Connah's Quay Low Carbon Power

Draft Natural Resources Wales SoCG

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Prepared for:
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1. Introduction

1.1 Purpose of this Document

1.1.1 This Draft Statement of Common Ground (SoCG) has been prepared by Uniper UK Limited (hereafter referred to as the 'Applicant') to support an application (the Application) to be made to the Secretary of State (SoS) for Energy Security and Net Zero (DESNZ).

1.1.2 The Applicant is seeking a Development Consent Order (DCO) under section 37 of the Planning Act 2008 for the construction, operation (including maintenance) and decommissioning of a proposed low carbon Combined Cycle Gas Turbine (CCGT) Generating Plant fitted with Carbon Capture Plant (CCP) (the 'Connah's Quay Low Carbon Power (CQLCP) Abated Generating Station') and supporting infrastructure (collectively 'the Proposed Development') on land at, and in the vicinity of, the existing Connah's Quay Power Station (Kelsterton Road, Connah's Quay, Flintshire, CH6 5SJ), North Wales (the 'Proposed Development Site').

1.1.3 This SoCG does not seek to replicate information which is available elsewhere within the Application documents. All documents are available on the Planning Inspectorate's website at: Connah's Quay Low Carbon Power Project | National Infrastructure Planning

1.1.4 SoCGs are an established means in the planning process of allowing all parties to identify and so focus on specific issues that may need to be addressed during the examination. This SoCG has been produced to confirm to the Examining Authority (ExA) where agreement has been reached between the parties and where matters are under discussion or where agreement has not been reached. The SoCG will be progressed during the pre-examination and examination periods to reach a final position between the Parties and to clarify if any issues remain unresolved. This draft SoCG will be revised and updated as appropriate and/or required by the ExA at relevant examination deadlines.

1.2 Parties to this Statement of Common Ground

1.2.1 This SoCG has been prepared between (1) the Applicant and (2) Natural Resources Wales (NRW) (jointly referred to as the Parties).

The Applicant

1.2.2 The Applicant is a UK-based company, wholly owned by Uniper SE (Uniper) through Uniper Holding GmbH. Uniper is a European energy company with global reach and activities in more than 40 countries. With approximately 7,500 employees, the company makes an important contribution to security of supply in Europe, particularly in its core markets of Germany, the UK, Sweden and the Netherlands. In the UK, Uniper owns and operates a flexible generation portfolio of power stations, a fast-cycle gas storage facility and two high-pressure gas pipelines, from Theddlethorpe to Killingholme and from Blyborough to Cottam.

1.2.3 Uniper is committed to investing around €8 billion (~£6.9 billion) in growth and transformation projects by the early 2030s and aims to be carbon-neutral by 2040. To achieve this, the company is transforming its power plants and facilities and investing in flexible, dispatchable power generation units. Uniper is one of Europe's largest operators of hydropower plants and is helping further expand solar and wind power, which are essential for a more sustainable and secure future. Uniper is gradually adding renewable and low-carbon gases such as biomethane to its gas portfolio and is developing a hydrogen portfolio with the aim of a long-term transition. The company plans to offset any remaining CO_2 emissions by high-quality CO_2-offsets.

Natural Resources Wales

1.2.4 Natural Resources Wales (NRW) is a Welsh Government-sponsored body, established to ensure the sustainable management of natural resources in Wales. NRW is a prescribed consultee in respect of DCO applications in Wales that are likely to affect land, water, or the environment. The Applicant has consulted NRW throughout the development of the Proposed Development.

1.2.5 NRW's role covers various topics, including:

- managing the risk of flooding from main rivers, reservoirs, and the sea;
- regulating major industry and waste;
- management and remediation of contaminated land;
- protection of water quality and water resources;
- fisheries management;
- Inland river, estuary and harbour navigation; and
- conservation, biodiversity, and ecology.

1.3 Status of this Statement of Common Ground

1.3.1 Noting that NRW have not been provided with an opportunity to comment on draft Application documents ahead of the DCO submission, it has been agreed between the parties that the primary objectives of this revision of the SoCG are to:

- agree the record of engagement summarised in Section 2; and
- seek agreement on the areas of discussion identified in Section 3.

1.3.2 The parties have therefore not included commentary on the status or the likelihood of resolution of each matter, this will be included when NRW have received the application and provided their representations. The parties will continue to work together throughout examination to update the SoCG.

1.4 The Proposed Development

1.4.1 The CQLCP Abated Generating Station would comprise up to two CCGT with CCP units (and supporting infrastructure) achieving a net electrical output capacity of more than 350 megawatts (MW; referred to as MWe for

electrical output) and up to a likely maximum of 1,380 MWe (with CCP operational) onto the national electricity transmission network.

1.4.2 Through a carbon dioxide (CO_2) pipeline, comprising existing and new elements the Proposed Development would make use of CO_2 transport and storage networks owned and operated by Liverpool Bay CCS Limited, currently under development as part of the HyNet Carbon Dioxide Pipeline project (referred to as the 'HyNet CO_2 Pipeline Project'), that will transport CO_2 captured from existing and new industries in North Wales and North-West England, for offshore storage. The captured CO_2 will be permanently stored in depleted offshore gas reservoirs in Liverpool Bay.

1.4.3 For the purposes of the electrical connection, National Grid Electricity Transmission plc (NGET), which builds and maintains the electricity transmission network in England and Wales, is responsible for the operation and maintenance of the existing 400 kV NGET Substation.

1.4.4 A description of the Proposed Development, including details of maximum parameters, is set out in **Chapter 4: The Proposed Development** of the **Environmental Statement** (**ES**) (**EN010166/APP/6.2.4**). At this stage in the development, the design of the Proposed Development incorporates a necessary degree of flexibility to allow for ongoing design development.

1.5 Terminology

1.5.1 Section 3 summarises the issues that are 'agreed', 'not agreed' or are 'under discussion'.

1.5.2 These terms are used as follows:

a. "Agreed" indicates where the issue has been resolved;

b. "Under discussion" indicates where these points will be the subject of on-going discussion wherever possible to resolve, or refine, the extent of disagreement between the parties; and

c. "Not Agreed" indicates a final position where the Parties have agreed to disagree.

2. Record of Engagement

2.1.1 A summary of all meetings and correspondence that have taken place between the Parties in relation to the Application is outlined in **Table 1**. This includes email correspondence between the Parties to discuss sharing of information, arrangement of meetings and where appropriate to comment on draft documentation. **Table 1** reflects the key meetings and emails of note.

