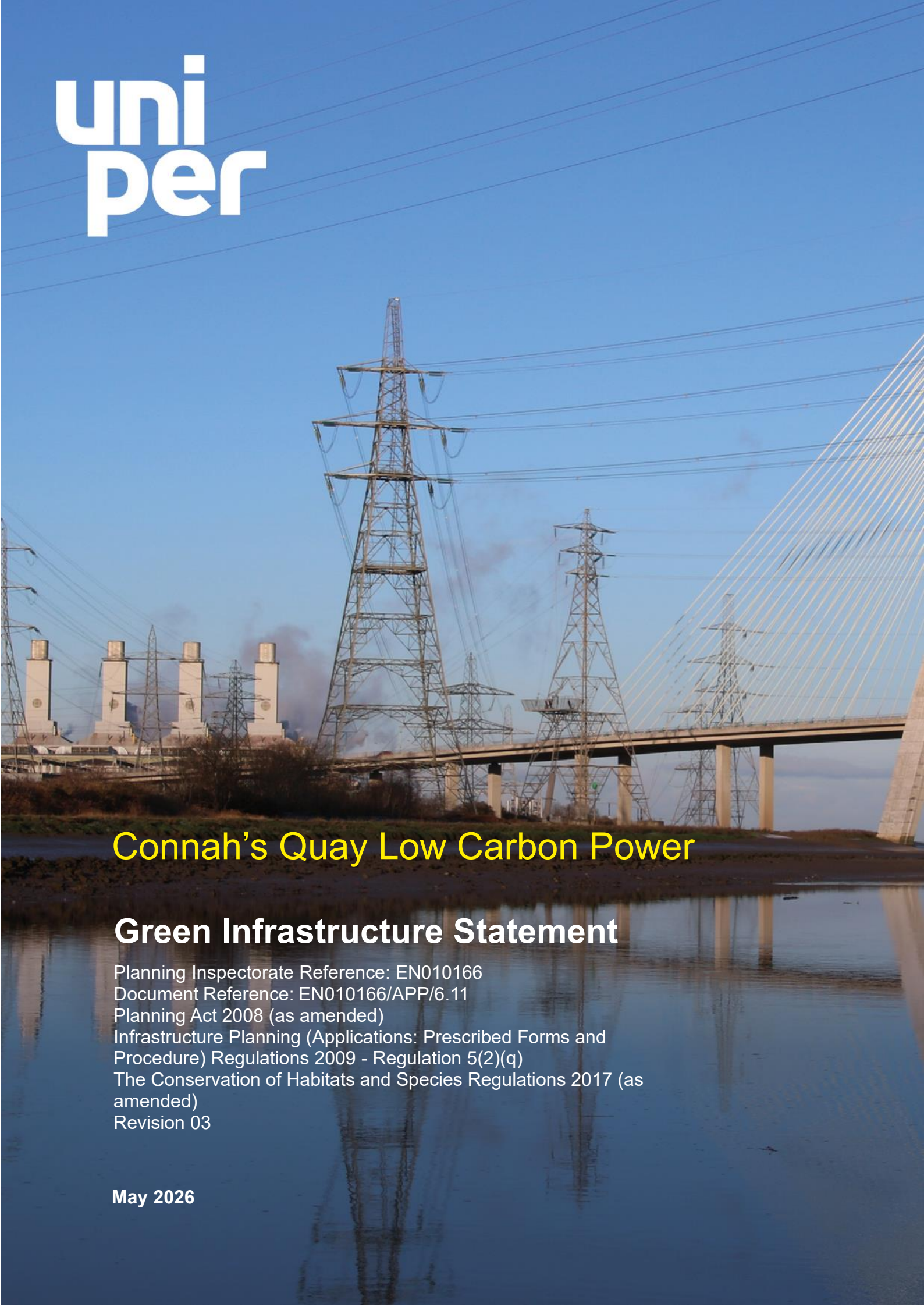

Connah's Quay Low Carbon Power

Green Infrastructure Statement

Planning Inspectorate Reference: EN010166
Document Reference: EN010166/APP/6.11
Planning Act 2008 (as amended)
Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 - Regulation 5(2)(q)
The Conservation of Habitats and Species Regulations 2017 (as amended)
Revision 03

May 2026

Prepared for:
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Prepared by:
AECOM Limited

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Executive Summary

The Green Infrastructure (GI) Statement has been prepared by Uniper UK Limited (the Applicant) to outline how Net Benefit for Biodiversity (NBB) and GI will be delivered through the Connah's Quay Low Carbon Power project (herein referred to as the 'Proposed Development'). This responds to the Welsh Government's policy requirements for delivering NBB and GI in Wales, as set out in Planning Policy Wales, Edition 12 (PPW 12)

Section 4 outlines the diversity, extent and condition of habitats present within the Construction and Operation Area which have been established through a combination of field surveys and desk study. The relevant surveys are reported in **Appendices 11- C: Botanical Technical Appendix** to **11-K: Aquatic Ecology Technical Appendix (EN010166/APP/6.4)**, **Appendix 5-B: Environmental Screening of the Hardstanding Expansion at Connah's Quay North Jetty (EN010166/APP/6.4)** and **Appendix 15-G: Arboricultural Impact Assessment (EN010166/APP/6.4)**.

Alternatives to the Proposed Development are discussed at a high level in Section 6, which covers steps taken to avoid and minimise effects on biodiversity as steps 1 and 2 of the 'Stepwise Approach'. Further compliance with the remaining steps of the Stepwise Approach is provided in Section 7.5.

Within Section 7, consideration has been given to the temporary laydown areas required for construction as well as the permanent footprint of the development in determining whether the Proposed Development could achieve NBB through re-provision of habitats on-site or whether off-site delivery is required. As outlined in Section 7.4, the **Outline Landscape and Ecology Management Plan** (**LEMP**) **(EN010166/APP/6.9**) provides and indicative landscape masterplan for the Main Development Area during the operational phases which delivers a combination of grassland, scrub, trees, woodland and open mosaic habitat in areas required temporarily during construction. Following a review of the indicative landscape masterplan for the Main Development Area in the context of the baseline, and as summarised in Section 8, due to the presence of permanent infrastructure, further measures are required off-site to ensure the Proposed Development achieves a NBB.

The Applicant completed a land search of a number of sites in the vicinity of the Order limits and extended the search following initial results of desk studies and landowner engagement and following detailed surveys, purchased the land at Gronant Fields, Prestatyn, in September 2025. Section 8.3 provides further detail of the consideration of alternative sites for offsite NBB delivery. The **Off-site Net Benefit for Biodiversity and Green Infrastructure Strategy (EN010166/APP/6.14)** outlines how the combination of measures included within the **Outline Curlew Implementation and Monitoring Plan (EN010166/APP/6.4)** and **Off-site Net Benefit for Biodiversity and Green Infrastructure Strategy (EN010166/APP/6.14)** secure habitat creation and enhancement measures that exceed the minimum requirements of PPW 12 and would result in a NBB. The **Outline Curlew Implementation and Monitoring Plan (EN010166/APP/6.13)** includes

provision of measures related to enhancement of 26 ha of wet grassland to offset the majority of grassland loss within the Main Development Area, whilst the **Off-site Net Benefit for Biodiversity and Green Infrastructure Strategy (EN010166/APP/6.14)** outlines how the remaining 1.8 ha shortfall in the delivery of on-site habitat creation (0.42 ha of woodland, 3 individual trees and 1.38 ha of scrub) could be delivered in the remaining 30.30 ha of the Gronant Field site.

Table ES-1 provides a summary of the findings of the GI Statement.

Table ES-1: Summary of the Green Infrastructure Statement

Habitat	Conclusion (indicative on-site) Secured by Requirement 10	Further commentary	Off-site provision (Indicative within Off-site Delivery Area)	Overall conclusion (Extent)	Diversity of mitigation / compensation	Condition of mitigation / compensation	Connectivity of mitigation / compensation
Other cereal crop	No net loss	all habitat retained		No net loss	N/A	N/A	N/A
Purple moor grass and rush pasture	No net loss	all habitat retained		No net loss	N/A	N/A	N/A
Bracken	Net loss of 0.05 ha			Net loss of 0.05 ha	N/A	N/A	N/A
Modified grassland	Net loss of 14.32 ha	Off-site creation required (18.14 ha). Secured by Requirement 10 and 18	Wet grassland creation of 26 ha Grassland enhancement of 21.64 ha	Net benefit of 29.5 ha	By replanting grassland of a higher distinctiveness which would comprise a more diverse vegetative community	Reinstated and new grassland would be managed in accordance with the measures in the OLEMP, Off-site NBB and GI Strategy and Curlew Mitigation Strategy	Connected to the offsite delivery area by the Dee-estuary.
Other neutral grassland	Net loss of 3.82 ha						
Bramble scrub	Net loss of 0.43 ha	Off-site creation required (1.38 ha). Secured by Requirement 18	1.38 ha	No net loss	N/A	N/A	N/A
Mixed Scrub	Net loss of 0.95 ha						
Coastal Saltmarsh	Net benefit of 0.13 ha	Secured by Requirement 22		Net benefit of 0.13 ha	Creating saltmarsh habitat adjacent to the Dee Estuary/Aber	Ecological Safeguard Zone provides a buffer	Net benefit would be provided adjacent to existing areas of

Habitat	Conclusion (indicative on-site) Secured by Requirement 10	Further commentary	Off-site provision (Indicative within Off-site Delivery Area)	Overall conclusion (Extent)	Diversity of mitigation / compensation	Condition of mitigation / compensation	Connectivity of mitigation / compensation
					Dyfrdwy SAC/ SSSI/Ramsar would increase the opportunity for diverse communities to establish as well as providing important natural resources to support the diversity and rarity of breeding birds, invertebrates and fish.	*Management measures within FCEMP would maintain condition of retained habitats* *Saltmarsh created would be required to meet the UK BAP definition*	*saltmarsh and would enhance ecological connectivity.*
Introduced Scrub	*Net loss of 0.1ha*			*Net loss of 0.1ha*	*N/A*	*N/A*	*N/A*
Artificial Unvegetated unsealed Surface	*Net increase of 0.9 ha*			*N/A*	*N/A*	*N/A*	*N/A*
Developed Land Sealed Surface	*Net increase of 14.43 ha*			*N/A*	*N/A*	*N/A*	*N/A*
Open Mosaic habitat	*Net benefit of 3.84 ha*			*Net benefit of 3.84 ha*	*OMH supports a wide range of species. The mix of hard standing and vegetated land creates a*	*Reinstated and new areas of OMH would be managed in accordance with*	*Enhances ecological connectivity by linking different habitats, such as*

Habitat	Conclusion (indicative on-site) Secured by Requirement 10	Further commentary	Off-site provision (Indicative within Off-site Delivery Area)	Overall conclusion (Extent)	Diversity of mitigation / compensation	Condition of mitigation / compensation	Connectivity of mitigation / compensation
					variety of microhabitats, promoting a diverse ecosystem	the measures in the OLEMP	grassland and shrub.
Other Lowland Mixed Deciduous Woodland	No net loss	all habitat retained		No net loss	N/A	N/A	N/A
Other broadleaved woodland	Net benefit 1.19 ha	Further off-site creation required to meet 3:1 ratio (0.42 ha). Secured by Requirement 18	1.95 ha	Net benefit of 3.14 ha	Active management of retained woodland The creation of additional woodland will increase the species diversity for both woody vegetation and ground flora	Reinstated and new woodland would be managed in accordance with the measures in the OLEMP and off-site NNB and GI Strategy	On-site provision would provide additional connectivity across the wider landscape Off-site provision would also provide landscape scale benefits connecting existing areas of woodland habitats with and adjacent to the Off-Site delivery area

Habitat	Conclusion (indicative on-site) Secured by Requirement 10	Further commentary	Off-site provision (Indicative within Off-site Delivery Area)	Overall conclusion (Extent)	Diversity of mitigation / compensation	Condition of mitigation / compensation	Connectivity of mitigation / compensation
Non-native and ornamental hedgerow	*No net loss*	*all habitat retained*		*No net loss*	*N/A*	*N/A*	*N/A*
Species rich native hedgerow	*No net loss*			*No net loss*	*N/A*	*N/A*	*N/A*
Other native hedgerow	*Net benefit 0.32 km*			*Net benefit 0.32 km*	*A mix of whips and standard sized shrubs of native species of local provenance in keeping with the overall species composition of hedgerows affected.* *The important hedgerow criteria should be followed in replanting and creation of hedgerow.*	*Reinstated and new hedgerows would be managed in accordance with the measures in the OLEMP*	*The majority of hedgerow would be replaced. New hedgerow provision would mimic the existing connection from the estuary to habitats adjacent to the A458 to expand commuter routes.*
Individual Trees	*Net benefit of 70 trees*	*Further off-site creation required to meet 3:1 ratio (3 trees). Secured by Requirement 18*	*3*	*Net benefit of 73 trees*	*Ancient and Veteran trees will be retained, preserving their ability to support a wide range of*	*New trees would be managed in accordance with the measures in the OLEMP and*	*RPAs for retained trees within the Proposed Development 's construction phase helps*

Habitat	Conclusion (indicative on-site) Secured by Requirement 10	Further commentary	Off-site provision (Indicative within Off-site Delivery Area)	Overall conclusion (Extent)	Diversity of mitigation / compensation	Condition of mitigation / compensation	Connectivity of mitigation / compensation
					species and maintain the diversity of habitats	off-site NBB and GI Strategy.	support GI features and corridors
Individual Trees - Ancient or Veteran Tree	No net loss	all habitat retained		No net loss	N/A	N/A	N/A

1. Introduction

1.1 Purpose of this document

1.1.1 This document has been prepared by Uniper UK Limited (the Applicant) to outline the provision of Net Benefit for Biodiversity (NBB) and Green Infrastructure (GI) to support the Development Consent Order (DCO) application for the Connah's Quay Low Carbon Power project (herein referred to as the Proposed Development). This responds to the Welsh Government's policy requirements for delivering NBB and GI in Wales, as set out in Planning Policy Wales, Edition 12 (PPW 12) (Ref 1).

1.1.2 This report (hereafter referred to as the 'GI Statement') combines the outputs of the NBB assessment and GI statement outputs into a single document.

1.1.3 This GI Statement uses terminology aligned to PPW 12 and the Stepwise approach. Other documents within the application such as **Chapter 11: Terrestrial and Aquatic Ecology (EN010166/APP/6.2.11)** and the **Report to Inform Habitats Regulations Assessment (EN010166/APP/6.12)** utilise different terminology related to the guidance produced for these assessments (for example, Chartered Institute of Ecology and Environmental Management (CIEEM) Ecological Impact Assessment guidelines (Ref 2), UK Government Advice on Appropriate Assessment (Ref 3) and the Planning Inspectorate's 'Advice on Habitats Regulations Assessments' (Ref 4)). As a result, this Green Infrastructure Statement utilises the terms 'compensation' and 'compensate' to describe some actions which amount to 'mitigation' within **Chapter 11: Terrestrial and Aquatic Ecology (EN010166/APP/6.2.11)** and the **Report to Inform Habitats Regulations Assessment (EN010166/APP/6.12)** in their relevant context.

1.2 The Applicant's position for NBB and GI

1.2.1 Under the Environment (Wales) Act 2016 (Ref 5) and PPW 12 (Ref 1), Nationally Significant Infrastructure Projects (NSIPs) in Wales are required to deliver a NBB and improve ecosystem resilience, proportionate to the scale and nature of the development. The Applicant is committed to achieving this net benefit in proportion to the Proposed Development's impact to biodiversity.

1.3 Background

1.3.1 The findings of this GI Statement have informed the design of the Proposed Development, detailing the positive benefit for biodiversity and the required long-term management to support the longevity of the habitats to be created.

1.3.2 Habitat creation and enhancement measures, both onsite and offsite measures, are proportionate to the scale and nature of the Proposed Development. These measures are tailored to locally valuable ecological features, including those referenced in the Flintshire County Council (FCC) Biodiversity Plan 'Supporting Nature in Flintshire' (Ref 6).

1.3.3 This document should be read in conjunction with the following documents included within the **Environmental Statement** (**ES**) and wider application:

- **Chapter 11: Terrestrial and Aquatic Ecology** (**EN010166/APP/6.2.11**);
- **Chapter 12: Marine Ecology** (**EN010166/APP/6.2.12**);
- **Chapter 13: Water Environment and Flood Risk** (**EN010166/APP/6.2.13**);
- **Chapter 14: Geology and Ground Conditions** (**EN010166/APP/6.2.14**);
- **Chapter 15: Landscape and Visual Amenity** (**EN010166/APP/6.2.15**);
- **Chapter 20: Climate Change** (**EN010166/APP/6.2.20**);
- **Appendix 15-G: Arboriculture Impact Assessment** (**EN010166/APP/6.4**);
- **Outline Landscape and Ecological Management Plan (LEMP)** (**EN010166/APP/6.9**);
- **Offsite Net Benefit for Biodiversity and Green Infrastructure Strategy** (**EN010166/APP/6.14**);
- **Outline Curlew Implementation and Monitoring Plan (EN010166/APP/6.13)**; and
- **Outline Saltmarsh Implementation and Monitoring Plan (EN010166/APP/6.16)**.

1.4 Rationale and Objectives

1.4.1 This GI Statement responds to the Welsh Government's approach to delivering NBB and GI in Wales (Ref 5). The following legislation and policy collectively ensure that developments must maintain and enhance biodiversity and create resilient ecological networks:

- Environment (Wales) Act 2016 (Ref 5);
- Well-Being of Future Generations (Wales) Act 2015 (Ref 7);
- Planning Policy Wales (PPW). Edition 12 (2024) (Ref 1); and
- Future Wales. The National Plan 2040 (2021) (Ref 9).

1.4.2 The objectives of the NBB Assessment are to demonstrate how the Proposed Development will:

- 1 - apply the Stepwise Approach;
- 2 - utilise the Diversity, Extent, Condition, Connectivity and Aspects of Ecosystem Resilience (DECCA) framework to promote ecosystem resilience with regards to green infrastructure;
- 3 - achieve a NBB, including through the provision of biodiversity mitigation or restoration, enhancement, and or creation; and

- 4 - demonstrate that a proportional management and monitoring plan would be implemented for any net benefit achieved.

1.4.3 The objectives of the GI Statement are to demonstrate how the Proposed Development has:

- 1 – identified priorities of green infrastructure, and
- 2 - consider how significant benefits can be delivered through green infrastructure, paying due regard to the building with nature standard framework (BwNSF) (Ref 10).

1.5 Proposed Development

1.5.1 The Connah's Quay Low Carbon Power (CQLCP) Abated Generating Station would comprise up to two Combined Cycle Gas Turbines (CCGT) with Carbon Capture Plant (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.

1.5.2 Through a carbon dioxide (CO_2) pipeline, comprising existing and new elements, the Proposed Development would make use of CO_2 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_2 Pipeline Project'), that will transport CO_2 captured from existing and new industries in North Wales and North-West England, for offshore storage. The captured CO_2 will be permanently stored in depleted offshore gas reservoirs in Liverpool Bay.

1.5.3 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.

1.5.4 A description of the Proposed Development, including details of maximum parameters, is set out in **Chapter 4: The Proposed Development** of the **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, which would adhere to the overall set parameters included within the DCO.

1.6 The Order limits

1.6.1 **Figure 3-3: Areas Described in the ES** (**EN010166/APP/6.3**), identifies the different components of the Proposed Development and Order limits which are referenced throughout this document. These comprise:

- The Construction and Operation Area:
  - Main Development Area;
  - Construction and Indicative Enhancement Area (C&IEA);
  - Water Connection Corridor;

  - Proposed CO_2 Connection Corridor[1];
  - Repurposed CO_2 Connection Corridor;
  - Electrical Connection Corridor;
  - Access to the Main Development Area; and
  - Hardstanding Expansion at Connah's Quay Jetty;
- The Accommodation Work Areas.

1.6.2 As described in **Chapter 5: Construction Management and Programme** (**EN010166/APP/6.2.5**) of the **ES**, the construction works are focused within the Construction and Operation Area, with the Accommodation Work Areas limited to works to facilitate the delivery of Abnormal Indivisible Loads (AILs). The Accommodation Works will be limited in scale and will not result in permanent changes to habitats. On this basis, this assessment focusses on the Construction and Operation Area.

1.6.3 The selected Off-Site Delivery Area is located northwest of Gronant Fields, Prestatyn. Whilst this land is outside of the Order limits, the Applicant is the owner of this land.

1.7 The Applicant

1.7.1 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.

1.7.2 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_2 emissions by high-quality CO_2-offsets.

[1] The Proposed CO_2 pipeline within the Proposed CO_2 Connection Corridor will tie into the Flintshire AGI which has already been consented as part of the HyNet Carbon Dioxide Pipeline project (PINS reference EN070007). Habitats within the AGI footprint and the Proposed CO_2 pipeline and consented as part of the HyNet DCO are therefore excluded from this assessment.

1. Policy Requirements and Legislation

1.1 Biodiversity policy and legislation

Overview

1.1.0 This Section sets out the planning policy and legislative requirements considered relevant to the delivery of NBB and GI both on and off-site as part of the Proposed Development.

Flintshire County Council Local Planning Policy

1.1.1 The Flintshire Local Development Plan, adopted in 2023 (covering the period 2015 to 2030) contains the following policies that are relevant to NBB (Ref 11):

- STR13: Natural and Built Environment, Green Networks and Infrastructure; and
- STR14: Climate Change and Environmental Protection.

1.1.2 The following key points within Policy STR13 are considered relevant to this GI Statement: '*Development should:*

- *protect open countryside and the undeveloped coastline;*
- *protect the open character and appearance of green wedges;*
- *conserve, protect and enhance the quality and diversity of Flintshire's natural environment including landscape, biodiversity, the Dee Estuary and the Clwydian Range and Dee Valley AONB;*
- *promote opportunities to enhance biodiversity and ensure resilience;*
- *maintain, enhance and contribute to green infrastructure;*
- *create and protect green spaces and open space / play environments that encourage and support good health, well-being and equality;*
- *conserve, protect and enhance the local distinctiveness and quality of Flintshire's built and historic environment including listed buildings, conservation areas, registered historic parks, gardens and landscapes, scheduled ancient monuments and other locally important historic assets;*
- *make financial contributions where appropriate, to facilitate and maintain the favourable conservation status of key environmental assets;*
- *support measures to minimise the consequences of climate change.'*

1.1.3 The following key points within Policy STR14 are considered relevant to this GI Statement:

'The Council will seek to mitigate the effects of climate change and ensure appropriate environmental protection in the County through:

- *ensuring new development is sustainably located and designed so as to reduce the need for travel by private car;*
- *encouraging the use and development of appropriate or suitable brownfield land;*
- *adopting a sustainable approach to water resource management including supply, surface water run-off and waste water treatment;*
- *directing development away from flood risk areas, assessing the implications of development in areas at risk of flooding and ensuring that new development does not increase the risk of flooding elsewhere;*
- *encouraging energy efficient development, environmentally acceptable renewable and zero / low carbon energy generation and combined heat and power and communal / district heating networks;*
- *ensuring that new development has regard to the protection of the environment in terms of air, noise and light pollution, unstable and contaminated land and former landfill sites;*
- *designing development to be adaptable and resilient to future effects of climate change.'*

Denbighshire Local Planning Policy

1.1.4 An area of off-site compensation has been identified to support the temporary and permanent impact of habitats that cannot be compensated for within the Order limits, inclusive of an area of functionally linked land (FLL), to support offsetting measures for Curlew (*Numenius Arquata)* and qualifying ecological features within the Dee Estuary / Aber Dyfrdwy Special Protection Area (SPA) / Ramsar site (see paragraph 1.1.1). The Off-Site Delivery Area is located within Prestatyn and falls under Denbighshire County Council (DCC). For further details on off-site delivery see the **Offsite NBB and GI Strategy** (**EN010166/APP/6.14**) and the **Outline Curlew Implementation and Monitoring Plan** (**EN010166/APP/6.13**).

1.1.5 The Denbighshire Local Development Plan is currently under review and pending updates. In the interim the adopted local development plan (2006-2021) (Ref 28) has been used to identify opportunities for biodiversity within the local area. The following policies are relevant for NBB:

- Policy RD 1 Sustainable development and good standard design;
- Policy VOE 1 Key areas of importance;
- Policy VOE 2 Area of Outstanding natural beauty and area of outstanding beauty; and
- Policy VOE 5 Conservation of natural resources.

1.1.6 In addition, the Denbighshire supplementary planning guidance on Conservation and Biodiversity Enhancement (Ref 13) has been applied to relevant habitat enhancement works within the compensation area.

