



**Deadline 3 response for the Application by Uniper UK Limited for an Order granting Development Consent for the  
Connah's Quay Low Carbon Power Project Planning Inspectorate Reference Number: EN010166**

**National Highways' comments ExA's Written Questions issued 17 February 2026**

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<b><u>ExQ1</u></b>	<b><u>Question</u></b>	<b><u>National Highway's response</u></b>
Q8.2	<p><b>Timings of traffic counts</b></p> <p>It is noted that traffic counts to assess the background levels of traffic at the site were undertaken in March and April only. Can the applicant advise how these figures might vary at other times of the year and whether they would cover any peak movements associated with holiday season or other seasonal peak points for the region and locality, such as large scale outdoor events</p>	<p><i>The traffic counts referred to relate to the local road network rather than the Strategic Road Network in England. Therefore National Highways have no comments on these.</i></p> <p><i>It is further noted that the Applicant has now issued "Topic Paper: Further Consideration of Construction Traffic on the SRN within England – Response to RR-025" (REP1-063). National Highways are broadly in agreement with the content of this Topic Paper and are actively engaged with the Applicant in agreeing updates to the Framework Construction Traffic Management Plan (REP 1-026) in order to ensure that construction impacts on the SRN in England will be appropriately managed, taking into account prevailing traffic conditions.</i></p> <p><i>National Highways are collaborating with the Applicant on the drafting a Statement of Common Ground in which the formal responses will be documented. It is anticipated that all matters will be agreed before the end of the Examination.</i></p>
Q8.3	<p><b>HGV movements on local road network ([APP-048] Ref: 6.2.10 Table 10.19)</b></p> <p>What mitigation has the applicant considered to reduce and distribute the movement of HGV movements around the road and junctions along Kelsterton Road?</p>	<p><i>As the local routes are not the responsibility of National Highways, we cannot comment on this point.</i></p>

Q8.4	<p><b>Increase in traffic movements ([APP-048] Ref: 6.2.10.7.1)</b>          What evidence is there for the applicant's' conclusion that no mitigation is required for the increase in traffic movements on the local road network?</p>	<p><i>As the local routes are not the responsibility of National Highways, we cannot comment on this point.</i></p>
Q22.2	<p><b>Traffic and transport</b>          How does the general growth trend included in traffic make allowance for the potential schemes in the vicinity of the proposed development and associated increased traffic coinciding with any proposed development at the site?</p> <p>In particular with regards to cumulative effects potential at:          During construction:</p> <ul style="list-style-type: none"> <li>• Residential properties West end of Kelsterton Road (including the travellers' encampment);</li> <li>• Kelsterton farm;</li> <li>• Residential properties at Kelsterton lane / Kelsterton road intersection; and</li> <li>• Residential properties close to Spar shop on Chester road.</li> </ul>	<p><i>As the local routes are not the responsibility of National Highways, we cannot comment on this point.</i></p>

	<p>During operation:</p> <ul style="list-style-type: none"> <li>• Residential properties West end of Kelsterton road.</li> </ul>	
Q24.9	<p><b>Abnormal indivisible load routes</b></p> <p>It is proposed to take temporary possession of three alternative highway routes for the movement of abnormal indivisible loads.</p> <p>What is the justification for requiring these powers other three route options and why cannot a single route be defined?</p> <p>Also, what is the justification for using the powers in the dDCO for this purpose rather than the more frequently used permitting options provided by existing legislation and the general powers that will be provided under streets within the dDCO?</p>	<p><i>It is National Highways' understanding that the Applicant will not be looking to take possession of routes for their AILs, but rather will simply be using the roads whilst they are open for traffic. Additionally, National Highways has a defined process for booking space for AILs through Electronic Service Delivery for Abnormal Loads (ESDAL). This system will ensure that there is sufficient capacity on the network at the time the booking is needed and it will remain a requirement for the Applicant throughout the construction phase.</i></p> <p><i>It is for this reason that National Highways considers it acceptable that abnormal load routes are not strictly defined at this stage, as there may be a need for flexibility on routing to ensure the continued safe operation of the Strategic Road Network in England.</i></p>