Cyfoeth Naturiol Cymru
Natural Resources Wales

Ein cyf/Our ref: CAS-321140-Q1W2
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28/10/2026

Dear Sir/Madam,

Planning Act 2008 and The Infrastructure Planning (Examination Procedure) Rules 2010

Application by Uniper UK Limited ("the Applicant") for an Order granting Development Consent for the proposed Connah's Quay Low Power Project ("the Proposed Development")

Project Planning Inspectorate Reference: EN010166

Interested Party Reference Number: [redacted]

Re: Natural Resources Wales' Response to the Secretary of State's Request for Information

This letter comprises the following submission from NRW:

- NRW Responses to the Secretary of State's Request for Information – see Annex A

The comments provided in this submission comprise NRW's response as a Statutory Party under the Planning Act 2008 and Infrastructure Planning (Interested Parties) Regulations 2015 and as an 'interested party' under s102(1) of the Planning Act 2008. In addition to being an interested party under the Planning Act 2008, NRW exercises functions under legislation as detailed in the cover letter of NRW's Deadline 1 Written Representations [REP1-073].

We have reviewed the Secretary of State's Request for Information, dated 08/10/26, and have provided our responses to the requests directed to NRW in Annex A of this letter.
Our comments are provided without prejudice to any further comments we may wish or be required to make in respect of this application.

Please do not hesitate to contact me at northeastplanning@cyfoethnaturiolcymru.gov.uk should you require further advice or information regarding this submission.

Yours faithfully,

[redacted]
Cynghorydd Arbenigol Arweiniol - Cynllunio Datblygu / Lead Specialist Advisor - Development Planning
Cyfoeth Naturiol Cymru / Natural Resources Wales

[CONTINUED]

ANNEX A – NRW RESPONSES TO THE SECRETARY OF STATE'S REQUEST FOR INFORMATION

Secretary of State's question/request	Natural Resources Wales' response
Habitats Regulations Assessment	
Conclusions on Likely Significant Effects (LSE)	
6. The Secretary of State requests that Natural Resources Wales ("NRW") provides its views on the potential for noise disturbance from barge movements to affect the Dee Estuary SPA and Ramsar site in response to the Applicant's submission REP7-037.	We have reviewed the Applicant's submission REP7-037 (Section 2.1, Table 1, Ref. A.1.3). Our views on this matter are as follows. To support a conclusion of no adverse effect on site integrity for the Dee Estuary SPA and Ramsar site features from visual and noise disturbance from barge movements (and the associated loading and unloading of goods at port), we advise that the following further information should be provided: 1. Size of the barges/vessels that are planned for use. Vessels of different sizes can have varying disturbance effects on waders and wildfowl, with physical size, noise, speed, manoeuvres and wash changing depending on vessel size and type. 2. Current usage level of the ports selected. The applicant has stated that supply deliveries will be split across three ports: the Port of Mostyn, Connah's Quay North, and Ellesmere Port. The applicant has stated that Connah's Quay North is an existing commercial offloading facility, and Ellesmere Port is an operational port. The applicant has already demonstrated that the Port of Mostyn is a well-established and regularly utilised port. Therefore, the additional vessels required by the applicant may not cause a significant difference in current disturbance levels at this site. However, we advise that information on the number and type of vessels that currently use the proposed ports should be provided, along with clarification of the percentage of deliveries to each of the three ports from the anticipated 30 two-way vessel movements. As Ellesmere Port is located on the Mersey estuary, England we would defer to Natural England for advice regarding potential impacts of noise disturbance from barge movements on the bird features of the Mersey Estuary designated sites. 3. An understanding of the activities associated with the barges being at port is important to assess potential disturbance effects. The applicant has stated that "Movements would be intermittent, short-term, and constrained by tidal windows." With the barge expected to be present at port for a few days, we advise that confirmation is sought on whether delivery will occur during high tide and information provided on what activities would occur while

