



Department for
Business, Energy
& Industrial Strategy

Department for Business,
Energy & Industrial Strategy

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Your Ref: 14278

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Dear Mr Turnbull

ELECTRICITY ACT 1989

THE ELECTRICITY GENERATING STATIONS (VARIATION OF CONSENTS) (ENGLAND AND WALES) REGULATIONS 2013

SPALDING ENERGY PROJECT, WEST MARSH ROAD, SPALDING, LINCOLNSHIRE

1. THE APPLICATION

1.1 I am directed by the Secretary of State for Business, Energy and Industrial Strategy (“the Secretary of State”) to refer to the application dated 29 January 2021 (“the Application”) on behalf of Spalding Energy Company Limited (“the Applicant”) to vary the consent granted by the Secretary of State under section 36 of the Electricity Act 1989 on 15 November 2000 (“the Section 36 Consent”) to construct and operate an 800MW combined cycle gas turbine (“CCGT”) generating station at West Marsh Road, Spalding, Lincolnshire (“the Development”). The Application also seeks to vary a direction deemed to be granted by the Secretary of State on 15 November 2000 under section 90(2) of the Town and Country Planning Act 1990 (“the Section 90 Direction”) that planning permission for the Development should be granted.

1.2 The Application is to:

- vary the Section 36 Consent and the Section 90 Direction in order to allow an increase in the permitted electrical output of the operational generating station from “about 800MW capacity” to “up to 950MW capacity” (“the Varied

Development”) as facilitated by an upgrade to the existing gas turbines and associated systems; and

- amend the conditions pursuant to which the Section 36 Consent and the Section 90 Direction were granted to: reflect the fact that construction of the generating station is complete; allow for certain further changes to the Section 90 Direction conditions, or matters controlled by those conditions, to be agreed with the local planning authority; and reflect other changes in circumstances since the Section 36 Consent was granted in 2000.

1.3 The Application notes that the Applicant carried out an upgrade to the Development. The upgrade comprised a number of changes to the existing gas turbines and associated systems including: upgrades to the gas turbine combustion system; the replacement of some gas turbine components with more up to date designs; the modification of some Balance of Plant components; an upgrade of the main generator transformer cooling system; and, an upgrade of some Distributed Control System components with the latest digital software platforms.

1.4 The Application also notes that the upgrades: allowed for an increase in the maximum generating capacity of the Development from ‘about 800MW’ to ‘up to 950MW’; allowed for an improvement in the electricity generation efficiency – thus reducing CO2 emissions; increased the overall flexibility of the Development; and improved the availability of the Development by extending the maintenance intervals.

1.5 The Applicant states that the upgrade to the Development did not result in any external changes to any building, equipment, stack dimensions, elevations, footprints or locations. Further, the Applicant also makes reference to the fact that the absence of any changes to those items of infrastructure means there were no effects on the design, size or shape of the Development. The Secretary of State notes that no consultees offered any comments on the Application that indicated any contrary views on these matters to those set out by the Applicant.

2. SUITABILITY OF THE SECTION 36 VARIATION PROCEDURE FOR PERMITTING THE PROPOSED VARIATION

2.1. The guidance issued in 2013, ‘Varying consents granted under section 36 of the Electricity Act 1989 for generating stations in England and Wales’ (“the guidance note”), states:

“Changes in the design of generating stations which have been consented but not constructed which would allow them to generate an amount of power that would be inconsistent with the original consent are likely to be appropriate subject matter for a variation application, provided there are no major changes in the environmental impact of the plant. Similar changes to an existing plant could be appropriate subject matter for a variation application only if they did not involve physical extension of the generating station, relocation of generating plant, or the installation of new equipment that would amount to the construction of a new generating station”.

2.2. The section 36 variation procedure does not allow a change in an existing consent that would result in a development that would be fundamentally different in character or scale from what has been originally granted. Any such changes would be the subject of a fresh application for consent.

2.3 The Secretary of State notes that the Applicant concluded there would be no significant additional impacts arising from the Varied Development when compared to those arising from the currently operational Development.

2.4 The Secretary of State considers that the Varied Development would not be fundamentally different in character or scale from the Consented Development, is in keeping with the guidance note for the section 36 variation procedure and that it is appropriate for this Variation Application to be considered under the section 36 variation procedure.