Area Statements

1.1.7 Natural Resources Wales (NRW) has produced Area Statements under Section 11 of the Environment (Wales) Act 2016 (Ref 5) to implement the National Natural Resources Policy (Ref 14). Each Area Statement outlines the key challenges facing localities and provides guidance on what can be done to meet those challenges and how natural resources can be better managed. Area Statements should be used as an important source of information for planning of green infrastructure and net benefit (Ref 15).

1.1.8 The Order limits and Off-Site Delivery Area fall within the North East Wales Area Statement (Ref 16), which identifies five key themes:

- Climate Emergency: Resilience and Adaptation;
- Develop and Improve Urban/Rural Green Infrastructure;
- Increasing Woodland Cover for Social, Environmental and Economic Benefits;
- Promoting the Resilience of Ecosystems in Maintaining and Enhancing Biodiversity; and
- Protecting Water and Soil through Farming and Sustainable Land Management.

1.1.9 Relevant opportunities identified include:

- developing resilient ecological networks;
- improving the quality and quantity of water;
- improving the management of existing woodlands and more widespread use of trees;
- safeguarding and increasing carbon stores in soils and biomass;
- maintaining, enhancing and creating riparian zones;
- increasing urban tree canopy; and
- improve opportunities for community growth and delivery of green infrastructure at a community level.

National Planning Policy Statements for Energy

1.1.10 The National Policy Statements (NPS) for Energy (NPS EN-1 to NPS EN-5) (Ref 17) provide the primary basis for decision-making on applications for relevant energy NSIPs (where accepted for examination before 6 January 2026) by the Secretary of State.

1.1.11 NPS EN-1 sets out overarching policy requirements for energy NSIPs required to achieve the Government's statutory commitments for net zero. Carbon Capture and Storage (CCS) infrastructure is recognised in the NPS as infrastructure of 'critical national priority (CNP)'. This reflects infrastructure that is a critical requirement for both energy security and net zero. Section 3.3.63 of EN-1 states '*Subject to any legal requirements, the urgent need for CNP Infrastructure to achieving our energy objectives, together with the national*

security, economic, commercial, and net zero benefits, will in general outweigh any other residual impacts not capable of being addressed by application of the mitigation hierarchy. Government strongly supports the delivery of CNP Infrastructure, and it should be progressed as quickly as possible' (Ref 18).

1.1.12 NPS EN-1 Section 1.3.5 states 'Where the need for a particular type of energy infrastructure set out above is established by this NPS, but that type of infrastructure is outside the scope of one of the technology specific NPSs, this NPS (EN-1) alone will have effect and will be the primary basis for Secretary of State decision making. This will be the case for, but is not limited to, unconventional hydrocarbon extraction sites, hydrogen pipeline and storage infrastructure, Carbon Capture Storage (CCS) pipeline infrastructure and other infrastructure not included in EN-2 or EN-3.' (Ref 19; Ref 20).

Context of Wales

1.1.13 NPS EN-1 includes requirements which reflect planning policy in the devolved nations. It states in section 1.4.1 'The Secretary of State will decide all applications for NSIPs in England and Wales, adjacent territorial waters or in the UK Renewable Energy Zone (REZ) (defined in section 84(4) of the Energy Act 2004) (Ref 21) except any part in relation to which Scottish Ministers have functions.'

1.1.14 Section 1.4.3 provides further direction relevant to Wales, stating, 'The Secretary of State has no functions in relation to planning applications in Wales that do not relate to nationally significant infrastructure. In Wales, the Secretary of State will not examine applications for LNG facilities, gas reception facilities or gas transporter pipelines. The Secretary of State will only examine applications for underground gas storage facilities in Wales, where the applicant is a licensed gas transporter, and the storage is in natural porous strata (rather than in cavities); precise details are set out in EN-4 (Ref 22) and section 17 of the Planning Act 2008' (Ref 23) and 'The Secretary of State will only examine electricity generating stations in Wales, in territorial waters adjacent to Wales or in the Welsh Zone if their capacity is greater than 350MW (s1.4.4).'

1.1.15 As stated in the Connah's Quay Low Carbon Power Scoping Report (Planning Inspectorate (PINS) reference EN010166), 'The Proposed Development falls within the definition of NSIP under Sections 14(1)(a) and 15(1) and (3A) of the 2008 Act as it is for the construction of an onshore generating station in Wales, that does not generate electricity from wind, and which has a capacity of more than 350 megawatts (MW).' Therefore, NPS EN-1 to EN-4 apply to the Proposed Development.

Environmental and biodiversity net gain

1.1.16 NPS EN-1 section 4.6 provides direction for NSIPs on environmental and biodiversity net gain (Ref 18).

1.1.17 It states 'Energy NSIP proposals, whether onshore or offshore, should seek opportunities to contribute to and enhance the natural environment by providing net gains for biodiversity, and the wider environment where possible' (s4.6.6).

1.1.18 NPS EN-1 recognises the differences in approach to quantifying net gains in the devolved nations, reflecting the following for England and Wales respectively in sections 4.6.7 and 4.6.9:

- *'In England applicants for onshore elements of any development are encouraged to use the latest version of the biodiversity metric to calculate their biodiversity baseline and present planned biodiversity net gain outcomes. This calculation data should be presented in full as part of their application.'*
- *'In Wales, applicants should consider the guidance set out in Section 6.4 of Planning Policy Wales and the relevant policies in the Wales National Marine Plan.'*

National Planning Policy (Wales)

1.1.19 The Environment (Wales) Act 2016 sets out the legal framework for the management of Wales' natural resources (Ref 5). It delivers against the Welsh Government's Programme for Government commitment to introduce new legislation to protect the environment. This positions Wales as a low-carbon, green economy, ready to adapt to the impacts of climate change. Section 6 under Part 1 of the Environment (Wales) Act introduced an enhanced duty (the 'S6 duty' or 'Section 6 Duty') for public authorities in the exercise of functions in relation to Wales (Ref 5; Ref 24). The S6 duty requires that public authorities '*must seek to maintain and enhance biodiversity so far as consistent with the proper exercise of their functions and in so doing promote the resilience of ecosystems'*.

The Well-Being of Future Generations (Wales) Act 2015

1.1.20 The Well-being of Future Generations (Wales) Act 2015 aims to improve the social, economic, environmental, and cultural well-being of Wales (Ref 7). The Act emphasises the importance of maintaining and enhancing biodiversity to ensure ecosystem resilience and sustainability for future generations.

Planning Policy Wales. Edition 12 (2024)

1.1.21 PPW 12 sets out the land use planning policies of Welsh Government Ref 8). It is supplemented by a series of Technical Advice Notes (TANs) (Ref 25). Welsh Government Circulars, and policy clarification letters, which together with PPW provide the national planning policy framework for Wales. PPW 12 sets out the importance of delivery of NBB and GI, aligning with Section 6 under the Environment Act (Wales) 2016 (Ref 5). The following must be included and submitted within the planning process in Wales:

- Paragraph 6.2.1 states that '*Green Infrastructure is the network of natural and semi-natural features, green spaces, rivers and lakes that intersperse and connect places. Green Infrastructure can function at a range of different scales; from entire ecosystems such as wetlands and rivers to parks, fields and gardens at the local scale and street trees, hedgerows, roadside verges, and green roofs/walls at the micro scale*'.

- Paragraph 6.2.5 states that '*planning authorities must, as part of adopting a strategic and proactive approach to green infrastructure, biodiversity and ecosystems resilience, produce up to date inventories and maps of existing green infrastructure and ecological assets and networks*'. Green Infrastructure Assessments provide key evidence to support the preparation of development plans and where authorities are not already actively undertaking assessments, they should be undertaken as part of development plan preparation.
- Paragraph 6.4.5 states that '*Planning authorities must seek to maintain and enhance biodiversity in the exercise of their functions. This means development should not cause any significant loss of habitats or populations of species (not including non-native invasive species), locally or nationally and must work alongside nature and it must provide a net benefit for biodiversity and improve, or enable the improvement, of the resilience of ecosystems. A net benefit for biodiversity is the concept that development should leave biodiversity and the resilience of ecosystems in a significantly better state than before, through securing immediate and longterm, measurable and demonstrable benefit, primarily on or immediately adjacent to the site'*.

1.1.22 The Stepwise Approach and DECCA Framework should be used as methods to deliver a Net Benefit for any development.

Future Wales - The National Plan (2040)

1.1.23 Future Wales: The National Plan 2040 ('Future Wales') is the National Development Framework for Wales (Ref 9). Future Wales sets out the spatial strategy for growth and development in Wales. Green Infrastructure is set out as a 'Strategic Placemaking Principal' in which *'Through Green Infrastructure Assessments, specific opportunities should be identified to ensure that green infrastructure is fully integrated*.'

1.1.24 Future Wales includes 'Policy 9 - Resilient Ecological Networks and Green Infrastructure' which states:

- *'to ensure the enhancement of biodiversity, the resilience of ecosystems and the provision of green infrastructure, the Welsh Government will work with key partners to:*
  - *identify areas which should be safeguarded and created as ecological networks for their importance for adaptation to climate change, for habitat protection, restoration or creation, to protect species, or which provide key ecosystems services, to ensure they are not unduly compromised by future development; and*
  - *identify opportunities where existing and potential green infrastructure could be maximised as part of placemaking, requiring the use of nature based solutions as a key mechanism for securing sustainable growth, ecological connectivity, social equality and wellbeing. based solutions as a key mechanism for securing sustainable growth, ecological connectivity, social equality and wellbeing.*

– *planning authorities should include these areas and/or opportunities in their development plan strategies and policies in order to promote and safeguard the functions and opportunities they provide. In all cases, action towards securing the maintenance and enhancement of biodiversity (to provide a net benefit), the resilience of ecosystems and green infrastructure assets must be demonstrated as part of development proposals through innovative, nature-based approaches to site planning and the design of the built environment.'*

1.1.25 A summary of these relevant local and national planning policies as well as legislation is provided in **Appendix C**.

1.1.26 For further detail relating to each specific policy, please refer to the policies themselves. This planning policy has been considered when assessing potential ecological constraints and opportunities identified by the desk study and field surveys; and, when assessing requirements for design options and ecological mitigation.

2. Assumptions and Limitations

2.1 Baseline Assumptions and Limitations

2.1.1 Habitats indicated within the baseline have been recorded using UKHab habitat survey methodology. In certain areas, baseline data has been inferred using desk-based evidence due to land access restrictions on-site. All on-site habitat was identified through on-site field observation surveys, where possible, see **Chapter 11: Terrestrial and Aquatic Ecology (EN010166/APP/6.2.11)**.

2.1.2 Surveys to date are reported in species-specific appendices (**Appendices 11-C: Botanical Technical Appendix** to **11-K: Aquatic Ecology Technical Appendix** and **Appendix 5-B: Environmental Screening of the Hardstanding Expansion at Connah's Quay North Jetty (EN010166/APP/6.4)**, Annex B – Ecological Walkover **(EN010166/APP/6.4)** of the ES). The assumptions and limitations associated with these species-specific surveys or assessments are presented in the relevant appendix.

2.1.3 Habitats of Principal Importance (HoPI) and Section 7 Priority Habitats[2] were identified by DataMap Wales (Ref 26), UK Biodiversity Action Plan Habitat description (Ref 26) and confirmed by on-site field observations. Several habitats have been classified as Section 7 Priority Habitat. To meet the definition of Section 7 Priority Habitat, the UK Biodiversity Action Plan (Ref 26) criteria has been used to assess the habitats listed in Section 3.4.

2.1.4 Ancient and Veteran trees have been identified using Data Map Wales Ancient Woodland Inventory. For further information on the categorisation of Ancient and Veteran trees, please refer to **Appendix 15-G: Arboricultural Impact Assessment (EN010166/APP/6.4**) of the **ES**.

2.1.5 Baseline data of individual trees have been taken from **Appendix 15-G: Arboricultural Impact Assessment** (**EN010166/APP/6.4**) of the **ES**, and cross referenced with the UKHab survey data. Arboriculture surveys were conducted in accordance with the requirements of BS5837:2012 Trees in relation to design, demolition and construction - Recommendations (BS5837) (Ref 27). For general Arboriculture assumptions and limitations in reference to survey findings and methodology used, please refer to **Appendix 15-G: Arboricultural Impact Assessment** (**EN010166/APP/6.4**) of the **ES**.

2.1.6 An area of Open Mosaic Habitat (OMH) has been identified within the Order limits. To meet the definition of OMH the following criteria has been met:

- the area of OMH is at least 0.25 ha in size;
- known history of disturbance at the site or evidence that soil has been removed or severely modified by previous use(s) of the site. Extraneous materials/substrates such as industrial spoil may have been added;

[2] A Section 7 (S7) Priority Habitat in Wales refers to a habitat type that has been identified as being of "Principal Importance" for the purpose of maintaining and enhancing biodiversity under the Environment (Wales) Act 2016 (Ref 5).

- the site contains some vegetation. This will comprise early successional communities consisting mainly of stress-tolerant species (e.g. indicative of low nutrient status or drought). Early successional communities are composed of (a) annuals, or (b) mosses/liverworts, or (c) lichens, or (d) ruderals, or (e) inundation species, or (f) open grassland, or (g) flower-rich grassland, or (h) heathland;
- the site contains unvegetated, loose bare substrate and pools may be present; and
- the site shows spatial variation, forming a mosaic of one or more of the early successional communities (a)–(h) above (criterion 3) plus bare substrate, within 0.25 ha.

2.2 Post-Works Assumptions and Limitations

2.2.1 Areas of permanent and temporary impact and retainment of habitats have been determined using the Order limits, and relevant documents (see Section 1.3). The following assumptions have been applied for this GI Statement (see **Table 2-1** for a summary):

- Construction based on the Phased Construction scenario: The construction of the Proposed Development could be undertaken in a combined simultaneous or phased approach (see **Chapter 4: The Proposed Development** (**EN010166/APP/6.2.4**)) of the ES. The worst-case scenario is considered to be the phased approach which will involve one phase occurring after the other, lasting up to nine (9) years. This has been applied to this assessment. It is assumed that this construction method has the greatest impact on important ecological features (IEFs) as the effects will be experienced over a greater period. Habitats impacted within the 9-year construction phase (and reinstated post-construction) would be classified as permanently lost and created (hereinafter referred to as 'temporary loss'); Exceptions to the 9 year construction period are detailed below and presented in **Table 1**.
- Construction Impacts: As the construction approach and activities are to be refined through the detailed design process, a worst-case scenario has been applied. All habitats within the footprint of the temporary construction laydown areas within the Main Development Area (i.e. those outside of the operational footprint of the Proposed Development) have been considered as being temporarily lost for this assessment and either reinstated or created after 9 years.
  - All ecological information has been considered when classifying these long term impacts as temporary. The use of the term temporary has been taken as an approach to acknowledge that the habitats in these locations will be reinstated (i.e. the effect is reversible), the assessment does however take into account the duration of time over which these habitats will be removed (9 years, plus re-establishment time following habitat creation) and assesses impacts accordingly.
- Areas within the operational footprint of the Proposed Development would be permanently lost;

- The Proposed CO_2 pipeline within the Proposed CO_2 Connection Corridor will tie into the Flint AGI which has already been" consented under The HyNet Carbon Dioxide Pipeline Order 2024. Habitats within the working corridor and compounds required to install the Proposed CO_2 pipeline fall within an area consented as part of The HyNet Carbon Dioxide Pipeline Order 2024 are therefore excluded from this assessment. The works to install the Proposed CO_2 pipeline would take approximately 9 months to complete.
- Flint Above Ground Installation (AGI): The Proposed CO_2 pipeline within the Proposed CO_2 Connection Corridor will tie into the Flint AGI which has already been consented as part of the HyNet Carbon Dioxide Pipeline project (PINS reference EN070007). Habitats within the AGI footprint and consented as part of the HyNet DCO are therefore excluded from this assessment;
- Construction within the Water Connection Corridor: All works within the Water Connection Corridor would be completed using handheld power tools. Working areas would be accessed by foot over the saltmarsh and required materials would be brought in by a support barge. There would be no impact to the river bed, works would be temporary (three to five months in duration). These habitats are classified as temporarily lost and reinstated;
- Surface Water Outfall: A new permanent outfall structure (headwall) for surface water drainage discharge would be constructed adjacent to the pre-existing outfall structure. The final design of the proposed surface water outfall will be subject to various technical assessments to identify appropriate design. For this assessment, a worse-case scenario has been considered to assess impact to habitats surrounding the construction of the new surface water outfall. A 10 m buffer around the existing artificial structure has been included to allow for access and additional permanent artificial structure. These habitats are classified as temporarily lost and reinstated. A small area of saltmarsh is likely to be permanently impacted (maximum of 5 m^2) by the proposed surface water outfall. Permanent loss has been informed by current design and professional judgment in regard to the pressures and likely ecological impact surrounding this area of saltmarsh. Habitats are classified as being permanently lost. Please see Section 6.2 for further details;
- Relocation of the Contractors' Facilities: The relocation of the existing contractors' facilities (comprising temporary modular structures) associated with the existing Connah's Quay Power Station to allow their existing function to continue. The contractors' facilities are likely to include parking areas and a mix of temporary modular structures depending on contractor requirements. This area has recently been partially cleared by National Grid. Works would begin with the clearance of the remaining scrub to provide open access across the area. Ground preparation would follow, involving the removal of topsoil and placement of a compacted hardcore or MOT Type 1 base (graded sub-base designed to compact to a load-bearing surface). A tarmac finish is preferred, and any new impermeable areas would be drained into the

existing Connah's Quay Power Station surface water network. Whilst the contractors' facilities are semi-permanent the compacted hardcore or tarmac ground preparation will be permanent. As such this habitat would be permanently lost, this includes 0.56 ha of modified grassland, 0.64 ha of mixed scrub and 0.08 ha of introduced scrub. Please see Section 6.1 for further details;

- Hardstanding Expansion at Connah's Quay North Jetty: An expansion of the existing area of hardstanding at Connah's Quay North Jetty is required to provide necessary flexibility for equipment deliveries during the construction phase. The extension would be divided into two sections: one approximately 50 m by 16 m (800 m²) and another 62.5 m by 16 m (1000 m²). The existing off-loading area measures approximately 16 m by 16 m, providing 256 m² of space. The proposal is to extend this area by roughly 1,800 m², increasing the total area to about 2,056 m² (as shown on **Appendix B - Figure 4: Permanent and Temporary Loss of Habitats**). This would result in the loss of 0.10 ha of other neutral grassland, 0.07 ha of mixed scrub and 0.02 ha of hardstanding and one individual tree. As the expansion may or may not be reinstated to its current condition following use as part of the Proposed Development, this GI Statement has considered the habitat losses associated with the expansion to be permanent on a worst-case basis;
- Ecological Safeguard Zones: Habitats of ecological importance, identified within **Appendix B - Figure 4: Permanent and Temporary Loss of Habitats** are classified as retained, where they are impacted by temporary works the area would return to the existing condition within a short period;
- Where ancient and veteran trees have been identified and would be crossed by the Proposed Development, a 15 m root protection area (RPA) buffer would be applied to prevent loss of ancient and veteran trees. See **Appendix 15-G: Arboriculture Impact Assessment** (**EN010166/APP/6.4**) for further details. These habitats are classified as retained;
- Accommodation Work Areas: These areas are excluded from this assessment, as the works would be limited in scale and would not result in permanent changes to habitats;
- All mitigation specific to habitats and species is secured by the **Framework Construction Environmental Management Plan (CEMP)** (**EN010166/APP/6.5**).

Table 2-1: A Summary of Construction Timescales, Assumptions and Impact Prescriptions

Works Area	Construction Timescale	Permanent, Temporary, No Impact
Proposed CO_2 Connection Corridor	Excluded as considered as the post development landscaping of this area is considered within the	

Works Area	Construction Timescale	Permanent, Temporary, No Impact
	reporting included as part of the consented Hynet DCO.	
Flint Above Ground Installation (AGI):	Excluded as considered as the post development landscaping of this area is considered within the reporting included as part of the consented Hynet DCO.	
Construction within the Water Connection Corridor	3–5-month construction programme	Temporary Loss
Surface Water Outfall	Up to 6-month construction phase	Temporary Loss
	Permanent	Permanent loss (maximum of 5 m^2)
Relocation of the Contractors' Facilities	3 months construction programme	Permanent Loss
Hardstanding Expansion at Connah's Quay North Jetty	1 to 2 month construction programme	Permanent Loss
Ecological Safeguard Zone	Up to 9-year construction phase	Retained
All development for Ancient and Veteran Trees	Up to 9-year construction period	Retained

2.2.2 There will be localised short term temporary impacts to habitats within the Ecological Safeguard Zone, these have not been accounted for within this report as they will be reinstated back to baseline habitat, condition and ecological function within a short period of time after the initial impact.

2.2.3 When considering the loss of these habitats on species the availability of surrounding habitat was considered. Where no significant effects were reported for species utilising habitat that would be lost for up to 9 years and reinstated post construction it was because they had other habitat available to the population during the construction phase, enabling recolonisation post construction.

2.2.4 For further details in relation to the Proposed Development see **Chapter 4 The Proposed Development** (**EN010166/APP/6.2.4**).

2.3 Decommissioning Assumptions and Limitations

2.3.1 Decommissioning activities would be conducted in accordance with the appropriate guidance and legislation in force at the time of decommissioning.

A Decommissioning Plan (including a Decommissioning Environmental Management Plan (DEMP)) would be produced at the time of decommissioning, pursuant to Requirement 17 of the **Draft DCO** (**EN010166/APP/3.1**).

2.3.2 It is not anticipated that the decommissioning of the Proposed Development would impact on the overall net benefit and GI created within the Order limits, therefore the decommissioning of the Proposed Development is not assessed further.

3. Baseline Site Assessment

3.1 Overview

3.1.1 The identification of existing GI assets and networks and understanding of existing biodiversity assets forms an essential step in this assessment. The baseline conditions for the Proposed Development at Connah's Quay are detailed in the following datasets and reports, and have been considered in this assessment:

- Datasets:
- LANDMAP Landscape Habitats (Ref 28);
- Urban Tree Canopy Cover (Ref 29);
- Habitat Networks (Ref 45); and
- Supporting documents:
  - **Appendices 11-C: Botanical Technical Appendix** to **11-K: Aquatic Ecology Technical Appendix** (**EN010166/APP/6.4**) of the **ES**;
  - **Appendix 5-B: Environmental Screening of the Hardstanding Expansion at Connah's Quay North Jetty** (**EN010166/APP/6.4), Annex B – Ecological Walkover** of the **ES**;
  - **Chapter 11: Terrestrial and Aquatic Ecology** (**EN010166/APP/6.2.11**) of the **ES**;
  - **Appendix 15-G: Arboriculture Impact Assessment** (**EN010166/APP/6.4**); and
  - **Appendix B - Figure 4: Permanent and Temporary Loss of Habitats**.

3.1.2 Baseline habitats were collected using UKHab and Phase 1 methodology (for further details please refer to **Chapter 11: Terrestrial and Aquatic Ecology** (**EN010166/APP/6.2.11**) and **Appendix B – Figure 3: Indicative Landscape Plan**. This assessment is presented using UKHab codes. For UKHab to Phase 1 translations see **Appendix D.**

3.1.3 A baseline DECCA overview is presented in **Appendix E – DECCA Baseline Overview.**

3.2 Designated Sites

3.2.1 Designated sites (as defined in PPW 12) 'must be protected from damage and deterioration, with their important features conserved and enhanced by appropriate management. The contribution of the designated site to wider resilient ecological networks should be recognised and captured as part of a strategic approach to planning policy and decision making' (Ref 1).

3.2.2 'Development in a SSSI which is not necessary for the management of the site must be avoided', where impact cannot be avoided 'statutorily designated

sites should be protected from damage and deterioration, with their important features conserved and enhanced and the capacity for restoration demonstrated by and through appropriate management' (Ref 5).

3.2.3 The following designated sites lie within the Order limits:

- The Dee Estuary SPA;
- The Dee Estuary Ramsar;
- The Dee Estuary / Aber Dyfrdwy SAC; and
- The Dee Estuary / Aber Dyfrdwy SSSI.

3.2.4 No locally designated non-statutory sites are present within the Order limits.

3.2.5 For full details of designated sites within 10 km of the Proposed Development, and within 5 km for other statutory designated sites of nature conservation value refer to **Chapter 11: Terrestrial and Aquatic Ecology (EN010166/APP/6.2.11)** and **Figure 11-1: Statutory Designated Sites within 15 km of the Proposed Development** (**EN010166/APP/6.3**) of the **ES**.

3.3 Irreplaceable Habitat

3.3.1 Irreplaceable habitats (as defined in PWW 12) are 'habitats, including the natural resources which underpin them, which would be technically very difficult (or take a very significant time) to restore, recreate or replace once destroyed, considering their age, uniqueness, species diversity or rarity. Examples include ancient woodland and veteran trees, ancient hedgerows, wet woodlands, sand dunes, peatland, species-rich grassland, long undisturbed soils, blanket bog, salt marsh and lowland fen' (Ref 1).