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	the barge remains docked. The greatest visual disturbance during barge use is likely to be caused by human presence and work on the foreshore (ABP Marine Environmental Research Ltd 2014). 4. The proposed vessel routes for bringing goods into the Dee estuary through Liverpool Bay SPA have not been confirmed. Common scoter and red-throated diver are features of Liverpool Bay SPA and both are disturbed by boat traffic. Therefore, if the planned vessel routes to the ports would differ from established vessel routes through the Liverpool Bay SPA, further information on the planned vessel routes should be provided and assessed. 5. Deliveries being loaded and unloaded at Connah's Quay North jetty and driven to the development site will pass Shotton Lagoons and Reedbeds Site of Special Scientific Interest (SSSI). Therefore, there is the potential for increased vehicle traffic near the SSSI, which contains a common tern breeding colony that is part of the Dee Estuary SPA and could be susceptible to disturbance. Further information should therefore be provided on the vehicle movements generated by the use of Connah's Quay North jetty, including the number and type of vehicles and the timing of their movements.
7. The Secretary of State requests that NRW provides its views on how these barge movements could impact benthic habitats in the River Dee and Bala Lake Special Area of Conservation ("SAC") in response to the Applicant's submission REP7 037.	We note that the Applicant has provided additional information regarding vessel movements and has presented feature-specific justification supporting its conclusion that vessel operations would not result in adverse effects on the qualifying features of the River Dee and Bala Lake SAC. While uncertainty remains regarding the scale and recovery of seabed disturbance associated with vessel movements, we accept the risk is low given the anticipated number of vessels and the temporary and localised extent of the vessel operations. We therefore concur with the conclusion of no adverse effect on site integrity of the River Dee and Bala Lake SAC. However, as this conclusion is based on the number of vessel movements stated by the applicant, we advise that the DCO should secure the number of vessel movements to the number stated in the application or below and require further consultation and approval from NRW should the number increase.
8. The Secretary of State requests that the Applicant provides an updated in combination assessment to include the additional projects of the Knauf Mineral Rock Wool Facility and the Arrow Bio Water Recycling Facility. This should address points raised by NE [REP7-	We note that this point is directed to the Applicant. However, we wish to confirm that following completion of updated modelling, the Applicant engaged NRW with the findings of their updated draft air quality in-combination effects assessment report (AECOM, September 2026). We have confirmed to the Applicant that the report satisfactorily addresses our advice regarding the inclusion of the additional projects in the air quality in-combination effects assessment. Therefore, in terms of the DCO application, we consider this matter to be resolved.

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041] and NRW [REP7-042] related to this matter.	
Impacts on Atlantic salt meadow	
11. The Secretary of State invites NRW and Flintshire County Council ("FCC") to provide any final comments on the latest outline Saltmarsh Implementation and Monitoring Plan ("oSIMP") [REP7-023] including on the potential for the proposed measures to compensate for the impacts of habitat loss on Atlantic salt meadow and any suggested amendments.	We are broadly satisfied in principle that the proposed outline saltmarsh creation measures could compensate for the loss of Atlantic salt meadow habitat. However, there remain practical and evidential uncertainties relating to ground conditions, contamination, implementation, and ecological establishment. These matters will require further work and can only be resolved through the mechanisms secured by the DCO. We have reviewed the latest Outline Saltmarsh Implementation and Monitoring Plan (oSIMP) [REP7-023]. Whilst we are largely satisfied with this, our remaining comments are as follows: • Para. 2.1.1: this only refers to the permanent loss of saltmarsh and not the 650m² of temporary loss referred to elsewhere in the oSIMP. Based on the statement that the oSIMP would not be required if an alternative drainage strategy is adopted, confirmation should be included that any alternative works would not result in the temporary loss of Atlantic salt meadow habitat. • Section 3.2 should include details of the elevations within the tidal frame for the proposed saltmarsh creation area, as we understand that groundworks will be required to render the site suitable for tidal inundation. • Para. 8.1.4: the oSIMP refers to trigger thresholds for adaptive management but does not identify these. The draft DCO has secured the requirement to define trigger levels. We therefore advise that the oSIMP amends the Saltmarsh Steering Group's role to include agreeing and identifying trigger levels for requiring corrective action, in accordance with the draft DCO. • Steering Group costs: The oSIMP does not appear to address recovery of costs incurred by relevant parties participating in the Saltmarsh Steering Group. • Tidal current velocity data: This matter has been addressed through the commitment in para. 6.3.2 to install an additional gauge within Creek 1. We consider this matter closed. • We note the Applicant's ongoing position that these proposals involve mitigation and reiterate our previous advice regarding this matter [REP5-069, Annex F]. We are content with the other amendments made to the document [REP7-023].