2.5 The Application was published in accordance with the Electricity Generating Stations (Variation of Consent) (England and Wales) Regulations 2013 (“the Variation Regulations”) and served on South Holland District Council (“the relevant planning authority”).

2.6 Information to support the Application was submitted to the Secretary of State by the Applicant and placed in the public domain (via the Applicant’s web-site) to give those persons with an interest in the Varied Development an opportunity to comment on it.

2.7 The Variation Application was also subject to public consultation between 5 March 2021 and 9 April 2021.

3. SECRETARY OF STATE'S CONSIDERATION OF THE ENVIRONMENTAL INFORMATION

3.1. The Secretary of State notes that a screening opinion was issued to the Applicant on his behalf on 26 June 2020 under regulation 15 of The Electricity Works (Environmental Impact Assessment) (England and Wales) Regulations (“the 2017 Regulations”) which set out that: “the proposed development.....would not result in any new or materially different environmental impacts from those already assessed from the original application.” The screening opinion confirmed that, “the proposed development is not EIA development in accordance with regulation 5 of the 2017 regulations”. There was no need, therefore, for the Applicant to provide information to support the Application in a form which reflected the requirements of the 2017 Regulations.

3.2 The Applicant did, however, provide an ‘Environmental and Technical Schedule’ (*document ID 1281206 version 3*, dated 28 January 2021) as part of the information submitted with the Application. The Environmental and Technical Schedule sets out overviews of: the legislative and local and national planning policy issues related to the Application; the existing Spalding Energy Project; the consultation that had been undertaken in developing the Application; and relevant carbon capture and combined heat and power requirements. The Applicant also provided more detailed information about the individual matters set out in the Environmental and Technical Schedule.

3.3 The Secretary of State considers that the information submitted by the Applicant is sufficient for him to determine whether any potential impacts of the Development are acceptable.

3.4 The Secretary of State has considered the information submitted by the Applicant along with submissions made by consultees and takes the view that there are no matters that would require him to refuse the Application.

4. SECRETARY OF STATE'S CONSIDERATION OF POSSIBLE EFFECTS ON DESIGNATED SITES

4.1 The Secretary of State is prohibited from granting a variation to a section 36 consent unless it can be demonstrated that any proposed change will not adversely affect the integrity of any Special Areas of Conservation ("SACs") and Special Protection Areas ("SPAs") that form part of the National Site Network designated under the Conservation of Habitats and Species Regulations 2017 or there are imperative reasons of overriding public interest.

4.2 The Screening Report that was submitted to the Secretary of State by the Applicant on 5 May 2020 with a request for a screening opinion to be issued by the Secretary of State [which was issued on 29 June 2020] notes that the Spalding Energy Project is not located within a site that forms part of the National Site Network. According to the Screening Report, the designated areas closest to the site are:

- Surfleet Lows Site of Special Scientific Interest ("SSSI") (approximately 3.6 km to the north);
- Cowbit Wash (Geological) SSSI (approximately 5.8 km to the south);
- The Wash and North Norfolk Coast SAC (approximately 11.8 km to the north east);
- The Wash SPA (approximately 11.8 km to the north east);
- The Wash Ramsar site (approximately 11.8 km to the north east);
- The Wash SSSI (approximately 11.8 km to the north east);
- Baston Fen SAC (approximately 13.6 km to the south west);
- Baston and Thurlby Fens SSSI (approximately 13.6 km to the south west);
- Horbling Fen SSSI (approximately 14.5 km to the north west); and,
- Cross Drain SSSI (approximately 14.7 km to the south west).

4.3 The conclusions in the Screening Report stated that the Varied Development altered the flue gas emission and noise emission parameters from those of the existing Spalding Energy Project. However, it also stated that an air quality impact assessment undertaken by the Applicant demonstrated that operation of the Varied Development will not release Nitrogen Dioxide (NO₂) or Nitrous Oxide (NO_x) in a way which materially differs from that of the existing Spalding Energy Project. Similarly, the noise information assessment also undertaken by the Applicant demonstrated that operation of the Varied Development will not release noise in a way which materially differs from that of the existing Spalding Energy Project. Therefore, the likely effects of the Varied Development will not materially differ from those of the existing Spalding Energy Project. The Screening Report also states that the air quality impact assessment and

the noise information assessment demonstrate that there are no areas on or around the site of the Development which could be affected by the Varied Development in a way which materially differs from that of the existing Spalding Energy Project.

