

## Connah's Quay Low Carbon Power

### Final Statement of Common Ground between Uniper UK Limited and Airbus Operation Limited (Tracked)

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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 28 August 2025, and the Examination commenced on 13 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 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.

## 1.2 Parties to this Statement of Common Ground

- 1.2.1 This SoCG has been prepared between (1) the Applicant and (2) Airbus Operations Limited (Airbus) (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 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.

- 1.2.3 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 CO<sub>2</sub> emissions by high-quality CO<sub>2</sub>-offsets.

#### Airbus

- 1.2.4 Airbus is a major European aerospace corporation that designs, manufactures, and sells commercial aircraft (like the A320, A350, A380), helicopters, defense, and space systems, aiming for sustainable and innovative aviation solutions with advanced, fuel-efficient planes and digital connectivity, connecting communities globally while also leading in defense tech and space exploration.
- 1.2.5 Hawarden Airport (CEG/EGNR) is a major Airbus facility and is located approximately 8.5 km to the south east of the Proposed Development Site.

### 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 (CO<sub>2</sub>) pipeline, comprising existing and new elements, the Proposed Development would make use of CO<sub>2</sub> 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 CO<sub>2</sub> Pipeline Project'), that will transport CO<sub>2</sub> captured from existing and new industries in North Wales and North-West England, for offshore storage. The captured CO<sub>2</sub> 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) [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 ~~draft~~final version of the SoCG has been ~~prepared for Deadline 4 of the Examination by the Applicant agreed~~ and ~~has been shared with Airbus for comment. This document will continue to be revised signed by both parties and updated as discussions progress during the Examination period forms the final SoCG.~~

## 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.

## 1.6 Record of Engagement

1.6.1 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 and Attendees	Key Topics Discussed and Key Outcomes
12 May 2025	Email from Airbus Safeguarding & Compliance Manager to the Applicant	Response from Targeted consultation to confirm the Proposed Development would infringe on the Outer Horizontal Surface (OHS) of the Obstacle Limitation Surface.
29 May 2025	Email from Airbus Safeguarding & Compliance Manager to the Applicant's Planning Consultant	Airbus noted the stacks would impinge on the outer horizontal surface, and new infringements shouldn't be accepted.
11 June 2025	Meeting between the Applicant and Airbus Safeguarding & Compliance Manager and Aerodrome Strategic Planning Manager	Introductory meeting to provide an overview of the Proposed Development and to discuss approaches to address concerns raised by Airbus.
8 August 2025	Email from the Applicant to Airbus Safeguarding & Compliance Manager	Applicant requested confirmation from Airbus that if the final stack height is below 147.695 m AGL, this will no longer present an obstruction issue.
19 August 2025	Email from Airbus Safeguarding & Compliance Manager to the Applicant	Confirmation that the 155 m restriction would apply horizontally over the whole site, and request for the Applicant to confirm the final stack heights.
6 January 2026	Email from the Applicant to Airbus Safeguarding & Compliance Manager	Email to notify Airbus of the stack height change and that a SoCG is being drafted.

16 January 2026	Meeting between the Applicant and Airbus Safeguarding & Compliance Manager	Applicant updated Airbus on DCO timeline, proposed changes to stacks, protections in place to safeguard aviation in draft DCO and discussed the draft SoCG.
20 January 2026	Email between Applicant and Airbus Safeguarding & Compliance Manager	Applicant shared updated draft SoCG.
11 February 2026	Email between Applicant and Airbus Safeguarding & Compliance Manager	Applicant sought an update on whether Airbus had been able to review previously sent SoCG draft. Applicant also requested contact details for parties to support completing Instrument Flight Procedure (IFP) assessments.
11 February 2026	Email between Airbus Safeguarding & Compliance Manager and Applicant	Airbus updated that Legal review had not yet been conducted and sharing requested contact details.
19 February 2026	Email between Applicant and Airbus Safeguarding & Compliance Manager	Applicant highlighted to Airbus that specific Examiners Questions had been raised that were addressed to Airbus.
3 March 2026	Email between Airbus Safeguarding & Compliance Manager and Applicant	Airbus copied Applicant into email seeking clarification internally on position relating to Examiners Questions.
10 March 2026	Meeting between the Applicant and Airbus Safeguarding & Compliance Manager and Head of Aerodrome Management	Applicant sought an update on whether Airbus had been able to review previously sent SoCG draft, as well as clarification on assessments required for tall structures associated with the Proposed Development. Confirmed IFP not required for stacks

		where they are below OHS. An IFP would be required for cranes where above the OHS. Airbus also confirmed no radar assessment required.
11 March 2026	Email between Airbus Safeguarding & Compliance Manager and Applicant	Airbus acknowledged that formal adoption of the change application (regarding stack heights) would be beneficial in reaching final agreement on SoCG.
25 March 2026	Email between Applicant and Airbus Safeguarding & Compliance Manager	Applicant highlighted intent to update SoCG as previously communicated to Airbus and agreed in previous response from Airbus.