Table 1: Record of Engagement

Date	Form of Correspondence	Key topics discussed and key outcomes
General		
22/03/2024	Email (to NRW Development Planning Advice Service)	An email to advise that a Discretionary Planning Advice Application is being prepared and that advice would be sought from NRW in relation to the following topics: • Geology and Soils; • Flood Consequence Assessment; • Water Resources and Water Framework Directive; • Terrestrial Ecology; • Marine Ecology; • Marine Licence; • Net Benefits for Biodiversity (NBB); • Habitats Regulations Assessment (HRA); • Noise; and • Air Quality.
17/04/2024	Email (from NRW's Development Planning Advisor)	An email responding to the Applicant's request for a Discretionary Advice Service (DAS), providing a quote and terms and conditions. Advice was also given on where to obtain the data required for various surveys and assessments.
Terrestrial and Marine Ecology		
01/07/2024	Meeting (Microsoft Teams with NRW and Applicant Marine Ecology Advisors)	A meeting to discuss the marine ecology surveys and

Date	Form of Correspondence	Key topics discussed and key outcomes
		physical processes work that will be taking place.
18/07/2024	Meeting (Microsoft Teams with NRW's and Applicant's terrestrial and marine ecological advisors)	A meeting to discuss and agree ecology survey scope and engage on ecological matters related to the Proposed Development. This related to both terrestrial and aquatic ecology, and marine ecology.
12/12/2024	Meeting (Microsoft Teams with NRW and Applicant's Marine Ecology, Coastal Processes and Fisheries Advisors)	A meeting to provide an update to project programme, changes to the works taking place in the Water Connection Corridor and the anticipated environmental impact pathways.
29/01/2025	Meeting (Microsoft Teams with NRW and Applicant's Marine Ecology Advisors)	A meeting covering: • a Water Connection Corridor design update; • an update on surveys and hydraulic modeling; • the anticipated environmental impact pathways; and • the requirement for marine licensing.
05/03/2025	Meeting (Microsoft Teams with NRW's and Applicant's Ecology and Conservation Advisors)	A meeting covering: • a review of Statutory Consultation comments; • the progress of ecology surveys; • outline of surveys proposed in 2025 • detail of planned GCN mitigation strategy and licence approach; • update on potential mitigation sites for loss of Functionally Linked Land; and • the approach to Abnormal Indivisible Loads (AIL)
08/05/2025	Meeting (Microsoft Teams with NRW's and Applicant's	A meeting was held to present the ornithology results in detail and further discuss the options

Date	Form of Correspondence	Key topics discussed and key outcomes
	Ecology and Conservation Advisors)	for mitigation for the Functionally Linked Land. It was agreed that the methodology for the assessment of noise impacts on birds should accord with the Waterbird Disturbance Mitigation Toolkit (Ref 5). An update was provided on impacts to saltmarsh.
02/06/2025	Meeting (Microsoft Teams with NRW's and Applicant's Ecology and Conservation Advisors)	A meeting was held to present the findings of the Air Quality assessment. An update was provided on impacts to saltmarsh as a result of the works at the surface water outfall area. High level discussion of statement of common ground.
07/07/2025	Meeting (Microsoft Teams with NRW's and Applicant's Ecology and Conservation Advisors)	A meeting was held to discuss air quality impacts on Statutory Designated Sites Dee Estuary/ Aber Dyfrdwy SAC / SPA / Ramsar site, and Deeside and Buckley Newt Sites SAC, as well as offsite mitigation for the loss of Functionally Linked Land.
Water Environment and Flood Risk		
12/04/2024	Email (to Development and Flood Risk Advisor)	An email requesting various information such as information on landfills, ground investigation reports, potential or known contaminated land.
07/05/2024	Meeting (Microsoft Teams with NRW Flood Risk Advisors and Applicant)	A meeting to introduce the Proposed Development and discuss the approach to hydraulic modelling.
04/09/2024	Email (to NRW Flood Risk Advisors)	Submission of Hydraulic Modelling method statement to NRW for comment.
03/10/2025	Email (from NRW Flood Risk Advisors)	Feedback was provided on the Hydraulic Modelling method statement.

Date	Form of Correspondence	Key topics discussed and key outcomes
20/11/2024	Email (to Development and Flood Risk Advisor)	Email to discuss the Outline Surface Water Drainage Strategy and discharge of surface water into the River Dee.
26/02/2025	Meeting (Microsoft Teams with NRW and Applicant's Flood Risk Advisors)	A meeting was held to discuss the completed hydraulic modelling and outputs.
28/03/2025	Email from NRW's Development Planning Advisor	An email from NRW to the Applicant responding to a query on freeboard requirements.
08/05/2025	Email (from NRW's Development Planning Advisor)	Feedback was provided from NRW on the hydraulic modelling and outputs.
21/05/25	Meeting (Microsoft Teams with NRW and Applicant's Flood Risk Advisors)	A meeting was held as an initial discussion on NRW's hydraulic model review comments.
29/07/2025	Meeting (Microsoft Teams with NRW and Applicant's Flood Risk Advisors)	A meeting was held to discuss the updated hydraulic modelling and outputs following feedback from NRW
Geology and Ground Conditions		
15/02/2024	Letter via email (to NRW Development Planning Advisor)	A letter sent via email requesting data to inform the geology and ground conditions assessment.
04/11/2024	Meeting (with NRW Conservation Advisor, NRW Lead Specialist Adviser Wellbeing, Health and Safety, the Applicant's Ground Engineering advisors)	A meeting was held to discuss the proposed Ground Investigations and confirmation of scope, as well as Section 28 assent for the proposed groundwater investigations.

3. Areas of Discussion between the Parties

3.1.1 **Table 2** below details the areas of discussion and matters that are agreed, under discussion and not agreed between the Parties.

Table 2: Areas of Discussion with NRW

Ref	Subject	Relevant Application Document	Applicant Position	NRW Comment	Status	Likelihood of Resolution
1. 0 Engagement						
1.1	Engagement	**N/A**	The pre-application engagement undertaken by the Applicant has been proactive and professional and is reflected accurately in **Table 1** of this SoCG.			
2. 0 Policy and Legislation						
2.1	Policy and Legislation	**ES Volume II Chapter 7: Planning Policy and Need** (**EN010166/APP/6.2.7**) **ES Volume IV Appendix 7-A: Legislative, Policy and Guidance Framework for Technical Topics** (**EN010166/APP/6.4**)	The relevant national policies and appropriate legislative framework with respect to matters relating to NRW's duties have been accurately reported.			
3.0 Description of Proposed Development and Assessment Scenarios						
3.1	Assessment scenarios	**ES Volume II Chapter 2: Assessment Methodology** (**EN010166/APP/6.2.2**)	The assessment scenarios considered in Volume II of the **ES** (**EN010166/APP/6.2**) represent realistic worst-case assessments.			
4.0 Draft Development Consent Order						
4.1	Articles and Schedules	**Draft DCO (EN010166/APP/3.1)**	The wording of the Articles and Schedules in the **Draft DCO (EN010166/APP/3.1)** is appropriate.			
5.0 Air Quality						
5.1	Scope of the assessment	**ES Volume II Chapter 8: Air Quality** (**EN010166/APP/6.2.8**) **ES Volume IV Appendix 8-A: Baseline Air Quality Information** (**EN010166/APP/6.4**)	The scope of the air quality assessment is appropriate and comprehensive. It should be noted that: • **Operational traffic emissions** are scoped in and a detailed assessment of operational traffic effects on local air quality, combined with stack emissions, has been included and is presented in Section 8.6 of **Chapter 8: Air Quality** (**EN010166/APP/6.2.8**) and **Chapter 24: Cumulative and Combined Effects** (**EN010166/APP/6.2.24**); • **Presenting all operational scenario modelling results:** A number of operational			

