Connah's Quay Low Carbon Power

Preliminary Environmental Information Report
Volume IV, Appendix 2-A: Transboundary Screening Matrix

Uniper

The Planning Act 2008
The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017
PINS Reference: EN010166
September 2024

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1. Transboundary Effects Matrix

Regulation 32 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 requires the consideration of any likely significant effects on the environment of European Economic Association (EEA) States.

Guidance upon the consideration of transboundary effects is provided in the PINS's Advice Note 12: Transboundary Impacts and Process.

Paragraph 3.1.4 of PINS Advice Note 12 explains:

3.1.4 All NSIPs that are EIA development will be subject to a transboundary screening process determined and undertaken by the Inspectorate on behalf of the SoS. Where the SoS is satisfied that the likelihood of transboundary effects is extremely low, the transboundary screening decision will be included in a scoping opinion (if one is requested) or as a separate, short proforma where a scoping opinion is not requested. If the SoS is not satisfied that the likelihood of transboundary effects is extremely low, the transboundary screening decision will be provided in a separate long proforma. The position in respect of the likelihood of transboundary effects will remain under review pending any new or materially different information coming to light. However, the Inspectorate will not update the screening decision where it remains valid.

The following screening matrix provides the consideration of transboundary effects for the Proposed Development, taking guidance from Advice Note 12 (Annex 1).

Criteria and Relevant Consideration	Commentary with Regard to the Proposed Development
Characteristics of the development: • Size of development; • Use of natural resources; • Production of waste; • Pollution and nuisance; • Risk of accidents; and • Use of technologies.	The proposed CCGT generating station will be designed to operate with post-combustion CCP plant installed such that the plant can be operated as a dispatchable, low-carbon generating station. The Site encompasses a total area of approximately 186 ha and is indicative at this stage encompassing the natural gas, CO_2, electricity and water connections and routes for abnormal indivisible loads that may be required. The resources required for the construction of the Proposed Development are likely to be obtained from the global to local scale markets and where reasonably practicable, materials would be obtained locally. No waste, nuisances or accidents are likely to extend beyond the border of the UK. No novel technologies are proposed that have potential for transboundary effects.
Location of development and Geographical area • What is the existing use?; • What is the distance to another EEA state? (Name EEA state)?; and • What is the extent of the area of a likely impact under the jurisdiction of another EEA state?	The Proposed Development's closest EEA boundary is the Republic of Ireland, located approximately 185 km to the west. No impacts are likely to extend beyond the jurisdiction of the UK.

Criteria and Relevant Consideration	Commentary with Regard to the Proposed Development
Environmental importance: • Are particular environmental values likely to be affected?; • Capacity of the natural environment; and • Wetlands, coastal zones, mountain and forest sites, nature reserves and parks, Natura 2000 sites, area where environmental quality standards already exceeded, densely populated areas, landscapes of historical, cultural or archaeological significance.	Potential impacts and the potential for likely significant effects on relevant qualifying features of internationally designated sites (referred to as Habitat Sites) will be considered and presented within a HRA Report that will accompany the DCO Application. The Site is partially located within and in close proximity to a Ramsar site, SPA, and SAC. This natural environment is juxtaposed with an existing industrialised area of Flintshire, including the existing CCGT Connah's Quay Power Station. The Proposed Development forms part of a long-term replacement strategy for the existing CCGT on the Main Site. It is not anticipated that there is potential for transboundary effects (and therefore any effects on important environmental receptors beyond the UK).
Potential impact and carrier • By what means could impacts be spread?	The primary available pathways for impact include emissions to atmosphere and emissions to water.
Extent • What is the likely extent of the impact? Magnitude • What will the likely magnitude of the change in relevant variables relative to the status quo, taking into account the sensitivity of the variable? Probability • What is the degree of probability of the impact? • Is the impact likely to occur as a consequence of the normal conditions or exceptional situations, such as accidents? Duration • Is the impact likely to be temporary, short-term or long-term? • Is the impact likely to relate to the construction, operation or decommissioning phase of the activity? Frequency • What is likely to be the temporal pattern of the impact Reversibility • Is the impact likely to be reversable or irreversible	The only potential transboundary environmental impact is considered to arise from GHG emissions, which would be spread by atmospheric processes. It is recognised that GHG emissions contribute to changes to climate that occur on a global scale. The impact of GHG emissions is considered irreversible within human lifetimes, however, the Proposed Development seeks to align with and contribute positively to the UK Government's target to achieve net-zero emissions by 2050. It is proposed to calculate the likely GHG emissions generated by the Proposed Development as part of the EIA and report these within the ES that accompanies the DCO Application. In line with relevant guidance, the Proposed Developments emissions will be contextualised against the UK national and Welsh carbon budgets as proposed by the CCC, agreed by government, and ratified by parliament and Senedd Cymru, respectively. In any event, the global nature of GHG impacts means that it is not possible to apportion or identify any impact in GHG emissions in terms of environmental effects on any particular country or state. Due to the distance to the nearest EEA State, it is considered unlikely that any impacts that arise from the Proposed Development would generate any significant effect to any receptor in any other EEA State including those impacts resulting from GHG emissions from the Proposed Development, as the environmental receptor in this regard is the global atmosphere, rather than

Criteria and Relevant Consideration	Commentary with Regard to the Proposed Development
	the environment of any country or state or group of countries or states. The GHG emissions are considered at a global level, and so are captured by the assessment in any event. The magnitude of the climate change impacts will be assessed and reported in the ES as part of the GHG assessment in the Climate Change chapter. GHG emissions are probable and will occur as a result of normal operation of the Proposed Development, noting that the Proposed Development will be designed to capture the CO_2. CO_2 emissions will result from both the construction and operational phases. The impact to the global atmospere long-term, however, the Proposed Development is intended to contribute to the UK's long-term GHG emissions reduction targets.
Cumulative impacts • Are there other major development close by?	Schemes within 15 km of the Proposed Development will be taken into consideration in the EIA. On this basis, it is not anticipated that there is potential for likely significant cumulative transboundary effects.

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Preliminary Environmental Information Report
Volume IV, Appendix 2-B: Scoping Opinion Responses

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1. Scoping Opinion Responses

1.1 Overview

1.1.1 This technical appendix of the Preliminary Environmental Impact Report (PEIR) summarises the issues raised in the Secretary of State's Scoping Opinion on the Proposed Development (**Appendix 1-B: Scoping Opinion** (**PEIR Volume IV**) and describes how the issues raised by the Planning Inspectorate and other interested consultation bodies have been taken into account during the environmental assessment and design development of the Project.

1.1.2 **Table 1** lists the issues raised by the Planning Inspectorate and other consultation bodies, with subsequent columns stating how this has been addressed in the PEIR.

Table 1: Scoping Opinion Responses

Chapter	Comment ID (where applicable)	Consultee	Summary of Comment	Response
Figure 1-2 - Indicative DCO Site	2.1.1	The Inspectorate	It would assist the reader if a thinner red line boundary could be used to show the exact land required and assessed for the Proposed Development.	Thickness of the red line boundary used in figures has been reduced where possible.
General	2.2.2	The Inspectorate	The ES should include sensitivity testing of any survey data collated from previous developments, most notably Hynet Carbon Dioxide Pipeline DCO with which it has an overlapping boundary, to ensure applicability and reliability.	Sensitivity testing of survey data collated from previous developments (including the Hynet Carbon Dioxide Pipeline DCO) and held by third parties has been undertaken. This is detailed where relevant in **Volume II** of the PEIR and supporting technical appendices in **Volume IV** of the PEIR.
General	2.2.3	The Inspectorate	The ES should consider the potential for mitigation measures to impact on other environmental aspects. Consideration should be given to when in the assessment period the mitigation measure will be in place. For example, it is noted that paragraph 9.6.2 of the Scoping Report that screening might be used as mitigation for visual disturbance to birds. Any likely significant effects arising from the presence of screening should also be assessed as relevant, eg. for landscape and visual receptors.	The preliminary assessments presented in the PEIR consider the potential impacts of mitigation measures that may arise on other environmental aspects.
General	2.2.4	The Inspectorate	Several of the aspect chapters of the Scoping Report state that additional mitigation for likely significant adverse effects would be provided where "it is reasonably practicable". The ES should describe how significant adverse effects are proposed to be mitigated. Any mitigation proposed should be identified in the ES; the description should be sufficiently detailed to demonstrate how significant effects will be avoided or minimised. Where further detail is proposed within management plans, outline versions should be submitted and the ES should clearly demonstrate how implementation will be secured through the DCO. Where significant adverse effects remain after any proposed additional mitigation, or if additional mitigation is not available, the ES should identify and describe any proposed compensatory measures and confirm how these would be secured (where appropriate). Any measures identified should be consulted on with relevant consultation bodies.	Details of proposed mitigation measures are provided in the preliminary technical assessments presented in **Volume II** of the PEIR. A Summary of Mitigation will be provided as part of the application for development consent to detail all relevant mitigation and explain how each measure (or action) is proposed to be secured through the Draft DCO. At this stage, within **Volume II** of the PEIR, reference is made to management plans that will be prepared and secured through requirements in the Draft DCO. Technical assessments presented within the ES will include details of consultation and engagement with relevant consultation bodies which will cover the adequacy of mitigation (where relevant).
General	N/A	Cadent Gas	No comment. Following a review of our records, it is confirmed that this project falls outside of Cadent's operational area and therefore has nothing to add.	It is acknowledged that Cadent Gas have no comments.
General	N/A	Natural Resources Wales	We note that the Harbour Master has been consulted separately and has responded directly on maritime/navigation issues. In NRW's capacity as the Statutory Harbour Authority for the Dee Estuary Conservancy, we also own land (riverbed and foreshore of the river Dee) associated with the Water Connection Corridor outlined in the Scoping Report. We therefore advise that the applicant contacts NRW's estates team (EstatesNorthWest@cyfoethnaturiolcymru.gov.uk) to discuss any relevant land ownership matters associated with this project.	It is acknowledged that NRW have written to the Harbour Master and that further consultation on this matter is recommended.
General	N/A	Natural Resources Wales	Paragraph 1.7.1 of the Scoping Report refers to the applicant's proposed provisions for a 'deemed' Marine Licence within the Development Consent Order (DCO) application, depending on the works required in the marine environment. Please advise the applicant that there is no provision in legislation for a 'deemed' marine licence as part of the DCO process in the Welsh Inshore area. Therefore, a development that lies in the Welsh Inshore area and requires a Marine Licence from NRW cannot be deemed. We therefore advise that the applicant contacts NRW's Marine Licensing team (marinelicensing@cyfoethnaturiolcymru.gov.uk) directly regarding any queries about this matter.	Acknowledged. Depending on the extent of any upgrades that may be required to existing infrastructure, the Application for a DCO for the Proposed Development may be accompanied by a separate Marine Licence (ML). Consultations regarding the ML and any associated assessment requirements will be held with Natural Resources Wales (NRW) Marine Licencing Team as the EIA / DCO application progresses. Further information is provided in Section 4.6 of **Chapter 4: The Proposed Development** (**PEIR Volume II**).
General	N/A	Natural Resources Wales	Uniper UK Ltd. hold an Environmental Permit for the existing operation of four Combined Cycle Gas Turbines (CCGTs) and the now decommissioned gas treatment plant at the Connah's Quay Power station. The permit implements the requirements of Chapter III of the EU Directive on Industrial Emissions for large combustion plant (LCP). In accordance with the Environmental Permitting (England and Wales) Regulations 2016, the proposed development would require a substantial variation to the existing Environmental Permit. The new combustion plant will also be subject to Chapter III of the Industrial Emissions Directive. The operation	The Applicant are in discussion on this matter with NRW through the pre-application advice service. Further information will be provided in the application for development consent if a final position has been agreed with NRW.

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			of a carbon capture plant would require the introduction of a new listed activity to the Environmental Permit (Schedule 1, Chapter 6, Section 6.10, Part A(1)(a)).	
General	N/A	Natural Resources Wales	Where a European Protected Species is identified and the development proposal is predicted to likely contravene the legal protection they are afforded, a licence should be sought from NRW. The ES should include consideration of the requirements for a licence and set out how the works will satisfy the three requirements as set out in the Conservation of Habitats and Species Regulations 2017 (as amended). One of these requires that the development authorised will 'not be detrimental to the maintenance of the population of the species concerned at a favourable conservation status (FCS) in their natural range.' These requirements are translated into planning policy through Planning Policy Wales (PPW), edition 12, dated February 2024, sections 6.4.35 and 6.4.36 and Technical Advice Note (TAN) 5, Nature Conservation and Planning (September 2009). The relevant decision maker should take them into account when considering development proposals where a European Protected Species is present.	Acknowledged. Further information on the requirement for protected species licences is provided in **Section 11.5** of **Chapter 11: Terrestrial and Aquatic Ecology** (**PEIR Volume II**).
General	N/A	Natural Resources Wales	The site is located close to the River Dee, which is a main river. We advise that a Flood Risk Activity Permit (FRAP) (Environmental Permitting (England & Wales) Regulations 2016) may be required for any permanent or temporary works in, over, under or within 16 metres of a tidal main river, or within 16 metres of any flood defence structure on that river, or within a flood plain. See our website for further information: Natural Resources Wales / Flood risk activity permits. We note that some works will be in the marine environment and will be subject to a Marine Licence, including the possible new abstraction and discharge infrastructure and new eel screens. Any works covered by a Marine Licence will be excluded from requiring a FRAP. However, any works that do not require or are exempt from a Marine Licence may still need a FRAP, if they meet the definition of a flood risk activity.	It is acknowledged that a FRAP would be required. Further details on this matter are provided in Section 13.5 of **Chapter 13: Water Environment and Flood Risk** (**PEIR Volume II**).
General	N/A	Halkyn Community Council	No observations to the scoping consultation.	It is acknowledged that Halkyn Community Council have no comments.
General	N/A	NATS Safeguarding	NATS operates no infrastructure within 10km of the development site. Accordingly it anticipates no impact from the proposal and has no comments to make on the Scoping Report.	Its is acknowledged that NATS has no comments.
General	N/A	Defence Infrastructure Organisation	In this case the development falls within Low Flying Area 7 (LFA 07), an area within which fixed wing aircraft may operate as low as 250 feet or 76.2 metres above ground level to conduct low level flight training. The addition of structure(s) in this location has the potential to introduce a physical obstruction to low flying aircraft operating in the area. To address this impact, and given the location and scale of the development, the MOD require conditions are added to any consent issued requiring that the development is fitted with aviation safety lighting and that sufficient data is submitted to ensure that structures can be accurately charted to allow deconfliction. Suggested condition wordings are set out in Appendix A. As a minimum the MOD would require that the tallest structure on the site be fitted with 25cd visible or infra-red beacons, and for any of the structures at the site over 50m to be charted.	Both the acknowledgement that the Proposed Development is within LFA 07 and the wording relating to lighting requirements and further conditions have been added to the 'Aviation' section of Topics to be Scoped Out within **Chapter 2: Assessment Methodology and Consultation** (**PEIR Volume II**).
General	N/A	Shotton Town Council (N.B. late response so not included in main Scoping Opinion report)	Although members were very interested in the scheme, the overall response was that the documents needed to be more concise and simplified for clarity. We look forward to hearing of any further developments.	This response is acknowledged. A Non-Technical Summary of the PEIR (**PEIR Volume I**) has been prepared to provide a summary of the PEIR in a concise manner.
Design	N/A	National Gas Transmission (NGT)	NGT has two feeder mains located within or in proximity to the Order limits. Details of this infrastructure is as follows: ▪ Feeder Mains (Mickle-Trafford to Deeside PS & Burton Point Spur) ▪ Freehold Land – CYM342149 ▪ Ancillary apparatus	This point raised by NGT on the presence of existing easements is acknowledged. The Applicant will continue to engage NGT in relation to the Proposed Development.

Chapter	Comment ID (where applicable)	Consultee	Summary of Comment	Response
			Please note that NGT has existing easements for these pipelines which provides rights for ongoing access and prevents the erection of permanent / temporary buildings/structures, change to existing ground levels or storage of materials etc within the easement strip. You should also be aware of NGT's guidance for working in proximity to its assets, further guidance and links are available as follows. Where the Promoter intends to acquire land, extinguish rights, or interfere with any of NGT's apparatus, NGT will require appropriate protection and further discussion on the impact to its apparatus and rights including adequate Protective Provisions. A Deed of Consent will also be required for any works proposed within the easement strip.	
Design	N/A	SP Energy Networks (N.B. late response so not included in main Scoping Opinion report)	SP Energy Networks must ensure the avoidance of any adverse impact on its assets as we all drive to maintain a network that is capable of meeting the increase in demand from an all-electric economy. The next decade will be crucial in preparing the grid for these changes and this is why we are very interested in being able to comment on the proposals which may undermine maintaining and operating and developing a suitable future grid network.	This point raised by SP Energy Networks is acknowledged. The Applicant will continue to engage SP Energy Networks in relation to the Proposed Development.
Design	N/A	SP Energy Networks	SP Energy Networks requires that there be measures in place to protect SP Manweb network assets and ensure safe working around the affected SPM network. At this stage, it is suggested the application plans and required environmental impact assessment include a plan showing all of the SPM network and an assessment of the impact of the proposals on this network. This is critical 132kV national infrastructure that must not be impacted on. There should also be a draft construction management plan which has a section on utilities and explains how impacts on the existing network is to be managed and mitigated. SPM requires there to be adequate space to maintain and operate its network in accordance with statutory obligations.	The Applicant has collected information on the location of utilities within the Indicative Site Boundary. Utilities will continue to be mapped and avoided where reasonably practicable. Where unavoidable, construction methods should ensure that impacts on assets are avoided. The Applicant will engage with SP Energy Network to discuss any crossing locations and construction methods and are open to negotiating and agreeing protective provisions to be included in the DCO. Section 5.10 of **Chapter 5: Construction Programme and Management** (**PEIR Volume II**) provides details of the Framework Construction Environmental Management Plan (CEMP) including Outline Site Waste Management Plan (OSWMP) that will be prepared and submitted as part of the application for development consent. The location of National Grid Overhead infrastructure is shown on **Figure 3-A** (**PEIR Volume III**).
Design	N/A	SP Energy Networks	SP Energy Networks is seeking to obtain from the applicant detailed plans of their proposals showing SPM assets and the proposed DCO limits. Until a plan showing the proposed development in relation to SPM network is provided and agreed, and protective provisions are drafted and discussed and agreed with SP Energy Networks, then objection is raised to there being no provision in the application to such measures. The applicant's assistance with this would help progress this matter. SP Energy Networks would like to resolve matters as much as possible and would like to see clarification on the crossover points/SPM assets as soon as further details can be provided.	SPM assets are not currently included on mapping provided within the PEIR and will be included on plans provided as part of the application for development consent. Utilities will continue to be mapped and avoided where reasonably practicable. Where unavoidable, construction methods should ensure that impacts on assets are avoided. The Applicant will engage with SP Energy Network to discuss any crossing locations and construction methods and are open to negotiating and agreeing protective provisions to be included in the DCO.
Design	N/A	SP Energy Networks	Mitigation proposals will also need to take account of SPM assets and the operational requirements. In addition, SPM benefits from numerous land rights interested across the application site and these must be maintained for SPM to manage and operate a safe and reliable network.	This point is acknowledged. Uniper will continue to engage with SP Energy Network to ensure appropriate measures are defined and included in the Framework CEMP.
Design	N/A	SP Energy Networks	There are a number of key areas to resolve in relation to SPM network, which is critical to protect as it is this network that will be relied upon to distribute the generation into local homes and businesses. Any adverse impacts on the SPM network that need to be resolved by SPM would impact on the benefits of delivering this proposed scheme. The applicant should discuss the above with SP Energy Networks as soon as possible. Given the extent of the information prepared and submitted, it is a reasonable expectation for there to be a plan produced showing the SPM asset as likely to be most affected and	SPM assets are not currently included on mapping within the PEIR and will be included on plans provided as part of the application for Development Consent. Utilities will continue to be mapped and avoided where reasonably practicable. Where unavoidable, construction methods should ensure that impacts on assets are avoided. The Applicant will engage with SP Energy Network to discuss any crossing locations and

Chapter	Comment ID (where applicable)	Consultee	Summary of Comment	Response
			how, and an SPM network diversions worksheet that outlines how this network will be managed within the proposed development. This should be included in an infrastructure section in the EIA assessment.	construction methods and is open to negotiating and agreeing protective provisions to be included in the DCO.
Design	N/A	SP Energy Networks	SP Energy Networks will continue to review the application and may wish to raise further matters in due course and welcomes further engagement with the applicant.	This point is acknowledged. The Applicant will continue to engage with SP Energy Networks.
Design	N/A	National Grid Electricity Transmission (N.B. late response so not included in main Scoping Opinion report)	NGET has high voltage electricity overhead transmission lines, underground cables and a high voltage substation within the scoping area. The overhead lines and substation forms an essential part of the electricity transmission network in England and Wales.	This point is acknowledged. The Applicant will continue to engage with NGET in relation to the Proposed Development.
Design	N/A	National Grid Electricity Transmission	Please refer to the Holistic Network Design (HND) and the National Grid ESO website to view the strategic vision for the UK's ever growing electricity transmission network. https://www.nationalgrideso.com/future-energy/the-pathway-2030-holistic-network-design/hnd'	This point is acknowledged. The resource provided has been reviewed.
Design	N/A	National Grid Electricity Transmission	NGET requests that all existing and future assets are given due consideration given their criticality to distribution of energy across the UK. We remain committed to working with the promoter in a proactive manner, enabling both parties to deliver successful projects wherever reasonably possible. As such we encourage that ongoing discussion and consultation between both parties is maintained on interactions with existing or future assets, land interests, connections or consents and any other NGET interests which have the potential to be impacted prior to submission of the Proposed DCO.	The Applicant will engage with NGET to discuss any crossing locations and construction methods and is open to negotiating and agreeing protective provisions to be included in the DCO which will protect NGET's apparatus and interests that interface with the Proposed Development.
Design	N/A	National Grid Electricity Transmission	The Great Grid Upgrade is the largest overhaul of the electricity grid in generations, we are in the middle of a transformation, with the energy we use increasingly coming from cleaner greener sources. Our infrastructure projects across England and Wales are helping to connect more renewable energy to homes and businesses. To find out more about our current projects please refer to our network and infrastructure webpage. https://www.nationalgrid.com/electricity- transmission/network-and-infrastructure/infrastructure-projects. Where it has been identified that your project interacts with or is in close proximity to one of NGET's infrastructure projects, we would welcome further discussion at the earliest opportunity.	This point is Acknowledged. The resource provided has been reviewed.
Design	N/A	National Grid Electricity Transmission	These projects are all essential to increase the overall network capability to connect the numerous new offshore wind farms that are being developed, and transport new clean green energy to the homes and businesses where it is needed. I enclose a plan showing the location of NGET's apparatus in the scoping area.	This point is acknowledged. The resource provided has been reviewed.
Design	N/A	National Grid Electricity Transmission	NGET's Overhead Line/s is protected by a Deed of Easement/Wayleave Agreement which provides full right of access to retain, maintain, repair and inspect our asset	This point is acknowledged. Uniper will continue to engage with NGET in relation to the Proposed Development.
Design	N/A	National Grid Electricity Transmission	Statutory electrical safety clearances must be maintained at all times. Any proposed buildings must not be closer than 5.3m to the lowest conductor. NGET recommends that no permanent structures are built directly beneath overhead lines. These distances are set out in EN 43 – 8 Technical Specification for "overhead line clearances Issue 3 (2004)".	This point is acknowledged. Uniper will continue to engage with NGET in relation to the Proposed Development.
Design	N/A	National Grid Electricity Transmission	If any changes in ground levels are proposed either beneath or in close proximity to our existing overhead lines then this would serve to reduce the safety clearances for such overhead lines. Safe clearances for existing overhead lines must be maintained in all circumstances.	This point is acknowledged. Uniper will continue to engage with NGET in relation to the Proposed Development.
Design	N/A	National Grid Electricity Transmission	The relevant guidance in relation to working safely near to existing overhead lines is contained within the Health and Safety Executive's (www.hse.gov.uk) Guidance Note GS 6 "Avoidance of Danger from Overhead Electric Lines" and all relevant site staff should make sure that they are both aware of and understand this guidance.	Acknowledged. The resource provided has been reviewed.

