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To: [Connahs Quay](#)
Subject: Representation regarding EN010166 - Connah's Quay Low Carbon Power Project
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I write to make a representation regarding the application for the Connah's Quay Low Carbon Power Project. While I do not object to the principle of new low-carbon power generation, I object to the applicant's Combined Heat and Power (CHP) Readiness Assessment.

The assessment relies on regulatory conflations and contradictory data to avoid delivering community benefits. My specific objections are as follows:

1. **Conflation of Permitting and Planning Regimes** In Section 3.5.1, the applicant argues that because the project does not meet the "High Efficiency CHP" threshold (10% Primary Energy Saving) defined in the EU Energy Efficiency Directive, a Cost-Benefit Analysis (CBA) is not required. This is a misapplication of Environmental Permitting rules to satisfy a Planning requirement. NPS EN-1 (designated 2024), paragraph 4.8.12, requires applicants to demonstrate that CHP is not "economically or practically feasible". There is no provision in NPS EN-1 that waives this requirement based on a specific efficiency percentage. By failing to undertake a CBA for the identified opportunities, the applicant has failed to explain why CHP is not economically feasible.
2. **Economic Viability and Essentially Free Heat** Sections 3.2.7 and 3.2.8 confirm that the plant produces waste heat from the Carbon Capture Plant's CO₂ stripper overheads and reboiler condensate. Currently, the applicant proposes to reject this heat into cooling systems. Since this energy is a byproduct that must be cooled if not used, it is essentially free heat. The economic assessment should be based on the cost of distribution infrastructure versus the revenue from heat sales, with a zero (or negative, due to avoided cooling) cost of generation.
3. **Contradiction Regarding Intermittency and Run Profiles** In Section 3.4.4, the applicant dismisses CHP viability by claiming the plant will operate intermittently. However, in their own heat availability calculations (Table 4 and Table B-10), they base their figures on an assumption of 6,000 operational hours per year. 6,000 hours represents a 68% capacity factor, which constitutes a significant baseload. Relying on a high-availability figure that presumably underpins the business case while simultaneously pleading intermittency to avoid building a heat network is unsound. Furthermore, standard thermal storage is a mature solution to bridge dispatchable generation gaps.

4. Unjustified Dismissal of Industrial Heat Grades The applicant suggests that industrial users may require high temperature heat that the network cannot provide. However, Section 3.2.7 explicitly states that the CO2 stripper overhead stream exits at 120°C. With a source temperature of 120°C, achieving a distribution temperature suitable for industrial or district heating is technically straightforward, relying on performing a cost benefit analysis to size the heat exchangers for an appropriate district heating flow temperature. Dismissing industrial loads without engaging the operators to confirm their temperature requirements and the value of heat suggests a lack of serious technical appraisal.

5. Misrepresentation of Historic Viability Thresholds In Section B.5.9, the applicant cites a 2009 DECC report ("Potential and costs of district heating networks"), and in Section B.5.10 uses this as a threshold for heat network viability (heat demand exceeds 200 MWth within 15km). This is a misapplication of guidance. The 200 MWth within 15km example in the 2009 report was illustrative of a large-scale scheme, not a threshold for economic viability. Misuse of this example allows the applicant to dismiss the significant aggregated demand they identified which might otherwise form a viable network.

6. Failure to Consider Heat Network Zoning and Local Planning The assessment dismisses potential heat loads (such as the Northern Gateway) as risky due to the need to secure private contracts. This fails to account for the emerging policy landscape of Heat Network Zoning and Local Area Energy Planning (LAEP). As the UK moves towards zoning, connection for large non-domestic and public sector buildings in designated zones will likely become mandatory or strongly regulated, removing the demand risk the applicant cites. The applicant has failed to demonstrate suitable engagement with Flintshire Council's energy planning teams to align this project with future heat zones.

7. Invalid Physical Barrier Constraints In Section B.5.3, the applicant claims the River Dee is a "major physical barrier" preventing connection to the Deeside Industrial Park. This ignores the existence of the Flintshire Bridge (A548), which connects the site directly to the industrial park. Retrofitting district heating pipes onto existing bridges is a standard engineering practice. Relying on a bridged river as a primary constraint indicates a conservative approach that prioritises identifying constraints over exploring solutions.

Conclusion The applicant has identified massive heat availability (up to 138 MWth in Phase 2) and significant nearby heat loads yet has failed to perform a CBA or engage meaningfully with stakeholders. I submit that the Examination should require the applicant to revisit this assessment to ensure compliance with NPS EN-1.

Kind regards,

Asa Briggs

