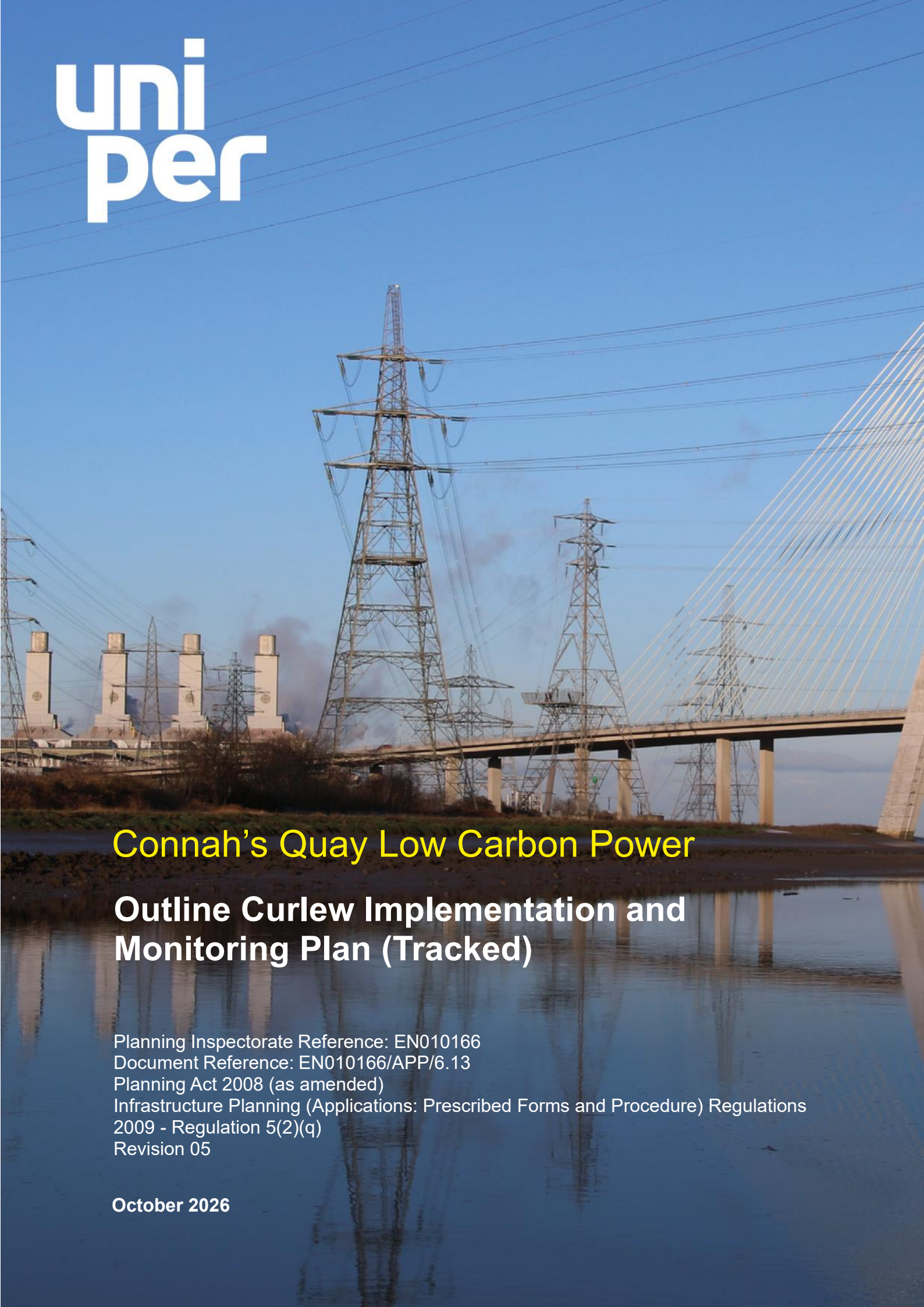


Connah's Quay Low Carbon Power

Outline Curlew Implementation and Monitoring Plan (Tracked)

Planning Inspectorate Reference: EN010166
Document Reference: EN010166/APP/6.13
Planning Act 2008 (as amended)
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Prepared for:
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1. Introduction

1.1 Overview

1.1.1 This Outline Curlew Implementation and Monitoring Plan (hereafter referred to as the Plan) provides details of the offsetting measures for Curlew (*Numenius arquata*) associated with the Dee Estuary / Aber Dyfrdwy Special Protection Area (SPA) / Ramsar site. These measures are required to offset for the loss of Functionally Linked Land[1] (FLL) used by Curlew within the Order limits (and more specifically the Main Development Area). Where appropriate, the Plan also considers other qualifying bird species of the Dee Estuary / Aber Dyfrdwy SPA / Ramsar site.

1.1.2 The Plan outlines a two phase approach for the offsetting measures to be delivered within a 26 ha area of Gronant Fields (the offsetting area) as follows:

- Phase 1 – implementation of a suitable grazing/mowing regime to maintain an optimal sward height and required levels of ground disturbance to provide suitable foraging conditions and access to the existing soil invertebrate resource; and
- Phase 2 – further enhancement of the 26 ha of wet grassland to provide additional foraging (and roosting) opportunities for Curlew throughout the late autumn, winter and early spring period (October to March) by providing conditions that would support higher densities of Curlew invertebrate prey. The requirement for enhancement will be determined by ongoing environmental monitoring.

1.1.3 Fulfilling Phase 1 (i.e. a maintained optimal sward height) would ensure that the mitigation provision is available prior to any displacement of Curlew occurring.

1.1.4 In addition, whilst not required for the purposes of offsetting the loss of FLL, a further 21.56 ha of existing grassland at the Gronant Fields site will be managed sympathetically for Curlew in accordance with management of the offsetting area and 2.29 ha of existing arable will be converted to wet grassland.

1.2 Structure of the Plan

1.2.1 This Plan provides details of the location of an area of land out with the Order limits where a series of habitat creation and enhancements and management actions designed to provide optimal foraging and roosting habitat for Curlew will be provided. The remainder of the Plan is structured as follows:

[1] Functionally Linked Land (FLL) is a term often used to describe areas of land or sea occurring outside a designated site which is critical to, or necessary for, the ecological or behavioural functions in a relevant season of a qualifying feature for which a Special Areas of Conservation (SAC), Special Protection Area (SPA) or Ramsar site has been designated. These habitats are frequently used by qualifying species and support the functionality and integrity of the designated sites for these features.

- Section 2 sets out:
  - the aims and objectives of the Plan;
  - provides details of the replacement Curlew habitats that need to be delivered; and
  - details how the proposed measures would provide optimal conditions;
- Section 3 sets out:
  - the location and context of the Proposed Development; and
  - the baseline ornithology surveys of the Main Development Area demonstrating it comprises FLL.
- Section 4 sets out:
  - the site selection process, including the selection criteria and consideration given to alternative sites; and
  - details on why the sites are ecologically suitable for the proposed mitigation.
- Section 5 sets out:
  - the existing management and habitats present within the Gronant Fields; and
  - a summary of baseline ornithology surveys and supporting historic bird records for Gronant Fields.
- Section 6 sets out:
  - an overview of the phased approach proposed at Gronant Fields;
  - indicative timescales for the implementation of Phase 1 which would ensure no net loss in foraging habitat for Curlew associated with the Dee Estuary / Aber Dyfrdwy SPA / Ramsar site; and
  - details of enhancement opportunities that would comprise Phase 2 (water management measures) which could be implemented if determined as necessary ~~by the Curlew Steering Group~~; and
  - details of environmental controls that would be followed during each phase, including those relating to biosecurity and access.
- Section 7 sets out:
  - Management and maintenance activities;
  - Post implementation monitoring; and
  - Details of the success criteria, including thresholds for determining success and the trigger thresholds for adaptive management measures.
- Section 8 sets out:
  - further details on the membership of the Curlew Steering Group.
- Appendix A provide:
  - Supporting Figures
- Appendix B summarises:

  - Peak Counts and Records from Gronant Fields for the last 5 years.

- Appendix C demonstrates:
  - how Gronant Fields would be accessed during the implementation of the Plan;
  - that the **Environmental Statement (EN010166/APP/6.1-6.4)** and **Report to Inform Habitats Regulations Assessment (EN010166/APP/6.13)** appropriately assess these works and demonstrate that no new or materially different likely significant environmental effects arise as a result of the Off-Site Mitigation Works; and
  - Identifies any consents, permits and licenses required to implement the Plan.

1.2.2 This document should be read in conjunction with the **Report to Inform Habitats Regulations Assessment** (**EN010166/APP/6.12**), **Green Infrastructure Statement** (**EN010166/APP/6.11**), **Off-site Net Benefit for Biodiversity and Green Infrastructure Strategy** (**EN010166/APP/6.14**) and **Chapter 11: Terrestrial and Aquatic Ecology** (**EN010166/APP/6.2.11**) of the Environmental Statement (ES) Volume II.

1.2.3 The measures set out in this document are secured by Part 1 of Schedule 16 of the **Draft Development Consent Order** (**DCO**) (**EN010166/APP/3.1**). Part 1 of Schedule 16 identifies that a Curlew Implementation and Monitoring Plan must be developed in general accordance with this Plan and prescribes the details that the Curlew Implementation and Monitoring Plan must contain.

1.3 The Proposed Development

1.3.1 Uniper UK Limited (the Applicant) is seeking a DCO for the construction, operation (including maintenance) and decommissioning of a proposed low carbon Combined Cycle Gas Turbine (CCGT) Generating Station fitted with Carbon Capture Plant (CCP) (the Connah's Quay Low Carbon Power (CQLCP) Abated Generating Station) and supporting infrastructure (collectively the Proposed Development).

1.3.2 The CQLCP Abated Generating Station would comprise up to two CCGT with CCP units (and supporting infrastructure) achieving a net electrical output capacity of more than 350 megawatts (MW; referred to as MWe for electrical output) and up to a likely maximum of 1,380 MWe (with CCP operational) onto the national electricity transmission network.

1.3.3 Through a carbon dioxide (CO_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 would be permanently stored in depleted offshore gas reservoirs in Liverpool Bay.

1.3.4 For the purposes of the electrical connection, National Grid Electricity Transmission plc (NGET), which builds and maintains the electricity

transmission networks, is responsible for the operation and maintenance of the existing 400 kV NGET Substation.

1.3.5 A description of the Proposed Development, including details of maximum parameters, is set out in **Chapter 4: The Proposed Development** (**EN010166/APP/6.2.4**) of **ES Volume II**. At this stage in the development, the design of the Proposed Development incorporates a necessary degree of flexibility to allow for ongoing design development.

1.4 Legislative Context

1.4.1 As part of the assessment of a development, it is necessary to consider whether the development is likely to have a significant effect on areas that have been internationally designated for nature conservation purposes (i.e., European Sites). European sites are protected under the Conservation of Habitats and Species Regulations 2017 (Habitats Regulations). The United Kingdom (UK) left the European Union (EU) on 31 January 2020 under the terms set out in the European Union (Withdrawal Agreement) Act 2020 (the Withdrawal Act).

1.4.2 However, the most recent amendments to the Habitats Regulations – the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 (2019 Regulations) – make it clear that the need for Habitats Regulations Assessment (HRA) continues to apply. Whilst those 2019 Regulations make changes to the Habitats regime and terminology; much of the impact of those changes does not yet have a practical effect, particularly the introduction of the term 'national site network', given the short passage of time since the end of the transition period. As such, this document continues to use the term 'European sites' to refer to all Natura 2000 sites potentially affected by the Proposed Development.

1.4.3 A detailed **Report to Inform Habitats Regulations Assessment** (**EN010166/APP/6.12**) has been undertaken and is included as part of the DCO submission.

1.4.4 Section 7 of **Appendix C** provides details of the additional consents, licences and approvals that may be required to implement the measures set out within this Plan.

2. Aims and Objectives

2.1 Need

2.1.1 As detailed in the **Report to Inform Habitats Regulations Assessment** (**EN010166/APP/6.12**) and **Appendix 11-D: Ornithology Technical Appendix (EN010166/APP/6.4),** Curlew have been regularly recorded utilising terrestrial areas of the Order limits for foraging and roosting. As such, these areas were deemed to be functionally linked to the Dee Estuary / Aber Dyfrdwy SPA / Ramsar site. Offsetting measures are required for the loss of 26 ha of FLL used by Curlew within the Order limits (and more specifically the Main Development Area).

2.2 Objectives

2.2.1 The objectives of the habitat creation and enhancement work within the offsetting area for the SPA / Ramsar site Curlew wintering population is to:

- provide an optimal Curlew foraging resource; and
- support an increased number of Curlew equivalent to that displaced from the FLL within the Order limits.

2.2.2 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)**.

2.2.3 The delivery of the offsetting areas and specific measures will be provided in phases, with only the first phase enacted prior to commencement of Work No. 1. These phases are outlined further in Section 6.2.

3. Baseline

3.1 Overview

3.1.1 This section provides the context for the requirements of the offsetting measures. It includes an overview of the location of the relevant components of the Proposed Development and provides baseline information in relation to the relevant designated sites and the bird populations recorded within and adjacent to the Order limits.

3.2 Location and Context

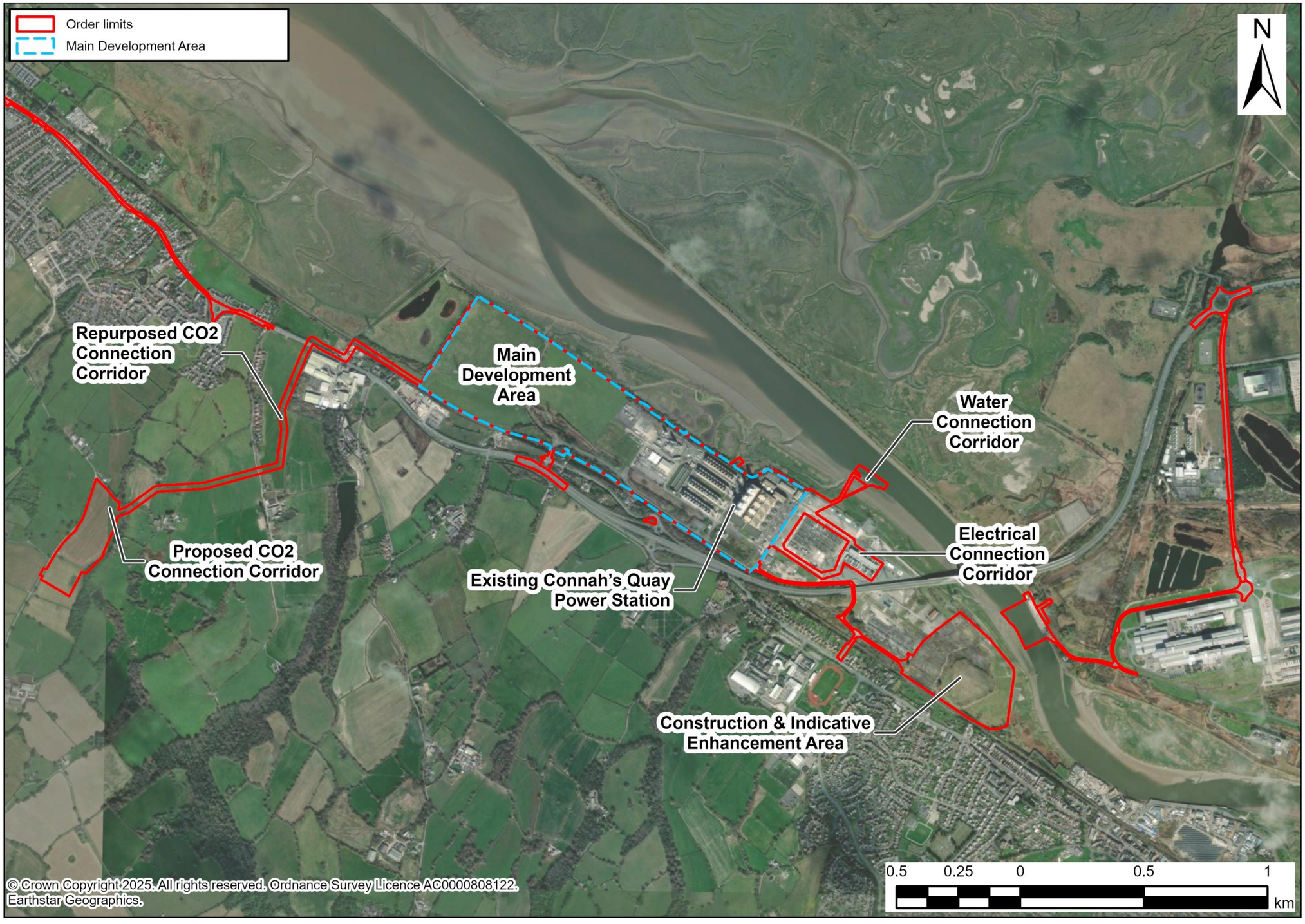
Location of the Proposed Development

3.2.1 The Order limits are located within Flintshire, Wales. **Figure 3-3: Areas identified in the ES** (**EN010166/APP/6.3**) provides an overview of the different components of the Proposed Development, within the Order limits, which are referenced throughout the Application. These comprise:

- The Construction and Operation Area:
  - Main Development Area;
  - Construction and Indicative Enhancement Area (C&IEA);
  - Water Connection Corridor;
  - Surface Water Outfall Area;
  - Proposed CO_2 Connection Corridor;
  - Repurposed CO_2 Connection Corridor;
  - Electrical Connection Corridor;
  - Access to the Main Development Area; and
  - Hardstanding Expansion at Connah's Quay North Jetty.
- The Accommodation Work Areas.