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13. The Secretary of State requests the Applicant, NRW and NE provide their views on proposed drafting for Part 2 to Schedule 16 of the draft Development Consent Order ("DCO") (provided at Annex A below) including in respect of steering group membership, the content and discharge of the oSIMP, the maintenance period of the compensation measure, and the monitoring and reporting process.	We acknowledge that the oSIMP and draft DCO would secure the establishment of a Saltmarsh Steering Group and require participation by NRW and the local planning authority, but neither document contains any mechanism for the recovery of costs incurred by those bodies. We therefore advise that both documents are amended to secure cost recovery arrangements for NRW and the local planning authority. Notwithstanding the above, we are otherwise satisfied with the proposed drafting for Part 2 to Schedule 16 of the draft DCO but advise the following minor typographical issues should be corrected in the final version: • Part 1, Section 1, definition of "outline SIMP": please correct the "Error! Reference source not found" notification after "article." • Part 1, Section 3, para. 1: please insert "the" between "with relevant". • Part 1, Section 3, para. 3: please insert "the" between "with relevant".
15. The Secretary of State notes NRW's advice [REP4-091] that the Applicant has made no changes to the predicted area of affected Atlantic salt meadow following the proposed change to stack heights that will lead to a reduction in the individual and in-combination nitrogen deposition process contribution from the proposed development. NRW is requested to confirm it is content with this approach.	Our high-level air quality review at the time identified that, despite the predicted impact of the project alone reducing, the predicted area of Atlantic salt meadow affected did not. The Applicant has since confirmed that the presented area of 245 ha was not correct and has clarified that the predicted area of Atlantic salt meadow affected greater than 1% of the nitrogen deposition critical load has reduced to 53.8 ha. Following the recent inclusion of four additional projects, the Applicant has confirmed that the area predicted to receive greater than 1% of the nitrogen deposition critical load due to in-combination effects has increased from 445 ha to 2389 ha. We will review the predicted concentrations and predicted areas affected whilst undertaking the detailed air quality review as part of our determination of the Environmental Permitting Regulations permit application.
16. The Secretary of State requests NRW and FCC to provide their final positions on the Saltmarsh Management Contribution and Nitrogen Management Plan including on the potential for the proposed measures to compensate for the impacts of increased	We have not received final details of the Saltmarsh Management Contribution or Nitrogen Management Plan and are therefore unable to provide a final position on these. However, we understand that both would be secured via the DCO, and we would therefore wish to be consulted on these prior to their approval.

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nitrogen deposition on Atlantic salt meadow, the suitability of proposed monitoring arrangements and any recommended amendments.	The Applicant has recently confirmed to us during engagement on their updated air quality in-combination effects assessment that the updated modelling associated with the change application submitted at Deadline 3 of the Examination identified a reduction in the area of saltmarsh predicted to be affected by nitrogen deposition above 1% of the critical load of 10KgN/Ha/Yr from the project alone from 245 ha to 53.8 ha. We acknowledge the reduction is a betterment on the previous figure, but our overall position remains that there could be a significant adverse effect on the Annex I Atlantic Salt Meadow feature of the Dee Estuary SAC from nitrogen deposition associated with the project. We have recently provided further advice to the Applicant following engagement from them on their updated saltmarsh management contribution and 'skeleton' Nitrogen Management Plan (NMP) (via email to AECOM, dated 25/09/26). This included advice on potential locations, management measures, and monitoring arrangements. We have identified an area of saltmarsh owned by Flintshire County Council that would benefit from management and have brought this to the Applicant's attention. We have advised the Applicant that the proposed measures should primarily focus on mowing of invasive nitrophilous grasses which smother smaller, less robust plant species and scarification to allow seeding-in of more diverse plants. We have also queried with the Applicant (via email to AECOM dated 16/10/26) the updated approach to calculating the saltmarsh management contribution due to an apparent overlap between the air quality modelling contours applied. We have also advised that flexibility for the total annual payment amounts should be considered as there may be higher value requirements in some years and lower in others. It should be ensured that the financial contribution is able to accommodate any inflation that occurs over its lifetime. Whatever the final sum, it should be ensured that the financial contribution towards saltmarsh management is realistic to achieve the associated management actions within the extent of the areas to be managed, as to be confirmed in the Nitrogen Management Plan.