Chapter	Comment ID (where applicable)	Consultee	Summary of Comment	Response
Design	N/A	National Grid Electricity Transmission	Plant, machinery, equipment, buildings or scaffolding should not encroach within 5.3 metres of any of our high voltage conductors when those conductors are under their worse conditions of maximum "sag" and "swing" and overhead line profile (maximum "sag" and "swing") drawings should be obtained using the contact details above.	This point is acknowledged. Uniper will continue to engage with NGET in relation to the Proposed Development.
Design	N/A	National Grid Electricity Transmission	Drilling or excavation works should not be undertaken if they have the potential to disturb or adversely affect the foundations or "pillars of support" of any existing tower. These foundations always extend beyond the base area of the existing tower and foundation ("pillar of support") drawings can be obtained using the contact details above.	This point is acknowledged. Uniper will continue to engage with NGET in relation to the Proposed Development.
Design	N/A	National Grid Electricity Transmission	NGET high voltage underground cables are protected by a Deed of Grant; Easement; Wayleave Agreement or the provisions of the New Roads and Street Works Act. These provisions provide NGET full right of access to retain, maintain, repair and inspect our assets. Hence we require that no permanent / temporary structures are to be built over our cables or within the easement strip. Any such proposals should be discussed and agreed with NGET prior to any works taking place.	This point is acknowledged. Uniper will continue to engage with NGET in relation to the Proposed Development.
Design	N/A	National Grid Electricity Transmission	Ground levels above our cables must not be altered in any way. Any alterations to the depth of our cables will subsequently alter the rating of the circuit and can compromise the reliability, efficiency and safety of our electricity network and requires consultation with National Grid prior to any such changes in both level and construction being implemented.	This point is acknowledged. Uniper will continue to engage with NGET in relation to the Proposed Development.
Design	N/A	National Grid Electricity Transmission	We would request that the potential impact of the proposed scheme on NGET's existing and future assets as set out above and including any proposed diversions is considered in any subsequent reports, including in the Environmental Statement, and as part of any subsequent application.	This will be considered as relevant as part of the application for development consent.
Design	N/A	National Grid Electricity Transmission	Where any diversion of apparatus may be required to facilitate a scheme, NGET is unable to give any certainty with the regard to diversions until such time as adequate conceptual design studies have been undertaken by NGET. Further information relating to this can be obtained by contacting the email address below.	This point is acknowledged. Uniper will continue to engage with NGET in relation to the Proposed Development.
Design	N/A	National Grid Electricity Transmission	NGET requests to be consulted at the earliest stages to ensure that the most appropriate protective provisions are included within the DCO application to safeguard the integrity of our apparatus and to remove the requirement for objection. All consultations should be sent to the following email address: box.landandacquisitions@nationalgrid.com	This point is acknowledged. Uniper will continue to engage with NGET in relation to the Proposed Development.
Design	N/A	National Grid Electricity Transmission	Where the promoter intends to acquire land, extinguish rights, or interfere with any of NGET apparatus, protective provisions will be required in a form acceptable to it to be included within the DCO.	This point is acknowledged. Uniper will continue to engage with NGET in relation to protective provisions.
Chapter 1 - Introduction	2.2.1	The Inspectorate	The Scoping Report notes that the Proposed Development 'expects to make use of transport and storage networks owned and operated by Liverpool Bay CCS Limited, currently under development as part of the HyNet Carbon Dioxide Pipeline project'. This is one example, shared works and overlap with other projects are discussed elsewhere in the Scoping Report. The ES should clearly describe the relationship between the Proposed Development and connected projects. This should include the extent to which the Proposed Development is dependent on their delivery and the development timelines and anticipated consenting routes of the other projects, with an explanation of how these will be coordinated. The assessment should address the potential for the connected projects to result in a LSE. The Inspectorate advises that the ES sets out clearly and in detail, how the assessment addresses impacts resulting from consequential development and activity where significant effects are likely to result. The ES should clearly explain and justify the boundaries and limitations of the assessment and, noting uncertainty may persist, any reasonable assumptions that have been applied. The assessment should address the worst case (which may differ for different aspects).	As detailed in **Chapter 1: Introduction** (**PEIR Volume II**), it is expected that the Proposed Development will 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. Liverpool Bay CCS Ltd (or any identified successor organisation) will be responsible for the construction and operation (including maintenance) of the CO_2 transport and storage pipeline that forms part of the Proposed Development and for the construction and operation (including maintenance) of the HyNet CO_2 Pipeline Project downstream of the Proposed Development, and which is not part of the Proposed Development. It is expected that this downstream transport and storage network will be operational prior to the operation of the Proposed Development. Further information relating to the interface between the Proposed Development and the Hynet CO_2 Pipeline Project is provided in **Chapter 4: The Proposed Development** (**PEIR Volume II**). An assessment of potential cumulative effects with the Hynet CO_2 Pipeline Project will be presented within the ES. **Chapter 24: Cumulative and Combined Effects** (**PEIR Volume II**) sets out the proposed methodology

Chapter	Comment ID (where applicable)	Consultee	Summary of Comment	Response
				for this cumulative effects assessment and contains a long list and short list of projects proposed to be scoped into the assessment.
Chapter 3 - Description of the Existing Environment	2.1.2	The Inspectorate	Scoping Report paragraph 2.1.21 notes that 'minor upgrade works adjacent to the Main Site may be required at the existing Access to Wildlife Hides immediately north-east (SJ279712) and immediately north-west (SJ267719) of the Main Site and at the\ Existing Surface Water Outfall immediately north (SJ278712) of the Main Site.' The ES should ensure that all works that have the potential of being required are described and assessed and therefore, these should be detailed in the Project Description.	It is currently anticipated that access will continue from the existing Connah's Quay Power Station site entrance, with a designated access road following the southern and western boundary fence of the ecological safeguard zone shown on **Figure 5-3 (PEIR Volume III)** and **Figure 5-4 (PEIR Volume III)**, which will minimise health and safety risks associated with the construction works. Additional maintenance or minor upgrade works adjacent to the Main Site may be required at the existing Access to Wildlife Hides in order to maintain suitable access to and use of the existing wildlife hides, shown on **Figure 3-2 (PEIR Volume III).**
Chapter 3 - Description of the Existing Environment	2.1.3	The Inspectorate	The Scoping Report does not provide a width for all of the corridor works. The descriptions applied to the works are inconsistent and full parameters should be described in the ES.	Details of parameters considered within the PEIR are included in **Chapter 4: The Proposed Development** (**PEIR Volume II**). **Table 4-1** identifies the indicative dimensions of components of the Proposed Development. Further details of the assumed corridor works are also presented in **Chapter 4: The Proposed Development** (**PEIR Volume II**).
Chapter 3 - Description of the Existing Environment	N/A	Natural Resources Wales	There appears to be an error in Annex B, Preliminary Ecology Appraisal, Table 2-2 as the Dee Estuary SSSI is listed twice but with different proximities to the development site. We therefore advise that this is reviewed and corrected.	Acknowledged. This has been corrected in **Appendix 11-C: Preliminary Ecological Appraisal** (**PEIR Volume IV**).
Chapter 4 - The Proposed Development	2.1.4	The Inspectorate	The ES should clearly set out the parameters of the assessment, phrases such as 'limited period' should be explained.	Details of parameters considered within the PEIR are included in **Chapter 4: The Proposed Development** (**PEIR Volume II**). Table 4-1 identifies the indicative dimensions of components of the Proposed Development. Further details of the assumed corridor works are also presented in **Chapter 4: The Proposed Development** (**PEIR Volume II**). **Chapter 2: Assessment Methodology and Consultation** (**PEIR Volume II**) provides a description of the assessment scenarios that have been considered within the PEIR.
Chapter 4 - The Proposed Development	2.1.5	The Inspectorate	The ES should set out whether the electrical connection is proposed to be underground or overground, ensuring all potential impacts are assessed, noting also whether any works are outside that being applied for in the draft Development Consent Order (dDCO). The Inspectorate advises that the ES sets out clearly how the assessment addresses impacts resulting from consequential development and activity where significant effects are likely to result.	The Applicant has confirmed that no works are expected within the Electrical Connection Corridor (though it has been included to maintain flexibility) and an appropriate description of this has been included in **Chapter 4: The Proposed Development** (**PEIR Volume II**). Paragraph 4.2.33 of Chapter 4: "*In order to export electricity from the Proposed Development, engagement is proposed with National Grid Electricity Transmission Plc (NGET) to identify the preferred connection option including any upgrades to existing apparatus that may be required. A new connection will be required from the Train(s) within the Proposed Development to the Applicant's existing 400 kV banking compound, which is expected to be used to connect the Proposed Development to the existing 400 kV NGET substation located south-east of the Main Site. This connection and the requirement for any works outside of the Main Site is subject to ongoing feasibility studies. The potential route connection options currently under consideration are shown on **Figure 3-2** (**PEIR Volume III**). Alternative route options that are considered will be presented and assessed in the Environmental Statement (ES) where flexibility in the final routing is to be sought by the Applicant*."

Chapter	Comment ID (where applicable)	Consultee	Summary of Comment	Response
Chapter 4 - The Proposed Development	2.1.6	The Inspectorate	The Scoping Report states that this area [the Indicative Enhancement Area referred to in paragraph 3.2.26 of the Scoping Report] may be required for a temporary construction compound prior to the enhancement area being created. The ES should be clear on likely timescales required and apply these to the assessment to ensure that the proposed enhancement area, like any mitigation, is not relied upon in the assessment prior to its establishment. Furthermore, it is noted that this indicative enhancement area is located on an historic landfill site, as identified in consultee responses, the Applicant should consider any likely significant effects (LSE) arising from this historic land use.	The preliminary assessments presented in the PEIR consider the use of these areas, as detailed in **Chapter 5: Construction Management and Programme** (**PEIR Volume II**) where construction laydown and contractors' compounds are discussed in further detail in Section 5.4. Section 4.4 of **Chapter 4: The Proposed Development** (**PEIR Volume II**) identifies that the Construction and Indicative Enhancement Area Laydown Area, following use for construction laydown, together with reinstated areas of the Main Site that have been used for construction, may be used for ecological mitigation and to secure an overall net biodiversity benefit. An Outline Landscape and Biodiversity Management and Enhancement Plan (LBMEP) and a Green Infrastructure Statement will accompany the Application and set out the implementation plan for these measures, including timelines for establishment.
Chapter 4 - The Proposed Development	2.1.7	The Inspectorate	The Inspectorate notes that there is potential for operational maintenance dredging, including around the cooling water intake. The ES should include a description of any maintenance dredging proposed, including its location, the likely type and volume of sediment to be dredged and the proposed deposit location. This should include any effects associated with release of sediment-bound contaminants, turbidity and habitat loss/ disturbance. Impacts on other aspects should be considered, such as marine ecology and physical processes. Any LSE arising from such activity should be described in the ES. Paragraph 3.3.22 of the Scoping Report states that there would be no capital dredging required as part of the construction works. If this changes, the Inspectorate advises that the ES should provide a description of any construction phase dredging proposed, including frequency, location, type and volume of sediment and deposit location, together with an assessment of any significant effects likely to occur as a result.	As described in Section 5.4 of **Chapter 5: Construction Management and Programme** (**PEIR Volume II**) capital dredging is assumed and will be assessed in the ES. By this time, further assessment of the design for the Water Connection will have been completed and further informed assessment of potential impacts will be possible.
Chapter 4 - The Proposed Development	2.1.8	The Inspectorate	Paragraph 3.3.5 of the Scoping Report discusses the existing Combined Cycle Gas Turbine (CCGT) plant. The Inspectorate considers that the ES should clearly consider the processes and emissions attributed to the existing CCGT plant and ensure maximum parameters are assessed, noting that the dDCO for the Proposed Development cannot control these. In addition, whilst it is stated that demolition of the existing CCGT plant is not required for the Proposed Development, the assessment should consider if demolition of the existing plant could take place during construction and operation of the Proposed Development and assess this to set out how this will be managed to mitigate effects.	Section 2.2 of **Chapter 2: Assessment Methodology and Consultation** (**PEIR Volume II**) describes the interface with Existing Connah's Quay Power Station. It is expected that emissions from baseline (of the existing CCGT plant) would not be increased by the Proposed Development as they would not operate to their respective maximum capacity simultaneously or exceed the known maximum parameters of the site. Emissions from the existing CCGT plant are considered as part of the baseline for the relevant topics. It is expected that these baseline figures would be replaced by emissions that are expected to be of no greater amount during operation of the Proposed Development. Demolition of the existing CCGT plant during construction would not be possible during a single phase construction approach and is considered to be highly unlikely during a phased construction approach due to the constraints of the Site. There is potential for demolition of the existing CCGT plant to occur during the operation of the Proposed Development. This will be considered in the Environmental Statement for those relevant topics as a scenario.
Chapter 4 - The Proposed Development	2.1.9	The Inspectorate	The ES should clarify what is meant by 'suitable platform level', how this will be determined and what it has been determined to be. The assessments will need to ensure that an accurate ground level has been assessed.	As described in Section 4.3 of **Chapter 4: The Proposed Development** (**PEIR Volume II**), according to available light detection and ranging (LiDAR) data, typical ground levels of approximately 6 m to 8 m above ordnance datum are present within the Main Site where the CCGT and CCP are proposed and within the Electrical Connection Corridor. It is currently anticipated that some targeted ground raising may be required to increase ground levels in order to protect critical operational infrastructure from flood events and considering the effects of climate change. Proposed ground elevations and final finished floor levels will be informed by the

Chapter	Comment ID (where applicable)	Consultee	Summary of Comment	Response
				ongoing Flood Consequences Assessment, including technical engagement with Natural Resources Wales to agree the approach.
Chapter 4 - The Proposed Development	2.1.10	The Inspectorate	The ES should clearly set out whether the dDCO would permit the generation station to operate independently of the carbon capture elements. The ES should set out when the carbon capture element would be operational in relation to that of the generating station. The ES should set out a carbon capture rate and this should be considered in the relevant assessments.	Section 4.4 of **Chapter 4: The Proposed Development** (**PEIR Volume II**) outlines three scenarios where the CCGT may need to operate without the CCP. This includes in the events that the downstream T&S network is unavailable or during a National Transmission System (electrical) blackout event. Outside of the defined circumstances, it is expected that the CCGT will not operate unabated. Section 4.2 of **Chapter 4: The Proposed Development** (**PEIR Volume II**) also states that the Applicant expects to capture around 1.2 million tonnes per year for each Train installed (i.e. around 2.4 million tonnes CO_2 per year when both Trains are installed).
Chapter 4 - The Proposed Development	2.1.11	The Inspectorate	The Scoping Report is inconsistent between aspect chapters in the way in which decommissioning effects are being proposed to be assessed. Paragraph 3.10.3 sets out that 'It is generally assumed that the environmental effects associated with the decommissioning phase would be no worse than those experienced during construction and these will be assessed on this basis'. Whereas in some aspects, eg air quality; decommissioning is set out to be assessed (paragraph 6.5.1 of the Scoping Report). The Inspectorate advises that the ES should cover the life span of the Proposed Development, including decommissioning. The ES should provide a description of the activities and works (including the anticipated duration) which are likely to be required during decommissioning. Where the construction phase has been scoped in on the basis that LSE could occur, this suggests that there is potential for LSE to occur during the decommissioning phase. Difficulty of assessment is not an adequate justification to scope matters out. The ES should be clear as to how decommissioning will be assessed overall for the Proposed Development as well as on an aspect-by aspect basis. Furthermore, considering decommissioning is proposed to take place up to 30 years in the future, it should be clear how gaps in knowledge would be addressed for example through commitment to a decommissioning environmental management plan, which is demonstrably secured through the dDCO. Should the approach be taken that effects would be similar to those expected during construction, the ES should set out how a change in baseline could affect this and how this would be taken into account.	Section 4.5 of **Chapter 4: The Proposed Development** (**PEIR Volume II**) provides the current understanding of the decommissioning of the Proposed Development. It identifies that a Decommissioning Plan (including a Decommissioning Environmental Management Plan (DEMP)) will be produced at the time of decommissioning, pursuant to a Requirement of the draft DCO. The DEMP will include an outline programme of works, will consider all potential environmental risks and contain guidance on how risks can be removed, mitigated or managed, accounting for potential future changes to baseline conditions. This will include procedure on how surface water drainage should be managed during decommissioning and demolition. In the light of the control measures set out above that would form part of the proposed DEMP, unless otherwise stated, decommissioning is not anticipated to present any significant environmental effects beyond those that will be assessed for the construction phase of the Proposed Development. Therefore, unless otherwise stated within **Chapters 8 to 23** (**PEIR Volume II**), decommissioning is not anticipated to present any significant environmental effects beyond those assessed for the construction phase of the Proposed Development and are not assessed separately in the PEIR.
Chapter 4 - The Proposed Development	2.1.12	The Inspectorate	The Inspectorate notes the Applicant's intention to apply a 'Rochdale Envelope' approach to maintain flexibility within the design of the Proposed Development. The Inspectorate expects that at the point an application is made, the description of the Proposed Development will be sufficiently detailed to include the design, size, capacity, technology, and locations of the different elements of the Proposed Development. This should include the footprint and heights of the structures (relevant to existing and proposed ground levels), as well as land-use requirements for all elements and phases of the Proposed Development. The description should be supported (as necessary) by figures, cross-sections, and drawings which should be clearly and appropriately referenced. Where flexibility is sought, the ES should clearly set out the maximum design parameters that would apply for each option assessed and how these have been used to inform an adequate assessment in the EIA and most notable the worst case for each aspect.	As explained in Section 4.3 of **Chapter 4: The Proposed Development** (**PEIR Volume II**), a number of technical parameters have yet to be finalised for the Proposed Development, to allow the Applicant to maintain a necessary degree of flexibility as the Proposed Development design progresses. The envelope is informed by design parameters set out in Section 4.3 of **Chapter 4: The Proposed Development** (**PEIR Volume II**). These parameters may be further refined as the design progresses in order to control the overall scale and nature of the Proposed Development. It is recognised that the worst-case parameter for one technical assessment may differ from another and therefore each technical assessment in **PEIR Volume II**, provides a description of the assessment parameters utilised within the preliminary assessments. Details of parameters considered within the PEIR are included in **Chapter 4: The Proposed Development** of **Volume II** of the **PEIR**. Table 4-1 identifies the indicative dimensions of components of the Proposed Development.

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				Further details of the assumed corridor works are also presented in **Chapter 4: The Proposed Development** of **Volume II** of the **PEIR.**
Chapter 4 - The Proposed Development	2.1.13	The Inspectorate	The Scoping Report states that the Proposed Development could be delivered in a single phase or two phases, comprising two identical CCGT and carbon capture plant (CCP) trains. An indicative construction timeline for a two-phase delivery is described, with Phase 1 potentially commencing 2026 and lasting approximately four years, and Phase 2 (if progressed) potentially commencing 2031 and lasting four years. It is stated that the ES will provide further information. The ES should clearly set out for each of the aspects, the worst-case scenario of the two build out options for each assessment. It should include an assessment of any LSE arising from the phased nature of the Proposed Development, including risks of major accidents from the proximity of construction activity to the operational CCGT. Measures required to mitigate any LSE should be clearly described in drafts of the construction environmental management plan (CEMP) and/ or operational environmental management plan (OEMP) submitted with the application.	It is recognised that the worst-case parameter for one technical assessment may differ from another and therefore each technical assessment in **PEIR Volume II**, provides a description of the assessment parameters utilised within the preliminary assessments. A preliminary assessment of risk of major accidents is presented in Section 22.6 of **Chapter 22: Major Accidents and Disasters** (**PEIR Volume II**). A Framework CEMP is to be included with the ES to capture the mitigation measures detailed within the technical assessments presented in **PEIR Volume II**. As noted in Section 22.5 of **Chapter 22: Major Accidents and Disasters** (**PEIR Volume II**), the Proposed Development will be operated in line with appropriate standards, whilst the Applicant will implement and maintain an Environment Management System (EMS) which will be certified to International Standards Organization (ISO) 14001. The EMS will outline the requirements and procedures needed to ensure that the Proposed Development Site is operating to the appropriate standard.
Chapter 4 - The Proposed Development	2.1.14	The Inspectorate	The Scoping Report states that natural gas and water will be required for the operational phase of the Proposed Development. Paragraph 3.2.32 of the Scoping Report indicates that natural gas will continue to be imported from the existing connection and paragraph 3.2.29 indicates that water will be abstracted from the River Dee. However, it is unclear what volume of resource would be required and whether this would be available from the identified sources. In addition, it is unclear how any continued operation of the existing CCGT would affect the availability of the resource. The ES should include an estimate of the likely volume of the different natural resources, including those identified above and any other resources required for example as part of the carbon capture process, that will be required in the operation of the Proposed Development, how these will be transported to the site, and an assessment of any LSE arising from the use of such resources. The Applicant should consider whether new or existing consents or licences require requesting/renewing and the ES should provide commentary on these.	Section 4.1. of **Chapter 4: The Proposed Development** (**Volume II**) explains that natural gas will be used as the fuel for the operation of the CCGT. Subject to agreement with National Gas Transmission Plc (NGT), natural gas will be supplied through the existing Burton Point AGI and the Applicant's pipeline to the existing Connah's Quay AGI. A new 600 mm pipe diameter spur will tie-in to the existing Connah's Quay AGI and supply the new facility. Section 4.2 of **Chapter 4: The Proposed Development** (**PEIR Volume II**) also states that cooling water for the Proposed Development will be abstracted from and discharged to the River Dee, in line with the current process for the existing Connah's Quay Power Station CCGT. Cooling water abstraction and discharge will be limited to periods around high water, and it is assumed that this is likely to be in line with the current abstraction permit. Technical assessments are ongoing in order to identify the preferred option for cooling water infrastructure considering factors such as the age and condition of existing assets. The Proposed Development may utilise the existing Connah's Quay Power Station cooling water abstraction and discharge infrastructure located within the River Dee, as it is anticipated that this infrastructure is likely to be in a suitable condition for re-use with some refurbishment and additions; alternatively, new abstraction and discharge infrastructure may be required. Further information on the likely volume of the different natural resources that will be required in the operation of the Proposed Development will be provided in the ES.