Ref	Subject	Relevant Application Document	Applicant Position	NRW Comment	Status	Likelihood of Resolution
			scenarios have been modelled and the results from all potential operating scenarios have been included in the final application. Section 8.6 of the air quality assessment (**Chapter 8: Air Quality** (**EN010166/APP/6.2.8**) and **Appendix 8-D Air Quality Operational Assessment** (**EN010166/APP/6.4**)) includes an assessment of the findings of an unabated scenario and both FEED options for the carbon capture process; and • **The operation of existing CCGT units during construction and operation of the Proposed Development:** The Applicant's existing CCGT units at Connah's Quay Power Station will be on-site and operating during construction and operating during periods coinciding with the operation of the Proposed Development as set out in Section 2.2 of **Chapter 2: Assessment Methodology** (**EN010166/APP/6.2.2**).			
5.2	Study area and baseline	**ES Volume II Chapter 8: Air Quality** (**EN010166/APP/6.2.8**) **ES Volume IV Appendix 8-A: Baseline Air Quality Information** (**EN010166/APP/6.4**)	The study area for gathering baseline information is appropriate to the nature of the Proposed Development and its potential effects. It should be noted that: • A three-month survey using diffusion tubes to establish the Nitrogen Dioxide (NO_2) levels in the area immediately surrounding the site was undertaken. The three-month measurement period was projected to the annual statistical data requirements for background measurements via an annualisation exercise to correct the period mean results obtained from the three months survey for seasonal bias. This ensures the data is representative of the whole year. This is detailed in **Appendix 8-A: Air Quality Baseline** (**EN010166/APP/6.4**); • A study area of 15 km has been used to consider potential effects on Sites of Special Scientific Interest (SSSI) and European designated sites in proximity to the Proposed Development with details provided in the Preliminary Ecological Appraisal (PEA) included as Annex 1 of **Appendix 11-C: Botanical Technical Appendix**			

Ref	Subject	Relevant Application Document	Applicant Position	NRW Comment	Status	Likelihood of Resolution
			(**EN010166/APP/6.4**). SSSIs which have been identified to require further consideration within the ES are discussed within **Chapter 11: Terrestrial and Aquatic Ecology** (**EN010166/APP/6.2.11**); and • In order to assess the change in pollutant concentrations in the Study Area in more detail, a baseline scenario considering emissions from the existing Connah's Quay Power Station CCGTs under normal operating conditions, with all sources assumed to be operating for 21% of the year, has been included in this assessment. The assumption of a 21% operational scenario is based on the Applicant's data on the recent historic use of the existing power plant and is considered to be robust enough for use in the assessment.			
5.3	Assessment methodology	**ES Volume II Chapter 8: Air Quality** (**EN010166/APP/6.2.8**)	The assessment methodology used in the air quality assessment is appropriate/acceptable. It should be noted: • The predicted change in air quality statistics due to the operation of the Proposed Development is presented in the ES (**Chapter 8: Air Quality** (**EN010166/APP/6.2.8**)). Where the contribution made by the Proposed Development cannot be screened out, the predicted change in process contribution, accounting for the contribution made by the existing power station, is taken into account when determining the overall change; • Ammonia emission concentrations have been provided by both Front-End Engineering Design (FEED) contractors for abated and unabated operation. The concentrations are significantly below the lower limit of the Large Combustion Plant Best Available Technique (BAT) Associated Emission Levels range for ammonia of 3-10 mg/m^3. As such there is high confidence that these emission levels represent a high standard of slip control for both abated and unabated operation; • In order to be consistent with the latest air emissions risk assessment guidance (Ref 3),			

Ref	Subject	Relevant Application Document	Applicant Position	NRW Comment	Status	Likelihood of Resolution
			a daily background concentration of twice the long term concentration has been used in the calculation of daily Nitrogen Oxide ($NO_{X)}$; and • The air emissions risk assessment guidance was prepared by the Environmental Agency to apply in England, however NRW have also adopted it to apply in Wales.			
5.4	Assessment outcomes	**ES Volume II Chapter 8: Air Quality** (**EN010166/APP/6.2.8**) **ES Volume IV Appendix 8-B: Air Quality Construction Dust Risk Assessment** (**EN010166/APP/6.4**) **ES Volume IV Appendix 8-C: Air Quality Traffic Emission Assessment** (**EN010166/APP/6.4**) **ES Volume IV Appendix 8-D: Air Quality Operational Assessment** (**EN010166/APP/6.4**)	The air quality assessment outcomes in **Chapter 8: Air Quality Assessment** (**EN010166/APP/6.2.8**) are appropriate. A meeting was held with NRW on 2 June 2025 to present the findings of the air quality assessment in relation to ecology: please refer to **Table 1**.			
5.5	Mitigation	**ES Volume II Chapter 8: Air Quality** (**EN010166/APP/6.2.8**) **ES Volume IV Framework Construction Environmental Management Plan** (**CEMP**) (**EN010166/APP/6.5**)	All relevant mitigation measures in **Chapter 8: Air Quality** (**EN010166/APP/6.2.8**) are adequately secured through the **Framework CEMP** (**EN010166/APP/6.5**), of which preparation of a detailed version(s) is secured through a requirement in the **Draft DCO (EN010166/APP/3.1)**. The proposed mitigation set out is appropriate for managing construction, operation and decommissioning impacts from the Proposed Development. **Appendix 8-B: Air Quality Construction Dust Risk Assessment** (**EN010166/APP/6.4**) contains dust control measures which have been incorporated into the **Framework CEMP** (**EN010166/APP/6.5**).			

Ref	Subject	Relevant Application Document	Applicant Position	NRW Comment	Status	Likelihood of Resolution
5.6	Residual effects after mitigation	**ES Volume II Chapter 8: Air Quality** (**EN010166/APP/6.2.8**)	The residual effects reported after mitigation are appropriate and reflect the fact that the mitigation hierarchy has been followed in the assessment.			
6.0 Terrestrial and Aquatic Ecology						
6.1	Scope of the assessment	**ES Volume II Chapter 11: Terrestrial and Aquatic Ecology** (**EN010166/APP/6.2.11**)	The scope of the terrestrial and aquatic ecology assessment is appropriate and comprehensive.			
6.2	Study area and baseline	**ES Volume II Chapter 11: Terrestrial and Aquatic Ecology** (**EN010166/APP/6.2.11**) **ES Volume IV Appendix 11-B: Terrestrial and Aquatic Ecology Baseline Surveys and Study Area** (**EN010166/APP/6.4**)	The study area for gathering baseline species and habitats information is appropriate to the nature of the Proposed Development and its potential effects. Section 11.4 of **Chapter 11: Terrestrial and Aquatic Ecology** (**EN010166/APP/6.2.11**) provides a summary of the baseline conditions within the study area and identifies which ecological features are taken forward for consideration within the assessment presented in Section 11.6.			
6.3	Scope and methodology of terrestrial and aquatic ecology surveys	**ES Volume II Chapter 11: Terrestrial and Aquatic Ecology** (**EN010166/APP/6.2.11**)	The scope and methodology of the terrestrial and aquatic ecology surveys have been discussed and agreed upon with NRW during meetings in July 2024 and March 2025 – refer to **Table 1**.			
6.4	Assessment methodology	**ES Volume II Chapter 11: Terrestrial and Aquatic Ecology** (**EN010166/APP/6.2.11**) **Survey Reports** (**ES Volume IV Appendix 11-C to 11-L, EN010166/APP/6.4**)	The assessment methodology used in the terrestrial and aquatic ecology assessment is appropriate/acceptable. The terrestrial and aquatic ecology assessment is supported by Survey Reports as technical appendices (**EN010166/APP/6.4**) which include a detailed account of the baseline surveys undertaken and their results. The terrestrial and aquatic ecology assessment presents an assessment of the effects of the Proposed Development and considers the potential impacts in accordance with Schedule 4(5) of The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (Ref 4).			