3.3.2 The following irreplaceable habitats have been identified on-site:

- Coastal Saltmarsh (t2a), part of the Dee Estuary / Aber Dyfrdwy SAC and SSSI;
- Ancient Trees; and
- Veteran Trees.

3.3.3 Nine veteran and four ancient trees have been identified within the Order limits. Please see **Appendix 15-G: Arboriculture Impact Assessment** (**EN010166/APP/6.4**) for further details.

3.3.4 The design of the Proposed Development has sought to avoid impacts on irreplaceable habitat within the Order limits. However, further mitigation detailed in the **Framework CEMP** (**EN010166/APP/6.5**) will be put in place to reduce any impact on irreplaceable habitat within the Order limits which cannot be avoided during construction.

3.4 S7 Priority Habitats

3.4.1 Section 7 of the Environment Act (Wales) 2016 lists habitats of principal importance for the purpose of maintaining and enhancing biodiversity in Wales

(Ref 5) Developers are required to take all reasonable steps to maintain and enhance habitats, included in Section 7 (Ref 1).

3.4.2 The following Section 7 Priority Habitats have been identified on-site:

- Intertidal mudflats (t2d);
- Lowland mixed deciduous woodland (w1f7);
- Species rich native hedgerow (h2a5);
- Open mosaic habitats on previously developed land (u1f[3]);
- Coastal saltmarsh (t2a);
- Other rivers and streams (r1g);
- Other neutral grassland (g3c); and
- Species rich native hedgerow (h2a5).

3.5 Habitats

3.5.1 As indicated on **Appendix A - Figure 2: Baseline Habitats**, the following habitats with their UKHab habitat codes are present within the Order limits:

- Coastal saltmarsh (t2a);
- Intertidal mudflats (t2d);
- Modified grassland (g4);
- Other neutral grassland (g3c);
- Bracken (g1c);
- Mixed scrub (h3h);
- Bramble scrub (h3d);
- Other cereal crops (c1c7);
- Purple Moor grass and rush pastures (f2b);
- Other rivers and streams (r2b);
- Other lowland mixed deciduous woodland (w1f7);
- Other broadleaved woodland (w1g);
- Suburban mosaic of Developed and natural surface (u1d);
- Sparsely vegetated urban land (u1f[4]);
- Artificial unvegetated, unsealed surface (u1c);
- Developed land sealed surface (u1b);
- Introduced shrub (u1[5])

[3] Secondary code 80 – Open mosaic habitats on previously developed land
[4] Secondary code (81) Ruderal or ephemeral
[5] Secondary code (847) Introduced shrub

- Open Mosaic Habitat on previously developed land (u1f[3]);
- Buildings (u1b5);
- Line of trees (w1g[6]);
- Non-native and ornamental hedgerow (h2b);
- Species rich native hedgerow (h2a5) (Priority Habitat); and
- Other native hedgerow (h2a6).

3.6 Species

3.6.1 Species present, or potentially present within surrounding habitat are summarised in **Table 3-1**.

3.6.2 The ornithological features and species relevant to this assessment are described in Section 5.2 of **Appendix 11-D: Ornithology Technical Appendix (EN010166/APP/6.4)** and **Chapter 11 Terrestrial and Aquatic Ecology (EN010166/APP/6.2.11)** of the ES.

3.6.3 Further information on the ecological features scoped out of this assessment can be found in the Preliminary Ecological Appraisal (PEA) which is included as **Annex F** of **Appendix 11-C: Botanical Technical Appendix** (**EN010166/APP/6.4**).

Table 3-1: Species present within the Order limits and surrounding habitat

Species Type	Species of Principal Importance	Present within the Order limits/ non present
Birds	Yes	Species present within the Order limits and surrounding habitat. Priority species are as follows: • Eurasian curlew is present within the Order limits; and • Bar tailed gowit, Golder plover and Ringed plover are present within 120 m of the Order limits.
Bats	Yes	Species present within the Order limits
Badger	No	Suitable habitats present within the Order limits.
Great Crested Newts (GCN)	Yes	Suitable habitats surrounding the Order limits.
Reptiles	Yes	Species present within the Order limits.

[6] Secondary code (33) Line of trees

Species Type	Species of Principal Importance	Present within the Order limits/ non present
Otter	Yes	Suitable habitats present within the Order limits and surrounding habitat.
Terrestrial Invertebrates	Yes	Suitable habitats present within the Order limits.
Hedgehog	Yes	Suitable habitats present within the Order limits.
Fish	Yes	Species present within the Order limits.

3.7 Public Rights of Way

3.7.1 Several Public Right of Way (PRoW) are present within the Order limits. This is shown in **Figure 15-5: Public Rights of Way** (**EN010166/APP/6.3**).

3.8 Watercourses

3.8.1 Several surface water bodies (rivers and ditches) are present within the Order limits, notably Old Rockcliffe Brook, and Oakenholt Brook. For further information, please refer to **Chapter 13: Water Environment and Flood Risk** (**EN010166/APP/6.2.13**) and **Figure 13-1: Surface Water Features** (**EN010166/APP/6.3**) of the **ES**.

4. Methodology

4.1 Consultation

4.1.0 An Environmental Impact Assessment (EIA) Scoping Opinion (**Appendix 1-B EIA Scoping Opinion** (**EN010166/APP/6.4**)) was issued by the Secretary of State (SoS) through PINS in February 2024 as part of the EIA Scoping Process. The EIA Scoping Opinion (**Appendix 1-B EIA Scoping Opinion** (**EN010166/APP/6.4**)) directly commented on the approach to assessing NBB and GI. It was agreed that a qualitative approach to NBB and GI be applied in relation to the Stepwise Approach and DECCA framework. For further detail relating to the Applicant's responses to the EIA Scoping Opinion refer to **Table 11-2** of **Chapter 11: Terrestrial and Aquatic Ecology** (**EN010166/APP/6.2.11**) of the **ES**.

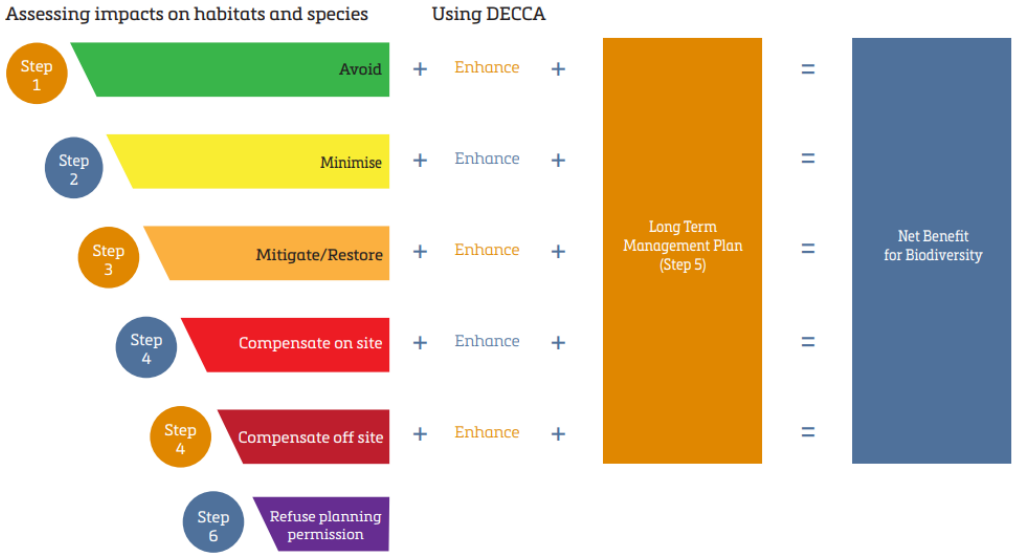
4.1.1 Further engagement has occurred with NRW and FCC surrounding the approach to NBB and GI for the Proposed Development. Both consultees were in favour of the Stepwise Approach and DECCA framework, as a result, this methodology has been used to inform this assessment.

4.2 Stepwise Approach

4.2.1 The Proposed Development has been designed in accordance with the Stepwise Approach (see Section 5). Biodiversity restoration, enhancements or creation that achieve NBB must be delivered following the implementation of the Stepwise Approach.

4.2.2 The Stepwise Approach sets out the steps in order of priority (see **Plate 1**) to ensure that adverse effects of a development on biodiversity are reduced. The measures undertaken at each step must be incorporated with enhancement measures and the principles of the DECCA Framework to ensure a net benefit for biodiversity is achieved.

Plate 1: Stepwise Approach (Source: Planning Policy Wales (Ref 1))



4.2.3 The Proposed Development must adhere to the following steps highlighted within the Stepwise Approach:

- Step 1 - the first priority is the avoidance of impacts on biodiversity;
- Step 2 - if avoidance is not possible, adverse impacts to biodiversity must be minimised, by reducing the size of Proposed Development and maintaining the connectivity of habitats. Impacts must also be minimised for Section 7 Priority Habitats and features used by Section 7 species to ensure their populations are maintained;
- Step 3 - if impacts cannot be avoided or sufficiently minimised then adverse effects to biodiversity must be mitigated against, and/ or habitats and features for species restored. The mitigation and restoration must target the specific adverse effects of the Proposed Development, seek to restore in excess of like-to-like, and account for factors like time lags in recovery of habitats and species populations;
- Step 4 - when these first three steps have been exhausted, compensation on-Site (4a), or off-Site (4b) if not otherwise feasible, is required. Compensation must always be a last resort and must be of significant magnitude to fully compensate for any loss, be place based, and take account of the Section 6 Duty, the DECCA framework and appropriate ecological advice from the local authority ecologist, NRW or a suitably qualified ecologist;
- Step 5 - a Long-Term Management Plan should be produced setting out the management of the site and future monitoring arrangements for all secured measures. The management plan must identify the funding mechanisms in place to meet the management plan objectives and the achievement of net benefits for biodiversity; and
- Step 6 - failure to action any of these steps will result in not complying with PPW 12 requirement, identified within the NPS, which will be

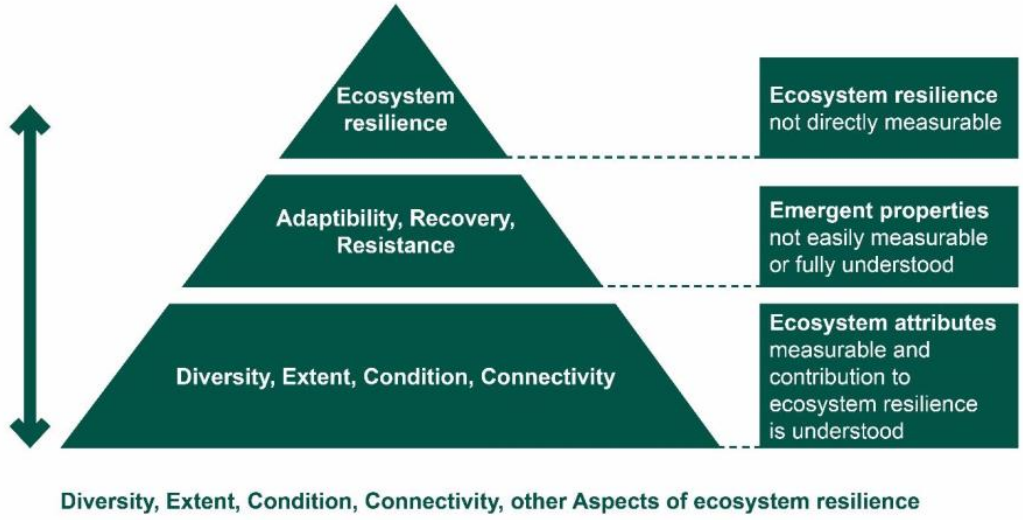
considered to be material within the decision making of the DCO application.

4.3 DECCA Framework

4.3.1 PPW 12 defines 'ecosystem resilience' as 'the capacity of ecosystems to deal with disturbances, either by resisting them, recovering from them, or adapting to them, whilst retaining their ability to deliver services and benefits now and in the future' (Disturbances are interpreted to mean pressures and demands on the ecosystem)' (Ref 1). NRW has developed a framework for evaluating ecosystem resilience based on five attributes and properties specified in the Environment (Wales) Act 2016 (Ref 5), referred to as the DECCA Framework (see **Plate 2**) (Ref 8). The DECCA framework comprises the following objectives:

- diversity at all scales including genetic, species, habitat and ecosystems or landscape scale;
- extent of ecosystems and habitats;
- condition of ecosystems and biodiversity, including their structure and functioning;
- connectivity between and within ecosystems and habitats; and
- adaptability to change to identify impacts and enhance ecosystem resilience.

Plate 2: DECCA Framework (Source: Terrestrial and freshwater Resilient Ecological Networks: a guide for practitioners in Wales (Ref 31)



4.4 Building with Nature Standards

4.4.1 PPW 12 requires the submission of a proportionate GI Statement, signposting the BwNSF 2.0 (Ref 10) and NRW guide to assessing green infrastructure (Ref 32). The twelve (12) standards provide a pathway for and recognition of early and sustained engagement in the design, implementation and long-term stewardship of high-quality GI. The standards, set out in **Table 4-1**, focus on the opportunities to put existing and planned-for habitat and wildlife at the heart of development for the benefit of people and nature. Each Standard is defined by its purpose and key characteristics, which are presented in the form of questions. These questions have been used to inform how the design meets each Standard. Section 6.7 highlights the BwNSF 2.0 that has been used to inform the GI Statement.

Table 4-1: Building with Nature Standards Framework Themes

Building with Nature Standard Framework Theme	Description of Theme
Standard 1: Optimises Multifunctionality and Connectivity	*The green infrastructure optimises multifunctionality and connectivity within the boundary of the project and links with existing and planned for green infrastructure in the surrounding area.*
Standard 2: Positively Responds to the Climate Emergency	*The green infrastructure is designed to be climate resilient by incorporating mitigation and adaptations that respond to the impacts of climate change. The green infrastructure is designed to promote low carbon behaviours and contributes to achieving zero carbon development by optimising carbon sequestration and demonstrating low carbon approaches to design, construction and long-term maintenance.*
Standard 3: Maximises Environmental Net Gains	*The green infrastructure is designed to actively mitigate any unavoidable harmful environmental impacts of development on soil and air quality and to minimise light and noise pollution. In addition, it delivers environmental net gains, including improving air and water quality and wherever possible includes quiet spaces for people and wildlife.*
Standard 4: Champions a Context Driven Approach	*The green infrastructure positively responds to the local context, including the physical environment, such as landscape and urban character and social, economic and environmental priorities, including the evidenced needs and strengths of existing and future local communities.*
Standard 5: Creates Distinctive Place	*The green infrastructure is integral to the project and is designed to reinforce local distinctiveness and/or create a distinctive sense of place.*
Standard 6: Secures Effective Place-Keeping	*The green infrastructure is subject to management arrangements that demonstrate a commitment to effectively implement, establish and maintain features at all stages of the development process. This should include details of funding, governance, maintenance, monitoring, remediation and, where appropriate, community involvement and stewardship.*

Building with Nature Standard Framework Theme	Description of Theme
Standard 7: Brings Nature Closer to People	*The green infrastructure is close to where people live, work, learn, play and/or visit and is designed to optimise use and enjoyment for everyone across the year, to maximise health and wellbeing outcomes and to promote active living for existing and future communities.*
Standard 8: Supports Equitable and Inclusive Places	*The green infrastructure is designed to encourage and enable everyone, including those from vulnerable or excluded groups, to use and enjoy it, to help reduce health inequalities and to build a shared sense of community and belonging.*
Standard 9: Delivers Climate Resilient Water Management	*The green infrastructure is integral to sustainable drainage using above ground features to manage flood risk, maintain the natural water cycle and improve water quality within the boundary of the project and at a catchment scale. The green infrastructure is designed to be drought resistant and wherever possible, includes measures for the retention and reuse of rainwater*
Standard 10: Brings Water Close to People	*The green infrastructure is designed to integrate water, including areas of standing water, flowing water, seasonal and ephemeral features, to bring additional amenity and wildlife benefits.*
Standard 11 Delivers Wildlife Enhancement	*The green infrastructure optimises long term and climate resilient net benefits for nature, by retaining and enhancing existing ecological assets and creating locally relevant new habitats within the boundary of the project. Wildlife measures are secured at all stages of implementation and where applicable, across multiple phases of development.*
Standard 12 Underpins Nature's Recovery	*The green infrastructure creates effective links with existing and planned for ecological features and networks beyond the boundary of the project to support the creation and restoration of resilient ecological networks in the wider landscape.*

5. Consideration of Alternatives

5.1 Overview

5.1.1 This Section identifies how the Applicant has applied step 1 (avoid) and 2 (minimise) of the Stepwise Approach. Given the nature of the Proposed Development and constraints of the Proposed Development Site, consideration of options to avoid and minimise adverse biodiversity effects is directly tied to the alternatives for the Proposed Development itself.

5.1.2 **Chapter 6: Project Alternatives** (**EN010166/APP/6.2.6**) sets out the main alternatives that have been considered in relation to the Proposed Development. An iterative site selection process has been undertaken as well as a design refinement process considering reasonable alternatives. Alternatives have been considered during the evolution of the Proposed Development including:

- the 'do nothing' and 'do minimum' scenarios;
- alternative site locations;
- alternative designs, including alternative technologies; and
- alternative layouts.

5.2 Step 1 – Avoid

5.2.1 In the context of the stepwise approach, Step 1 is considered to be the consideration of alternative solutions to the Proposed Development in supporting the energy transition by developing low carbon, flexible, generation options in line with government policy.

The 'Do Nothing' and 'Do Minimum' Scenarios

5.2.2 The 'Do Nothing' scenario would mean the Proposed Development is not taken forward. This would result in the loss of generating capacity after the closure of the existing Connah's Quay Power Station. This would not align with the established national need for new low carbon energy infrastructure and the status of the Proposed Development as a Critical National Priority (CNP).

5.2.3 The Applicant also considered a Do Minimum scenario of installing Carbon Capture Plant (CCP) infrastructure to the existing Connah's Quay Power Station. This option would require the upgrade and replacement of internal components, plant and other equipment alongside the construction of other new infrastructure, including new stacks. This option was not considered to algin with the Proposed Development's Objectives.

5.2.4 It was concluded that both the Do Nothing and Do Minimum Scenarios do not present a reasonable alternative to the Proposed Development and therefore there are no alternative solutions which would avoid ecological impact altogether.

Alternative Site Locations

5.2.5 For the Main Development Area, alternative site locations within the existing Connah's Quay Power Station site were considered including replacement in situ (a direct replacement of the existing Connah's Quay Power Station), a north site and a south site. The 'north' site is the largest of the three areas at 24 hectares, and is physically constrained by overhead power cables, pipes and a gas pipeline. The south site is smaller, at 9.5 ha which is also constrained with overhead power cables and other electrical transmission infrastructure and proximity to the North Wales Main Line railway line.

5.2.6 Each of these locations were considered by the Applicant in terms of land availability, technical feasibility such as the ease of construction and operation, financial viability and environmental constraints, and whether there were likely to be significant environmental effect as a result of the construction, operation or decommissioning of the Proposed Development.

5.2.7 The north site was selected for the following key reasons, and is referred to as the Main Development Area:

- it allows project construction and delivery such that dispatchable, low carbon, power can be delivered from 2030, securing commercial viability;
- it maximises potential to fulfil policy need for dispatchable, low carbon power;
- it reduces proximity of the Proposed Development to receptors in Connah's Quay;
- it allows continued generation from the existing Connah's Quay Power Station during the construction period of the Proposed Development;
- the land area offers the potential for the Proposed Development to maximise the use of the connection to the National Grid;
- it offers good proximity to existing natural gas connection (minising the need for new connections);
- it offers good proximity to the proposed CO_2 export corridor (minising the need for new connections);
- it offers good proximity to cooling water infrastructure (minising the need for new connections); and
- it optimises the provision of laydown and construction areas.

5.2.8 It was also later determined that the south site would be required to facilitate the construction of the Proposed Development within the north site. The south site is referred to as the C&IEA.

5.2.9 The Proposed Development includes an appropriate degree of flexibility for a number of technical parameters that have yet to be finalised. The design process and feedback from the EIA process will continue to iteratively assess and improve upon the design of the Proposed Development, within the parameters assessed.

Alternative Technologies

5.2.10 The Applicant undertook a review of all possible technology options which could provide the generation of low carbon power.

5.2.11 The Applicant considered:

- technical feasibility of available infrastructure at the existing Connah's Quay Power Station site;
- technical and financial viability of technology options;
- sequencing with the HyNet Carbon Capture Underground Storage (CCUS) Cluster;
- emerging government business models to incentivise energy with CCS/CCUS development; and
- potential for the Proposed Development to be operational by 2030.

5.2.12 A CCGT generating station was selected as the preferred basis of design by the Applicant as it is supported by paragraph 3.3.17 of NPS EN-1 which notes the importance of quick start peaking capacity, which the Proposed Development would provide.

5.2.13 Alternative power generation cycles using carbon capture were investigated, but were not considered technically mature enough to be ready for operation by 2030 and so do not meet national energy goals.

5.2.14 Hydrogen fired power generation technology, whilst having the potential to deliver against these same policy goals, is not technically mature on large utility scale power plant and is also not currently adequately supported through funding schemes. Therefore, that technology also cannot currently be considered for commercial deployment in the timeline required for 2030 operation.

5.2.15 This process demonstrates there are no other alternative site locations or technological solutions which would avoid ecological impacts altogether.

5.3 Step 2 – Minimise

5.3.1 In the context of the stepwise approach, Step 2 is considered to be measures that have been taken following the selection of the preferred site and technology for the Proposed Development.

Alternative Design and Design evolution

5.3.2 Following the completion of a techno-economic assessment, a CCGT generating station was selected. These are suitable for generating low carbon electricity through a post-combustion CCP. This is supported by national planning policy.

5.3.3 The indicative linear layout of the Trains within the Main Development Area was selected to reduce the potential visual impact of the Proposed Development by grouping the elements with the greatest above ground height in close proximity to each other.

5.3.4 A number of design changes were made throughout the design stages to date due to further technical studies and assessment as well as in response to comments received during consultation. These are explained in detail within **Chapter 6: Project Alternatives** (**EN010166/APP/6.2.6**) of ES Volume II. Those relevant to this GI Statement are summarised below:

- Design Change #3 – amendment to remove the triangular extension on the western side of the Access to the Main Development Area, bordering the A548 and west of Kelsterton Road where a slip road was provided for the construction of the existing Connah's Quay Power Station.
  - This change minimised the impact of the Proposed Development by retaining an area of vegetation that would otherwise have been lost to create this access.
- Design Change #22 - the Applicant has removed the option for new cooling water abstraction and discharge infrastructure and the option for extensive/ intrusive refurbishment of existing cooling water infrastructure. The works within the River Dee would be limited to minor works to the existing cooling water abstraction infrastructure within the existing protection structure . The Order limits for the Water Connection Corridor has accordingly been reduced to include only the location of these works, required land-based access routes, the location of temporary barge moorings, and the existing land-based water intake pipes (to secure the right to future/continued use of the existing asset).
  - This change minimised the impacts of the Proposed Development on designated habitats within the Dee Esturary SAC by removing the need for the construction of new cooling water infrastructure.
- Design Change #24 - It was confirmed that no physical works would be required in the Repurposed CO_2 Connection Corridor. It has been retained in the Order limits, but with reduced width from a maximum of 100 m down to a maximum of 24.4 m.
  - This change minmised the temporary impacts within the CO_2 Connection corridor by reducing the impact within the width of the Order limits.

Drainage Strategy

5.3.5 The **Outline Surface Water Drainage Strategy (EN010166/APP/6.4)** includes provision for a Proposed Surface Water Outfall within the Dee Estuary SAC. This outfall would result in temporary loss of saltmarsh (up to 650 m^2) during its construction and permanent loss of saltmarsh (a maximum of 5 m^2) associated with the footprint of a new headwall. The Applicant has considered alternative options that would reduce the temporary and permanent losses of saltmarsh. The following runoff destinations were considered during the development of the **Outline Surface Water Drainage Strategy (EN010166/APP/6.4)**:

- rainwater reuse;
- infiltration to ground;
- existing open watercourses;

- the existing Connah's Quay Power Station Surface Water Outfall (W2);
- the existing Oakenholt Brook Culvert;
- the existing Old Rockcliffe Brook Culvert;
- combinations of W2 and culverted watercourses; and
- sewers.