Chapter	Comment ID (where applicable)	Consultee	Summary of Comment	Response
				The ES will also include further commentary on the requirement for any new consents or licence requirements.
Chapter 8 - Air Quality	3.1.1	The Inspectorate	The Inspectorate is content that the number of vehicle trips predicted for the 66 staff required at the site during operation and 14 Heavy Goods Vehicle (HGV) trips a day is unlikely to result in a significant effect on air quality. It is noted however that this is to increase to 230 Annual Average Daily Traffic (AADT) during years of maintenance. The Inspectorate, noting the response by Natural Resource Wales (NRW) and recognising that there is the potential for in-combination/ cumulative effects and impacts on future baseline as a result of other Proposed Developments within the vicinity of the site, deem that further information is required on the likely effects before this matter can be scoped out for air quality. The Applicant is encouraged to discuss this and seek agreement from relevant consultation bodies.	At the point of PEIR production cumulative traffic flows are not available and therefore have not been assessed, however, once traffic data for the cumulative developments is available, the Applicant will re-evaluate the need for a detailed traffic emissions assessment against the trigger criteria for the operational phase.
Chapter 8 - Air Quality	3.1.2	The Inspectorate	The ES should provide justification for not following the suggested distance of 350m from the boundary of the site and up to 500m from the site entrance for human receptors and 500m from the site entrance for ecological receptors. These distances are set out in the Institute of Air Quality Management (IAQM) Guidance on the assessment of dust from demolition and construction 2014. The ES should ensure that any distances used have been informed by potential for significant effects on sensitive receptors and not an arbitrary figure assigned to the assessment.	The Institute of Air Quality Management (IAQM) Guidance on the assessment of dust from demolition and construction 2014 has been replaced with a 2024 update (v2.2), which includes a different study area with a 250 m suggested distance for potential significant effects.
Chapter 8 - Air Quality	3.1.3	The Inspectorate	Paragraphs 6.4.8 – 6.4.10 of the Scoping Report outline the background data to be used in the assessment. This section also proposes a three-month survey using diffusion tubes to establish the nitrogen dioxide levels in the area immediately surrounding the site. As with all baseline information, the ES should justify how this is representative. It is not clear how this three-month survey period will be used to inform projections. Therefore, this approach should be fully justified in the ES.	An annualisation exercise will be undertaken to correct the period mean results obtained from the 3 months survey for seasonal bias. The annualisation methodology is detailed in **Appendix 8-A: Air Quality Baseline**, and includes details of the results used to inform background and/or verify traffic model outputs.
Chapter 8 - Air Quality	3.1.4	The Inspectorate	NRW raised in its representation that not all SSSI have been identified within the 15km study area. The Applicant should seek to agree designated sites for inclusion in the assessment with relevant consultation bodies. The Applicant should ensure that all sites and species are included in the ecological assessment and listed in a table such as Scoping Report Table 9-3.	A study area a 15 km has been used to consider potential effects on SSSIs in proximity to the Proposed Development with details provided in **Appendix 11-C: Preliminary Ecological Appraisal Report**. NRW will continue to be consulted on the Terrestrial and Aquatic Ecological assessment.
Chapter 8 - Air Quality	3.1.5	The Inspectorate	The Applicant should seek agreement with relevant consultation bodies that an assessment of the Proposed Development in unabated mode is not required to inform the worst-case assessment. This should be evidenced in the ES.	The air quality assessment, in Section 8.6 of **Chapter 8: Air Quality** (**PEIR Volume II**) has considered the difference between the current baseline and three future scenarios. One of these scenarios assesses Train 1 and Train 2 of the Proposed Development in unabated mode.
Chapter 8 - Air Quality	N/A	Flintshire County Council	There are no AQMAs designated near the proposed site, and local air quality monitoring indicates that there are no exceedances of the UK air quality objectives near the site. During construction there is the potential for effects on air quality as a result of increased traffic movements and generation of dust from construction activities. The Council have reviewed the Scoping Report Document (Reference 60717119) and the proposed methodologies within in it and can confirm that we have no adverse comments to make in terms of pollution control.	This information on the air quality baseline is acknowledged. Consideration of the potential effects identified is located in Section 8.6 of **Chapter 8: Air Quality** (**PEIR Volume II**).
Chapter 8 - Air Quality	N/A	Natural Resources Wales	In general, we are satisfied that the proposed scope of the air quality assessment appears reasonable and appropriate for a development of this type. However, we have the following detailed comments. Paragraphs 6.4.8 – 6.4.10 outline the background data to be used in the assessment, this approach appears appropriate. This section also proposes a three-month survey using diffusion tubes to establish the Nitrogen Dioxide levels in the area immediately surrounding the site. This will give further confidence in the background data used in the assessment. However, it is not clear how this three-month measurement period will be projected to the annual statistical data requirements for background measurements. Therefore, this approach should be fully justified in the ES.	An annualisation exercise has been undertaken to correct the period mean results obtained from the 3 months survey for seasonal bias. This allows the data to representative of the whole year. This is detailed in **Chapter 8: Air Quality** (**PEIR Volume II**).

Chapter	Comment ID (where applicable)	Consultee	Summary of Comment	Response
Chapter 8 - Air Quality	N/A	Natural Resources Wales	Paragraph 6.4.11 does not include all the Sites of Special Scientific Interest (SSSIs) located within 15km of the application site, as identified in Table 9-3 (Chapter 9) of the Scoping Report. We therefore advise that the air quality assessment considers all the SSSIs within 15km, as identified within Table 9-3.	Acknowleged, a study area of 15 km has been used to consider potential effects on SSSIs in proximity to the Proposed Development with details provided in **Appendix 11-C: Preliminary Ecological Appraisal Report**. NRW will continue to be consulted on the Terrestrial and Aquatic Ecological assessment.
Chapter 8 - Air Quality	N/A	Natural Resources Wales	Paragraph 6.5.2 states: "The Applicant's existing CCGT units at Connah's Quay Power Station will be on-site and operating during construction and potentially operating during periods coinciding with the operation of the Proposed Development. The existing Connah's Quay Power Station will therefore form part of the future baseline for the construction phase (which could commence in 2026 and last up to four years for Train 1 or combined single phase for Train 1 and Train 2) and potentially during the operational phase of the Proposed Development. Further information on the assumptions will be provided in the PEIR." This appears reasonable; however, we advise that an in-combination (i.e. existing power station plus proposed project) air quality assessment should also be completed.	A future scenario of the Proposed Development operating along with the existing CCGT units as set out in Section 2.2 of **Chapter 2: Assessment Methodology and Consultation** (**PEIR Volume II**) has been assessed within **Chapter 8: Air Quality (PEIR Volume II)**.
Chapter 8 - Air Quality	N/A	Natural Resources Wales	We note that paragraph 6.5.13 states: "AECOM has developed a screening model approach, in agreement with the Environment Agency, for assessment of emissions of amine degradation products from amine based CCP that includes consideration of both direct process emissions and indirect emissions generated through atmospheric degradation of amine post-release. This model approach will be utilised for the assessment of N-amines, subject to consultation with NRW, to assist with the establishment of appropriate stack heights and embedded mitigation." However, as full details have not been included in the Scoping Report, we are unable to comment further.	Full details of the model approach adopted has been included in **Chapter 8: Air Quality** (**PEIR Volume II**) and its supporting appendices (**PEIR Volume IV**).
Chapter 8 - Air Quality	N/A	Natural Resources Wales	We note that the Amines Chemistry module developed by Cambridge Environmental Research Consultants (CERC) for ADMS 6 will be used in the assessment of N-amine impacts, with parameters developed in consultation with the project engineers and technology providers, this information will be presented in the ES. However, as full details have not been included in the Scoping Report, we are unable to comment further.	Full details of the model approach adopted has been included in **Chapter 8: Air Quality** (**PEIR Volume II**) and its supporting appendices (**PEIR Volume IV**).
Chapter 8 - Air Quality	N/A	Natural Resources Wales	We note that operational traffic emissions have been scoped out of the ES as the increase in operational traffic is less than the recognised screening criteria. Whilst the average predicted vehicle movements during operation outlined in paragraphs 6.7.2 and 6.7.3 fall below the 500 Annual Average Daily Traffic (AADT) threshold for Light Duty Vehicles (LDV), the figure quoted (230 AADT) is close to 50% of this threshold. The Deeside area is currently experiencing elevated development pressure, including other projects associated with the HyNet carbon capture scheme as well as the redevelopment of Shotton Paper Mill. Given this context we advise that it would be precautionary (and in line with the principles outlined in the Wealden judgement, 2017) to scope operational vehicle movements into the ES and to consider these in-combination with other plans and projects to assess whether a cumulative effect would give rise to an exceedance of the screening threshold.	At the point of PEIR production cumulative traffic flows are not available and therefore not accessed, however, once traffic data for the cumulative developments is available, this will re-evaluate the need for a detailed traffic emissions assessment against the trigger criteria for the operational phase. Further information will be provided in the ES on this matter as required.
Chapter 8 - Air Quality	N/A	Flint Town Council	On behalf of Flint Town Council, please find the below proposals to be put forward as a scoping opinion for the Environmental Statement. • CO2/CO/ NOx emissions from the site currently and projected after completion. • Particulate emissions from the site currently and projected after completion. • Predicted construction emissions in terms of machinery.	The effects of the emissions referred to have been considered within the preliminary assessment presented in Section 8.6 of **Chapter 8: Air Quality** (**PEIR Volume II**).
Chapter 8 - Air Quality	N/A	Flint Town Council	Opportunities for innovative technologies zero carbon technologies for alternative fuels in the required vehicles as part of the construction phase to reduce the number of and impact of road haulage vehicles.	Prior to construction of the Proposed Development, the Applicant will consider opportunities for zero/low emission construction/plant vehicles. This will include investigation of potential opportunities for alternative fuels in the required vehicles to reduce the impact of road haulage during the construction phase.
Chapter 9 - Noise and Vibration	3.2.1	The Inspectorate	The Inspectorate is content that no works are required to the existing project elements and therefore there would be no construction impacts. This matter therefore can be scoped out of the assessment. Noise and vibration emitted from the existing project elements should however form part of the baseline for the assessment.	Noise and vibration emitted from the existing project elements forms part of the baseline for the assessment as presented in Section 9.4 of **Chapter 9: Noise and Vibration** (**PEIR Volume II**).

Chapter	Comment ID (where applicable)	Consultee	Summary of Comment	Response
Chapter 9 - Noise and Vibration	3.2.3	The Inspectorate	The Inspectorate is content that the Proposed Development would not change the noise and vibration emissions currently experienced from the existing project elements. Therefore, this matter can be scoped out the assessment. Noise and vibration emitted from the existing project elements should however form part of the baseline for the assessment.	Noise and vibration emitted from the existing project elements forms part of the baseline for the assessment as presented in Section 9.4 of **Chapter 9: Noise and Vibration** (**PEIR Volume II**).
Chapter 9 - Noise and Vibration	3.2.3	The Inspectorate	The Inspectorate is content that the level of traffic generated during operation is unlikely to result in a significant effect. However, the Inspectorate, noting the response by NRW and recognising that there is the potential for in-combination/ cumulative effects and impacts as a result of other Proposed Developments within the vicinity of the site, deem that further information is required on the likely cumulative traffic effects before this matter can be scoped out for noise. The Applicant is encouraged to discuss this and seek agreement from relevant consultation bodies.	To present a worst-case assessment, effects of operational traffic have been assessed in Section 9.6. of **Chapter 9: Noise and Vibration** (**PEIR Volume II**). **Chapter 10: Traffic and Transport** (**PEIR Volume II**) has considered the cumulative effects of the operational phase of the Proposed Development, with reference to traffic data from surrounding committed developments
Chapter 9 - Noise and Vibration	3.2.4	The Inspectorate	The Inspectorate is content that there are to be no vibration creating sources introduced as part of the Proposed Development and therefore this matter can be scoped out of the assessment.	This point is acknowledged. Operational vibration has been scoped out of the assessment.
Chapter 9 - Noise and Vibration	3.2.5	The Inspectorate	The Inspectorate directs the Applicant to comments in ID 2.1.12 which should be addressed in the ES in relation to decommissioning and therefore does not agree to scope out this matter on the information provided.	An assessment of the decommissioning phase has been included in Section 9.6 of **Chapter 9: Noise and Vibration** (**PEIR Volume II**).
Chapter 9 - Noise and Vibration	3.2.6	The Inspectorate	Table 7-1 [of the Scoping Report] sets out sensitive receptor locations within 300m for the construction assessment and within 1km for the operational assessment. The Applicant should clarify why impacts are likely beyond 300m during operation but not during construction. Effort should be made to agree the study area(s) with relevant consultation bodies.	Section 9.4 of **Chapter 9: Noise and Vibration** (**PEIR Volume II**) identified that the construction noise assessment study area was set at 300 m from the Site Boundary, based on BS 5228-1 guidance regarding spatial limitations of the prediction method and the higher noise thresholds used for construction noise assessment compared with assessment of operational sound. However, the construction noise study area has been extended up to 1 km from the Main Site and a further 300 m from the connection corridors and Construction and Indicative Enhancement Area that extend beyond the 1 km study area around the Main Site as part of sensitivity testing, to identify likely significant effects particularly when working outside core construction hours when lower noise thresholds are applied.
Chapter 9 - Noise and Vibration	N/A	Flintshire County Council	Planning/site constraints and opportunities: • TAN11 Noise generating Zone around some roads	This information is acknowledged.
Chapter 9 - Noise and Vibration	N/A	Flintshire County Council	The Council have reviewed the Scoping Report Document (Reference 60717119) and the proposed methodologies within in it and can confirm that we have no adverse comments to make in terms of pollution control.	The assessment methodologies are set out in Section 9.3 of **Chapter 9: Noise and Vibration** (**PEIR Volume II**). and **Appendix 9-A: Noise and Vibration Methodology** (**PEIR Volume IV**).
Chapter 9 - Noise and Vibration	N/A	Network Rail	The potential for any noise/ vibration impacts caused by the proximity between the proposed development and any existing railway must be assessed in the context of Planning Policy Wales and Technical Advice Notes which hold relevant national guidance information. The current level of usage may be subject to change at any time without notification including increased frequency of trains, night time train running and heavy freight trains.	The existing railway forms part of the baseline for the assessment presented in Section 9.4 of **Chapter 9: Noise and Vibration** (**PEIR Volume II**).
Chapter 9 - Noise and Vibration	N/A	Public Health Wales	We are encouraged that the relevant information has been included in the scoping document, such as the sections on Air Quality, Noise and Vibration and Health. We also welcome reference to the Wales Health Impact Assessment Support Unit Guidance and the Wellbeing of Future Generations Act in relation to formulating the human health impact assessment (HIA) for this project.	Effects on Human Health are assessed in Section 21.6 of **Chapter 21: Human Health** (**PEIR Volume II**).
Chapter 9 - Noise and Vibration	N/A	Flintshire County Council	FCC confirmed that the monitoring proposed in the scoping opinion was suitable.	Details of baseline monitoring are provided in Section 9.4 of **Chapter 9: Noise and Vibration** (**PEIR Volume II**) and **Appendix 9-B: Baseline Sound Level Survey** (**PEIR Volume IV**).
Chapter 10 - Traffic and Transport	3.3.1	The Inspectorate	The Inspectorate is content that the number of vehicle trips predicted for the 66 staff required at the site during operation and 14 HGV trips a day is unlikely to result in a significant effect. It is noted that this is predicted to increase to 230 AADT during years of maintenance. However, the Inspectorate, noting the response by NRW and recognising that there is the potential for in-combination/ cumulative effects as a result of other Proposed Developments within the vicinity of the site, deem that further information is	**Chapter 10: Traffic and Transport** (**PEIR Volume II**) has considered the cumulative effects of the operational phase of the Proposed Development, with reference to traffic data from surrounding committed developments. Further information will be provided in the ES once an agreement has been reached on the final shortlist of cumulative developments.

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			required on the likely cumulative effects before this matter can be scoped out for traffic movements. The Applicant is encouraged to discuss this and seek agreement from the relevant consultation bodies.	
Chapter 10 - Traffic and Transport	3.3.2	The Inspectorate	The Inspectorate directs the Applicant to comments in ID 2.1.12 which should be addressed in the ES in relation to decommissioning and therefore does not agree to scope out this matter on the information provided.	It is generally assumed that the environmental effects associated with the decommissioning phase would be no worse than those experienced during construction. Therefore, unless otherwise stated, decommissioning is not anticipated to present any significant environmental effects beyond those assessed for the construction phase of the Proposed Development and are not assessed separately in the **Chapter 10: Traffic and Transport** (**PEIR Volume II**).
Chapter 10 - Traffic and Transport	3.3.3	The Inspectorate	The Scoping Report notes the use of walkover surveys to inform the baseline, however it is not explained as to the purpose of these. There is no information provided in relation to traffic survey work to be undertaken although it is noted that traffic count data is listed under 'sources of information'. The baseline data collection methodology should be clearly set out in the ES and effort should be made to agree the approach with relevant consultation bodies.	Walkover surveys would be undertaken for the purpose of confirming baseline observations made by a desktop study. This is considered to be general practice and can help inform a greater understanding of the existing transport conditions surrounding the Proposed Development. Traffic Survey work was proposed within the 'Planned Surveys' section of the Scoping Chapter. This sets out the proposed locations for traffic survey, based on the likely routeing of construction / operational traffic to and from the Proposed Development. A summary of the baseline conditions is provided at Section 10.4 of **Chapter 10: Traffic and Transport** (**PEIR Volume II**). This includes the Automatic Traffic Count (ATC) surveys undertaken between Thursday 14th March 2024 and Wednesday 20th March 2024 and a further survey period between Thursday 18th April 2024 to Wednesday 24th April 2024
Chapter 10 - Traffic and Transport	3.3.4	The Inspectorate	When determining an appropriate assessment year and the forecasting method, the Applicant is requested to consider and comment in the ES on any implications of the Transport Analysis Guidance (TAG) "TAG Unit M4 - Forecasting and Uncertainty" (published by the Department for Transport (DfT) in 2023) for and the latest Traffic Modelling Projections 2022.	Reference has been made to this guidance within Section 10.3 of **Chapter 10: Traffic and Transport** (**PEIR Volume II**).
Chapter 10 - Traffic and Transport	3.3.5	The Inspectorate	Whilst the policy and guidance section in the Scoping Report correctly references the Institute of Environmental Management and Assessment (IEMA) Guidelines for the Environmental Assessment of Traffic and Movement published in 2023, the assessment criteria list reflects that of IEMA's now superseded Guidelines for the Environmental Assessment of Road Traffic (1993). The assessment in the ES should use the latest guidance or provide commentary to justify why it has not been followed.	**Chapter 10: Traffic and Transport** (**PEIR Volume II**) is reflective of the latest IEMA Guidance, with reference to the assessment criteria list for each phase of development. Details of the assessment methodology are provided in Section 10.3
Chapter 10 - Traffic and Transport	3.3.6	The Inspectorate	The ES should set out whether river transport could potentially be utilised in the construction and operation of the Proposed Development.	**Chapter 10: Traffic and Transport** (**PEIR Volume II**) assumes that river transport would be utilised during the construction phase to deliver Abnormal Indivisible Loads (AILs) to Port Mostyn and / or Connah's Quay North.
Chapter 10 - Traffic and Transport	N/A	Flintshire County Council	Planning/site constraints and opportunities: • Public Rights of Way within and surrounding the site	This point has been acknowledged and is discussed within Section 10.4 of **Chapter 10: Traffic and Transport** (**PEIR Volume II**).
Chapter 10 - Traffic and Transport	N/A	Flintshire County Council	Two PROW (66 & 67) form part of the network around Little Leadbrook Farm linking Leadbrook Drive to Allt Goch Lane which are affected by the proposed Repurposed CO2 Connection Corridor. The Scoping Report Document (Reference 60717119) suggests that these two PROW would be temporarily affected while the pipeline is repurposed. It is anticipated that one formal legal temporary closure (comprising both footpaths) would be required. There is no requirement to provide an alternative route while a route is temporarily closed but for routes of higher importance we would likely request alternatives so as to not detrimentally affect users. On-site management to minimise risks to users and potentially safeguard safe passage for pedestrians while keeping PROW open would be welcome if it is achievable but this would depend on each site. Risk Assessments and methodology of working re sought for each specific PROW affected if temporary closures were not to be pursued and on-site management sought.	The temporary impact upon PRoWs 66 and 67 during construction is considered in Section 10.6 **Chapter 10: Traffic and Transport** (**PEIR Volume II**). It is anticipated that the temporary disruption will be mitigated by a temporary diversion for the duration of the construction period, with no permanent changes to the PRoWs occurring.