3.2.2 The area of relevance to this document is the Main Development Area and is shown on **Plate 1**.

Plate 1: Main Development Area



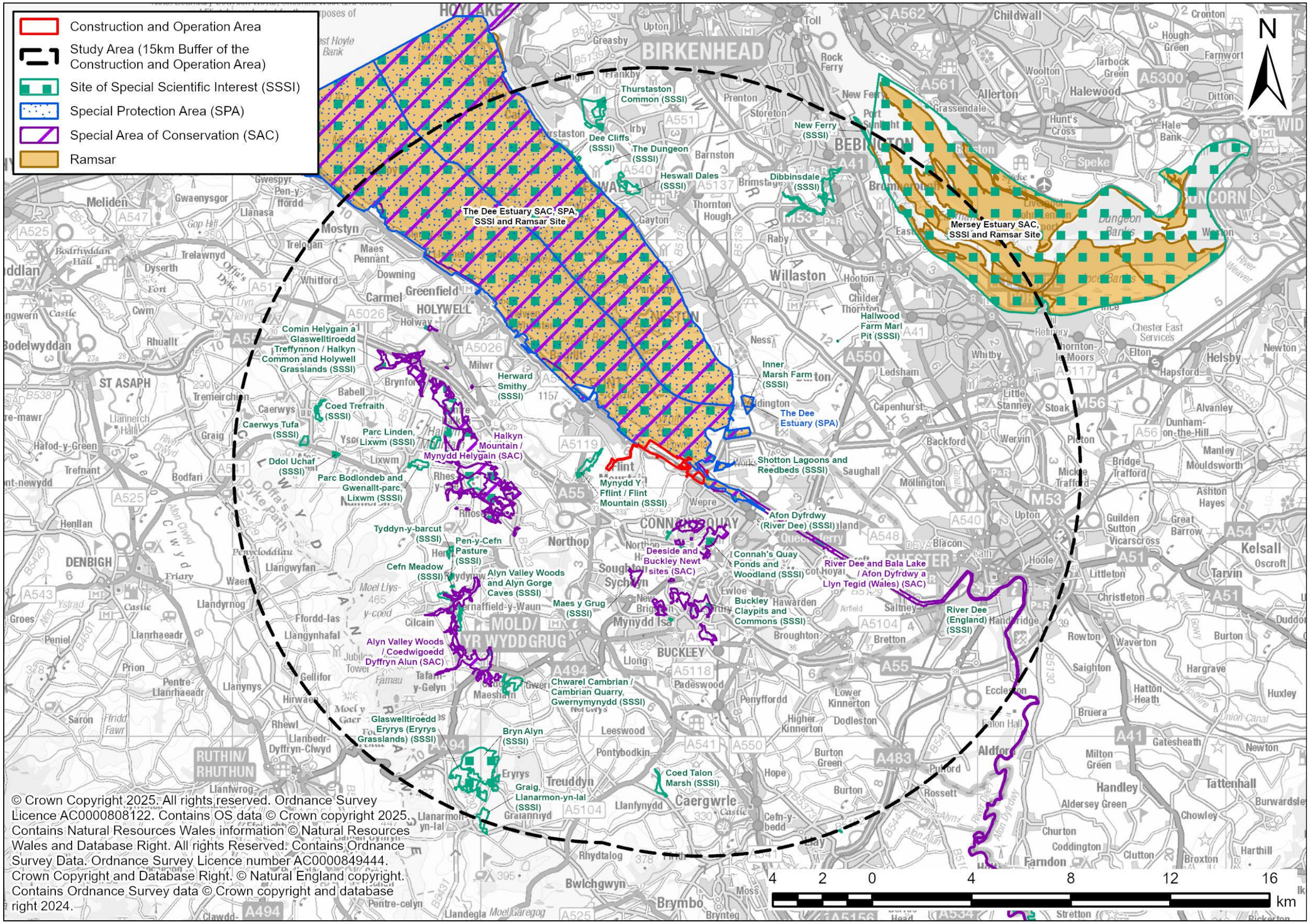
3.3 Main Development Area Context

3.3.1 The Main Development Area is located on land at, and in the vicinity of, the existing Connah's Quay Power Station (Kelsterton Road, Connah's Quay, Flintshire, CH6 5SJ), North Wales.

3.3.2 The Main Development Area which has an indicative area of 56.45 ha includes operational parts of the Applicant's existing Connah's Quay Power Station site to the south-east and agricultural fields to the north-west. It is these fields that are the focus of this document.

3.3.3 There are nine international and 30 national statutory designated sites within 15 km of the Main Development Area as shown on **Plate 2**. The Main Development Area is adjacent to the Dee Estuary /Aber Dyfrdwy SPA / Ramsar site.

Plate 2: Designated Sites



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3.4 Baseline Ornithology Surveys

3.4.1 Baseline ornithology surveys have been completed in support of the Application, the results of which are presented in **Appendix 11-D: Ornithology Technical Appendix** (**EN010166/APP/6.4**) of ES Volume IV. Surveys to establish the use of the Survey Area, including the Main Development Area, by waterbirds, consisted of surveys in the 2022/2023 and 2023/2024 seasons, as detailed below:

- 2022/2023: Surveys were undertaken on behalf of the Applicant by Aspect Ecology between April 2022 and February 2023. These consisted of a single visit each month; and
- 2023/2024: Surveys were undertaken on behalf of the Applicant by AECOM between November 2023 and October 2024. These consisted of one low tide (diurnal) and three high tide (one diurnal and two nocturnal [neap and spring]) visits each month.

3.4.2 The 2022/2023 Aspect Ecology surveys indicated that the fields to be used as a laydown area (in the intermediate term, see paragraph 1.1.1) during construction works and to be lost to the permanent footprint of the Proposed Development, could be used by important numbers of the non-breeding Curlew population associated with the Dee Estuary / Aber Dyfrdwy SPA / Ramsar site. Further surveys were undertaken in 2023/2024 to consider whether the land could be considered to be functionally linked to the Dee Estuary / Aber Dyfrdwy SPA / Ramsar site.

3.4.3 The 2023/2024 surveys identified that the fields are used by important numbers of the non-breeding Curlew population associated with the Dee Estuary / Aber Dyfrdwy SPA / Ramsar site (see **Table 1** and **Plate 3**). As such, these fields are considered to be functionally linked to the Dee Estuary / Aber Dyfrdwy SPA / Ramsar site as they regularly support more than 1% of the qualifying non-breeding Curlew population of the SPA / Ramsar site. Mitigation is therefore required to avoid an adverse effect on the integrity of the designated sites.

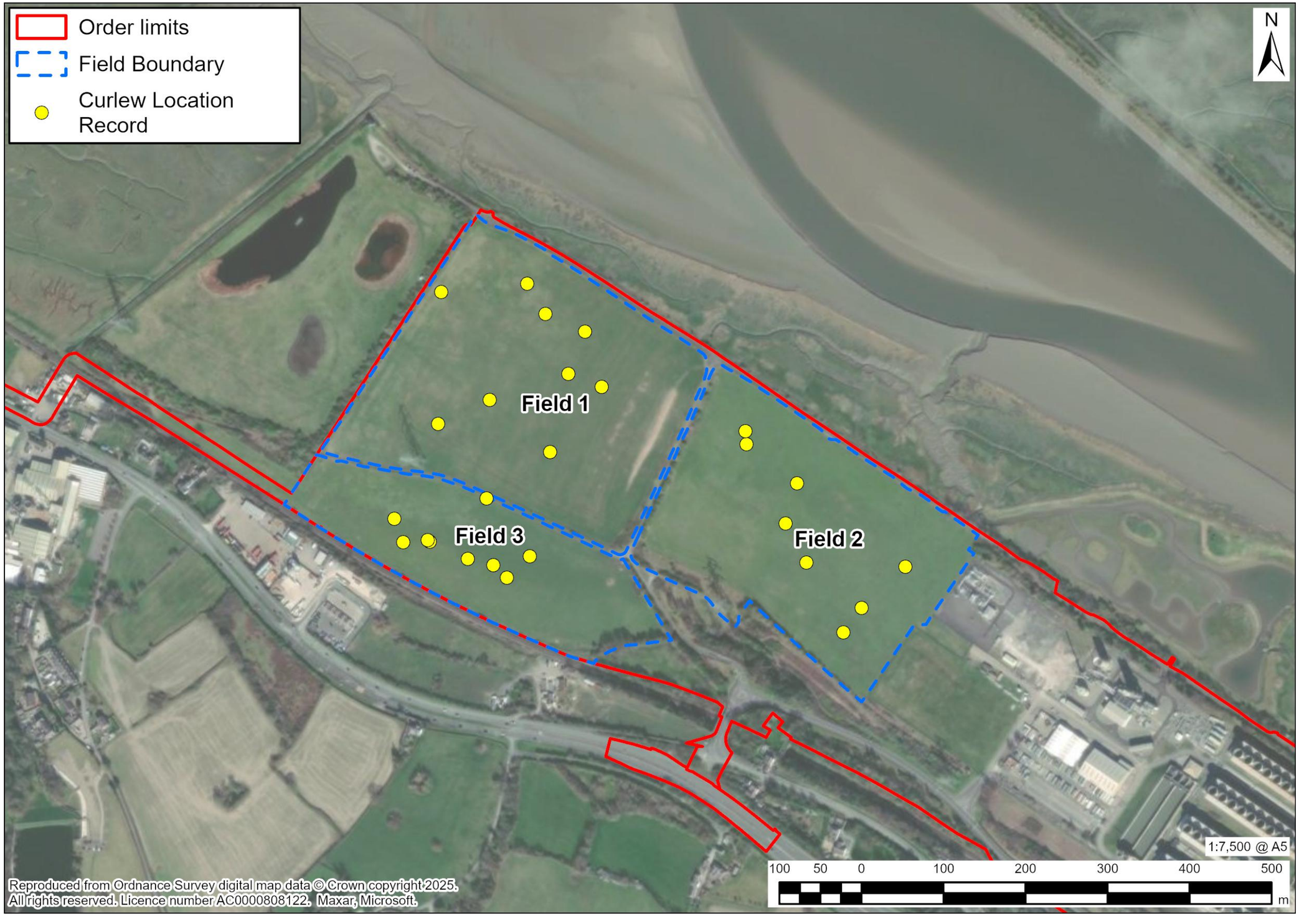
Table 1: 2023/2024 Curlew peak monthly counts within the three fields proposed as laydown area with percentage of the SPA population[2] in parenthesis

November 2023	December 2023	January 2024	February 2024	March 2024	April 2024
52 (1.3%)	92 (2.4%)	69 (1.8%)	42 (1.1%)	0 (0%)	17 (0.4%)

3.4.4 A peak count of 92 individuals (2.4% of the SPA / Ramsar site population) were recorded within the proposed laydown area on a single visit in December 2024 (see **Table 1**). Peak counts in November 2023, January 2024 and February 2024 also exceeded 1% of the SPA / Ramsar site population. Curlew were not recorded using the proposed laydown area outside of the months presented in **Table 1**.

[2] Percentage of the Dee Estuary / Aber Dyfrdwy SPA taken from the revised 2009 data sheet – 3,899 individuals (5 year mean 1994/95-1998/99)

Plate 3: Curlew records (2023/2024) within the Main Development Area



3.4.5 Of the land to be lost to the Proposed Development, approximately 11 ha would be lost temporarily. This loss would not be short-term, lasting up to nine years, but would be reversible as the area would be reinstated upon completion of construction in accordance with the **Outline Landscape and Ecological Management Plan** (**LEMP**) (**EN010166/APP/6.9**). A further 15 ha would be lost in the long-term, until the Proposed Development was decommissioned and removed. Combined total losses therefore equate to 26 ha of FLL for SPA and Ramsar site Curlew, to be lost in the intermediate to long-term.

3.4.6 In defining an adequate area for offsetting, the overall size of the three fields where Curlew were recorded were used. It is noted that the total field area (i.e., the field in its entirety as a functional unit bounded by hedgerow or fencing, rather than the occupied sub-area where birds were recorded) was used on the assumption that this represents a functional ecological unit.

3.4.7 As such, the Applicant initiated a process of identifying and securing appropriate land offsite, to offset the loss of 26 ha of FLL within the Order limits for roosting and foraging Curlew during both construction and operation.

4. Site Selection Process

4.1 Introduction

4.1.1 This section provides and overview of the site selection process undertaken by the Applicant to identify suitable areas for the delivery of the required offsetting measures.

4.1.2 Discussions with Natural Resources Wales (NRW) and Royal Society for the Protection of Birds (RSPB) identified that the offsetting objective should be to ensure no net loss in Curlew foraging and roosting habitat.

4.2 Site Selection Criteria

4.2.1 The Applicant commenced a process of identifying areas of potentially suitable land. Factors considered in identifying potential sites for Curlew offsetting were:

- proximity to the Order limits;
- existing land use and habitats present;
- distance from the SPA / Ramsar site and in particular proximity to the estuary;
- potential sources of disturbance (e.g., noise sources / recreational pressure);
- availability for purchase and opportunity for management in the long term; and
- existing levels of use by Curlew and other bird species.

4.3 Initial Site Identification and Screening

4.3.1 Following the identification of potential sites, all identified land parcels were screened for their suitability to support Curlew during a desk-based review of habitats from aerial imagery and British Trust for Ornithology (BTO) Wetland Bird Survey Data (WeBS) data of the SPA /Ramsar site count sectors.

4.3.2 To support available baseline data, scoping walkover survey visits were then conducted at four potentially suitable sites around the Dee Estuary at Thurstaston, Greenfield, Bagillt Fields and Gronant Fields (the latter near Prestatyn). The focus of these scoping walkovers were to validate the screening exercise and confirm the identified sites could provide a suitable site to meet the objectives of this Plan. It was considered that all four sites were suitable.

4.3.3 Through ongoing and further discussions with landowners the Thurstaston and Greenfield sites were later deemed not available, or not available within the timeframes required and so were excluded from further consideration. The two remaining sites were taken forward for more detailed review: Bagillt Fields and Gronant Fields, as discussed in Section 4.4.

4.3.4 Throughout the site selection process outlines in Section 4.2 and 4.3 there was consistent engagement with NRW and RSPB.

4.4 Sites Considered

Overview

4.4.1 The Applicant undertook eight bird surveys at each the following sites between March 2025 and April 2025 to support WeBS data:

- Bagillt Fields (**Figure A-1**); and
- Gronant Fields (**Figure A-2**).

4.4.2 The surveys included nocturnal and diurnal surveys at high and low tides and were undertaken by an ornithologist in accordance with the general principles of a BTO WeBS.

4.4.3 These sites were presented to and discussed with both NRW and RSPB to understand potential suitability of these sites. In parallel, the applicant prepared desk top appraisal of these sites to explore other potential constraints which could influence the suitability of the sites for mitigation purposes.

Bagillt Fields

4.4.4 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 **Figure A-1**. The grid reference for the approximate centre of the site is SJ 23166 74593.

4.4.5 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. The Flintshire coastal path runs adjacent to the northern and eastern boundaries, however there is currently no public access to the fields.

4.4.6 Bagillt Fields are located within the Dee Estuary / Aber Dyfrdwy SPA / Ramsar site. The area of these fields is 41.8 ha.

Gronant Fields

4.4.7 Gronant Fields are approximately 21.3 km from the Main Development Area, south of Prestatyn Golf Club as shown on **Figure A-2**. The grid reference for the approximate centre of the site is SJ 08228 83684.

4.4.8 Gronant Fields are bound to the north by the North Wales Mainline, to the east by Greenacres Caravan Park, to the west by the agricultural fields and to the south by the A548 Prestatyn Road. There is currently no public access to the fields.

4.4.9 Gronant Fields are located within the Dee Estuary / Aber Dyfrdwy SPA / Ramsar site. The area of these fields is 56.3 ha.

4.5 Preferred Site

4.5.1 In consultation with NRW, the Applicant's preferred option is to deliver 26 ha of habitat creation and improvements within the 56.3 ha site at Gronant Fields.

4.5.2 The main reasons for the selection of the Gronant Fields site over the Bagillt Fields site are as follows:

- the land is capable of flooding in winter/has ways to control water levels/allows for the creation of hollows, channels, foot drains or scrapes;
- there is no direct public access and so disturbance from recreation would be negligible;
- the land consists of individual field parcels over 3 ha in size, with limited intervening boundary vegetation;
- the fields have stockproof boundaries and are suitable for grazing; and
- the land is not identified within the Shoreline Management Plan 2 (Ref 1) for managed retreat.

4.5.3 Wet habitat features would be relatively easy to enhance and create, such as a network of blind linear foot drains or shallow scrapes, and control of water level within the fields would further enhance the value for non-breeding Curlew, as well as other wintering waders, in providing feeding areas as well as roosting areas during high tide.

4.5.4 The Applicant owns the land shown in **Figure A-2** at Gronant Fields. Following the purchase of the land in September 2025, the Applicant has been discussing land management with NRW and has been taking measures aligned to the objectives of this plan to increase the suitability of the area for Curlew. This includes the introduction of a grazier and associated improvements to stock fencing and water supplies.

4.5.5 This Plan specifically addresses the loss of FLL for Curlew associated with the construction, operation and decommissioning of the Proposed Development. Under this Plan the land would be managed until the Proposed Development is decommissioned and the 26 ha of FLL within the Order limits is reinstated to its existing condition unless otherwise agreed with the Secretary of State in consultation with Curlew Steering Group. Management beyond this period is outside the scope of this Plan.

5. Existing Conditions

Land Management and Habitats

5.1.1 The Gronant Fields site mainly comprises other neutral grassland and there are three fields of cultivated land in the south-west corner (see **Plate 3**). Up until the Applicant's ownership, the fields appear not to have been managed since 2024 and areas of historically cultivated land have been colonised by arable weeds. The grassland is periodically inundated and prior to the Applicant's ownership resembled a rush-pasture in its structure and composition, which along with the sward height is reducing its suitability for Curlew and other waders.

5.1.2 Most of the fields at the Gronant Fields site are located adjacent to water filled ditches. Some of these ditches support tall emergent plants, particularly common reed (*Phragmites australis*) which is beginning to colonise the adjacent fields. There is a pond in the central part of the Gronant Fields site and several ephemeral pools which temporarily hold rainwater. There is a fragmented hedgerow adjacent to a ditch in the central-east part of the Gronant Fields site. Relevant habitat features are shown on **Figure A-4**.

Notable Bird Records

Wetland Bird Counts

5.1.3 The distribution of notable bird species recorded by the Applicant at the Gronant Fields site during March and April 2025 are shown on **Figure A-5**. Alongside BTO WeBS data these were used to establish current usage of the Gronant Fields site by birds.

Curlew

5.1.4 A suite of nocturnal and diurnal high tide and low tide wetland bird surveys were carried out by the Applicant during March and repeated in April 2025. A peak count of 20 Curlew was recorded at the Gronant Fields site (west land parcel of the WeBS count sector) on 31 March 2025. This relatively low peak count might reflect that Curlews had started to disperse from the SPA / Ramsar site to their breeding grounds.

5.1.5 The Applicant continued surveys through the 2025/2026 wintering period commencing in November 2025 and will continue bird surveys as part of ongoing monitoring as phases 1 and 2 are implemented. The survey information to date, including counts of Curlew recorded is included within **Table 2**.

