

Connah's Quay Low Carbon Power

Draft Statement of Common Ground between Uniper UK Limited and the Deeside Naturalist Society (Tracked)

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1. Introduction

1.1 Purpose of this Document

- 1.1.1 This Draft Statement of Common Ground (SoCG) has been commissioned 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). The Application was submitted to the Secretary of State for a Development Consent Order (DCO) (the Order) under section 37 of the Planning Act 2008 in July 2025. The Application was accepted for examination on 28 August 2025, and the Examination commenced on 13 January 2026.
- 1.1.2 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: All documents are available on the Planning Inspectorate's website at: Connah's Quay Low Carbon Power Project | National Infrastructure Planning https://national-infrastructure-consenting.planninginspectorate.gov.uk/projects/EN010166
- 1.1.3 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) the Deeside Naturalists Society (DNS) (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 more than €8 billion (~£6.9 billion) in growth and transformation projects by the early 2030s and aims. This includes developing new renewables projects, investing in clean gases such as hydrogen, and new low or zero carbon power plants and by progressively

transforming Uniper's existing fleet into Europe's leading source of zero-carbon power. Uniper intends to be completely carbon-neutral by 2040. To achieve this, the company is transforming and aims for 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 installed 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 CO₂ emissions by high quality CO₂-offsets, generating capacity to be more than 80% zero-carbon by the early 2030s.

Deeside Naturalists Society

1.2.4 The DNS is a registered charity, formed in 1973 to '*stimulate interest in natural history and to play a part in the conservation of flora and fauna on Deeside and in the surrounding area*'.

The DNS has over 400 members who receive regular newsletters and an annual programme card of events and field meetings which are organised throughout the year to places of special ecological interest and importance. Members are provided with a key to access the Connah's Quay Nature Reserve adjacent to the Order limits and may visit in line with the strict rules in place with Uniper. DNS manage the wildlife hides within the reserve and carry out scientific monitoring of birds and other wildlife on a daily basis, both on the nature reserve and adjoining areas including the area proposed for development of the new power station.

1.3 The Proposed Development

1.3.1 The Applicant is seeking a DCO for the construction, operation (including maintenance) and decommissioning of a proposed low carbon Combined Cycle Gas Turbine (CCGT) Generating Station fitted with Carbon Capture Plant (CCP) (the 'Connah's Quay Low Carbon Power (CQLCP) Abated Generating Station') and supporting infrastructure (collectively 'the Proposed Development').

1.3.2 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.

1.3.3 Through a carbon dioxide (CO₂) pipeline, comprising existing and new elements, the Proposed Development would make use of (CO₂) 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 (CO₂) Pipeline Project'), that will transport CO₂ captured from existing and new industries in North Wales and North-West England, for offshore storage. The captured (CO₂) will be permanently stored in depleted offshore gas reservoirs in Liverpool Bay.

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

1.3.5 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/\[APP/6.2.4\]-0421](#)). At this stage in the development, the design of the Proposed Development incorporates a necessary degree of flexibility to allow for ongoing design development.

1.4 Status of the Statement of Common Ground

[1.4.1 This version of the SoCG has been prepared for Deadline 1 of the Examination. The SoCG will be updated throughout the Examination as discussions progress between the Parties and agreement is reached on matter. DNS have not yet had the opportunity to review the updated SoCG and provide a response and as such an updated position for the DNS on new progress items are not recorded in this version of SoCG.](#)

1.41.5 Terminology

[1.4.11.5.1 Section 3 summarises the issues that are 'agreed', 'not agreed' or are 'under discussion'.](#)

[1.4.21.5.2 These terms are used as follows:](#)

- “Agreed” indicates where the issue has been resolved;
- “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
- “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 has~~ taken place between the Parties in relation to the Application is outlined in ~~Table 1~~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~~Details of these meetings and key correspondence are set out in Table 1 below.

Table 1: Record of Engagement

Date	Form of Correspondence and Attendees	Key Topics Discussed and Key Outcomes
13 February 2024	Meeting – in person between both Parties	A meeting to introduce the Proposed Development and to provide a non-statutory consultation briefing by the Applicant to the DNS.
29 May 2024	Meeting – in person between both Parties	A meeting as part of the working group for both Parties to discuss the Proposed Development. Discussions were around temporary access being provided through construction, and permanent access routes following construction. Discussions were also in relation to ornithological interest of the Main Development Area.
24 October 2024	Meeting – in person between both Parties	A meeting to provide DNS with further updates on the Proposed Development. Also discussed were the proposed works for the Field study centre and bunded pools, as well as the National Grid re-cabling project.
<u>9 October 2025</u>	<u>Meeting – in person between both Parties</u>	<u>A meeting to provide DNS with a project update including further information on the habitats regulations assessment, ornithology baseline, proposed mitigation plans and DNS access to the Connah's</u>