Chapter	Comment ID (where applicable)	Consultee	Summary of Comment	Response
Chapter 10 - Traffic and Transport	N/A	Flintshire County Council	With regard to Public Footpath 28 in Connah's Quay, this route has been partially obstructed by vegetation for many years. The route connects to Public Footpath No. 27 in Connah's Quay, which is shown crossing the Chester - Holyhead railway line. The status of both Public Footpath 27 & 28 have been subject to scrutiny in recent years and there is doubt over there physical existence (more so Public Footpath 27). The alignment of Public Footpath 28 doesn't appear to be affected necessarily by the Indicative Enhancement Area, however the proposal as a whole project represents an opportunity to improve the network at this location as part of a wider community benefit. We would welcome engagement from the applicant further on in the process to discuss this matter.	The Applicant is in discussion within this matter with FCC. An updated position will be provided with as part of the application for development consent.
Chapter 10 - Traffic and Transport	N/A	Flintshire County Council	The Council is satisfied that Scoping Report Document (Reference 60717119) covers the key issues relating to traffic and transport. The Council note the content of the Chapter 8 'Traffic and Transport' scope and consider that the information will provide for a robust assessment of the traffic and transport impacts associated with the construction phase of the proposed development.	The position of FCC on the scope of the Traffic and Transport assessment is acknowledged.
Chapter 10 - Traffic and Transport	N/A	Flint Town Council	Opportunities to improve active travel routes in the area in line with Flintshire County Council definitive map for active travel routes in the area	Walking and cycling route allocations and improvements, as identified by FCC as part of their obligations under the Active Travel (Wales) Act 2013, are presented and discussed, as relevant to the Proposed Development within Section 10.4 of **Chapter 10: Traffic and Transport** (**PEIR Volume II**).
Chapter 10 - Traffic and Transport	N/A	Flint Town Council	Opportunities for innovative technologies zero carbon technologies for alternative fuels in the required vehicles as part of the construction phase to reduce the number of and impact of road haulage vehicles.	Prior to construction of the Proposed Development, the Applicant will consider opportunities for zero/low emission construction/plant vehicles. This will include investigation of potential opportunities for alternative fuels in the required vehicles to reduce the impact of road haulage during the construction phase
Chapter 10 - Traffic and Transport	N/A	Network Rail	During and post construction phase it is not clear whether transport or pedestrian routes will include those that cross a level crossing. Network Rail's position is that there shouldn't be any increase or change in usage to Level Crossings may require appropriate mitigation. The transport assessment should include an assessment of any level crossing used during the construction of the proposed development and future access routes to the site.	The ES Chapter and Transport Assessment will include consideration of level crossing usage, based on the proposed construction/ operation routeing of traffic to and from the Proposed Development.
Chapter 10 - Traffic and Transport	N/A	Maritime & Coastguard Agency	The MCA would expect that the impacts and effects in relation to shipping and navigation to be subject to further consideration by the applicant, including effects of transportation of AIL by vessel to the Port. It is our understanding that the site falls within the jurisdiction of a Statutory Harbour Authority (SHA) – Dee Conservancy. The SHA is responsible for maintaining the safety of navigation within their waters during the construction and the operational phase of the project. Therefore, the applicant should consult and work with the SHA to develop a robust Safety Management System (SMS) for the project in accordance with the Port Marine Safety Code (PMSC) and its associated Guide to Good Practice, to ensure that the risk and impact on other marine users are As Low As Reasonably Practicable (ALARP). Further local stakeholder engagement may also be required to determine the minimum acceptable provision and to determine the necessary risk mitigation measures for construction and operation of the project. From the Guide to Good Practice, section 7 Conservancy, a Harbour Authority has a duty to conserve the harbour so that it is fit for use as a port. The harbour authority also has a duty of reasonable care to see that the harbour is in a fit condition for a vessel to be able to use it safely. Section 7.8 Regulating harbour works covers this in more detail. The MCA would expect no effects to be scoped out of the assessment with regards to shipping and navigation, pending the outcome of the discussion with the SHA and further stakeholder consultation.	Dee Conservancy are to be engaged to discuss Shipping and Navigation and to agree whether this can be scoped out. The outcome of these discussions will be reported within the ES.
Chapter 11 - Terrestrial and Aquatic Ecology	3.4.1	The Inspectorate	Table 9-7 of the Scoping Report considers this potential impact pathway during construction but does not refer to it in respect of operation. As such, the Inspectorate understands that it is proposed to scope this matter out of the ES. The Inspectorate advises that the ES should assess the significance of any permanent habitat loss from the construction phase that would continue into the operational phase, and any habitat loss or degradation that could arise from operational air quality and water changes. The ES	Habitat loss / degradation is assessed for both temporary and permanent loss within the construction assessment presented in **Chapter 11: Terrestrial and Aquatic Ecology (PEIR Volume II).** Maintenance requirements that could affect designated sites and habitats during operation will be considered within the ES once these are defined. The Conservation Areas Management Plan has been reviewed and will need

Chapter	Comment ID (where applicable)	Consultee	Summary of Comment	Response
			should also describe any maintenance requirements that could affect designated sites and habitats during operation, including any temporary land take that may be required to facilitate these. Where any such activities could give rise to likely significant effects, an assessment should be provided in the ES.	to be considered alongside future plans / recommendations as part of the ES.
Chapter 11 - Terrestrial and Aquatic Ecology	3.4.2	The Inspectorate	The Scoping Report proposes to scope this matter out based on a lack of suitable habitat for dormouse. Paragraph 9.4.26 of the Scoping Report states that phase 1 habitat surveys completed in August 2021 and November 2023 concluded that habitats within the site provide limited opportunities for hazel dormouse and that there is limited connectivity with offsite habitats due to the site being surrounded by the River Dee and other development. The Preliminary Ecological Appraisal (Appendix B to the Scoping Report) states that the "site is close to the limits of the known UK distribution of this species." On that basis, the Inspectorate agrees that significant effects to hazel dormouse are unlikely to occur and this matter can be scoped out of the ES. The results of the phase 1 habitat surveys and any information obtained from local records should be reported in the ES.	The position on the agreement to scope of hazel dormouse is acknowledged.
Chapter 11 - Terrestrial and Aquatic Ecology	3.4.3	The Inspectorate	The Scoping Report proposes a study area of 15km around the main site to identify European designated sites, SSSI and National Nature Reserves (NNR) based on guidance for air quality impact assessment during operation. For avoidance of doubt, the Inspectorate understands that all European designated sites and SSSIs within 15km are being assessed for the effects listed are in Table 9-7. Based on the information presented, the Inspectorate considers that this is an appropriate study area but notes that Figure 9-1 shows several SSSIs and a Ramsar site outside but close to the 15km buffer. The Inspectorate advises that these sites should be assessed in the ES where there is potential for impacts to extend to them and result in LSE. Please note the comments from NRW regarding potential air quality impacts to SSSI, as noted in ID 3.1.4 of this Scoping Opinion.	A 15 km study area has been considered within the assessment presented in **Chapter 11: Terrestrial and Aquatic Ecology** (**PEIR Volume II**) The PEIR assessment only considers those within the 15 km study areas as identified in the PEA (**Appendix 11-C: Preliminary Ecological Appraisal Report** (**PEIR Volume IV**)). The PEA also provides further information on which designated sites have been scoped out of the assessment.
Chapter 11 - Terrestrial and Aquatic Ecology	3.4.4	The Inspectorate	Table 9-5 of the Scoping Report sets out the proposed ecological surveys and data collection, together with suggested scope, timing and survey extents. The Inspectorate considers that that proposed survey scope is acceptable subject to the following comments: • Final survey extents should be clearly described and illustrated on figures within the ES; • Paragraph 9.4.18 of the Scoping Report states that habitat surveys are proposed at all locations of permanent infrastructure construction, i.e. excluding the repurposed carbon dioxide (CO2) connection corridor and existing natural gas corridor, and areas of temporary land take/ disturbance, as well as the Indicative Enhancement Area. In finalising the survey extents, the Inspectorate advises that consideration should be given to any vegetation clearance and/ or maintenance activity required at the excluded connection corridors. Where such activity is proposed and could result in impact pathways to likely significant effects, the Inspectorate considers that these locations should also be subject to survey to establish sufficient understanding of the baseline; • In several instances, it is stated that survey extents would be within the Site and a buffer "where accessible". Where survey extent is limited due to access issues, the ES should explain what efforts were made to obtain access and how any gaps in survey data are proposed to be addressed; • For breeding bird surveys, NRW has, in its response, requested additional visits to be completed to determine the presence of crepuscular/ nocturnal species; • Consideration should be given to bird species records from local records and whether these indicate potential presence of additional ornithological receptors within the study area, e.g. breeding barn owl, which would require survey (and assessment in the ES); • Effort should be made to agree the scope, timing and extent of survey effort with relevant consultation bodies prior to survey work commencing. Evidence of any agreement or otherwise should be presented in the ES; and • Where it is ultimately determined to scope further survey effort out, for example it is stated that this could be the case for natterjack toad, bat roost presence/ absence, fish eDNA and terrestrial invertebrate the ES should provide an explanation of why this approach is appropriate together with evidence of any agreement with relevant consultation bodies; and • The ES should confirm the overall length of hedgerow likely to be affected by the Proposed Development across the DCO Order limits, and categorise the amount likely to be subject to temporary and/ or permanent effects.	All final survey extents will be clearly described and illustrated on figures within the ES and include the Proposed CO_2 Connection Corridor and Repurposed CO_2 Connection Corridor. The position that no further hazel dormouse and reptile surveys are required is acknowledged. A reptile survey report will be included with the ES as separate technical appendix. The ES and supporting appendices will explain the efforts made to obtain access and how any gaps in survey data have been addressed i.e. for GCN. The Applicant's planned nocturnal surveys to determine the use of the survey area by wading birds includes recording the presence of foraging barn owl which is readily detected by the use of thermal imaging monoculars. A habitat suitability assessment of all trees and buildings within the Site for suitability and occupancy of barn owl will also be undertaken. The findings of these surveys will be reported in the ES. Ten years' worth of data from 2013-2023 in relation to bird species has been obtained from Deeside Naturalist Society and will be used to inform the assessment to be presented in the ES. A summary of this data will also be included in the ES. As described in Section 11.2 of **Chapter 11: Terrestrial and Aquatic Ecology** (**PEIR Volume II**) it has been agreed with FCC that Natterjack Toad can be scoped out of further assessment. The ES will confirm the overall length of hedgerow likely to be affected by the Proposed Development and will identify both temporary and permanent effects.

Chapter	Comment ID (where applicable)	Consultee	Summary of Comment	Response
			Based on information presented in the Scoping Report and Appendix B Preliminary Ecological Appraisal, the Inspectorate agrees that: • no further hazel dormouse survey is required, noting there is limited habitat and/ or connection to suitable offsite habitat for hazel dormouse; and • no further reptile survey is required, noting the surveys completed in April 2022 concluded potential for small numbers of common reptiles to be present within the Indicative Enhancement Area only and the habitat is largely unchanged since the survey. The Inspectorate advises that survey work should be summarised in the ES and survey reports should be provided as technical appendices to the ES.	The Applicant are engaging with NRW through their discretionary advice service and FCC via Planning Performance Agreement on survey scope, timing and extent.
Chapter 11 - Terrestrial and Aquatic Ecology	3.4.5	The Inspectorate	The Scoping Report summarises the findings of bird surveys completed to date. The Inspectorate notes that there appears to be a discrepancy between information presented in the Scoping Report main text, and that in the preliminary ecological appraisal (and annexes) at Appendix B of the Scoping Report. For example, the Scoping Report main text does not refer to the presence of curlew, a qualifying feature of the Dee Estuary Special Protection Area (SPA) but paragraph 2.10.5 of the preliminary ecological appraisal states that there are "large numbers of foraging curlew… present within these habitats at the time of the field surveys." The assessment in the ES should be based on a robust baseline, which should be described consistently with survey and other data gathered.	All bird records historical and collected as part of this application will be clearly presented alongside an impact assessment in the ES. **Appendix 11-D: Ornithology Baseline** (**PEIR Volume IV**) and information presents a summary of the information collated and reviewed to date.
Chapter 11 - Terrestrial and Aquatic Ecology	3.4.6	The Inspectorate	The Scoping Report states that a HRA is proposed and would be prepared in accordance with the Inspectorate's Advice Note Ten: Habitats Regulations Assessment (AN10) The Inspectorate advises that the findings of the HRA should be used to inform the assessment in the ES. Whilst not of direct relevance to the ES, the Inspectorate notes that AN10 no longer requires provision of matrices as part of the HRA report(s).	This information is acknowledged and will be considered during the preparation of the HRA report(s).
Chapter 11 - Terrestrial and Aquatic Ecology	3.4.7	The Inspectorate	For several potential embedded mitigation measures, the Scoping Report states that these would be implemented "as far as reasonably practicable". This includes avoidance of nesting bird season for habitat clearance works and routing of connection corridors to avoid sensitive habitats/ use of non-intrusive construction techniques at the Pentre Brook/ Lead Brook tributary. Where it is unclear if such mitigation can be achieved and/ or secured, the assessment should consider the worst case without the measures and identify any additional mitigation that would be required to address LSE arising.	This position is acknowledged and has been used to inform the assessment presented in Section 11.8 of Chapter 11: Terrestrial and Aquatic Ecology (**PEIR Volume II**).
Chapter 11 - Terrestrial and Aquatic Ecology	3.4.8	The Inspectorate	For the avoidance of doubt, the Inspectorate understands that the assessment of habitat loss/ temporary land take and disturbance and degradation of ecological features, particularly from dust/ air quality change will include consideration of hedgerow and ancient woodland.	Air quality impacts on hedgerows have only been considered in relation to construction dust (following the results of the hedgerow survey which will be presented in the ES). A preliminary discussion on the potential effects of changes in air quality on ancient woodland is presented in **Chapter 11: Terrestrial and Aquatic Ecology** (**PEIR Volume II**).
Chapter 11 - Terrestrial and Aquatic Ecology	3.4.9	The Inspectorate	Paragraphs 9.4.27 and 9.4.37 of the Scoping Report refer to survey work considering potential for presence of terrestrial and aquatic INNS but the effects section does not include potential for spread of INNS as an impact pathway. Section 4.1 of the Phase 1 Habitat and Fauna Survey (Appendix B of the Scoping Report) states that there are records of Japanese Knotweed, Himalayan Balsam and Cherry Laurel, although the site survey did not identify their presence. The Inspectorate advises that the ES should identify and describe any INNS present in the baseline and include an assessment where significant effects are likely to occur, or otherwise explain why significant effects are not likely with evidence of agreement with relevant consultation bodies.	Botanical Survey Reports to be included within the ES will include / identify Invasive Non-Native Plant Species. Aquatic Ecology Survey Reports to be included within the ES will also cover INNS (flora and fauna) in waterbodies / watercourses.
Chapter 11 - Terrestrial and Aquatic Ecology	3.4.10	The Inspectorate	It is noted that vibration is included at Table 9-7 of the Scoping Report but not listed in the separate paragraphs describing potential effects. For the avoidance of doubt, the Inspectorate understands that in addition construction noise, the assessment would assess the construction vibration where significant effects are likely to occur.	In Section 11.6 of **Chapter 11: Terrestrial and Aquatic Ecology** (**PEIR Volume II**), the PEIR describes where Important Ecological Features could experience disturbance from vibration and presents a preliminary discussion of the potential effects. The ES will provide a full assessment construction vibration on important ecological features, where significant effects are likely to occur.
Chapter 11 - Terrestrial and Aquatic Ecology	3.4.11	The Inspectorate	Paragraph 9.7.6 of the Scoping Report states that entrainment, impingement and disruption to migration routes will be assessed in the marine ecology ES chapter but Table 9-7 states it is scoped in for terrestrial and aquatic ecology. This matter is also scoped in with reference to "marine ecology" in Table 10-2 of the Scoping Report. For the avoidance of doubt, potential effects to fish (including eels and lamprey) from entrainment, impingement or other disruption to migration routes during operation should be assessed in the ES, together with any other impact pathways during construction and operation that could give rise to likely significant effects. The Inspectorate is content for this to be presented in either	Section 12.6 of **Chapter 12: Marine Ecology** (**PEIR Volume II**) provides a preliminary assessment of entrainment and impingement effects on marine ecology. This will be considered in further detail within the Marine Ecology chapter presented in the ES when the design of the Proposed Development has been confirmed.

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			the terrestrial and aquatic ecology or marine ecology ES chapter with cross-referencing as necessary, provided that all potentially affected watercourses, e.g. rivers, intertidal and marine areas are assessed. Paragraph 10.4.4 of the Scoping Report states that the requirement for upgraded or replacement eel screens is assessed as part of Chapter 9.0 Terrestrial and Aquatic Ecology but there is no reference to eel screens in section 9 of the Scoping Report. The need for upgraded or replacement eel screens, and any intake screens as mitigation for other impacts to other migratory Annex II fish species, should be identified in the ES; if required, they should be demonstrably secured through the DCO. The Applicant's attention is drawn to the comments of NRW (see Appendix 2).	
Chapter 11 - Terrestrial and Aquatic Ecology	3.4.12	The Inspectorate	The Applicant's attention is drawn to the comments of NRW (see Appendix 2), which state that there is a conservation management plan in place at the Proposed Development site providing mitigation for previous developments. The description of the baseline in the ES should include consideration of the plan and targets it is required to meet. The ES should confirm how any mitigation for the Proposed Development would relate to this plan.	A detailed review of the existing Conservation Area Management Plan is being undertaken as part of the ongoing work on the application for the Proposed Development. This work will inform the assessment presented in the ES and HRA Report(s).
Chapter 11 - Terrestrial and Aquatic Ecology	3.4.13	The Inspectorate	Public bodies have a responsibility to avoid releasing environmental information that could bring about harm to sensitive or vulnerable ecological features. Specific survey and assessment data relating to the presence and locations of species such as badgers, rare birds and plants that could be subject to disturbance, damage, persecution, or commercial exploitation resulting from publication of the information, should be provided in the ES as a confidential annex. All other assessment information should be included in an ES chapter, as normal, with a placeholder explaining that a confidential annex has been submitted to the Inspectorate and may be made available subject to request.	Confidential information will be included in confidential appendices of the ES as required. These will not be available to the public.
Chapter 11 - Terrestrial and Aquatic Ecology	N/A	Flintshire County Council	Planning/site constraints and opportunities: • Areas of Ancient Woodland Mixed woodland to the south of the site.	Areas of ancient woodland have been mapped and are shown on **Figure 11C-3: Ancient Woodland and Priority Habitats within 2 km**. These areas considered within Section 11.6 of **Chapter 11: Terrestrial and Aquatic Ecology** (**PEIR Volume II**).
Chapter 11 - Terrestrial and Aquatic Ecology	N/A	Flintshire County Council	Planning/site constraints and opportunities: • Dee Estuary / Aber Dyfrdwy Special Area Conservation (SAC) and Site of Special Scientific [Scientific] Interest (SSSI), and Wildlife Sites to the south of the site	These sites have been considered within the **Chapter 11: Terrestrial and Aquatic Ecology** (**PEIR Volume II**).
Chapter 11 - Terrestrial and Aquatic Ecology	N/A	Flintshire County Council	The Council is satisfied that Scoping Report Document (Reference 60717119) covers the key ecological issues associated with the site and its locality and that the Assessment will also be informed by other specialist assessments relating to Air Quality, Noise and Vibration, Marine Ecology and the Water Environment. The proposed Ecological Surveys and data collection table 9-5 based on the Preliminary Ecological Appraisal Report is acceptable.	The position of FCC on the scope of the assessment is acknowledged.
Chapter 11 - Terrestrial and Aquatic Ecology	N/A	Flintshire County Council	In addition we note that the Deeside Naturalist's Society Reserve is referenced as an ecological sensitive habitat and we would recommend discussions with this organisation in regards to specific local features - plants and insects etc. as well as birds.	Engagement has been ongoing with the DNS as a key non-statutory stakeholder and will continue as the application progresses .
Chapter 11 - Terrestrial and Aquatic Ecology	N/A	Flintshire County Council	Chapter 6 'Air Quality' makes reference to the sensitive ecological receptors namely designated sites plus ancient woodland and local wildlife sites within the locality. 'Noise and Vibration' (Chapter 7) also has the potential to impact the designated sites/features during construction and operation and ecological sensitive receptors for noise/vibration do not appear to be specifically referenced. The Council believes they should be considered.	Where relevant the assessment within the PEIR draws on the conclusions of the preliminary air quality and noise and vibration assessments presented in **Chapters 8** and **9** (**PEIR Volume II**) respectively, and their supporting appendices (**PEIR Volume IV**).
Chapter 11 - Terrestrial and Aquatic Ecology	N/A	Flintshire County Council	Technical appendices will include Habitat regulations assessment, which is welcomed, as is a Net Benefit for Biodiversity assessment. The biodiversity metric proposed to be used is acceptable providing that habitat and species proposals are considered together with biodiversity benefit and ecosystem resilience.	These points are acknowledged.
Chapter 11 - Terrestrial and Aquatic Ecology	N/A	Flintshire County Council	We would we welcome further discussion in Net Benefit for Biodiversity and potential mitigation options.	Ongoing engagement is taking place with FCC in relation to NBB.
Chapter 11 - Terrestrial and Aquatic Ecology	N/A	Deeside Naturalists Society	Curlew are one of the qualifying migratory species for the SPA/Ramsar designation, therefore we suggest there is more focus within the Scoping Report on fully researching the importance of the migratory Curlew population using the site, and assessing this in the context of the SPA/Ramsar site	The ES the Applicant will make a wider assessment of curlew and the pattern of use across the estuary which identifies the importance of the survey area for this species. **Appendix 11-D: Ornithology Baseline and**