Ref	Subject	Relevant Application Document	Applicant Position	NRW Comment	Status	Likelihood of Resolution
6.4	Assessment outcomes	**ES Volume II Chapter 11: Terrestrial and Aquatic Ecology** (**EN010166/APP/6.2.11**)	The terrestrial and aquatic ecology assessment has adequately assessed the likely significant effects of the Proposed Development on the receptors identified in **Chapter 11: Terrestrial and Aquatic Ecology** (**EN010166/APP/6.2.11**). It should be noted that the assessment methodology for the terrestrial and aquatic ecology assessment is presented in **Appendix 11-A: Ecological Impact Assessment Methodology Report** (**EN010166/APP/6.4**) which identifies that effects are considered in the context of conservation status (where applicable). In addition, the assessment presented in Section 11.6 of **Chapter 11: Terrestrial and Aquatic Ecology** (**EN010166/APP/6.2.11**) has considered whether the Proposed Development would have any effect on the ability of the species considered to maintain Favourable Conservation Status.			
6.5	Mitigation and compensation measures	**ES Volume II Chapter 11: Terrestrial and Aquatic Ecology** (**EN010166/APP/6.2.11**) **Outline Landscape and Ecological Management Plan** (**LEMP**) (**EN010166/APP/6.9**) **Framework CEMP** (**EN010166/APP/6.5**) **Appendix 15-F: Colour Analysis (EN010166/APP/6.4** **Lighting Strategy (EN010166/APP/7.10)**	All relevant mitigation and monitoring measures are captured within the **Outline LEMP** (**EN010166/APP/6.9**), **Framework CEMP** (**EN010166/APP/6.5**) or the **Lighting Strategy (EN010166/APP/7.22**) where applicable, and the preparation, approval and implementation of final versions of these documents is secured through the relevant requirements in the **Draft DCO** (**EN010166/APP/3.1**). The **Framework CEMP** (**EN010166/APP/6.5**) includes mitigation such as: • the appointment of an Ecological Clerk of Works (ECoW); • precautionary methods of working, including ecological safeguarding zone of 30m • control measures on certain construction activities, such as sediment control measures around the Kelsterton Brook/Old Rockcliffe Drain culvert;			

Ref	Subject	Relevant Application Document	Applicant Position	NRW Comment	Status	Likelihood of Resolution
			• seasonal time constraints, such as the clearance of vegetation outside of breeding bird season; and • works within the Water Connection Corridor: refurbishment and upgrades to the existing intake structure would be undertaken by divers and a support boat and/or barge, or similar, and foot-only access. Additionally, works must not interact with the riverbed. All materials and plant (if required; it is expected that the majority of works within the Water Connection Corridor will require hand tools only) must be stored within the support barge and a working area would be established using scaffolding attached to the existing protection structure			
6.6	Residual effects after mitigation	**ES Volume II Chapter 11: Terrestrial and Aquatic Ecology (EN010166/APP/6.2.11)**	The residual effects reported after mitigation are appropriate and reflect the fact that the mitigation hierarchy has been followed in the assessment.			
7.0 Net Benefit for Biodiversity (in the context of protected sites and species)						
7.1	Assessment methodology	**Green Infrastructure Statement** (**EN010166/APP/6.12**)	The Applicant has prepared the **Green Infrastructure Statement** (**EN010166/APP/6.11**) to summarise the Net Benefit for Biodiversity (NBB) assessment. The methodology used for gathering information for baseline conditions relating to the initial NBB assessment is appropriate to the nature of the Proposed Development and its potential effects. The consideration of habitat enhancements within the **Curlew Mitigation Strategy** (**EN010166/APP/6.13**) are appropriate to consider in the NBB assessment presented in the **Green Infrastructure Statement** (**EN010166/APP/6.11**).			
7.2	Data collection, methods, baseline data and the identification and sensitivity of relevant features and receptors	**Green Infrastructure Statement** (**EN010166/APP/6.12**)	The approach used for the NBB assessment follows standard best practice for projects of this nature. The baseline data used are appropriate and follow standard guidelines.			

Ref	Subject	Relevant Application Document	Applicant Position	NRW Comment	Status	Likelihood of Resolution
7.3	Assessment findings	**Green Infrastructure Statement** (**EN010166/APP/6.12**) **Off-site Net Benefit for Biodiversity (NBB) and Green Infrastructure (GI) Strategy (EN010166/APP/6.14)**	The findings of the NBB assessment are appropriate.		Under discussion	
8.0 Report to Inform the Habitats Regulations Assessment						
8.1	Assessment methodology	**Report to Inform the Habitats Regulations Assessment** (**EN010166/APP/6.12**)	The survey baseline used in the **Report to Inform the Habitats Regulations Assessment** (**EN010166/APP/6.12**) is appropriate/acceptable. The methodology used in the Report to Inform the Habitats Regulations Assessment is appropriate.			
8.2	Data collection, methods, baseline data and the identification and sensitivity of relevant features and receptors	**Report to Inform the Habitats Regulations Assessment** (**EN010166/APP/6.12**)	The approach used for the **Report to Inform the Habitats Regulations Assessment** (**EN010166/APP/6.12**) follows standard best practice for projects of this nature. The baseline data used are appropriate and follow standard guidelines. The list of sites considered at the screening stage is appropriate.			
8.3	Assessment findings	**Report to Inform the Habitats Regulations Assessment** (**EN010166/APP/6.12**)	The findings of the assessment in the **Report to Inform the Habitats Regulations Assessment** (**EN010166/APP/6.12**) are appropriate/acceptable.			
8.4	Securing mitigation (general)	**Report to Inform the Habitats Regulations Assessment** (**EN010166/APP/6.12**) **Framework CEMP** (**EN010166/APP/6.5**)	All relevant mitigation measures specified in relation to minimising dust and noise considered in the **Report to inform the Habitats Regulations Assessment** (**EN010166/APP/6.12**) are adequately secured through the **Framework CEMP** (**EN010166/APP/6.5**).			
8.5	Securing mitigation (Curlew)	**Report to Inform the Habitats Regulations Assessment** (**EN010166/APP/6.12**)	All relevant mitigation measures specified in relation to Curlew the **Report to inform the Habitats Regulations Assessment** (**EN010166/APP/6.12**) are adequately secured through the **Curlew Mitigation Strategy** (**EN010166/APP/6.13**).			

Ref	Subject	Relevant Application Document	Applicant Position	NRW Comment	Status	Likelihood of Resolution
		Curlew Mitigation Strategy (**EN010166/APP/6.13**). **Draft DCO** (**EN010166/APP/3.1**)	The proposed mitigation is appropriate for managing construction impacts from the Proposed Development and is adequately secured via the requirements in the **Draft DCO** (**EN010166/APP/3.1**).			
8.6	Securing mitigation (Saltmarsh)	**Report to Inform the Habitats Regulations Assessment** (**EN010166/APP/6.12**) **Framework CEMP** (**EN010166/APP/6.5**) **Outline LEMP** (**EN010166/APP/6.9**)	All relevant mitigation measures specified in relation to saltmarsh creation and restoration considered in the **Report to inform the Habitats Regulations Assessment** (**EN010166/APP/6.12**) are adequately secured through the **Framework CEMP** (**EN010166/APP/6.5**) and the **Outline LEMP** (**EN010166/APP/6.9**).			
9.0 Marine Ecology						
9.1	Scope of assessment	**ES Volume II Chapter 12: Marine Ecology** (**EN010166/APP/6.2.12**)	The scope of the marine ecology assessment is appropriate and comprehensive. It should be noted that: • Following Statutory Consultation, the extent and scope of works required in the Water Connection Corridor has been reduced. A meeting was held with NRW on 01 July 2024 to discuss the surveys required in the Water Connection Corridor in light of these changes; and • Pen Llŷn â'r Sarnau SAC has been considered and is identified within the baseline section (Section 12.4) and relevant impacts identified are assessed in Section 12.6 of **Chapter 12: Marine Ecology** (**EN010166/APP/6.2.12**).			
9.2	Study area and baseline	**ES Volume II Chapter 12: Marine Ecology** (**EN010166/APP/6.2.12**) **ES Volume IV Appendix 12-B: Relevant Designated Sites** (**EN010166/APP/6.4**)	The study area for gathering baseline information is appropriate to the nature of the Proposed Development and its potential effects.			

