

27 January 2026

Delivered via Email

Planning Inspectorate
C/O Quadrant
69 Buckingham Avenue
Slough
SL1 4PN

Dear Sir / Madam,

APPLICATION BY UNIPER UK FOR AN ORDER GRANTING DEVELOPMENT CONSENT FOR THE CONNAH'S QUAY LOW CARBON POWER PROJECT (PINS REF: EN010166)

WRITTEN REPRESENTATION ON BEHALF OF TATA STEEL EUROPE LIMITED (INTERESTED PARTY REFERENCE: FEDD71333)

On behalf of our client, Tata Steel UK Limited (Tata Steel) (Interested Party Reference: [REDACTED]), please find enclosed Written Representations in relation to the application by Uniper UK for an order granting development consent for the Connah's Quay Low Carbon Power Project. These Written Representations are submitted in accordance with Deadline 1 of the Examination Timetable.

Tata Steel is the freehold owner of Shotton Steelworks (the "Works"). We note that Uniper UK is currently seeking a Development Consent Order relating to a low carbon capture project ("the DCO") in the vicinity of the Works.

We understand that the DCO (and an associated proposed change to such DCO) includes part of the Works, in respect of which temporary possession is potentially sought for the re-establishment and use of waterborne transport offloading facilities at Connah's Quay North and temporary accommodation works to facilitate a haulage route on existing roads.

We further understand that direct discussions have taken place between Uniper UK and our client. To date, no agreement has been reached between the developer and Tata Steel regarding the proposed use of the jetty at Connah's Quay North or routing onward vehicles through its' operational Shotton Works.

We would like to reiterate our client's position communicated to Uniper UK in those discussions, namely:

18 Windsor Place
Cardiff
CF10 3BY

T 029 2034 4445 turley.co.uk

- Whilst (at this stage) our client is not minded to raise a formal objection to the use of part of the Works and the DCO generally, ongoing dialogue between the parties will be required to facilitate the safe use of such part if required;
- The part of the Works currently identified for temporary possession is part of a secure operational steelworks, in respect of which our client is under stringent statutory and other legal obligations to ensure the safety of all persons at the site;
- Our client has not seen any firm proposals for the use of its land. Given the access and security requirements for the operational steelworks, our client is unable to confirm if this is acceptable until surveys have been undertaken and agreements are reached.
- If access is agreed in principle between Uniper UK and our client, prior to any such access being granted, our client will require the proposed developer to enter into a formal written agreement to ensure the safe use of any part of the Works on terms reasonably acceptable to our client (including as to the carrying out of pre-commencement surveys);
- Our client invites Uniper UK to make proposals as to their requirements for access to facilitate such licence (if required); and
- Otherwise, our client's position remains reserved in all respects.

In conclusion, whilst Tata Steel is not currently raising objections to the proposed development itself (based on the information known to-date), no agreement has been reached regarding the acceptability of using the Tata Steel jetty or onward routing of 3rd party vehicles through Tata Steel's operational Works site. Continued discussions on these matters and on the detailed plans of the proposed developer are essential if use of the Tata Steel jetty and its operational Works site are to be considered further.

Tata Steel retains its right to comment further on any relevant submissions by the applicant at the Examination's future consultation stages.

Yours sincerely,

[REDACTED]
Associate Director

[REDACTED]@turley.co.uk