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			Curlew population to enable an effective mitigation and compensation strategy to be designed and implemented.	**Information** presents a summary of the baseline data collected and reviewed to date. An updated version of this appendix will be presented in the ES to consider the results of ongoing surveys and additional information obtained from third parties.
Chapter 11 - Terrestrial and Aquatic Ecology	N/A	Deeside Naturalists Society	Deeside Naturalists Society has a wealth of bird data, and Uniper has much other data gathered by various bird watchers for at least 20 years (not all of which is in the public domain) and other biodiversity data from the development area that should be used in helping assess both the impact of the development at the EIA stage, and in supporting the design of mitigation and compensation for Curlews and other wading birds using the area proposed for development.	The Applicant is engaging with DNS and would welcome the opportunity to review any additional information that has not currently been supplied in order to allow a more robust assessment of the historical baseline to be made for the ES.
Chapter 11 - Terrestrial and Aquatic Ecology	N/A	Deeside Naturalists Society	We note that one of the purposes of the PEA is 'to begin to identify requirements for mitigation, including mitigation measures that will be required and those that may be required (depending on results of further surveys or final Proposed Development design). We cannot find any mitigation/compensation measures suggested so far for the impact on wintering Curlews. We wish to comment that this will be difficult to do as Curlews are known to have a high level of site fidelity to wintering areas.	The ES will provide details of any mitigation / compensation measures identified through the impact assessment process. Until survey work is complete, it is not possible to fully evaluate the seasonal pattern of use of fields within the Site and therefore propose appropriate mitigation measures. Initial commentary on these is provided in Section 11.8 of **Chapter 11: Terrestrial and Aquatic Ecology** (**PEIR Volume II**).
Chapter 11 - Terrestrial and Aquatic Ecology	N/A	Deeside Naturalists Society	We note that the Scoping Report main text does not mention the importance of the development site for foraging Curlews within Section 9.4.32. We consider that this is a major omission. We suggest adding the text from the PEA: 2.10.5 Large numbers of foraging curlew (Numenius arquata) were present within these habitats at the time of the field surveys. And adding that this is one of the qualifying migratory species for the SPA/Ramsar designation.	The Applicant notes the value of the site to foraging curlew but, is at an early stage of assessing the value and pattern of use. A full assessment of the use of the Main Site and surrounding area will be made in the ES. **Appendix 11-D: Ornithology Baseline and Information** presents a summary of the baseline data collected and reviewed to date. An updated version of this appendix will be presented in the ES to consider the results of ongoing surveys and additional information obtained from third parties.
Chapter 11 - Terrestrial and Aquatic Ecology	N/A	Natural Resources Wales	The ES should include sufficient information to enable the decision makers to determine the extent of any environmental impacts arising from the proposed scheme on legally protected species, including those which may also comprise notified features of designated sites affected by the proposals. Evaluation of the impacts of the proposed scheme should include: direct and indirect; secondary; cumulative; short, medium and long-term; permanent and temporary; positive and negative, and construction, operation and decommissioning phase and long-term site security impacts on the nature conservation resource, landscape, and public access.	The ES will be supported by Survey Reports as technical appendices which will include a detailed account of the baseline surveys undertaken and their results. Section 11.6 of **Chapter 11 Terrestrial and Aquatic Ecology** (**PEIR Volume II**) presents a preliminary assessment of the effects of the Proposed Development and considers the potential impacts noted by NRW.
Chapter 11 - Terrestrial and Aquatic Ecology	N/A	Natural Resources Wales	Within the ES, the proposed scheme should be described in detail in its entirety. This description should cover construction, operation, and decommissioning phases as appropriate and include detailed, scaled maps and drawings as appropriate. Any maps, drawings and illustrations that are produced to describe the project should be designed in such a way that they can be overlaid with drawings and illustrations produced for other sections of the ES, such as biodiversity.	The Proposed Development is described in **Chapter 4: The Proposed Development** (**PEIR Volume II**). The ES and plans to be included as part of the application for development consent will provide further information on the Proposed Development. Figures supporting **Chapter 5: Construction Programme and Management** (**PEIR Volume III**) illustrate the anticipated construction working area.
Chapter 11 - Terrestrial and Aquatic Ecology	N/A	Natural Resources Wales	The ES should include a description of all the existing natural resources and wildlife interests within and in the vicinity of the proposed development, together with a detailed assessment of the likely impacts and significance of those impacts.	A preliminary assessment is presented in **Chapter 11: Terrestrial and Aquatic Ecology** (**PEIR Volume II**) and full assessment will be presented in the ES.
Chapter 11 - Terrestrial and Aquatic Ecology	N/A	Natural Resources Wales	We advise that the ES considers significance (both alone and in-combination) and where applicable, conservation status. In respect of conservation status, we advise consideration is given to current conservation status (CCS), and demonstration of no likely detriment to the maintenance of favourable conservation status (FCS) during construction, operation, and decommissioning phases of the scheme. In respect of paragraph 9.5.4 (scales of importance), we advise that consideration is also given to the FCS of each species assessed.	The assessment methodology for the Terrestrial and Aquatic Ecology Assessment is presented in **Appendix 11-A: Ecological Impact Assessment Methodology** which identifies that effects are considered in the context of conservation status (where applicable).
Chapter 11 - Terrestrial and Aquatic Ecology	N/A	Natural Resources Wales	Any habitat surveys should accord with the NCC Phase 1 survey guidelines (NCC (1990) Handbook for Phase 1 habitat survey. NCC, Peterborough). We advise that Phase 1 surveys are undertaken and	Acknowledged. However, as noted in paragraph 9.4.21 of the Scoping Report (**Appendix 1-A: Connah's Quay Scoping Report**), the Applicant has proposed UKHab Survey Methodology which is a CIEEM (Chartered

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			completed during the summer to ensure the best chance of identifying the habitats present. We also advise that Habitats Directive Annex 1 habitats are identified as part of this assessment.	Institute of Ecology and Environmental Management) approved method. UKHab is designed to identify Annex 1 habitats. Best practice optimal period for survey is generally April to September (JNCC, 2010), which aligns with the Applicant's proposed survey dates.
Chapter 11 - Terrestrial and Aquatic Ecology	N/A	Natural Resources Wales	We advise that the site is subject to assessment to determine the likelihood of protected species being present and that targeted species surveys are undertaken for all species scoped in. These should comply with current best practice guidelines and in the event that the surveys deviate, or there are good reasons for deviation, full justification for this should be included within the ES.	Details of the ongoing and future surveys are provided in **Chapter 11: Terrestrial and Aquatic Ecology** (**PEIR Volume II**).
Chapter 11 - Terrestrial and Aquatic Ecology	N/A	Natural Resources Wales	Should protected species be found during the surveys, information should be provided identifying the species-specific impacts in the short, medium, and long-term together with any mitigation and compensation measures proposed to offset the impacts identified. We advise that the ES sets out how the long-term site security of any mitigation or compensation will be assured, including management and monitoring information and long-term financial, tenure, and management responsibility. Where the potential for significant impacts on protected species is identified, we advise that a Conservation Plan is prepared for the relevant species and included as an Annex to the ES.	. Further information on the requirements for Conservation Plans will be included in the ES.
Chapter 11 - Terrestrial and Aquatic Ecology	N/A	Natural Resources Wales	We generally concur with the proposed approach to protected species surveys outlined in Table 9-5. However, while the breeding bird surveys are broadly appropriate for diurnal bird species, additional visits should be completed to determine the presence of crepuscular/nocturnal species such as the Schedule 1 listed barn owl. We would refer the applicant to the CIEEM guidelines for bird surveys (Bird Survey Guidelines for assessing ecological impacts) in this regard.	Further consideration is being given to the potential presence of barn owl in the vicinity of the Proposed Development, and the relevant findings will be documented in the ES.
Chapter 11 - Terrestrial and Aquatic Ecology	N/A	Natural Resources Wales	With reference to paragraph 9.4.36, we note that "Technical engagement / consultation with Natural Resources Wales is also proposed to discuss and agree the scope of ornithological surveys." We would welcome further engagement with the applicant regarding this.	The Applicant is engaging with NRW and full details of this technical engagement will be provided in the ES.
Chapter 11 - Terrestrial and Aquatic Ecology	N/A	Natural Resources Wales	The Preliminary Ecological Appraisal (PEA, Appendix B) and relevant annexes do not appear to contain a robust summary of the bird species records returned from the local biological records centre. It is therefore not clear whether all ornithological receptors have been sufficiently identified and considered within the PEA and relevant annexes. For example, the application boundary appears to provide areas suitable for foraging, and possibly breeding, barn owl. Therefore, while we broadly concur with the birds that have been scoped in (Table 11-7), additional bird species may need to be considered for the ES.	A full assessment of all potential ornithological receptors (i.e. important ecological receptors) will be presented in the ES following the completion of surveys and analysis of the data. Receptors will be based on both historical and collected data. The existing baseline information is summarised in **Appendix 11-D: Ornithology Baseline and Information** (**PEIR Volume IV**).
Chapter 11 - Terrestrial and Aquatic Ecology	N/A	Natural Resources Wales	We note that a conservation management plan is currently in place at the site, secured as mitigation for previous developments at this location. This involves areas of the site being managed for estuarine birds. However, no details have been provided to confirm if the applicant intends to continue to maintain or enhance the management of the site for estuarine birds. We would welcome further dialogue with the applicant regarding this.	.Further information on the management of habitats within the Indicative Site Boundary and wider Uniper site will be included in the ES following discussion with NRW.
Chapter 11 - Terrestrial and Aquatic Ecology	N/A	Natural Resources Wales	Section 9.7.6 (Aquatic Ecology): we note that a number of watercourses are identified in Chapter 11, Water Environment and Flood Risk, Table 11-1. We therefore advise that impacts to fish, in particular European eel and Annex II species, are considered further in the Aquatic Ecology section of the ES.	As detailed in Section 11.6 **of Chapter 11:Terrestrial and Aquatic Ecology** (**PEIR Volume II**), surveys are ongoing for aquatic ecology in Q4 2024 to determine the presence/likely absence of aquatic ecological features which may be potentially impacted by the Proposed Development. Once aquatic surveys are completed, the data and samples will be assessed and the level of effects predicted for aquatics. Impacts to fish will be fully considered at all sites where the development and operation of the Proposed Development is likely to cause impact to watercourses in the ES.
Chapter 11 - Terrestrial and Aquatic Ecology	N/A	Natural Resources Wales	The scoping report highlights that potential impacts on birds include noise, light and visual disturbance during construction and operation, and permanent loss of habitat. We acknowledge that the preliminary bird surveys detected large numbers of birds, many of which are features of the Dee Estuary Special Protection Area (SPA) and other designated sites, and we note that further surveys are proposed. We advise that Shotton Lagoons and Reedbeds SSSI and Inner Marsh Farm SSSI should also be scoped in for the construction, operation, and maintenance phases of the development.	Acknowledged. Shotton Lagoons and Reedbeds SSSI and Inner Marsh Farm SSSI have been considered within **Chapter 11: Terrestrial and Aquatic Ecology** (**PEIR Volume II**). A full list of designated sites considered within the preliminary assessment is presented in **Chapter 11: Terrestrial and Aquatic Ecology** (**PEIR Volume II**).

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Chapter 11 - Terrestrial and Aquatic Ecology	N/A	Natural Resources Wales	As the proposed works may cause disturbance impacts during construction, operation, and maintenance, we advise that a sensitivity assessment is undertaken and the applicant considers, for example, Cutts et al. (2009) regarding this (Cutts, N., Phelps, A. & Burdon D. 2009. Construction and waterfowl: Defining sensitivity, response, impacts and guidance. Report to Humber INCA).	The sensitivity assessment will be undertaken following the completion of all relevant surveys and will be reported in the ES. The guidance provided in Cutts et al. (2009) will be reviewed and considered as part of the sensitivity assessment.
Chapter 11 - Terrestrial and Aquatic Ecology	N/A	Natural Resources Wales	We advise that further information on the nature and extent of the proposed permanent loss of habitat, and its effects on bird features, is provided in the ES.	The ES will make an assessment of all permanent habitat loss on all ornithological receptors (important ecological features) that will be based on the historical and current baseline ornithological data.
Chapter 11 - Terrestrial and Aquatic Ecology	N/A	Natural Resources Wales	The determining authority for the DCO application is the Competent Authority for the purposes of the Conservation of Habitats and Species Regulations 2017 (as amended). As such, they must not agree to any plan or project unless they are certain it will not adversely affect the integrity of a Special Area of Conservation (SAC), Special Protection Area (SPA) and/or Ramsar site. The determining authority should carry out a test of likely significant effects (TLSE) for the relevant SAC/SPA/Ramsar sites, which is required under Regulation 63 of the Conservation of Habitats and Species Regulations 2017 (as amended). This test applies to impacts on the sites from the proposed works, either alone or in-combination with other plans and projects. If the test concludes there is likely to be a significant effect, then an Appropriate Assessment of the impacts on the SAC/SPA/Ramsar sites from the proposed works, either alone or in-combination with other plans and projects, will be required. We would be able to assist with that assessment in our role as the Statutory Nature Conservation Body under the above Regulations.	A Habitats Regulations Assessment (HRA) will be undertaken with reference to the general European Commission (EC) guidance on HRA, general guidance on HRA published by the UK Government in July 2019 and PINS Advice Note 10. Stage 1 of the HRA process, screening for likely significant effects, is currently in progress. Should it be determined that a conclusion of 'no Likely Significant Effect' on the integrity of Habitats sites cannot be drawn at the screening stage, the HRA assessment will proceed HRA Stage 2, Appropriate Assessment. NRW will be engaged through their DAS service during the initial screening process to agree habitats sites to be incorporated into the HRA and that all potential impact pathways have been identified.
Chapter 11 - Terrestrial and Aquatic Ecology	N/A	Natural Resources Wales	The Wildlife and Countryside Act 1981 (as amended) places a duty on public authorities in exercising their functions, so far as this is likely to affect the flora, fauna, geological or physiographical features of a SSSI, to take reasonable steps consistent with the proper exercise of their functions to further the conservation and enhancement of those features. We refer you to our website for further advice.	Requirements of The Wildlife and Countryside Act 1981 (as amended) have been considered, where relevant, throughout the PEIR documentation.
Chapter 11 - Terrestrial and Aquatic Ecology	N/A	Natural Resources Wales	We recommend that the applicant consults the local authority ecologist on the scope of the assessment to ensure that regional and local biodiversity issues are adequately considered, particularly those habitats and species listed in the relevant Local Biodiversity Action Plan, and areas that are considered important for the conservation of biological diversity in Wales.	Details of engagement with the FCC County Ecologist will be included in the ES. Section 11.2 of **Chapter 11: Terrestrial and Aquatic Ecology** (**PEIR Volume II**) provides a summary of engagement to date with FCC.
Chapter 11 - Terrestrial and Aquatic Ecology	N/A	Natural Resources Wales	We would advise the applicant to contact other relevant people/organisations for biological information/records relevant to the site and its surrounds. These include the relevant Local Records Centre and any local ecological interest groups (e.g. bat groups, mammal groups).	Biological information/records have been obtained from Cofnod (biodiversity records centre for the region) and are detailed in **Appendices 11A-H** (**PEIR Volume IV**) as relevant.
Chapter 11 - Terrestrial and Aquatic Ecology	N/A	Natural Resources Wales	We advise that provisions of the EIA audit compliance in respect of relevant nature conservation legislation (UK and Wales) together with relevant local and national policies, including BS 42020:2013.	The ES will be produced in compliance with relevant legislation, policy and guidance . Details of relevant legislation and policy that has been considered for the PEIR is provided in **Chapter 11: Terrestrial and Aquatic Ecology** (**PEIR Volume II**).
Chapter 11 - Terrestrial and Aquatic Ecology	N/A	Natural Resources Wales	Throughout the PEA and relevant annexes there is reference to Section 40 of the Natural Environment and Rural Communities (NERC) Act 2006. This has been superseded in Wales by the Environment (Wales) Act 2016. We therefore advise that the documents are amended to correct this and ensure that they refer to the relevant Welsh legislation and policy.	References to the NERC Act have been removed throughout the PEIR documentation.
Chapter 11 - Terrestrial and Aquatic Ecology	N/A	Natural Resources Wales	We advise that, in accordance with Planning Policy Wales, the application demonstrates how it will deliver a net benefit for biodiversity and thus contribute to promoting ecosystem resilience.	Opportunities to deliver net benefit for biodiversity (NBB) are being considered as part of ongoing design work for the Proposed Development and will be included as part of the application. Further details will be provided in the ES
Chapter 11 - Terrestrial and Aquatic Ecology	N/A	Flint Town Council	They [the Applicant] advised they [the Applicant] are responsible for management of SSSI at the briefing meeting. Can we [FCC] have an impact assessment of what future plans they have for the site and what they will do during construction to mitigate risk.	The existing maintenance plan for the SSSI will be reviewed and considered alongside the design and management proposals for the Proposed Development. Details will be provided in the ES.

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Chapter 11 - Terrestrial and Aquatic Ecology	N/A	Natural Resources Wales	Paragraph 11.4.4: we note the requirement to implement intake screens to comply with the Eels Regulations 2009 has been recognised and that this will be considered in Chapter 9 (Terrestrial and Aquatic Ecology) of the ES. We advise that intake screens should also be designed to minimise impacts to migratory Annex II fish species, which are features of the Dee Estuary SAC and River Dee and Bala Lake SAC.	The Terrestrial and Aquatic Ecology assessment which will be presented in the ES will confirm that the eel screens comply with the Eels Regulations 2009 and it has been noted that the intake screens should also be designed to minimise impacts to migratory Annex II fish species. This will be assed in the Marine Ecology ES chapter.
Chapter 12 - Marine Ecology	3.5.1	The Inspectorate	Based on the distance between the Proposed Development and the closest MCZ (Fylde MCZ, which is more than 50km at the closest point), and absence of potential impact pathways, the Inspectorate agrees that this matter can be scoped out of the assessment	This position on the scope of the assessment and scoping out consideration of MCZs is acknowledged.
Chapter 12 - Marine Ecology	3.5.2	The Inspectorate	Whilst this is not identified as a matter to be scoped out in Table 10- 2, the Inspectorate notes that the assessment is proposed to be spatially limited to activities in the water connection corridor (shown on Figure 1-3 of the Scoping Report) rather than a defined Zone of Influence (ZoI) for potential impacts. The Inspectorate does not have sufficient information about the operational phase works to exclude the possibility of likely significant effects from this impact pathway. Consideration should be given to whether habitat loss could occur e.g. from maintenance dredging and hydromorphological changes including ongoing scour. Where significant effects are likely, these should be assessed in the ES.	No maintenance dredging currently takes place at the Existing Connah's Quay Power Station and no permit/licence is in place. The working assumption of the Applicant is that maintenance dredging will not be required on the basis of the existing operation and any re-use, refurbishment or new cooling water intake infrastructure will be designed to avoid dredging. Should maintenance dredging be required, samples will be required for chemical analysis, by benthic survey.
Chapter 12 - Marine Ecology	3.5.3	The Inspectorate	The Scoping Report states that river and land-based activities have potential to disturb seals that have surfaced or hauled out but due to the intervening distance between the Proposed Development and the nearest haul out site at Hilbre Island (more than 15km downstream) there will be no available pathway. Ornithological receptors will be considered in the terrestrial and aquatic ecology ES chapter. Based on information presented in the Scoping Report, the Inspectorate agrees that significant effects are not likely to occur and this matter can be scoped out of the assessment. Please note the Inspectorate's comments at ID 3.5.9 of this Scoping Opinion regarding receptors to be considered in relation to underwater noise and vibration during construction.	This position on the scope of the construction phases assessment is acknowledged.
Chapter 12 - Marine Ecology	3.5.4	The Inspectorate	Whilst this is not identified as a matter to be scoped out in Table 10-2 of the Scoping Report, the Inspectorate notes that it is scoped in for the construction phase for in-river works. It is unclear whether there could be in-river works during operation e.g. maintenance of the outfall and/ or maintenance dredging involving vessels that could result in impact pathways. The Inspectorate advises that this should be clarified in the ES, together with an assessment of any likely significant effects.	No maintenance dredging currently takes place at the Existing Connah's Quay Power Station and no permit/licence is in place. The working assumption of the Applicant is that maintenance dredging will not be required (including during maintenance of the outfall) on the basis of the existing operation and any re-use, refurbishment or new cooling water intake infrastructure will be designed to avoid dredging. Should maintenance dredging be required, samples will be required for chemical analysis, by benthic survey.
Chapter 12 - Marine Ecology	3.5.5	The Inspectorate	The Scoping Report states that the operational phase will not result in changes to underwater sound or visual disturbance that would impacts marine habitats or species. Based on the information presented in the Scoping Report, the Inspectorate agrees that significant effects are not likely to occur. This matter can be scoped out of the assessment.	This position on the scope of the operational phases assessment is acknowledged.
Chapter 12 - Marine Ecology	3.5.6	The Inspectorate	The Scoping Report states that there is uncertainty about the construction methodology for works within the water connection corridor, but the maximum area required is shown on Figure 1-3 in Appendix A of the Scoping Report. The ES should also explain what assumptions have been made about the methodology and the assessment should be based on the maximum parameters or worst case scenario. The potential permanent loss of habitat associated with these works should be quantified. In addition, the ES should confirm the predicted number of vessel movements during all phases of the Proposed Development. The Inspectorate's comments at ID 2.1.12 of this Scoping Opinion about flexibility apply equally to this matter.	Detailed assumptions associated with the Cofferdam and In-River Construction Methodology are provided in **Chapter 5: Construction Programme and Management** (**PEIR Volume II**). Confirmation of the final assumptions and further assessment will be presented in the Marine Ecology Chapter of the ES. Information on anticipated numbers of vessel movements during all phases will be provided in the ES.
Chapter 12 - Marine Ecology	3.5.7	The Inspectorate	The Scoping Report states that the existing CCGT requires abstraction of cooling water and discharge into the River Dee, which is carried out in accordance with rates and limits in an Environmental Permit issued by NRW. It is stated that the Proposed Development may reuse the existing infrastructure or new outfall infrastructure may be required. Please refer to the Inspectorate's comments at ID 2.1.8 of this Scoping Opinion regarding establishing the baseline condition for the purpose of assessment. This should include information about the existing rates and limits and any monitoring data obtained as part of the Environmental Permit. The ES should define the worst-case parameters in terms of volumes and thermal impacts from the Proposed Development and include an assessment of any likely significant	Impacts from abstraction of cooling water and discharge on marine ecology receptors will be presented in the ES. This will include assessing information about the existing rates and limits and any monitoring data obtained as part of the Environmental Permit. Thermal discharge will be considered in the Physical Processes, Water Environment, and Flood Risk chapters of the ES. The results of this will