Ref	Subject	Relevant Application Document	Applicant Position	NRW Comment	Status	Likelihood of Resolution
		ES Volume IV Appendix 12-C: Marine Ecology Plates (**EN010166/APP/6.4**) **ES Volume IV Appendix 12-D: Intertidal Survey Report** (**EN010166/APP/6.4**)				
9.3	Assessment methodology	**ES Volume II Chapter 12: Marine Ecology** (**EN010166/APP/6.2.12**) **ES Volume IV Appendix 12-A: Marine Ecology Assessment Methodology** (**EN010166/APP/6.4**)	The assessment methodology used in the marine ecology assessment is appropriate/acceptable.			
9.4	Assessment outcomes	**ES Volume II Chapter 12: Marine Ecology** (**EN010166/APP/6.2.12**) **ES Volume IV Appendix 12-E: Marine Biosecurity Risk Assessment** (**EN010166/APP/6.4**)	The marine ecology assessment has adequately assessed the likely significant effects of the Proposed Development on the receptors identified in **Chapter 12: Marine Ecology** (**EN010166/APP/6.2.12**).			
9.5	Mitigation	**ES Volume II Chapter 12: Marine Ecology** (**EN010166/APP/6.2.12**) **Framework CEMP** (**EN010166/APP/6.5**) **ES Volume IV Appendix 12-F Marine Invasive Non-Native Species Outline Management Plan** (**EN010166/APP/6.4**)	All relevant mitigation measures in **Chapter 12: Marine Ecology** (**EN010166/APP/6.2.12**) are adequately secured through the **Framework CEMP** (**EN010166/APP/6.5**). The proposed mitigation set out is appropriate for managing construction, operation and decommissioning impacts from the Proposed Development. A Marine Invasive Non-Native Species Outline Management Plan (**Appendix 12-F Marine Invasive Non-Native Species Outline Management Plan** (**EN010166/APP/6.4**)) has been produced and preparation, approval and implementation of a detailed version(s) is secured through the DCO.			

Ref	Subject	Relevant Application Document	Applicant Position	NRW Comment	Status	Likelihood of Resolution
9.6	Residual effects after mitigation	**ES Volume II Chapter 12: Marine Ecology** (**EN010166/APP/6.2.12**)	The residual effects reported after mitigation are appropriate and reflect the fact that the mitigation hierarchy has been followed in the assessment.			
9.7	Marine Licence	**Consents and Agreements Position Statement** (**EN010166/APP/3.3**)	The works below the Mean High Water Springs limit require a Band 3 Marine Licence.			
10.0 Water Environment and Flood Risk						
10.1	Scope of assessment	**ES Volume II Chapter 13: Water Environment and Flood Risk** (**EN010166/APP/6.2.13**) **ES Volume IV Appendix 13-C: Flood Consequence Assessment** (**EN010166/APP/6.4**) **ES Volume IV Appendix 13-D Outline Surface Water Drainage Strategy** (**EN010166/APP/6.4**)	The scope of the water environment and flood risk assessment is appropriate and comprehensive. It should be noted that: • The high groundwater table has been considered in the assessment; • No works requiring watercourse crossings are expected within the Repurposed CO_2 Connection Corridor; • No new culverting of watercourses is proposed; • There are no longer any works proposed in the River Dee aside from minor modifications comprising installation of new 2mm eel screens on existing inlets (with minor repairs to surface concrete, metalwork, and timbers). There would be no physical disturbance of the estuary bed which could mobilise contaminants in sediment (including no requirement for a jack up barge or coffer dam); • The existing permit limits for abstraction and discharge (volume, temperatures and water quality) will be maintained unchanged.; and • The Flood Consequence Assessment (FCA) is provided as **Appendix 13-C: Flood Consequence Assessment** (**EN010166/APP/6.4**) and has taken account of NRW's feedback to both the Scoping Report and statutory consultation.			
10.2	Study area and baseline	**ES Volume II Chapter 13: Water Environment and Flood Risk** (**EN010166/APP/6.2.13**)	The study area for gathering baseline information is appropriate to the nature of the Proposed Development and its potential effects.			

Ref	Subject	Relevant Application Document	Applicant Position	NRW Comment	Status	Likelihood of Resolution
		ES Volume IV Appendix 13-A: Water Environment Baseline Survey and Methodology Report (**EN010166/APP/6.4**)				
10.3	Assessment methodology	**ES Volume II Chapter 13: Water Environment and Flood Risk** (**EN010166/APP/6.2.13**)	The assessment methodology used in the water environment and flood risk assessment is appropriate/acceptable.			
10.4	Assessment outcomes	**ES Volume II Chapter 13: Water Environment and Flood Risk** (**EN010166/APP/6.2.13**) **ES Volume IV Appendix 13-B: Water Framework Directive Assessment Report** (**EN010166/APP/6.4**) **ES Volume IV Appendix 13-C: Flood Consequences Assessment** (**EN010166/APP/6.4**)	The water environment and flood risk assessment has adequately assessed the likely significant effects of the Proposed Development on the receptors identified in **Chapter 13: Water Environment and Flood Risk** (**EN010166/APP/6.2.13**).			
10.5	Mitigation	**ES Volume II Chapter 13: Water Environment and Flood Risk** (**EN010166/APP/6.2.13)** **Framework CEMP** (**EN010166/APP/6.5**) **ES Volume IV Appendix 13-D: Outline Surface Water Drainage Strategy** (**EN010166/APP/6.4**)	A **Framework CEMP** (**EN010166/APP/6.5**) is included within the DCO Application which outlines the control measures for mitigating water quality impacts. This would be developed into (a) detailed CEMP(s) post consent as secured through a requirement in the **Draft DCO (EN010166/APP/3.1)**. The detailed CEMP(s) will be supported by a Water Management Plan to be submitted post consent but prior to construction. NRW would be consulted on these documents prior to them being approved by the local planning authority and prior to construction. The proposed mitigation set out in the **Framework CEMP** (**EN010166/APP/6.5**) is appropriate for managing construction, operation and decommissioning impacts from the Proposed Development.			