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	We advise that a steering group is established (and secured within the DCO) to ensure effective delivery of the proposed saltmarsh management measures and Nitrogen Management Plan. We would wish to be included as a member of the steering group. Please note that further commentary on this matter may be provided as part of our review of the Environmental Permit application, which is currently ongoing.
Impacts to Functionally Linked Land ("FLL")	
20. NRW is requested to provide its final position on this matter and confirm if the baseline ornithology data is now adequacy for it to rule out functional linkage between the main development area and the Dee Estuary SPA and Ramsar site for all features except Curlew. NRW should provide its final conclusions regarding adverse effects on the integrity of the Dee Estuary SPA and Ramsar site.	Our standard advice is for two full years of baseline ornithology surveys using the same data collection method for all surveys undertaken in those two years. Site-specific surveys should include surveys during the high tide periods (i.e. two hours either side of high tide). Data should be presented for all surveys in a clear and concise manner. Although the baseline ornithology data collection and presentation were not fully of the standard that we would normally expect, we have accepted that the data presented in this particular case is adequate as the Applicant has provided two years' worth of baseline data from within the Order limits. Our final conclusions regarding adverse effects on the integrity of the Dee Estuary SPA and Ramsar site are as follows: **Noise and visual disturbance** We advise that an adverse effect on site integrity can be ruled out for noise and visual disturbance from the project alone. For noise disturbance, with appropriate mitigation measures, including acoustic fencing, jackets, acoustic covers, and shrouds, noise levels within the Dee Estuary SPA are predicted to be 50-55dB with a small area close to the order limits reaching 55-60dB. We advise use of the Waterbird Disturbance Mitigation Toolkit (Cutts et al 2013), which states low level noise effects being noise of less than 55dB at the bird, or noise between 55-72dB in some highly disturbed areas such as industrial, urban and adjacent to roads. The area close to the order limits where noise will be 55-60dB is industrial and adjacent to the A548 and therefore can be classed as a highly disturbed area. For visual disturbance, with appropriate mitigation measures including the use of the acoustic screen, which will also screen human activity, and the existing 2 m high bund, an adverse effect on site integrity can be ruled out.

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	Functionally linked land displacement We advise that an adverse effect on site integrity cannot be ruled out for Loss of Functionally Linked Land from the project alone for the curlew feature of the Dee Estuary SPA. Data presented by the applicant shows regular use of land within the order limits by significant (>1% of the SPA population) numbers of curlew. We note the measures proposed by the Applicant to compensate for the loss of functionally linked land for curlew, by acquiring land at the Gronant Fields site. We are suitably assured, in principle, that management of that land can be successful in achieving its aims, with an emphasis upon concentrated management for over-wintering curlew in a dedicated area equating to approximately 26 hectares (ha) of the land parcel, as set out in principle in the oCIMP, subject to further details being provided and the land managed effectively as secured by the DCO. **Disturbance from increased barge movements** Before we can agree whether an adverse effect on site integrity can be ruled out for noise and visual disturbance from increased barge movements, further information should be provided. Please see our response to question 6 regarding this.
25. The Secretary of State requests that NRW, NE and FCC provide their final views on the proposed compensation measures at Gronant Fields, including on the potential for the proposed measure to compensate for impacts to curlew from the loss of FLL, whether the proposals conflict with other conservation objectives at the site and whether NRW it is satisfied with the updated definition of 'in perpetuity' in the updated oCIMP [REP7-021].	We are broadly satisfied in principle that the proposed outline compensation measures at Gronant Fields could compensate for impacts to curlew from the loss of FLL. However, there remain practical and evidential uncertainties relating to ground conditions, implementation, and ecological establishment. These matters will require further work and can only be resolved through the mechanisms secured by the DCO. It will be important to understand the current water table level (hydrology) at the Gronant Fields site (we are aware that the applicant is currently gathering data for this) and the invertebrate abundance within the soils. We welcome that these aspects have both been included in the proposed wording for Part 1 to Schedule 16 of the DCO. These data will allow an understanding of the current available food source at the site, which is an important metric when considering the carrying capacity of the site and its suitability for foraging curlew. We also maintain our advice that the soil properties should be characterised. Soil samples for invertebrate studies should include sampling the topsoil layer (at least 10cm depth) where curlew will feed. We advise that at least 25 individual cores should be taken and

