Statements…'

4.7.2 On 1 March 2016 an announcement was made by the Secretary of State for Energy and Climate Change (now BEIS), which set out a series of changes to the Capacity Market to improve energy security for families and businesses through; "buying more capacity earlier we will protect consumers and businesses from avoidable spikes in energy costs." A statement for prospective developers and investors was; "We're also sending a clear signal to investors that will encourage the secure and clean energy sources we need to come forward – such as gas and interconnectors – as part of our long-term plan to build a system of energy infrastructure fit for the 21st century".

4.7.3 On 3 March 2016 the Energy and Climate Change Committee published a report on investor confidence. This sets out the Government's plans to secure investment in clean, secure and affordable energy. Thus, there is a clear policy direction to deliver a long term plan which includes the reliable security of gas generators playing a key role in the energy infrastructure mix, and the proposed development at Killingholme is fully aligned with this.

# 5 ENVIRONMENTAL CONSIDERATIONS

5.1.1 The purpose of the proposed development is to provide auxiliary back up power for Killingholme power station to act as EAP in recovery from a total or partial shutdown of the electricity transmission system which has caused extensive or total loss of supply. Subsequently, Killingholme power station will act as EAP to the wider electricity transmission system as instructed by NG. In line with Government aspirations a network of EAP plants creates a more resilient system in the transition to renewable energy generation. Weather related renewable generation represent an intermittent source of energy and therefore inherently increase the potential risk of blackouts on the electricity network. Back-up generation provided by gas-fired power stations support the necessary transition to increasing renewable energy generation on the network, by acting as a restoration response mechanism. The proposed EAP facility will therefore reinforce availability and reliability of Killingholme gas-fired power station in full or partial loss of the electricity network to protect businesses and communities from power outages. The proposed development for an EAP facility fully accords with the NPPF and NPS in seeking to provide security in energy provision locally and nationally and contributes towards the objectives of Local Policy CS18 Sustainable resource use and climate change.

5.1.2 The application site is suitable for the type of use proposed as it is previously developed land within an industrial setting and is well separated from sensitive receptors, with the closest neighbouring residential property located 780 metres west southwest of the application area. The proposal is not in conflict with Policy CS2 of the Core Strategy. Although the site is not within development limits it is adjacent to South Humber Bank and fulfils the requirement of the policy to contribute towards achieving sustainable development and is not in conflict with the seven principles listed in the policy.

5.1.3 The NPPF explains that all communities have a responsibility to help increase the use and supply of green energy, but this does not mean that the need for reliable and reserve capacity for renewable energy automatically overrides environmental protections and planning concerns. As with other types of development, it is important that the planning concerns of local communities are properly met in matters that directly affect them. In this section the environmental considerations of the proposed development are discussed in relation to the policy context. The considerations covered are:

- design and landscape;
- environmental protection;
- environmental permitting;
- air quality;
- noise;
- biodiversity;
- Best Available Technique and
- sustainability.

## 5.2 Design and Landscape

The design of the proposed development has been determined based on input from suppliers of the plant and consideration of similar developments elsewhere in the UK.

The scale of the development has been kept to a minimum with the tallest structures being the exhaust stacks at 8.16m tall. Based on a review of the site and the surrounding landscape which is generally flat with applications of industrial energy generation related buildings and plant and isolated areas of tree planting, it is considered that the effects on any landscape resources locally will be minimal. Due to the existing industrial structures in the vicinity and the general lack of visibility of the proposed development area, it is considered that the design is appropriate for the context of the area. The EAP facility may be visible from the public rights of way to the north east of the site, but these views would be transient through existing vegetation. It is concluded that the proposed development is not in conflict with the objectives of Policy CS5 or DS1.