4.4 In the 'Environmental and Technical Schedule' that was submitted to the Secretary of State as part of the Varied Application, the Applicant sets out that, given the Secretary of State had determined that the current Application was not EIA development, there was no need for an Environmental Impact Assessment or Environmental Statement to be submitted with the current Application. As noted above, Natural England did not raise any concerns about the impacts of the current Application on protected sites.

4.5 The Conservation of Habitats and Species Regulations 2017 require the Secretary of State to consider whether the Development is likely to have a significant effect on a site designated as part of the National Site Network (either alone or in-combination with other plans or projects).

4.6 On the basis of the information provided and in the absence of any views to the contrary from consultees, the Secretary of State considers that the Varied Development will not have any likely significant effects on any sites designated as part of the National Site Network or other protected sites either alone or in-combination with other plans or projects.

5. ISSUES RAISED DURING CONSULTATION

5.1 As indicated at paragraph 1.5 above, there were no objections to the Application. The submissions to the Secretary of State in response to consultation on the Application were made by Natural England, South Holland District Council, Lincolnshire County Council and the Environment Agency.

5.2 The Secretary of State notes that Natural England did not object to the variation of consent being granted nor did they have any specific comments on any nature conservation issues that might arise from the increase in the generating capacity of the Spalding Energy Project.

5.3 South Holland District Council raised no objections to the Application. As indicated above, the Council had previously responded to the Applicant's request for a scoping opinion by stating that the proposed variation to the Varied Development did not constitute EIA Development under the terms of the 2017 Regulations.

5.4 Lincolnshire County Council stated that it had nothing to raise about the Application.

5.5 The Environment Agency was satisfied that the requested Variation was acceptable and stated that the existing Environmental Permit for the Spalding Energy Project had already been varied to allow for the proposed increase in electricity generating capacity. The Environment Agency commented separately on the Carbon Capture Readiness issues related to the Application (see paragraph 8.8 below).

6. SECRETARY OF STATE'S CONSIDERATION OF OTHER MATERIAL ISSUES

Secretary of State's Consideration of Carbon Capture Readiness ("CCR")

6.1 In order to assist the Secretary of State in his consideration of whether the Varied Development had the potential to be carbon capture ready, the Applicant submitted a 'Carbon Capture Readiness Assessment/Information' document ("CCR Assessment") with the Application. The CCR Assessment concluded that:

- regarding potential CO₂ storage areas/sites, it is considered that there are no major barriers to demonstrating potential CO₂ storage sites are available;
- regarding the technical retrofitting of CO₂ capture equipment requirements, it is considered that there are barriers to demonstrating technical feasibility of retrofitting for CO₂ capture equipment (as there are barriers to demonstrating available space on the existing Spalding Energy Project Development site);
- regarding the technical CO₂ transport requirements, it is considered that there are no major barriers to demonstrating the technical feasibility for CO₂ transport; and,
- regarding the economic assessment, it is considered that there are barriers to demonstrating economic feasibility.

6.2 As indicated above, the Applicant's CCR Assessment concluded that it would be neither technically nor financially feasible to retro-fit CCR infrastructure to the Development. While, as noted above, this scenario would not preclude the Secretary of State from granting the requested variation that is the basis for the current Application, the Environment Agency and BEIS' financial analysts were both asked to look at the information provided by the Applicant in the CCR Assessment and consider whether the technical and financial information used by the Applicant could lead to any different conclusions about the technical and financial viability of retro-fitting CCR infrastructure to the Development.

6.3 The Secretary of State asked the Environment Agency to assess the technical viability of retro-fitting CCR infrastructure to the Varied Development. In its response, the Environment Agency stated.....*"Our conclusion is that there is insufficient land available on site for the carbon capture plant based on current guidance and insufficient information has been provided for the Environment Agency to assess the retrofit of the power plant with post combustion CCP, with regards to technology. Consequently we conclude that there **are** [EA highlight] foreseeable barriers with regards to for [sic] the retrofitting of carbon capture to the 950MWe Spalding Energy Project power plant, due to the lack of land available."*

6.4 Meanwhile, BEIS financial analysts requested additional information to be provided by the Applicant so that they could complete their consideration of the Applicant's conclusion that it was not financially viable to retro-fit CCR to the

Development. The Secretary of State notes that the Applicant provided the additional information requested and his analysts were able to conclude that there are barriers to demonstrating economic feasibility of retro-fitting CCR infrastructure.