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			effects, particularly to marine and estuarine fish receptors. The Applicant should consider whether temperature modelling should be undertaken to inform this assessment.	be assessed within the WFD assessment and the impacts of this on marine ecology receptors will be assessed at the ES stage.
Chapter 12 - Marine Ecology	3.5.8	The Inspectorate	The Scoping Report states that Environment Agency (EA) information on fish counts (TraC data) would be used but then states in a footnote that there are no EA fish sampling stations in the River Dee and no information on fish counts is available. The assessment in the ES should be supported by robust baseline data. If insufficient desk-based data is available, alternative data source(s) should be used, which may include the need for migratory fish survey(s). Please refer to the Inspectorate's comments at ID 3.5.10 of this Scoping Opinion. The Applicant's attention is drawn to the comments of NRW (see Appendix 2) regarding the Marine Evidence Based Sensitivity Assessment (MarESA). This data source should be used to inform the ES as relevant.	The Applicant notes the reference to the Marine Evidence Based Sensitivity Assessment (MarESA) data source provided by NRW and will reference this in the ES as appropriate. The Applicant does not consider that it would be proportionate for the assessment of the Proposed Development to include migratory fish surveys . It is not considered that such surveys, which may be costly, timely and possibly lead to the killing of individual fish, will add value to the assessment. In accordance with CIEEM guidance, the impact assessment for migratory fish is being undertaken in accordance with the precautionary principle and thus, the worst-case scenario assessed, assuming all migratory fish (as qualifying features of the relevant protected site designations) are present during known migratory periods. NRW has agreed that fish surveys will not be required. Data from monitoring reports at Chester Weir have informed the baseline presented in Section 12.4 of **Chapter 12: Marine Ecology** (**PEIR Volume II**) .
Chapter 12 - Marine Ecology	3.5.9	The Inspectorate	The Inspectorate advises that Pen Llyn a'r Sarnau Special Area of Conservation (SAC) and North Anglesey Marine SAC, as well as harbour porpoise and bottlenose dolphin, should be scoped into the assessment of underwater noise and vibration during construction, given the mobile nature of the marine mammal qualifying features and/ or marine mammals, which could be present in the Dee Estuary. The Applicant's attention is drawn to the comments of NRW (see Appendix 2), which note some omissions and/ or errors in the description of potential fish receptors. These should be corrected in the ES. The Inspectorate encourages agreeing assessment parameters with the relevant statutory bodies. The ES should include a figure illustrating the final selected study area(s).	The request to consider these designated sites is acknowledged however they are located a considerable distance from the Indicative Site Boundary. The Pen Llyn a'r Sarnau Special Area of Conservation (SAC) and North Anglesey Marine SAC are referenced in **Chapter 12: Marine Ecology** (**PEIR Volume II**) as is considered appropriate. The study area for the marine ecology assessment is presented in **Figure 12-1: Marine Ecology Study Area** (**PEIR Volume III**). Both harbour porpoise and bottlenose dolphin are considered in the assessment presented in Section 12.6 of **Chapter 12: Marine Ecology** (**PEIR Volume II**). Separate responses are provided to NRW comments on the Marine Ecology Scope within later rows of this table. A meeting was held with NRW on 01 July 2024 to agree receptors for consideration in the ES. The outcome of this meeting will be reflected in the ES chapter itself.
Chapter 12 - Marine Ecology	3.5.10	The Inspectorate	The Scoping Report proposes intertidal habitat surveys for the area below mean high water springs (MHWS) within the water connection corridor and a buffer of 500m either side "where accessible". The water connection corridor is shown on Figure 1-3 of the Scoping Report. It is stated that this would encompass habitats and any potentially sensitive, protected and INNS marine ecology. The Inspectorate considers that that proposed survey scope is acceptable subject to the following comments: ▪ Final survey extents should be clearly described and illustrated on figures within the ES; ▪ Where survey extent is limited due to access issues, the ES should explain what efforts were made to obtain access and how any gaps in survey data are proposed to be addressed; ▪ It is unclear what specific species surveys are being proposed from information presented in the Scoping Report. The Inspectorate would expect the survey effort to include migratory fish and benthic invertebrates. Effort should be made to agree the scope, timing and extent of survey effort with relevant consultation bodies prior to survey work commencing. Evidence of any agreement or otherwise should be presented in the ES; and ▪ Limited reasoning is provided for not undertaking marine mammal surveys (for mammals other than harbour and grey seal). Noting that the study area extends to the Dee Estuary, where harbour porpoise and bottlenose dolphin could be present, and potentially further to specific receptors in the Irish Sea, the Inspectorate advises that survey(s) should be carried out where required to establish a robust baseline for marine mammals.	Marine intertidal walkover and drone surveys were completed in June 2024 and the findings will be included within the ES. Furthermore, following a Discretionary Advice Services (DAS) meeting with NRW in June, updated benthic surveys will be carried out within the Water Connection Corridor to inform the ES. This will involve taking infaunal grab samples. It was also agreed with NRW that migratory fish surveys and cetacean surveys are not required, and the use of existing baseline data is suitable. Therefore, no fish or cetacean surveys have been carried out. A meeting was held with NRW on 01 July 2024 to discuss the request for marine mammal surveys. It was agreed with NRW in this meeting that the use of existing baseline marine mammal data would be suitable for the purposes of the assessment, but that NRW would expect to see the use of vibro-piling, and no impact piling as part of the construction methodology.

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			Based on information in the Scoping Report, the Inspectorate agrees that harbour and grey seal surveys are not required as the presence of these marine mammals is well understood. The Inspectorate advises that survey work should be summarised in the ES and survey reports should be provided as technical appendices to the ES.	
Chapter 12 - Marine Ecology	3.5.11	The Inspectorate	Paragraph 10.6.3 of the Scoping Report states that permanent habitat loss because of re-use or replacement of the existing outfall would be minimised "as far as reasonably practicable" but does not explain how this would be achieved. Embedded mitigation measures relied upon to avoid or minimise significant adverse effects should be clearly explained, including through use of drawings as relevant, with cross-reference in the ES. Measures should be demonstrably secured through the DCO or other legal mechanism. The Applicant's attention is drawn to the comments of NRW (see Appendix 2) regarding INNS. The Inspectorate advises that a biosecurity risk assessment and INNS management plan for operational activities in the marine environment should be prepared and submitted with the DCO application.	The findings of the desk study of the local benthic environment are considered in Section 12.6 of **Chapter 12: Marine Ecology** (**PEIR Volume II**). Clarification on these matters will be provided in the ES. Separate responses are provided to NRW comments on the Marine Ecology Scope within later rows of this table.
Chapter 12 - Marine Ecology	3.5.12	The Inspectorate	For the avoidance of doubt, the Inspectorate understands that references to marine ecology in the description of construction and operation effects scoped into the assessment include marine mammals. Consideration should be given to whether construction works could result in any temporary habitat loss or disturbance for marine mammals, i.e. those that might be using habitat in the Dee Estuary; where significant effects are likely to occur, these should be assessed in the ES.	Section 12.6 of **Chapter 12: Marine Ecology** (**PEIR Volume II**) confirms that an assessment of construction and operational effects on marine mammals is scoped in. Please refer to Table 12.8 for further details of the pathways considered to be scoped in. A preliminary assessment of the effects on marine mammals is provided in Section 12.6 of **Chapter 12: Marine Ecology** (**PEIR Volume II**).
Chapter 12 - Marine Ecology	3.5.13	The Inspectorate	For the avoidance of doubt, assessment of these impact pathways should include consideration of any physical process effects associated with installation and use of a cofferdam (as identified in Chapter 14 of the Scoping Report). Please refer to the Inspectorate's comments at ID 3.9.7 of this Scoping Opinion.	A preliminary assessment of the physical process effects associated with installation and use of a cofferdam is provided in Section 12.6 of **Chapter 12: Marine Ecology** (**PEIR Volume II**).
Chapter 12 - Marine Ecology	3.5.14	The Inspectorate	The Applicant's attention is drawn to the comments of NRW (see Appendix 2). The assessment should consider potential for both temporary and longer-term habitat loss as a result of the full range of construction activities required. The expected effect duration should be described in the ES.	Consideration is given to both temporary and permanent habitat loss in Section 12.6 of **Chapter 12: Marine Ecology** (**PEIR Volume II**). This will be taken forward in further detail in the ES.
Chapter 12 - Marine Ecology	3.5.15	The Inspectorate	Please refer to the Inspectorate's comments at ID 3.4.13 of this Scoping Opinion regarding confidential annexes for sensitive or vulnerable ecological features.	Where necessary to comply with the relevant legislation and guidance, confidential appendices have been provided separately and will not be made available publicly.
Chapter 12 - Marine Ecology	N/A	Natural Resources Wales	There is limited detail about the proposed works for the Water Connection Corridor during construction and operation/maintenance, and particularly the description of the worst-case scenario, which makes it difficult to advise fully on the extent of impacts to marine ecological features at this scoping stage. We therefore advise that more detailed information is provided to enable a robust assessment of impacts in the final ES.	A description of construction within the Water Connection Corridor is provided in Section 5.4 of **Chapter 5: Construction Management and Programme** (**PEIR Volume II**). Clarification regarding in-river works will be included in the ES, and appropriate assessment of impacts undertaken.
Chapter 12 - Marine Ecology	N/A	Natural Resources Wales	We note that the abstraction and discharge of cooling water is still to be confirmed and will be subject to an Environmental Permit. However, for EIA scoping purposes we advise that worst-case scenarios of proposed volumes and thermal impacts are considered for the assessment of impacts to aquatic receptors.	A description of construction within the Water Connection Corridor is provided in Section 5.4 of **Chapter 5: Construction Management and Programme** (**PEIR Volume II**). Clarification regarding in-river works will be included in the ES, and appropriate assessment of impacts undertaken.

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Chapter 12 - Marine Ecology	N/A	Natural Resources Wales	Paragraph 10.4.8 / Table 10-1: please note that bullhead (Cottus gobio) is also a qualifying feature of the River Dee and Bala Lake SAC.	This will be considered in the aquatic ecological assessment presented in the Terrestrial and Aquatic Ecology chapter of the ES.
Chapter 12 - Marine Ecology	N/A	Natural Resources Wales	We note the requirement to implement intake screens to comply with the Eels Regulations 2009 has been recognised and that this will be considered in Chapter 9 (Terrestrial and Aquatic Ecology) of the ES. We advise that intake screens should also be designed to minimise impacts to migratory Annex II fish species, which are features of the Dee Estuary SAC and River Dee and Bala Lake SAC	This point is acknowledged. Further information on the design of the Eel screens is provided in Section 12.5 of **Chapter 12: Marine Ecology** (**PEIR Volume II**).
Chapter 12 - Marine Ecology	N/A	Natural Resources Wales	Paragraph 10.4.19: non-migratory brook lamprey is mentioned in relation to the Dee estuary. However, brook lamprey is a feature of the River Dee and Bala Lake SAC, but not of the estuary, and is generally only found in freshwater.	This has been corrected as necessary in **Chapter 12: Marine Ecology** (**PEIR Volume II**).
Chapter 12 - Marine Ecology	N/A	Natural Resources Wales	Paragraph 10.6.7: regarding fish we advise that given the narrowness of the channel, impact piling should be avoided in favour of vibro piling.	This position on the preference of vibro piling is acknowledged. As detailed in Section 12.5 of **Chapter 12: Marine Ecology** (**PEIR Volume II**), construction best practice measures re considered to include JNCC statutory nature conservation agency protocol for minimising the risk of injury to marine mammals from piling noise. This will be captured in the Framework CEMP to be submitted as part of the application for development consent.
Chapter 12 - Marine Ecology	N/A	Natural Resources Wales	We note and concur with the identified potential operational impacts to fish in Section 10.7.4, but we also advise that the potential impacts from simultaneous operation of both the existing and the new power station are fully considered in the ES.	As outlined in **Chapter 2: Assessment Methodology and Consultation** (**PEIR Volume II**), it is recognised that the existing Connah's Quay Power Station will not operate at its full installed capacity (4 CCGT units) concurrently with the Proposed Development. Therefore, in the event of phased construction, the Train 1 of the Proposed Development and up to 2 existing Connah's Quay Power Station units could require cooling water at the same time; or following single phase construction (or in the event of phased construction, following commercial operation of Train 2), only the Proposed Development would have demand for abstracted cooling water. Further information will be provided in the Marine Ecology Assessment presented in the ES.
Chapter 12 - Marine Ecology	N/A	Natural Resources Wales	Based on the limited amount of detailed information available about the proposed methodology for construction and operation we advise that the following impacts and sites should be scoped in regarding marine mammals: • Underwater sound assessment and vibration disturbance e.g., from piling • Accidental pollution • Collisions between any project vessels and marine mammals • Temporary habitat loss and/or disturbance • Impacts from release of sediment-bound contaminants • Indirect effects to marine mammals from changes in marine water quality • Temporary increases in suspended sediment concentrations and associated turbidity (please refer to our Physical Processes advice for further details)	This position on the scope of the assessment for marine mammals is acknowledged. Table 12-8 of **Chapter 12: Marine Ecology** (**PEIR Volume II**) provides a summary of the potential impacts considered in the PEIR for construction, operation and decommissioning. This table confirms the following elements are in scope: Construction: ▪ Physical disturbance to marine ecology from temporary increase in SSC and subsequent sediment deposition leading to increased turbidity, smothering effects and possible contaminant mobilisation; ▪ Effects to marine ecology from changes in marine water quality due to accidental spills within the ZoI; ▪ Underwater sound and vibration disturbance to marine ecology, particularly migratory fish, within the ZoI; and ▪ Collisions between any project vessels and marine mammals, particularly seals. Operation: ▪ Temporary increase in suspended sediment concentrations (SSC) sediment deposition from the use of compressed air blasting and (if required) a jet washing system leading to increased turbidity, smothering effects and possible contaminant mobilisation. Decommissioning:

Chapter	Comment ID (where applicable)	Consultee	Summary of Comment	Response
				Potential impacts and associated effects are assumed to be similar in nature to the construction phase.
Chapter 12 - Marine Ecology	N/A	Natural Resources Wales	A large grey seal 'haul-out' of 300-500 individuals, which forms part of the north Wales grey seal population, is present on the eastern side of Salisbury Middle, adjacent to Hilbre Island, located downstream of the Proposed Development in the mouth of the Dee estuary. Grey seals are a feature of the Pen Llŷn â'r Sarnau SAC and are functionally linked to the Dee estuary due to the mobile nature of this species and haul-out ranges along the north Wales coastline and within the Dee estuary, as well as their regular presence in the Dee estuary and river. Therefore, we advise that Pen Llŷn â'r Sarnau SAC should be scoped in for assessment due to the potential underwater noise disturbance and vibration during construction (e.g. piling). The timing of the proposed works will affect the possibility of disturbance to grey seal due to the seasonality of their haul-outs. We therefore advise that details of any underwater noise disturbance and timing of these works are considered and assessed in the ES. Harbour seals are also recorded hauled-out on the West Hoyle sandbank. However, exact haul-out numbers of this species are not known.	Pen Llŷn â'r Sarnau SAC has been considered and is identified within the baseline section (Section 12.4) of **Chapter 12: Marine Ecology** (**PEIR Volume II**). This site will be considered in the ES as necessary. The ES will also provide the details of potential underwater noise disturbance which will give consideration to seasonality.
Chapter 12 - Marine Ecology	N/A	Natural Resources Wales	Harbour porpoise and bottlenose dolphin could occur in the surrounding coastal waters and within the outer Dee Estuary, and therefore have potential for underwater noise disturbance impacts. We advise that consideration is given to these species and to North Anglesey Marine SAC (designated for harbour porpoise) which is the nearest marine mammal SAC in proximity to the Dee estuary.	North Anglesey Marine SAC has been considered in **Chapter 12: Marine Ecology** (**PEIR Volume II**)
Chapter 12 - Marine Ecology	N/A	Natural Resources Wales	With reference to paragraph 10.6.7, regarding marine mammals we welcome the proposed use of the standard JNCC mitigation measures for construction piling.	This position on the use of standard JNCC mitigation measures for construction piling is acknowledged .
Chapter 12 - Marine Ecology	N/A	Natural Resources Wales	We advise that Table 10-1 should include Pen Llŷn â'r Sarnau SAC, due to the functional linkage with grey seals using the Dee estuary.	Acknowledged. Pen Llŷn â'r Sarnau SAC will also be considered and is identified within the baseline section of **Chapter 12: Marine Ecology** (**PEIR Volume II**). This site will be considered in the ES as necessary.
Chapter 12 - Marine Ecology	N/A	Natural Resources Wales	We also advise that Table 10-1 should refer to the qualifying features of each SAC and not coastal features, as this is the terminology used in the conservation advice. Conservation objectives should be taken from the Regulation 33 advice as these are the agreed conservation objectives for cross-border sites.	A summary of the qualifying features of each SAC is provided in Table 1 of **Appendix 11-C: Preliminary Ecological Appraisal Report** (**PEIR Volume IV**).
Chapter 12 - Marine Ecology	N/A	Natural Resources Wales	Paragraph 10.6.3 notes that should the proposed development re-use, refurbish or replace the existing outfall located in the Water Connection Corridor, permanent habitat loss will be minimised as far as reasonably practicable. We advise that the worst-case scenario should be clarified and assessed and that the potential permanent loss of habitat should be calculated. We note that maintenance dredging is discussed but it is not clear where the dredge would be deposited, or the quantities and types of sediment to be dredged (please refer to para. 98 in our Physical Processes advice for further details).	No maintenance dredging currently takes place at the Existing Connah's Quay Power Station and no permit/licence is in place. The working assumption of the Applicant that maintenance dredging will not be required on the basis of the existing operation and any re-use, refurbishment or new cooling water intake infrastructure will be designed to avoid dredging. Clarification will be provided in the ES regarding habitat loss, as the design of the Proposed Development progresses. The intertidal area will be included within the NBB Assessment to be submitted as part of the application for development consent.
Chapter 12 - Marine Ecology	N/A	Natural Resources Wales	The potential use of a cofferdam is not discussed in Chapter 10 (Marine Ecology) but is included in Chapter 14 (Physical Processes). We advise that details of the proposed works should be defined and described in the ES in order to understand the potential impacts from the proposed development.	Clarification regarding in-river works will be included in the ES, and appropriate assessment of impacts undertaken.
Chapter 12 - Marine Ecology	N/A	Natural Resources Wales	Furthermore, we advise that potential linkages between different receptors and/or chapters should be clearly identified as impacts to one receptor may inform impacts to another i.e. where potential impacts to physical processes inform impacts to benthic ecology receptors and water quality.	Appropriate cross-references have been included in **Chapter 12: Marine Ecology** (**PEIR Volume II**) to note where assessments are to be provided in the ES.
Chapter 12 - Marine Ecology	N/A	Natural Resources Wales	Based on the limited amount of detailed information available about the proposed methodology for construction and operation we advise that the following construction and operation impacts should be scoped in for benthic ecology receptors.	This position on the scope of the assessment for benthic ecology is acknowledged. Table 12-8 of **Chapter 12: Marine Ecology** (**PEIR Volume II**) provides a summary of the potential impacts considered in the PEIR for

Chapter	Comment ID (where applicable)	Consultee	Summary of Comment	Response
			Construction impacts • Direct loss and physical disturbance to benthic habitats and species from works carried out below Mean High Water Spring tide limits (MHWS) within the Water Connection Corridor: this should be further defined to clearly differentiate between the impact pathways that relate to temporary habitat loss and/or disturbance from, for example, the movement of vehicles on the shore compared to impacts that could result in long-term habitat loss i.e. replacement of the Water Connection Corridor. We therefore advise that the following two impacts should be scoped in: ▪ Temporary benthic habitat loss and/or disturbance ▪ Long-term benthic habitat loss • Physical disturbance to benthic habitats and species from increased suspended sediment concentrations (i.e. increased turbidity and deposition): we advise that this should be defined as "temporary increases in suspended sediment concentrations and associated turbidity" as this would include potential impacts from smothering to benthic receptors • Indirect impacts to benthic ecology from changes in marine water quality (excluding turbidity) • Indirect impacts to benthic habitats from hydromorphological changes • Introduction and/or spread of Invasive Non-Native Species (INNS): this should include potential introduction of INNS from the movement of vessels required to deliver materials to site • Accidental pollution from vehicles, vessels, and equipment/machinery: this could be mitigated via production and adherence to standard post-consent plans e.g. a Construction Environmental Management Plan (CEMP) • Impacts from release of sediment-bound contaminants: disturbance to intertidal/subtidal habitats associated with construction activities could lead to remobilisation of sediment-bound contaminants that may affect benthic communities	construction, operation and decommissioning. This table confirms the following elements are in scope (and are in line with NRW's requests): Construction: ▪ Permanent and temporary direct loss and physical disturbance to benthic habitats and species from works (including construction phase dredging works and berthing of vessels, such as a jack-up barge (JUB), at low tide) below MHWS within the Water Connection Corridor; ▪ Physical disturbance to marine ecology from temporary increase in SSC and subsequent sediment deposition leading to increased turbidity, smothering effects and possible contaminant mobilisation; ▪ Effects to marine ecology from changes in marine water quality due to accidental spills within the ZoI; ▪ Indirect effects to marine ecology from hydromorphological changes (e.g. changes to water flow or sediment movement) within the ZoI; and ▪ Introduction and spread of INNS from any in-river works. A Framework CEMP will be prepared and submitted as part of the application for development consent and will consider measures to control accidental pollution as detailed in Section 12.5 of **Chapter 12: Marine Ecology** (**PEIR Volume II**)
Chapter 12 - Marine Ecology	N/A	Natural Resources Wales	We would not expect underwater sound and vibration disturbance to benthic ecology receptors to be scoped in unless specific benthic species that are sensitive to noise and/or vibration are identified within the project's Zone of Influence (ZoI).	This position on the scope of the assessment is acknowledged. This impact pathway is scoped out of further assessment as provided in Table 12-8 of **Chapter 12: Marine Ecology** (**PEIR Volume II**).
Chapter 12 - Marine Ecology	N/A	Natural Resources Wales	We advise that the following operational impacts should be scoped in: • Temporary habitat loss and/or disturbance e.g. maintenance dredging • Indirect impacts to benthic receptors from changes to existing thermal and chemical effects from treated water discharge • Indirect impacts to benthic receptors from hydromorphological changes: this should consider ongoing scour, potentially leading to habitat alteration - please also refer to our Physical Processes advice regarding changes to seabed/riverbed morphology (para. 109) and scour of seabed caused by water discharge (para. 110 - 112) • Impacts from release of sediment-bound contaminants • Indirect impacts to benthic ecology from changes in marine water quality (excluding turbidity) • Temporary increases in suspended sediment concentrations and associated turbidity (please refer to our Physical Processes advice below) • Introduction and/or spread of INNS e.g. from maintenance vessels if required, and also to account for any new infrastructure to function as a 'stepping-stone' for INNS • Accidental pollution • Increases in water temperature: this is discussed in Chapter 11 but not Chapter 10 regarding benthic ecology. Some benthic habitats and/or species are sensitive to changes in temperature. We therefore advise that this should be scoped in	Table 12-8 of **Chapter 12: Marine Ecology** (**PEIR Volume II**) provides a summary of the potential impacts considered in the PEIR. This table confirms the following elements are in scope for the Operation phase (and are in line with NRW's request): Operation: ▪ Direct loss and physical disturbance to benthic habitats and species from works carried out below MHWS within the Water Connection Corridor section of the Site; ▪ Indirect effects to marine ecology from any changes to existing thermal and chemical effects from treated water discharge (subject to control under existing permitted limits required for discharges); ▪ Physical disturbance and potential mortality to benthic and fish and shellfish ecology from entrainment and impingement within the cooling water abstraction and discharge infrastructure within the Water Connection Corridor; ▪ Temporary increase in suspended sediment concentrations (SSC) sediment deposition from the use of compressed air blasting and (if required) a jet washing system leading to increased turbidity, smothering effects and possible contaminant mobilisation; and ▪ Effects to intertidal habitats and species (including fish) from the deposition of airborne pollutants (e.g. from emissions from the power plant stacks during operation). Decommissioning: Potential impacts and associated effects are assumed to be similar in nature to the construction phase.