Table 2: 2025/2026 wintering surveys

Date	Day or Night	Tide	Curlew	Commentary
05-Nov-25	Nocturnal	HT	2	Both records located within fields adjacent to the Gronant Fields site

Date	Day or Night	Tide	Curlew	Commentary
06-Nov-25	Diurnal	HT	1	Record located within fields adjacent to the Gronant Fields site
11-Nov-25	Diurnal	LT	0	N/A
04-Dec-25	Nocturnal	HT	0	N/A
05-Dec-25	Diurnal	HT	0	N/A
09-Dec-25	Diurnal	LT	0	N/A
06-Jan-26	Diurnal	HT	7	All records located within fields adjacent to the Gronant Fields site
15-Jan-26	Diurnal	LT	0	N/A
15-Jan-26	Nocturnal	HT	0	N/A
04-Feb-26	Diurnal	HT	47	All records located within fields adjacent to the Gronant Fields site
12-Feb-26	Diurnal	LT	41	All records located within fields adjacent to the Gronant Fields site
12-Feb-26	Nocturnal	HT	0	N/A
05-Mar-26	Diurnal	HT	20	16 curlew recorded within the Gronant Fields site. 15 were recorded in a group within the west of the Gronant Fields site and a single record located in the north-east.
17-Mar-26	Diurnal	LT	0	N/A
17-Mar-26	Nocturnal	HT	0	N/A
02-Apr-26	Diurnal	HT	0	N/A
28-Apr-26	Diurnal	LT	0	N/A
28-Apr-26	Nocturnal	HT	0	N/A

Other Species

5.1.6 Two species listed on Schedule 1 of the Wildlife and Countryside Act 1981 (as amended) were recorded at the Gronant Fields site by the Applicant: barn owl (*Tyto alba*) and Cetti's warbler (*Cettia cetti*):

- a barn owl was recorded roosting in a crack willow (*Salix fragilis*) next to the pond. The crack willow is a potential nest site; and
- six Cetti's warblers were recorded calling from within ditch vegetation across the Gronant Fields site.

5.1.7 In addition to curlew, teal (*Anas crecca*) is another SPA species that was regularly recorded during the winter 2025/6 with a peak count of 18 on 4th December 2025.

Secondary Data

5.1.8 The WeBS Five Year (2018 to 2023) peak count for Curlew at the Gronant Fields site, which includes a disjunct land parcel (the combined WeBS count sector is known by BTO as 'Gronant Fields') is 95 individuals (range 53 to 144).

5.1.9 WeBS core count data for the Gronant Fields site was provided by NRW for the following winter (October to March) periods:

- 2015-16;
- 2016-17;
- 2022-23;
- 2023-24;
- 2024-25; and
- 2025-26.

5.1.10 The headline results of the WeBS surveys are presented in **Table 3**. Species presented in bold font are qualifying features of the Dee Estuary SPA, and have the peak count presented as a percentage of the SPA population at designation in brackets. Species marked with a cross (†) are assemblage features of the SPA, and Parcels with an asterisk (*) are those that lie outside the Applicant's ownership boundary (Parcels 91 and 92). All species are presented in taxonomic order, in line with the 10th Edition of the British List from the British Ornithologists' Union (BOU) (Ref 2). Ad-hoc records of non-waterbird species from the WeBS dataset have been excluded from **Table 3**.

5.1.11 The Dee Estuary SPA qualifying feature peak counts and number of records by Gronant Fields Parcel from the last five years of WeBS data are presented in **Appendix B**. Species are presented in taxonomic order (Ref 2) with the exception of Redshank, which was not recorded within this timeframe.

Table 3: Gronant Fields WeBS data peak counts and dates by species with the number of parcels each species was recorded in and the number of records (how many times a species was recorded across the survey programme)

Species	Number of Parcels	Number of Records	Peak Count	Peak Count Parcel	Peak Count Date
Canada Goose	1	1	4	98	31/03/2026
Pink-footed Goose	3	3	200	98	17/02/2025
Mute Swan	1	1	2	94	12/02/2017
Shelduck	**1**	**1**	**1 (0.01%)**	**104**	**09/10/2022**
Mallard	11	22	16	96	11/12/2022
Moorhen	1	1	1	93	11/02/2024
Oystercatcher	**8**	**10**	**20 (0.09%)**	**98**	**11/02/2024**
Lapwing†	5	6	150	92	12/01/2025
Curlew	**10**	**31**	**76 (1.95%)**	**94**	**13/12/2015**
Black-tailed Godwit	**1**	**1**	**10 (0.57%)**	**95**	**11/12/2022**
Redshank	**1**	**1**	**1 (0.02%)**	**95**	**15/01/2017**
Black-headed Gull	11	33	300	92	22/02/2026
Common Gull	2	4	6	92	12/03/2017
Herring Gull	10	42	80	97	17/12/2023
Lesser Black-backed Gull	4	5	7	99	10/03/2024
Little Egret	1	1	1	91	17/02/2025
Grey Heron	6	8	5	98	10/03/2024

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6. Implementation Timetable and Programme

6.1 Phase 1

6.1.1 Before the Curlew habitat offsetting measures are implemented consideration will be given, to other protected/ otherwise notable species at the Gronant Fields site.

6.1.2 The first phase of the implementation of the Curlew habitat offsetting measures will be delivered through the following action (see **Figure A-3**):

- implementation of a suitable grazing/mowing regime to maintain an optimal sward height and required levels of ground disturbance to promote soil invertebrate abundance. This will target having a short sward height (no higher than 10 cm during the winter period (October – March) to maximise foraging opportunities for Curlew. This action would target improving accessibility to the existing soil invertebrate prey resource.

Establishment and Long-term Management of Wet Grassland

6.1.3 The implementation of the actions set out in section 6.1.2 (and the securing of any associated consents or permissions required to deliver phase 1) will be implemented prior to the commencement of construction works at the areas of the Main Development Area for which offsetting is required, to ensure that the mitigation provision is available prior to any displacement occurring.

6.1.4 Sward structure plays an important role in invertebrate abundance and availability, so the grass height would not exceed 10 cm during the period October to March. This would be achieved through mowing and/or grazing during spring, summer and autumn to ensure the sward can be retained at a suitable height during the winter. The last mechanical cut or mow would be undertaken no later than October in any given year. The long-term objective is to increase the densities of soil invertebrates, which will be aiding by a cessation in ploughing, pesticide application and subsequent build-up of high organic content, which comes from undisturbed soils.

6.1.5 Within the first 12 months of ownership, the offsetting area will be intensively grazed by sheep / cattle or subject to repeat mowing/cutting to reduce the extent of tall dense vegetation and open up/disturb the sward. Any cuttings will be removed to appropriate storage areas on Gronant Fields site. The sward will be maintained at a height of no more than 10 cm during the months of October to March.

6.1.6 Once the areas are fully established and the desired sward height achieved, the area will receive one mechanical cut in late summer/ early autumn. Any management activities will be restricted for the full extent of the breeding season (typically March to August inclusive). In future years, low intensity sheep / cattle grazing (within fenced areas and where appropriate) in autumn

will provide the optimum conditions, however, where this is not possible, a further cut late in the season will be carried out to ensure that a sward height of no higher than 10 cm remains throughout the winter period.

6.1.7 Annual habitat management will be required for the fields to prevent overgrowth (of tall wetland plants and / or scrub).

6.2 Further Enhancement Opportunities

6.2.1 Phase 2 of the proposals for the 26 ha offset area and wider enhancement of the Gronant Fields site ~~-~~would follow the creation of the replacement curlew habitat, as described in section 6.1.2, and so would take place in parallel and subsequent to works having commenced in the Main Development Area.

Phase 2 – Further enhancement of wet grassland

6.2.2 If determined to be necessary ~~by the Curlew Steering Group~~, further enhancement measures could be brought forward within the offsetting area to further enhance its suitability for Curlew and other waders. The requirement for the implementation of any further enhancement would be based on the annual monitoring surveys (see Section ~~-~~6.3).

6.2.3 The enhancement would likely be in the form of a network of created linear foot drains (or similar wet feature creation) to provide optimal foraging habitat for Curlew. Potential foot drain locations are shown on **Figure A-3**. The aim of this enhancement would be to provide additional foraging (and roosting) opportunities for Curlew throughout the late autumn, winter and early spring period (October to March) by providing conditions that would support high densities of Curlew invertebrate prey found in field vegetation and the soil surface (in particular earthworms, beetles and fly, especially crane fly, larvae). This will be achieved by:

- creating a network of 'blind' linear foot drains to hold and collect any floodwater during the winter and into the spring, thereby keeping the soil moist (but not saturated), channelling surface water so that the grassland isn't completely or regularly inundated and keeping the availability of Curlew invertebrate prey near to the soil surface;
- control of water tables within the Gronant Fields site and in the surrounding ditches to keep the grassland damp and prevent extensive drying out during periods of peak Curlew occurrence (November to March); and
- ensuring the core area maintains an open aspect, through management of boundary vegetation within the Gronant Fields site and prevention of encroaching reed and other tall dense vegetation away from existing ditches which may reduce the suitability of grasslands for foraging.

6.2.4 The Curlew Implementation and Monitoring Plan will outline when sufficient data will have been obtained to determine the requirement for further enhancement through water management measures (Phase 2).

6.2.5 A decision on the final approach to the Phase 2 enhancements would be ~~agreed~~made in consultation with the Curlew Steering Group.

Example Enhancement Implementation

6.2.6 This section outlines how an example enhancement measure would be implemented within the off-setting area (subject to such measure being progressed in line with agreement from the Curlew Steering Group).

Control of Water Levels

6.2.7 During the winter period (between November and February) it would be necessary to maintain areas of shallow surface water flooding, ideally with:

- a range of depths from 1 cm to 50 cm;
- cover of 5% to 30% of the area, which can change naturally to prevent stagnation; and
- muddy edges for waders to feed in.

6.2.8 Water levels would need to be controlled to avoid large areas of the grassland being inundated for sustained periods of time, as prolonged inundation of soils will deplete food resources such as earthworms.

6.2.9 The condition and function of existing water control structures has not been explored in detail. Further information on the control of water would be detailed in the Curlew Implementation and Monitoring Plan.

Creation of Foot Drains

6.2.10 Naturally occurring flooding of the offsetting area from existing water-filled ditches would help create suitably damp/wet conditions for Curlew, but this will be periodic, with water quickly draining back off into existing ditches. Therefore, it is considered that additional habitat management ~~iwould~~would be required. One of these measures would be the creation of a network of foot drains which are a common habitat feature deployed to support diverse invertebrate assemblages and create suitable habitat conditions for waders. They are shallow depressions with gently sloping edges, designed to hold water seasonally and potentially remaining damp throughout the year.

6.2.11 Because Curlew will be most interested in edge habitat (i.e., the ecotonal boundary where the amount of water is sufficient to maintain dampness) rather than the deeper sections of scrapes, a network of foot drains would be delivered across 26 ha of the Curlew offsetting area, designed to maintain shallow water levels and maximise edge habitat. Foot drains would be created using excavators or rotary ditchers to widths of 1–2 m and depths of 30 cm (i.e., not extending beyond the depth of topsoil), ensuring a gently sloping edge profile that provides ideal conditions for invertebrates and foraging waders. Any excavated topsoil would be redistributed on the surrounding land.

6.2.12 Given that the soils within the Gronant Fields site are dominated by heavy clays, the foot drains would predominantly retain perched water and/or be fed by rainfall. To increase the likelihood that the foot drains reliably retain adequate volumes of water in winter, they could be arranged to connect with water filled ditches and ephemeral pools within the Curlew offsetting area. Despite the ephemeral nature of some of these features, all are likely to hold water in winter. Connecting the network of foot drains with any of these water features would very likely increase its overall value to Curlew. Overall,

delivering a network of foot drains (or similar wet features) in the offsetting area would increase the likelihood of creating ideal conditions for the invertebrate assemblages on which Curlew rely.

Alternate Solution

6.2.13 As discussed in paragraph 6.2.3, the enhancement offering could alternatively consist of the creation of shallow scrapes that would become seasonally inundated and by raising ground water level at appropriate times, rather than the creation of foot drains. The final solution will be informed by the ongoing water monitoring and other ecological investigations and will be agreed in collaboration with members of the Curlew Steering Group

6.3 Environmental Controls

6.3.1 This section outlines indicative environmental controls that would be in place should it be determined that further enhancement measures are necessary. The final measures would be confirmed prior to works commencing and where required, implemented in accordance with any required consents, licences or approvals.

Access

6.3.16.3.2 AltIt is assumed that access for mechanical plant would be provided by the existing field accesses on Shore Road or Prestatyn Road (A548). Existing internal field accesses would be used to navigate within the Gronant Fields site between the different field parcels. Appropriate buffer zones would be applied from retained habitats and watercourses present within the Gronant Fields site to avoid disturbance.

Working Hours

6.3.26.3.3 Working hours would be 08:00 and 18:00 Monday to Friday (except Bank Holidays) and 08:00 and 13:00 on Saturdays, unless otherwise agreed with the Local Planning Authority.

General Environmental Controls

6.3.36.3.4 Standard and best practice control measures would be implemented during thea works to control the generation of dust, to minimise noise and manage pollution risk. The final measures to be applied will be included within the Curlew Implementation and Monitoring Plan. Indicative measures are outline below:

- Air Quality:
  - display the name and contact details of person(s) accountable for air quality and dust issues on the Proposed Development; and
  - develop and implement a Dust Management Plan (DMP), which may include measures to control other emissions.
- Noise and Vibration:
  - using modern plant, complying with the latest European noise emission requirements;
  - selection of inherently quiet plant where practicable; and
  - all plant and equipment being used for the works to be properly maintained, silenced where appropriate, operated to prevent excessive noise and switched off when not in use.
- Soils and Geology:
  - measures to control the storage, handling and disposal of potentially polluting substances during construction;
  - appropriate method and mitigation measures when undertaking works within, under and adjacent to water features including managing any risk of physical damage to water features;

- follow guidance set out with relevant Gguidance for Pollution Prevention (GPP), Including GPP1, 2, 3, 4, 5, 6, 8, 13, 19, 20, 21, 22, 26 and 27;
- complete ~~an~~a preliminary unexploded ordnance ~~study~~risk assessment;
- follow guidance set out within DEFRA's Construction Code of Practice for the Sustainable Use of Soils on Construction Sites (2009) and Good Practice Guide for Handling Soils in Mineral Workings.

- Waste
  - develop and implement a Site Waste Management Plan.

Biosecurity Measures

~~6.3.4~~6.3.5 The Applicant will undertake an Invasive Non-Native Species Survey of the Gronant Fields site and any recommendations would be included within the Gronant Fields LEMP.

7. Monitoring and Management

7.1 Monitoring and Management

Monitoring

7.1.1 To demonstrate the effectiveness of the implemented habitat creation and enhancement measures in supporting Curlew, monthly visits covering each month of the year will be carried out by ornithologists. The number of Curlews present on each visit, along with how they are using the Gronant Fields site, will be recorded (to allow comparison between visits and winters) at the following intervals:

1. prior to habitat creation works (Phase 1); and
2. first ten years after habitat creation works (Phase 1).

7.1.2 Following the collection of two years of Curlew monitoring data and water monitoring data (up to August 2028), in consultation with the Curlew Steering Group, the requirement for works as part of Phase 2 will be determined. Any works as part of Phase 2 will be undertaken from 2029 onwards, depending upon the final measures taken forward and any seasonal constraints that may apply. A programme of ongoing monitoring for Phase 2 works will be ~~agreed~~developed with the Curlew Steering Group. Monitoring may include the effectiveness of the foot drains and wet grassland for the same time periods as the bird survey set out above, along with ensuring that the correct levels of water are maintained, along with optimal vegetation levels at the edge habitats.

7.1.3 The annual reporting period will be agreed with the Curlew Steering Group and detailed within the Curlew Implementation and Monitoring Plan. It is envisaged an annual monitoring report will be submitted to the Curlew Steering Group and the Secretary of State in Q4. The data will also be provided to the Local Environmental Records Centre on an annual basis and posted on the Project website.

Adaptive management

~~7.1.3~~7.1.4 The monitoring will allow for adaptive management and the taking of any remedial actions. Adjustments of vegetation management, such as grazing levels and control of tall emergent and scrub vegetation, would be undertaken as needed to ensure suitable conditions for Curlew remain on Gronant Fields site. The Gronant Fields site will be subject to long term management based on the results of the first ten years of monitoring. The management plan for the Gronant Fields site will be a live document and adapted as required. Any changes to the management plan will be ~~agreed~~discussed with the Curlew Steering Group in accordance with the Curlew Implementation and Monitoring Plan.

~~7.1.4~~7.1.5 The results of these monitoring activities will be made available to the Curlew Steering Group ~~following completion of work at each interval~~and Secretary of State within the relevant annual report.

Maintenance and Decommissioning

7.1.6 The Applicant will maintain any enhancements in accordance with the Curlew Implementation and Monitoring Plan until the Proposed Development is decommissioned and the 26 ha of FLL within the Order limits is reinstated to its existing condition. The Applicant will obtain the consent of the Secretary of State prior to stopping the management activities required by the Curlew Implementation and Monitoring Plan.

7.2 Other Considerations

7.2.1 Noting that the land at Gronant Fields is outside of the Order limits, the Applicant ~~would seek~~has obtained the necessary permissions and consents for Phase 1 ~~prior to any of Work No. 1 commencing. These permissions and consents would be based on the details to be developed and presented in the Curlew Implementation and Monitoring Plan in accordance with Requirement 11 and Schedule 16 of the **Draft DCO** (**EN010166/APP/3.1**).~~ **Appendix C** identifies the necessary permissions and consents required to implement the Plan.

7.2.2 To inform and support the development of the Curlew Implementation and Monitoring Plan post-consent, further studies ~~will be undertaken. This includes~~are ongoing. These include phase 2 ecological surveys, as recommended within the Gronant Fields **Preliminary Ecological Appraisal** (see the **Offsite NBB and GI Strategy** (**EN010166/APP/6.14**)), ~~and~~ additional ~~environmental~~baseline soil and peat surveys ~~such as ground~~, and the ongoing ecohydrological site investigation ~~and groundwater monitoring. Further details of the proposed ground investigations are provided below.~~

7.2.3 Further details of the ground investigations to date are provided below.

Ground Investigations

~~7.2.3 To support any potential enhancement through the creation of linear foot drains, the Applicant is in discussion with NRW on the scope of the required ground investigations. As these discussions are ongoing, this Plan only outlines the aims of the ground investigations, which are repeated below:~~

- ~~Investigate near surface soils (<0.5m) and their moisture content / water retention properties; and~~
- ~~Determine the near surface ground profile (<3.0m) and near surface groundwater conditions and the potential influence of groundwater which will inform the future management of water levels.~~

7.2.4 An ecohydrological site investigation scope has been agreed with NRW. In October 2026, a series of dip wells and stilling wells were installed by the Applicant across the Gronant Fields site in accordance with the agreed methodology to monitor groundwater levels and surface water conditions. The purpose of the investigation is to develop and agree the hydrological supporting conditions (HSCs) required for overwintering curlew.

7.2.5 Groundwater level data will be collected and downloaded following six and 12 months of monitoring, after which an ecohydrological conceptual model will be developed to identify the hydrological controls on the water table elevation (WTE) regime across the Gronant Fields site. The outcomes of this work will inform the assessment of opportunities for habitat enhancement, including the potential creation of linear foot drains.

7.2.6 The Applicant has also agreed the scope of peat condition surveys with NRW, which are expected to be carried out in 2027. Following discussions with NRW, soil structure surveys are also expected to be carried out alongside the soil invertebrate surveys, although agreement on the final scope of this work is ongoing.

