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Connah's Quay Low Carbon Power

Draft Statement of Common Ground between Uniper UK Limited and Scottish Power Energy Networks Holdings Limited for SP Manweb plc (Tracked)

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1. Introduction

1.1 Purpose of this Document

- 1.1.1 This Statement of Common Ground (SoCG) has been prepared to support the application (the Application) for the Connah's Quay Low Carbon Power Project (the Proposed Development) made by Uniper UK Limited (the Applicant). 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.
- 1.1.2 This SoCG does not seek to replicate information which is available elsewhere within the Application documents.
- 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 SoCG will be revised and updated as appropriate and/or required by the ExA at relevant examination deadlines.
- 1.1.4 ~~Whilst a~~ version of this SoCG was shared with Scottish Power Energy Networks Holdings Limited and comments ~~invited~~provided ahead of Deadline 1, ~~Scottish Power Energy Networks has not yet provided its input on the updated Scottish Power Energy Networks position recorded below. However, the SoCG will be updated throughout the Examination as discussions progress between the Parties and agreement is reached on matters~~3, which have been incorporated into this draft.

1.2 Parties to this Statement of Common Ground

- 1.2.1 This SoCG has been prepared between (1) the Applicant and (2) Scottish Power Energy Networks Holdings Limited (SPEN) acting for SP Manweb plc (SPM) (jointly referred to as the Parties).
- 1.2.2 SPM has apparatus within or adjacent to the Order limits for the Proposed Development.
- The Applicant:**
- 1.2.3 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 around 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.

- 1.2.4 Uniper is committed to investing around €8 billion (~£6.9 billion) in growth and transformation projects by the early 2030s and aims to be carbonneutral 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 CO2 emissions by high-quality CO2-offsets.

SPM:

- 1.2.5 SPM is a distribution network operator of electricity throughout ~~Central and Southern Scotland~~, North Wales, Merseyside, Cheshire and North Shropshire.
- 1.2.6 The Application includes provisions which would, if granted, authorise the Applicant to carry out works in and in close proximity to land and assets belonging to SPM and to use such land temporarily and to acquire permanent interests in such land.

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)**. 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 Terminology

- 1.4.1 Section 3 summarises the issues that are 'agreed', 'not agreed' or are 'under discussion'.
- 1.4.2 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 ongoing 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 has taken place between the Parties in relation to the Application 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 and Attendees	Key Topics Discussed and Key Outcomes
7 January 2025	Email from the Applicant to SPM	Sharing a copy of the protective provisions to be included in Part 1 of the draft DCO.
27th January 2025	Call between the Applicant and SPM	Discussion of what Scottish Power's preferred protective provisions would be.
25 March 2025	Call between AECOM (acting for the Applicant) and SPM	Discussion over the provision of plans showing the interface between Scottish power apparatus and the Proposed Development.
9th May 2025	Email from AECOM to SPM	2nd draft of protective provisions plans provided requesting Scottish Power update the symbology table.
13th May 2025	Email from SPM to AECOM	Providing Scottish Power's asset plans.
14th May 2025	Email from AECOM to SPM	Correspondence regarding the symbology of assets shown on the plans.
19th May 2025	Email from SPM to AECOM	Making amendments to the plans.
29th May 2025	Email from AECOM to SPM	Sent updated plans with changes made for approval.
3 rd June 2025	Email from the Applicant to SPM	Requesting confirmation that the Protective Provision Plans are now agreed
3 rd June 2025	Email from SPM to the Applicant	Requesting changes to the Draft 2 Plans

Date	Form of Correspondence and Attendees	Key Topics Discussed and Key Outcomes
12 th June 2025	Email from AECOM to SPM	Provided updated Plans to SPM incorporating changes requested for approval
13 th June 2025	Email from the Applicant to SPM	Draft SoCG circulated for input and/or approval
23 rd June 2025	Email from SPM to the Applicant	Draft SoCG shared with SPM input for approval
23 rd June 2025	Email from the Applicant to SPM	Updated draft SoCG incorporating SPM amends and sent back and approval requested for plans sent on the 12 th June to SPM.
23 rd June 2025	Email from SPM to the Applicant	Updated draft SoCG returned with SPM signature
16 th July 2025	Email from the Applicant to SPM	Draft Protective Provisions circulated for review and request for solicitor details to be shared
17 th July 2025	Email from SPM to the Applicant	Confirmation that the protective provisions fall in line with what has been previously agreed on other DCOs and then once submitted to the ExA SPM will update the ExA that these are agreed. Link to H&S policies provided.
17 th July 2025	Email from the Applicant to SPM	Thanking for providing acceptance of the protective provisions
9 th September 2025	Email from SPM to the Applicant	Requesting Plans of the SPM network submitted as part of the DCO
15 th September 2025	Email from the Applicant to SPM	Uniper re-circulated previous email sent via AEOM on the 12 th June 2025 with updated plans
23 rd September 2025	Email from SPM to the Applicant	Confirmation that plans require tweaking and requesting links to submitted protective provisions and SoCG