5.3.6 At this stage, the Applicant is unable to demonstrate that there is a viable drainage solution that would not result in the permanent loss of saltmarsh habitat within the Dee Estuary / Aber Dyfrdwy Special Area of Conservation SAC. The Applicant is committed to exploring opportunities to split the surface water discharges across two or three of the pipes located within the Main Development Area (the W2 outfall, the Oakenholt Brook Culvert and the Old Rockcliffe Brook Culvert). This would take the form of detailed modelling, however, based on a preliminary modelling exercise undertaken for the Oakenholt Brook Culvert, the capacities of these pipes are limited and additionally discharges would need to be restricted. If this is deemed viable and removes the permanent loss of saltmarsh habitat, it will be the preferred drainage solution. This is detailed within the **Outline Surface Water Drainage Strategy (EN010166/APP/6.5)**.

6. Post Development

6.1 Construction Impacts

6.1.1 The Construction and Operation Area predominantly comprises modified grassland, other neutral grassland, coastal saltmarsh and OMH (see **Appendix B - Figure 3: Indicative Landscape Plan**). The majority of the permanent impacts are attributed to the loss of 12.56 ha of modified grassland. The majority of the works will result in retainment of habitat or temporary loss of habitat (see **Appendix B - Figure 4: Permanent and Temporary Loss of Habitats**), with habitats impacted being reinstated to their original condition post-construction (see **Table 2-1** for durations of temporary losses) or enhanced/ created to facilitate a net benefit and maintained the Order limits GI (see **Appendix B - Figure 3: Indicative Landscape Plan**). **Table 6-1** presents a detailed overview of habitats impacted by the Proposed Development.

6.1.2 Considering **Appendix B - Figure 3: Indicative Landscape Plan** and **Figure 4: Permanent and Temporary Loss of Habitats**, the following habitats have achieved a net loss, no net loss or net benefit as result of the Proposed Development:

- c1c7 - Other Cereal Crops (no net loss);
- f2b - Purple Moor Grass and Rush Pastures (no net loss);
- g1c – Bracken (net loss – 0.05 ha);
- g4 - Modified Grassland (net loss – 14.32 ha);
- g3c - Other neutral grassland (ONG) (net loss –3.82 ha);
- h3d - Bramble Scrub (net loss – 0.43 ha);
- h3h - Mixed Scrub (net loss – 0.95 ha);
- t2a - Coastal Saltmarsh (net benefit – 0.13 ha);
- u1 847 - Introduced shrub (net loss – 0.1 ha);
- u1f 80 - Open Mosaic Habitat on Previously Developed Land (net benefit – 3.84 ha);
- w1f7 - Other Lowland Mixed Deciduous Woodland (no net loss);
- w1g - Other broadleaved woodland (net benefit – 1.19 ha);
- h2b - Non-native and ornamental hedgerow (no net loss);
- h2a5 - Species rich native hedgerow (h2a5) (no net loss);
- h2a6 - Other native hedgerow (net loss – 0.21 km);
- Individual Trees (U1 200) (net benefit – 70 trees); and
- Individual Trees (U1 200) – ancient or veteran (no net loss) .

Table 6-1: Habitats impacted by the Proposed Development

UKHab Habitat Type	S7 Habitat Y/N	Area (Ha) Baseline	Area (Ha) Retained	Area (Ha) Temporarily Lost and Reinstated	Area (Ha) Permanently Lost	Area (Ha) Enhanced	Area (Ha) Created	Total Area (Ha) Post-Development
c1c7 - Other Cereal Crops	N	0.28	0.28	0	0	0	0	0.28
f2b - Purple Moor Grass and Rush Pastures	Y	0.01	0.01	0	0	0	0	0.01
g1c - Bracken	N	0.17	0.12	0	0.05	0	0	0.12
g4 Modified Grassland	N	31.04	5.00	9.63	14.69	1.73*	0.36	16.72**
g3c - Other neutral grassland	Y	5.86	0	0	3.82	2.04	0	2.04***
h3d - Bramble Scrub	N	0.54	0.11	0	0.43	0	0	0.11
h3h - Mixed Scrub	N	2.04	1.09	0	0.93	0	0	1.09
t2a - Coastal Saltmarsh (inclusive of intertidal mudflat)	Y	0.26	0.19	0.06	0	0	0.13	0.38
u1 847 - Introduced shrub	N	0.15	0.05	0	0.10	0	0	0.05
u1c - Artificial Unvegetated, Unsealed Surface	N	0.10	0.10	0	0	0	0.09	0.19

UKHab Habitat Type	S7 Habitat Y/N	Area (Ha) Baseline	Area (Ha) Retained	Area (Ha) Temporarily Lost and Reinstated	Area (Ha) Permanently Lost	Area (Ha) Enhanced	Area (Ha) Created	Total Area (Ha) Post-Development
u1d - Developed Land; Sealed Surface u1c -	N	28.39	26.70	0	1.69	0	0	42.82
u1f 80 - Open Mosaic Habitat on Previously Developed Land	Y	6.78	0.40	6.12	0.26	0	4.10	10.62
w1f7 - Other Lowland Mixed Deciduous Woodland	Y	0.16	0.16	0	0	0	0	0.16
w1g - Other broadleaved woodland	N	5.19	4.31	0.06	0.83	0	2.07	6.38
Area Habitat Total		**80.97**	**38.52**	**15.88**	**22.79**	**3.77**	**6.57**	**80.97**
Non-native and ornamental hedgerow (h2b);	N	0.11	0.11	0	0	0	0	0.11
Species rich native hedgerow (h2a5) (Priority Habitat);	Y	1.06	1.03	0.03	0	0	0	1.06

UKHab Habitat Type	S7 Habitat Y/N	Area (Ha) Baseline	Area (Ha) Retained	Area (Ha) Temporarily Lost and Reinstated	Area (Ha) Permanently Lost	Area (Ha) Enhanced	Area (Ha) Created	Total Area (Ha) Post-Development
Other native hedgerow (h2a6).	N – separate hedgerow regulation assessment carried out to define importance.	0.54	0.5	0.22	0.02	0	0.34	0.86
Individual Trees (U1 200)	N	67	32	35 individual trees	35 individual trees	0	105	137
Individual Trees (U1 200) – Ancient or Veteran Tree	N	3	3	0	0	0	0	3

*1.73 ha of modified grassland to be enhanced to other neutral grassland, see paragraph 6.4.6.

**Total habitat area for modified grassland is reported as 14.99 ha not 16.72 ha. This is because the enhanced 1.73 ha will become other neutral grassland.

***Total habitat area for other neutral grassland is reported as 3.77 ha not 2.04 ha. This is because the enhanced 1.73 ha will become other neutral grassland.

*****Rounding has been undertaken to 2.d.p. Due to rounding, minor discrepancies may occur in some totals.

6.2 Designated Sites

6.2.1 The design of the Proposed Development has evolved to avoid statutorily designated sites as much as possible and where this has not been possible the scope of works within them has been minimised.

6.2.2 The Proposed Development overlaps with, and is directly adjacent to, the Dee Estuary/Aber Dyfrdwy SAC and Dee Estuary/Aber Dyfrdwy SPA, Ramsar and SSSI within the Water Connection Corridor and the Surface Water Outfall Area. These areas are required to facilitate the operation of the Proposed Development, as cooling water will be extracted from the River Dee and surface water will be discharged to the Old Rockcliffe Brook.

6.2.3 Through the ornithology surveys, functionally linked land (FLL) has been identified within the Proposed Development. FLL 'is an area of land occurring outside a designated site which is critical to, and necessary for, the ecological or behavioural functions of a qualifying feature for a SPA, SAC or Ramsar site (Ref 33). These habitats are frequently used by SPA species and supports the functionality and condition of the designated sites features'. The available baseline information suggests the Dee Estuary/Aber Dyfrdwy SAC are sensitive to the loss of FLL. For further detail, please see the **Report to Inform Habitats Regulations Assessment** (**EN010166/APP/6.12**).

6.2.4 As shown on **Appendix B - Figure 3 Indicative Site Layout Plan**, a minimum of 30 m ecological buffer zone would be maintained around the C&IEA and Main Development Area. The 30 m buffer will provide an area of protection to any retained saltmarsh habitat within the Dee Estuary/Aber Dyfrdwy SAC, SPA, Ramsar and SSSI. An area of saltmarsh creation will be located within the 30 m ecological buffer zone. The creation of saltmarsh will occur with the construction period.

6.2.5 Construction works will occur within a small area within the Dee Estuary/Aber Dyfrdwy SAC, SPA, Ramsar and SSSI. Workers will be required, on foot, to cross the designated saltmarsh and intertidal mudflat, to access materials supplied by boat on the Dee Estuary. This method is currently in place for inspections on the designated site. No permanent or temporary loss is likely to occur because of the use of these methods. The **Framework CEMP** (**EN010166/APP/6.5**) also requires a Saltmarsh Method Statement to be developed to addresses soil stockpiling and the suitability of using turves, and setting out the proposed approach to monitoring saltmarsh recovery. The Saltmarsh Method Statement would be submitted with the final CEMP for the relevant stage of the Proposed Development.

6.2.6 Temporary and permanent habitat loss will occur within the Dee Estuary/Aber Dyfrdwy SAC, SPA, Ramsar and SSSI where a new surface water outfall would be constructed, adjacent to the pre-existing surface water outfall. Finalised construction methods are not available, however, works could be undertaken via trenchless construction methods or with open excavation. Please see **Chapter 5: Construction Program and Management** (**EN010166/APP/6.2.5**) for further details. Approximately 0.06 ha of temporary habitat loss will occur during construction. This will be reinstated after a six-month construction period. Additional compensation will be required for the time lag between temporary loss and reinstatement, see Table 5 for further detail. As with works in the Water Connection Corridor, the **Framework CEMP**

(**EN010166/APP/6.5**) requires a detailed construction method statement to be prepared and submitted to FCC for approval in consultation with NRW in advance of these works commencing.

6.2.7 Permanent habitat loss would occur within the Dee Estuary/Aber Dyfrdwy SAC, SPA, Ramsar and SSSI where a new surface water outfall would be constructed, adjacent to the pre-existing surface water outfall, see **Chapter 5: Construction Program and Management** (**EN010166/APP/6.2.5**) for further details. As a worst-case assessment, it is assumed there would be a maximum of 5 m^2 of permanent habitat loss during construction if open excavation is to be used. Therefore, compensation is required for this area. See paragraph 1.1.1 for further details.

6.3 Construction Mitigation

6.3.1 The **Framework CEMP** (**EN010166/APP/6.5**) provides details of the measures required to manage the environmental effects of the Proposed Development and demonstrate compliance with environmental legislation. Final CEMP(s) will be prepared, approved and implemented for individual phases of the Proposed Development, in accordance with Requirement 4 in the **Draft DCO** (**EN010166/APP/3.1**).

6.3.2 The **Framework CEMP** (**EN010166/APP/6.5**) outlines the measures required to mitigate[7] construction related effects on IEFs, including those associated with construction dust deposition, air pollution, pollution incidents, water quality, light, noise and vibration. For further detail on an assessment of construction impacts and significance of effects on IEFs during construction and construction mitigation measures, please refer to Section 11.6 of **Chapter 11: Terrestrial and Aquatic Ecology** (**EN010166/AP/6.2.11**) of the **ES**.

6.4 Habitat Creation and Enhancement within the Order Limits

6.4.1 Indicative locations of habitat compensation, in the form of habitat creation and enhancement, are shown on **Appendix B – Figure 3: Indicative Landscape Plan**. Areas of habitat compensation are present throughout the entire Order limits, targeted in areas to sustain GI or wildlife corridors and maintain habitat connectivity. All habitats subject to creation and/or enhancement are detailed in the **Outline LEMP** (**EN010166/APP/6.9**).

6.4.2 Habitats presented in **Table 6-2** will either be temporarily lost or retained during the construction phase and created or enhanced after the nine-year construction period (on-site), as part of the efforts to achieve a net benefit and increase GI within the Order limits. For details on off-site habitat creation and enhancement, please see paragraph 7.4.2 below.

[7] For the purpose of this assessment mitigation is defined as habitats being re-instated following temporary impacts with compensation being defined as habitat being created in a new location within the Order limits or at an off-site location.

Table 6-2: Habitats created or enhanced as part of NBB and GI within Order limits

UKHab	Created/Enhanced	Area(ha) created/enhanced post-construction	Mitigation or Compensation
Coastal saltmarsh (t2a)	Created (re-instated)	0.06ha	Mitigation
Coastal saltmarsh (t2a)	Created	0.13ha	Compensation
Open mosaic habitats on previously developed land (u1f 80)	Created (re-instated)	6.12 ha	Mitigation
Open mosaic habitats on previously developed land (u1f 80)	Created	4.1ha	Compensation
Modified Grassland (g4)	Created	0.36ha – cropland to moderate condition modified grassland .	Compensation
Other neutral grassland (g3c)	Enhanced / Created through enhancement	1.73ha – poor and moderate modified grassland enhanced to moderate condition 2.04 ha – Moderate condition ONG enhanced to good condition For further details see paragraph 6.4.18.	Compensation

UKHab	Created/Enhanced	Area(ha) created/enhanced post-construction	Mitigation or Compensation
Other broadleaved woodland (w1g)	Created	2.07ha – other broadleaved woodland creation in a moderate condition.	Compensation
Species rich hedgerow	Created	A total of 0.34 km of hedgerow is to be planted.	Compensation

6.4.3 A total of 0.13 ha of Coastal Saltmarsh is to be created within the Order limits. Creation of Coastal Saltmarsh would require the loss of areas of Bracken and Other neutral grassland. The exact areas of habitat loss are to be subject to detailed design of the habitat creation proposals but will cover an area of 0.13ha.

6.4.4 A total of 4.1 ha of OMH is to be created within the Order limits, this 4.1 ha is to be newly created OMH located adjacent to areas of existing OMH. A total of 6.12 ha of OMH is to be temporarily impacted and reinstated. This will result in a post development total area of 10.62 ha. Created OMH would require the loss of a maximum of 4.1 ha of other neutral grassland, some areas of grassland may be retained and form part of the mosaic of habitats that will make up the OMH.

6.4.5 A total of 0.36 ha of modified grassland in moderate condition is to be created. This will require the loss of cropland habitat.

6.4.6 A total of 1.73 ha of modified grassland in poor and moderate condition is to be enhanced to moderate condition other neutral grassland, with a further 2.04 ha of moderate condition other neutral grassland being enhanced to good condition. Whilst there will be a loss of 1.73 ha of modified grassland, this will not result in a loss of grassland habitat as this area is being enhanced to a grassland habitat type of greater species richness.

6.4.7 A total of 2.07 ha of other broadleaved woodland is to be created in moderate condition. This will require the loss of 2.07 ha of grassland habitat, which includes a small area of bramble scrub.

6.4.8 An outline of the habitat creation and enhancement proposals are presented below.

Habitat Creation and Enhancement Criteria

6.4.9 Habitats presented in **Table 6-2** are required to meet a set of criteria to ensure that their habitat type is achieved post-development, this is described below.

6.4.10 For the creation of habitat types which are Section 7 Priority Habitats and United Kingdom Biodiversity Action Plan (UKBAP) classification (Coastal Saltmarsh and OMH) it should be noted that creation of these habitats presents a high degree of difficulty due to the significant time taken to restore, recreate or replace once lost, given their age, uniqueness, species diversity

and rarity. Under PPW12 OMH and Coastal Saltmarsh fall within this definition[8] (Ref 1).

Coastal Saltmarsh

6.4.11 To compensate for the small area of loss and temporary impact to Coastal Saltmarsh within the Dee Estuary / Aber Dyfrdwy SAC / SPA / Ramsar site a small area of Saltmarsh creation will occur within the 30 m ecological safeguard zone within the C&IEA. This would include bringing the current defences inland and allow the saltmarsh to naturally retreat to such an extent that any losses due to the Proposed Surface Water Outfall (the vast majority of which would be temporary) would be more than offset by the reduction in coastal squeeze allowed by the realigned defences south of the existing Power Station. A Conservation Areas Management Plan (Ref 34) previously developed for a historic application indicates that between 2010 and the date of the Management Plan (2015) some previously exposed mud around the foreshore had been colonised by common saltmarsh grass (*Puccinella maritima*) indicating natural saltmarsh colonisation and extension can occur in this area if suitable conditions are created. For further details please refer to Section 10 of **Report to Inform Habitats Regulations Assessment** (**EN010166/APP/6.12**).

6.4.12 To achieve good quality Saltmarsh (moderate condition within Department for Environment, Food and Rural Affairs (DEFRA) Statutory Biodiversity Condition Assessment Criteria) NRW advice on assessment and monitoring of Coastal Saltmarsh (Ref 34) can be used in combination with the Statutory Biodiversity Condition Criteria. Refer to **Table 2** of the **Outline LEMP** (**EN010166/APP/6.9**) for the Statutory Biodiversity Condition Assessment criteria of coastal saltmarsh.

6.4.13 For further detail on the management and monitoring of Coastal Saltmarsh, please see the **Outline LEMP** (**EN010166/APP/6.9**).

Open Mosaic Habitat

6.4.14 Habitats are to be created using natural processes and are to be monitored during the establishment phase with remedial management actions undertaken to ensure that target habitats with associated conditions are created and met.

6.4.15 Once habitats are established active management would be undertaken to ensure that habitat remain in favourable condition (see Section 8). Adaptive management will be more favourable and should be adjusted based on the changing and adaptive conditions, species present and mosaic of habitat types that develop within the Site.

6.4.16 To achieve good quality OMH (moderate condition within DEFRA Statutory Biodiversity Condition Assessment Criteria) the following criteria must be met:

[8] Coastal Saltmarsh as described in PPW 12 includes a *'large number of natural resources to underpin them which would be technically very difficult (or take a very significant time) to restore, recreate or replace once destroyed, considering their age, uniqueness, species diversity or rarity. Examples include ancient woodland and veteran trees, ancient hedgerows, wet woodlands, sand dunes, peatland, species rich grassland, long undisturbed soils, blanket bogs, salt marsh and lowland fen'.*

- vegetation structure is varied, providing opportunities for vertebrates and invertebrates to live, eat and breed. A single structural habitat component or vegetation types does not account for more than 80% of the total habitat area;
- the habitat contains different plant species that are beneficial for wildlife;
- invasive non-native plants (listed in Schedule 9 of the Wildlife and Countryside Act 1981 Ref 36) and others which are to the detriment of native wildlife (using professional judgement) are absent of the total vegetated area; and
- the habitat must show spatial variation and forms a mosaic of bare substrate plus four early successional communities (annuals, mosses/liverworts, lichens, ruderals, inundation species, open grassland, flower-rich grassland, heathland, pools).

Other Neutral Grassland

6.4.17 A total of 2.04 ha of ONG in poor and moderate condition is to be enhanced in areas where ONG has been retained or reinstated (see **Appendix B - Figure 2**) and a total of 1.73 ha of modified grassland in poor and moderate condition is to be enhanced to moderate condition other neutral grassland.

6.4.18 To achieve the intended conditions for ONG/ good semi-improved grassland, DEFRA Statutory Biodiversity Condition Assessment Criteria (Ref 37) can be used in combination with NRW's State of Natural Resources Report (Ref 38) to define the criteria needed to create good quality ONG, and is described as follows:

- The parcel represents a good example of its habitat type[9], with a consistently high proportion of characteristic indicator species present relevant to the specific habitat type;
- Sward height is varied (at least 20% of the sward is less than 7 cm and at least 20% is more than 7 cm) creating microclimates which provide opportunities for insects, birds and small mammals to live and breed;
- Cover of bare ground is between 1% and 5%, including localised areas;
- Cover of bracken *Pteridium aquilinum* is less than 20% and cover of scrub (including bramble *Rubus fruticosus agg*.) is less than 5%;
- Combined cover of species indicative of suboptimal condition and physical damage (such as excessive poaching, damage from machinery use or storage, damaging levels of access, or any other damaging management activities) accounts for less than 5% of total area; and
- There are 10 or more vascular plant species per m^2 present, including forbs that are characteristic of the habitat type.

6.4.19 For further detail on the management and monitoring of Other Neutral Grassland please see the **Outline LEMP** (**EN010166/APP/6.9**).

[9] For definition of Other Neutral Grassland refer to UKHab guidance UKHab-v2.01-July-2023-Final-2 (1).pdf

Other Broadleaved Woodland

6.4.20 A total of 2.07 ha of Other Broadleaved Woodland in a moderate condition is to be created (see **Figure 3)**. The creation of woodland will help maintain and extend the green infrastructure corridors currently present within the Main Development Area.

6.4.21 To achieve moderate condition, Other Broadleaved Woodland, a total of 26 to 32 points over the 32 categories of good to poor criteria, within the Statutory Biodiversity Condition Assessment Sheet need to be met. For further details on the criteria, refer to **Table 2** in the **Outline LEMP** (**EN010166/APP/6.9**).

6.4.22 For further detail on the management and monitoring of Other Broadleaved Woodland please see the **Outline LEMP** (**EN010166/APP/6.9**).

6.5 Application and Compliance of Stepwise

6.5.1 This section outlines the 'Stepwise Approach' that has been followed to avoid, minimise, mitigate and compensate impacts to habitats resulting from the Proposed Development. **Table 6-3** identifies how the stepwise approach has been applied for ecological receptors permanently and temporarily impacted by the Proposed Development. In summary:

- Biodiversity and wider ecosystem benefits were considered early in the design process for the Proposed Development. This led to design and programme changes, including the retention of habitats and avoidance of disturbance where possible. This accords with the 'Avoidance' principle of the Stepwise Approach (as demonstrated in Section 6);
- Where it was not possible to avoid specific biodiversity impacts, measures to minimise the impacts were recommended. This led to the recommendation of several strategies which minimise the Proposed Development's impact on biodiversity. These recommendations are secured through the **Framework CEMP** (**EN010166/APP/6.5**) and the **Outline LEMP** (**EN010166/APP/6.9**). This accords with the 'Minimise' principle of the Stepwise Approach; and
- Where predicted impacts may still occur following avoidance measures and measures to minimise impacts, mitigation measures would be implemented for habitats and species. Species mitigation and habitat enhancement measures have been designed to reduce the impacts of the Proposed Development, supporting the 'Mitigate' principle of the Stepwise Approach.

Table 6-3: Stepwise Approach taken to deliver NBB for Connah's Quay Proposed Development

Habitat Type	Habitat Type	Permanently/ Temporarily / Retained	Avoid	Minimise	Mitigate	Compensate
Designated Sites	Dee Estuary/Aber Dyfrdwy SAC, SPA, Ramsar and SSSI saltmarsh area.	Temporary Loss/ Retained	The design is such that the construction and operation footprint required has avoided designated sites wherever possible. Through design development, outlined in **Chapter 6: Project Alternatives** (**EN010166/APP/6.2.6**) the Applicant has minimised works in the Water Connection Corridor. Works are now limited to maintenance and upgrades of the existing Connah's Quay Power Station's cooling water infrastructure and would not interfere with the riverbed of	The design is such that the construction and operational footprint encroaching on designated habitat has been minimised as far as possible in defining the Order limits. A 30 m ecological buffer zone will be maintained within the C&IEA and Main Development Areas, where construction laydown areas are located, providing an area of protection to coastal saltmarsh. Temporary works within the vicinity of the existing surface water outfall would be undertaken via trenchless construction methods (where	All residual impacts would be mitigated through the **Framework CEMP** (**EN010166/APP/6.5**) to prevent any significant effects from any sensitive features within the designated site. For further details see **Framework CEMP** (**EN010166/APP/6.5**).	An area of 0.13 ha of coastal saltmarsh would be created within the ecological safeguard zone, post-construction. The creation of saltmarsh within this area would require setting back the existing tidal defences south of the existing power station to sea level, to allow saltmarsh habitat within the SSSI/SAC to extend inland naturally. This would create approximately 0.13 ha of permanent new saltmarsh thus offsetting the small temporary (650 m^2) and permanent loss (maximum of 5 m^2 ha).

Habitat Type	Habitat Type	Permanently/ Temporarily / Retained	Avoid	Minimise	Mitigate	Compensate
			require works in adjacent habitats. The drainage design outline in **Appendix 13-D: Outline Surface Water Drainage Strategy** (**EN010166/APP/6.4**) of the **ES** has sought to avoid impacts on designated habitat through design development. Additional outfall locations were considered but discounted.	possible), with a worst-case temporary impact of 0.06 ha of coastal saltmarsh. For further details **see Chapter 5: Construction Programme and Management** (**EN010166/APP/6.2.5**). The drainage design outline in **Appendix 13-D: Outline Surface Water Drainage Strategy** (**EN010166/APP/6.4**) of the **ES** has sought to minimise impacts on designated habitat through design development. This Includes extended the existing headwall rather than creating a new standalone headwall which would have a larger footprint.		Due to the time lag between temporary loss of Saltmarsh and its reinstatement, it is recommended that the habitat be fully compensated for off-site if the habitat cannot reach the desired condition. With this compensation in place a net benefit has been provided to the Dee Estuary/Aber Dyfrdwy SAC, SPA, Ramsar and SSSI saltmarsh area. The management of newly created saltmarsh is detailed in the **Outline Saltmarsh Implementation and Monitoring Plan (EN010166/APP/6.16)** and **Outline LEMP** (**EN010166/APP/6.9**).