~~7.2.4~~7.2.7 The Curlew Implementation and Monitoring Plan will provide the final details of ~~the ground investigation~~these surveys.

7.3 Success Criteria

7.3.1 The success of the measures set out in this Plan will be determined by the following:

- ~~Annually~~From prior to the loss of the FLL until the Proposed Development is decommissioned and removed ~~provide~~, the provision of 26 ha of wet grassland, and if appropriate, created wet features, specifically managed for non-breeding Curlew, following the management prescriptions set out in this Plan. The condition of these measures will be monitored as set out in Section 7.1 to ensure they are functioning as set out in this Plan and ~~in agreed~~as discussed with the Curlew Steering Group;
- ~~The~~Following the loss of the FLL, the offsetting area will provide an optimal foraging resource for Curlew, ensuring that it regularly supports at least an equivalent proportion of the SPA qualifying population (i.e., >1%) to that being displaced from the Main Development Area of the Order limits.

7.4 Summary

7.4.1 The measures set out in this Plan are sufficient to ensure that there is no net loss in foraging habitat for Curlew associated with the Dee Estuary / Aber Dyfrdwy SPA / Ramsar site arising from the temporary and permanent habitat loss within the Main Development Area of the Proposed Development.

8. Curlew Steering Group

8.1.1 It is proposed that a Curlew Steering Group is formed to be consulted upon the Curlew Implementation and Monitoring Plan, review the results of the annual monitoring report and to ~~agree~~discuss any management activities on an annual basis.

8.1.2 ~~It is envisaged that the Curlew Steering Group would comprise at~~At least one member of each of the following parties would be invited to participate as a core member of the Curlew Steering Group:

- the undertaker;
- Natural Resources Wales; and
- ~~Flintshire~~Denbighshire County Council~~; and~~.
- ~~RSPB.~~

8.1.3 The ~~Deeside Naturalists~~Royal Society ~~would also~~for the Protection of Birds and the Deeside Naturalists' Society must be invited to ~~meetings held by~~participate as advisory members of the Curlew Steering Group.

8.1.4 Part 1 of Schedule 16 of the **Draft DCO (EN010166/APP/3.1)** states that the no stage of Work No. 1 or any site clearance works required in connection with Work No. 1 may commence until a plan for the work of the Curlew Steering Group has been submitted to and approved ~~by the Secretary of State~~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.

8.1.5 ~~The~~This plan must include:

- terms of reference of the Curlew Steering Group;
- the membership of the Curlew Steering Group;
- details of the schedule of meetings, timetable for preparation of the Curlew Implementation and Monitoring Plan and reporting and review periods; and
- the dispute resolution mechanism and confidentiality provisions.

8.1.6 The undertaker will consult the Curlew Steering Group on the draft Curlew Implementation and Monitoring Plan prior to its submission to the Secretary of State. The Curlew Implementation and Monitoring Plan must include a signed "CSG agreement log" to record how the Curlew Implementation and Monitoring Plan has had regard to the output of this consultation with the Curlew Steering Group.

~~8.1.6~~8.1.7 The Curlew Steering Group will cease to exist when the Proposed Development is decommissioned and removed.

References

Ref 1. North West England and North Wales Coastal Group (2016), Shoreline Management Plan 22 – The Great Orme [Online]. Available at: https://www.mycoastline.org.uk/shoreline-management-plans/ (Accessed 25/07/2025)

Ref 2. British Ornithologists' Union. (2022). The British List: A Checklist of Birds of Britain (10th edition). Ibis 164: 860–910.

Ref 3. Rodwell, J.S. (1992). British Plant Communities Volume 3: Grasslands and Montane Communities. Cambridge University Press.

Abbreviations

Term	Definition
BTO	British Trust for Ornithology
C&IEA	Construction and Indicative Enhancement Area
CCP	Carbon Capture Plant
CCGT	Combined Cycle Gas Turbine
CO_2	Carbon dioxide
CQLCP	Connah Quay Low Carbon Power
DCO	Development Consent Order
ES	Environmental Statement
EU	European Union
FLL	Functionally Linked Land
LEMP	Landscape and Ecology Management Plan
MW	Megawatt
NGET	National Grid Electricity Transmission
NRW	Natural Resources Wales
RSPB	Royal Society for the Protection of Birds
SPA	Special Protection Area
UK	United Kingdom
WeBS	Wetland Bird Survey Data

Appendix A: Figures



Revision: 1 Drawn: LP Checked: OB Approved: NS Date: 2026-05-26

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PROJECT

Connah's Quay Low Carbon Power

CONSULTANT

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LEGEND

Site Boundary

NOTES

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ISSUE PURPOSE

Outline Curlew Implementation and Monitoring Plan

DATE

May 2026

PROJECT NUMBER

60768754

FIGURE TITLE

Bagillt Fields Location

FIGURE NUMBER

Figure A1



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LEGEND

Site Boundary

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DATE

May 2026

PROJECT NUMBER

60768754

FIGURE TITLE

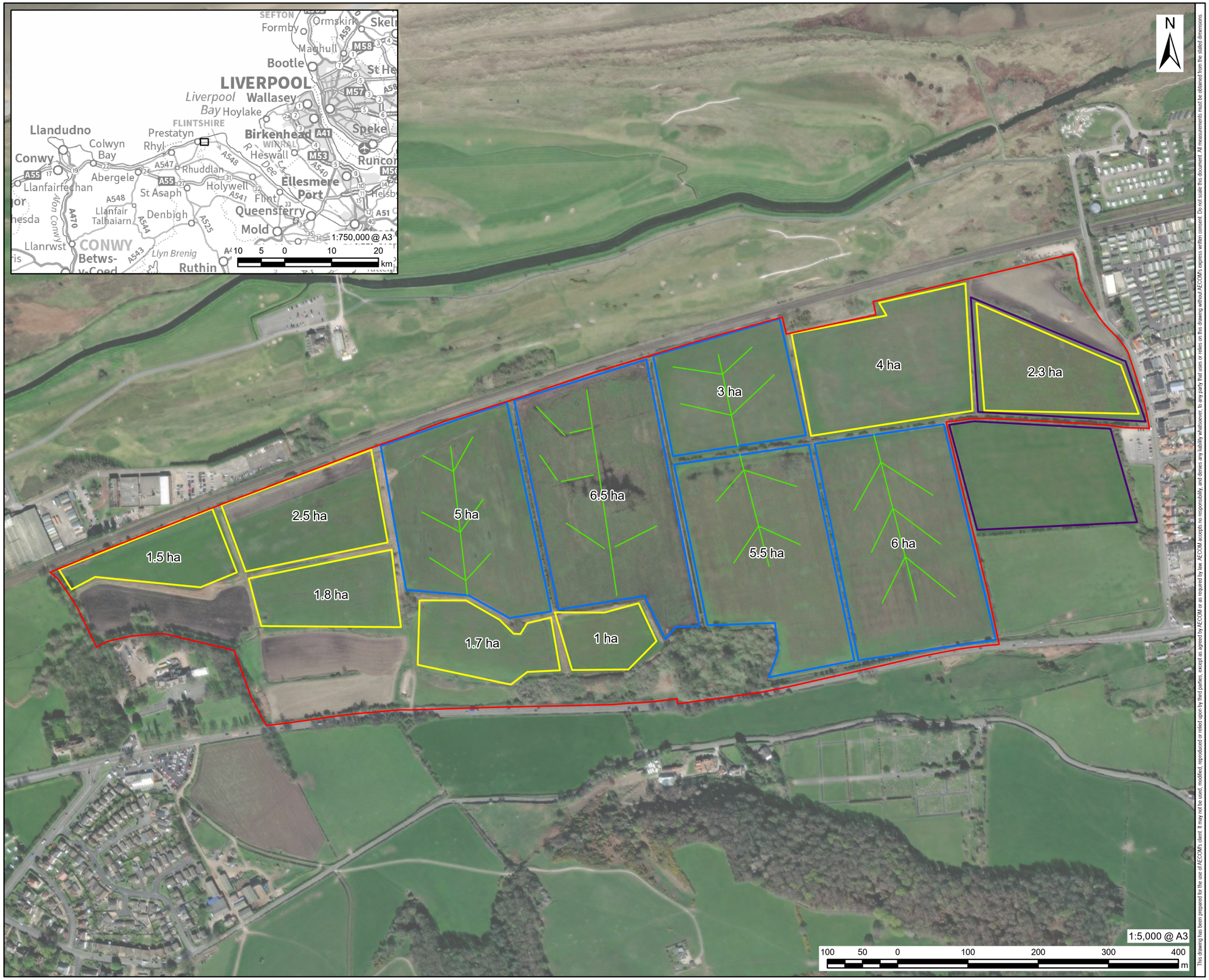
Gronant Fields Location

FIGURE NUMBER

Figure A2

Revision: 1 Drawn: LP Checked: OB Approved: NS Date: 2026-05-26

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LEGEND

- Site Boundary
- Created Foot Drain
- Core Curlew Area
- Secondary Curlew Area
- Areas Curlew Recorded

NOTES

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PROJECT NUMBER

60768754

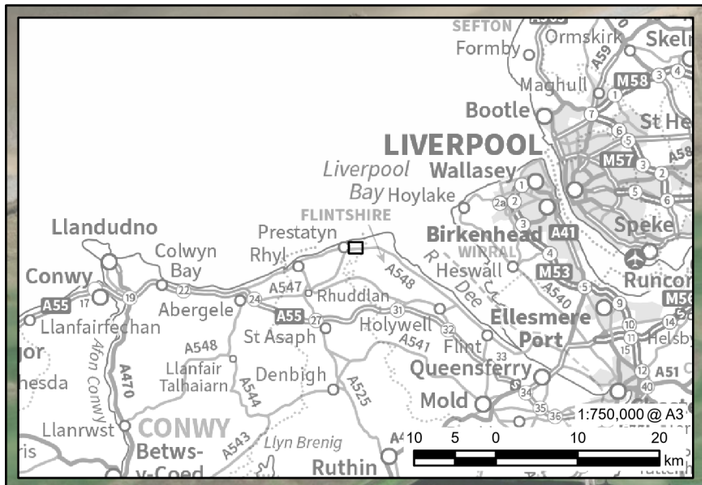
FIGURE TITLE

Curlew Habitat Creation and Enhancements

FIGURE NUMBER

Figure A3

Revision: 0 Drawn: JA Checked: AG Approved: SC Date: 2026-05-26



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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

- Site Boundary
- Ephemeral Pool
- Pond
- Water Filled Ditch
- Common Reed

NOTES

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ISSUE PURPOSE

Outline Curlew Implementation and Monitoring Plan

DATE

May 2026

PROJECT NUMBER

60768754

FIGURE TITLE

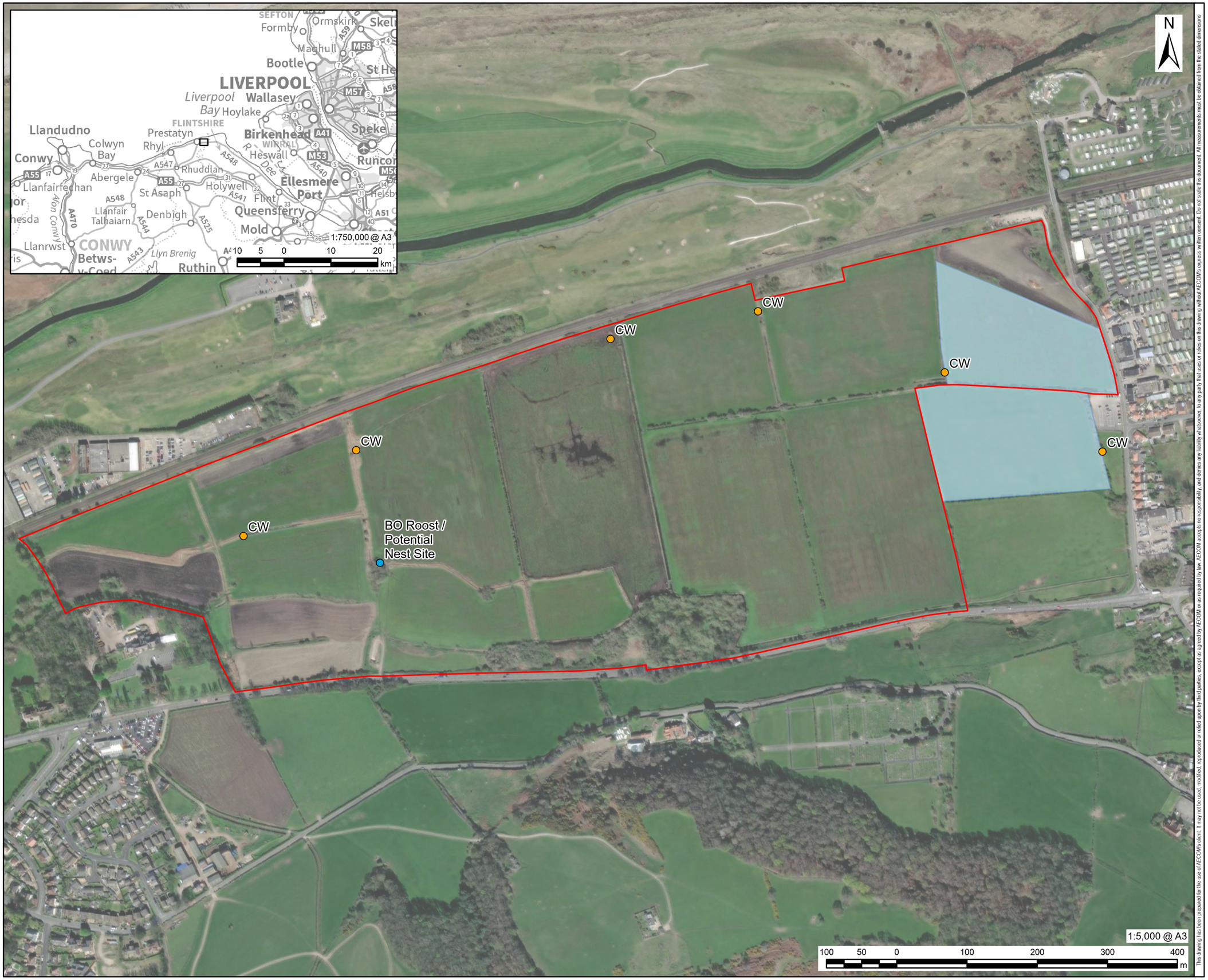
Existing Habitat Features

FIGURE NUMBER

Figure A4

Filename: C:\Users\PringL\OneDrive - AECOM\General - Uniper Connah's Quay LCDP DCO\900_CAD_GIS\920_GIS\02_Maps\Post DCO Submission\Deadline 6\CQ_PostDCO_Curlew_Mitigation_Strategy_20260528_01.aprx

Revision: 1 Drawn: LP Checked: OB Approved: NS Date: 2026-05-26



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Filename: C:\Users\Pring\.OneDrive - AECOM\General - Uniper Connah's Quay LCDP DCO\600_CAD_GIS\620_GIS\02_Maps\Post-DCO Submission\Deadline 6\CQ_PostDCO_Curlew_Mitigation_Strategy_20260526_01.aprx

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PROJECT

Connah's Quay Low Carbon Power

CONSULTANT

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

LEGEND

- Site Boundary
- Curlew Foraging Field

Species

- Barn Owl (BO)
- Cetti's Warbler (CW)

NOTES

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ISSUE PURPOSE

Outline Curlew Implementation and Monitoring Plan

DATE

May 2026

PROJECT NUMBER

60768754

FIGURE TITLE

Notable Bird Records Distribution Map

FIGURE NUMBER

Figure A5

Appendix B: Dee Estuary SPA Peak Counts and Records (Gronant Fields, Last 5 Years)

Table 4: Most recent five years of available WeBS data for Shelduck at Gronant Fields by Parcel.

Parcel	2021-22		2022-23		2023-24		2024-25		2025-26	
	Peak Count	Records	Peak Count	Records	Peak Count	Records	Peak Count	Records	Peak Count	Records
91	No data	No data	-	-	-	-	-	-	-	-
92	No data	No data	-	-	-	-	-	-	-	-
93	No data	No data	-	-	-	-	-	-	-	-
94	No data	No data	-	-	-	-	-	-	-	-
95	No data	No data	-	-	-	-	-	-	-	-
96	No data	No data	-	-	-	-	-	-	-	-
97	No data	No data	-	-	-	-	-	-	-	-
98	No data	No data	-	-	-	-	-	-	-	-
99	No data	No data	-	-	-	-	-	-	-	-
100	No data	No data	-	-	-	-	-	-	-	-
101	No data	No data	-	-	-	-	-	-	-	-
102	No data	No data	-	-	-	-	-	-	-	-
103	No data	No data	-	-	-	-	-	-	-	-
104	No data	No data	1	1	-	-	-	-	-	-
105	No data	No data	-	-	-	-	-	-	-	-
106	No data	No data	-	-	-	-	-	-	-	-
107	No data	No data	-	-	-	-	-	-	-	-

Parcel	2021-22		2022-23		2023-24		2024-25		2025-26	
	Peak Count	Records	Peak Count	Records	Peak Count	Records	Peak Count	Records	Peak Count	Records
108	No data	No data	-	-	-	-	-	-	-	-

Table 5: Most recent five years of available WeBS data for Oystercatcher at Gronant Fields by Parcel.

Parcel	2021-22		2022-23		2023-24		2024-25		2025-26	
	Peak Count	Records	Peak Count	Records	Peak Count	Records	Peak Count	Records	Peak Count	Records
91	No data	No data	-	-	1	1	-	-	-	-
92	No data	No data	-	-	1	1	1	1	-	-
93	No data	No data	-	-	-	-	-	-	-	-
94	No data	No data	-	-	-	-	-	-	-	-
95	No data	No data	-	-	-	-	-	-	-	-
96	No data	No data	-	-	-	-	-	-	-	-
97	No data	No data	-	-	6	1	-	-	-	-
98	No data	No data	-	-	-	-	20	1	-	-
99	No data	No data	-	-	-	-	-	-	-	-
100	No data	No data	-	-	-	-	-	-	-	-
101	No data	No data	-	-	-	-	-	-	-	-
102	No data	No data	-	-	-	-	-	-	-	-
103	No data	No data	-	-	-	-	-	-	-	-

Parcel	2021-22		2022-23		2023-24		2024-25		2025-26	
	Peak Count	Records	Peak Count	Records	Peak Count	Records	Peak Count	Records	Peak Count	Records
104	No data	No data	-	-	-	-	-	-	-	-
105	No data	No data	-	-	-	-	-	-	-	-
106	No data	No data	-	-	-	-	-	-	-	-
107	No data	No data	-	-	-	-	-	-	-	-
108	No data	No data	-	-	-	-	-	-	-	-

Table 6: Most recent five years of available WeBS data for Curlew at Gronant Fields by Parcel.