Date	Form of Correspondence and Attendees	Key Topics Discussed and Key Outcomes
2 nd October 2025	Email from the Applicant to SPM	Link to the Plans, SoCG and protective provisions shared with SPM, and asked for confirmation that protective provisions were previously agreed.
17 th October 2025	Email from SPM to the Applicant	Request for Plans to be incorporated and link to CEMP to be shared.
27 th October 2025	Email from the Applicant to <u>SMPSPM</u>	Confirming that the request regarding the protective provisions had been shared with the Applicant's solicitors
20 th November 2025	Email from the Applicant to <u>SMPSPM</u>	Legal confirmed that unlikely the CEMP will include reference to <u>SMPSPM</u> apparatus due to protective provisions which cover this matter, which we understood were previously agreed
10 th December 2025	Email from the Applicant to <u>SMPSPM</u>	Requesting clarity on whether the protective provisions had been previously agreed, as communicated
15 th December 2025	Email from <u>SMPSPM</u> to the Applicant	Accepting that any impacts can be managed through the protective provisions and requesting confirmation that any references to SP Manweb confirm SPEN as managing their assets
15 th December 2025	Email from the Applicant to <u>SMPSPM</u>	Querying why the protective provisions are not agreed and confirming that SP Manweb are only listed as asset owner so protective provisions should not need updating as they are drafted to that respect
17 th December 2025	Email from <u>SMPSPM</u> to the Applicant	Confirming relevant representation is necessary

Date	Form of Correspondence and Attendees	Key Topics Discussed and Key Outcomes
		to make any changes and SMP would not remove 'objection' until final DCO submitted.
17 th December 2025	Email from the Applicant to <u>SMP</u> <u>SPM</u>	Confirming that it is fine for <u>SMP</u> <u>SPM</u> to retain its representation throughout the examination stage.
17 th December 2025	Call from <u>SMP</u> <u>SPM</u> to the Applicant	Detailing that they may now have comments on the previously agreed the protective provisions because they are learning from previous DCOs
17 th December 2025	Email from <u>SMP</u> <u>SPM</u> to the Applicant	Confirming points of the call as above in writing
18 th December 2025	Email from the Applicant to <u>SMP</u> <u>SPM</u>	Confirmation that the drafting of protective provisions will remain the same for and SP Manweb
<u>23rd December 2025</u>	<u>Email from the Applicant to SPM</u>	<u>Updated Statement of Common Ground shared for review and comment</u>
<u>14th January 2026</u>	<u>Email from the Applicant to SPM</u>	<u>Chasing for a response to the Statement of Common Ground issued</u>
<u>21st January 2026</u>	<u>Email from the Applicant to SPM</u>	<u>Chasing for a response to the Statement of Common Ground issued</u>
<u>23rd January 2026</u>	<u>Email from the Applicant to SPM</u>	<u>Chasing for a response to the Statement of Common Ground issued</u>
<u>4th February 2026</u>	<u>Email from SPM to the Applicant</u>	<u>Requesting minor changes to the wording within the DCO to be updated for Deadline 3 and Statement of Common Ground agreed</u>
<u>11th February 2026</u>	<u>Email from the Applicant to SPM</u>	<u>Confirming these changes had been made</u>
<u>27th February 2026</u>	<u>Email from SPM to the Applicant</u>	<u>Requesting further minor changes to the wording within the DCO to be updated for Deadline 3</u>
<u>3rd March 2026</u>	<u>Email from the Applicant to SPM</u>	<u>Requesting whether Protective Provisions can</u>

Date	Form of Correspondence and Attendees	Key Topics Discussed and Key Outcomes
		<u>be updated to agreed and Statement of Common Ground issued to that effect</u>
<u>3rd March 2026</u>	<u>Email from SPM to the Applicant</u>	<u>Confirming Protective Provisions are agreed and the Statement of Common Ground can be issued for approval</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: Areas of discussion between the Parties

Ref.	Subject	Relevant Application Document	Applicant Position	SPM Position	Status	Likelihood of resolution
1	Protective Provisions	Draft DCO (EN010166/APP/3.1)	The Draft DCO should include provisions for the protection of SPM.	The Draft DCO should include provisions for the protection of Scottish Power.	Agreed	N/A
2	Protective Provisions	Draft DCO (EN010166/APP/3.1)	The drafting of the protective provisions on the face of the Draft DCO (EN010166/APP/3.1) are agreed with SPM.	The drafting of the protective provisions on the face of the Draft DCO (EN010166/APP/3.1) are agreed, subject to ongoing review regarding lessons learned from other DCOs.	Under discussion Agreed	High
3	DCO Articles and Requirements	Draft DCO (EN010166/APP/3.1)	The Draft DCO includes articles and requirements which are appropriate for	Scottish Power has no objection to the drafting of the	Agreed	N/A

Ref.	Subject	Relevant Application Document	Applicant Position	SPM Position	Status	Likelihood of resolution
			the Proposed Development.	articles and requirements in the Draft DCO.		

4. Approvals

4.1 The Applicant

Signed: _____

Name: _____

Position: _____

Date: _____

4.2 SPEN (SP Manweb plc)

Signed: _____

Name: _____

Position: _____

Date: _____