Habitat Type	Habitat Type	Permanently/ Temporarily / Retained	Avoid	Minimise	Mitigate	Compensate
						For further detail on management and monitoring see Section 9.
Irreplaceable Habitat (Ancient and Veteran Trees)	Veteran Trees	Retained	The design is such that the construction and operation footprint required has avoided ancient and veteran trees.	N/A	No new hard surfacing will be required within the RPA of veteran or ancient trees however existing access routes will be utilised by the Proposed Development within the RPA of three veteran trees. A total of three RPA incursions will be required for veteran trees to facilitate the use of existing access roads for construction traffic. Mitigation measures are likely to include the use of either a three-dimensional cellular raft system or	N/A

Habitat Type	Habitat Type	Permanently/ Temporarily / Retained	Avoid	Minimise	Mitigate	Compensate
					ground protection, suitable for the heaviest anticipated load, to prevent negative impacts to the structure of the soil within the RPA.	
S7 Priority Habitat	Intertidal mudflats (t2d)	Retained	The design is such that the construction and operational footprint required has been devised to avoid land take of intertidal mudflats.	N/A	Standard environmental protection measures formalised through the **Framework CEMP** (**EN010166/APP/6.5**) will be applied to all S7 habitats temporarily and permanently effected by the Proposed Development. For further details refer to **Framework CEMP** (**EN010166/APP/6.5**). For Open mosaic habitats on previously	As above – see designated sites
	Lowland mixed deciduous woodland (w1f7)	Retained	The design is such that the construction and operational footprint required has been devised to avoid land take of lowland mixed deciduous woodland where feasible.	All works within proximity to lowland mixed deciduous woodland would be set back in line with Root Protection Zones (RPZ). For further details, refer to **Appendix 15-G: Arboricultural Impact Assessment** (**EN010166/APP/6.4**)		N/A

Habitat Type	Habitat Type	Permanently/ Temporarily / Retained	Avoid	Minimise	Mitigate	Compensate
	Species rich native hedgerow (h2a5)	Permanent, and Temporary loss/ Retained.	The design is such that the construction and operational footprint required has been devised to avoid land take of species-rich native hedgerows and hedgerows classified as important under the Hedgerow Regulations (1997) act where feasible.	The construction of the Proposed Development would result in the permanent loss of approximately 22 m of other native hedgerow (valued as important) within the Main Development Area and a temporary loss of approximately 32 m of species-rich hedgerow within the Proposed CO_2 Connection Corridor The 32m loss of species-rich hedgerow within Proposed CO_2 Connection Corridor would be replanted after a 9-month construction period.	developed land (u1f 80) a total 6.12 ha of OMH is to be temporarily impacted and reinstated on completion of construction as detailed in the **Outline LEMP (EN010166/APP/6.9)**. For individual trees, mitigation measures will be detailed in Arboriculture method statement **Appendix 15-G: Arboricultural Impact Assessment** (**EN010166/APP/6.4**) **and adopted in the Outline LEMP** (**EN010166/APP/6.9**) which is secured via the **Framework CEMP** (**EN010166/APP/6.5**)	Compensation is required for a small section of hedgerow, hedgerow loss. This section of hedgerow would be replaced at a minimum compensation ratio of 3:1 (to be delivered on-site around the north and west of the operational fence line) and would comprise planting of native species of local provenance, in - keeping with woodland within the wider landscape. A total of 0.34 km of hedgerow is to be planted. Management of newly planted hedgerow is prescribed by the detailed **Outline LEMP** (**EN010166/APP/6.9**).

Habitat Type	Habitat Type	Permanently/ Temporarily / Retained	Avoid	Minimise	Mitigate	Compensate
						For further details on management and monitoring see Section 8.
	Open mosaic habitats on previously developed land (u1f 80)	Long-term temporary loss	Due to the nature of the Proposed Development, and operational and construction activities required to facilitate the development, the land take of OMH was unavoidable. The loss of habitat would be permanent, for a period of up to 9 years.	N/A		Post-construction works (up to 9 years), an area representational of the loss of OMH would be created and reinstated back to its original condition. An area of 4.10 ha of OMH, directly adjacent to the area of OMH subject to permanent removal, will also be created to achieve a net benefit. A total of 10.62 ha of OMH will be permanently established post-construction. The creation of OMH is subject to an adaptive management and monitoring regime

Habitat Type	Habitat Type	Permanently/ Temporarily / Retained	Avoid	Minimise	Mitigate	Compensate
						to meet UK BAP status. The criteria to create and maintain OMH to UK BAP status is detailed in Section 6.4. For further details on management and monitoring see **Section 9** and the **Outline LEMP** (**EN010166/APP/6.9**).
	Coastal saltmarsh (t2a)	Retained and Temporary Loss	As above – see designated sites.	As above – see designated sites.		As above – see designated sites.
	Other neutral grassland (g3c)	Permanent and Temporary Loss/ Retained.	The design is such that the construction and operational footprint required has been devised to avoid land take of other neutral grassland where feasible.	The design is such that the construction and operational footprint required has been minimised as far as possible to minimise potential impacts to other neutral grassland.		The Proposed Development will result in the permanent loss of approximately 3.82 ha of other neutral grassland. 2.06 ha of ONG would be enhanced where existing areas of ONG habitat are retained as

Habitat Type	Habitat Type	Permanently/ Temporarily / Retained	Avoid	Minimise	Mitigate	Compensate
						part of the Proposed Development. 1.73 ha of modified grassland is to be enhanced to moderate condition ONG. Whilst the Proposed Development will result in the loss of 2.1 ha of ONG, it is considered that the enhancement of retained grassland habitats better supports wildlife than a larger area of relatively species poor grassland. Within this grassland habitat scrapes are to be created to provide further habitat for a range of protected and notable species. Most notably Curlew (*Numenius Arquata),*

Habitat Type	Habitat Type	Permanently/ Temporarily / Retained	Avoid	Minimise	Mitigate	Compensate
						amphibians, reptiles and invertebrate species. Where grassland habitats would be enhanced to support a net benefit on-site, all criteria to reach the desirable condition will be described in the **Outline LEMP** (**EN010166/APP/6.9**. The criteria to achieve this grassland enhancement is detailed in Section 6.4. Compensation is required off-site (see Section 8) for modified and other neutral grassland. Management prescriptions of modified grassland and other neutral grassland are detailed

Habitat Type	Habitat Type	Permanently/ Temporarily / Retained	Avoid	Minimise	Mitigate	Compensate
						in the **Outline LEMP** (**EN010166/APP/6.9**)
Non-S7 Priority Habitat	All Habitats	Permanent and Temporary Loss/ Retained.	The design is such that the construction and operational footprint required has been devised to avoid the land take of habitats wherever possible. High-Priority habitats, species supporting habitat, and GI features have been prioritised for avoidance.	The design is such that the construction and operational footprint required has been minimised as far as possible to minimise potential impacts to all non-S7 Priority Habitats that support species, wildlife corridors and green infrastructure.		The Proposed Development will result in the permanent loss of approximately 35 trees, and 0.83 ha of woodland which are important habitats to sustain GI corridors within the Order limits. 105 trees will be planted on-site within the Main Development Area post construction. 2.07 ha of other broadleaved woodland will be created on-site within the Main Development Area post construction. Compensation is required off site (see

Habitat Type	Habitat Type	Permanently/ Temporarily / Retained	Avoid	Minimise	Mitigate	Compensate
						Section 7) for the loss of scrub and small loss of trees and woodland that cannot be created on-site. Scrub will be compensated for within the Off-Site Delivery Area at a ratio of 1:1 (see **Off-Site NBB and GI Strategy** (**EN010166/APP/6.14**). Trees and Woodland will be compensated for within the Off-Site Delivery Area at a minimum ratio of 3:1. 3 trees and minimum of 0.42 ha of woodland creation will be required to satisfy PPW12 compensation ratios (see the **Off-Site NBB and GI Strategy** (**EN010166/APP/6.14**).

Habitat Type	Habitat Type	Permanently/ Temporarily / Retained	Avoid	Minimise	Mitigate	Compensate
						Planting would comprise native species of local provenance, in - keeping with woodland within the wider landscape.

6.6 Application and Compliance of DECCA

6.6.1 The construction of the Proposed Development will result in a permanent and temporary loss of several habitat types. Habitat compensation would ensure that habitats are replaced equal or above for their compensation. For compensation replacement ratios per habitat type see **Table 6-3.**

6.6.2 Where Section 7 Priority Habitats or habitats which support GI within the Order limits, and are to be temporarily lost, these habitats would be created after the relevant construction period outlined in **Table 2-1**. For Section 7 habitats, including those with UKBAP status, to retain Priority Habitat status, their creation must follow a set of criteria. For criteria on the creation of Coastal Saltmarsh and OMH see Section 6.4.

6.6.3 Where habitats cannot be replaced and fully mitigated for their loss, other habitats within the Order limits will be enhanced to increase biodiversity value.

6.6.4 Where habitats cannot be replaced, fully mitigated or compensated for within the Order limits, off-site compensation is required. See Section 7 for further details.

6.6.5 Where impacts to biodiversity were predicted, following the application of avoidance measures and measures to minimise impacts, mitigation was implemented, and compensation provided. The measures aiming to increase ecosystem resilience could be categorised per mitigation/compensation type and are summarised below in **Table 6-4**. Each measure's contribution to ecosystem resilience is also highlighted using the DECCA Framework. **Table 6-4**includes habitats that are key to the functioning of the ecosystem contained within the Order limits and its benefits to the wider ecosystem, the inclusion of these habitats only is appropriate and proportional and provides enough detail to assess impacts to the ecosystem. Further analysis of the impact of the proposals on ecosystem resilience is presented below **Table 6-4**

6.6.6 Habitat creation and enhancement would deliver nature-based solutions and achieve a Net Benefit for Biodiversity. These proposals enhance ecosystem resilience and support a wide range of ecosystem services, including regulating, supporting, cultural and provisioning services. **Table 6-4**, under DECCA attribute 'A', adaptability to change, shows all planned habitat mitigation and compensation (both enhancement and creation) for each habitat type and explains how they contribute to ecosystem services and resilience.

Table 6-4: Mitigation and Compensation Measures and their Contribution to Ecosystem Resilience

Habitat Impact	Mitigation or Compensation	Diversity	Extent	Condition	Connectivity	Adaptability to Change
Coastal Saltmarsh (t2a) – designated.	Ecological Safeguard Zone (mitigation) Saltmarsh creation (compensation)	An ecological buffer will protect the existing habitats from construction disturbance and contain/support the pre-existing species and plant genetic diversity. Creating saltmarsh habitat adjacent to the Dee Estuary/Aber Dyfrdwy SAC/ SSSI/Ramsar would increase the opportunity for diverse communities to establish as well as providing important natural resources to support the diversity and rarity of breeding birds,	The retention of 0.19 ha and creation of 0.13 ha of Coastal Saltmarsh would maintain and extend the habitat within the Order Limit and prevent the net loss of designated habitat. If the re-establishment or creation of Coastal Saltmarsh fails, it is	Coastal Saltmarsh baseline condition within the ecological safeguard zones would be maintained. To ensure the baseline condition would be maintained a pre-construction assessment is required to understand its current pressures (Ref 42). Condition will be maintained through following the Standard environmental protection measures formalised through the **Framework CEMP (EN010166/APP/6.5**	Maintaining and creating saltmarsh within the Dee Estuary/Aber Dyfrdwy SAC/ SSSI/ Ramsar would enhance the ecological connectivity by linking different habitat types. This connectivity allows species to move and disperse, which is vital for genetic diversity and ecosystem resilience	Saltmarshes are dynamic systems that can adapt to changing environmental conditions, such as sea-level rise and increased storm frequency. Their ability to trap and stabilise sediments helps in shoreline protection and adaptation to climate change impacts. The creation of coastal saltmarsh provides opportunities to enhance flood regulation, increase carbon sequestration and supports adaptation to sea level rise. However, given the relatively small size of this habitat creation these benefits may be limited.

Habitat Impact	Mitigation or Compensation	Diversity	Extent	Condition	Connectivity	Adaptability to Change
		invertebrates and fish. This aligns with the goal of expanding protected areas to 30% of land cover by 2030 (Ref 42.	recommended that the extent of Coastal Saltmarsh be sought off-site. See Section 6.4 for further details.	) and recommendations discussed within the **Report to Inform Habitats Regulations Assessment** (**EN010166/APP/6.12**). The condition of the Saltmarsh created would be required to meet the UK BAP definition. See Section 6.4 for further details on habitat creation criteria.		
Species rich native hedgerow (h2a5)	Replanting of hedgerow over cable easement (mitigation) Hedgerow creation	A mix of whips and standard sized shrubs of native species of local provenance in-keeping with the overall species composition of hedgerows affected	Additional hedgerows would be planted on-site, to increase the extent of green infrastructur	Hedgerows planted would naturally mature to form part of a fully functioning hedgerow.	Replanting where gaps are created by the Proposed Development would maintain connectivity	The creation of new hedgerow habitat will increase connectivity through ecological corridors and support pollinator species and bat species. This mitigation and compensation measure is likely to support adaptability to change through the

Habitat Impact	Mitigation or Compensation	Diversity	Extent	Condition	Connectivity	Adaptability to Change
	(compensation)	would be used in replanting of hedgerows to maintain the species diversity of the existing species-rich hedgerows. The important hedgerow criteria should be followed in replanting and creation of hedgerow (Ref 43). All reasonable steps to establish and maintain a green cover on land within 2 metres of the centre of a hedgerow covered by the hedgerow management buffer strip rules will be implemented as prescribed in the	e (**See Appendix A**).		of the hedgerow network. The creation of new hedgerow would expand commuting routes for protected and notable species, namely bat and reptile species.	provision of ecosystem service resilience and expansion of green infrastructure networks.

Habitat Impact	Mitigation or Compensation	Diversity	Extent	Condition	Connectivity	Adaptability to Change
		Outline LEMP (EN010166/APP/6.9).				
Open mosaic habitats on previously developed land (u1f 80)	Re-establishment of OMH (Mitigation) OMH creation (compensation)	The re-establishment and creation of OMH may be achievable due to the nature of the Order limits. OMH supports a wide range of species. The mix of hard standing and vegetated land creates a variety of microhabitats, promoting a diverse ecosystem. Active management of this habitat would ensure that a diverse range of habitat types are established.	The re-establishment of 6.12 ha and creation of 0.26 ha of OMH within the Order limits will preserve and increase the area of OMH on-site. If the re-establishment or creation of OMH fails, it is recommended that the extent of OMH be	The condition of the OMH created will be required to meet the UK BAP definition. See Section 6.4 for further details on habitat creation criteria.	OMH enhances ecological connectivity by linking different habitats, such as grassland and shrub. This connectivity allows species to move and disperse, which is vital for genetic diversity and ecosystem resilience.	The reinstatement and creation of OMH will provide a habitat of high habitat, botanical and species diversity and increase the ecosystems resilience to disturbance. OMH are dynamic systems that can adapt to changing environmental conditions. Their ability to support a variety of species and habitats helps in adapting to climate change impacts and maintaining ecological functions.

Habitat Impact	Mitigation or Compensation	Diversity	Extent	Condition	Connectivity	Adaptability to Change
			sought off-site. See Section 6.4 for further details.			
Other neutral grassland (g3c)	Replanting of grassland (enhanced from modified grassland to other neutral grassland) (mitigation) Other neutral grassland and modified grassland creation (compensation)	By replanting grassland of a higher distinctiveness which would comprise a more diverse vegetative community, the genetic diversity of the grassland will be improved.	The extent of grassland would not be maintained on-site. Off-site compensation will be required. To compensate for the loss of modified and other neutral grassland, where possible areas identified for replanting within the	The condition of the grassland will be improved by re-seeding with a more diverse seed mix.	Preserving and replanting grasslands can enhance habitat connectivity, allowing species to move and disperse more freely disperse.	The enhancement and creation of ONG habitat will improve habitat quality, support a range of protected and native species and contribute to enhanced ecosystem resilience and functioning. Through the improvement of grassland type and enhancing the condition this mitigation and compensation measure is likely to support adaptability to change.

Habitat Impact	Mitigation or Compensation	Diversity	Extent	Condition	Connectivity	Adaptability to Change
			Order limits would be enhanced as other neutral grassland in a good condition or created as other neutral grassland in a moderate condition. To compensate for the loss of 0.83 ha of other neutral grassland, a 2:1 compensation planting ratio would be implemented. A minimum of 1.66 ha of other neutral			

Habitat Impact	Mitigation or Compensation	Diversity	Extent	Condition	Connectivity	Adaptability to Change
			grassland is required to be created or enhanced off-site.			
Individual Trees	Tree buffers (mitigation)	Ancient and Veteran trees will be retained, preserving their ability to support a wide range of species and maintain the diversity of habitats within the Order limits where possible.	By preserving Ancient and Veteran trees, the extent of irreplaceable habitat within the Order limits is maintained. 105 trees are to be planted within the Main Development Area, increasing	By maintaining a 15 m RPA surrounding Ancient and Veteran trees it helps maintain their structural integrity, and status.	A 15 m RPAs for Ancient and Veteran trees within the Proposed Development's construction phase helps support GI features and corridors.	Retention of trees will ensure key ecosystem service provisions such as carbon sequestration and soil erosion are maintained and contribute to enhanced ecosystem resilience and functioning.

Habitat Impact	Mitigation or Compensation	Diversity	Extent	Condition	Connectivity	Adaptability to Change
			the extent of trees on-site.			
Woodland Habitats (Lowland mixed deciduous woodland & other broadleaved woodland)	Retention and protection of 0.16 ha of lowland mixed deciduous woodland and 4.31 ha of other broadleaved woodland. Creation of 2.07 ha of other broadleaved woodland.	Retained woodland habitat will be brought into active management which will increase the diversity of woody vegetation and ground flora. The creation of additional woodland will increase the species diversity for both woody vegetation and ground flora. Both will also increase vertical structure of the woodland and the age of tree species. This will result in an increase in the	Created woodland habitat will result in an increase of woodland cover of approximately 1.19 ha, when the loss of 0.83 ha of woodland habitat is accounted for. This increase in woodland extent will provide additional habitat for a range of protected and notable species in	Retained woodland will be brought into active management to maintain its condition. Created habitat will be managed with the aims to achieve moderate condition.	The increased extent of the woodland will provide additional connectivity across the wider landscape for a range of protected and notable species.	Active management of retained woodland will allow for regeneration within the woodland resulting in a habitat more adaptable to the pressures of climate change. Woodland creation will increase carbon sequestration, improve air quality, and provide habitat for a range of protected and notable species, while enhancing structural diversity and ecosystem resilience.

Habitat Impact	Mitigation or Compensation	Diversity	Extent	Condition	Connectivity	Adaptability to Change
		diversity of habitat niches available for species to colonise.	addition to this it will also provide a range of ecosystem services.			

6.7 Application and Compliance of Building with Nature Standards Framework

6.7.1 Opportunities for incorporating green infrastructure has been undertaken paying due regard to the BwNSF (Ref 28). The BwNSF sets out best practice standards to define a benchmark of good green infrastructure and how to deliver it. **Table 6-5** detailed evidence of how the Proposed Development has worked towards upholding and achieving these standards where applicable.

Table 6-5: Summary of Proposed Green Infrastructure Mitigation and Enhancement and its Link to BwNSF

Standard	Justification for Meeting the Standard
1 Optimises Multifunctionality and Connectivity	Ecological connectivity has been preserved where possible, through the replanting and creation of hedgerows, trees and woodland. Replacement planting of trees and hedgerows would help to main green infrastructure connectivity with wider habitats for species such as bats. An ecological safeguard zone of 30 m would be maintained and set back from the main development and northern boundary of the C&IEA. This minimum 30 m ecological safeguard zones, with acoustic fencing would be used to provide protection for sensitive habitats and IEFs, including within the Dee Estuary. Overall, this would help maintain connectivity to several habitat types and support priority species within them.
2 Positively responds to the Climate Emergency	The design will satisfy current construction standards to ensure the design is resilient to changes in climate. Where appropriate, the Construction Contractor will use low carbon approaches to construction. The **Framework CEMP** (**EN010166/APP/6.5**) details the measures required to manage the environmental effects of the construction works and demonstrate compliance with environmental legislation will be implemented.
3 Maximises Environmental Net Gains	Environmental net gain (ENG) would be delivered through sustaining GI within the Order limits. Through the maintenance of GI, ENG will be delivered through improvement to air and water quality, as well as providing refuge for wildlife. To support the net increase of ENG, off-site habitat compensation would be provided and ensure that habitat creations reflect the requirements of ENG and serve local priorities.

Standard	Justification for Meeting the Standard
	People connections will not be supported as part of the Proposed Development's efforts to maximise ENG due to its operational nature.
4 Champions a Context Driven Approach 5 Creates Distinctive Places	Net Benefit would be acquired on and/or off-site. The like-for-like replacement and avoidance of GI (hedgerow, woodland and trees) and creation of grassland/ OMH would ensure that Flintshire Council Strategic Policy STR13 and 14 of the Joint Local Development Plan will be met.
6 Secures Effective Place-keeping	All habitat creation and enhancement proposed as part of this NBB assessment would require regular maintenance and monitoring. Management of all habitats created or enhanced would be detailed within the final LEMP(s) and monitored for at least 5 years. Areas of saltmarsh and OMH creation will be subject to a 10-year monitoring and management period. This demonstrates a commitment to effectively implement, establish and maintain mitigation and compensation at all stages of the development process.
7 Brings Nature Closer to People	The Proposed Development is an operational site, limited public access or PRoW. The nature of the operation of the site restricts opportunities to bring people closer to nature. PRoW Surrounding the Order limits would not be affected.
8 Supports Equitable and Inclusive Places	The Proposed Development is an operational facility; this restricts opportunities to make the Proposed Development Site more equitable and inclusive.
9 Delivers Climate Resilient Water Management 10 Brings Water Closer to People	The assessment for watercourses impacted by the Proposed Development have been captured within the Water Framework Directive and **Report to Inform Habitats Regulations Assessment** (**EN010166/APP/6.12**). Proposed Development will avoid impact to all watercourses within the Order limits. Working buffers and active mitigation would be applied to all construction works surrounding watercourses on-site, to protect the resilience of watercourse. The **Framework CEMP** (**EN010166/APP/6.5**) details the measures required to manage the environmental effects of the Proposed Development and demonstrate

Standard	Justification for Meeting the Standard
	compliance with environmental legislation would be implemented.
Standard 11 Delivers Wildlife Enhancement	Trees and hedgerows removed as part of the Proposed Development would be replanted on-site with a 3:1 planting ratio. To achieve wildlife enhancement after the 9-year construction phase, all retained or permanently lost modified grassland, which would not be subject to the Proposed Development hardstanding footprint would be created/ enhanced to other neutral grassland in a moderate condition. To achieve wildlife enhancement after the 9-year construction phase, an area of OMH will be re-established and created. The management and monitoring criteria to secure the status of this habitat is detailed in Section 8 and detailed in the **Outline LEMP** (**EN010166/APP/6.9**).
12 Underpins Nature's Recovery	Habitat creation and or enhancement discussed in Section 6.4 and 7.5 will enhance the quality of existing habitat, improving and aiding nature recovery on and off-site. The GI implemented off-site as part of the **Off-Site NBB and GI Strategy (EN010166/APP/6.15)** will create effective links with existing and newly created ecological features to support the creation and restoration of the wider landscape.

7. Off-Site NBB and GI Delivery

7.1.1 To address the net loss of habitats and GI associated with the Proposed Development, off-site delivery is necessary. On-site options for habitat and green infrastructure compensation have been fully exhausted. As such, a suitable off-site delivery area was identified to provide habitat type necessary to achieve NBB. In addition, off-site mitigation is required for the loss of suitable Curlew *(Numenius arquata)* habitat, which is considered FLL. A specific area has been selected to deliver the required Curlew mitigation and meet the NBB and GI obligations.

7.2 Off-Site Delivery Area Strategy

7.2.1 A set of criteria was used to identify suitable sites for off-site Curlew mitigation and NBB/GI delivery. The criteria considered are as follows:

1. Proximity to the Order Limits;
2. Existing land use, pressures and habitats present;
3. Distance from the Dee Estuary/Aber Dyfrdwy SAC and Dee Estuary/Aber Dyfrdwy SPA, Ramsar and SSSI;
4. Desk based assessment and preliminary ecological appraisals of each off-site location;
5. Availability for purchase and opportunity for long-term management;
6. Existing levels of use by Curlew and other bird species; and
7. Land availability for the creation and enhancement of habitats in line with the habitats highlighted as net loss in Section 6.1.