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	bulked together to give a single soil sample for analysis. We advise that these should be located adjacent to the groundwater dip well monitoring points that we understand are being placed by the Applicant within the Gronant Fields site. Muck-spreading should be avoided since it may be contaminated with chemicals used to treat livestock for parasites; this can accumulate in the soil, reducing invertebrate biodiversity and abundance. As Gronant Fields is located within the Dee Estuary SPA and Ramsar site, the remaining land outside of the 26ha core curlew management area should be managed in consideration of the conservation objectives of the other named features of the SPA, Ramsar site and SSSI. In addition to curlew, SPA features currently using the Gronant Fields site include oystercatcher, and black-tailed godwit, as well as lapwing which are a feature of the site assemblage. As the oCIMP includes both primary curlew habitat management (where scrapes and ditches will keep the ground wet) and secondary habitat which will have its vegetation and sward height maintained through grazing, but otherwise be unchanged, current species features utilising the fields should not be displaced as the management would be expected to enhance the suitability of the site for them. Our specific comments on the latest oCIMP [REP7-021] are as follows: • Para. 1.1.1: we welcome the reference that the oCIMP also considers other qualifying bird species of the Dee Estuary SPA / Ramsar site, where appropriate. • Para. 1.1.2: the oCIMP should focus on providing supporting habitat from at least September, instead of October. • Para. 1.1.3 & 2.2.3: the proposed draft wording for Part 1 to Schedule 16 of the draft DCO states that no stage of Work No. 1 or any site clearance works required in connection with Work No. 1 may commence until the CIMP has been submitted to and approved in writing by the Secretary of State, in consultation with the relevant statutory nature conservation body and the relevant local planning authority for the area in which the compensation measure is to be delivered. We advise that the oCIMP should be updated to reference this in addition to the fulfilment of Phase 1 prior to any displacement of curlew occurring. • Para. 1.1.4 & 2.2.2: these should acknowledge that the 21.56ha of 'non-core' curlew management land is already designated as a SPA and Ramsar site for other species. Outside of the core curlew management areas, the focus should be on targeted habitat improvements for those other species, which will have slightly different habitat

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	preferences, rather than primarily for Net Benefit for Biodiversity (NBB), which should in any case be sympathetic to the site features. • Para. 6.1.5: we advise that this should include reference to a 'mean' sward height of no more than 10cm, to allow for greater habitat complexity within the sward. • Para. 6.2.12: as we are not aware that a soil analysis has been conducted at the site yet, we advise that reference to the domination of heavy clay soils should be evidenced or amended. We have previously advised that there is peat on site, which will need to be considered. • Para. 7.1.1: it is not clear why data will only be collected for the first ten years after habitat creation, or what evidence this is based on. We advise that data should be collected over the lifetime of the project. The monthly survey visits should be timed to match the British Trust for Ornithology's WeBS survey dates and methods and be shared with the BTO's WeBS project accordingly. • Para. 8.1.2: we note reference to Flintshire County Council being on the Curlew Steering Group. Please note that the Gronant Fields site is located within the Denbighshire County boundary. <u>Appendix C: Gronant Fields Environmental Appraisal</u> • Para. 1.3.2: we note that a Habitats Regulations Assessment will be needed for the CIMP at the Gronant Fields site. • Para. 2.2.1: we welcome reference to delivering wider ecological benefits for the qualifying features of the Dee Estuary SPA, Ramsar site and SSSI site. • Para. 7.1.4: we maintain our advice that a Section 16 Land Management Agreement could be established to regularise the CIMP activities. We note that, if the Gronant Fields site falls outside the DCO limits, the works will require Wildlife and Countryside Act Section 28 permission from NRW. However, as there will likely be iterative management works over the life of the project, which may require repeated section 28 permissions, we consider that a broader scale Section 16 land management plan, containing a sufficient degree of flexibility, could allow the works associated with the final CIMP to be consented, without the likely need for further changes/S28 applications in the future.

