



The Planning Inspectorate

BY EMAIL ONLY

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Dear The Planning Inspectorate

Connah's Quay Low Carbon Power Station, Kelsterston Road, Deeside, CH5 4BP

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development. Our remit includes protected sites and landscapes, biodiversity, geodiversity, soils, protected species, landscape character, green infrastructure and access to and enjoyment of nature.

Insufficient Information and Engagement

Through discussions with Natural Resources Wales (NRW) on 27 June 2025 we are aware that an imminent submission to The Planning Inspectorate is expected for Connah's Quay Low Carbon Power Station. NRW shared contact details for the applicant's consultant, AECOM, during this meeting, and we attempted to contact them on 18 July 2025, but have had no reply to date.

Natural England have significant concerns regarding the lack of pre-application engagement we have had with the developer and their consultants, despite the potential cross-boundary impacts. We are concerned about the impact of this proposal on a number of issues likely to need resolving during the examination period should the application be accepted. These issues are discussed in more detail below:

Natural England Interest

As the proposal has the potential to impact notified habitats and species on the English side of the border Natural England have an interest in the project due its location. From information received, there remain uncertainties regarding impacts to Dee Estuary Ramsar, Dee Estuary Special Area of Conservation (SAC), Dee Estuary Special Protection Area (SPA), River Dee and Bala Lake SAC, Mersey Estuary SPA, Mersey Estuary Ramsar, Dee Estuary Site of Special Scientific Interest (SSSI), Mersey Estuary SSSI, River Dee (England) SSSI and Inner Marsh Farm SSSI.

Natural England have expressed an interest in being a consultee for the scheme and Habitats Regulations Assessment (HRA) to both the applicant and their consultants. Natural England are also aware that NRW have flagged that our involvement is required to the consultants involved. Natural England have made a number of attempts to engage but have had no success.

We have outlined the cross-border nature of potential impacts and the need for Natural England to work in collaboration with NRW on the HRA. We highlighted that English component sites may contain differing features to the Welsh element which would require full consideration.

Coastal habitats in the vicinity of the proposal, such as saltmarsh, mudflats, dunes and salt meadows are highly sensitive. There are several energy related proposals within the wider area on the English side of the border that have the potential to act in-combination with this proposal. Therefore, Natural England must be engaged in any in-combination assessment produced.

Background to Information Received

Natural England were not consulted on any reports or documents prior to the Preliminary Environmental Information Report (PEIR). Natural England provided consultee comments on the PEIR on 19 November 2024 (our reference 490265) to Uniper. At that point several surveys were still being conducted in relation to species, and not yet finalised.

On 04 June 2025 (our reference 511985), we received a non-statutory consultation from Uniper for a proposed design update which utilised the PEIR as a comparison of impacts. The design change included a reduced stack height and other supporting infrastructure. Due to our concerns with the PEIR, we did not feel sufficient information had been provided to fully understand the level of impact.

Information Still Required

Natural England outline a summary of outstanding information which is required to assess the significance of impacts and scope for mitigation:

- Provision of a HRA and Environmental Statement (ES)
- Outstanding areas of air quality assessment include:
 - Full identification of potential pollutants and their effect on qualifying features and supporting habitat
 - Assessment of backup or auxiliary power provisions
 - The correct use of screening thresholds
 - Assessment of traffic emissions
 - Provision of an in-combination assessment
- Outstanding assessment of loss and degradation of notified saltmarsh (within the Welsh border)
- Outstanding information to inform impacts to notified bird species and assemblages
 - Additional desk-based data
 - Assessment of noise and construction/decommission phase impacts
 - Assessment of impacts to potential Functionally Linked Land
 - Assessment of impacts to SSSI notified features such as ringed plover
- Outstanding assessment to wider notified species such as otter and invertebrates
- Outstanding assessment of the loss of benthic habitats which are a qualifying feature of the Dee Estuary SAC and the effect of dredging

Going Forward

Natural England would be eager to engage with the developer and signpost our [Discretionary Advice Service](#) for Nationally Significant Infrastructure Projects (NSIPs). We are aware from conversations with NRW that a HRA has since been drafted and we would be very interested in collaborating further.

Please send further correspondence to consultations@naturalengland.org.uk.

Yours faithfully



[Redacted]
Deputy Director, Cheshire to Lancashire Area Team
Natural England