Ref	Subject	Relevant Application Document	Applicant Position	NRW Comment	Status	Likelihood of Resolution
10.6	Residual effects after mitigation	**ES Volume II Chapter 13: Water Environment and Flood Risk** (**EN010166/APP/6.2.13**)	The residual effects reported after mitigation are appropriate and reflect the fact that the mitigation hierarchy has been followed in the assessment.			
10.7	Approach to hydraulic modelling	**ES Volume II Chapter 13: Water Environment and Flood Risk** (**EN010166/APP/6.2.12**)	The Applicant has engaged with NRW regarding their approach to hydraulic modelling, which has been carried out in accordance with a Method Statement that was shared with and approved by NRW.			
10.8	Approach to Water Framework Directive (WFD) assessment	**ES Volume IV Appendix 13-B: Water Framework Directive Assessment Report** (**EN010166/APP/6.4**)	The approach to the WFD assessment, as set out in **Appendix 13-B: Water Framework Directive Assessment Report** (**EN010166/APP/6.4**) is appropriate/acceptable.			
10.9	Conclusions of the WFD Assessment	**ES Volume IV Appendix 13-B: Water Framework Directive Assessment Report** (**EN010166/APP/6.4**)	The conclusions of the WFD assessment, as set out in **Appendix 13-B: Water Framework Directive Assessment Report** (**EN010166/APP/6.4**) are appropriate/acceptable.			
11.0 Geology and Ground Conditions						
11.1	Scope of assessment	**ES Volume II Chapter 14: Geology and Ground Conditions** (**EN010166/APP/6.2.14**)	The scope of the geology and ground conditions assessment is appropriate and comprehensive. It should be noted that: • impacts from unsaturated soil and groundwater deriving from pollution events bypassing the drainage system during operation has been scoped out of this chapter. Drainage design is discussed in **Chapter 13: Water Environment and Flood Risk** (**EN010166/APP.6.2.13**) and also in **Appendix 13-D Outline Drainage Strategy** (**EN010166/APP/6.4**); and • the Proposed Development would require an Environmental Permit to operate, granted under the Environmental Permitting (England and Wales) Regulations, 2016. Further details on the environmental permit are provided in paragraph 14.5.4 of **Chapter 14: Geology and Ground Conditions** (**EN010166/APP/6.2.14**), and the **Consents and Agreements Position Statement** (**EN010166/APP/3.3**) document; and			

Ref	Subject	Relevant Application Document	Applicant Position	NRW Comment	Status	Likelihood of Resolution
			• Preliminary ground investigation has been undertaken and a summary of the soil and groundwater baseline quality and a Stage 1, Tier 2 generic risk assessment is summarised in **Appendix 14-F: Stage 1, Tier 2 Generic Risk Assessment: Soil and Groundwater** (**EN010166/APP/6.4**).			
11.2	Study area and baseline	**ES Volume II Chapter 14: Geology and Ground Conditions** (**EN010166/APP/6.2.14**) **ES Volume IV Appendix 14-E: Agricultural Land Classification Survey** (**EN010166/APP/6.4**)	The study area for gathering baseline information is appropriate to the nature of the Proposed Development and its potential effects.			
11.3	Assessment methodology	**ES Volume II Chapter 14: Geology and Ground Conditions (EN010166/APP/6.2.14)** **ES Volume IV Appendix 14-B: Land Contamination Methodology (EN010166/APP/6.4)**	The assessment methodology used in the geology and ground conditions assessment is appropriate/acceptable.			
11.4	Assessment outcomes	**ES Volume II Chapter 14: Geology and Ground Conditions** (**EN010166/APP/6.2.14**) **ES Volume IV Appendix 14-A: Geo-Environmental Desk Based Assessment** (**EN010166/APP/6.4**) **ES Volume IV Appendix 14-C: Potential Areas of Contamination and Further Risk and Impact Assessment** (**EN010166/APP/6.4**)	The geology and ground conditions assessment has adequately assessed the likely significant effects of the Proposed Development on the receptors identified in **Chapter 14: Geology and Ground Conditions** (**EN010166/APP/6.2.14**).			

Ref	Subject	Relevant Application Document	Applicant Position	NRW Comment	Status	Likelihood of Resolution
		ES Volume IV Appendix 14-D: Agricultural Land Classification Report (**EN010166/APP/6.4**) **ES Volume IV Appendix 14-F: Stage 1, Tier 2 Generic Risk Assessment: Soil and Groundwater** (**EN010166/APP/6.4**)				
11.5	Mitigation	**ES Volume II Chapter 14: Geology and Ground Conditions** (**EN010166/APP/6.2.14**) **Framework CEMP** (**EN010166/APP/6.5**)	A **Framework CEMP** (**EN010166/APP/6.5**) is included within the Application which outlines the control measures for mitigating water quality impacts. A requirement in the **Draft DCO (EN010166/APP/3.1)** secures that detailed CEMP(s) must be prepared, approved and implemented prior to construction of the authorised development. The proposed mitigation set out is appropriate for managing construction, operation and decommissioning impacts from the Proposed Development. It should be noted that: • The extent of 'cut' will not be known until the detailed design. It is assumed that earthworks / excavations / cutting may happen anywhere within the Order limits as a worst-case scenario for the assessment presented in **Appendix 14-C: Potential Areas of Contamination and Further Risk and Impact Assessment** (**EN010166/APP/6.4**). However, the full extent/depth of it is currently unknown; • Reference to dewatering is made in **Chapter 5: Construction Management and Programme** (**EN010166/APP/6.2.5**). Dewatering is also discussed further in **Chapter 13: Water Environment and Flood Risk** (**EN010166/APP/6.2.13**) and **Appendix 13E: Hydrogeological Assessment (EN010166/APP/6.4)**; and;			

Ref	Subject	Relevant Application Document	Applicant Position	NRW Comment	Status	Likelihood of Resolution
			• A strategy to establish the risk of below-ground obstructions will be developed and mitigation measures implemented which could include bulk excavation to remove them, or excavation to a pre-determined cut-off depth to allow new structures to be founded on consistent strata risk. This strategy will be developed at detailed design stage. This measure is included in the **Framework CEMP** (**EN010166/APP/6.5**) which is secured through a Requirement in the **Draft DCO (EN010166/APP/3.1)**.			
11.6	Residual effects after mitigation	**ES Volume II Chapter 14: Geology and Ground Conditions** (**EN010166/APP/6.2.14**)	The residual effects reported after mitigation are appropriate and reflect the fact that the mitigation hierarchy has been followed in the assessment.			
12.0 Landscape and Visual Amenity (Clwydian Range and Dee Valley National Landscape / Area of Outstanding Natural Beauty only)						
12.1	Scope of assessment	**ES Volume II Chapter 15: Landscape and Visual** (**EN010166/APP/6.2.15**)	The scope of the landscape and visual assessment is appropriate and comprehensive.			
12.2	Study area and baseline	**ES Volume II Chapter 15: Landscape and Visual** (**EN010166/APP/6.2.15**) **ES Volume IV Appendix 15-B: Landscape Character** (**EN010166/APP/6.4**) **ES Volume IV Appendix 15-C: Viewpoints** (**EN010166/APP/6.4**)	The study area for gathering baseline information is appropriate to the nature of the Proposed Development and its potential effects. It should be noted that: • updated photography, during clear weather conditions for Viewpoint 15 (Moel Famau, Jubilee Tower, Offa's Dyke Way, Llangynhafal, Denbighshire) was undertaken and is included in **Figure 15-24A: Summer Viewpoint Photography** (**EN010166/APP/6.3**); • the baseline description for Viewpoint 15 - Moel Famau, Jubilee Tower, Offa's Dyke Way, Llangynhafal, Denbighshire has been modified to state the viewpoint is representative of other points along the ridge line within **Appendix 15-C: Representative Viewpoints** (**EN010166/APP/6.4**); and • The Zone of Theoretical Visibility (ZTV) has been updated to reflect the stack height increase and is presented on **Figure 15-8: Zone of Theoretical Visibility - 150 m**			