7.3 Off-Site Delivery Area selection

Overview

7.3.1 At the pre-application stage, the Applicant undertook a process of identifying areas of potential suitable land for delivery of off-site NBB requirements. Factors considered in identifying these sites were:

- proximity to the Order limits;
- connectivity to the Order limits;
- area of the site;
- existing land use and habitats present; and
- availability for purchase and opportunity for management.

7.3.2 Following the identification of the potential sites, all identified land parcels were screened for their suitability for delivery of NBB requirements. A short list of sites was taken forward for further review through ecological walkovers and purchase of Cofnod local records data to verify desktop studies and confirm habitats present and their existing condition.

Sites Considered

7.3.3 Following the initial analysis of a long list of sites, the short listed sites considered by the Applicant were:

- Land at Kelsterton Farm (**Appendix F, Figure 5**);
- Land north of Weighbridge Road (**Appendix F, Figure 6**);
- Bagilt Fields (**Appendix F, Figure 7**); and
- Gronant Fields (**Appendix F, Figure 8**).

Land at Kelsterton Farm

7.3.4 Land at Kelsterton Farm is located approximately 250 m from the Main Development Area at its closest point, south of the A548. The grid reference for the approximate centre of the site is SJ 27306 70578.

7.3.5 Land at Kelsterton Farm is approximately 46.8 ha and compromises the following broad habitat types: grassland, cropland, hedgerows with lines of trees, standing water and woodland.

7.3.6 Following further discussions with the landowner, the site was no longer available to the Applicant for purchase.

Land north of Weighbridge Road

7.3.7 Land north of Weighbridge Road is located approximately 1 km from the Main Development Area, north of the River Dee. The grid reference for the approximate centre of the site is SJ 29422 71948.

7.3.8 Land north of Weighbridge Road comprises grassland and scattered blocks of mixed woodland/scrub restoration at the Broken Bank Tip former landfill site. There is plantation woodland, reedbed swamp pond habitat associated with the peripheral land adjacent to the A548.

7.3.9 The majority of Land north of Weighbridge Road is located within a historic landfill. There are also other uses of the site such as the Deeside Model Aircraft Club.

Bagillt Fields

7.3.10 Bagillt Fields are located 3.8 km from the Main Development Area, north-east of Maor Industrial Estate in Bedol, North Wales, as shown on **Appendix F, Figure 5**. The grid reference for the approximate centre of the site is SJ 23523 74296.

7.3.11 Bagillt Fields are bound to the north and east by the Dee Estuary, to the west by the North Wales Mainline and to the south by an area of woodland.

7.3.12 The area of this site is 21.7 ha and comprises modified grassland habitat with lines of trees and ditch.

7.3.13 Following further discussions with the landowner, agreement was not reached on the availability of the land on a long term basis for the delivery and management of the required habitat creation.

Gronant Fields

7.3.14 Gronant Fields is a 56.30 ha site located approximately 21 km north of the Main Development Area, where the Applicant is proposing to deliver mitigation for the loss of functionally linked land (FLL) which includes Curlew mitigation and covers 26 ha of the site. This leaves 30.30 ha to deliver habitat areas in excess of the Proposed Development's NBB requirements.

7.3.15 The site selected at Gronant Fields has good connectivity to the Main Development Area via the Dee Estuary, whilst it is acknowledged that it is 21 km from the Main Development Area, it is linked via the River Dee and along the predominantly undeveloped estuarine riparian habitat. Further to this, the coastline to the south of the Site is largely developed with the only large area of greenspace being south of Abergele with a continuation of urban habitat beyond this as far as Llandudno.

7.3.16 As such, Gronant Fields was selected as the preferred site for Off-site NBB delivery.

Preferred Site

7.3.17 As noted above, further to landowner discussions, two of the short-listed sites were no longer available to the Applicant for the delivery of Off-site NBB. The main reasons for the selection of the Gronant Fields site over the Land north of Weighbridge Road are as follows:

- there is no direct public access or other recreational activities on site;
- the baseline habitats and species known to be within Gronant Fields offer opportunities for enhancement whilst noting the limited requirement for woodland and scrub planting;
- the land is not identified to have potential contamination risks associated with the presence of a historic land fill site;
- the site offers opportunities for landscape scale biodiversity benefit at a scale proportionate to the off-site NBB requirements;
- the site offers opportunities to make wider habitat enhancements to compliment mitigation to be provided under the **Outline Curlew Implementation and Monitoring Plan (EN010166/APP/6.13)**.

7.4 Off-Site Delivery Area Baseline

7.4.1 An ecological walkover survey including UKHab Classification and condition assessment survey was undertaken of the accessible areas within the Off-Site Delivery area on the 2nd and 3rd June 2025. The following habitats were identified:

- Other non-cereal crops c1d8;
- Other neutral grassland g3c;
- Eutrophic standing water r1a;
- Other rivers/streams r2b;
- Other broadleaved woodland w1g;

- Other native hedgerow h2a6; and,
- Developed land; sealed surface u1b.

7.4.2 Further information on the ecological features present within the site are detailed in the Gronant Fields Preliminary Ecological Appraisal included as Appendix B of the **Off-Site NBB and GI Strategy** (**EN010166/APP/6.14**).

7.5 Off-Site Habitat Creation and Enhancement

7.5.1 Additional off-site NBB and GI delivery is required to account for habitat loss, associated with the permanent and temporary work within the Order limits. A ratio for habitat creation that accounts for high biodiversity value habitats that will be permanently lost within the Order limits should be applied to the Off-Site Delivery Area. These ratios have been taken from PPW12 guidance and developed from professional judgement. Compensation planting ratios are summarised below and must be applied within any creation or designated enhancements:

- Trees and woodland will be replaced at a minimum 3:1 ratio; Hedgerows (all hedgerows classified as important under the Hedgerows Regulations 1997 (Ref 44), will be replaced at a minimum of 3:1);
- Species-poor grassland will be enhanced to improve the baseline condition. Where possible, species-rich grassland will be created and targeted to a more desirable condition than on-site losses.

7.5.2 Approximately 26 ha of habitat creation and improvement is required within the Off-Site Delivery Area for Curlew mitigation and would be predominately managed wet grassland. For further details see the **Outline Curlew Implementation and Monitoring Plan** (**EN010166/APP/6.13**).

7.5.3 30.3 ha of the Off-Site Delivery Area falls outside the Curlew mitigation area. The Applicant is the owner of this land. This offers a chance to actively manage these habitats, ensuring the net benefit of highly distinctive habitats and GI features are secured. Additionally, plans for enhancing habitats in poor condition and creating measures in areas with currently low biodiversity interest would be developed for these parts of the site.

7.5.4 A comprehensive approach to off-site species and habitat mitigation/compensation has been implemented, ensuring alignment with the Stepwise Approach and DECCA framework requirements. The habitat created under the **Outline Curlew Implementation and Monitoring Plan (EN010166/APP/6.13)**, along with additional off-site NBB/GI compensation, will significantly enhance biodiversity. This initiative will improve ecosystem resilience and support the surrounding priority ecological networks, demonstrating a clear net benefit for biodiversity.

7.5.5 For further details in relation to the off-site compensation strategy see the **Off-Site NBB and GI Strategy** (**EN010166/APP/6.14**).

8. Management and Monitoring

8.1.1 All habitat creation and enhancement activities aimed at delivering NBB will be subject to ongoing management and monitoring. A minimum monitoring period of five years will apply to most habitats, with S7 Priority Habitats requiring at least 10 years of monitoring. The Applicant will remain responsible for the implementation, monitoring and maintenance of both on-site and off-site habitats, secured through appropriate legal mechanisms.

8.1.2 Mitigation and compensation creation/enhancement measures (see Section 6.4 and 7.5) are included within the **Framework CEMP** (**EN010166/APP/6.5**) and **Outline LEMP** (**EN010166/APP/6.9**) to ensure these measures are implemented fully.

8.1.3 The **Outline LEMP** (**EN010166/APP/6.9**) identifies the preliminary landscape provisions within the Order limits and any relevant mitigation and habitat compensation identified for NBB are identified in the **Off-Site NBB and GI Strategy** (**EN010166/APP/6.14**). Requirement 10 of the **Draft DCO** (**EN010166/APP/3.1**) secures that no stage of the authorised development may commence until a Landscape Environment Management Plan for that stage, in general accordance with the **Outline LEMP** (**EN010166/APP/6.9**), has been submitted to and approved by the relevant planning authority. The final LEMP(s) will include further detail on habitat creation and enhancement criteria for on on-site habitat creation and will include a clear timetable, management and monitoring commitments. The frequency of habitat monitoring will be in line with best practice. Similarly, an Off-site NBB Plan will provide these details for off-site habitat creation.

8.1.4 The monitoring of establishing habitats listed in **Table 6-2** and Section 7.5 should include a condition assessment. Post-construction monitoring will determine the efficacy of habitat creation and enhancement and help to identify where management, mitigation improvements or changes are necessary.

Additional Management and Monitoring

Connah's Quay Power Station Conservation Areas

8.1.5 In addition to the habitats secured, managed and monitored to deliver a net benefit under the DCO, the Applicant is legally responsible to maintain and manage 51 ha of habitat, surrounding Connah's Quay Power Station (split into 3 components) for the duration of the operation of Connah's Quay Power Station. These areas comprise Coastal Saltmarsh, trees, scrub and intertidal mudflats, which fall within European Marine Site (EMS), SSSI, Ramsar, SPA and SAC. The ongoing monitoring and management of these areas are ongoing and provide evidence of the Applicant's active support to deliver a net benefit surrounding their operational facilities.

9. Conclusion

9.1.1 This GI Statement has been prepared in line with the Stepwise Approach, the DECCA Framework and NRW's guidance on resilient ecological networks (Ref 31), and the BwNSF (Ref 28) to determine whether a NBB and effective GI delivery has been achieved.

9.1.2 The Proposed Development contributes to addressing biodiversity challenges identified in the Flintshire and Denbighshire Local Development Plans, as well as the North East Wales Area Statement (Ref 16), including reversing biodiversity loss and enhancing ecological resilience.

9.1.3 Most on-site habitats will be temporarily impacted during construction and reinstated post-works. For permanent habitat losses, and for designated areas subject to prolonged temporary impact, the Stepwise Approach and DECCA Framework have been applied. Where on-site compensation was not feasible, an Off-Site Delivery Area has been secured to address residual NBB and GI losses, and to provide dedicated Curlew mitigation. See the **Off-Site NBB and GI Strategy** (**EN010166/APP/6.14**) for further details. A comprehensive approach to off-site species and habitat mitigation/compensation has been implemented, ensuring alignment with the Stepwise Approach and DECCA framework requirements.

9.1.4 Further consultation between the Applicant, FCC, DCC and NRW continues to finalise the approach to off-site delivery, ensuring both a net benefit for biodiversity and additional curlew mitigation. Management and monitoring timescales will be adjusted following consultation and will be input into the final LEMP(s) which will detail the locations and extent of habitat creation and enhancements. The final LEMP(s) will set out the full details of the required habitat creation and management. The Applicant will remain responsible for the long-term delivery of all mitigation and enhancement measures, both on-site and off-site, to ensure NBB and satisfy GI requirements for the Proposed Development.

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Abbreviations

Abbreviation	Term
AGI	Above Ground Installation
AONB	Area of Outstanding Natural Beauty
BwNSF 2.0	Building with Nature Standards Framework 2.0
CEMP	Construction Environmental Management Plan
CQLCP	Connah's Quay Low Carbon Plant
CCGT	Combined Cycle Gas Turbines
CCP	Carbon Capture Plant
CO_2	Carbon Dioxide
C&IEA	Construction and Indicative Enhancement Area
DCC	Denbighshire County Council
DCO	Development Consent Order
DECCA	Diversity, Extent, Condition, Connectivity and Aspects of ecosystem resilience
DEFRA	Department for Environment, Food & Rural Affairs
DEMP	Decommissioning Environmental Management Plan
EIA	Environmental Impact Assessment
EMS	European Marine Site
ENG	Environmental Net Gain
FCC	Flintshire County Council
FLL	Functionally Linked Land
GCN	Great Crested Newt
GI	Green Infrastructure
HoPI	Habitats of Principal Importance
IEF	Important Ecological Feature
NBB	Net Benefit for Biodiversity
NGET	National Grid Electricity Transmission plc
NPS	National Policy Statements
NRW	Natural Resources Wales
Outline LEMP	Outline Landscape and Ecological Management Plan
OMH	Open Mosaic Habitat
PINS	Planning Inspectorate
PPW	Planning Policy Wales
PRoW	Public Right of Way
SAC	Special Areas of Conservation
SPA	Special Protection Areas

SSSI	Site of Special Scientific Interest
TANs	Technical Advice Notes
UKBAP	United Kingdom Biodiversity Action Plan

Appendix A – Baseline Constraints Plan

Figure 1 – Order limits

Figure 2 – Baseline Habitats

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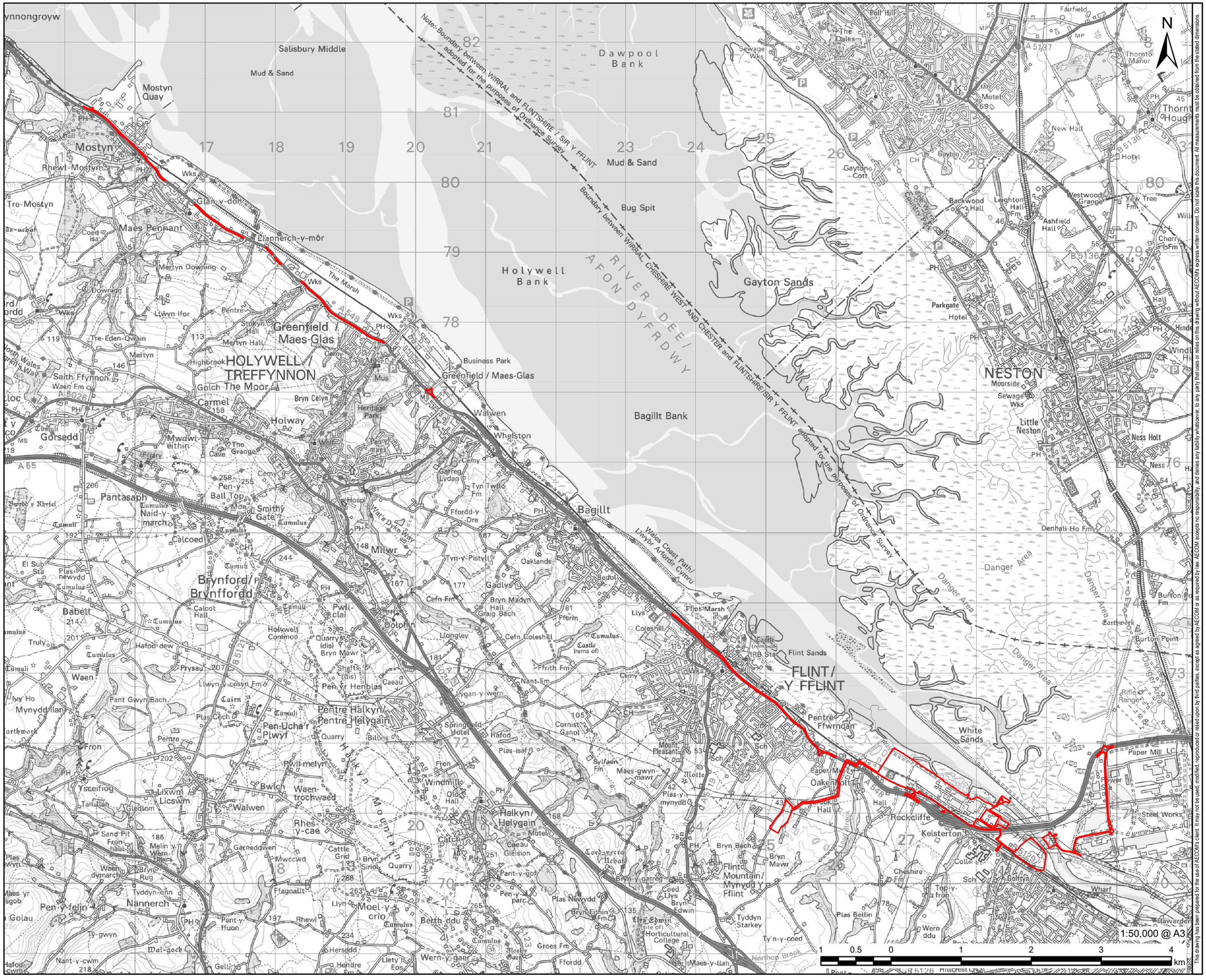

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LEGEND

Order limits

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Order limits

FIGURE NUMBER

Figure 1

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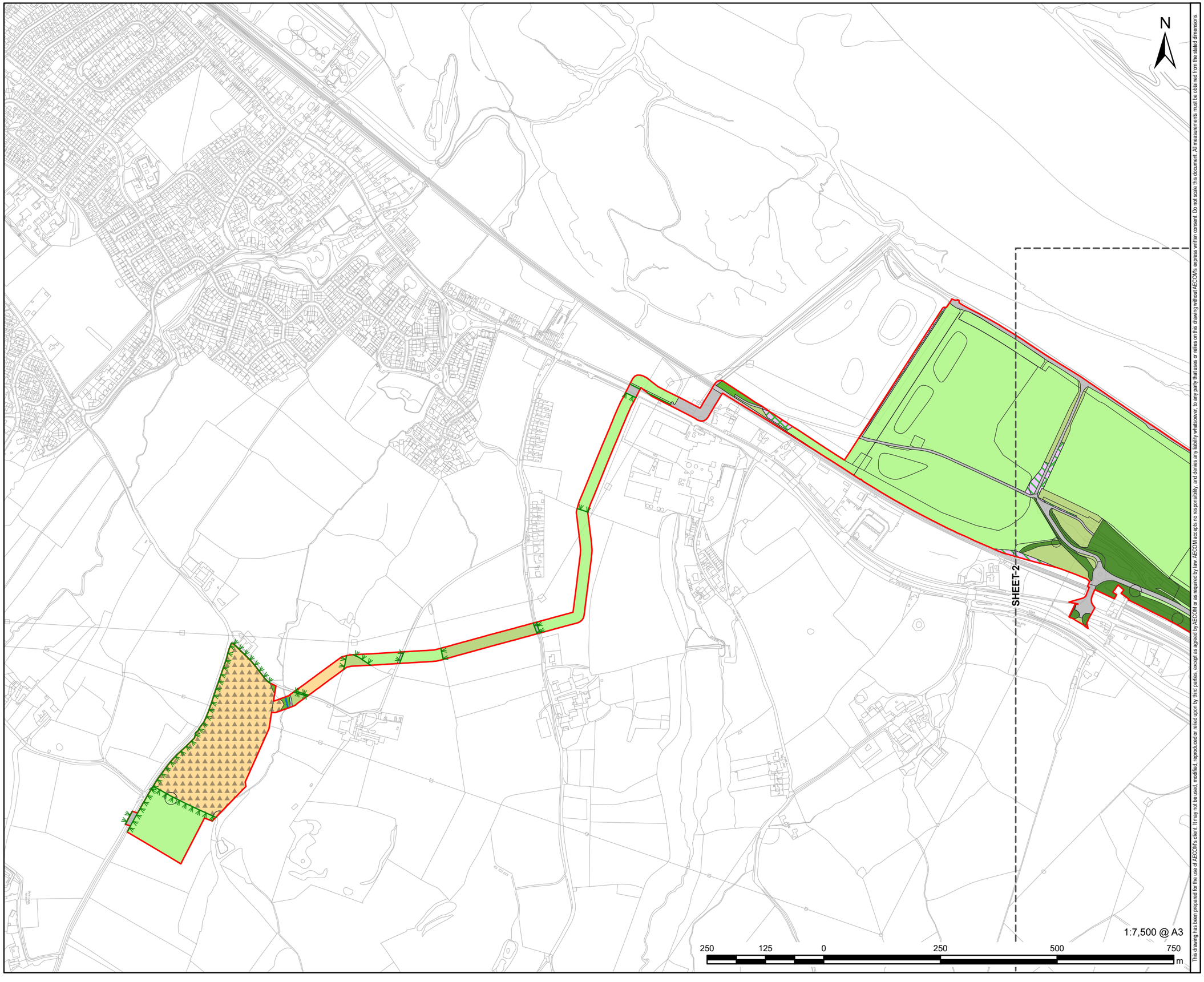

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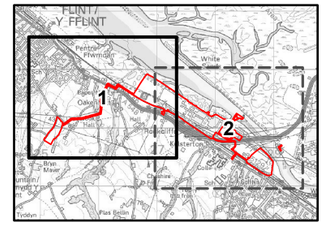
LEGEND

- Construction and Operation Area
- h2a5 - Species rich native hedgerow
- h2a6 - Other native hedgerow
- h2b - Non-native and ornamental hedgerow
- r2b - Other rivers and streams
- t2d - Intertidal mudflats
- c1c7 - Other cereal crops
- c1b - Temporary grass and clover leys
- g3c - Other neutral grassland
- g4 - Modified grassland
- h3d - Bramble scrub
- h3h - Mixed scrub
- u1c - Artificial unvegetated, unsealed surface
- u1d - Developed land; sealed surface
- f2b - Purple moor grass and rush pastures
- w1f7 - Other lowland mixed deciduous woodland
- w1g - Other broadleaved woodland



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Baseline Habitats
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Figure 2

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1:7,500 @ A3

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LEGEND

- Construction and Operation Area
- h2a5 - Species rich native hedgerow
- h2a6 - Other native hedgerow
- h2b - Non-native and ornamental hedgerow
- t2a - Coastal saltmarsh
- t2d - Intertidal mudflats
- g1c - Bracken
- g3c - Other neutral grassland
- g4 - Modified grassland
- h3c 6 - Other sea-buckthorn scrub
- h3d - Bramble scrub
- h3h - Mixed scrub
- u1c - Artificial unvegetated, unsealed surface
- u1d - Developed land; sealed surface
- u1 847 - Introduced shrub
- u1f 80 - Open Mosaic Habitat on previously developed land
- w1 - Broadleaved mixed and yew woodland
- w1f7 - Other lowland mixed deciduous woodland
- w1g - Other broadleaved woodland

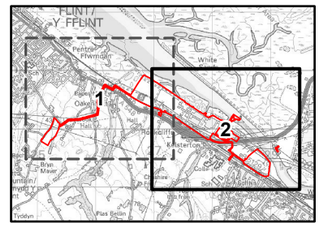

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FIGURE TITLE

Baseline Habitats
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Figure 2

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Appendix B – Landscape Masterplan

Figure 3 – Indicative Landscape Plan

Figure 4 – Permanent and Temporary Habitat Loss

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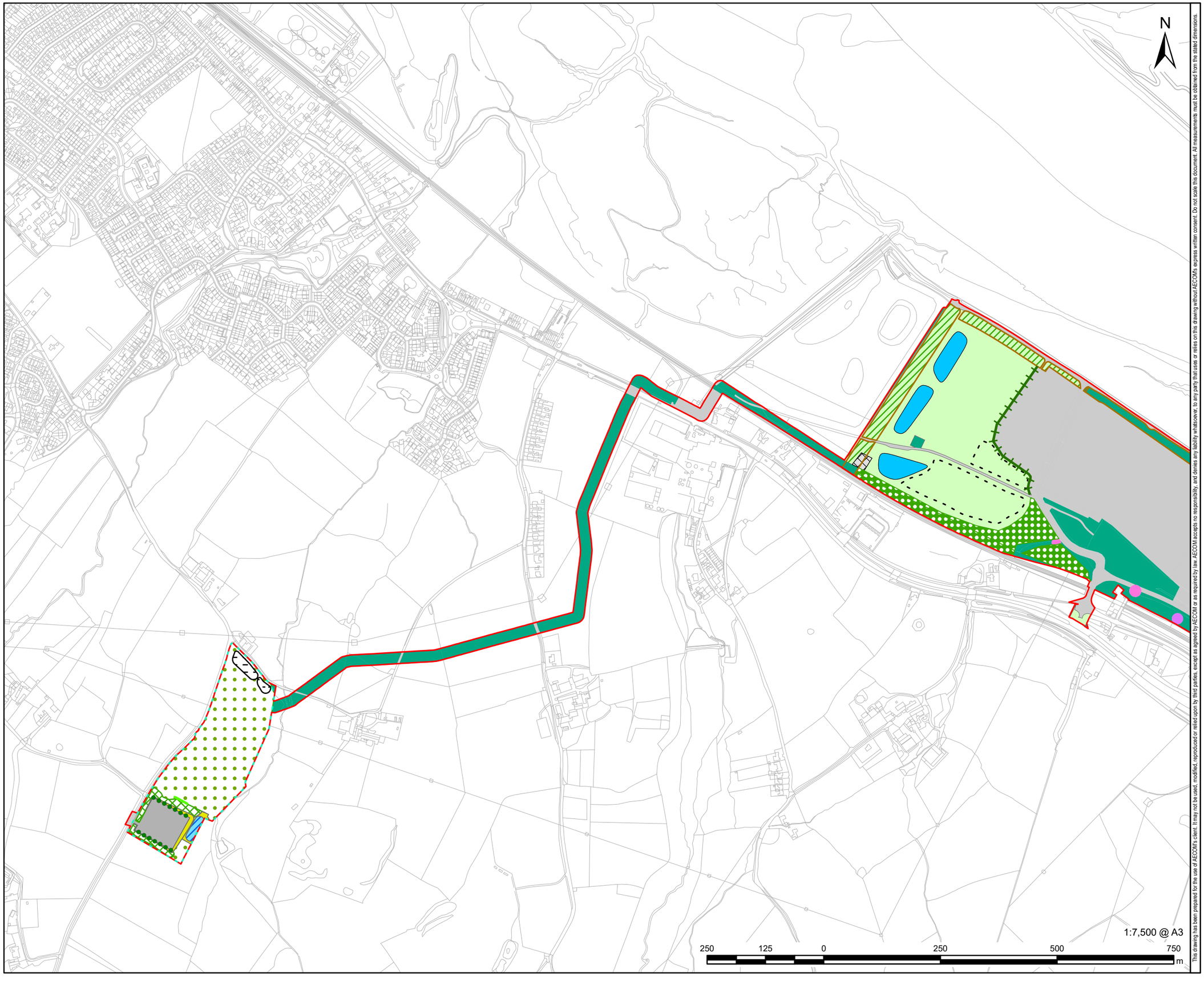