Date	Form of Correspondence and Attendees	Key Topics Discussed and Key Outcomes
		<u>Quay Power Station nature reserve.</u>
<u>12 November 2025</u>	<u>Email from the Applicant to DNS</u>	<u>Follow up email to provide signposting to relevant DCO document for review and confirmation the Applicant will consider DNS comments on land enhancements and secure site access.</u>
<u>28 November 2025</u>	<u>Relevant Representation</u>	<u>DNS Relevant Representation was published on the Planning Inspectorate's Connah's Quay Low Carbon Power website.</u>

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 2-2: Areas of discussion between the Parties

Ref.	Subject	Relevant Application Document	Summary of DNS Comment within their Relevant Representation	Applicant Position	Deeside Naturalists Society Comment Position	Status	Likelihood of resolution
1	Temporary access to wildlife hides	Chapter 5: Construction Programme and Management (EN010166/and Programme [APP-043]) Framework /6.2.5)CEMP [APP-246].	Provision of alternative temporary DNS would like to ensure safe access is retained to the Connahs wildlife hides within the Connah's Quay Power Station Nature Reserve would be provided for the DNS during the construction- and operation of the Proposed development.	<p>The Applicant will continue to engage on this matter through the SoCG process.</p> <p>Paragraphs 5.6.17, 5.6.18, and 5.6.19 of Chapter 5: Construction Management and Programme [APP-043] explain how an alternative temporary access to the Connahs Connah's Quay Power Station Nature Reserve would be provided for the DNS members during the construction- phase of the Proposed Development, as well as how a permanent access road would be provided to access the bird hides during operation.</p> <p>The anticipated access during construction would continue from the Access to the Main Development Area, with a designated access road following the southern and western boundary of the ecological safeguard zone shown on Figure 5-3: Construction Areas [APP-0843]. This would minimise health and safety risks associated with the construction phase.</p> <p>-</p>	DNS agree with the proposed access arrangements during construction and operation of the Proposed Development.	Agreed	N/A Resolved
2	Permanent access	Chapter 5: Construction Programme and Management (EN010166/APP/6.2.5)	Provision of a permanent access road to maintain access to the bird hides during operation would be provided.	Provision of a permanent access road to maintain access to the bird hides during operation would be provided.		N/A	
3	Management of the Connahs Quay Nature Reserve	Chapter 11: Terrestrial and Aquatic Ecology (EN010166/APP/6.2.11) Outline Landscape and Ecological Management Plan (OLEMP) (EN010166/APP/6.9)	Ongoing management of the Connahs Quay Nature Reserve will be secured by the OLEMP (EN010166/APP/6.9).	Ongoing management of the Connahs Quay Nature Reserve will be secured by the OLEMP (EN010166/APP/6.9).	Agreed	N/A	
4-2	Adverse effects on birds using the Dee Estuary Special Area	Chapter 11: Terrestrial and Aquatic Ecology (EN010166/[APP/6.2.11-049]	DNS would like to ensure that adequate mitigation is included for the proposed mitigation for loss of functionally linked	The Applicant recognises the importance of curlew <i>Numenius arquata</i> as a qualifying feature of the Dee Estuary SPA/Ramsar designation. The scope of the terrestrial and aquatic ecology assessment is	This Statement of Common Ground does not cover all of the key points DNS has made during the	Under discussion	High

Ref.	Subject	Relevant Application Document	Summary of DNS Comment within their Relevant Representation	Applicant Position	Deeside Naturalists Society Comment	Status	Likelihood of resolution
	of Conservation, Special Protection Area and Ramsar siteMitigation for impacts on Curlew	Curlew Mitigation Strategy [APP-254] Outline LEMP (EN010166/APP/6.9), Construction Environmental Management Plan (CEMP) (EN010166/APP/6.5) Lighting Strategy (EN010166/APP/7.22)-2501	land ¹ associated with foraging Curlew during both construction and operation. The DNS support the provision of offsite and onsite habitat creation measures.	<p>appropriate and comprehensive and has been agreed with NRW.</p> <p>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.</p> <p>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).</p> <p>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 Applicant will continue to engage with the DNS (as well as NRW, the RSPB, and Natural England) on the Curlew Mitigation Strategy [APP-254] and opportunities to enhance existing habitat features within the Order limits for Curlew on completion of the construction of the Proposed Development detailed in the Outline LEMP [APP-250]. The Curlew Mitigation Strategy [APP-254] will be updated and submitted at an appropriate point during the examination. The Outline LEMP [APP-250] identifies that temporary laydown areas in the west of the Main Development Area outside of the</p>	<p>consultation process, though here, in summary, are two key issues:</p> <ul style="list-style-type: none">• DNS consider that a significant direct adverse impact on birds using the site is 'certain', rather than 'cannot be ruled out'. There is a wealth of data showing that the fields proposed for development are used by large numbers of foraging Curlew. This species is one of the qualifying migratory species for the Dee Estuary SPA/Ramsar designation.		