Parcel	2021-22		2022-23		2023-24		2024-25		2025-26	
	Peak Count	Records	Peak Count	Records	Peak Count	Records	Peak Count	Records	Peak Count	Records
91	No data	No data	-	-	-	-	-	-	-	-
92	No data	No data	-	-	5	1	-	-	2	1
93	No data	No data	3	1	-	-	-	-	-	-
94	No data	No data	-	-	-	-	-	-	-	-
95	No data	No data	5	4	2	1	-	-	3	1
96	No data	No data	-	-	-	-	-	-	-	-
97	No data	No data	6	1	2	2	-	-	-	-
98	No data	No data	-	-	4	2	-	-	-	-
99	No data	No data	-	-	-	-	-	-	-	-

Parcel	2021-22		2022-23		2023-24		2024-25		2025-26	
	Peak Count	Records	Peak Count	Records	Peak Count	Records	Peak Count	Records	Peak Count	Records
100	No data	No data	-	-	-	-	-	-	3	1
101	No data	No data	-	-	-	-	-	-	-	-
102	No data	No data	-	-	-	-	-	-	-	-
103	No data	No data	-	-	-	-	-	-	-	-
104	No data	No data	5	1	25	1	-	-	-	-
105	No data	No data	-	-	-	-	-	-	-	-
106	No data	No data	-	-	-	-	-	-	-	-
107	No data	No data	-	-	-	-	-	-	-	-
108	No data	No data	-	-	-	-	-	-	-	-

Table 7: Most recent five years of available WeBS data for Black-tailed Godwit at Gronant Fields by Parcel.

Parcel	2021-22		2022-23		2023-24		2024-25		2025-26	
	Peak Count	Records	Peak Count	Records	Peak Count	Records	Peak Count	Records	Peak Count	Records
91	No data	No data	-	-	-	-	-	-	-	-
92	No data	No data	-	-	-	-	-	-	-	-
93	No data	No data	-	-	-	-	-	-	-	-
94	No data	No data	-	-	-	-	-	-	-	-
95	No data	No data	10	1	-	-	-	-	-	-

Parcel	2021-22		2022-23		2023-24		2024-25		2025-26	
	Peak Count	Records	Peak Count	Records	Peak Count	Records	Peak Count	Records	Peak Count	Records
96	No data	No data	-	-	-	-	-	-	-	-
97	No data	No data	-	-	-	-	-	-	-	-
98	No data	No data	-	-	-	-	-	-	-	-
99	No data	No data	-	-	-	-	-	-	-	-
100	No data	No data	-	-	-	-	-	-	-	-
101	No data	No data	-	-	-	-	-	-	-	-
102	No data	No data	-	-	-	-	-	-	-	-
103	No data	No data	-	-	-	-	-	-	-	-
104	No data	No data	-	-	-	-	-	-	-	-
105	No data	No data	-	-	-	-	-	-	-	-
106	No data	No data	-	-	-	-	-	-	-	-
107	No data	No data	-	-	-	-	-	-	-	-
108	No data	No data	-	-	-	-	-	-	-	-

Appendix C Gronant Fields Environmental Appraisal

Prepared for:
Uniper UK Limited

Prepared by:
AECOM Limited

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1. Introduction

1.1 Overview

1.1.1 Uniper UK Limited (the 'Applicant') is seeking a Development Consent Order (DCO) for the construction, operation (including maintenance) and decommissioning of a proposed low carbon Combined Cycle Gas Turbine (CCGT) Generating Station fitted with Carbon Capture Plant (CCP) (the 'Connah's Quay Low Carbon Power Abated Generating Station') and supporting infrastructure in Flintshire, North Wales (referred to as the 'Proposed Development').

1.1.2 As part of the Connah's Quay Low Carbon Power project, off-site mitigation is required to address potential effects on qualifying features of the Dee Estuary Special Protection Area (SPA) and Ramsar site. Off-site habitat creation is also required to address a shortfall in habitat creation within the Order limits to deliver a Net-Benefit for Biodiversity (NBB) and associated mitigation strategies. These works are hereafter referred to as the 'Off-Site Mitigation Works'.

1.1.3 Gronant Fields, located to the east of Prestatyn within Denbighshire County (**Figure 1**), has been identified as suitable land to deliver this mitigation (hereafter referred to as the 'Gronant Fields site'). The Gronant Fields site forms part of the mitigation strategy for the Proposed Development and will be used to provide and maintain functional habitat for wintering Curlew associated with the Dee Estuary SPA /and Ramsar site. As part of the Off-Site Mitigation Works, low-intensity habitat creation, management is proposed within an existing agricultural landscape, with the aim of enhancing the ecological function of the Gronant Fields site.

1.1.4 This appendix provides an appraisal of the environmental effects and Habitats Regulations Assessment (HRA) implications (in the context of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (Ref 1) (the 'EIA Regulations') and Conservation of Habitats and Species Regulations 2017 (as amended) (Ref 2) (the 'Habitats Regulations') of the Off-Site Mitigation Works at the Gronant Fields site, as part of the Proposed Development. The purpose is to show that the **Environmental Statement (EN010166)** and **Report to Inform Habitats Regulations Assessment (EN010166/APP/6.13)** appropriately assess these works and demonstrate that no new or materially different likely significant environmental effects arise as a result of the Off-Site Mitigation Works, and therefore show there is no assessment gap.

1.2 Status and Securing of the Gronant Fields site

1.2.1 As explained in the **Applicant's Response to ExQ1 [REP3-059]**, the Applicant does not consider it to be necessary for the Off-Site Mitigation Works to be within the Order limits. This is because (i) no third-party land rights are required (the Applicant has already acquired the freehold to Gronant Fields) and (ii) pending detailed design, it is not yet certain that any activities at Gronant Fields would constitute development requiring planning permission and to the extent that such third party consents or permissions are required,

the Applicant is confident that these will be achievable before the relevant measures need to be delivered.

1.2.2 The Off-Site Mitigation Works form part of the overall mitigation strategy for the Proposed Development. Although located outside of the Order limits, these works are secured through the **Draft DCO (EN010166/APP/3.1)** via the **Off-site NBB and Green Infrastructure Strategy (EN010166/APP/6.14)**, which also secures the preparation, approval and implementation of a Landscape and Ecological Management Plan (LEMP) for the Gronant Fields site, as well as the **Outline Curlew Implementation and Monitoring Plan (EN010166/APP/6.13)**.

1.2.3 The LEMP required to be prepared and approved pursuant to the **Off-site NBB and Green Infrastructure Strategy (EN010166/APP/6.14)** secures the design, establishment, management, and monitoring of habitat creation and enhancement measures at the Gronant Fields site. This includes habitat measures which contribute to supporting qualifying features of the Dee Estuary SPA / Ramsar Site, as well as delivering Net Benefit for Biodiversity (NBB).

1.2.4 Accordingly, for the purposes of Environmental Impact Assessment (EIA) and HRA, the Off-Site Mitigation Works are treated as forming part of the Proposed Development, with the LEMP (secured through Requirement 18) and the Curlew Implementation and Monitoring Plan (secured through Schedule 16) of the **Draft DCO (EN010166/APP/3.1)**, providing the mechanism by which mitigation measures relied upon are implemented.

1.2.5 The **Outline Curlew Implementation and Monitoring Plan (EN010166/APP/6.13)** governs curlew-specific mitigation measures, including timing, management and monitoring requirements, while the LEMP governs the wider habitat creation and management measures. Where habitat measures contribute to both curlew mitigation and NBB objectives, they are secured through both mechanisms.

1.3 Legislative Context

Environmental Impact Assessment

1.3.1 Under the EIA Regulations (Ref 1), the Proposed Development has been subject to EIA. This appendix considers the Off-Site Mitigation Works at the Gronant Fields site as part of the Proposed Development for the purposes of EIA.

Habitats Regulations Assessment

1.3.2 The potential for effects on Habitats sites[1] is considered under the Habitats Regulations (Ref 2), which require a separate process of Habitats Regulations Assessment (HRA).

[1] Habitats sites comprise Special Protection Areas (SPAs) and Special Areas of Conservation (SACs), including candidate SACs or proposed SPAs. Under the Overarching National Policy Statement for Energy (EN-1), internationally designated Ramsar sites are to be treated in the same way as Habitats sites in terms of HRA. For the purposes of this report, 'Habitats sites' are taken to include Ramsar sites along with SACs and SPAs.

1.3.3 The Habitats Regulations transposed the land and marine aspects of the Habitats Directive (Council Directive 92/43/EEC) and certain elements of the Wild Birds Directive (Directive 2009/147/EC).

1.3.4 This appendix considers the Off-Site Mitigation Works at the Gronant Fields site as part of the Proposed Development for the purposes of HRA.

2. Description of the Gronant Fields site and Off-Site Mitigation Works

2.1 Site Description

2.1.1 The Gronant Fields site is located on the North Wales coast, east of Prestatyn, Denbighshire, and lies immediately inland of the Dee Estuary coastal margin and forms part of the wider estuarine landscape associated with the Dee Estuary (**Figure 1**). The Gronant Fields site is approximately 56.3 hectares (ha) and is bounded by linear infrastructure, including the North Wales Coast (railway) Line along its northern extent, Shore Road along the north-east, and Prestatyn Road along its southern extent. The Gronant Fields site and surrounding area are characterised by open, low-lying coastal farmland interspersed with drainage features and transport corridors. A description of the environmental context of the Gronant Fields site is provided in Section 3.

2.1.2 The Gronant Fields site is bordered by Flintshire County Council's administrative boundary at its eastern extent, which covers up to and including Shore Road until the northern extent of the railway bridge.

2.2 Off-Site Mitigation Works Description

2.2.1 Approximately 26 ha of the 56.3 ha Gronant Fields site will be subject to active habitat creation and management for curlew, with the remainder retained as supporting land enhanced for the purpose of delivering wider ecological benefits for qualifying features of the Dee Estuary SPA, Ramsar and SSSI site and to meet Net Benefit for Biodiversity (NBB) requirements. This is illustratively shown in **Figure 2**.

2.2.2 As set out in the **Outline Curlew Implementation and Monitoring Plan (EN010166/APP/6.13)**, the delivery of the offsetting areas and specific measures for curlew will be provided in phases. The initial phase is currently being enacted by the Applicant with the second phase subject to ongoing field investigation and monitoring.

2.2.3 The Off-Site Mitigation Works comprise a number of measures that collectively contribute to both curlew mitigation and NBB objectives which are secured through the appropriate DCO-controlled mechanisms, with habitat-related measures secured through both the LEMP (secured through Requirement 18) and Curlew Implementation and Monitoring Plan (secured through Schedule 16) of the **Draft DCO (EN010166/APP/3.1)**.

2.2.4 Any habitat creation for the purposes of NBB within the Gronant Fields site (e.g. woodland planting) would commence following the discharge of Requirement 18 of the **Draft DCO (EN010166/APP/3.1)**.

Phase 1 of Curlew measures

2.2.5 The initial works within the Gronant Fields site comprise the implementation of a suitable grazing / mowing regime to maintain an optimal sward height and required levels of ground disturbance to promote soil invertebrate abundance. Any management activities will be restricted for the full extent of the breeding season (typically March to August inclusive). In future years, low intensity

sheep / cattle grazing (within fenced areas and where appropriate) in autumn will provide the optimum conditions, however, where this is not possible, a further cut late in the season will be carried out to ensure that a sward height of no higher than 10 cm remains throughout the winter period.

2.2.6 Annual habitat management would be required for the Gronant Fields site to prevent overgrowth and ensure the habitats remain suitable.

Phase 2 of Curlew measures

2.2.7 In addition to the management of existing grassland, conversion of three fields of cultivated land to permanent wet grassland through the application of a suitable seed mix would be undertaken as an enhancement measure to the replacement Functionally Linked Land (FLL) created under phase 1. The enhancement strategy would take the form of either the creation of a network of linear foot drains, or the creation of shallow depressions (scrapes) within the Gronant Fields site. The final decision on the enhancement strategy would be decided by the Curlew Steering Group following consideration of the results of proposed ground water investigations within the Gronant Fields site.

2.2.8 Whilst there are two options available, it is considered that all of these would require a similar, minimal, level of intervention as they are predominantly a series of low-intensity earthwork-based activities to establish suitable habitat conditions. Following the earthworks activities, seeding mixes would be distributed in disturbed areas.

2.2.9 It is considered the works would require mechanical plant, such as an excavator and a dumper truck. Any site won materials would be re-utilised within the Gronant Fields site.

2.2.10 It is assumed that access for mechanical plant would be provided by the existing field accesses on Shore Road or Prestatyn Road (A548). Existing internal field accesses would be used to navigate within the Gronant Fields site between the different field parcels. Appropriate buffer zones would be applied from retained habitats and watercourses present within the Gronant Fields site to avoid disturbance.

On a worst case assumption, the phase 2 works would be completed within a four to six week period between May and September inclusive.

Habitat Creation to Deliver NBB

2.2.11 Habitat creation measures to deliver NBB comprise small—scale interventions, such as planting and localised habitat enhancement works, which would be undertaken by hand and do not require significant plant or earthworks.

Ongoing Ecological Management and Monitoring

2.2.12 Following initial works, ongoing ecological management and monitoring will comprise the implementation of a defined habitat management regime, overseen by the Curlew Steering Group.

2.2.13 Activities include:

- Vegetation and grassland management:

  - ongoing grassland management;
  - control of scrub or undesirable vegetation;
  - maintenance of open wet grassland habitat;
- Retention and management of features (existing ditches, hedgerows and small woodland areas, and ponds) to support habitat function; and
- Monitoring and adaptive management.

Decommissioning

2.2.14 The land would be managed until the Proposed Development is decommissioned and the 26 ha of FLL within the Order limits is reinstated to its existing or a materially similar condition that is suitable to function as FLL, unless otherwise agreed with Flintshire County Council in consultation with NRW. There will be no decommissioning phase because there will be no permanent structures or infrastructure requiring removal.

3. Environmental Baseline

3.1.1 The initial environmental baseline for the Gronant Fields site is summarised in **Table 1**, below. Proximities are recorded from the Gronant Fields site boundary, not the locations of the planned activities, shown in **Figure 2**.

3.1.2 An environmental constraints map is shown in **Figure 3**.

Table 1: Environmental Baseline

Environmental Topic Area	Designation / Constraint (Reference)	Environmental Constraints (Search Radii)
Land Use / Planning	Existing Land Use	The Gronant Fields site is currently agricultural and comprises predominantly open grassland fields. There is no permanent built development within the Gronant Fields site. The Gronant Fields site is owned by the Applicant and there is no public access across the land.
	Local Policy (Ref 7, Ref 8)	The Gronant Fields site lies within a locally designated Green Barrier (Policy RD 2). A land allocation for employment use (Policy PSE 2) is located approximately 40 m north of the Gronant Fields site, across the railway track at its north-western extent. The Gronant Fields site borders Flintshire, whose local development plan allocates the land to the east of the Gronant Fields site as Caravan Development in the Open Countryside (Policy PE13). The Gronant Fields site is adjacent to this allocation, which extends the length of Shore Road (including the car park adjacent to the Gronant Fields site).
Biodiversity and Nature Conservation	Statutory Ecological Designations (Ref 9 and Appendix B of the **Off-site Net Benefit for Biodiversity and Green Infrastructure Strategy (EN010166/APP/6.14)**)	The Gronant Fields site is located within 5 km of eight SSSI's, comprising: • The Dee Estuary SSSI, within which the Gronant Fields site is entirely located; • Gronant Dunes & Talacre Warren SSSI, which is adjacent to the east of the Gronant Fields site; • Prestatyn Hillside SSSI, which is located approximately 1.3 km south-west of the Gronant Fields site; • Teilia Quarry SSSI, which is located approximately 1.9 km south of the Gronant Fields site; • Graig Fawr SSSI, which is located approximately 3.1 km south-west of the Gronant Fields site;

Environmental Topic Area	Designation / Constraint (Reference)	Environmental Constraints (Search Radii)
		• Moel Hiraddug a Bryn Gop SSSI, which is located approximately 3.2 km south of the Gronant Fields site; • Maes Hiraddug SSSI, which is located approximately 4.1 km south-west of the Gronant Fields site; and • Glaswelltiroedd Trelogan / Trelogan Grasslands SSSI, which is located approximately 4.2 km south-east of the Gronant Fields site. The Gronant Fields site is located within 5 km of two SPAs, comprising: • The Dee Estuary SPA, within which the Gronant Fields site is entirely located; and • Liverpool Bay / Bae Lerpwl (Wales) SPA, which is located approximately 840 m north of the Gronant Fields site. The Gronant Fields site is located with 5 km of one SAC, the Dee Estuary SAC, which is adjacent to the north of the Gronant Fields site at its north-eastern extent. The Gronant Fields site is located within 5 km of one Ramsar site, the Dee Estuary (Wales), in which the Gronant Fields site is situated.
	Non-Statutory Ecological Designations (Ref 9 and Appendix B of the **Off-site Net Benefit for Biodiversity and Green Infrastructure Strategy (EN010166/APP/6.14)**)	The Gronant Fields site is located approximately 15 m south of Gronant Dunes, Local Nature Reserve (LNR), at its north-eastern extent, which lies across the North Wales Coast (railway) Line. There are no other LNR's within 2km of the Gronant Fields site. The Gronant Fields site is located within 2 km of two Regionally Important Geodiversity Sites (RIGS). These are:

Environmental Topic Area	Designation / Constraint (Reference)	Environmental Constraints (Search Radii)
		• RIGS ID 215, which is located approximately 875 m south-east of the Gronant Fields site; and • RIGS ID 119, which is located approximately 1.33 km south-west of the Gronant Fields site. The Gronant Fields site is located within 2 km of one Local Wildlife Site (LWS); Big Wood Pool, which is located approximately 935 m east of the Gronant Fields site.
	Habitats and Land-use (Ref 9 and Appendix B of the **Off-site Net Benefit for Biodiversity and Green Infrastructure Strategy (EN010166/APP/6.14)**)	The Gronant Fields site is predominantly comprised of neutral grassland with ditches, ponds and small areas of woodland and hedgerow. The woodland at the southern extent of the Gronant Fields site (Terfyn Covert) is partially classified as Ancient Woodland (restored). Woodland to the east of Nanat Hall, approximately 15 m south of the Gronant Fields site is also classified as Ancient Woodland (semi-natural). Refer to Appendix B of the **Off-site Net Benefit for Biodiversity and Green Infrastructure Strategy (EN010166/APP/6.14)** for further detail on the Preliminary Ecological Appraisal completed for the Gronant Fields site.
	Protected and Notable Species (Appendix B of the **Off-site Net Benefit for Biodiversity and Green Infrastructure Strategy (EN010166/APP/6.14)**)	As described in the Preliminary Ecological Appraisal (Appendix B of the **Off-site Net Benefit for Biodiversity and Green Infrastructure Strategy (EN010166/APP/6.14)**), the Gronant Fields site supports wintering Curlew, which are a qualifying feature of the Dee Estuary SPA and Ramsar site. In addition to Curlew, records of other protected and notable species including bats breeding / wintering birds occur within the wider surrounding area. Habitats present within the Gronant Fields site's surrounding area are suitable to support a range of protected and notable species, including: badger, bats, birds, great crested newt, and invertebrates.