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LEGEND

- Construction and Operation Area
- Operational Footprint / Hardstanding
- Retained Habitat - Not Affected by Development
- Retained Habitat - Ancient Tree Root Protection Area (RPA)
- Retained Habitat - Veteran Tree Root Protection Area (RPA)
- Ecological Safeguard Zone

Landscaping to be Delivered Under the HyNet DCO

- Native Double Staggered Hedgerow
- Native Triple Staggered Hedgerow
- Hardstanding
- Indicative Ephemeral Detention Pond
- Made Good / Return to Prior Use
- Native Shrub Planting
- Species Rich Grassland
- Tree Screen Planting
- Extent of HyNet Landscaping Proposals within the Order limits

Indicative Landscape Plan

- Species Rich Hedgerow
- Grassland
- Grassland enhanced as species-rich, wildflower
- Pulverised Fuel Ash
- Shallow Scrape
- Woodland
- Indicative Tree Planting Area

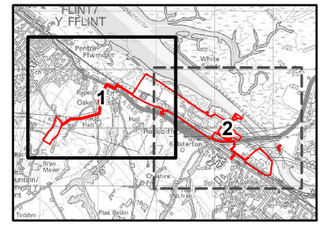

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FIGURE TITLE

Indicative Landscape Plan
Sheet 1 of 2

FIGURE NUMBER

Figure 3

Revision: 1 Drawn: HS Checked: LP Approved: KK Date: 2026-03-01

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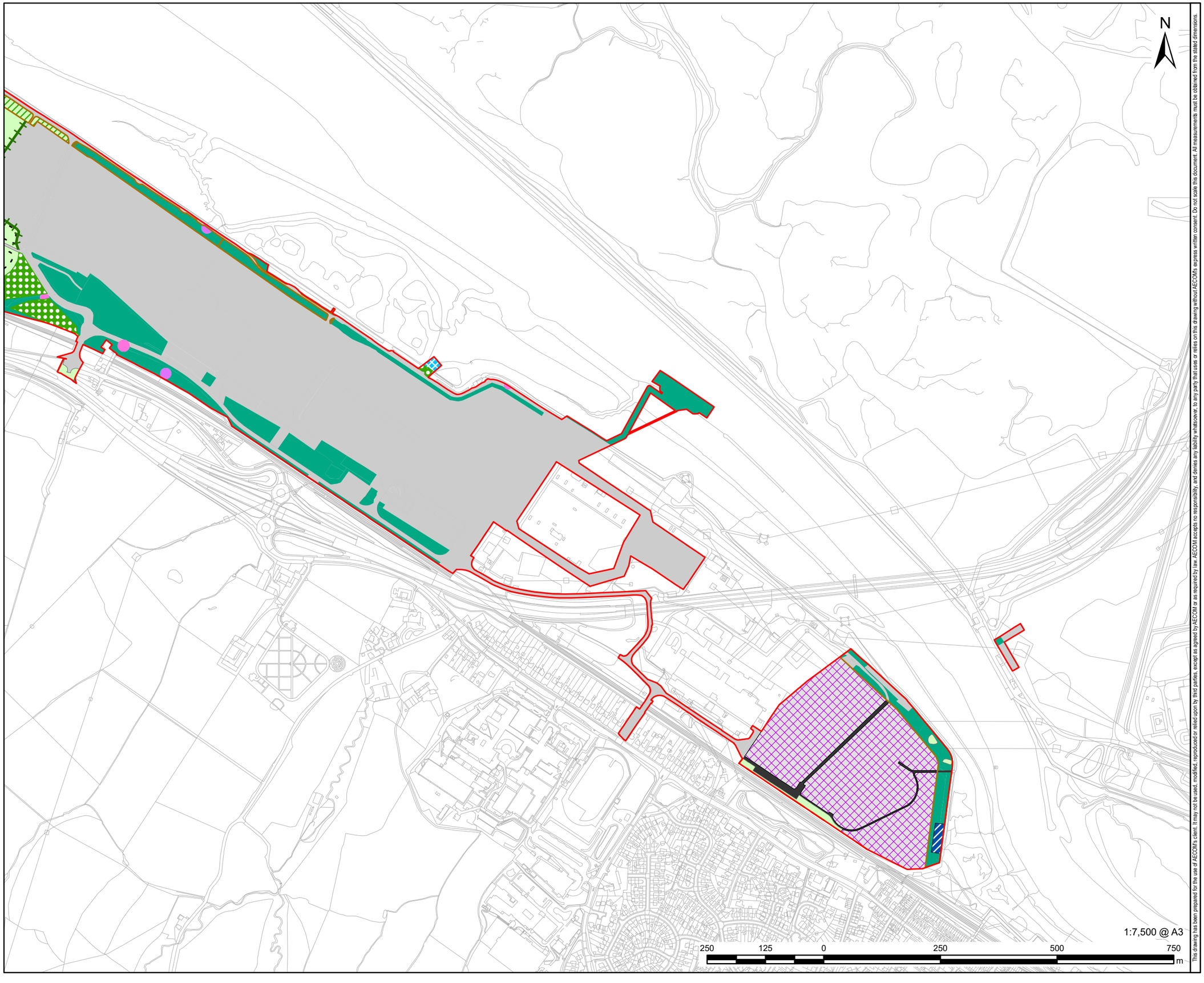


AECOM uniper

PROJECT

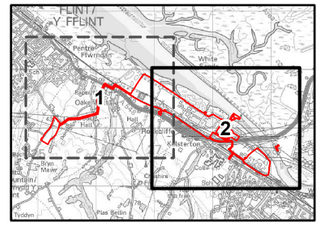
Connah's Quay Low Carbon Power

CONSULTANT

AECOM Limited
The Colmore Building
Colmore Circus, Queensway
Birmingham, B4 6AT
www.aecom.com

LEGEND

- Construction and Operation Area
- Operational Footprint / Hardstanding
- Retained Habitat - Not Affected by Development
- Retained Habitat - Ancient Tree Root Protection Area (RPA)
- Retained Habitat - Veteran Tree Root Protection Area (RPA)
- Ecological Safeguard Zone
- Species Rich Hedgerow
- Access Track / Hardstanding
- Grassland
- Grassland enhanced as species-rich, wildflower
- Hardstanding within Main Development Area
- Saltmarsh Habitat Creation
- Saltmarsh Habitat Reinstated
- Woodland
- Indicative Tree Planting Area



NOTES

ISSUE PURPOSE

Green Infrastructure Statement

DATE

March 2026

PROJECT NUMBER

60768754

FIGURE TITLE

Indicative Landscape Plan
Sheet 2 of 2

FIGURE NUMBER

Figure 3

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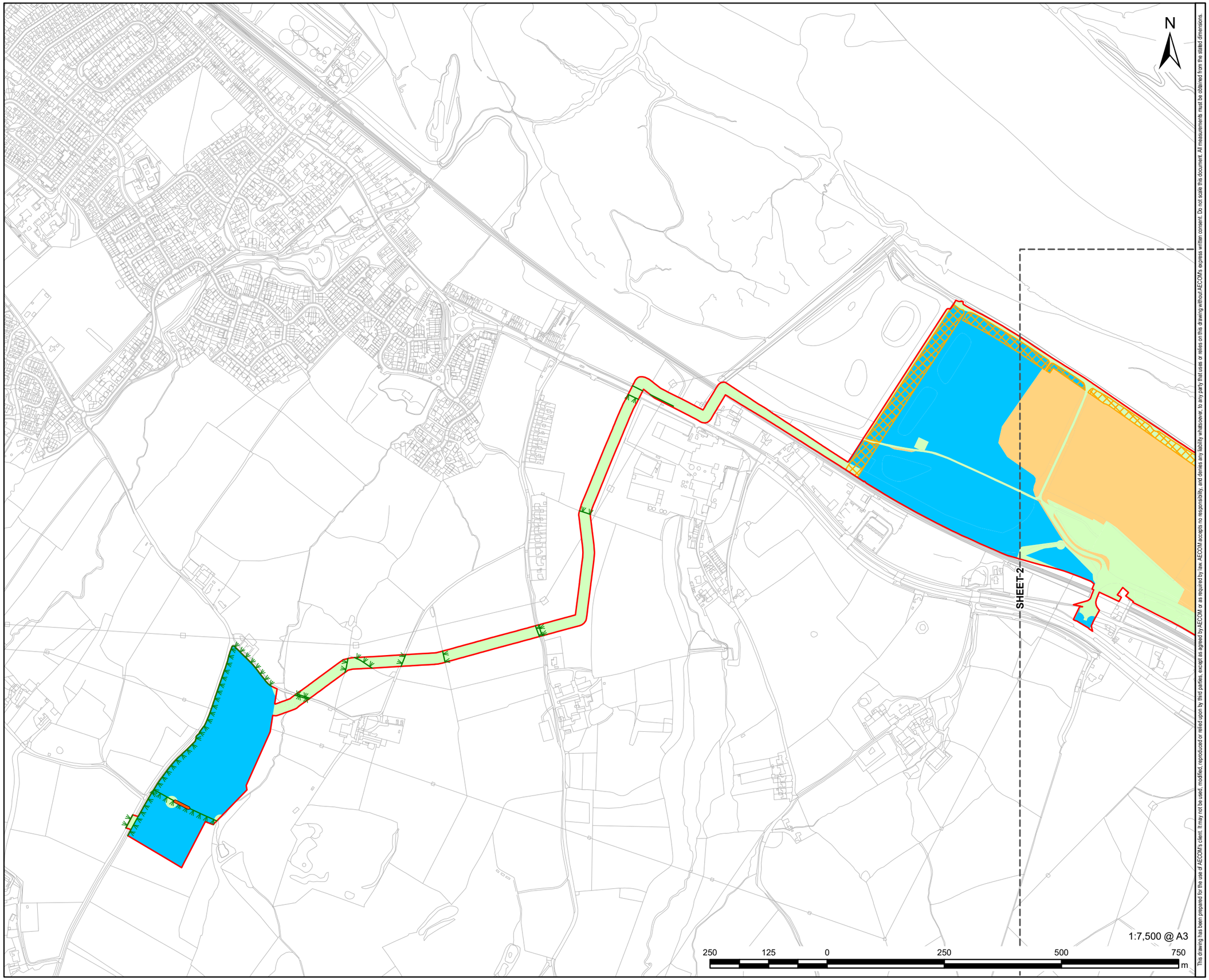

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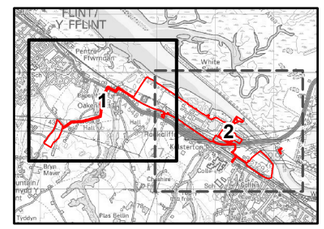
LEGEND

- Construction and Operation Area
- Ecological Safeguard Zone
- Hedgerow Removal
- h2a5 - Species rich native hedgerow
- h2a6 - Other native hedgerow
- Retained Habitat
- Permanent Loss
- Temporary Loss



NOTES

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Green Infrastructure Statement

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PROJECT NUMBER

60768754

FIGURE TITLE

Permanent and Temporary Habitat Loss
Sheet 1 of 2

FIGURE NUMBER

Figure 4

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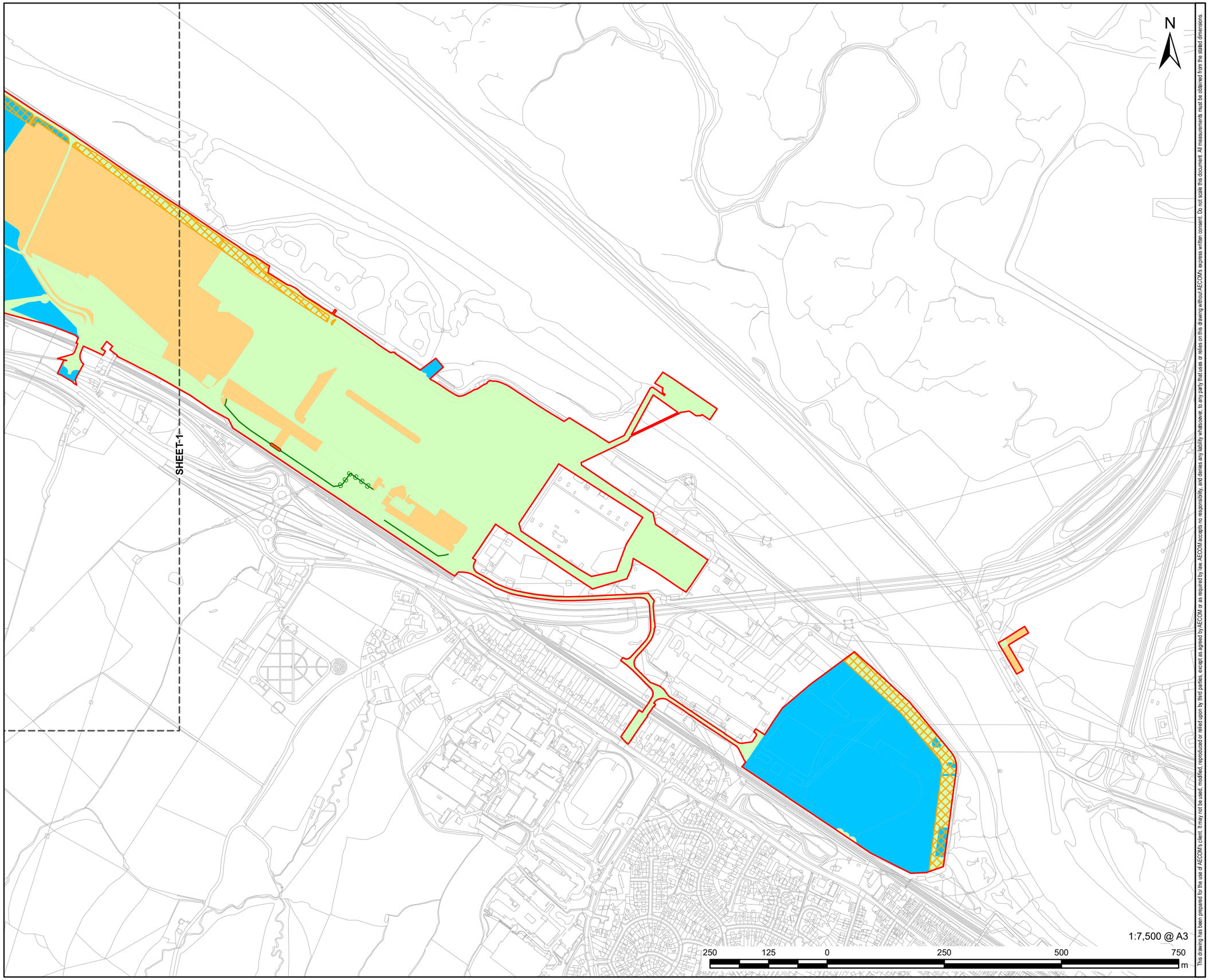
Revision: 1 Drawn: HS Checked: LP Approved: KK Date: 2026-03-01



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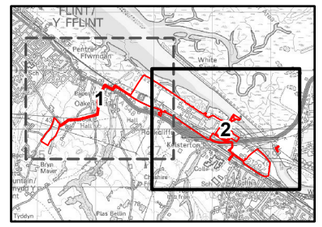
LEGEND

- Construction and Operation Area
- Ecological Safeguard Zone
- Hedgerow Removal
- h2a6 - Other native hedgerow
- h2b - Non-native and ornamental hedgerow
- Retained Habitat
- Permanent Loss
- Temporary Loss



NOTES

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Green Infrastructure Statement

DATE

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FIGURE TITLE

Permanent and Temporary Habitat Loss
Sheet 2 of 2

FIGURE NUMBER

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Appendix C – Summary of Legislation and Policy

The UK is no longer a member of the European Union (EU). EU legislation as it applied to the UK on 31 December 2020 is now a part of the UK domestic legislation. EU legislation which applied directly or indirectly to the UK before 11.00pm on 31 December 2020 has been retained in UK law as a form of domestic legislation known as 'retained EU legislation'.

The Secretary of State for the Environment, Food and Rural Affairs and Welsh Ministers have made changes to parts of the *Conservation of Habitats and Species Regulations 2017* (referred to as the 2017 Regulations) so that they operate effectively. Most of these changes involve transferring functions from the European Commission to the appropriate authorities in England. All other processes or terms in the 2017 Regulations remain unchanged and existing guidance is still relevant.

Designated Sites

Locally Designated Sites

Local Wildlife Sites (LWSs) are sites with 'substantive nature conservation value' and include SINCs. They are defined areas, identified and selected for their nature conservation value, based on important, distinctive and threatened habitats and species within a region.

They are usually selected by the relevant Wildlife Trust, along with representatives of the local authority and other local wildlife conservation groups.

The LWS selection panel selects all sites that meet the assigned criteria, unlike SSSIs which for some habitats are a representative sample of sites that meet the national standard. Consequently, many sites of SSSI quality are not designated and instead are selected as LWSs. LWSs can therefore be amongst the best sites for biodiversity.

Protected Species

Bats/Otter

These species, known as European Protected Species, are protected under Regulation 43 of the 2017 Regulations as amended. This makes it an offence to:

- **deliberately capture, injure or kill an animal.**
- **deliberately disturb an animal; or,**
- **damage or destroy a breeding site or resting place used by an animal.**

Deliberate capture or killing is taken to include 'accepting the possibility' of such capture or killing. Deliberate disturbance of animals includes in particular any disturbance which is likely to:

- **impair their ability to survive, breed, reproduce or rear or nurture young;**
- **in the case of animals of hibernating or migratory species, to hibernate or migrate; or,**

- **significantly affect the local distribution or abundance of the species to which they belong.**

Where development works are at risk of causing one or more of the offences listed above, a mitigation licence from Natural Resources Wales can be obtained to facilitate the works that would otherwise be illegal.

These species are also protected under Schedule 5 of the *Wildlife and Countryside Act 1981* (as amended). This makes it an offence to intentionally or recklessly obstruct access to any structure or place used for shelter or protection or disturb an animal in such a place.

Lower levels of disturbance not covered by the *Conservation of Habitats and Species Regulations 2017* (as amended) remain an offence under the *Wildlife and Countryside Act 1981* although a defence is available where such actions are the incidental result of lawful activity that could not reasonably be avoided.

Nesting Birds

All wild birds are protected under the *Wildlife and Countryside Act 1981* (as amended), with some species afforded great protection under Schedule 1 of the *Wildlife and Countryside Act 1981* (as amended). In addition to the protection from killing or taking that all birds receive; Schedule 1 birds and their young must not be disturbed at, or in the vicinity of the nest.

There are no licensing purposes that explicitly cover development activities affecting wild birds.

Common Species of Reptile (common lizard, slow worm, grass snake and adder)

Common species of reptile are protected against intentional killing and injury under Schedule 5 of the *Wildlife and Countryside Act 1981* (as amended). There is no requirement for a licence where development works affect common species of reptiles. Instead, Natural Resources Wales advise[26] that where reptiles are present, they should be protected from any harm that might arise during the development works through appropriate mitigation.

Badger

Badgers and their setts are protected under the *Protection of Badgers Act 1992* (as amended). This makes it an offence to:

- **wilfully kill, injure or take a badger;**
- **intentionally or recklessly damage, destroy or obstruct access to a badger sett; or,**
- **disturb a badger in its sett.**

It is not illegal to carry out disturbance activities near setts that are not occupied, *i.e.* those that do not show signs of current use.

Where required, licences for development activities involving disturbance or sett interference or closure are issued by Natural Resources Wales. Licences for activities involving watercourse maintenance, drainage works, or flood defences are issued under a separate process.

When assessing the requirement for a licence in respect of development, Natural Resources Wales state that badgers are relatively tolerant of moderate levels of noise and activity around their setts, and that a low or moderate level of apparent disturbing activity at or near to badger setts does not necessarily disturb the badgers occupying these setts[27].

Licences are normally not granted from December to June inclusive (the badger breeding season) because dependent cubs may be present within setts.

Species and Habitats of Principal Importance for the Conservation of Biodiversity

Section 7 of the *Environment (Wales) Act 2016* sets out the duty for public authorities to conserve biodiversity in Wales. Habitats and species of principal importance for the conservation of biodiversity are referred to in Section 7 of the *Environment (Wales) Act 2016*. The list can be found on the Natural Resources Wales website[28].

The list is used as a guide for decision makers such as public bodies, including local and regional authorities, in implementing their duty under Section 7 of the *Environment (Wales) Act 2016* to have regard to the conservation of biodiversity in Wales when carrying out their normal functions.

Hedgerows

Under the Hedgerow Regulations 1997, it is against the law to remove or destroy certain hedgerows without permission from the local planning authority. In general, permission will be required before removing hedges that are at least 20 m in length, over 30 years old and contain certain species of plant. The local planning authority will assess the importance of the hedgerow using criteria set out in the regulations.

Invasive Non-Native Plant Species

Under the *Wildlife and Countryside Act 1981* (as amended), it is an offence to plant or otherwise cause species listed under Schedule 9 Part II to grow in the wild.

Species listed on Invasive Alien Species of Union concern under the *Invasive Alien Species (Enforcement and Permitting) Order 2019* are subject to restrictions and measures set out in the Regulation. These include restrictions on keeping, importing, selling, breeding, growing and releasing into the environment.

Any contaminated soil or plant material is classified as controlled waste and should be disposed of in a suitably licensed landfill site, accompanied by appropriate Waste Transfer documentation, and must comply with section 34 of the *Environmental Protection Act 1990.*

Environment Act (Wales 2016).

The Environment (Wales) Act 2016 replaced the existing biodiversity duty (in the Natural Environment and Rural Communities Act 2006) which required public authorities to have a regard to conserving biodiversity. The new Section 6 duty takes this further, requiring all public authorities, when carrying out their functions in Wales, to seek to "maintain and enhance biodiversity" where it is within the proper exercise of their functions. In doing so, public authorities must also seek to "promote the resilience of ecosystems". This was introduced to plan and manage Wales' natural resources in a sustainable and joined-up way and is intended to work alongside the Wellbeing of Future Generations Act 2015

The Well-being of Future Generations Act 2015

The Wellbeing of Future Generations Act 2015 requires national government, local government, local health boards and other specified public bodies to carry out sustainable development and work towards objectives that contribute to seven wellbeing goals. Sustainable development in the Act means "*the process of improving the economic, social, environmental and cultural wellbeing of Wales by taking action, in accordance with the sustainable development principle (i.e. not compromising the ability of future generations to meet their needs), aimed at achieving the well-being goals*".

Nature Recovery Action Plan (Wales) (NRAP)

The NRAP complements The Well-being of Future Generations (Wales) Act 2015 and the Environment Act (Wales) 2016. The NRAP[29] sets out how the United Nations Environment Program's Convention on Biological Diversity's (CBD) Strategic Plan for Biodiversity (and the associated Aichi Biodiversity Targets for 2011-20 in Wales) is addressed in Wales[30]. The ambition of the plan is 'To reverse the decline in biodiversity, for its intrinsic value, and to ensure lasting benefits to society'. The NRAP is split into three parts:

Part 1: Our Strategy for Nature sets out the commitment to reversing the loss of biodiversity in Wales, and the objectives for action. These objectives are listed below:

- **Engage and support participation and understanding to embed biodiversity throughout decision making at all levels.**
- **Safeguard species and habitats of principal importance and improve their management.**
- **Increase the resilience of our natural environment by restoring degraded habitats and habitat creation.**
- **Tackle key pressures on species and habitats.**
- **Improve our evidence, understanding and monitoring.**
- **Put in place a framework of governance and support for delivery.**

Planning Policy

Planning Policy Wales, 2024

PPW sets out the land use planning policies of Welsh Government. It is supplemented by a series of TANs, Welsh Government Circulars, and policy clarification letters, which together with PPW provide the national planning policy framework for Wales.

