

## Connah's Quay Low Carbon Power

### **Draft Statement of Common Ground between Uniper UK Limited and National Highways**

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## Table of Contents

1. Introduction .....	1
1.1 Purpose of this Document .....	1
1.2 Parties to this Statement of Common Ground .....	1
1.3 The Proposed Development.....	2
1.4 Status of this Statement of Common Ground .....	3
1.5 Terminology .....	3
1.6 Record of Engagement .....	4
1.7 Areas of Discussion between the Parties .....	5

## Tables

Table 1: Record of Engagement.....	4
Table 2: Areas of Discussion with National Highways .....	6

# 1. Introduction

## 1.1 Purpose of this Document

- 1.1.1 This Draft Statement of Common Ground (SoCG) has been commissioned 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 accepted for examination on the 28<sup>th</sup> August 2025 and the Examination commenced on 13<sup>th</sup> January 2026.
- 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](https://www.gov.uk/government/consultations/connahs-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 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) National Highways (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<sub>2</sub> emissions by high-quality CO<sub>2</sub>-offsets.

#### **National Highways**

1.2.4 National Highways is responsible for operating, maintaining and improving the strategic road network in England and is a statutory undertaker in respect of its highway undertaking. While the strategic road network in Wales is managed by the Welsh Government, National Highways is a prescribed consultee in respect of DCO applications where proposals may affect routes connecting to the strategic road network in England. The Applicant has engaged with National Highways during the development of the Proposed Development to consider potential effects on the strategic road network, including matters relating to highway safety, capacity and the protection of highway assets.

## **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 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 (CO<sub>2</sub>) pipeline, comprising existing and new elements, the Proposed Development would make use of CO<sub>2</sub> 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<sub>2</sub> Pipeline Project'), that will transport CO<sub>2</sub> captured from existing and new industries in North Wales and North-West England, for offshore storage. The captured CO<sub>2</sub> 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 network in England and Wales, 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) [APP-042]**. 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 this Statement of Common Ground

1.4.1 This version of the SoCG has been prepared by the Applicant following the request of the ExA. The document will continue to be revised and updated as discussions progress during the Examination period.

## 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:

- "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.

## 1.6 Record of Engagement

1.6.1 A summary of all meetings and correspondence that has taken place between the Parties in relation to the Application to date 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
10 June 2025	Email	An email from the Applicant to provide National Highways with an update on the Proposed Development, confirm records have been updated for future correspondence, explain the statutory and non-statutory consultations including proposed stack height increases and other non-material changes, outline the revised project boundary and access/AIL transport strategy, and request a meeting to discuss feedback.
17 June 2025	Email	An email from National Highways to the Applicant to acknowledge receipt of documents, highlight potential impacts of construction traffic on the Strategic Road Network and nearby developments, outline the importance of managing AIL movements alongside other projects, and indicate that further comments and a potential meeting will follow once the review is complete.
01 July 2025	Email	An email from National Highways to the Applicant providing comments on the Proposed Development, covering the need for the Traffic Assessment to follow Department for Transport (DfT) guidance, review of baseline travel data and existing travel plans, inclusion of the Strategic Road Network (A550, A494, M56) in the study area,

Date	Form of Correspondence	Key topics discussed and key outcomes
		assessment of construction worker and HGV trips including AIL movements, consideration of demolition and peak-hour traffic, consultation on Framework CTMP and CWTP, use of latest data sources, and requests for evidence supporting assumptions on construction traffic impacts.
31 July 2025	Email	An email from the Applicant to National Highways providing a response to the comments raised on 01 July 2025.
24 October 2025	Relevant Representations	National Highway's Relevant Representation (RR-025) covered topics including the Strategic Road Network (SRN), staff travel patterns, and engagement undertaken with National Highways during the development of the framework Construction Workers Travel Plan (CWTP), framework Construction Traffic Management Plan (CTMP) and Decommissioning Traffic Management Plan (DTMP).
15 July 2026	Microsoft Teams Meeting	A meeting was held between the Applicant and National Highways to discuss the Issue Specific Hearings that took place in January 2026 as well as the National Highway's Relevant Representation (RR-025).