## 1.7 Areas of Discussion between the Parties

1.7.1 **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	Topic	Relevant Application Document	Applicant's position	Airbus Position	Status	Likelihood of Resolution
1	Stack height	<p><b>ES Volume II Chapter 4: The Proposed Development [APP-042]</b></p> <p><b>Change Notification [AS-006]</b></p>	<p>The Applicant is carrying out further air quality assessments to support the reduction in emission stack heights and a formal change to the Application is being progressed by the Applicant to reduce the stack heights below the outer horizontal surface.</p> <p><u>This formal change application has now been accepted into the examination process as of 7 April 2026.</u></p>	<p>The Proposed Development must not impinge on the outer horizontal surface.</p> <p>A verification of the Instrument Flight Procedure (IFP) will be required to be undertaken by the appropriate Approved Procedure Design Organisation (Cyrrus Ltd) for the revised stacks. This would be undertaken on behalf of the Applicant. However, where the stack height can be reduced to such a level as the outer horizontal surface is not penetrated, then this requirement for an IFP can be avoided.</p> <p><u>As the formal change application has now been accepted into the examination process, the need for this assessment has now fallen away.</u></p>	<p><del>Under discussion</del> <u>Agreed</u></p>	<p><del>High</del><u>N/A</u></p>

Ref	Topic	Relevant Application Document	Applicant's position	Airbus Position	Status	Likelihood of Resolution
2	Cranes	<b>ES Volume II Chapter 5: Construction Management and Programme [APP-043]</b>	<p>Cranes will be required to construct the proposed development, the final selection of which has not been made.</p> <p><u>IFP assessments will be undertaken for the craneage involved in the construction of the Proposed Development, where these may infringe the outer horizontal surface.</u></p>	<p>Crane operators would be required to complete the Airspace Coordination and Obstacle Management Service (ACOMS) process. Depending on the crane design and duration in situ this may require a Notification to Aviation (NOTAM) be published or, where cranes may be in situ for more than 3 months, the need for cranes to be considered notifiable permanent obstacles.</p> <p>A verification of the Instrument Flight Procedure (IFP) will be required to be undertaken by the appropriate Approved Procedure Design Organisation (Cyrrus Ltd) for the proposed crane(s) or crane operation area. This would be undertaken on behalf of the Applicant.</p> <p>If there is a potential infringement of the IFP's, and based on aircraft using the airfield in the visual circuit or visual approach (non-instrument aircraft) Airbus would prefer the</p>	<del>Under discussion</del> <u>Agreed</u>	<del>High</del> <u>N/A</u>

Ref	Topic	Relevant Application Document	Applicant's position	Airbus Position	Status	Likelihood of Resolution
				construction phase to take place during the summer months.		
3	Radar Assessment	<b>ES Volume II Chapter 4: The Proposed Development [APP-042]</b>	The Applicant will obtain assessments of aviation safety as agreed with Airbus, and this is limited to IFP verification of elements of the Proposed Development penetrating the outer horizontal surface.	No radar assessment is required for the proposed development.	Agreed	N/A
4	DCO Articles and Requirements	<b>Draft DCO [APP-019]</b>	The Draft DCO includes articles and requirements which are appropriate for the Proposed Development. Specifically:  Requirement 4 – Construction Environmental Management Plan (1) No stage of the authorised development may commence until a CEMP for that stage has been submitted to and approved by the relevant planning authority. (2) The CEMP must be in general accordance with the framework construction environmental	Subject to rows 1 and 2 above, Airbus has no objection to the drafting of the articles and requirements in the Draft DCO. It is understood that these adequately secure the rights required by Airbus to manage aerodrome safety.	Agreed	N/A

Ref	Topic	Relevant Application Document	Applicant's position	Airbus Position	Status	Likelihood of Resolution
			<p>management plan and the lighting strategy...</p> <p>(3) Each stage of the authorised development must be carried out in accordance with the approved CEMP for that stage unless otherwise agreed with the relevant planning authority.</p> <p>(4) Limbs (a), (b), (d), (e), (g), (h), (i) and (j) of the site-enabling works must be carried out in general accordance with the framework construction environmental management plan and the lighting strategy.</p> <p>Requirement 14 – Aviation Warning Lighting</p> <p>(1) No stage of Work No. 1(a) or (b) may commence until details of the timetable for construction and retention of tall structures or the placement and retention of mobile cranes and the specification and installation timetable for aviation warning lighting for that stage during construction and operation have been submitted to and approved by the relevant planning authority following</p>			

Ref	Topic	Relevant Application Document	Applicant's position	Airbus Position	Status	Likelihood of Resolution
			<p>consultation with the Civil Aviation Authority and Airbus.</p> <p>(2) The details submitted pursuant to sub-paragraph (1) must be in general accordance with the lighting strategy.</p> <p>(3) Work No. 1(a) and (b) must be operated and maintained in accordance with the details approved pursuant to sub-paragraph (1).</p> <p>Requirement 15 – Air Safety</p> <p>(1) No stage of Work No. 1(a) or (b) may commence until details of the heights of structures and temporary cranes and other information that is required by Civil Aviation Authority and Airbus to chart the site for aviation purposes for that stage have been submitted to and approved by the relevant planning authority, following consultation with the Civil Aviation Authority and Airbus.</p> <p>(2) The details submitted pursuant to sub-paragraph (1) must be in general accordance with the framework</p>			

Ref	Topic	Relevant Application Document	Applicant's position	Airbus Position	Status	Likelihood of Resolution
			construction environmental management plan. (3) The details approved pursuant to sub-paragraph (1) must thereafter be implemented, operated and maintained in accordance with the approved details.			

## 2. Approvals

### 2.1 The Applicant

Signed: \_\_\_\_\_

Name: \_\_\_\_\_

Position: \_\_\_\_\_

Date: \_\_\_\_\_

Signed: \_\_\_\_\_

Name: \_\_\_\_\_

Position: \_\_\_\_\_

Date: \_\_\_\_\_

### 2.2 Airbus

Signed: \_\_\_\_\_

Name: \_\_\_\_\_

Position: \_\_\_\_\_

Date: \_\_\_\_\_