¹ Functionally Linked Land (FLL) is a term often used to describe areas of land or sea occurring outside a designated site which is critical to, or necessary for, the ecological or behavioural functions in a relevant season of a qualifying feature for which a Special Areas of Conservation (SAC), Special Protection Area (SPA) or Ramsar site has been designated. These habitats are frequently used by qualifying species and support the functionality and integrity of the designated sites for these features.

Ref.	Subject	Relevant Application Document	Summary of DNS Comment within their Relevant Representation	Applicant Position	Deeside Naturalists Society Comment Position	Status	Likelihood of resolution
				<p>operational footprint would be reinstated as grassland with shallow scrapes. Areas of tree and hedgerow planting are also shown in this area for Net Benefit for Biodiversity (NBB) purposes.</p> <p>The Applicant will continue to work with DNS to implement management within Compartment 1. Management of this area is detailed within the Conservation Areas Management Plan for the existing Connah's Quay Power Station. As detailed in Chapter 11: Terrestrial and Aquatic Ecology [APP-049], upon the end of management arrangements detailed within the Conservation Areas Management Plan existing Connah's Quay Power Station, an updated Conservation Areas Management Plan would be prepared and submitted to Flintshire County Council (FCC) and Natural Resources Wales (NRW) for approval prior to the commencement of operation. This updated Conservation Areas Management Plan would be reviewed and updated at a frequency to be agreed with FCC and NRW and would remain in place until the point of the completion of the decommissioning of the CQLCP Abated Generating Station.</p> <p>The Applicant is currently undertaking further ornithological surveys of the mitigation area at Gronant Fields, along with investigations and monitoring of groundwater and the sites hydrology. The requirement for further surveys, including for soil invertebrates and other biodiversity will be discussed and agreed with NRW and other statutory consultees.</p>	<ul style="list-style-type: none"> DNS consider that significant adverse impacts of disturbance effects from noise, lighting and human activity on birds using the Dee Estuary SPA/Ramsar site/SAC is 'highly likely' both during and after construction, rather than 'cannot be ruled out'. 		
3	Impact on internationally important Dee Estuary SSSI, SPA and Ramsar site.	Chapter 11: Terrestrial and Aquatic Ecology [APP-049] Chapter 9: Noise and Vibration [APP-047] Figure 5-3: Construction Areas [APP-083]	<p>DNS raise concerns about the impact of the development on the internationally important bird populations that use the saltmarsh and mudflats immediately adjacent to the proposed development.</p> <p>DNS have provided suggested management improvements for the existing Connah's Quay Nature reserve Compartment 2.</p>	<p>As stated in response to DNS2, for comments relating to the management of Compartment 2, the Applicant will continue to work with DNS to implement management under the Conservation Areas Management Plan for the existing Connah's Quay Power Station. The Applicant can confirm that the existing sluice will be re-instated as part of ongoing management and maintenance of Compartment 2.</p> <p>The approach to the noise assessment was discussed and agreed with NRW in May 2025. Section 5 of Chapter 9: Noise and Vibration [APP-047] explains</p>		Under discussion	High

Ref.	Subject	Relevant Application Document	Summary of DNS Comment within their Relevant Representation	Applicant Position	Deeside Naturalists Society Comment	Status	Likelihood of resolution
		Report to Inform the Habitats Regulations Assessment [APP-253] Framework CEMP [APP-246]	DNS are concerned that acoustic fences that are only 3m high will be insufficient for what they have to do (i.e. prevent as much noise disturbance to the riverside as is possible, given that the construction work may last for nine years). DNS note there will be a significant residual impact on Curlews that traditionally use the site as their ability to find alternative foraging area locally is likely to be limited.	how acoustic fencing would be implemented along the northern and western boundaries of the Main Development Area and along the northern boundary of the (C&IEA), as shown in Figure 5-3: Construction Areas [APP-083] . A height of 3 m is standard for acoustic fences based upon the main source of noise for construction plans which is typically the engines and generators. For other noise sources (e.g. piling) shrouds on the piles would be used as mitigation to address noise in accordance with the controls included in the Framework CEMP [APP-246] . Appendix D of the Report to Inform the Habitats Regulations Assessment [APP-253] illustrates noise levels after mitigation is applied. Works to install the acoustic fence would be undertaken outside of the wintering period, as presented in the Framework CEMP [APP-246] and no clearance works or site establishment works within the Main Development Area and (C&IEA) would occur between the October and March inclusive in the absence of the 3 m acoustic fencing. The final CEMP is to be prepared in general accordance with the Framework CEMP [APP-246] , and no stage of the authorised development may commence until the final CEMP is approved by the relevant planning authority pursuant to Requirement 4 of the Draft DCO [APP-019] . Regarding comments made on the loss of roosting and foraging habitat being assessed as Moderate or Major Adverse (Significant) , Chapter 25: Summary of Significant Likely Effects [APP-063] also demonstrates that, after the application of additional mitigation / enhancement, the residual effect would become Negligible or Minor Adverse (Not Significant) . Specifically regarding Curlew, the Applicant has addressed this concern above in DNS2 .			
4	Mitigation for noise and visual disturbance - Dee Estuary	Chapter 11: Terrestrial and Aquatic Ecology [APP-049] Chapter 9: Noise and Vibration [APP-047]	DNS are unclear if the proposed additional noise mitigation will be sufficient to mitigate the identified impacts.	The noise mitigation identified has been modelled to be effective, in that it would reduce noise levels to below the 60dB disturbance threshold used in the HRA and the 70dB disturbance threshold agreed with NRW. Published guidance	Under discussion	High	