## 5.3 Environmental Protection

5.3.1 Information on the conceptual site model for the proposed application site is available from the original Environmental Statement for the power station (E.ON, 1996) and the PPC permit application (E.ON, 2005). Prior to the start of construction of the CCGT in 1990, the site comprised open agricultural fields. The station was commissioned in 1993 (historic maps show agricultural land from 1886 to 1993). The site is underlain by Till (Devensian). These deposits comprise firm to stiff sandy clay with occasional cobbles and boulders and are present from ground level down to a depth of 15 – 22m. This includes a transition zone of up to 2m of clayey sand and silt grading into clayey gravel with chalk cobbles. British Geological Survey (BGS) borehole logs from within the centre of the Killingholme site confirm the presence of firm-stiff brown glacial till / clay to approximately 18m below ground level (bgl), with a sandy, silty gravelly transition layer (18-20m bgl) before reaching the Chalk at approximately 20m bgl. The Burnham Chalk Formations are known to underlie the Till across the site at depths of approximately 15-22m bgl to over 180m bgl. The top 5m to 10m of the Chalk has been identified as being weathered chalk gravel in a silty matrix. Below this the Chalk is thinly bedded with flint nodules.

5.3.2 There are no drainage ditches within the application site. The nearest surface water features are onsite drainage ditches (northern parts of the power station site and along southern boundary), power station attenuation pond, and surface water pond that is located within the south eastern site areas of Chase Hill Wood. The drainage ditches along and to the south of the power station site drain to the North Killingholme Haven Pits SSSI, to east / north east. The closest recorded surface water abstractions are from tidal River Humber sources, for general washing / process uses, located approximately 1.3 - 1.5 km east. The closest surface water abstraction on land is located approximately 2.65 km to the northwest for general agriculture / spray irrigation usage.

5.3.3 The Environment Agency classifies the superficial deposits beneath the site as Unproductive Strata. This designation indicates rock layers or drift deposits with low permeability that have negligible significance for water supply or river base flow. As such the till acts as a barrier to downward migration of groundwater from the Chalk. The Burnham Chalk beneath the site has been classified as a Principal Aquifer. This designation indicates layers of rock or drift deposits that have high intergranular and/or fracture permeability, meaning they usually provide a high level of water storage. They may support water supply and/or river base flow on a strategic scale. In most cases, principal aquifers are aquifers previously designated as major aquifer. The Environment Agency identifies no Source Protection Zones (SPZs) within a 0.5 km radius of the site. The nearest source protection zones are shown approximately 1.5

km to the west. The closest recorded groundwater abstraction is located 500m north east (Licence 4/29/09/*G/0008), operated by Inter Terminals LTD (previously Simon Storage Group Ltd) for process water.

5.3.4 There has been one record historic pollution incident (October 2011) reported for land contamination on the Killingholme site. The pollution incident occurred within the contractors' compound area (200m west from proposed development) which involved the discharge of fuel to ground from a contractors' compressor. The incident was reported to the EA and the contaminated soils removed off site. Verification sampling confirmed that the area had been satisfactorily remediated.

5.3.5 It is proposed that the GRE containers will be placed on concrete slabs to be installed within the area immediately east of the Gas Turbine Building and bypass ducts (Figure 4) which will require minimal intrusion into the ground. Piling will not be necessary at the site during construction of the development. The storage of chemicals and lubricants on site will be kept to a minimum, with engineers bringing supplies to site for maintenance as and when required. The main plant will be housed in individual containers that will provide appropriate integral bunding in the unlikely event of a release. It is considered that based on the site geology, hydrogeology and hydrology and the limited possibility for a pollution incident the risk of land contamination is low. The proposal is in accordance with the relevant policies and guidance in the NPPF for contaminated land.

## 5.4 Environmental Permitting

5.4.1 Killingholme Power Station holds an environmental permit (EPR/VP3933RJ) under the requirements of the Environmental Permitting (England and Wales) Regulations 2016 ("the EPR Regulations 2016"). The applicant will be submitting an application under the EPR Regulations 2016 for a variation to Killingholme Power Station's Environmental Permit to cover the proposed operation of an EAP facility. The permit variation application will be supported by comprehensive air quality and noise assessments and a Best Available Technique (BAT) Statement amongst other environmental considerations.

## 5.5 Air Quality

5.5.1 Without appropriate controls during the construction phase impacts on air quality may result from dust generation and migration from site. Minimal earthworks will be necessary on site during the construction phase. It is likely that a small volume of the top surface of the site gravelled areas may be removed to provide the base for the concrete plinths and to allow for cable and pipeline runs. Small numbers of vehicle movements will occur during the construction phase – estimated to be a maximum of 5 per day. Mitigation will be undertaken by water suppression of dusty materials as necessary, minimising the amount of materials stored on site and halting dusty operations during particularly windy/dry weather. Contact details for the site representative that will address any complaints from local residents will be provided to the local planning authority and displayed at the site entrance. In the event of a complaint the incident will be investigated and resolved. Any action or preventative measures will be recorded and made available to the planning authority if requested.