Ref	Subject	Relevant Application Document	Applicant Position	NRW Comment	Status	Likelihood of Resolution
			Absorber and HRSG Stacks plus 8 m Raised Ground Level (**EN010166/APP/6.3**).			
12.3	Assessment methodology	**ES Volume II Chapter 15: Landscape and Visual** (**EN010166/APP/6.2.15**) **ES Volume IV Appendix 15-A: Landscape and Visual Impact Assessment Methodology** (**EN010166/APP/6.4**)	The assessment methodology used in the landscape and visual assessment is appropriate/acceptable.			
12.4	Assessment outcomes	**ES Volume II Chapter 15: Landscape and Visual** (**EN010166/APP/6.2.15**) **ES Volume IV Appendix 15-D: Landscape Impact Assessment** (**EN010166/APP/6.4**) **ES Volume IV Appendix 15-E: Visual Impact Assessment** (**EN010166/APP/6.4**) **ES Volume IV Appendix 15-F: Colour Analysis** (**EN010166/APP/6.4**) **ES Volume IV Appendix 15-G: Arboriculture Impact Assessment** (**EN010166/APP/6.4**)	The landscape and visual assessment has adequately assessed the likely significant effects of the Proposed Development on the receptors identified in **Chapter 15: Landscape and Visual** (**EN010166/APP/6.2.15**).			
12.5	Mitigation	**Chapter 15: Landscape and Visual** (**EN010166/APP/6.2.15**) **Framework CEMP** (**EN010166/APP/6.5**) **Outline LEMP** (**EN010166/APP/6.9**)	The proposed mitigation set out is appropriate for managing construction, operation and decommissioning impacts from the Proposed Development.			

Ref	Subject	Relevant Application Document	Applicant Position	NRW Comment	Status	Likelihood of Resolution
12.6	Residual effects after mitigation	**Chapter 15: Landscape and Visual** (**EN010166/APP/6.2.15**)	The residual effects reported after mitigation are appropriate and reflect the fact that the mitigation hierarchy has been followed in the assessment.			
13.0 Physical Processes						
13.1	Scope of the assessment	**ES Volume II Chapter 16: Physical Processes** (**EN010166/APP/6.2.16**)	The scope of the physical processes assessment is appropriate and comprehensive. It should be noted that following Statutory Consultation the extent and scope of works required in the Water Connection Corridor has been reduced. A meeting was held with NRW on 01 July 2024 to discuss the surveys required in the Water Connection Corridor in light of these changes.			
13.2	Study area and baseline	**ES Volume II Chapter 16: Physical Processes** (**EN010166/APP/6.2.16**)	The study area for gathering baseline information is appropriate to the nature of the Proposed Development and its potential effects.			
13.3	Assessment methodology	**ES Volume II Chapter 16: Physical Processes** (**EN010166/APP/6.2.16**)	The assessment methodology used in the physical processes assessment is appropriate/acceptable.			
13.4	Assessment outcomes	**ES Volume II Chapter 16: Physical Processes** (**EN010166/APP/6.2.16**)	The physical processes assessment has adequately assessed the likely significant effects of the Proposed Development on the receptors identified in **Chapter 16: Physical Processes** (**EN010166/APP/6.2.16**).			
13.5	Mitigation	**ES Volume II Chapter 16: Physical Processes** (**EN010166/APP/6.2.16**) **Framework CEMP** (**EN010166/APP/6.5**)	The proposed mitigation set out is appropriate for managing construction, operation and decommissioning impacts from the Proposed Development.			
13.6	Residual effects after mitigation	**ES Volume II Chapter 16: Physical Processes** (**EN010166/APP/6.2.16**)	The residual effects reported after mitigation are appropriate and reflect the fact that the mitigation hierarchy has been followed in the assessment.			
14.0 Climate Change						
14.1	Scope of the assessment	**ES Volume II Chapter 20: Climate Change** (**EN010166/APP/6.2.20**)	The scope of the climate change assessment is appropriate and comprehensive.			

Ref	Subject	Relevant Application Document	Applicant Position	NRW Comment	Status	Likelihood of Resolution
14.2	Study area and baseline	**ES Volume II Chapter 20: Climate Change** (**EN010166/APP/6.2.20**) **ES Volume IV Appendix 20-A: Greenhouse Gas Baseline Data and Methodology Report** (**EN010166/APP/6.4**) **ES Volume IV Appendix 20-B: Climate Change Resilience Baseline Data and Methodology Report** (**EN010166/APP/6.4**)	The study area for gathering baseline information is appropriate to the nature of the Proposed Development and its potential effects.			
14.3	Assessment methodology	**ES Volume II Chapter 20: Climate Change** (**EN010166/APP/6.2.20**) **ES Volume IV Appendix 20-A: Greenhouse Gas Baseline Data and Methodology Report** (**EN010166/APP/6.4**) **ES Volume IV Appendix 20-B: Climate Change Resilience Baseline Data and Methodology Report** (**EN010166/APP/6.4**)	The assessment methodology used in the climate change assessment is appropriate/acceptable.			
14.4	Assessment outcomes	**ES Volume II Chapter 20: Climate Change** (**EN010166/APP/6.2.20**) **ES Volume IV Appendix 20-C: Climate Change Resilience Assessment** (**EN010166/APP/6.4**) **ES Volume IV Appendix 20-D: In-combination Climate Change Assessment** (**EN010166/APP/6.4**)	The climate change assessment has adequately assessed the likely significant effects of the Proposed Development on the receptors identified in **Chapter 20: Climate Change** (**EN010166/APP/6.2.20**).			

Ref	Subject	Relevant Application Document	Applicant Position	NRW Comment	Status	Likelihood of Resolution
14.5	Mitigation	**ES Volume II Chapter 20: Climate Change** (**EN010166/APP/6.2.20**) **Framework Construction Environmental Management Plan** (**CEMP**) (**EN010166/APP/6.5**) **ES Volume IV Appendix 20-E: Greenhouse Gas Reduction Strategy** (**EN010166/APP/6.4**)	The proposed mitigation set out is appropriate for managing construction, operation and decommissioning impacts from the Proposed Development. The Greenhouse Gas (GHG) Reduction Strategy, as detailed in **Appendix 20-E: Greenhouse Gas Reduction Strategy (EN010166/APP/6.4)**, sets out how the GHG emissions associated with the Proposed Development should be managed and reduced, including a framework for identifying and prioritising GHG reduction opportunities. This strategy covers GHG reduction opportunities across the Proposed Development's construction, operation, and decommissioning phases. The delivery of this strategy is secured through a Requirement in the **Draft DCO (EN010166/APP/3.1).**			
14.6	Residual effects after mitigation	**ES Volume II Chapter 20: Climate Change** (**EN010166/APP/6.2.20**)	The residual effects reported after mitigation are appropriate and reflect the fact that the mitigation hierarchy has been followed in the assessment.			
15.0 Major Accidents and Disasters						
15.1	Scope of the assessment	**ES Volume II Chapter 22: Major Accidents and Disasters** (**EN010166/APP/6.2.22**) **ES Volume IV Appendix 22-A: Long List of MA&Ds Risk Events** (**EN010166/APP/6.4**)	The scope of the major accidents and disasters assessment is appropriate and comprehensive. It should be noted that: • a number of hazardous substances are likely to be present during the operation of the Proposed Development, which are detailed in Table 22-5 of **Chapter 22: Major Accidents and Disasters** (**EN010166/APP/6.2.22**). It should be noted that Battery Energy Storage System (BESS) is no longer proposed as part of the Proposed Development, and so no BESS chemicals are required; and • The backup electrical battery does not constitute a BESS, and there is no need for an outline Battery Safety Management Plan (oBSMP).			
15.2	Study area and baseline	**ES Volume II Chapter 22: Major Accidents and**	The study area for gathering baseline information is appropriate to the nature of the			