Chapter 6. Distinctive and Natural Places outlines the Welsh Government's objectives for the environmental and cultural components of placemaking. These components are complementary to those of the Active and Social and Productive and Enterprising themes and collectively the three themes come together to contribute towards the national sustainable placemaking outcomes.

The Environment (Wales) Act 2016 Part 1 – Section 6 'Biodiversity and resilience of ecosystems duty' states that public authorities "*must seek to maintain and enhance biodiversity in the exercise of functions in relation to Wales, and in so doing promote the resilience of ecosystems, so far as consistent with the proper exercise of those*

functions". Planning Policy Wales (PPW) expands on this by stating that "*This means development should not cause any significant loss of habitats or populations of species, locally or nationally and must provide a net benefit for biodiversity".*

To facilitate the fulfilment of Section 6, an NBB approach has been adopted by the Welsh Government. This approach has been included in the 12th edition of PPW[31] and sets out the requirement for a Green Infrastructure Statement. Relevant sections of PPW are:

- Paragraph 6.2.11: The quality of the built environment should be enhanced by integrating green infrastructure into development through appropriate site selection and use of creative design. With careful planning and design, informed by an appropriate level of assessment, green infrastructure can embed the benefits of biodiversity and ecosystem services into new development and places, help to overcome the potential for conflicting objectives, and contribute to health and well-being outcomes.
- Paragraph 6.2.12: A green infrastructure statement should be submitted with all planning applications. This will be proportionate to the scale and nature of the development proposed and will describe how green infrastructure has been incorporated into the proposal… The green infrastructure statement will be an effective way of demonstrating positive multi-functional outcomes which are appropriate to the site in question and must be used for demonstrating how the step-wise approach (see 'Method of Approach' below) has been applied.
- Paragraph 6.2.13: There are multiple ways of incorporating green infrastructure, depending on the needs and opportunities a site presents, and the green infrastructure assessment should be referred to, as appropriate, in order to ascertain local priorities… In most cases the green infrastructure statement should highlight any baseline data considered and surveys and assessments undertaken, including but not limited to, habitats and species surveys, arboricultural surveys and assessments, sustainable drainage statements, landscape and ecological management plans, open space assessments and green space provision and active travel links.
- Section 6.4 addresses Biodiversity and Ecological Networks. The policy includes the duties and requirements set out in Section 6 the Environment Wales Act (2016) and pays due regard to the State of Natural Resources Report (Natural Resources Wales (NRW), 2016) by taking all reasonable steps to maintain and enhance biodiversity. There is a focus on ecosystem services and the benefits of protecting and enhancing biodiversity.

The relevant measures in place to conserve landscape and biodiversity include:

- Statutory designations;
- Non-statutory designations;
- Maintaining and enhancing biodiversity;
- Ecosystem resilience and connectivity of ecological networks; and,
- Protection and consideration of protected and notable species and habitats.
- Sections relevant to this Green Infrastructure Statement are detailed below.
- Paragraph 6.4.5: Planning authorities must seek to maintain and enhance biodiversity in the exercise of their functions. This means development should not

cause any significant loss of habitats or populations of species (not including non-native invasive species), locally or nationally and must work alongside nature and it must provide a net benefit for biodiversity and improve, or enable the improvement, of the resilience of ecosystems. A net benefit for biodiversity is the concept that development should leave biodiversity and the resilience of ecosystems in a significantly better state than before, through securing immediate and long-term, measurable and demonstrable benefit, primarily on or immediately adjacent to the site. The step-wise approach outlined below is the means of demonstrating the steps which have been taken towards securing a net benefit for biodiversity. In doing so, planning authorities must also take account of and promote the resilience of ecosystems, in particular the following attributes, known as the DECCA Framework:

  - diversity between and within ecosystems;
  - the extent or scale of ecosystems;
  - the condition of ecosystems including their structure and functioning;
  - the connections between and within ecosystems; and
  - adaptability of ecosystems including their ability to adapt to, resist and recover from a range of pressures likely to be placed on them through climate change for example.

- Paragraph 6.4.21: Planning authorities must follow a step- wise approach to maintain and enhance biodiversity, build resilient ecological networks and deliver net benefits for biodiversity by ensuring that any adverse environmental effects are firstly avoided, then minimised, mitigated, and as a last resort compensated for. Enhancement must be secured by delivering a biodiversity benefit primarily on site or immediately adjacent to the site, over and above that required to mitigate or compensate for any negative impact.
- Paragraph 6.4.12: Having worked iteratively through the stages of the step-wise approach (see 'Method of Approach' below), and providing evidence in the Green Infrastructure Statement that the step-wise approach has been followed, a scheme of enhancements must be provided to ensure a NBB. Where biodiversity enhancement proportionate to the scale and nature of the development is not proposed as part of an application, significant weight will be given to its absence, and unless other significant material considerations indicate otherwise, it will be necessary to refuse permission.
- Paragraph 6.4.13: Improving ecosystem resilience, particularly improving connectivity to the immediate surroundings, would be a key contribution to on-site avoidance, minimisation, and mitigation strategies and enhancement. How a development would improve the attributes of resilience should be demonstrated as far as this is reasonably practical.
- Paragraph 6.4.20: Statutorily designated sites must be protected from damage and deterioration, with their important features conserved and enhanced by appropriate management. The contribution of the designated site to wider resilient ecological networks should be recognised and captured as part of a strategic approach to planning policy and decision making. The links between planning and wider management activity for the restoration and recovery of nature should be made. Complementary, and joint, action between all sectors and beyond the boundaries of the designated sites themselves is necessary to improve extent, connectivity and adaptability and address the nature emergency.

- Paragraph 6.4.29: SACs and SPAs are of European importance. Under the Conservation of Habitats and Species Regulations (2017) (the Habitats Regulations), all public bodies (including planning authorities) must have regard to the requirements of the EC Habitats and Birds Directives when carrying out their functions. SACs and SPAs on land are underpinned by notification as SSSIs and hence subject to protection afforded by the SSSI provisions. Before authorising development or adopting a land use plan which is likely to have a significant effect on a SAC or SPA (including where outside the boundary of the SAC or SPA), planning authorities must carry out an appropriate assessment of the implications for the designated features, consult NRW and have regard to NRW's representations. The development can normally only be authorised, or the plan adopted, if the planning authority ascertains that it wil not adversely affect the integrity of the site, if necessary, considering any additional measures, planning conditions or obligations.
- Paragraph 6.4.31: Although non-statutory designations do not have a statutory process for their protection, Sites of Importance for Nature Conservation, Local Wildlife Sites, Local Nature Reserves, and Regionally Importance Geodiversity Sites make a vital contribution to delivering an ecological network for biodiversity and resilient ecosystems, and they should be given protection in development plans and the development management process.
- Paragraph 6.4.35: The presence of a species protected under European or UK legislation, or under Section 7 of the Environment (Wales) Act 2016 is a material consideration when a planning authority is considering a development proposal which, if carried out, would be likely to result in disturbance or harm to the species or its habitat and to ensure that the range and population of the species is sustained.
- Paragraph 6.4.39: Planning authorities should protect trees, hedges, groups of trees and areas of woodland where they have ecological value, contribute to the character or amenity of a particular locality, or perform a beneficial green infrastructure function.
- Paragraph 6.4.26: Ancient woodland, semi-natural woodlands, individual ancient, veteran and heritage trees and ancient hedgerows are irreplaceable natural resources, and have significant landscape, biodiversity and cultural value. Such trees, woodlands and hedgerows are to be afforded protection from development which would result in their loss or deterioration unless very exceptionally there are significant and clearly defined public benefits; this protection must prevent potentially damaging operations and their unnecessary loss.
- Paragraph 6.4.44: the protection and planting of trees and hedges should be delivered, where appropriate, through locally specific strategies and policies, through imposing conditions when granting planning permission, and/or by making Tree Preservation Orders (TPOs).

Technical Advice Note 5 (TAN5) Nature Conservation and Planning

- The PPW is supplemented by a series of TANs. TAN 5 provides guidance on how the land use planning system should contribute to protecting and enhancing biodiversity and geological conservation. It provides advice on areas including the key principles of positive planning for nature conservation, nature conservation in Local Development Plans and development management procedures. It also

provides advice on development affecting designated sites and habitats, in addition to protected or habitats and species of principal importance.

- Key Principles include that the town and country planning system in Wales should integrate nature conservation into all planning decisions; that the town and country planning system should look for development to provide a net benefit for biodiversity conservation with no significant loss of habitats or populations of species, locally or nationally and that they should ensure that the UK's international and national obligations for site, species and habitat protection are fully met in all planning decisions.

The National Plan

The National Plan 2024 sets out Wales' national development framework that details the Welsh Government's twenty-year plan for shaping the growth and development of the country. Relevant to this Green Infrastructure Statement is Policy 9 – Resilient Ecological Networks and Green Infrastructure which is outlined below:

- identify areas which should be safeguarded and created as ecological networks for their importance for adaptation to climate change, for habitat protection, restoration or creation, to protect species, or which provide key ecosystems services, to ensure they are not unduly compromised by future development; and
- identify opportunities where existing and potential green infrastructure could be maximised as part of placemaking, requiring the use of nature-based solutions as a key mechanism for securing sustainable growth, ecological connectivity, social equality and well-being.

Planning authorities should include these areas and/or opportunities in their development plan strategies and policies in order to promote and safeguard the functions and opportunities they provide. In all cases, action towards securing the maintenance and enhancement of biodiversity (to provide a net benefit), the resilience of ecosystems and green infrastructure assets must be demonstrated as part of development proposals through innovative, nature-based approaches to site planning and the design of the built environment.

Appendix D – UKHab – Phase 1 translation

UKHab Habitat Type	Phase 1 Habitat Translation
Coastal saltmarsh (t2a)	Saltmarsh (B2)
Intertidal mudflats (t2d)	Intertidal (H1)
Modified grassland (g4)	Improved grassland (B4)
Other neutral grassland (g3c)	Poor/ Good semi-improved grassland (B6)
Bracken (g1c)	Bracken (C1)
Mixed scrub (h3h	Scrub - dense/continuous (A2.1)
Bramble scrub (h3d	Scrub - dense/continuous (A2.1)
Other cereal crops (c1c7)	Cultivated/disturbed land – arable (J1.1)
Purple Moor grass and rush pastures (f2b)	Marsh/marshy grassland (B5)
Other rivers and streams (r2b)	Running water (G2)
Other lowland mixed deciduous woodland (w1f7)	Broadleaved woodland - semi-natural (A1.1.1)
Other broadleaved woodland (w1g)	Broadleaved woodland – plantation (A1.1.2)
Suburban mosaic of Developed and natural surface (u1d)	Quarry, Spoil, Mine, Ephemeral/short perennial, Bare Ground.
Sparsely vegetated urban land (u1f) 81	Ephemeral/short perennial vegetation (J1.3)
Artificial unvegetated, unsealed surface (u1c)	Bare Ground (J4)
Developed land sealed surface (u1b)	Hardstanding (J3.6)
Introduced shrub (u1) 847	Introduced shrub (J1.4)
Open Mosaic Habitat on previously developed land (u1f) 80	Quarry, Spoil, Mine, Ephemeral/short perennial, Bare Ground.
Buildings (u1b5)	Buildings (J3.6)
Line of trees (w1g) 33	Hedgerow with trees (J2.3)
Non-native and ornamental hedgerow (h2b)	Species-poor hedge (J2.1)
Species rich native hedgerow (h2a5)	Intact hedge - native species-rich (J2.1.1) Defunct Hedge – native species rich (J2.1.1)
Other native hedgerow (h2a6)	Intact hedge - species-poor (J2.1)

Appendix E – DECCA Baseline Overview

Broad Ecosystem Type	Diversity	Extent	Conditions	Connectivity	Adaptability to Change
Designated Sites • Aber Afon Dyfrdwy / The Dee Estuary SPA; Ramsar, SAC, SSSI	High diversity of habitats including intertidal mud and sandflats, saltmarsh and transitional habitats. The Dee Estuary is one of the most important estuaries in Britain and amongst the most important in Europe for its populations of waders and wildfowl. The estuary is particularly important for its wintering bird populations and both waders and- wildfowl achieve numbers of international importance. Other notable species include Portland spurge *Euphorbia portlandica,*	Aber Afon Dyfrdwy / The Dee Estuary covers a total area of 13,679.7 ha with areas of functionally linked land also being of importance for a range of protected and notable species.	The SSSI citation for Aber Afon Dyfrdwy / The Dee Estuary reports that the designated site is in favourable condition.	Aber Afon Dyfrdwy / The Dee Estuary provides significant connectivity across the landscape for a range of bird species and is the most prominent habitat feature at a landscape scale.	The SSSI Citation for Aber Afon Dyfrdwy / The Dee Estuary does not list any pressures for the Site. As such it is considered adaptable to change.

Broad Ecosystem Type	Diversity	Extent	Conditions	Connectivity	Adaptability to Change
	horehound *Marrubium vulgare,* sandhill rustic moth *Luperina nickerhi gueneei* and grey seal *Halichoerus grypus.*				
Irreplaceable Habitat • Coastal Saltmarsh (t2a), part of the Dee Estuary / Aber Dyfrdwy SAC and SSSI; • Ancient Trees; and • Veteran Trees.	The small area of coastal saltmarsh within the Order limits have a low diversity of plant species and with more favourable areas of saltmarsh present across the wider landscape support a low number of protected and notable species. Three trees within the Order limits are classified as ancient or veteran trees. Whilst this number is low, relative to the number of trees at the site, they still provide	The area of saltmarsh within the Order limits is small (<650 m^2) but there is a significant land cover of this habitat across the wider landscape located within Aber Afon Dyfrdwy / The Dee Estuary.. Three trees within the Order limits are classified as ancient or veteran trees.	Saltmarsh forms part of the Aber Afon Dyfrdwy / The Dee Estuary and when considered as part of the wider habitat area it is in favourable condition. Ancient and veteran trees provide habitat niches for a range of species and improve the overall condition of the woodland habitat they are part of.	The area of saltmarsh within the Order limits is small (<650 m^2) and does not provide significant connectivity when considered alone. Connectivity across the wider landscape is assessed under designated sites. Coastal saltmarsh falls within the Marine Priority Ecological Network (DataMapWales, 2026) Ancient and veteran trees may improve connectivity for bird	Very Low adaptability to change – is sensitive to both direct and indirect impacts including air pollution, hydrological changes, shading / microclimate changes and noise, vibration and lighting.

Broad Ecosystem Type	Diversity	Extent	Conditions	Connectivity	Adaptability to Change
	a diversity of habitat niches for a range of protected and notable species.			and/or bat species as they could provide advantage point across the landscape.	
Urban: • Suburban mosaic of Developed and natural surface (u1d); • Sparsely vegetated urban land (u1f); • Artificial unvegetated, unsealed surface (u1c); • Developed land sealed surface (u1b); • Introduced shrub (u1) • Open Mosaic Habitat (OMH) on previously developed land (u1f3);	Urban habitats including hardstanding, buildings and unsealed surfaces. These are of low ecological value but provide structural diversity and nesting / roosting opportunities for birds and bats. OMH provides a diversity of habitats and support a diversity of invertebrate species.	Urban habitats cover the central portion of the Order limits and are present across the wider landscape. OMH covers a large proportion of the eastern section of the Order Limits (within the Construction and Indicative Enhancement Areas), its extent across the wider landscape is unknown but assumed to be present in small pockets.	The State of Natural Resources Report (SoNaRR) (NRW, 2025) Report focuses on green infrastructure and states: *"The overall condition of green infrastructure in urban ecosystems is Low to Medium."* Urban habitats present within the Order limits comprise hardstanding, buildings and unsealed surfaces and are of low ecological value. OMH provides suitable habitat for invertebrate species but in the absence of management will	Urban habitats are common across the wider landscape but provide negligible connectivity across the landscape for protected and notable species. OMH provides medium levels of connectivity as invertebrate species that it supports are typically of low mobility. Similar or complementary habitats are present surrounding the habitat which provide additional connectivity across the landscape.	Medium adaptability to change – most urban habitats are man made but some support sensitive priority species such as bats and birds. Can be sensitive to disturbance, noise, vibration and light pollution. OMH has low adaptability to change as in the absence of management the habitat will scrub over as a result of succession.

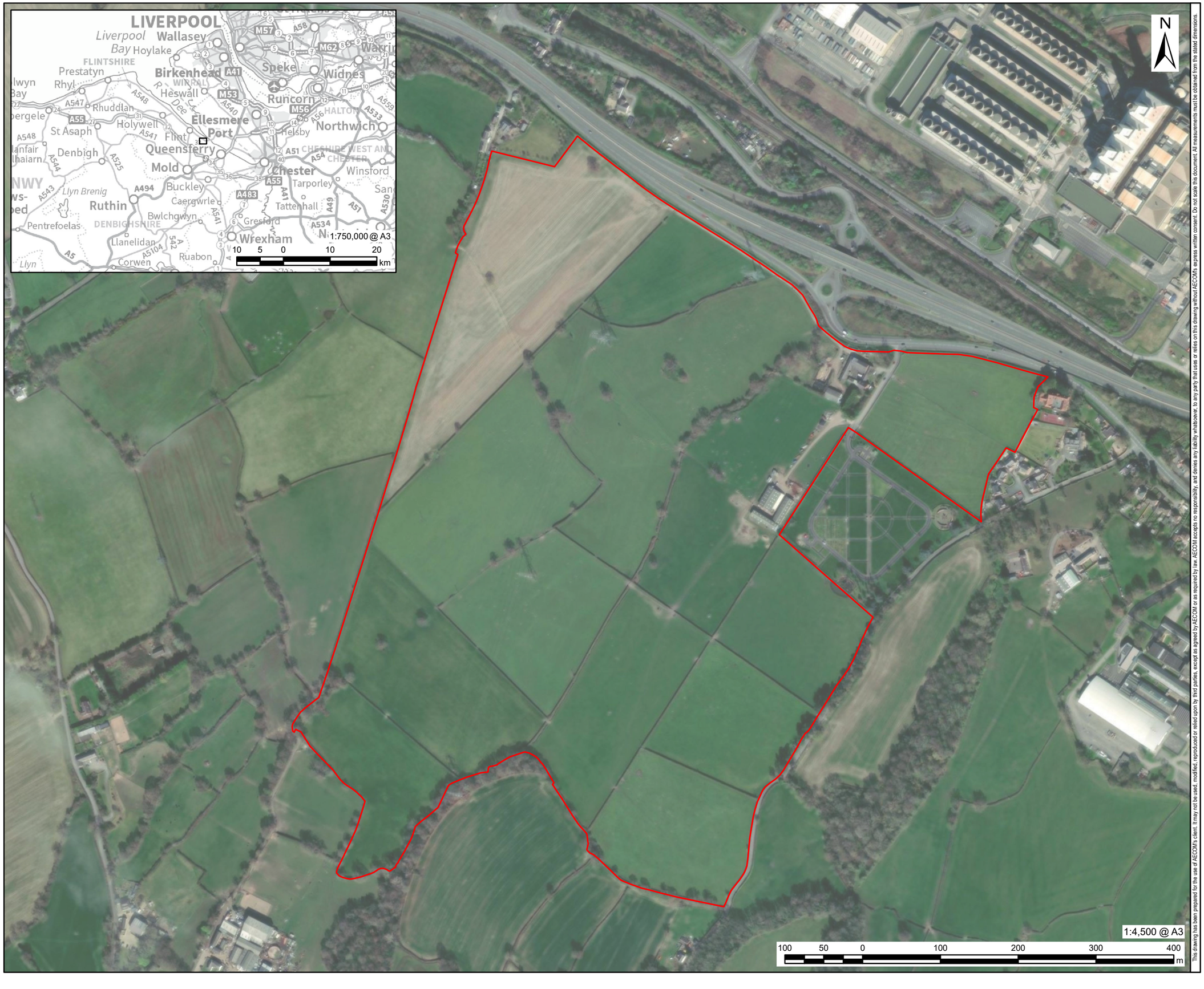
Broad Ecosystem Type	Diversity	Extent	Conditions	Connectivity	Adaptability to Change
• Buildings (u1b5);			become less suitable for invertebrate species due to succession.		
Semi-natural grassland: • Modified grassland (g4); • Other neutral grassland (g3c); • Bracken (g1c);	Grassland habitats within the Order Limits are generally characterised by medium species diversity, associated with areas of neutral grassland. Invasive non-native species are also present within the grassland habitats. While the overall, the range of grassland does not provide significant diversity within the Order limits but features within the grassland habitats such as scrapes and waterlogged areas provide additional habitat diversity.	Medium extent of semi-natural grassland within the Order limits with larger grassland areas present across the wider landscape.	Grassland habitats within the Order limits are not managed with a conservation focus and are predominantly uniform and regularly mown.	The SoNaRR Report states: *"Due to major historic losses in extent, lowland semi-natural grasslands are the least well connected of all ecosystems, with major implications for species which cannot move easily through the landscape. There is evidence of a recent increase in connectivity (Hudson J, 180 2023) but this starts from a baseline of very poor grassland connectivity and requires monitoring to see if the trend continues."*	Medium adaptability to change – can be managed appropriately to absorb impacts but are sensitive to nutrient enrichment and disturbance.

Broad Ecosystem Type	Diversity	Extent	Conditions	Connectivity	Adaptability to Change
				Grassland habitats within the Order limits provide additional habitat for species known to use the area and are listed on designated sites citations and qualifying features for Aber Afon Dyfrdwy / The Dee Estuary, such as Curlew.	
Freshwater: • Rivers and streams	Freshwater present within the Order limits comprises the Aber Afon Dyfrdwy / The Dee Estuary and is assessed under designated sites.				
Farmland / Arable: • Cereal Crops	A small area (0.28 ha) of cereal crops is present within the Order limits and is of low ecological value and has not been included within the DECCA baseline assessment.				
Woodland: • Other lowland mixed deciduous woodland (w1f7); • Other broadleaved woodland (w1g);	High diversity with a range of woodland types within the Order limits Woodland within the Order limits was found to be ecologically valuable for invertebrates, with suitability to support	Medium extent of woodland throughout the site – present but not dominant habitat type.	The SoNaRR Report (2025) has been used to assign habitat condition. The SoNaRR report states that most woodland stands across Wales are "*in intermediate condition*".	Woodland habitats provide good connectivity across the landscape for a range of protected and notable species. In addition, the SoNaRR Report states:	Medium adaptability to change – sensitive to both direct and indirect impacts. Single age stands of trees, and low species diversity may lead to increased risk of disease.

Broad Ecosystem Type	Diversity	Extent	Conditions	Connectivity	Adaptability to Change
	reptiles, amphibians, breeding birds, roosting and commuting / foraging bats.		Lack of management (and in some areas clearance of woody vegetation under overhead lines) within woodland habitats may lead to a decline in condition within the Order limits.	"*Historically there is a mixed picture trend for connectivity in woodlands over both the long term (1905-2024) and the short term (2019 to 2024). Historic loss of woodland in Wales has reduced connectivity of native woodland, and current connectivity is assessed as medium. In contrast, non-native stands are large blocks with good internal connectivity and current connectivity is assessed as high. (Forestry Commission, 2020).*"	

The DECCA Baseline overview uses the same assessment criteria as SoNaRR2025 to assess the components of DECCA assessment.

Appendix F - Alternative Off-site Delivery Areas



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AECOM uniper

PROJECT

Connah's Quay Low Carbon Power

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LEGEND

Site Boundary

NOTES

ISSUE PURPOSE

Green Infrastructure Statement

DATE

May 2026

PROJECT NUMBER

60768754

FIGURE TITLE

Land at Kelsterton Farm Location

FIGURE NUMBER

Figure 5

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- Site Boundary
- Area Not Included in the Site Boundary

NOTES

ISSUE PURPOSE

Green Infrastructure Statement

DATE

May 2026

PROJECT NUMBER

60768754

FIGURE TITLE

Land North of Weighbridge Road Location

FIGURE NUMBER

Figure 6

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Site Boundary

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FIGURE TITLE

Bagillt Fields Location

FIGURE NUMBER

Figure 7

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Site Boundary

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FIGURE TITLE

Gronant Fields Location

FIGURE NUMBER

Figure 8