6.5 In conclusion, the Secretary of State notes that the Environment Agency and the BEIS financial analysts agree with the Applicant's assessment of the technical and financial unviability of retro-fitting CCR infrastructure to the Varied Development.

6.6 The Secretary of State notes the requirements of the Carbon Capture Readiness (Electricity Generating Stations) Regulations 2013 (the "CCR Regulations") that an order may not be made until the Secretary of State is satisfied as to whether the CCR conditions set out in regulation 2 of the CCR Regulations are met. Having considered those conditions and noting the views of the Environment Agency and BEIS financial analysts, he is satisfied that the CCR conditions have been fully considered but are not met. The Secretary of State is of the view, however, that this itself does not prevent him from granting consent provided that the conditions have been considered in accordance with regulation 6 of the CCR Regulations.

6.7 The Secretary of State has also considered the Carbon Capture Readiness Guidance Note issued by the Department of Energy and Climate Change in 2009¹ but is of the view that this does not apply to this Application and the fact that the Secretary of State would be able to grant a consent for a variation of that section 36 consent despite those failings means the Secretary of State considers that the requested variation should not be refused on the basis of this issue.

6.8 However, to ensure that no opportunities to fit CCR infrastructure are missed, the Secretary of State considers that it would be appropriate to include a condition in the varied section 36 consent to require the Applicant to monitor on a regular basis the possibility of retro-fitting such infrastructure becoming a viable option during the lifetime of the Development. The proposed condition is similar to those applied to a number of other consents for gas-fired generating stations that have been varied under section 36C of the Electricity Act 1989. The Secretary of State requested comments from the Applicant on the wording proposed for the condition. The Secretary of State has considered the Applicant's response, which included a suggestion of a minimum carbon capture rate to mirror the rates in the draft Dispatchable Power Agreement for carbon capture and storage. However, as these relate to issues which are currently being consulted upon, the Secretary of State prefers to retain the original proposed wording for inclusion in any varied consent that might be issued.

Secretary of State's Consideration of Combined Heat and Power

6.9 The Secretary of State notes that the Applicant submitted a 'Supporting Combined Heat and Power (CHP) Assessment/Information' document as part of the current Application. The Assessment concluded that there were no viable CHP opportunities available to the Varied Development.

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https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/43609/Carbon_capture_readiness_-_guidance.pdf

6.10 However, the CHP Assessment also set out that, in the event economically feasible CHP opportunities were identified, then it might be possible to modify the Development to accommodate some form of hot water or steam export infrastructure. The Secretary of State is satisfied that the Applicant's conclusion on CHP precludes any immediate requirement for the necessary infrastructure to be put in place at the existing, operational, facility (by way of retro-fitting). However, in order to ensure ongoing monitoring and assessment of CHP opportunities, the Secretary of State has included a new condition – condition 4(47) – in the varied section 90 deemed planning permission to ensure ongoing review of the potential for CHP deployment with SHDC. The Applicant is content with this approach but suggested the inclusion of some minor variations which the Secretary of State considers are appropriate for inclusion in any varied consent that might be granted.

7 SECRETARY OF STATE'S DECISION ON THE HOLDING OF A PUBLIC INQUIRY

7.1 Regulation 8 of the Variation Regulations gives the Secretary of State discretion to hold a public inquiry into a variation application. In considering whether to hold a public inquiry, the Secretary of State should consider any representations which have been made to the Secretary of State by a relevant planning authority or any other person, where those representations are not withdrawn, and all other material considerations.

7.2 Representations made in respect of the Application were received by the Secretary of State from South Holland District Council (the relevant planning authority), Lincolnshire County Council, Natural England and the Environment Agency. The Secretary of State notes that none of the representations raised any objection to the Application being granted and did not raise any other matters which are material to his decision on whether to hold a public inquiry into the Application. There were no representations received by the Secretary of State save for those submitted by the organisations named above.

Conclusion

7.3 The Secretary of State has carefully considered the views of the relevant planning authority and statutory advisers and all other material considerations. He notes that there were no requests for a public inquiry to be held and that no substantive comments were submitted to him in respect of any matters arising from the Application. The Secretary of State is, therefore, of the view that there is no further information required to enable him to take a decision on the Application and that it would not, therefore, be appropriate to cause a discretionary public inquiry to be held into the Application.

