

Date: 31 March 2026
Our ref: 543692, Case 32959
Your ref: EN010166



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BY EMAIL ONLY

Dear ██████████

Connah's Quay Low Carbon Power Project; EN010166

Natural England's submission for Deadline 4 in respect of the Connah's Quay Low Carbon Power Project, promoted by Uniper, and responses to the outstanding Examiner's 1st Questions, published on 17th February 2026

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

We have provided comment on the documents submitted for Deadline 3 which are relevant to our remit. These are provided at Annex 1.

We also provide our responses to the Examiner's 1st Questions where we were identified as a respondent, but deferred answering at Deadline 3 due to the imminent submission of an updated air quality assessment by the applicant. These are set out at Annex 2.

Since Deadline 1 we have been in discussion with Uniper and their consultants regarding the Statement of Common Ground. The latest version, which we expect to be submitted by Uniper, includes our updated position on the issues raised in our Relevant Representations following these discussions. Our updated positions on several of these issues also reflect our position regarding impacts to designated sites primarily affecting Wales, as set out in Annex 1 of our Deadline 2 submission.

For any further advice on this consultation please contact the case officer Andrew Whitehead and copy to consultations@naturalengland.org.uk.

Yours sincerely

████████████████████
Principal Officer
Major Planning Casework Team

Annex 1 – Comment on documents submitted at Deadline 3

Report to Inform a Habitats Regulations Assessment (RIHRA)

We note that the RIHRA has been updated to reflect the changes to the air quality assessment. Given these changes are minimal and make no material difference to the conclusions reached, we refer the Examining Authority to our Relevant Representations and the latest version of the Statement of Common Ground for our outstanding concerns regarding the RIHRA.

Our position remains unchanged – we do not consider the proposed measures to address the impacts from nitrogen deposition across the designated saltmarsh of the Dee Estuary to be sufficient.

Furthermore, we maintain that the measures proposed to offset loss of designated saltmarsh within the Dee Estuary SAC from the new cooling water outflow, and to address the loss of functionally linked land supporting birds associated with the Dee Estuary SPA and Ramsar site should be considered compensation rather than mitigation.

Saltmarsh Creation Strategy

We welcome the production of the Saltmarsh Creation Strategy to ensure the proposed managed realignment delivers the maximum environmental outcomes.

We note that this work is intended to compensate for the loss of designated saltmarsh habitat to be lost for the cooling water outflow, and to mitigate for the additional nitrogen deposition to designated saltmarsh once the site is operational.

As this site lies within Wales we defer to NRW's advice in relation to the detailed design of this area to compensate for the saltmarsh loss.

Updated Air Quality Assessment

We have reviewed the updated Air Quality assessment submitted at Deadline 3, and have the following comments:

- The update does not materially change the overall position.
- The reduction in stack height is noted, but there is limited explicit comparison of pre- and post-change impacts at ecological receptors.
- In-combination assessment has been improved slightly, but still lacks full clarity, particularly in relation to ammonia and the completeness of sources included.
- The ammonia assessment remains close to relevant thresholds in places, and there is still some uncertainty around how background concentrations have been represented.

Annex 2 – Examiner’s Questions

Question No.	Question	Natural England’s Response
Habitats Regulations Assessment		
<p>Q1.6.10</p>	<p>HRA: Air quality modelling Are NE and NRW satisfied with the air quality modelling that has been undertaken (ES appendix 8-D [APP-183]) to inform the assessment of atmospheric pollution on European sites?</p>	<p>Natural England has reviewed the updated air quality modelling and supporting information. The updated material provides additional clarity in places, including the presentation of scenarios and reporting of ecological receptors.</p> <p>However, the update does not materially change the assessment outcomes or fully address the points previously raised in Natural England’s Relevant Representation. Natural England’s position therefore remains broadly as previously stated, with ongoing discussions focused on a small number of areas including in-combination assessment of nitrogen deposition and ammonia in relation to ecological receptors.</p>
<p>Q1.6.15</p>	<p>HRA: River Dee and Bala Lake SAC – Atmospheric pollution exhaust emissions Are NE satisfied with the applicant’s conclusion that the critical levels of ammonia (NH₃) and nitrogen (NO_x) would not be exceeded at River Dee and Bala Lake SAC during both construction and operation of the proposed development? If not, what further evidence is required for the applicant to justify their conclusion?</p>	<p>Natural England notes the applicant’s conclusion that critical levels for ammonia and nitrogen oxides would not be exceeded.</p> <p>At this stage, Natural England considers that the updated information does not materially alter the conclusions previously presented and does not change its position. As such, Natural England is not yet in a position to confirm agreement with the applicant’s conclusions.</p>
<p>Q1.6.17</p>	<p>Atmospheric pollution at internationally designated sites – Construction Are NE satisfied that the concerns raised in ID NE35 of their relevant representation [RR-026] have been addressed in ES chapter 8, table 8-5 [APP-046]?</p>	<p>Natural England acknowledges that updates have been made to the air quality assessment and supporting documentation.</p> <p>However, the updated material does not fully address the concerns previously raised in Natural England’s Relevant Representation. Our position therefore remains unchanged at this stage.</p>