Ref.	Subject	Relevant Application Document	Summary of DNS Comment within their Relevant Representation	Applicant Position	Deeside Naturalists Society Comment	Status	Likelihood of resolution
			<p>DNS would like to understand the proposed mitigation measures in more detail.</p> <p>DNS suggest that detailed monitoring is carried out in the first two years to assess the disturbance impacts when works commence.</p> <p>DNS also suggest that measures should be put in place to be reactive if disturbance issues are found to be significant. DNS members monitoring birds at the reserve may be able to provide evidence</p>	<p>exists regarding the benefit to be assumed from different types of mitigation.</p> <p>The Applicant is committed to undertaking monitoring of the abundance of wintering bird species following the methodology for the 2023 / 2024 Wetland Bird Counts detailed in Appendix 11-D: Ornithology Technical Appendix [APP-193]. The frequency of this monitoring during construction is to be discussed and agreed with FCC and NRW. In addition to this, the Framework CEMP [APP-246] notes Ecological Clerk of Works (ECoW(s)) would be appointed by the undertaker to manage the risks to ecology during construction, advising protecting valued biodiversity features and providing practical solutions. The appointed ECoW(s) would be appropriately qualified and a member of the Chartered Institute of Ecology and Environmental Management (CIEEM). The ECoW(s) would be able to monitor during periods of noisy activities to determine if certain activities require additional noise mitigation at source.</p>			
5	Impact on Deeside Naturalists members visiting the nature reserve	Chapter 5: Construction Management and Programme [APP-043]	<p>DNS note the core working hours and the potential need for working outside these</p> <p>DNS reiterate the importance of advance notification to DNS when work that may affect members visiting the reserve is undertaken outside core working hours.</p>	<p>Regarding communications, as detailed within the Framework CEMP [APP-246], a Community Liaison Group would be set up prior to construction and would continue until final commissioning of the Proposed Development as a formal forum for local issues to be raised. A Community Liaison Officer would be appointed to lead discussions with local communities and act as the primary point of contact, should there be any queries or complaints. The officer would develop a Stakeholder Communications plan to include measures for community engagements and track queries or complaints. The final CEMP(s) will include this control measure.</p>		Under discussion	High
6	Mitigation relating to Schedule 1 breeding birds	Chapter 11: Terrestrial and Aquatic Ecology [APP-049] Framework CEMP [APP-246]	<p>DNS request that appropriate provisions will continue to be made for nesting Peregrine and Little Ringed Plover, incorporating these needs within the new development.</p>	<p>Measures to prevent disturbance to Schedule 1 breeding birds during construction are detailed in the Framework CEMP [APP-246], secured via of the Draft DCO [APP-019].</p>	<p>DNS are satisfied that appropriate provisions for breeding birds during construction of the Proposed Development.</p>	Under discussion	High

Ref.	Subject	Relevant Application Document	Summary of DNS Comment within their Relevant Representation	Applicant Position	Deeside Naturalists Society Comment Position	Status	Likelihood of resolution
7	DCO Articles and Requirements	Draft DCO [APP-019]	N/A	The Draft DCO includes articles and requirements which are appropriate for the Proposed Development.	DNS has no objection to the drafting of the articles and requirements in the Draft DCO.	Agreed	N/A

4. Approvals

4.1 The Applicant

Signed: _____

Name: _____

Position: _____

Date: _____

4.2 Deeside Naturalist Society

Signed: _____

Name: _____

Position: _____

Date: _____

References

Stationery Office (2009). Th

Ref 1. . 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.

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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

