



Connah's Quay Low Carbon Power

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

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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 28th August 2025 and the Examination commenced on 13th 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](#)
- 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 examination period 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 CO₂ emissions by high-quality CO₂-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 (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 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 in consultation with National Highways. In accordance with a meeting on 9 March 2026 held between the parties, where it was agreed that this revision of the SoCG, submitted at Deadline 4 would include an updated position from National Highways, this SoCG contains an updated position demonstrating progress on key issues. 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:
- a. "Agreed" indicates where the issue has been resolved;
 - b. "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
 - c. "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 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,

Date	Form of Correspondence	Key topics discussed and key outcomes
		A494, M56) in the study area, 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 January 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).
9 March 2026	Microsoft Teams Meeting	A meeting was held to discuss Topic Paper Further Consideration of Construction Traffic on the SRN within England - Response to RR-025 [REP1-062] , additional comments National Highways have on the Framework CTMP [REP1-025] and the SoCG.
24 March 2026	Email	An updated Draft SoCG was sent by National Highways to the Applicant which included their latest position. This position is

Date	Form of Correspondence	Key topics discussed and key outcomes
		recorded within the 'Position at Deadline 4' column of Table 2 .

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 with National Highways

Ref	Subject	Relevant Application Document	National Highways Comment	Applicant's position	Position at Deadline 4	Status	Likelihood of Resolution
1.1	Consideration of the Strategic Road Network (SRN)	Chapter 10: Traffic and Transport [APP-048] Transport Assessment [APP-188]	<p>National Highway's Relevant Representation (RR-025) – NH2¹ 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 distribution of these trips would impact affected junctions through site specific assessments.</p>	<p>The SRN has been included and assessed within Appendix 10-A: Transport Assessment (TA) [APP188] and Section 10.6 of Environmental Statement (ES) Chapter 10: Traffic and Transport [APP-048]. Use of professional judgement determined that that a significant impact was unlikely to occur on the SRN within England. Notwithstanding this, to provide further information Section 2 of Topic Paper: Consideration of Construction Traffic and SRN Impacts within England: Response to RR-025 [REP1-062] sets out an expanded study area, incorporating a wider network of SRN links. The SRN links are subsequently assessed for impacts during the temporary construction phase within Section 3.4.</p> <p>The assessments carried out for the assumption of construction traffic impacts have comprised worst case assumptions throughout, this approach is considered robust and exceeds any realistic scenario forecasts. This has been addressed in more detail within Section 3.4 of Topic Paper: Consideration of Construction Traffic and SRN Impacts within England: Response to RR-025 [REP1-062] and has been informed by discussions between the Applicant and National Highways.</p>	<p>The additional information provided has been reviewed by National Highways and is now considered sufficient in order to judge the impact of the development on the SRN in England.</p> <p>Updates have been made to the Framework CTMP (EN010166/APP/6.6) in order to ensure that construction traffic impacts on the SRN in England can be appropriately managed, including a commitment by the Applicant to engage in transport working groups.</p>	Agreed	Resolved
1.2	Consideration of the SRN – assumption on construction vehicle movements	Chapter 10: Traffic and Transport [APP-048]	<p>National Highway's Relevant Representation (RR-025) – NH5 National Highways request further detail on the construction trips that may use the SRN, based on a range of realistic worst-case assumptions.</p>	<p>The study area for collision history analysis included the SRN, in the form of the A548 which was deemed to be affected, and which falls under the jurisdiction of the North and Mid Wales Trunk Road Authority (NMWTRA). However, in order to provide the further information sought by National Highways an expanded collision data study area has been set out at Section 4 of Topic Paper: Consideration of Construction Traffic and</p>	<p>The additional information provided has been reviewed by National Highways and is considered to present a range of realistic worst-case assumptions in relation to construction traffic.</p>	Agreed	Resolved
1.3	Consideration of the SRN – Collision Data	Chapter 10: Traffic and Transport [APP-048]	<p>National Highway's Relevant Representation (RR-025) – NH7 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>	<p>which was deemed to be affected, and which falls under the jurisdiction of the North and Mid Wales Trunk Road Authority (NMWTRA). However, in order to provide the further information sought by National Highways an expanded collision data study area has been set out at Section 4 of Topic Paper: Consideration of Construction Traffic and</p>	<p>The additional collision data information provided has been reviewed by National Highways and is agreed.</p>	Agreed	Resolved