5.5.2 The application is supported by an air quality assessment in Appendix A. The site is not located in an Air Quality Management Area. Regarding the operational stack emissions the air quality assessment concludes that the ground level concentrations will be within

acceptable levels at sensitive receptors and will not give rise to any significant adverse effects based on the criteria in the Environmental Protection UK (EPUK)/IAQM Landuse Planning & Development Control: Planning for Air Quality Guidance. There are no constraints to the development in the context of air quality hence the development accords with DS11 relevant to air quality and relevant national planning policy and guidance in the NPPF.

## 5.6 Noise

5.6.1 Construction works associated with concrete plinth preparations and site assembly of mechanical plant components associated with the GREs will involve relatively modest construction activities. The duration of the proposed construction activities will be 3 to 4 months with the groundwork activities for construction limited to up to 1 month during this period. Intrusive and intensive ground works (i.e. piling or extensive excavations) are not anticipated due to the existing state of the site and the containerised character of the plant. Due to the small scale and relatively short build programme any sound associated with the construction of the installation of the GREs is expected to be minor and short duration. As the development area is more than 780m from the nearest residential receptor adverse impacts are not anticipated. Construction work and construction traffic movements will be restricted to daytime periods not take place on Sundays and bank holidays.

Given that construction activities associated with the GRE plant will largely be associated with above ground installation and fabrication, it is considered that vibration effects during the construction will not be discernible at any noise sensitive receptors.

5.6.2 Post construction the source of noise will be from the GREs and associated plant when operational. With the exception of a genuine emergency on the UK Electricity Grid, the GRE plant will only operate for testing/proving purposes – typically 30-60 minutes duration once a week during the daytime. Operational hours of the plant outside of testing hours will be dictated by the demands of National Grid but will be during infrequent emergency auxiliary power episodes only.

5.6.3 The noise assessment provided in Appendix B considers the noise impact arising from the operation of the proposed development. The assessment has been undertaken in line with the BS4142 approach which considers the magnitude of the predicted rating noise level relative to the background level.

5.6.4 The background noise level in the vicinity of the site is typically within the range 35-40 dBA $L_{A90}$ at the nearest residential receptors in East Halton. The nearest residential properties on the lanes of East Halton range in between 780m -1250m west of the application site. For all locations the rating noise level for the GRE plant is estimated to be less than the lower range of the background $L_{A90}$ levels. For this magnitude of level difference BS412 states that “this is an indication of the specific noise source having a low impact, depending on the context.” To assess context, the noise assessment takes into account the operational pattern of the GREs and the environmental noise context and prescribes circumstances for consideration including variable levels of similar character residual sound, predominantly upwind propagation conditions and short duration day-time only operation. At the nearest receptor, which is 780m to the west southwest, it is predicted that the GRE noise will have a rating level of 33 dB, which is slightly higher than other locations, but below the 35-40 dB $L_{A90}$ representative background range.

5.6.5 Overall, taking into consideration the predicted rating level and context, it is considered that GRE daytime test operation would only give rise to no adverse impact.

5.6.6 East Halton residential receptors may also be subject to additional industrial noise in the future from a variety of committed developments. The cumulative impact from GREs operating at the same time as committed developments has been considered in the noise assessment. In the extremely unlikely event that three plant (four OCGTs, two Synchronous Compensator units (planned) and proposed GREs) were to operate simultaneously, then the total specific noise level from combined activities on site is predicted to be around 37 dB $L_{Aeq}$ at the nearest residential receptor, which is less than the 40 dB $L_{Aeq}$ (≈ 41 dB LA10) agreed historic limit at this location.

5.6.7 No adverse noise impact on nesting birds in the Chase Hill Woods Local Wildlife Site (LWS) from installation or operation of the GREs is anticipated.