8. OTHER MATTERS

8.1 The Secretary of State has considered the ongoing need for the additional generating capacity of the development that would result from the grant of the requested variation of consent. The Secretary of State notes the *Overarching National Policy Statement for Energy (EN-1)* and the *National Policy Statement for Fossil Fuel Electricity Generating Infrastructure (EN-2)* both set out that for the UK to meet its

energy and climate change objectives there is a continuing need for electricity generating plants of the type proposed by the Applicant given the contribution it will make to securing energy supply.

8.2 On 27 June 2019, following advice from the Committee on Climate Change, the UK Government announced a new carbon reduction 'net zero' target for 2050 which resulted in an amendment to the Climate Change Act 2008 (the target for the net UK carbon account for 2050 changed from 80% to 100% below the 1990 baseline). The Secretary of State notes that the energy National Policy Statements continue to form the basis for decision-making under the Planning Act 2008 and are important and material matters in considering applications to vary section 36 consents.

8.3 The Secretary of State notes that consultation on the review of the energy National Policy Statements commenced on 6 September 2021 and the consultation period closed on 29 November 2021. Although the consultation responses are still being considered, and the National Policy Statements are in draft form and have not been designated, the Secretary of State considers them to be relevant and important matters in considering applications for variations of section 36 consents. As such, he has had regard to the draft energy National Policy Statements in deciding the Application but does not consider that there is anything contained within the drafts of the relevant National Policy Statement documents that would lead us to reach a different decision on the Application. Indeed, paragraph 3.3.35 of the draft Overarching National Policy Statement for Energy (EN-1) states that "electricity generated from unabated natural gas will continue to be needed during the transition to net zero while we develop and deploy the low carbon alternatives that can replicate its role in the electricity system. This will ensure that the system remains reliable and affordable".

8.4 In addition, paragraph 3.3.36 in the draft EN-1 sets out that "Although the expectation is that low carbon alternatives will be able to replicate the role of natural gas in the electricity system over time, some natural gas-fired generation without CCS, running very infrequently, may still be needed for affordable reliability even in 2050 but this can still be net zero consistent if the emissions from their use are balanced by negative emissions from GHG Removal technologies."

8.5 Further, paragraph 1.1.1 of the draft National Policy Statement for Natural Gas Energy Generating Infrastructure (EN-2) sets out that "Electricity generated from unabated natural gas will continue to be needed during the transition to a net zero economy in 2050, and potentially beyond, while we develop and deploy the low carbon alternatives that can replicate its role in the electricity system, ensuring that the system is reliable and affordable".

8.6 Finally, paragraph 21 of Chapter 2 of the Net Zero Strategy which was published on 19 October 2021, sets out that "[B]y 2035, all our electricity will need to come from low carbon sources, subject to security of supply, moving to a fully decarbonised power system whilst meeting a 40-60% increase in demand. Expected residual emissions will be limited to CCUS plants, unabated gas, and energy from waste. This means increased investment in the grid network, electricity storage solutions and flexible grid management, to ensure decarbonisation without risking security of supply."

8.7 In conclusion, the Secretary of State considers that the ongoing need for the Varied Development is established and that granting the requested variation would not be incompatible with the amended Climate Change Act 2008 nor the draft revisions to the National Policy Statements and the published Net Zero Strategy. Overall, the Secretary of State considers that it is beneficial to allow this plant to generate additional capacity through an improvement in its efficiency.

8.8 As noted in paragraph 5.5 above, the Secretary of State is aware that the Varied Development would require an Environmental Permit from the Environment Agency before it could operate. The Secretary of State notes that the Environment Agency confirmed on 13 April 2021 that a variation to the existing Environmental Permit had already been issued to allow for the increase in capacity of 950MW.

9. SECRETARY OF STATE'S CONSIDERATION OF THE REVISED PLANNING CONDITIONS

9.1 The Secretary of State has considered the revised planning conditions. The Secretary of State agrees they are suitable for inclusion in any varied Section 90 Direction which the Secretary of State may give. As indicated at paragraph 6.9 above, the Secretary of State has also included a new condition regarding the future feasibility of Combined Heat and Power that was subject to consultation with the Applicant and the local planning authority.