¹ 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	Position at Deadline 4	Status	Likelihood of Resolution
				<p>SRN Impacts within England: Response to RR-025 [REP1-062].</p> <p>The findings of Topic Paper: Consideration of Construction Traffic and SRN Impacts within England: Response to RR-025 [REP1-062] provide a robust demonstration that peak levels of development traffic will not have a material impact on the SRN during the temporary construction phase.</p>			
1.4	Consideration of the SRN – Abnormal Indivisible Loads (AIL) movements from Ellesmere Port	Chapter 10: Traffic and Transport [APP-048]	<p>National Highway's Relevant Representation (RR-025) – NH8</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>	<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 would be required at that stage. An AIL Route Feasibility study (Appendix A of the Framework CTMP [REP1-025]) was prepared to inform any cautions which may impact the viability of AIL route options from the point of land side delivery to the site. This study considered potential AIL movements from the three port options (Port of Mostyn, Connah's Quay Jetty and Ellesmere Port) based on the assumptions at the time of the submission.</p>	It is agreed that the updated Framework CTMP (EN010166/APP/6.6) including Appendix A now provides sufficient detail which confirms how the movement of AILs will be managed and agreed.	Agreed	Resolved
1.5	Optional staff travel patterns	Chapter 10: Traffic and Transport [APP-048]	<p>National Highway's Relevant Representation (RR-025) – NH3</p> <p>There is not anticipated to be a material change in staff travel patterns during the operation phase, which is accepted.</p>	The Applicant acknowledges agreement on this matter.	Agreed	Agreed	Resolved

Ref	Subject	Relevant Application Document	National Highways Comment	Applicant's position	Position at Deadline 4	Status	Likelihood of Resolution
1.6	Development of the framework CWTP	<p>Chapter 10: Traffic and Transport [APP-048]</p> <p>Framework CWTP [APP-248]</p>	<p>National Highway's Relevant Representation (RR-025) – NH3</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 draft DCO [APP-019].</p>	<p>Regarding requested consultation with National Highways on the Framework CWTP [APP-247], Draft DCO (EN010166/APP/3.1) Requirement 5 states:</p> <p>(1) No stage of the authorised development may commence until a CTMP for that stage, in general accordance with the Framework construction traffic management plan, has been submitted to and approved by the relevant planning authority following consultation with the relevant highway authority.</p> <p>(2) The CTMP for each stage must be accompanied by a construction worker travel plan in general accordance with the framework construction worker travel plan.</p> <p>(3) Each stage of the authorised development must be implemented in accordance with the approved CTMP and the construction worker travel plan for that stage.</p> <p>The Framework Construction Traffic Management Plan (CTMP) [REP1-025] includes the requirement to engage with National Highways, where relevant, regarding AIL delivery routes (3.4.12), site deliveries (4.2.27) and the setup of a local liaison committee (5.1.1). The Applicant considers this to be sufficient and appropriate in this case</p>	<p>It is agreed by National Highways that the wording in the draft DCO (EN010166/APP/3.1) and the content of the Framework CTMP (EN010166/APP/6.6) and Framework CWTP (EN010166/APP/6.7) are sufficient in order to ensure that National Highways will be consulted in relation to the discharge of this Requirement.</p>	Agreed	Resolved
1.7	Development of the framework CTMP	<p>Chapter 10: Traffic and Transport [APP-048]</p> <p>Framework CMTMP [APP-247]</p>	<p>National Highway's Relevant Representation (RR-025) – NH9</p> <p>National Highways request consultation on the development of the framework CTMP. This request also extends to consultation required in support of discharge of Requirement 19 of the draft DCO [APP-019].</p>	<p>The Applicant has added reference to consultation with National Highway within the Framework CTMP [REP1-025] submitted at Deadline 1. It is noted that during the meeting on 9 March 2026, National Highways request additional edits within earlier paragraphs of this document which will be considered by the Applicant.</p>	<p>The Applicant has provided some additional clarity in paragraph 1.4.2 of the Framework CTMP (EN010166/APP/6.6) provided at Deadline 4 to address this matter.</p>	Under discussion	High

Ref	Subject	Relevant Application Document	National Highways Comment	Applicant's position	Position at Deadline 4	Status	Likelihood of Resolution
1.8	Development of any future DTMP	Chapter 10: Traffic and Transport [APP-048]	National Highway's Relevant Representation (RR-025) – NH9 National Highways request consultation on the development of any future DTMP.	As noted within Requirement 17 of the Draft DCO (EN010166/APP/3.1) a Decommissioning Environmental Management Plan must be produced within 12 months of the date of proposed decommissioning. Plans that must be contained within that plan and relevant consultation would be determined at that time and National Highways would be consulted if required.	This is noted by National Highways.	Agreed	Resolved
1.9	Trip generation and mode split	Chapter 10: Traffic and Transport [APP-048]	National Highway's Relevant Representation (RR-025) – NH6 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.	Please refer to the response provided to 1.6.	This is noted by National Highways.	Agreed	Resolved
1.10	Cumulative assessment	Chapter 24: Combined and Cumulative Effects [APP-063]	National Highway's Relevant Representation (RR-025) – NH10 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) to confirm any additional sites within their boundary which should be considered. 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	Details of engagement with Flintshire County Council (FCC), within whose authority area the development is wholly situated, on cumulative and combined effects are presented in Chapter 24: Combined and Cumulative Effects [APP-062] . A meeting was held prior to submission of the DCO application to seek agreement on the Short List. An agreement was reached for FCC to review the Short List after the meeting, and acknowledgement of receipt was received from FCC. Cheshire West and Chester (CWaC) were not consulted on this short list but were generally consulted on the Proposed Development throughout the process and have made no objection or comment on the approach to cumulative assessment. The Proposed Development is situated wholly within FCC. CWaC have not raised any concerns regarding the approach taken through the pre-application consultation process nor in a Relevant Representation, and as such the Applicant does not consider it necessary to re-engage further with CWaC Council. Regarding the listed schemes	National Highways and the Applicant have discussed the importance of taking into account cumulative development trips during the construction stage. The Framework CTMP (EN010166/APP/6.6) now includes a commitment by the Applicant to engage in transport working groups in order to manage construction impacts.	Agreed	High