5.6.8 It is concluded that taking into account the existing background noise level, the relative magnitude of the GREs noise, contributions from other existing and committed developments that overall the operation of the proposed development would have a low noise impact at residential and ecological receptors locations.

## 5.7 Biodiversity

5.7.1 Local and National planning policies seek to ensure the protection of international, national and local important habitats and species. The Humber Estuary Special Area of Conservation (SAC), Special Protection Area (SPA) and Ramsar are within 10km of the site and the Humber Estuary and North Killingholme Haven Pits Sites of Special Scientific Interest (SSSIs) are within approximately 2km of the application area together with 8 local wildlife sites (refer to Figure 5 of the Air Quality Assessment (AQA) report presented in Appendix A). The AQA considered the potential impacts of the operation of the proposed development on the sites in terms of NOx air concentrations and acid and nitrogen deposition concluding that the development will have no significant adverse effects on local ecologically sensitive designated sites.

5.7.2 The proposed development site is currently an area of hard standing and gravel and is industrial in nature. The site does not offer significant ecological potential. Previous ecological surveys of the site for demolition operations at the power station site did not identify any ecology worthy of note in the application area. Given the scale of the development, existing condition of the site and the distance between the development site and the closest nature designated site, it is considered the development will not result in ecological effects and is in accordance with the provisions of local policy CS17. The proposal complies with all national planning policy and guidance in relation to ecology and biodiversity conservation.

## 5.8 Best Available Techniques

5.8.1 Killingholme Power Station currently exhibits performance associated with the application of Best Available Techniques (BAT) as defined in the Large Combustion Plant BAT Reference (LCP BREF) document, and employs techniques specifically listed as representing BAT in the recent LCP BREF document.

5.8.2 Whilst currently exhibiting performance associated with the application of BAT, Killingholme Power Station was not constructed with network restoration capability, whereby the OCGTs on the existing installation can be started up when isolated and

disconnected from the NG transmission network . To meet the Environment Agency's environmental permit requirements, a variation is needed to the current site permit (EPR/VP3933RJ) to accommodate the operation of the proposed EAP facility. Revision is to be supported by a BAT Statement that has been produced to support the proposed development and is included as Appendix D.

5.8.3 The EAP facility proposed for installation is to include seven individually containerised GREs. Whilst requirements could be provided by a single larger OCGT, the lead time for such a unit would not meet the delivery timeframe that NG require for an EAP restoration service at this location in the electricity transmission system.

5.8.4 Expected emissions are low and given the low expected number of annual operating hours to deliver EAP capability (partial or full blackouts relatively rare), the proposed arrangements can be considered to represent BAT for providing EAP capability for Killingholme Power Station. The EA will continue to regulate Killingholme Power Station under a varied environmental permit.

## 6 CONCLUSIONS

The proposed development seeks detailed planning permission for the construction of an Emergency Auxiliary Power GRE Facility. The objective of the plant is to provide auxiliary power to Killingholme power station to recover from a total or partial shutdown of the transmission system which has caused extensive or total loss of power supply.

The need for emergency auxiliary powerinfrastructure as a restoration service is well established within the national planning policy context. The NPPF sets out at paragraph 148 the importance of the planning system in delivering low carbon energy, whilst also minimising vulnerability and improving resilience and associated infrastructure. The National Policy Statement EN-1 is a material planning consideration and details the importance of delivering energy security through facilities which form a key part of the Government's strategy for decarbonising electricity generation and securing supply. The development generally accords with the relevant policies of the North Lincolnshire Development Plan Documents.

Gas-fired power stations provide the necessary rapid response in supporting baseload energy generation in times of substandard low weather related supplies and or high energy demand. Coal-fired power station closures mean that new EAP facilities are increasingly necessary to ensure adequate levels of back-up power is available to afford a restoration service to support a transition to low carbon energy generation. This also supports UK energy security and national security motives into the future.

GREs represent small scale gas engine technology recognised for their efficient and responsive qualities, able to generate power at very short notice. Thus, they serve as an enabler for a quick reacting and rapid restoration response in auxiliary power provision to primary generating plant in an EAP event.

Based on the assessment in Section 5 of this report and accompanying appendices there are no unacceptable impacts associated with the development proposed and based on the compelling national support and national security motives for such schemes it is recommended that planning permission be granted.