Environmental Topic Area	Designation / Constraint (Reference)	Environmental Constraints (Search Radii)
Water Environment and Flood Risk	Watercourses (Ref 9)	As designated by Natural Resources Wales (NRW), there are three Main Rivers that lie within the Gronant Fields site, which are all inter-connected and link to other Main Rivers, including Prestatyn Gutter. The three within the Gronant Fields site are: • Nant Hall Drain, which intersects the central-western extent of the Gronant Fields site; • Terfyn Stream, which runs adjacent to the south-eastern boundary and runs through the centre of the Gronant Fields site; and • Nant Hall Drain Link, which intersects the central extent of the Gronant Fields site, linking Nant Hall drain to Terfyn Stream. There is network of existing agricultural ditches across the Gronant Fields site.
	Waterbodies (Ref 9)	One pond is present at Gronant Fields site to the west of the centre of the Gronant Fields site on Nant Hall Drain Link. One notable waterbody within 1 km of the Gronant Fields site is Little Pool Wood. The Gronant Fields site and its surrounds experience seasonally wet conditions.
	Hydrogeology and Drainage (Ref 10, Ref 11)	The Gronant Fields site is drained by a network of connected Main Rivers and ditches, as described above. The bedrock geology beneath the majority of the Gronant Fields site is Bowland Shale Formation (mudstone), which is classified as secondary (undifferentiated) aquifer. The bedrock geology beneath north-western extent of the Gronant Fields site is Pennine Coal Measures Group (sedimentary rock cycles, coal measure type), which is classified as secondary A aquifer. A section of the south-eastern / central

Environmental Topic Area	Designation / Constraint (Reference)	Environmental Constraints (Search Radii)
		extent of the Gronant Fields site has Pentre Chert Formation (chert, bedrock geology), which is classified as secondary A aquifer. The superficial geology beneath the majority of the Gronant Fields site is Peat, which is classified as unproductive aquifer. Other superficial deposits beneath the Gronant Fields site include Blown Sand (secondary A aquifer), at the northern extent of the Gronant Fields site, Tidal Flat Deposits, at the eastern extent of the Gronant Fields site (secondary (undifferentiated) aquifer), and Till, Devensian-Diamicton (secondary (undifferentiated) aquifer), at the southern extent of the Gronant Fields site. The Gronant Fields site is a low-lying coastal parcel with heavy / poorly draining soils.
	Flood Risk (Ref 12)	The Gronant Fields site is largely within Flood Zone 3 of NRW's Flood Map for Planning: Rivers and Sea, except for the south-western corner. The majority of the Gronant Fields site is within a TAN 15 Defended Zone (Rhyl Prestatyn), meaning the Gronant Fields site is at risk of coastal flooding, however it is currently protected by flood defences. The majority of the Gronant Fields site does not fall within a Flood Zone of NRW's Flood Map for Planning: Surface Watercourses and Small Watercourses, but some areas do fall within Flood Zone 2, with intermittent parcels of land within Flood Zone 3, following the drainage ditch channels.
Landscape and Visual Environment	Landscape Designations (Ref 9)	There are no National Parks within 5 km of the Gronant Fields site.

Environmental Topic Area	Designation / Constraint (Reference)	Environmental Constraints (Search Radii)
		The Gronant Fields site is located approximately 85 m north of the Clwydian Range and Dee Valley Area of Outstanding Natural Beauty (AONB). No other AONBs are located within 5 km of the Gronant Fields site. There are no Special Landscape Areas (SLAs) within 5 km of the Gronant Fields site.
	Landscape Character (Ref 13)	NRWs LANDMAP Visual and Sensory data identifies the Gronant Fields site as forming part of the 'Coastal Farmland – Gronant' landscape, characterized by flat, low-lying coastal levels comprising open and exposed agricultural land with a regular field pattern defined by drainage ditches. The landscape is large-scale and uniform in character, with limited enclosure and occasional wetland features.
	Visual Receptors (Ref 14)	The Gronant Fields site is bounded by linear infrastructure, including the North Wales Coast (railway) Line along its northern extent, Shore Road along the north-east, and Prestatyn Road along its southern extent. Nant Hall is adjacent to the Gronant Fields site at its south-western extent. There are several other residential, commercial, and recreational land uses nearby. These closest include: • Numerous commercial properties located approximately 40 m north of the Gronant Fields site at its north-western extent, across the railway, including Caravans for Sale in North Wales, Childline, HCA Healthcare, and Caravan Transport UK; • Prestatyn Golf Club, which is located approximately 50 m north of the Gronant Fields site at its central extent, across the railway; • Greenacres Caravan Park, which is located approximately 25 m east of the Gronant Fields site, at its north-eastern extent; and • Coed Bell Cemetery, which is located approximately 100 m south of the Gronant Fields site.

Environmental Topic Area	Designation / Constraint (Reference)	Environmental Constraints (Search Radii)
		The Gronant Fields site is adjacent to a Public Right of Way (PRoW) (205 27), which runs along its western boundary. There is a PRoW (205 5) located approximately 15 m south of the Gronant Fields site, across Prestatyn Road.
Historic Environment	Designated Heritage Assets (Ref 15)	There are no Registered Parks and Gardens, Protected Wrecks or Registered Historic Landscapes within 500 m of the Gronant Fields site. A review of Cof Cymru indicates that eight Listed Buildings are located within 1 km of the Gronant Fields site. The closest is Nant Hall Hotel (Grade II), located approximately 25 m to the south. Two Scheduled Monuments are located within 1 km of the Gronant Fields site, the closest being Prestatyn Castle, located approximately 510 m to the east.
	Non-Designated Heritage Assets (Ref 18)	There is a singular asset recorded on the HER within the Gronant Fields site, towards the western extent. This comprises a buried prehistoric soil horizon which was identified during archaeological surveys to support a planning application in 1994.
	Archaeological Potential	The Gronant Fields site comprises low-lying coastal land which is likely to have been historically reclaimed for agricultural use. Underlying this reclaimed land there is the potential for alluvial and peat deposits which could comprise palaeoenvironmental evidence. The wider area has evidence of prehistoric, Roman and medieval archaeological activity associated with coastal settlement and land use. As such, there is potential for previously unrecorded archaeological remains within the Gronant Fields site.
	Geology and Soils	This baseline is covered in the 'Hydrogeology and Drainage' row. In summary, the Gronant Fields site is underlain by superficial coastal and alluvial deposits including

Environmental Topic Area	Designation / Constraint (Reference)	Environmental Constraints (Search Radii)
Soils, Geology and Land Quality		extensive peat deposits, among other superficial deposits. Soils are typically heavy and poorly drained.
	Agricultural Land Classification (Ref 19)	Agricultural Land Classification mapping indicates that the Gronant Fields site comprises predominantly Grade 3a agricultural land, which represents good quality agricultural land and falls within the definition of Best and Most Versatile (BMV) agricultural land.
	Contaminated Land (Ref 20, Ref 21)	The Gronant Fields site has been in agricultural use since at least the late 1800s, with no evidence of potentially contaminative land uses. There are no known sources of contamination within the Gronant Fields site, and land quality is considered typical of agricultural land. A review of available unexploded ordnance (UXO) mapping indicates that the Gronant Fields site is located within a low risk area.
Population and Human Health	Nearby Receptors	The Gronant Fields site is a predominantly rural area with a limited amount of nearby residential receptors. The closest receptor is Nant Hall Hotel, which is located approximately 15 m south of the Gronant Fields site. Numerous recreational and commercial properties are nearby, including caravan parks adjacent to the west of the Gronant Fields site and the golf course north of the Gronant Fields site.
	Public Access and Recreation (Ref 14)	There is no public access within the Gronant Fields site. PRoW 205 27 runs along the western boundary of the Gronant Fields site and PRoW 205 5 is located south of the Gronant Fields site, across Prestatyn Road.
Traffic and Transport	Local Highway Network	The Gronant Fields site is accessible via Prestatyn Road to the south and Shore Road to the east.
Noise and Vibration / Air Quality	Sensitive Receptors	Sensitive receptors include nearby residential properties, Nant Hall, and other land uses within 50 m to 100 m of the Gronant Fields site, such as the Greenacres Caravan park and Presthaven Sands.

Environmental Topic Area	Designation / Constraint (Reference)	Environmental Constraints (Search Radii)
	Existing Noise / Air Quality Environment	The Gronant Fields site's noise and air quality environment is influenced by existing transport infrastructure, including the North Wales Coast (railway) Line and surrounding road network.
Climate Change	Climate Vulnerability	The Gronant Fields site is low-lying and located within an area identified as being at risk of coastal flooding.
	Carbon and Climate Resilience Context	The Off-Site Mitigation Works involve low-intensity land management activities and do not introduce significant sources of greenhouse gas emissions. The creation of wetter grassland habitat is consistent with climate resilience objectives.
Cumulative Effects	Other Relevant Developments (Ref 15, Ref 16)	The Gronant Fields site forms part of the wider mitigation strategy associated with the Proposed Development, however, there is no potential for significant cumulative effects when considered collectively. No other developments have been identified with relation to the Off-Site Mitigation Works.

4. Planning Context

4.1 Review of Planning History

4.1.1 The Gronant Fields site is not allocated for development within the Denbighshire County Council Adopted Local Development Plan (LDP) (Ref 7), nor is the Gronant Fields site subject to any planning applications.

4.1.2 Existing above ground infrastructure is limited to an overhead telephone line, with several connecting posts; a gravel track leading to an approximate 320 m^2 concrete base at the southern extent of the Gronant Fields site; and an overgrown track at the eastern extent of the Gronant Fields site.

4.1.3 Existing below ground infrastructure is limited to an intermediate pressure pipeline that runs across the northern extent of the Gronant Fields site.

4.2 Relevant Planning Policy

4.2.1 The Gronant Fields site lies within a locally designated Green Barrier (Policy RD 2), which seeks to prevent the coalescence of settlements and to maintain the open character of land (Ref 7).

4.2.2 At a national level, planning policy is set out in Planning Policy Wales (Ref 22), which promotes the protection and enhancement of biodiversity and the sustainable management of natural resources. Technical Advice Note 15 (Development, Flooding and Coastal Erosion) is also relevant given the Gronant Fields site's location within areas at risk of flooding, as identified by the Natural Resources Wales Flood Map for Planning (Ref 12, Ref 23).

4.2.3 Policies relating to the protection of internationally and nationally designated ecological sites are also relevant, reflecting the Gronant Fields site's location within the Dee Estuary SPA, Ramsar site and SSSI.

4.2.4 A land allocation for employment use (Policy PSE 2) is located approximately 40 m north of the Gronant Fields site, across the railway track at its north-western extent.

4.2.5 The Gronant Fields site borders Flintshire, whose local development plan allocates the land to the east of the Gronant Fields site as Caravan Development in the Open Countryside (Policy PE13). The Gronant Fields site is adjacent to this allocation, which extends the length of Shore Road (including the car park adjacent to the Gronant Fields site).

5. Consideration of Likely Significant Effects

5.1 Overview

5.1.1 The purpose of this section is to demonstrate that the inclusion of the Off-Site Mitigation Works at the Gronant Fields site, as described in Section 2, does not result in any new or materially different likely significant effects compared with those assessed in the **Environmental Statement (EN010166)** and **Report to Inform Habitats Regulations Assessment (EN010166/APP/6.13)**, with all works at the Gronant Fields site are considered.

5.2 Approach to Assessment

5.2.1 The assessment has been undertaken by reference to topics and impact pathways assessed within the **Environmental Statement (EN010166)**, considering whether the Off-Site Mitigation Works introduce new impact pathways or materially change the nature of effects.

5.3 Topic-based Appraisal of Effects

Characteristics of the Off-Site Mitigation Works

5.3.1 The Off-Site Mitigation Works, as described in Section 2 of this appendix, are inherently reversible and adaptive, with the Gronant Fields site intended to be managed under the guidance of the Curlew Steering Group until the Connah's Quay Low Carbon Power project is decommissioned as described.

5.3.2 Overall, the characteristics of the Off-Site Mitigation Works indicate a low magnitude of change, with activities consistent with typical land management practices.

Location of the Off-Site Mitigation Works

5.3.3 The Gronant Fields site is located within a sensitive environmental context, namely being within the Dee Estuary SPA, Ramsar site and SSSI. The land is already an undeveloped, agricultural landscape.

5.3.4 The Off-Site Mitigation Works are consistent with the Gronant Fields site's existing agricultural context; designed to specifically deliver ecological mitigation and enhancement, including the creation and management of suitable habitat for wintering Curlew and NBB.

5.3.5 The Gronant Fields site is not located within areas of high population density, nor does it contain any residential or other sensitive human receptors. The surrounding land uses are predominantly rural and include existing infrastructure such as transport routes.

Potential for Likely Significant Effects

Biodiversity and Nature Conservation

5.3.6 Phase 1 measures comprise the implementation of a managed grazing and / or mowing regime to achieve the appropriate sward height and ground condition. This is consistent with established agricultural land management practices and do not involve construction activities or disturbance beyond baseline conditions set out in the above sections. No reduction in habitat extent within designated sites is expected.

5.3.7 Phase 2 measures comprise numerous activities, including localised earthworks to create shallow scrapes or drainage features, hydrological enhancements and the establishment of wet grassland habitats. Potential disturbance during initial works is limited in scale and duration and will be controlled by embedded design and management measures, such as the maintenance of buffers from sensitive ecological features. Ongoing activities comprise routine land management consistent with existing agricultural practices.

5.3.8 Potential disturbances, whilst limited in scale and disturbance, are controlled through measures secured through the **Draft DCO (EN010166/APP/3.1)**, including the **Outline Curlew Implementation and Monitoring Plan (EN010166/APP/6.13)** secured through Schedule 16 and, where relevant, the LEMP required by the **Off-Site Net Benefit for Biodiversity and Green Infrastructure Strategy (EN010166/APP/6.14)** secured in Requirement 18.

5.3.9 Following implementation, management comprises routine habitat management practices, such as vegetation control and monitoring, consistent with the intended ecological function of the Gronant Fields site and would not give rise to significant adverse effects, instead maintaining and enhancing habitat suitability for qualifying species.

5.3.10 Therefore, the Off-Site Mitigation Works would not give rise to any new or materially different likely significant effects on biodiversity and nature conservation receptors.

Water Environment and Flood Risk

5.3.11 The Gronant Fields site lies within Flood Zone 3 and is characterised by a network of Main Rivers, ditches and seasonally wet ground, forming part of an already managed floodplain system.

5.3.12 Phase 1 measures do not involve earthworks or changes to drainage patterns and therefore do not introduce pathways for effects on the water environment.

5.3.13 Phase 2 measures include localised earthworks and hydrological enhancements to support wet grassland habitat. These works are limited in scale and extent are undertaken within the existing hydrological regime.

5.3.14 Habitat creation to deliver NBB does not involve significant plant or earthworks and does not introduce additional pathways for effects.

5.3.15 The works do not include large-scale regrading, or the introduction of impermeable surfaces, and there is no evidence that they would materially alter flood storage capacity, interrupt flow pathways, or increase flood risk elsewhere.

5.3.16 Given the scale and nature of the works, any potential effects on the water environment would be limited, localised and temporary. Activities undertaken in proximity to Main Rivers or drainage features would be subject to regulatory controls, including Flood Risk Activity Permits and Land Drainage Consents where required.

5.3.17 These controls govern the manner in which works are undertaken but are not relied upon to mitigate significant effects, as no pathway for materially significant change to hydrological processes or flood risk behavior has been identified.

5.3.18 As such, the Off-Site Mitigation Works would not give rise to any new or materially different likely significant effects on the water environment or flood risk.

Landscape and Visual Environment

5.3.19 Maintenance operations are routine activities and are already undertaken within the Gronant Fields site and are consistent with the existing agricultural land use.

5.3.20 Whilst earthworks activities could be present within the landscape for a short term, they are not considered to be of a scale and nature to have the potential to result in significant effects on landscape and visual amenity.

5.3.21 The Gronant Fields site forms part of a flat, open coastal agricultural landscape characterised by grazing land and drainage features. The Off-Site Mitigation Works do not introduce built development or alter the underlying field structure.

5.3.22 Habitat creation measures are small-scale and consistent with the existing land-use and character.

5.3.23 The Off-Site Mitigation Works would not materially alter landscape or visual amenity and no likely significant effects are anticipated.

Historic Environment

5.3.24 The Gronant Fields site comprises predominantly reclaimed coastal agricultural land with the potential for underlying alluvial and peat deposits of paleoenvironmental interests.

5.3.25 While the surrounding area has high archaeological potential, particularly associated with prehistoric, Roman and medieval activity, the depth of made ground and reclamation deposits is likely to limit the direct impacts of the Off-Site Mitigation Works on any potential remains.

5.3.26 Given the nature of the Off-Site Mitigation Works, significant effects on archaeological receptors are not likely, particularly because any potential assets are expected to be deeply buried beneath reclaimed deposits.

5.3.27 Appropriate mitigation, such as targeted investigation and / or archaeological monitoring during construction, can be secured through standard planning controls, further reducing the potential for significant effects.

Soils, Geology and Land Quality

5.3.28 The Off-Site Mitigation Works involve minor and localised disturbance of soils, including in areas of where peat could be present. Excavated material will be reused on-site and there is no requirement for disposal or import of material.

5.3.29 The land-use will remain as habitat management and will not result in the loss of soil function. No contaminated land issues or significant hazards have been identified.

5.3.30 Potential effects on soils, geology and land quality would be limited by the small-scale and localised nature of the works, with any necessary measures to control any impacts as outlined in Section 6.3 of the **Outline Curlew Implementation and Monitoring Plan (EN010166/APP/6.13)** secured through Schedule 16 of the **Draft DCO (EN010166/APP/3.1)**.

5.3.31 Following the establishment of the habitats, the Gronant Fields site can continue to be grazed and, therefore, would remain in agricultural use.

5.3.32 No significant effects would arise.

Traffic and Transport

5.3.33 There would be very limited additional vehicle movements required during periods of maintenance and during any future earthworks. These movements would be infrequent and negligible in the context of baseline traffic flows on the surrounding road network. Any plant arriving on Gronant Fields site would utilise existing site accesses on Prestatyn Road and Shore Road. No significant effects on traffic and transport would arise.

Noise and Vibration

5.3.34 Maintenance operations are routine activities and are already undertaken within the Gronant Fields site. These activities are short term in nature and do not have the potential to result in significant effects on nearby noise sensitive receptors.