Ref	Subject	Relevant Application Document	Applicant Position	NRW Comment	Status	Likelihood of Resolution
		Disasters (**EN010166/APP/6.2.22**)	Proposed Development and its potential effects.			
15.3	Assessment methodology	**ES Volume II Chapter 22: Major Accidents and Disasters** (**EN010166/APP/6.2.22**)	The assessment methodology used in the major accidents and disasters assessment is appropriate/acceptable.			
15.4	Assessment outcomes	**ES Volume II Chapter 22: Major Accidents and Disasters** (**EN010166/APP/6.2.22**)	The major accidents and disasters assessment outcomes are appropriate/acceptable.			
15.5	Mitigation	**ES Volume II Chapter 22: Major Accidents and Disasters** (**EN010166/APP/6.2.22**) **Framework CEMP** (**EN010166/APP/6.5**)	The proposed mitigation set out is appropriate for managing construction, operation and decommissioning impacts from the Proposed Development. It should noted that where CO_2 capture plants use dangerous substances in quantities above a certain threshold the Control of Major Accident Hazards (COMAH) Regulations 2015 will apply to the whole site. The Applicant will engage the Local Authority (FCC) and Competent Authority with regards to the COMAH Regulations 2015 and Hazardous Substances consent. Please refer to the **Consents and Agreements Position Statement** (**EN010166/APP/3.3**) document.			
15.6	Residual effects after mitigation	**ES Volume II Chapter 22: Major Accidents and Disasters** (**EN010166/APP/6.2.22**)	The residual effects reported after mitigation are appropriate and reflect the fact that the mitigation hierarchy has been followed in the assessment.			
16.0 Materials and Waste						
16.1	Scope of the assessment	**ES Volume II Chapter 23: Materials and Waste** (**EN010166/APP/6.2.23**)	The scope of the materials and waste assessment is appropriate and comprehensive.			
16.2	Study area and baseline	**ES Volume II Chapter 23: Materials and Waste** (**EN010166/APP/6.2.23**) **ES Volume IV Appendix 23-A: Materials and Waste Baseline Data Report** (**EN010166/APP/6.4**)	The study area for gathering baseline information is appropriate to the nature of the Proposed Development and its potential effects.			

Ref	Subject	Relevant Application Document	Applicant Position	NRW Comment	Status	Likelihood of Resolution
16.3	Assessment methodology	**ES Volume II Chapter 23: Materials and Waste** (**EN010166/APP/6.2.23**)	The assessment methodology used in the materials and waste assessment is appropriate/acceptable.			
16.4	Assessment outcomes	**ES Volume II Chapter 23: Materials and Waste** (**EN010166/APP/6.2.23**)	The materials and waste assessment outcomes are appropriate/acceptable.			
16.5	Mitigation	**ES Volume II Chapter 23: Materials and Waste** (**EN010166/APP/6.2.23**) **Framework CEMP** (**EN010166/APP/6.5**), including **Framework Site Waste Management Plan** (**SWMP**)	The proposed mitigation set out is appropriate for managing construction and operation impacts from the Proposed Development. The site is in the immediate vicinity of the Dee Estuary (a SSSI, Special Area of Conservation (SAC), Special Protection Area (SPA) and Ramsar site). It should be noted that: • it is outlined in the **Framework SWMP** within the **Framework CEMP** (**EN010166/APP/6.5**), no material is to be deposited within 10 metres of any watercourse without discussion with NRW (and the Local Lead Flood Authority for ordinary watercourses); • If during construction/excavation works any contaminated material is revealed, the movement of such material either on or off site must be done in consultation with NRW. Any waste excavation material or building waste generated during the development must be disposed of satisfactorily and in accordance with Section 34 of the Environmental Protection Act 1990; and • As outlined in the **Framework SWMP** within the **Framework CEMP** (**EN010166/APP/6.5**), all wastes movement off-site and waste management off-site would be accordance with the relevant regulations; • the activity of importing waste into the site for use as, for example, hardcore must be registered with NRW as an exempt/permitted activity under the Environmental Permitting (England and Wales) Regulations 2016; • Carriers transporting waste from the site must be registered waste carriers and movement of any Hazardous Waste from the			

Ref	Subject	Relevant Application Document	Applicant Position	NRW Comment	Status	Likelihood of Resolution
			site must be accompanied by Hazardous Waste consignment notes; • it is not currently proposed to import waste for use in construction. If recycled aggregate is brought to site this would not be considered a waste since it would be produced in accordance with the WRAP Quality Protocol: Aggregates from Inert Waste (Ref 2); and • As outlined in the **Framework SWMP** within the **Framework CEMP** (**EN010166/APP/6.5**), details of all appointed waste carriers, brokers and contractors would be included in the SWMP to be developed by the contractor, including copies of appropriate waste carrier licences / registrations. • Delivery of a detailed CEMP(s), including a detailed SWMP is secured through a Requirement in the **Draft DCO (EN010166/APP/3.1)**.			
16.6	Residual effects after mitigation	**ES Volume II Chapter 23: Materials and Waste** (**EN010166/APP/6.2.23)**	The residual effects reported after mitigation are appropriate and reflect the fact that the mitigation hierarchy has been followed in the assessment.			

References

Ref 1. Stationary Office (2009). The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009. Accessed 16/10/2024 at The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009

Ref 2. WRAP, Quality Protocol, Aggregates from Inert Waste. Available at: CD1.Y_Quality_Protocol._Aggregates_from_inert_waste._End_of_waste_criteria_for_the_production_of_aggregates_from_inert_waste._WRAP_October_2013..pdf

Ref 3. Environment Agency and Department for Environment, Food & Rural Affairs (Defra), 2016; Air emissions risk assessment for your environmental permit guidance [online]. Available at: https://www.gov.uk/guidance/air-emissions-risk-assessment-for-your-environmental-permit (Accessed 03/06/2025).

Ref 4. UK Government (2017) The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017. Available at: https://www.legislation.gov.uk/uksi/2017/572/schedule/4

Ref 5. Cutts, N., Phelps, A., Spencer, J., & Hemmingway, K. (2013). Waterbird disturbance mitigation toolkit. Tide toolbox, Interreg IVB North Sea Region Programme.

Abbreviations

Abbreviation	Term
AIL	Abnormal Indivisible Loads
BAT	Best Available Technique
BESS	Battery Energy Storage System
CCGT	Combined Cycle Gas Turbine
CCP	Carbon Capture Plant
CEMP	Construction Environmental Management Plan
CO_2	Carbon Dioxide
COMAH	Control of Major Accident Hazards
CQLCP	Connah's Quay Low Carbon Power
DAS	Discretionary Advice Service
DESNZ	Department for Energy Security and Net Zero
DCO	Development Consent Order
EA	Environment Agency
ECoW	Ecological Clerk of Works
ES	Environmental Statement
ExA	Examining Authority
FCA	Flood Consequence Assessment
FEED	Front-End Engineering Design
GHG	Greenhouse Gas
HRA	Habitats Regulations Assessment
MA&Ds	Major Accidents and Disasters
MW	Megawatts
MWe	Megawatts for electrical output
NBB	Net Benefits for Biodiversity
NGET	National Grid Electricity Transmission
NO_2	Nitrogen Dioxide
NO_x	Nitrogen Oxide
NRW	Natural Resources Wales
oBSMP	outline Battery Safety Management Plan
PEA	Preliminary Ecological Appraisal
SAC	Special Area of Conservation
SoCG	Statement of Common Ground
SoS	Secretary of State
SPA	Special Protection Area

SSSI	Sites of Special Scientific Interest
SWMP	Outline Site Waste Management Plan
ZTV	Zone of Theoretical Visibility