10. EQUALITY ACT 2010

10.1 The Equality Act 2010 requires public authorities to have due regard in the exercise of their functions to:

- (a) the elimination of unlawful discrimination, harassment and victimisation and any other conduct prohibited by or under the Act;
- (b) the advancement of equality of opportunity between people who share a relevant protected characteristic (e.g. age; gender; gender reassignment; disability; marriage and civil partnerships; pregnancy and maternity; religion and belief; and race.) and persons who do not share it; and
- (c) the fostering of good relations between persons who share a relevant protected characteristic and those who do not share it.

10.2 The Secretary of State has considered the potential impacts of granting or refusing the Application in the context of the general equality duty and has concluded that it is not likely to result in any significant differential impacts on persons sharing any of the protected characteristics and sees no evidence which suggests that such differential impacts are likely in the present case.

10.3 The Secretary of State does not, therefore, consider that either the grant or refusal of the Application is likely to result in a substantial impact on equality of opportunity or relations between those who share a protected characteristic and others or unlawfully discriminate against any particular protected characteristics.

11. HUMAN RIGHTS ACT 1998

11.1 The Secretary of State has also considered the potential infringement of human rights in relation to the European Convention on Human Rights, by the Varied Development. He considers that the grant of a consent in respect of the Varied Development would not violate any human rights as enacted into UK law by the Human Rights Act 1998.

12. NATURAL ENVIRONMENT AND RURAL COMMUNITIES ACT 2006

12.1 The Secretary of State, in accordance with the duty in section 40(1) of the Natural Environment and Rural Communities Act 2006, has to have regard to the purpose of conserving biodiversity, and in particular to the United Nations Environmental Programme Convention on Biological Diversity of 1992, when granting a variation to a section 36 Consent.

12.2 The Secretary of State is satisfied there has been due regard to conserving biodiversity and considers that the matters specified in paragraph 1(2) of Schedule 9 to the Electricity Act 1989 have been adequately addressed by the information that the Applicant submitted to him with the Application.

13. SECRETARY OF STATE'S DECISION ON THE VARIATION APPLICATION

13.1 The Secretary of State, having regard to the matters specified above, has decided to make a variation to the Section 36 Consent for the Development pursuant to section 36C of the Electricity Act 1989. The Section 36 Consent as varied is annexed to the variation decision and subject to the conditions set out in the varied consent.

13.2 The Secretary of State also considers the planning conditions, as revised, form a sufficient basis on which the Varied Development might proceed. The Secretary of State has therefore decided to make a direction under section 90 (2ZA) TCPA to vary the Section 90 Direction on the basis of the conditions specified in the annex to that direction.

13.3 The Secretary of State notes that no physical construction is required as part of these Variation proposals and that there will be no change to the main fuel source. He also notes that there have been no significant changes in the environmental and other impacts identified in relation to the Varied Development. The Secretary of State's conclusions on CCR and CHP are set out above. The Secretary of State is therefore of the view that the Varied Development does not result in a development that is fundamentally different in character or scale to that originally consented. The Secretary of State is of the view that the Varied Development is appropriate and necessary and is satisfied that the changes are of a kind that is reasonable to authorise by means of the variation procedure in section 36C of the Electricity Act 1989.

13.4 I accordingly enclose the Secretary of State's variation of consent under section 36C of the Electricity Act 1989 and a varied direction under section 90(2ZA) of the Town and Country Planning Act 1990.

14. GENERAL GUIDANCE

14.1 The validity of the Secretary of State's decision may be challenged by making an application to the High Court for leave to seek a judicial review. Such an application must be made as soon as possible. Parties seeking further information as to how to proceed, including the relevant time limits for making an application, should seek independent legal advice from a solicitor or legal adviser, or alternatively may contact the Administrative Court at the Royal Courts of Justice, Strand, London WC2 2LL (General Enquiries 020 7947 6025/6655).

14.2 This decision does not convey any approval or consent or waiver that may be required under any enactment, by-law, order or regulation other than sections 36 and 36C of, and Schedule 8 to, the Electricity Act 1989 and section 90 of the Town and Country Planning Act 1990.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Gareth Leigh', enclosed in a light grey rectangular box.

GARETH LEIGH
Head of Energy Infrastructure Planning Delivery