5.3.35 Whilst earthworks activities could generate additional noise beyond existing maintenance activities, works would be short-term and limited in scale; given the nature of activities and existing baseline conditions.

5.3.36 Considering this and the short term duration of any such activities and the location of these well within the Gronant Fields site, there is no potential for significant effects on nearby noise sensitive receptors.

5.3.37 Notwithstanding the above, the works would be undertaken in accordance with relevant best practices as outlined in Section 6.3 of the **Outline Curlew Implementation and Monitoring Plan (EN010166/APP/6.13)** secured through Schedule 16 of the **Draft DCO (EN010166/APP/3.1)**, to ensure noise from activities on Gronant Fields site is minimised.

Air Quality (including dust)

5.3.38 Maintenance operations are routine activities and are already undertaken within the Gronant Fields site. These activities are short term in nature and do not have the potential to result in significant effects on nearby sensitive receptors.

5.3.39 These Off-Site Mitigation Works would also be short term in nature and do not have the potential to result in significant effects on ecological and human health receptors following implementation of best practice measures as outlined in Section 6.3 of the **Outline Curlew Implementation and Monitoring Plan (EN010166/APP/6.13)** secured through Schedule 16 of the **Draft DCO (EN010166/APP/3.1)**.

Population and Human Health

5.3.40 The Off-Site Mitigation Works will not introduce any new sources of pollution or risk and there is not considered to be any risks introduced in relation to noise and vibration and air quality as set out above. The Gronant Fields site is not publicly accessible and nearby receptors are limited. Accordingly, it is not anticipated that any significant effects on population and human health are likely to arise.

Climate Change

5.3.41 The Off-Site Mitigation Works would inevitably result in some greenhouse gas (GHG) emissions during construction. Primary emission sources would include energy consumption of plant and vehicles and subsequent management activities. These activities would be in keeping with baseline activities within the Gronant Fields site and therefore no significant adverse effects associated with GHG emissions would arise.

5.3.42 Given that the underlying geology of the Gronant Fields site is formed largely of peat deposits, the Off-Site Mitigation Works are likely to protect and enhance the condition of these deposits, helping to maintain any carbon stocks stored within them as well as enhancing their potential for future carbon sequestration. Therefore, no significant GHG effects are considered likely.

5.3.43 No likely significant adverse effects due to climate change resilience and in-combination climate impacts have been identified on the basis the intended aims are to create a wetter site.

Materials and Waste

5.3.44 The Off-Site Mitigation Works would require minimal material inputs. Minor earthworks would utilise site won material, which will be retained and re-used within the Gronant Fields site to form habitat features.

5.3.45 Waste generation during phase 1 will be negligible and limited to small quantities of incidental construction and packaging waste. These would be managed in accordance with good practice and relevant waste management legislation as outlined in Section 6.3 of the **Outline Curlew Implementation and Monitoring Plan (EN010166/APP/6.13)** secured through Schedule 16 of the **Draft DCO (EN010166/APP/3.1)**. Phase 2 activities would not generate waste beyond that of the current land use.

5.3.46 There are no hazardous materials associated with the Off-Site Mitigation Works, and no processes that would give rise to significant waste streams. No off-site disposal of materials is anticipated.

5.3.47 There is no potential for likely significant effects in relation to materials and waste.

Major Accidents

5.3.48 No risks of major accidents or disasters, including those related to natural hazards or unexploded ordnance, have been identified.

Cumulative Effects

5.3.49 When considering the context of other existing and approved development, the Off-Site Mitigation Works form part of the off-site ecological mitigation strategy for the Connah's Quay Low Carbon Power project. They are specifically intended to maintain and enhance habitat conditions within land designated as The Dee Estuary SPA / Ramsar site / SSSI.

5.3.50 There would be no significant introduction of additional sources of disturbance, emissions, or hydrological change. Instead, they provide habitat enhancement and improved ecological functionality.

5.3.51 Accordingly, the Off-Site Mitigation Works do not combine with other development to give rise to new or intensified impact pathways, and no likely significant cumulative effects are identified.

6. HRA Considerations

6.1 Overview

6.1.1 This section considers the Off-Site Mitigation Works in the context of the HRA Regulations and demonstrates that there would be no changes to the conclusions of the **Report to Inform Habitats Regulations Assessment (EN010166/APP/6.12)** when they are considered as part of the Proposed Development.

6.2 Relevant Habitats Sites

6.2.1 As identified in Section 3, the Habitats sites relevant to the assessment of the Off-Site Mitigation Works are:

- Dee Estuary SPA, within which the Gronant Fields site is entirely located;
- Dee Estuary SAC, adjacent to the north of the Gronant Fields site at its closest point;
- The Dee Estuary Ramsar within which the Gronant Fields site is entirely located; and
- Liverpool Bay / Bae Lerpwl (Wales) SPA, which is located approximately 840 m north of the Gronant Fields site.

6.2.2 Because the above distances are measured between the closest point of the Gronant Fields site boundary and the boundary of each Habitats site, distances from each Habitats site to specific activities, e.g. excavation, are likely to be greater than those stated above. The distances stated are, therefore, considered to represent a precautionary approach.

6.3 Potential Effects

6.3.1 It is considered that the potential effect pathways from the Off-Site Mitigation Works on qualifying features of Habitats sites are:

- Direct terrestrial habitat loss;
- Alteration of local hydrology and hydrogeology including potential effects on terrestrial water quality;
- Potential for noise and visual disturbance during construction; and
- Potential exposure from changes in air quality and the generation of dust during the proposed works on sensitive habitats and species.

6.3.2 The following effect pathways are not considered relevant to the Off-Site Mitigation Works.

- increased recreational pressure – as there is no public access to the Gronant Fields site or is increased accessed provision proposed; and
- physical interaction – as there is no permanent infrastructure within the Off-Site Mitigation Works.

6.4 Assessment

Direct terrestrial habitat loss

6.4.1 Whilst the Off-Site Mitigation Works are located within the Dee Estuary SPA and the Dee Estuary Ramsar sites, the Off-Site Mitigation Works are for habitat enhancement and would not result in any loss of the area of available habitat within each of these sites, and an improvement in habitat quality, since this is the purpose of the Off-Site Mitigation Works.

6.4.2 The Gronant Fields site does not overlap the Dee Estuary SAC or Liverpool Bay / Bae Lerpwl (Wales) SPA and there would be no removal of designated habitats within these sites.

6.4.3 For these reasons there it can be concluded that no likely significant effects would arise on either the Dee Estuary SPA and Ramsar site and the Dee Estuary SAC or Liverpool Bay / Bae Lerpwl (Wales) SPA.

Alteration of local hydrology and hydrogeology including potential effects on terrestrial water quality

6.4.4 No works would take place within the Dee Estuary SAC or Liverpool Bay / Bae Lerpwl (Wales) SPA.

6.4.5 The Off-Site Mitigation Works within the Dee Estuary SPA and Ramsar site would not require any dewatering of groundwater or surface water. The Off-Site Mitigation Works would be designed to function within the existing hydrological regime, maintain the regional and local groundwater flow gradients and not to create a barrier to groundwater or surface water flows.

6.4.6 The Off-Site Mitigation Works would be undertaken following best practice and would apply standard measures required regardless of their location (as detailed in the **Outline Curlew Implementation and Monitoring Plan (EN010166/APP/6.13)**). These would minimise the potential for spills and ensure appropriate equipment is in place should a spill arise on site.

6.4.7 For these reasons it can be concluded that no likely significant effects would arise on any of the relevant Habitats sites.

Potential for noise and visual disturbance during construction

6.4.8 Habitat management using mechanised plant (e.g. tractors and mowing equipment) is part of standard management of habitat and the type of plant involved in the enhancement works is likely to have a similar noise profile. If noisy plant were required, works associated with phase 2 curlew measures (enhancement strategy). Therefore, likely significant effects regarding noise and visual disturbance in the Dee Estuary SPA / Ramsar site and in close proximity to the Liverpool Bay / Bae Lerpwl (Wales) SPA during phase 2 works cannot be excluded.

6.4.9 The mitigation for any potential effects would be undertaken outside the wintering period and would be limited to , the full extent of the breeding season (typically March to August inclusive)to minimise potential for conflict with

nesting birds. This mitigation would be secured by Curlew Implementation and Monitoring Plan, via Schedule 16 of the **Draft DCO (EN010166/APP/3.1)**.

6.4.10 For this reason, there would be no adverse effects on integrity on the qualifying features of any of the Dee Estuary SPA / Ramsar site or Liverpool Bay / Bae Lerpwl (Wales) SPA.

Potential exposure from changes in air quality and the generation of dust during the proposed works on sensitive habitats and species.

6.4.11 Combustion emissions could arise through the use of construction plant and construction vehicles. Effects associated with construction emissions would be reduced the further away from the source the receptor is located.

6.4.12 Dust-generating activities include earthworks and management of excavated materials. Secondary dust effects can result from 'trackout', i.e. mud and debris from construction vehicles as they access public roads.

6.4.13 The Off-Site Mitigation Works would likely be undertaken within a period of less than four weeks and would require minimal plant and would be undertaken following best practice and would apply standard measures required regardless of their location (as detailed in the **Outline Curlew Implementation and Monitoring Plan (EN010166/APP/6.13)**). For these reasons there would be no adverse effect on integrity on the Dee Estuary SAC / SPA and Ramsar site.

6.5 Conclusions

6.5.1 This section demonstrates that given the small scale nature of the Off-Site Mitigation Works and the ability to time these works to avoid the over-wintering period, there is no potential for adverse effects on integrity on the qualifying features of any of the relevant Habitats site.

6.5.2 Should it be determined that planning permission is required for any phase 2 works, any planning application would be supported by a Report to Inform HRA.

7. Other Consents and Licenses

7.1 Overview

7.1.1 This document provides details on additional consents, licences, and permits that the Applicant may need to obtain to enact the Off-Site Mitigation Works. These are not secured through, or proposed to be consented by, the DCO.

7.1.2 It is separated to consider phase 1 and phase 2 works in isolation.

Phase 1 curlew measures

7.1.3 The following additional consents, licences, and permits are considered to be required for the phase 1 works:

- SSSI assent/consent for installation of groundwater monitoring equipment pursuant to the Wildlife and Countryside Act 1981.

Phase 2 curlew measures

7.1.4 The following additional consents, licences, and permits are considered to be required for the phase 2 works:

- Environmental Permit (Flood Risk Activities) - Required for works in close proximity to Main Rivers and flood defences.
- Land Drainage Consent - Required for works affecting the flow in ordinary watercourses or any relevant byelaws determined by the Lead Local Flood Authority or Internal Drainage Board.
- Protected species licence - If future surveys identify any protected species, an application will be made for a protected species licence prior to the commencement of the works.
- Potential need for planning permission under the Town and Country Planning Act 1990.
- SSSI assent/consent pursuant to the Wildlife and Countryside Act 1981.

8. Conclusion

8.1.1 This Report provides a brief description of the Off-Site Mitigation Works and has considered:

- the potential for likely significant effects on the environment in line with the EIA Regulations;
- the potential for adverse effects on integrity of Habitats sites in line with the Habitats Regulations; and
- the requirement for other consents, licences and agreements.

8.1.2 A review of the potential environmental effects of the Off-Site Mitigation Works concludes that there will be no new or materially different likely significant effects compared to those presented in the **Environmental Statement (EN010166/APP/6.1-6.4)** or changes to the conclusions of the **RIHRA (EN010166/APP/6.12)** as a result of such works

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Abbreviations

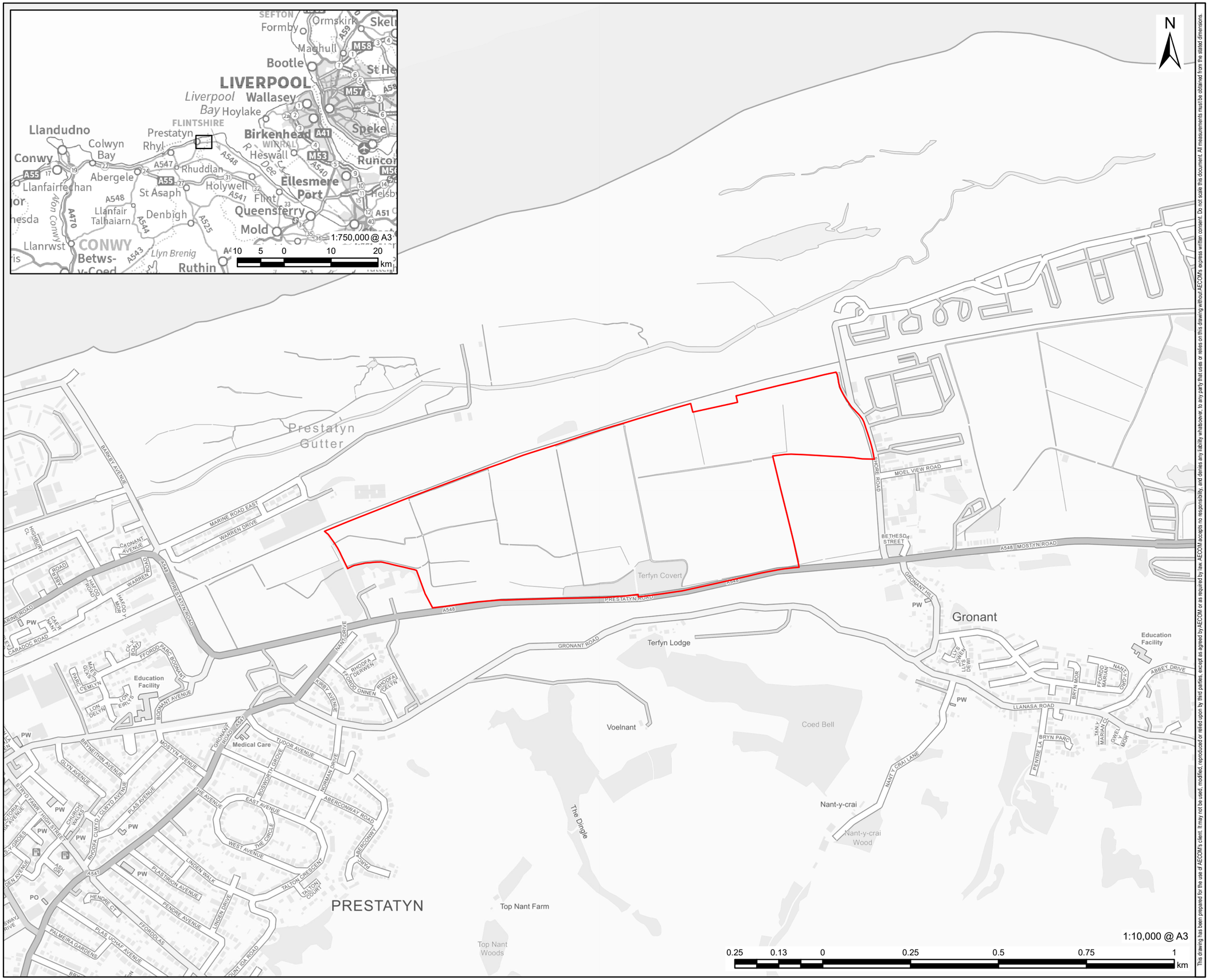
Term	Definition
ALC	Agricultural Land Classification
AONB	Area of Outstanding Natural Beauty
BMV	Best and Most Versatile (agricultural land)
CCP	Carbon Capture Plant
CCGT	Combined Cycle Gas Turbine
CEMP	Construction Environmental Management Plan
DCO	Development Consent Order
EIA	Environmental Impact Assessment
FCC	Flintshire County Council
FLL	Functional Linked Land
GHG	Greenhouse Gas
ha	hectare
HER	Historic Environment Record
HRA	Habitats Regulations Assessment
LDP	Local Development Plan
LNR	Local Nature Reserve
LSE	Likely Significant Effect
LWS	Local Wildlife Site
NBB	Net Benefit for Biodiversity
NRW	Natural Resources Wales
PEA	Preliminary Ecological Appraisal
PPG	Planning Practice Guidance
PRoW	Public Right of Way
Ramsar	Wetlands of International Importance (Ramsar Convention)
RIGS	Regionally Important Geodiversity Site
SAC	Special Area of Conservation
SLA	Special Landscape Area
SPA	Special Protection Area
SSSI	Site of Special Scientific Interest
TAN	Technical Advice Note
UXO	Unexploded Ordnance

Annex A: Figures

Fig 1: Site Boundary
Fig 2: Indicative Landscape Plan
Fig 3: Environmental Constraints Plan

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LEGEND

Site Boundary

NOTES

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DATE

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FIGURE TITLE

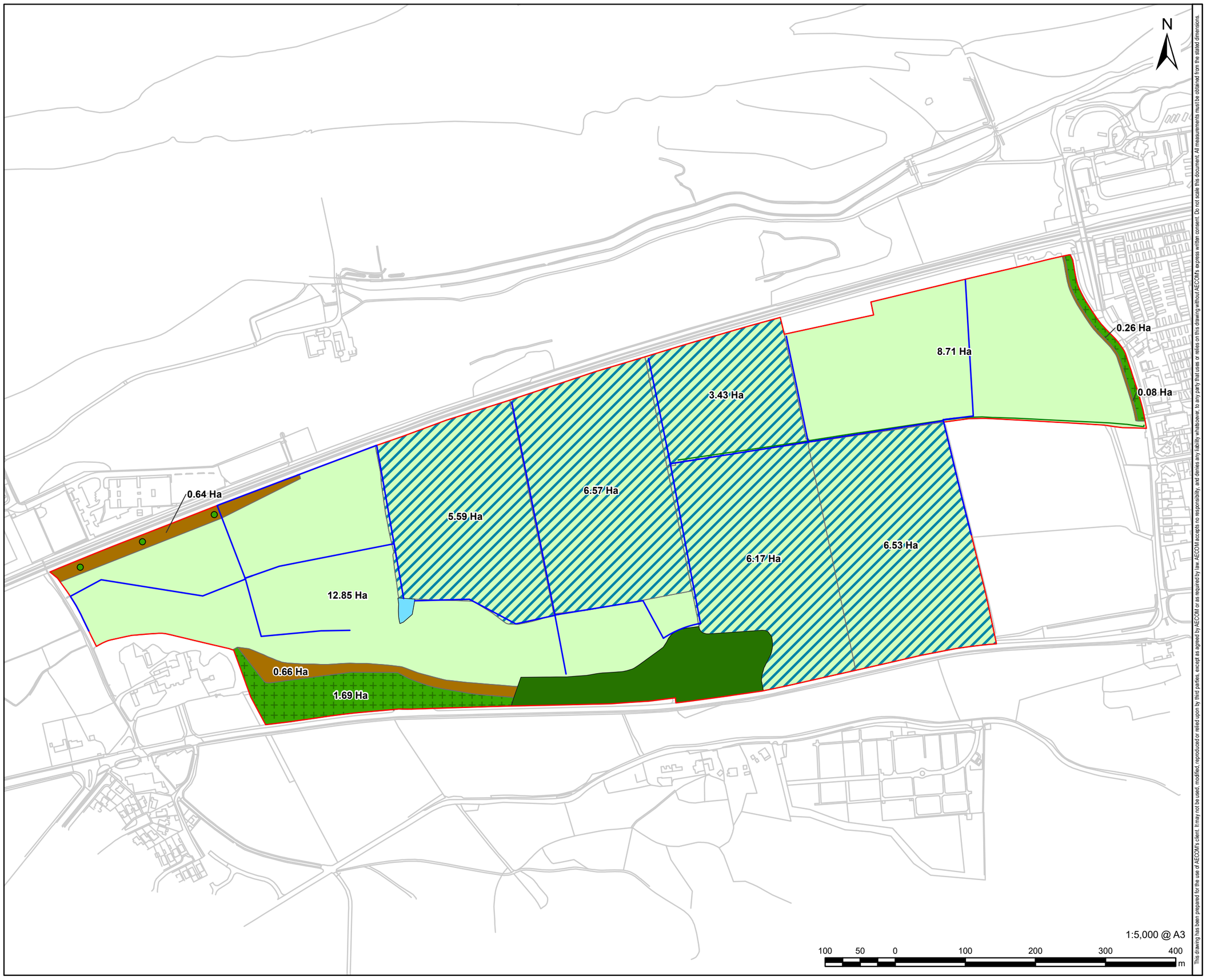
Site Boundary

FIGURE NUMBER

Figure 1

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LEGEND

- Site Boundary

Indicative Landscape Plan

- Individual Tree
- Grass
- Wet Grass
- Scrub
- Woodland

Retained Habitat

- h2a6 - Other Native Hedgerow
- r2b - Other Rivers and Streams
- r1a - Eutrophic Standing Waters
- w1g - Other Broadleaved Woodland