Chapter	Comment ID (where applicable)	Consultee	Summary of Comment	Response
Chapter 12 - Marine Ecology	N/A	Natural Resources Wales	Section 10.4.5 (Sources of Information): the Marine Evidence Based Sensitivity Assessment (MarESA) should be referred to for any future sensitivity assessments as this supersedes and replaces the Marine Life Information Network (MarLIN) approach.	Acknowledged, this will be considered during sensitivity assessment to be reported in the ES.
Chapter 12 - Marine Ecology	N/A	Natural Resources Wales	Section 10.4.23 (Marine Ecological Surveys and Data Collection): we agree that more recent surveys should be completed to characterise the intertidal habitats present and potentially affected by the development. This survey should include potential habitats affected within the defined ZoI. We would welcome engagement with the applicant when devising their characterisation survey. Please also refer to Natural Resources Wales / Benthic habitat assessments for marine developments for best practice guidance on how to carry out benthic habitat surveys and monitoring in relation to marine developments.	Intertidal surveys were completed in June 2024 and following a Discretionary Advice Service (DAS) meeting with NRW also in June 2024, updated benthic surveys will be carried out within the Water Connection Corridor to inform the ES. This will involve taking infaunal grab samples and will follow best practice guidance. The findings of the surveys will be reported in the ES.
Chapter 12 - Marine Ecology	N/A	Natural Resources Wales	Section 10.5 (Impact Assessment Methodology): with reference to the draft assessment methodology including definitions for longevity of an impact (i.e. short, medium, long term), extent and magnitude, we advise that the sensitivity of receptors should be defined and presented in the ES. Section 4.4.6 notes that specific criteria for each technical assessment will be developed but this has not been presented in Chapter 10.	The impact assessment presented in **Chapter 12: Marine Ecology** (**PEIR Volume II**) has been undertaken in accordance with CIEEM methodology as detailed in Section 12.3.
Chapter 12 - Marine Ecology	N/A	Natural Resources Wales	Section 10.6 (Embedded Mitigation): we advise that a full Biosecurity Risk Assessment and INNS Management Plan should be completed in relation to all marine operation activities associated with the proposal. The risk assessment and management plan should include consideration of all activities, vehicles and equipment used as well as how the risk will be minimised through appropriate mitigation and adherence to best practice guidance and management measures. The risk assessment should include a review of all available data in relation to the presence of marine INNS where applicable to the proposal, and the potential risks associated with each species identified.	INNS identified in the desk study of the local benthic environment have been considered in in **Chapter 12: Marine Ecology** (**PEIR Volume II**), with information provided in Section 12.4 (baseline) and Section 12.6 (assessment). Further information and assessment will be provided in the ES.
Chapter 13 - Water Environment	3.6.1	The Inspectorate	No matters have been proposed to be scoped out of the assessment	No response required.
Chapter 13 - Water Environment	3.6.2	The Inspectorate	As noted in ID 3.6.7, there is a high groundwater table, the Applicant should consider any implications of this on contamination for example. Clear cross-referencing should be provided within the ES. NRW in its response (see Appendix 2) notes that such cross referencing should be present in the major accidents and disasters aspect chapter.	This has been considered within the preliminary assessment presented in Section 13.6 of **Chapter 13: Water Environment (PEIR Volume II)** will be considered further in ES. Cross-references are provided to other chapters as necessary.
Chapter 13 - Water Environment and Flood Risk	3.6.3	The Inspectorate	It is noted that some of the guidance referenced throughout the aspect chapter in the Scoping Report is not listed in the identified guidance list. In the ES, all referenced guidance should be included within a reference list. NRW has identified additional guidance to be considered (see Appendix 2).	All referenced guidance has been included within the reference list for **Chapter 13: Water Environment (PEIR Volume II)**.
Chapter 13 - Water Environment and Flood Risk	3.6.4	The Inspectorate	The Applicant should consider whether temperature modelling is required as part of the EIA and Water Framework Directive (WFD) assessment, which should be used to inform the ES. The methodology for the water resources assessment should be justified in the ES, with effort made to agree it with the relevant consultation bodies.	If thermal discharge conditions are confirmed to be different from the existing arrangement, an initial near-field mixing assessment of the thermal discharge will be undertaken and reported in the WFD section of the ES.
Chapter 13 - Water Environment and Flood Risk	3.6.5	The Inspectorate	NRW comments (see Appendix 2) state that the hydraulic modelling referenced in Scoping Report paragraph 11.4.56, the tidal Dee model, does not include the Proposed Development site within the 1D-2D model extent. It is therefore likely that some additional modelling will be required to quantify the flood risk posed to the Proposed Development site. Further details are provided in NRW's response, which the Applicant should have regard to. The Inspectorate advises that the Applicant discuss and seek to agree with NRW and other relevant consultation bodies if the Proposed Development should be treated as new highly vulnerable development for the purposes of flood risk assessment and application of policy tests. This is not a matter on which the Inspectorate can advise.	It is anticipated that additional hydraulic modelling will be undertaken to support the Flood Consequence Assessment (FCA) as part of the ES. A meeting was held with NRW on 7/05/2024 to discuss the approach to hydraulic modelling, and NRW will sign off on the methodology prior to modelling being undertaken. Further details of consultation and engagement undertaken to date is provided in Table 13-2 of **Chapter 13: Water Environment (PEIR Volume II)**. The Preliminary FCA has, and the FCA will, treat the Proposed Development as highly vulnerable development in line with TAN 15 2004 as the current guidance as detailed in Section 1.3 of **Appendix 13-C: Flood Consequences Assessment** (**PEIR Volume IV**). A preliminary FCA has been undertaken. Please see **Appendix 13-C: Flood Consequences Assessment** (**PEIR Volume IV**).

Chapter	Comment ID (where applicable)	Consultee	Summary of Comment	Response
Chapter 13 - Water Environment and Flood Risk	3.6.6	The Inspectorate	The Inspectorate advises that a site investigation of groundwater conditions should be provided to establish the baseline conditions given NRW's view that the groundwater table is high. NRW state in its response (see Appendix 2) that baseline conditions should include a description of gradients and salinity. This information would also be important in assessing contamination pathways for the construction, operation and decommissioning phases notably because of the proximity to designated sites. The ES should consider these matters and provide justifications for any departure(s) from advice.	A Geo-environmental Desk Based Assessment (equivalent to a Stage 1, Tier 1 PRA) has been undertaken. This defines the need and scope of any future ground investigation and risk assessment which will be undertaken as the design of the Proposed Development is developed. Further consultation will be undertaken to agree the scope and timing of any future investigation. Further information can be found in **Appendix 14-A: Geo-Environmental Desk Based Assessment (PEIR Volume IV)**.
Chapter 13 - Water Environment and Flood Risk	3.6.7	The Inspectorate	The ES should confirm if the proposed water abstraction would involve water requirements in addition to the currently licenced quantities. It is likely that amendments to the existing abstraction licence would be required even if the quantities of water do not change. The ES should provide a progress update on these and any other licences being sought.	Currently it is anticipated that the Proposed Development will comply with the water abstraction licensed quantities for the Existing Connah's Quay Power Station. Any changes to water abstractions have been considered within **Chapter 13: Water Environment (PEIR Volume II)** and will be considered further within the ES. The ES will also include further commentary on the requirement for any new consents or licence requirements.
Chapter 13 - Water Environment and Flood Risk	3.6.8	The Inspectorate	The ES should include greater detail regarding the specific legislation and guidance used to define the methodology used. Due to the location of the Proposed Development, the Applicant should also consult with the Environment Agency (EA) in addition to NRW where appropriate.	All guidance used to inform the preliminary assessment has been included within the reference list for **Chapter 13: Water Environment (PEIR Volume II).** The Applicant will continue to consult relevant stakeholders as the assessment progresses.
Chapter 13 - Water Environment and Flood Risk	3.6.9	The Inspectorate	A concept/ outline surface water drainage strategy is proposed for the Main Site. The Scoping Report does not justify why it is limited to the Main Site and does not include the other components. The ES should include such a justification, or other sites and components should be included within the concept/ outline surface water drainage strategy.	At this stage, the only permanent above ground infrastructure is within the Main Site. The Proposed and Repurposed CO_2 Connection Corridors are anticipated to be underground, meaning the ground will be reinstated to its pre-construction state, and therefore it is not intended to be included in the drainage strategy. The access proposals are for abnormal loads during construction (traffic management required, nighttime deliveries). A CEMP will be in place for the construction stage which would cover any drainage requirements for this phase. Section 5.10 of **Chapter 5: Construction Programme and Management** (**PEIR Volume II**) provides details of the Framework Construction Environmental Management Plan (CEMP), which will be provided with the ES, and secured through a requirement of the DCO. Permanent above ground infrastructure will be required to adhere to a surface water drainage strategy during operation, with further justification will be provided in the ES.
Chapter 13 - Water Environment and Flood Risk	3.6.10	The Inspectorate	The Applicant's attention is drawn to NRW's response (see Appendix 2) noting that an interim classification waterbody status is due in 2024. All assessment should be based upon the most up to date information available.	Responses to comments provided by NRW are included alongside their respective comments within his Appendix.
Chapter 13 - Water Environment and Flood Risk	N/A	Flintshire County Council	Planning/site constraints and opportunities: • TAN15 Flood Risk Zones closer to the coast and areas without sea defences	This information has been considered in the preparation of the baseline provided in Section 13.4 of **Chapter 13: Water Environment (PEIR Volume II)**.
Chapter 13 - Water Environment and Flood Risk	N/A	Flintshire County Council	A Sustainable Urban Drainage System (SUDS) which will prevent reductions in water quality, attenuate surface runoff rates and form a part of landscape and ecological mitigation proposals will be required for consideration by the Council under the SAB (SUDS Approval Body).	A SuDS approach will be included in the surface water drainage strategy to be provided with the ES, and is referenced within Section 13.4 of **Chapter 13: Water Environment (PEIR Volume II)**.

Chapter	Comment ID (where applicable)	Consultee	Summary of Comment	Response
Chapter 13 - Water Environment and Flood Risk	N/A	Flintshire County Council	During construction there is the risk that contaminants are mobilised and result in pollution. A Flood Consequence Assessment (FCA) should be undertaken.	An FCA is being undertaken for the Proposed Development, as is presented in **Appendix 13-C: Flood Consequences Assessment** (**PEIR Volume IV**). This will be updated for the ES.
Chapter 13 - Water Environment and Flood Risk	N/A	Natural Resources Wales	Our Flood Risk Map confirms the development site to be located partially within Zone C1 (and Zone B) of the Development Advice Map (DAM) contained in Technical Advice Note (TAN) 15: Development and Flood Risk (2004). The Flood Map for Planning (FMfP) identifies the application site to be at risk of flooding and most of it is within Flood Zone 3 (Sea).	This point is acknowledged. Further information on the baseline is provided in Section 13.4 of **Chapter 13: Water Environment (PEIR Volume II)**.
Chapter 13 - Water Environment and Flood Risk	N/A	Natural Resources Wales	We note that a range of flood risk impacts have been scoped in for both the construction and operational phases, as outlined in Table 11-8. We are satisfied with the potential effects identified. We also note that the applicant has confirmed a Flood Consequences Assessment (FCA) will be prepared in support of the submission. We confirm that we would expect a detailed FCA to be prepared in support of this proposal. We consider that an FCA would be needed for any energy project in Zone C / Flood Zone 3, not only those greater than one hectare as is stated in paragraph 11.2.1 of the Scoping Report. The FCA should be prepared in compliance with Technical Advice Note (TAN) 15: Development and Flood Risk (2004). The updated TAN15 is yet to be published or adopted. However, we advise that the Flood Map for Planning should still be referred to, as confirmed in the letter from Welsh Government dated 15 December 2021, which confirms the FMfP represents better and more up-to-date information on areas at flood risk than the DAM.	The position on the scope of the water environment and flood risk assessment is acknowledged. A preliminary FCA is provided as **Appendix 13-C: Flood Consequences Assessment** (**PEIR Volume IV**). This will be updated in the ES.
Chapter 13 - Water Environment and Flood Risk	N/A	Natural Resources Wales	Based on the 'Indicative Site Map' contained within the Connah's Quay Low Carbon Power Project Newsletter (February 2024), a considerable portion of the proposed development would appear to be located on undeveloped arable land, with a smaller section within the footprint of the existing power station. We therefore consider that the proposal should be treated as new highly vulnerable development, as this undeveloped land is unlikely to benefit from an existing land use, and the proposal would also be an intensification of use. However, we advise that the Planning Inspectorate provides direction on this.	The preliminary FCA has and the FCA will treat the Proposed Development as highly vulnerable development in line with TAN 15 2004 as the current guidance. A preliminary FCA is provided as **Appendix 13-C: Flood Consequences Assessment** (**PEIR Volume IV**). This will be updated in the ES.
Chapter 13 - Water Environment and Flood Risk	N/A	Natural Resources Wales	The FCA should include a comprehensive assessment of flood risk from all sources, including the tidal Dee and fluvial sources, including Kelsterton Brook. The primary source of flood risk is likely to be tidal from the Dee. We note from paragraph 11.4.56 that "no hydraulic modelling is proposed as part of the EIA as there is sufficient existing hydraulic modelling for this area to be provided by NRW and the Environment Agency." However, the tidal Dee model does not include the site within the 1D-2D model extent, and it is therefore likely that some additional modelling will be required to quantify the flood risk posed to the site (whether this be an update to the existing model or a new study), and to assess the impact on flood risk elsewhere, especially as the Scoping Report indicates land raising of up to 1 metre will be required on parts of the site. We note that paragraph 11.5.6 refers to "existing NRW defences" which interface with the proposed development site. However, we understand that the feature along the site boundary is maintained privately, and we have no information on the standard of protection, maintenance regime or composition of this defence. We would therefore advise any modelling study to be based on an 'undefended' scenario which ignores the presence of this defence, to provide a precautionary assessment of flood risk.	It is anticipated that additional hydraulic modelling will be undertaken to support the FCA as part of the ES. A meeting was held with NRW on 7/05/2024 to discuss the approach to hydraulic modelling, and NRW will sign off on the methodology prior to modelling being undertaken. Further details of consultation undertaken to date is provided in Table 13-2 of **Chapter 13: Water Environment (PEIR Volume II)**. The preliminary FCA has and the FCA will treat the proposed development as highly vulnerable development in line with TAN 15 2004 as the current guidance. A preliminary FCA has been undertaken. Please see **Appendix 13-C: Flood Consequences Assessment** (**PEIR Volume IV**).
Chapter 13 - Water Environment and Flood Risk	N/A	Natural Resources Wales	Several sections of the Scoping Report (including Table 11-8) refer to the breach scenario being a 'residual risk'. We advise that a breach scenario (or in this case the undefended scenario due to the nature of the defence adjacent to the site) should be considered as the design event, and not a residual risk. The FCA should demonstrate that the entire site (as defined by the redline application boundary) can be designed to be flood-free in the 0.5% Annual Exceedance Probability (AEP) undefended event with an allowance for climate change for tidal flood risk, and the 1% AEP event with an allowance for climate change for fluvial flood risk.	This point is to be discussed with NRW further to inform the ES. Further information on consultation and engagement on this matter will be included in the ES.
Chapter 13 - Water Environment and Flood Risk	N/A	Natural Resources Wales	The 0.1% AEP event (with an allowance for climate change for tidal flood risk) should also be assessed, and the assessment of the proposal's impacts on flood risk elsewhere should be based on this event.	The FCA will consider the potential impacts of land raising to ensure no unacceptable increases in flooding. This is anticipated to be supported by hydraulic modelling.

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			The impacts of any land raising on tidal and fluvial flood risk should be quantified, and if any increases in flood risk elsewhere are identified these will need to be managed to an acceptable level.	A preliminary FCA is provided as **Appendix 13-C: Flood Consequences Assessment** (**PEIR Volume IV**). This will be updated in the ES.
Chapter 13 - Water Environment and Flood Risk	N/A	Natural Resources Wales	As it is for your Authority to determine whether the risks and consequences of flooding can be managed in accordance with TAN15, we recommend you consider consulting other professional advisors on matters such as emergency plans, procedures, and measures to address structural damage that may result from flooding. Please note, we do not normally comment on the adequacy of flood emergency response plans and procedures accompanying development proposals, as we do not carry out these roles during a flood. Our involvement during a flood emergency would be limited to delivering flood warnings to occupants/users.	A meeting was held with NRW on 7/05/2024 to discuss the approach to hydraulic modelling, and NRW will sign off on the methodology prior to modelling being undertaken . Further details of consultation undertaken to date is provided in Table 13-2 of **Chapter 13: Water Environment (PEIR Volume II)**.
Chapter 13 - Water Environment and Flood Risk	N/A	Natural Resources Wales	We advise that the scoping out of water bodies should be based on the project's ZoI (see para. 96 and 101 of our Physical Processes advice below,). Therefore, we do not agree that some water bodies should be screened out as they are 2km away (i.e. paragraph 11.4.1 and Table 11-1), as there may be impacts to fish, for example, due to a thermal plume.	This comment is acknowledged. Although as stated in Section 13.4 of **Chapter 13: Water Environment** (**PEIR Volume II**), the ZoI is stated as 1 km in the Scoping Report, downstream waterbodies were considered as there are no hydrological connections to water features between 1 km and 2 km distance or beyond.
Chapter 13 - Water Environment and Flood Risk	N/A	Natural Resources Wales	Table 11-2: note that the name of the transitional water body is "Dee (N. Wales)" not "River Dee". We advise that the target status of the Dee (N. Wales) water body is "Good" by 2027. Please also note that an interim classification is due in 2024 and the final assessment should be based on the most up to date information available.	This has been updated in **Chapter 13: Water Environment (PEIR Volume II)**.
Chapter 13 - Water Environment and Flood Risk	N/A	Natural Resources Wales	Table 11-3: we concur with the designated sites identified and agree that there are no Bathing Waters in proximity to the development.	This position on the baseline is acknowledged.
Chapter 13 - Water Environment and Flood Risk	N/A	Natural Resources Wales	Paragraph 11.4.59: we advise that the "Clearing the Waters for All" WFD guidance is followed to inform screening and scoping. The WFD compliance assessment should include all parts of the development, including those licensable under Marine Licensing and the Environmental Permitting Regulations (i.e. water abstraction and discharge).	The WFD assessment presented in the ESwill follow 'Clearing the Waters for All' WFD guidance.
Chapter 13 - Water Environment and Flood Risk	N/A	Natural Resources Wales	Paragraph 11.5.1: we advise that the Environment Agency (EA) are also consulted as the river water bodies lying to the north of the Dee estuary are within the EA's jurisdiction.	The Indicative Site Boundary has been reduced, with no potential for impacts to waterbodies north of the Dee estuary. The EA have been consulted and have stated that they hold no information for any water body within the study area.
Chapter 13 - Water Environment and Flood Risk	N/A	Natural Resources Wales	Paragraph 11.5.2: we agree that the assessment should consider construction, operation and decommissioning as well as abstraction and discharges. We also agree that foul water should be considered. Any risks from the mobilisation of contamination to the water environment (to be addressed in Chapter 12, Geology and Ground Conditions) should also be considered in the WFD compliance assessment.	Foul water and potential contamination will be considered within the WFD. Where relevant cross references are provided to other assessments within the PEIR.
Chapter 13 - Water Environment and Flood Risk	N/A	Natural Resources Wales	Paragraph 11.5.5: H1 assessment, dispersion modelling and sediment transport modelling are mentioned as potential assessment techniques. We advise that temperature modelling may also be required if a thermal plume is to be generated by the development.	Nearfield temperature and sediment transport modelling is taking place as part of the Physical Processes chapter to support the design of the Proposed Development and the ES. The results of this will be assessed within the ES chapter and final WFD assessment.
Chapter 13 - Water Environment and Flood Risk	N/A	Natural Resources Wales	We note from paragraph 11.5.13 that any modelling requirements will be agreed with NRW, and we would welcome further engagement regarding this.	A meeting was held with NRW on 7/05/2024 to discuss the approach to hydraulic modelling, and NRW will sign off on the methodology prior to modelling being undertaken Consultation is ongoing with NRW to define the approach for the FCA. A meeting was held with NRW on 7/05/2024 to discuss the approach to hydraulic modelling, and NRW will sign off on the methodology prior to modelling being undertaken. Further details of consultation undertaken to date is provided in Table 13-2 of **Chapter 13: Water Environment** (**PEIR Volume II**).