## 1.7 Areas of Discussion between the Parties

1.7.1 **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 National Highways**

Ref	Subject	Relevant Application Document	National Highways Comment	Applicant's position	Status	Likelihood of Resolution
<b>1.0 Traffic and Transport</b>						
1.1	Consideration of the Strategic Road Network (SRN)	<b>Chapter 10: Traffic and Transport [APP-048]</b> <b>Transport Assessment [APP-188]</b>	<p><b>National Highway's Relevant Representation (RR-025) – NH2<sup>1</sup></b></p> <p>Reference to and consideration of DfT Circular 01/2022 within the TA in relation to the Strategic Road Network (SRN).</p> <p>The study area within the ES does not include the SRN.</p> <p>National Highways does not accept the Applicant's statement relating to the percentage impact on the A548 as relevant or sufficient evidence upon which to judge the potential impact on the SRN. It is our position that even small percentage increases in demand on the SRN can lead to congestion and safety concerns if flows are significant enough.</p> <p>We therefore expect applicants to show the number of expected trips rather than a percentage increase and to determine how the</p>		Under discussion	High

<sup>1</sup> NH2 refers to the reference number found in Applicant's Response to Relevant Representations (Document Ref. 9.4)

Ref	Subject	Relevant Application Document	National Highways Comment	Applicant's position	Status	Likelihood of Resolution
			distribution of these trips would impact affected junctions through site specific assessments.			
1.2	Consideration of the SRN – assumption on construction vehicle movements	Chapter 10: Traffic and Transport [APP-048]	<p><b>National Highway's Relevant Representation (RR-025) – NH5</b></p> <p>National Highways request further detail on the construction trips that may use the SRN, based on a range of realistic worst-case assumptions.</p>		Under discussion	High
1.3	Consideration of the SRN – Collision Data	Chapter 10: Traffic and Transport [APP-048]	<p><b>National Highway's Relevant Representation (RR-025) – NH7</b></p> <p>National Highways request this data be considered for the SRN links and junctions which may carry construction traffic, specifically the M56, A550, A494, A55 and M53.</p>		Under discussion	High
1.4	Consideration of the SRN – Abnormal Indivisible Loads (AIL) movements from Ellesmere Port	Chapter 10: Traffic and Transport [APP-048]	<p><b>National Highway's Relevant Representation (RR-025) – NH8</b></p> <p>The exact number and size / weight of AILs would be determined at detailed design stage and would be based on specific construction methodologies that will be confirmed during this stage. Further technical assessments by specialist AIL transport contractors will be required at that stage.</p>		Under discussion	High

Ref	Subject	Relevant Application Document	National Highways Comment	Applicant's position	Status	Likelihood of Resolution
1.5	Optional staff travel patterns		<p><b>National Highway's Relevant Representation (RR-025) – NH3</b></p> <p>There is not anticipated to be a material change in staff travel patterns during the operation phase, which is accepted.</p>		Agreed	Resolved
1.6	Development of the framework CWTP	<b>Chapter 10: Traffic and Transport [APP-048]</b> <b>Framework CWTP [APP-248]</b>	<p><b>National Highway's Relevant Representation (RR-025) – NH3</b></p> <p>National Highways request consultation on the development of the framework CWTP. This request also extends to consultation required in support of discharge of Requirement 19 of the <b>draft DCO [APP-019]</b>.</p>		Under discussion	High
1.7	Development of the framework CTMP	<b>Chapter 10: Traffic and</b>	<p><b>National Highway's Relevant Representation (RR-025) – NH9</b></p> <p>National Highways request consultation on the development of the framework CTMP. This</p>		Under discussion	High