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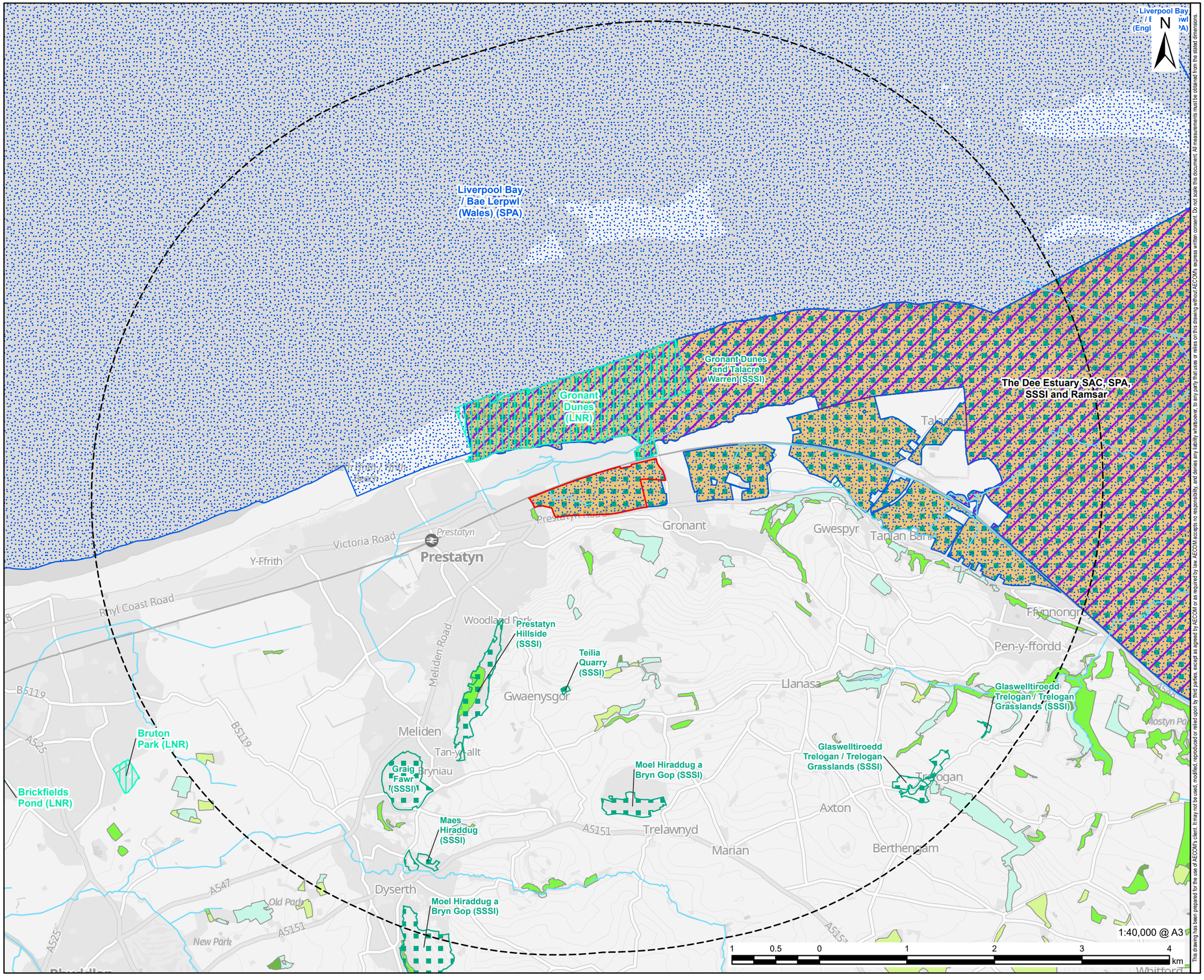
Indicative Landscape Plan

FIGURE NUMBER

Figure 2

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LEGEND

- Site Boundary
- 5km Buffer of the Site Boundary
- Surface Watercourse
- Local Nature Reserve (LNR)
- Special Protection Area (SPA)
- Special Area of Conservation (SAC)
- Site of Special Scientific Interest (SSSI)
- Ramsar

Ancient Woodland

- Ancient Semi Natural Woodland
- Ancient Woodland Site of Unknown Category
- Plantation on Ancient Woodland Site
- Restored Ancient Woodland Site

NOTES

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FIGURE TITLE

Environmental Constraints - Ecology

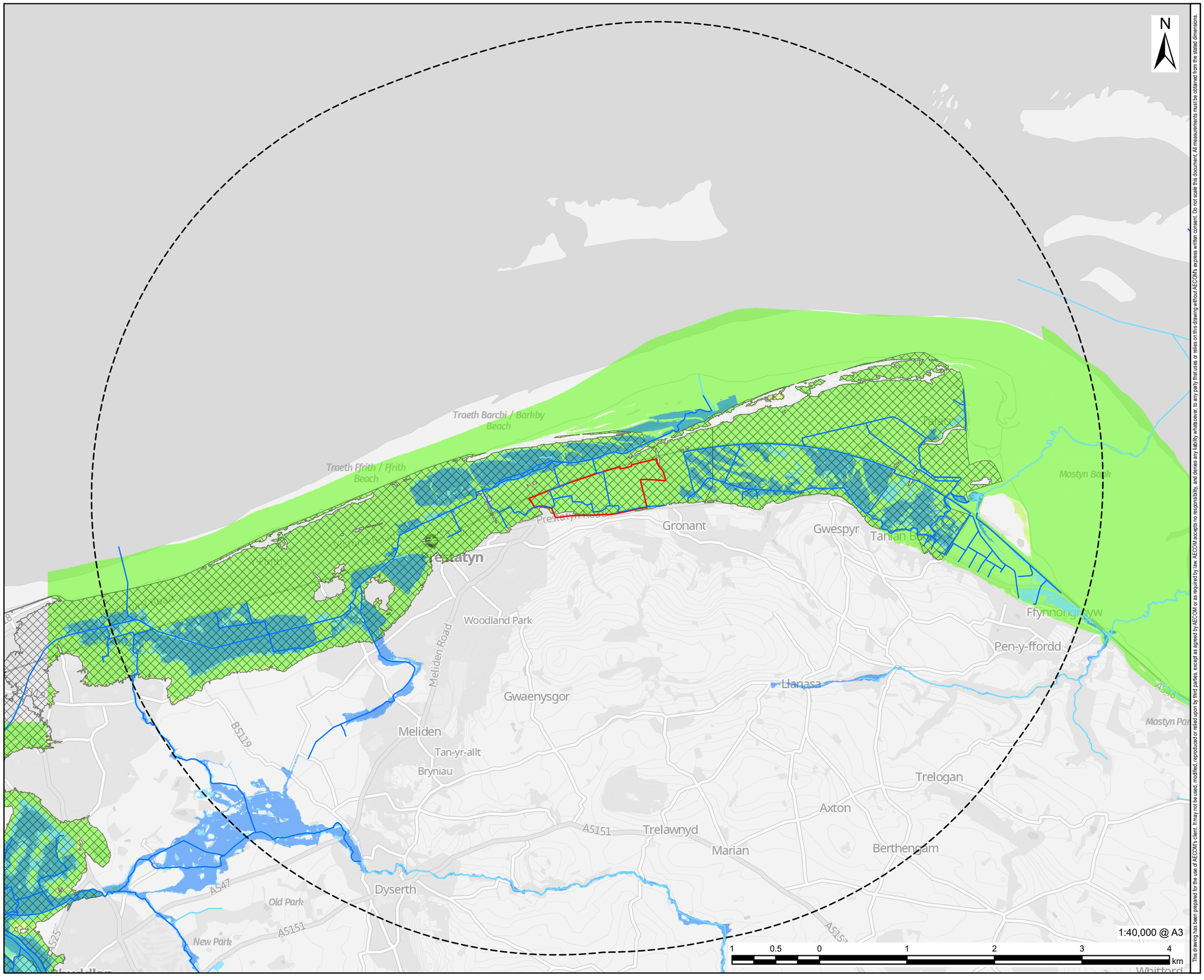
FIGURE NUMBER

Figure 3
Sheet 1 of 3

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LEGEND

- Site Boundary
- 5km Buffer of the Site Boundary
- Main River
- Surface Watercourse
- TAN15 Defended Zone

Flood Risk Assessment - Risk from Rivers

- Flood Zone 2
- Flood Zone 3

Flood Risk Assessment - Risk from Seas

- Flood Zone 2
- Flood Zone 3

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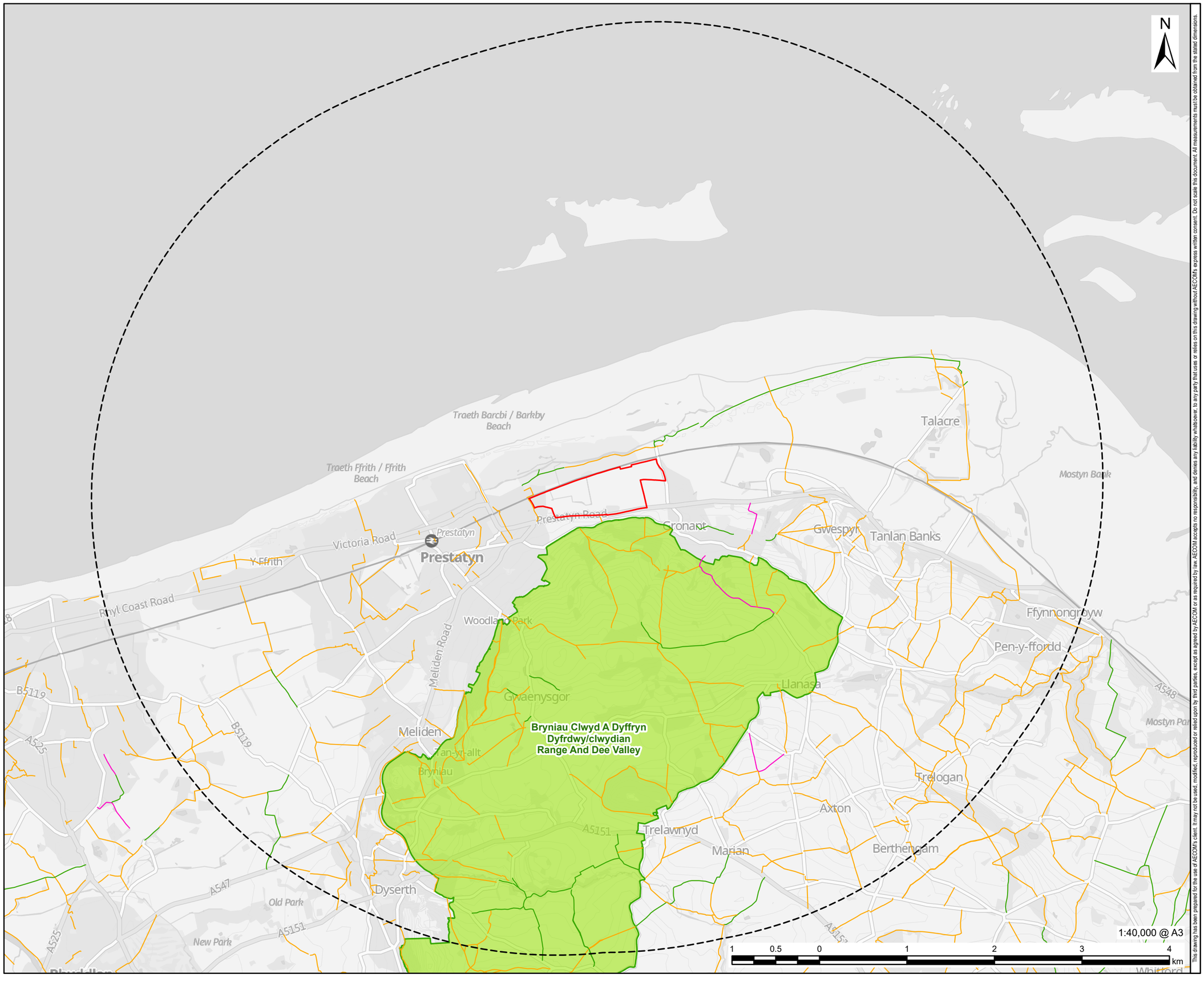
Environmental Constraints - Water

FIGURE NUMBER

Figure 3
Sheet 2 of 3

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LEGEND

- Site Boundary
- 5km Buffer of the Site Boundary
- Area of Outstanding Natural Beauty (AONB)

Public Right of Way(PRoW)

- Bridleway
- Byway open to all traffic
- Footpath

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FIGURE TITLE

Environmental Constraints - Other

FIGURE NUMBER

Figure 3
Sheet 3 of 3

Annex B: Qualifying Features

Site Name	Description	Qualifying Interest Features
Dee Estuary SPA	The Dee Estuary is one of the largest estuaries in the UK, with an area of over 14,000 ha (140 km^2). The Dee Estuary is hypertidal with a mean spring tidal range of 7.7 m at the mouth. The estuary historically stretched as far inland as Chester and its form has been modified considerably over the past 300 years as a direct result of human intervention. The intertidal area is currently dominated by mudflats and sandflats with the remainder being largely saltmarsh. At low water spring tides, over 90% of the estuary dries out. The extensive intertidal flats of the Dee Estuary form the fifth largest such area within an estuary in the UK. The site is of major importance for waterbirds; during the winter the intertidal flats, saltmarshes and fringing habitats including coastal grazing marsh/fields, provide feeding and roosting sites for internationally important numbers of ducks and waders; in summer the site supports nationally important breeding colonies of two species of tern. The site is also important during migration periods, particularly for wader populations moving along the west coast of Britain and for sandwich terns post-breeding.	During the breeding season the area regularly supports: • A195 little tern *Sterna albifrons* • A193 common tern *Sterna hirundo* Over winter the area regularly supports: • A157 bar-tailed godwit *Limosa lapponica* • A054 pintail *Anas acuta* • A052 teal *Anas crecca* • A672 dunlin *Calidris alpina alpina* • A143 knot *Calidris canutus* • A130 Oystercatcher *Haematopus ostralegus* • A616 black-tailed godwit *Limosa limosa islandica* • A160 curlew *Numenius arquata* • A141 grey plover *Pluvialis squatarola* • A048 shelduck *Tadorna tadorna*

Site Name	Description	Qualifying Interest Features
		• A162 redshank *Tringa totanus* On passage the area regularly supports: • A191 sandwich tern *Sterna sandvicensis* • A162 redshank *Tringa totanus* WATR The site qualifies for supporting an internationally important assemblage of birds.
The Dee Estuary Ramsar	As above	Qualifies under the following Criterion: Ramsar criterion 1 • Extensive intertidal mud and sand flats (20 km by 9 km) with large expanses of saltmarsh towards the head of the estuary. Ramsar criterion 2 • Supports breeding colonies of the vulnerable natterjack toad, *Epidalea calamita* Ramsar criterion 5 • Assemblages of international importance Ramsar criterion 6 • Species/populations occurring at levels of international importance

Site Name	Description	Qualifying Interest Features
Dee Estuary SAC	As above	Annex I habitats present that are a primary reason for selection of this site: • 1140 Mudflats and sandflats not covered by seawater at low tide • 1310 Salicornia and other annuals colonizing mud and sand • 1330 Atlantic salt meadows (*GlaucoPuccinellietalia maritimae*) Annex I habitats present as a qualifying feature, but not a primary reason for selection of this site: • 1130 Estuaries • 1210 Annual vegetation of drift lines • 1230 Vegetated sea cliffs of the Atlantic and Baltic Coasts • 2110 Embryonic shifting dunes • 2120 "Shifting dunes along the shoreline with *Ammophila arenaria* (""white dunes"")" • 2130 "Fixed coastal dunes with herbaceous vegetation (""grey dunes"")" * Priority feature • 2190 Humid dune slacks

Site Name	Description	Qualifying Interest Features
		Annex II species present as a qualifying feature, but not a primary reason for site selection: • 1095 Sea lamprey *Petromyzon marinus* • 1099 River lamprey *Lampetra fluviatilis* • 1395 Petalwort *Petalophyllum ralfsii*
Liverpool Bay / Bae Lerpwl (Wales) SPA	Liverpool Bay is located in the south-eastern region of the northern part of the Irish Sea, bordering north-west England and north Wales. The SPA is a broad arc from approximately Morecambe Bay to the east coast of Anglesey. The seabed of the SPA consists of a wide range of mobile sediments. Large areas of muddy sand stretch from Rossall Point to the Ribble Estuary, and sand predominates in the remaining areas, with a concentrated area of gravelly sand off the Mersey Estuary and a number of prominent sandbanks off the English and Welsh coasts. The tidal currents throughout the SPA are generally weak, which combined with a relatively large tidal range facilitates the deposition of sediments.	During the breeding season the area regularly supports: • A195 Little tern *Sternula albifrons* • A193 Common tern *Sterna hirundo* Over winter the area regularly supports: • A001 Red-throated diver *Gavia stellata* • A177 Little gull *Hydrocoloeus minutus* On passage the area regularly supports: • A065 Common scoter *Melanitta nigra*