Ref	Subject	Relevant Application Document	National Highways Comment	Applicant's position	Position at Deadline 4	Status	Likelihood of Resolution
			<p>traffic, along with any additional developments which may be identified by CWaC:</p> <ul style="list-style-type: none"> • HyNet Hydrogen • HyNet Carbon Dioxide • Mersey Tidal Power • Stanlow CHP • Frodsham Solar • Hob Lane Solar Farm • Runcorn Spur Pipeline • Protos CCP • A494 River Dee Bridge replacement scheme 	<p>provided in this Representation, the Applicant considered these in light of the methodology outlined in Chapter 24: Combined and Cumulative Effects [APP-062] (in line with PINS guidance), and a discussion on the findings is presented in the following paragraphs. With regards to the listed schemes, the HyNet CCS Carbon Dioxide (CO₂) Pipeline, Mersey Tidal Power, and the A494 River Dee Bridge replacement scheme are considered in the DCO application in Chapter 24: Combined and Cumulative Effects [APP-062] and detailed in Appendix 24-A: Long List of Proposed Schemes [APP-244], and Appendix 24-B: Short List of Proposed Schemes [APP-245].</p> <p>The HyNet North West Hydrogen Pipeline, Stanlow Hydrogen Ready Modular Combined Heat and Power Project, Frodsham Solar Farm, Hob Lane Solar Farm, Runcorn Spur Pipeline, and Protos Carbon Capture Plant (CCP) are all located outside of the 15 km Traffic and Transport Zone of Influence (Zoi) for the Proposed Development, and as such were not considered during the DCO application.</p>			
1.11	<p>Chapter 10: Traffic and Transport [APP-048]</p> <p>Framework CMTP [APP-247]</p>		<p>National Highway's Relevant Representation (RR-025) – NH13</p> <p>National Highways will require any detailed CTMP and CWTP to take the following into account:</p> <ol style="list-style-type: none"> 1. Any commitments regarding the routing and arrival / departure times of construction vehicles, including AILs, should be secured through a final CTMP. 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. 3. National Highways would strongly recommend that the final CTMP contain a detailed construction staff 	<ol style="list-style-type: none"> 1. The Framework CTMP [REP1-025] includes a commitment to construction working hours, routing of construction vehicles, and potential routing of AILs, to be taken forward and secured through a final CTMP. 2. The potential impact of construction traffic on the SRN has been considered for an extended study area as part of Topic Paper: Consideration of Construction Traffic and SRN Impacts within England: Response to RR-025 [REP1-062]. 3. Section 8 of the Framework CWTP [APP-248] sets out the main target for mode share during construction of the Proposed Development. This includes a commitment for the CWTP Co-ordinator to monitor parking 	<p>National Highways agreed that the updated Framework CTMP (EN01066/APP/6.6) and Framework CWTP (EN010166/APP/6.7) now adequately address these points.</p>	Agreed	Resolved

Ref	Subject	Relevant Application Document	National Highways Comment	Applicant's position	Position at Deadline 4	Status	Likelihood of Resolution
			<p>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 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>	<p>utilisation at the Main Development Area and Construction and Indicative Enhancement Area (C&IEA) (connection), reviewing the split between cars, vans and minibuses. Ensuring that this target is met is dependent on the contractor encouraging workers to travel to and from the Main Development Area by sustainable options provided in the final CWTP. If the program of monitoring determines that the target is not being met, this would result in consideration of need for additional measures to be implemented to ensure the final CWTP stays on course to meet its overall objectives.</p> <p>4. Section 5 of the Framework CTMP [REP1-025] was updated at Deadline 1 to include a commitment to ensure collaboration with developers of nearby major developments. This would encompass advance communications and engagement regarding any significant traffic management work, inclusive of road closures and diversions.</p>			
1.12	Articles and Schedules	Draft DCO [APP-019]		The wording of the Articles and Schedules in the Draft DCO [APP-019] is appropriate.	This matter is agreed	Agreed	Resolved

