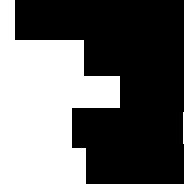
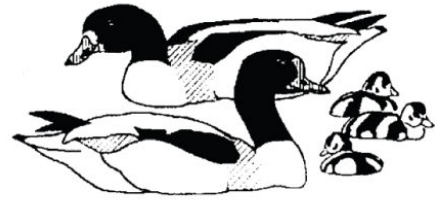


Deeside Naturalists' Society



13 May 2026

Interested Party Reference number: [REDACTED]

Comments for deadline 6

We wish to make the following comments and recommendations on key aspects of the applicant's proposals that affect the nature conservation interest of the site.

Impact on Curlews and other birds using the 'functionally linked land'

Firstly, we have read detailed comments especially from NRW, NE and RSPB on the impact of the development on Curlews, which are broadly similar to the key points we have made from the start of the consultation process.

The loss of land that Curlews use for feeding, principally in autumn and winter, will be significant. Every effort needs to be made to mitigate for the loss of these feeding areas by retaining and enhancing habitat on-site and providing suitable alternative habitat elsewhere. Given that the land selected to provide the alternative habitat is some distance away we consider it especially important that on-site mitigation opportunities are maximised as Curlews are known to be faithful to their traditional wintering sites and it cannot be expected that those currently using the functionally linked land will necessarily use the alternative habitat.

We wish to make three key points about this:

1. There is scope to mitigate for some of this impact in Compartment 1 (11 ha. conservation area) of the existing site, principally by bringing the land back into favourable condition for feeding Curlews. This can be put in place by Uniper through a revision of the site conservation management plan, which is currently under review, so it is an ideal time to do this.

Recommendation: Uniper to be required to include enhanced management for Curlews in Compartment 1 within the current revision of the management plan. This to be continued for the life of the development.

2. The planting of trees in a section of the functionally linked land to meet tree planting requirements is at odds with the need to mitigate for the impacts of the development of Curlews. We have consistently advocated for the tree planting not to be carried out in this area except where it is needed for screening purposes. We believe that planting trees on the functionally linked land – an open grassland habitat closely linked to the open and expansive wetland habitats of the Dee Estuary – is contrary to the UK Forestry Standard (UKFS), which states that:
 - In planning new woodland, you should assess your sites existing wildlife to identify if any priority habitats and species are present including those protected by law.
 - New woodlands should integrate into and enhance our landscape, connect with communities, and consider any existing features, land use and habitats.

Recommendation: Uniper to find a suitable alternative location for the tree planting requirements that does not impact on the functionally linked land.

3. Uniper has acquired land at Gronant to deliver suitable alternative habitat for feeding Curlews. Considering the very limited options available to deliver alternative high quality Curlew feeding habitat within the Dee Estuary and we consider that is very likely the best option. We have made suggestions to Uniper on how the habitat restoration of this site can be enhanced to give the highest likelihood that these fields could regularly support at least 50 wintering Curlews.

Recommendation: Uniper's management plan for the Gronant site should focus on establishing seasonally flooded pools within the grassland utilising existing topography. Shallow excavation should be made (rather than creating foot drains) to create the pools. Grazing with cattle in summer and early autumn should be carried out to establish a reasonably short sward suitable for foraging Curlews.

Impact on the internationally important bird populations using the estuary habitats adjacent to the proposed development

We continue to be highly concerned about the potential impact of the development on wading birds and wildfowl that use the saltmarsh and mudflats immediately adjacent to the development site. This is primarily due to the very significant potential for disturbance to these birds caused by the construction of the new power station, and during its operation. We wish to make two key points about this

1. We do not think that the provision of a 3m acoustic fence will mitigate this impact significantly as the construction site will clearly be very tall (no doubt involving many cranes and very significant construction movements and noise).

Recommendation: we would like to be reassured that there is sufficient mitigation in place to reduce disturbance risk as far as possible, and contingency measures should significant disturbance events be observed once construction commences.

2. We consider that it is essential that Uniper ensure that the sluices that operate in Compartment 2 (bunded pools complex) to regulate water levels in the saltmarsh pools are working properly. Currently they are in a state of disrepair which means the pools dry out frequently and are less used by wading birds than in the past. If the sluices operate properly

the pools will not dry out and will thus provide improved feeding and roosting habitat for wading birds that is well screened from the development, helping mitigate for the impact of disturbance from the development during construction.

Recommendation: Uniper are required to repair/replace sluices prior to construction starting so that the pools are in optimal condition for waterbirds for the life of the development.



Secretary