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	Definition of "in perpetuity": Following further discussion with the Applicant regarding this they have amended their definition of "in perpetuity" but we sought further clarification of the term 'suitability' within this. We agreed that they would provide a footnote for this, as follows: *Under this strategy the land would be managed until the Proposed Development is decommissioned and the 26 ha of functionally linked land within the Order limits is reinstated to its existing or a materially similar condition that is suitable[1] to function as functionally linked land for curlew, unless otherwise agreed with the relevant discharging authority in consultation with NRW* *[1] neutral type grassland with regular sheep grazing to maintain sward height* However, while paragraph 2.2.14 of the latest oCIMP includes the updated definition quoted above, it does not include the associated footnote to define "suitability." We therefore advise that this should be included in order for us to be satisfied with the amended definition.
26. The Secretary of State requests the Applicant, NRW and NE provide their views on proposed drafting for Part 1 to Schedule 16 of the draft DCO (provided at Annex B below).	Our comments on the proposed draft wording for Part 1 to Schedule 16 of the draft DCO are as follows: • Part 1: The Dee Estuary Site of Special Scientific Interest (SSSI) is not referenced with the SPA and Ramsar site. We therefore query whether this should also be included. • Part 1, Section 1, definition of "outline CIMP": please correct the "Error! Reference source not found" notification after "article." • Part 1, Section 3, para. 2(f)(ii): we advise that the list of survey programmes should also include reference to "soil properties". We acknowledge that the oCIMP and DCO would secure the establishment of a Curlew Steering Group and require participation by NRW and the local planning authority, but neither document contains any mechanism for the recovery of costs incurred by those bodies. We therefore advise that both documents are amended to secure this provision. Notwithstanding the above, we are otherwise satisfied with the proposed drafting for Part 1 to Schedule 16 of the draft DCO.

Secretary of State's question/request	Natural Resources Wales' response
Additional matters	
33. The Secretary of State requests that NRW provides its views on the Applicant's final approach [CR1-020, CR1-118, REP4-017, and REP6-025] to determining both HRA and Environmental Impact Assessment impacts from atmospheric pollution, including greenhouse gases, following Change Request 4 to reduce stack heights.	As set out in our response to Question 15 above, we note the recent clarification from the Applicant resulting in changes to the area of Atlantic salt meadow predicted to receive greater than 1% of the nitrogen deposition critical load, both from the proposal alone and in-combination. Based on our high-level review we are content with the assessment approach taken by the Applicant in relation to assessment of atmospheric air pollution. A detailed air quality assessment will form part of our ongoing determination of the Environmental Permitting Regulations permit application.
Environment Impact Assessment	
Net Benefit for Biodiversity ("NBB")	
38. The Applicant, FCC and NRW are requested to provide their final positions on the NBB provision including on any potential conflicts with the 'without prejudice' compensation proposals at Gronant Fields and other habitat creation/biodiversity requirements.	Paragraph 2.2.2 of the latest oCIMP states: *The core area for the primary measure set out within this Plan to offset the loss of FLL is the provision of 26 ha of wet grassland within the Gronant Fields site. The remainder of the Gronant Fields site would be managed in accordance with the Off-site Net Benefit for Biodiversity and Green Infrastructure Strategy (EN010166/APP/6.14), providing a further 2.29 ha of wet grassland alongside 21.56 ha of existing other neutral grassland (to be enhanced to species rich grassland). Whilst not required for offsetting the loss of FLL within the Order limits, similar management of sward height and taller vegetation encroachment in these secondary areas would provide additional habitat enhancements for Curlew, as well as other SPA bird species. These secondary areas are shown on Figure A-3 and their management is described within the Off-site Net Benefit for Biodiversity and Green Infrastructure Strategy (EN010166/APP/6.14) and is secured by Requirement 18 of the Draft DCO (EN010166/APP/3.1).* While we are satisfied with the proposed approach to NBB in relation to the interface between the Outline Curlew Implementation Plan (EN010166/APP/6.13) and the off-site Net Benefit for Biodiversity and Green Infrastructure Strategy (EN010166/APP/6.14), we are concerned that the above statement implies that the remainder of the land to be managed at Gronant Fields will be for NBB and that will assist other SPA/Ramsar species.

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	We advise that it should be the other way around and that the remainder of the land should be specifically managed for all SPA/Ramsar species, with this assisting the achievement of NBB. On nearby areas, the creation of shallow scrapes to attract a range of SPA/Ramsar features has been successful. We consider that NBB targets could be incorporated at Gronant Fields but only when other potential habitat considerations have been explored to improve the status of SPA/Ramsar site features. We therefore wish to reiterate the importance of ensuring that the NBB measures should be compatible with the objectives of the conservation management measures for the SPA, Ramsar site and SSSI, and do not duplicate those objectives. Regarding the NBB measures, we advise liaison between the Applicant, Denbighshire, and Flintshire County Councils to ensure that all parties are in agreement.