Ref	Subject	Relevant Application Document	National Highways Comment	Applicant's position	Status	Likelihood of Resolution
		<b>Transport [APP-048]</b>  <b>Framework CMTP [APP-247]</b>	request also extends to consultation required in support of discharge of Requirement 19 of the <b>draft DCO [APP-019]</b> .			
1.8	Development of any future DTMP	<b>Chapter 10: Traffic and Transport [APP-048]</b>	<b>National Highway's Relevant Representation (RR-025) – NH9</b>  National Highways request consultation on the development of any future DTMP.		Under discussion	High
1.9	Trip generation and mode split	<b>Chapter 10: Traffic and Transport [APP-048]</b>	<b>National Highway's Relevant Representation (RR-025) – NH6</b>  The TA has assumed all construction worker trips would be made by car modes, with an assumed occupancy of 2.33 per vehicle. This is agreed in principle; however National Highways would wish to be consulted upon any further changes which may affect the number of construction worker car trips such as the use of minibuses or changes in the level of proposed parking.		Under discussion	High
1.10	Cumulative assessment	<b>Chapter 24: Combined and Cumulative Effects [APP-063]</b>	<b>National Highway's Relevant Representation (RR-025) – NH10</b>  National Highways requested the Applicant sets out further rationale relating to the consideration of relevant developments and that they consult with Cheshire West and Chester Council (CWaC)		Under discussion	High

Ref	Subject	Relevant Application Document	National Highways Comment	Applicant's position	Status	Likelihood of Resolution
			<p>to confirm any additional sites within their boundary which should be considered.</p> <p>National Highways is aware of various DCOs and other major planning applications which are likely to impact on the SRN in the vicinity of Ellesmere Port and Chester, specifically the M53, M56, A550, A55 and A494. This is a sensitive part of the network particularly during peak periods of activity at Cheshire Oaks, when special traffic management plans are activated to manage congestion at M53 Junction 10. It is requested that the Applicant consider the construction impacts of the following applications as part of their cumulative assessment for construction traffic, along with any additional developments which may be identified by CWaC:</p> <ul style="list-style-type: none"> <li>• HyNet Hydrogen</li> <li>• HyNet Carbon Dioxide</li> <li>• Mersey Tidal Power</li> <li>• Stanlow CHP</li> <li>• Frodsham Solar</li> <li>• Hob Lane Solar Farm</li> <li>• Runcorn Spur Pipeline</li> </ul>			

Ref	Subject	Relevant Application Document	National Highways Comment	Applicant's position	Status	Likelihood of Resolution
			<ul style="list-style-type: none"> <li>• Protos CCP</li> <li>• A494 River Dee Bridge replacement scheme</li> </ul>			
1.11	<b>Chapter 10: Traffic and Transport [APP-048]</b> <b>Framework CMTP [APP-247]</b>		<p><b>National Highway's Relevant Representation (RR-025) – NH13</b></p> <p>National Highways will require any detailed CTMP and CWTP to take the following into account:</p> <ol style="list-style-type: none"> <li>1. Any commitments regarding the routing and arrival / departure times of construction vehicles, including AILs, should be secured through a final CTMP.</li> <li>2. The study area considered for the TA and CTMP must be extended to include the SRN, specifically the M53, M56, A55, A550 and A494.</li> <li>3. National Highways would strongly recommend that the final CTMP contain a detailed construction staff trip monitoring methodology which will provide detail on how the adherence to any secured staff shift periods / movements will be monitored, in addition to detail as to what adjustive / remedial measures will be implemented should construction movements be considered to materially</li> </ol>		Under discussion	High

Ref	Subject	Relevant Application Document	National Highways Comment	Applicant's position	Status	Likelihood of Resolution
			<p>breach any imposed shift period movement restriction.</p> <p>4. National Highways request that the final CTMP includes a firm commitment relating to collaboration with the developers of nearby developments in order to minimise impacts on the SRN.</p>			
1.12	Articles and Schedules	<b>Draft DCO [APP-019]</b>		The wording of the Articles and Schedules in the <b>Draft DCO [APP-019]</b> is appropriate.	Under discussion	High