Chapter	Comment ID (where applicable)	Consultee	Summary of Comment	Response
Chapter 13 - Water Environment and Flood Risk	N/A	Natural Resources Wales	We are content with the proposed scoping of hydrological elements for the EIA. We advise that all works in and adjacent to watercourses associated with the proposal should aim to: • reduce impacts as far as practicable through expert geomorphological input in the siting and design of assets within the river and riparian zone (e.g. favouring directional drilling above open cut techniques, using clear-span structures rather than culverts) • mitigate any residual risks and impacts, work with the natural riverine processes present and actively seek to enhance the local environment through restoration of natural features and processes	This approach has been followed in **Chapter 13: Water Environment (PEIR Volume II)** will be followed within the Water Environment chapter of the ES.
Chapter 13 - Water Environment and Flood Risk	N/A	Natural Resources Wales	We note that the proposal will require water to be abstracted from the river Dee estuary. We advise that the ES should confirm if this would involve additional water to the currently licenced quantities. It is likely that amendments to the existing abstraction licence would be required even if the quantities of water do not change, such as a change of "purpose", licence holder or intake location. Any such amendments would need to be addressed by NRW's abstraction licencing process.	Currently it is anticipated that the Proposed Development will comply with the existing water abstraction licensed quantities for the Existing Connah's Quay Power Station. Any changes to water abstractions as a result of the Proposed Development will be considered within the ES. The ES will also include further commentary on the requirement for any new consents or licence requirements.
Chapter 13 - Water Environment and Flood Risk	N/A	Natural Resources Wales	We note that reference 203 of the Scoping Report (page 145), contains the wrong web page address. We therefore advise that the correct address is used in the ES.	This has been corrected within the reference list provided in **Chapter 13: Water Environment (PEIR Volume II)**.
Chapter 13 - Water Environment and Flood Risk	N/A	Natural Resources Wales	We are content with the scoping in of the various water quality aspects as per Chapter 11 and note that there are also some key uncertainties (paragraph 11.3.3) which may require water quality modelling to support the EIA. We also note that a CEMP would be produced, and this would incorporate control measures for potential water quality impacts.	The requirement for water quality modelling will be identified following clarification of the outfall structures. This will be detailed in the ES. Section 5.10 of **Chapter 5: Construction Programme and Management** (**PEIR Volume II**) provides details of the Framework CEMP, which will be provided with the ES, and secured through a requirement of the DCO.
Chapter 13 - Water Environment and Flood Risk	N/A	Natural Resources Wales	With regards to Section 11.6 (Embedded Mitigation) we advise that the applicant considers the Guidance for Pollution Prevention series.	This guidance series has been considered in **Chapter 13: Water Environment (PEIR Volume II)** and will be considered further within the ES.
Chapter 13 - Water Environment and Flood Risk	N/A	Natural Resources Wales	We note that groundwater flooding is scoped in. We advise that the groundwater flood risk at this site is heightened because the groundwater table is high. A robust baseline of groundwater conditions should therefore be determined. Such conditions would include groundwater depths as these will vary as a result of tidal influence, flow paths, gradients, and salinity. This information would also be important in assessing contamination pathways for the construction, operation, and decommissioning phases notably because of the proximity to designated sites. Changing climate impacts on tidal influence, tidal surges, sea-level rise, and salinity should also be considered as these have the potential to influence the transport of chemicals that may have leaked or been inadvertently released into the subsurface during the operational life of the facility. The permeability of near-surface materials including Tidal Flat Deposits may be moderate to high and depending on the nature of construction excavations, hydraulic control through dewatering has the potential to generate significant volumes of water. Dewatering could also generate a moderate cone of influence which may 'spread' existing contamination and salinity, although saline groundwater may be ubiquitously present given the site setting. Saline conditions should be confirmed through site investigation. A site investigation that defines the baseline groundwater conditions, including permeabilities, against knowledge of what will need to be excavated and its location would help to determine the nature of dewatering and potential associated contamination issues. This should be considered within the EIA. The ability to assess the potential of groundwater flow impediment is predicated on a sound understanding of baseline groundwater conditions and what would be built in the subsurface and its location. Groundwater levels may rise at the site because of sea-level rise during the operational life of	A Geo-environmental Desk Based Assessment (equivalent to a Stage 1, Tier 1 PRA) has been undertaken for the Proposed Development. This defines the need and scope of any future ground investigation and risk assessment which will be undertaken as the design is developed. Further consultation will be undertaken to agree the scope and timing of any future investigation. Further information is included in **Appendix 14-A: Geo-Environmental Desk Based Assessment** (**PEIR Volume IV**).

Chapter	Comment ID (where applicable)	Consultee	Summary of Comment	Response
			the project and this should be considered within the risk assessment. The presence of private water supplies, notably any that relies on near-surface groundwater, should be determined as changes to the flow regimes from the construction (dewatering) and operational site can potentially affect their performance; for example, increasing the salinity of the local groundwater because of dewatering or operational influence.	
Chapter 13 - Water Environment and Flood Risk	N/A	Natural Resources Wales	The site is located close to the river Dee, which is a main river. We advise that a Flood Risk Activity Permit (FRAP) (Environmental Permitting (England & Wales) Regulations 2016) may be required for any permanent or temporary works in, over, under or within 16 metres of a tidal main river, or within 16 metres of any flood defence structure on that river, or within a flood plain. See our website for further information: Natural Resources Wales / Flood risk activity permits. We note that some works will be in the marine environment and will be subject to a Marine Licence, including the possible new abstraction and discharge infrastructure and new eel screens. Any works covered by a Marine Licence will be excluded from requiring a FRAP. However, any works that do not require or are exempt from a Marine Licence may still need a FRAP, if they meet the definition of a flood risk activity.	t is acknowledged that a FRAP would be required. Further details on this matter are provided in Section 13.5 of **Chapter 13: Water Environment and Flood Risk** (**PEIR Volume II**). Depending on the extent of any upgrades that may be required to existing infrastructure, the Application for a DCO for the Proposed Development may be accompanied by a separate Marine Licence (ML). Consultations regarding the ML and any associated assessment requirements will be held with Natural Resources Wales (NRW) Marine Licencing Team as the EIA / DCO application progresses. Further information is provided in Section 4.6 of **Chapter 4: The Proposed Development** (**PEIR Volume II**).
Chapter 13 - Water Environment and Flood Risk	N/A	Network Rail	Soakaways / attenuation ponds / septic tanks etc, as a means of storm/surface water disposal must not be constructed near/within 5 metres of Network Rail's boundary or at any point which could adversely affect the stability of Network Rail's property / infrastructure. Storm / surface water must not be discharged onto Network Rail's property or into Network Rail's culverts or drains. Network Rail's drainage system(s) are not to be compromised by any work(s). Suitable drainage or other works must be provided and maintained by the Developer to prevent surface water flows or run-off onto Network Rail's property / infrastructure. Ground levels – if altered, to be such that water flows away from the railway. Drainage does not show up on Buried service checks.	This is to be considered within the Framework Surface Water Drainage Strategy which will be provided alongside the ES.
Chapter 13 - Water Environment and Flood Risk	N/A	Welsh Water (N.B. late response so not included in main Scoping Opinion report)	It appears the application does not propose to connect to the public sewerage system, and therefore Dwr Cymru Welsh Water has no objections in principle. However, should circumstances change and a connection to the public sewerage system/public sewage treatment works is preferred we must be reconsulted on this application.	Section 4.2 of **Chapter 4: The Proposed Development** (**PEIR Volume II**) provides further details on waste water connection works. Welsh Water will continue to be consulted and engaged with in relation to the Proposed Development.
Chapter 13 - Water Environment and Flood Risk	N/A	Welsh Water (N.B. late response so not included in main Scoping Opinion report)	It appears the application does not propose to connect to the public watermains system, and therefore Dwr Cymru Welsh Water has no objections in principle. However, should circumstances change and a connection to the public watermain system is preferred we must be re-consulted on this application.	This response is partially correct. Water supply to the Proposed Development will be from public mains, but any changes to the watermains system will be within the Applicant's land ownership. It is still to be confirmed whether this is downstream of the public watermains system.
Chapter 14 - Geology and Ground Conditions	3.7.1	The Inspectorate	The Proposed Development does not include any works beyond routine maintenance for the repurposed CO_2 connection corridor and existing natural gas connection corridor. As such, the Inspectorate is content to scope this matter out for the construction and postconstruction/ post decommissioning phase assessments.	This position on the scope of the construction and decommissioning phase assessments is acknowledged, is reflected in the PEIR and will be reflected in the ES.
Chapter 14 - Geology and Ground Conditions	3.7.2	The Inspectorate	The Applicant proposes to scope out impacts on human health from contamination within shallow unsaturated soil and groundwater during operation on the basis that the Proposed Development would operate in accordance with environmental permitting requirements. The Inspectorate is content with this approach; however, it would expect to see commentary on the best practice measures being followed during operation and progress or likelihood of securing permitting set out in the ES.	During operation, the Proposed Development will need an environmental permit under the Environmental Permitting (England and Wales) Regulations, 2016. For further information regarding aspects that have not been considered within the scope of the assessment, and further details of the environmental permit requirements, please see **Chapter 14: Geology and Ground Conditions** (**PEIR Volume II**).
Chapter 14 - Geology and Ground Conditions	3.7.3	The Inspectorate	The Scoping Report sets out that impacts on unsaturated soil and groundwater deriving from pollution events bypassing the drainage system during operation is to be scoped out on the basis that the Proposed Development would operate in accordance with environmental permitting requirements. The	During operation, the Proposed Development will need an environmental permit under the Environmental Permitting (England and Wales) Regulations, 2016.

Chapter	Comment ID (where applicable)	Consultee	Summary of Comment	Response
			groundwater table is very shallow at the site, as noted in paragraph 12.5.51 of the Scoping Report. The Inspectorate has considered this matter alongside responses from relevant consultation bodies, notably NRW, and deem that this matter should not be scoped out at this stage. NRW noted in its response that the drainage system could spread chemicals significantly depending on its design and is seeking further investigation and assessment. The Inspectorate encourages the Applicant to discuss this matter further with NRW.	This matter is to be discussed with NRW through further stakeholder engagement. For further information regarding the scope of the assessment, and further details of the environmental permit requirements, please see Chapter 14: Geology and Ground Conditions (PEIR Volume II). The scope of the operational assessment currently includes: • permanent degradation of soil function and withdrawal from agriculture; and • permanent mineral severance or sterilisation.
Chapter 14 - Geology and Ground Conditions	3.7.4	The Inspectorate	The Scoping Report sets out the requirement for further data gathering to inform the methodology and scope of the assessment. The ES should set out the scope of this investigation and any agreements reached with relevant consultation bodies. The Applicant should consider if monitoring is required to inform the baseline.	Consultation with regards to the scope and timing of future ground investigation and monitoring will be undertaken with NRW to inform the preparation of the ES. Further details of the ground investigations (geo-environmental and geotechnical) are provided in Section 14.5 of **Chapter 14: Geology and Ground Conditions** (**PEIR Volume II**).
Chapter 14 - Geology and Ground Conditions	3.7.5	The Inspectorate	The assessment criteria as set out in the Scoping Report are proposed to follow the Design Manual for Roads and Bridges (DMRB) guidance, which is primarily used for road schemes. The use of this assessment criteria has not been justified within the text to confirm its suitability for the Proposed Development. The ES should provide such justification. The Applicant should seek to agree the assessment criteria with relevant consultation bodies.	As detailed in Section 14.3 of **Chapter 14: Geology and Ground Conditions** (**PEIR Volume II**), although DMRB is applicable to road schemes, is considered to provide a suitable framework within which to conduct EIA for ground conditions on schemes which include linear elements (including the Proposed Development). Further details on the approach to assessing contaminated land are provided in **Appendix 14-B: Land Contamination Methodology** (**PEIR Volume IV**). Further engagement with relevant consultation bodies will be undertaken to agree the methodology, which has been successfully used for other similar schemes.
Chapter 14 - Geology and Ground Conditions	3.7.6	The Inspectorate	The Scoping Report makes reference to a Decommissioning Environmental Management Plan (DEMP). NRW (see Appendix 2) advises in its response that a Decommissioning Assessment Report is also prepared, with likely decommissioning tasks and estimated costings factored in for ground investigation and remediation scenarios. The Inspectorate directs the Applicant to comments in ID 2.1.12 which should be addressed in the ES in relation to decommissioning and therefore does not agree to scope out this matter on the information provided.	Section 14.6 of **Chapter 14: Geology and Ground Conditions** (**PEIR Volume II**) provides a preliminary assessment of the effects during the decommissioning phase of the Proposed Development. . As detailed in Section 4.5 of **Chapter 4: The Proposed Development** (**PEIR Volume II**), a Decommissioning Plan (including a Decommissioning Environmental Management Plan (DEMP)) will be produced at the time of decommissioning, pursuant to a Requirement of the draft DCO. The DEMP will include an outline programme of works, will consider all potential environmental risks and contain guidance on how risks can be removed, mitigated or managed, accounting for potential future changes to baseline conditions.
Chapter 14 - Geology and Ground Conditions	N/A	Coal Authority	We assume based on the comments within the Scoping Report that consideration will be given to the potential risks posed by coal mining features to the connection corridor as part of a ground conditions chapter within the ES. For clarity the 'main site' as identified does not fall within the defined Development High Risk Area and consideration of risk posed by coal mining features is not necessary.	Ground stability and geotechnical issues are typically assessed through an interpretive Ground Investigation Report (GIR) and as the design develops then a Geotechnical Design Report (GDR), or equivalent. Ground stability is a factor to be considered in the engineering design. Where there are potential stability issues relating to coal mining features (i.e. across the Repurposed CO_2 Connection Corridor), it is recommended in **Appendix 14-A: Geo-Environmental Desk Based Assessment** (**PEIR Volume IV**) that a Coal Mining Risk Assessment (CMRA) should be produced Further information is included in **Appendix 14-A: Geo-Environmental Desk Based Assessment** (**PEIR Volume IV**).

Chapter	Comment ID (where applicable)	Consultee	Summary of Comment	Response
Chapter 14 - Geology and Ground Conditions	N/A	Flintshire County Council	Planning/site constraints and opportunities: • Parts of the site are within the Coal Authority Referral Area and parts are within the Coal Authority Standing Advice area.	This information is acknowledged and the Coal Authority online mapping has been reviewed to inform the baseline presented in Section 14.4 of **Chapter 14: Geology and Ground Conditions** (**PEIR Volume II**).
Chapter 14 - Geology and Ground Conditions	N/A	Flintshire County Council	Planning/site constraints and opportunities: • 250m buffer zone around landfill sites in various locations	The Indicative Site Boundary is located within a landfill site and / or within the 250m buffer zone around landfill sites.
Chapter 14 - Geology and Ground Conditions	N/A	Flintshire County Council	The site lies within the flood zone of the River Dee and is at risk of flooding. Ground contamination and associated risks must be identified by way of a desk study, intrusive ground investigation and risk assessment.	A Geo-environmental Desk Based Assessment (equivalent to a Stage 1, Tier 1 Preliminary Risk Assessment (PRA)) has been undertaken. This defines the need and scope of any future ground investigation and risk assessment which will be undertaken as the design of the Proposed Development is developed. Further engagement will be undertaken to agree the scope and timing of any future investigations. Further information is included in **Appendix 14-A: Geo-Environmental Desk Based Assessment** (**PEIR Volume IV**).
Chapter 14 - Geology and Ground Conditions	N/A	Natural Resources Wales	We note that adverse impacts on unsaturated soil and groundwater deriving from pollution events bypassing the drainage system are proposed to be scoped out. However, given that groundwater is very shallow at the site we advise that the ES includes a qualitative assessment of one or more pollution events to the wider environment using the source-pathway-receptor principle. This would enable a meaningful assessment based on a robust baseline upon which to assess contamination linkages i.e., which direction the contamination is likely to be directed towards.	A Geo-environmental Desk Based Assessment (equivalent to a Stage 1, Tier 1 Preliminary Risk Assessment (PRA)) has been undertaken and presents and initial Conceptual Site Model (CSM) using the source-pathway-receptor principle. An updated CSM will be provided with the ES. During operation, the Proposed Development will need an environmental permit under the Environmental Permitting (England and Wales) Regulations, 2016. Further details on the environmental permit will be provided in the PEIR. NRW will be engaged on this matter.
Chapter 14 - Geology and Ground Conditions	N/A	Natural Resources Wales	The drainage system could significantly spread chemicals depending on its design. We advise that details of the chemical inventory at the site are considered to assess the types of contaminants that could occur at the operating facility and qualitative statements are provided within the ES on these risks.	During operation, the Proposed Development will need to operate in accordance with an environmental permit, governed under the Environmental Permitting (England and Wales) Regulations 2016. Further details on the environmental permit will be provided in the ES.
Chapter 14 - Geology and Ground Conditions	N/A	Natural Resources Wales	Given the high groundwater table and proximity to sensitive environmental receptors, we advise that operational contamination assessment aspects are included/cross-referenced within the Major Accidents and Disasters assessment; for which we note that industrial and hydrological hazards have been scoped in.	Where appropriate, cross references between the Geology and Ground Conditions and the Major Accidents and Disasters assessment will be made within the ES.
Chapter 14 - Geology and Ground Conditions	N/A	Natural Resources Wales	Paragraph 3.3.7 provides a commitment that a soil and groundwater investigation will be undertaken prior to commencing construction. We note that no further information is provided on the scope of this investigation, considering that the main site possesses a high groundwater table, is in close proximity to a highly sensitive environment (Dee estuary) and is at risk of groundwater flooding. We advise that ground baseline conditions at the site should be investigated and understood, with sufficient time factored in to any site investigation so that baseline characterisation through monitoring can be suitably determined.	A Geo-environmental Desk Based Assessment (equivalent to a Stage 1, Tier 1 PRA) has been undertaken. This defines the need and scope of any future ground investigation and risk assessment which will be undertaken as the design of the Proposed Development is developed. Further engagement will be undertaken with relevant stakeholders to agree the scope and timing of any future investigation. Further information is included in **Appendix 14-A: Geo-Environmental Desk Based Assessment** (**PEIR Volume IV**).
Chapter 14 - Geology and Ground Conditions	N/A	Natural Resources Wales	We advise that a Decommissioning Assessment Report is prepared, with likely decommissioning tasks and estimated costings factored in for ground investigation and remediation scenarios, e.g., no contamination found after the operational life, some spot contamination found across the site, and major contamination across the site, along with potential long-term, post-decommissioning impacts associated with the project.	As detailed in Section 4.5 of **Chapter 4: The Proposed Development** (**PEIR Volume II**), a Decommissioning Plan (including a Decommissioning Environmental Management Plan (DEMP)) will be produced at the time of decommissioning, pursuant to a Requirement of the draft DCO. The DEMP will include an outline programme of works, will consider all potential environmental risks and contain guidance on how risks can be removed, mitigated or managed, accounting for potential future changes to baseline conditions.

Chapter	Comment ID (where applicable)	Consultee	Summary of Comment	Response
				Section 14.6 of **Chapter 14: Geology and Ground Conditions** (**PEIR Volume II**) provides a preliminary assessment of the effects during the decommissioning phase of the Proposed Development
Chapter 14 - Geology and Ground Conditions	N/A	Flintshire County Council	Any information on landfills – up to 250 m from the site	This source, along with Groundsure landfill dataset have been used to identify historic and current landfills within the Site and study area. This information is presented in **Appendix 14-A: Geo-Environmental Desk Based Assessment (PEIR Volume IV)**, Table 14 6, **Appendix 14-C: Potential Areas of Contamination** (**PEIR Volume IV**) and **Figure 14-2: Potential areas of contamination** (**PEIR Volume III**).
Chapter 15 - Landscape and Visual Amenity	3.8.1	The Inspectorate	The Scoping Report proposes to scope out an assessment of nighttime lighting effects during the construction phase on the basis that high levels of lighting already exist given the industrial nature of the area, and any additional lighting associated with the Proposed Development will be directional and temporary. The Inspectorate is content that the level of additional lighting generated during construction is unlikely to result in a significant effect and therefore this matter can be scoped out of the assessment.	This position on the scope of the construction phase assessment is acknowledged.
Chapter 15 - Landscape and Visual Amenity	3.8.2	The Inspectorate	The Inspectorate directs the Applicant to comments in ID 2.1.12 which should be addressed in the ES in relation to decommissioning and therefore does not agree to scope out this matter on the information provided.	**Chapter 4: The Proposed Development** (**PEIR Volume II**) states that in the event of decommissioning, a Decommissioning Environmental Management (DEMP) will be produced and agreed with the Environment Agency, Natural Resources Wales as part of the Environmental Permitting process. The DEMP will consider in detail all potential environmental risks and contain guidance on how risks can be removed, mitigated or managed, accounting for potential future changes to baseline conditions. As a result, additional potential impacts and associated effects arising during the decommissioning phase have been considered in Section 15.6 of **Chapter 15: Landscape and Visual Amenity** (**PEIR Volume II**), and are anticipated to be similar to those identified at the during the construction phase.
Chapter 15 - Landscape and Visual Amenity	3.8.3	The Inspectorate	The Inspectorate notes that an indicative list of viewpoint locations has been provided in the Scoping Report. The Applicant has undertaken to agree this list with relevant local authorities through further consultation. The Inspectorate welcomes this approach and advises the Applicant to make effort to agree the locations with other relevant consultation bodies, for example the Canal and River Trust and NRW. The Applicant should ensure that topography and ground cover are considered when identifying receptors. The Applicant should consider whether the assessment should include receptors in terms of users of the waterways and public rights of way (PRoW) within the vicinity of the Proposed Development site.	Table 15-2 of **Chapter 15: Landscape and Visual Amenity** (**PEIR Volume II**) provides a summary of the consultation undertaken to date relating to the LVIA. There has been no response received from Wirral LPA to confirm if they are satisfied with indicative proposed viewpoint locations considered within in **Chapter 15: Landscape and Visual Amenity** (**PEIR Volume II**). Recreational users of the waterway will be considered within the visual impact assessment without the use of a viewpoint. Recreational users of the PRoW will be considered within the visual impact assessment, and the requirement for an additional viewpoint on the PRoW will be considered.
Chapter 15 - Landscape and Visual Amenity	3.8.4	The Inspectorate	The Applicant's attention is drawn to the scoping consultation response from NRW (see Appendix 2) in relation to potential effects on the Clwydian Range and Dee Valley National Landscape.	An additional viewpoint (viewpoint 'P') was taken on a site visit in March 2024 and has been considered in the PEIR. This has been assessed in Section 15.6 of **Chapter 15: Landscape and Visual Amenity** (**PEIR Volume II**).
Chapter 15 - Landscape and Visual Amenity	3.8.5	The Inspectorate	The Lighting Strategy should consider impacts in relation to lighting on users of the adjacent railway, waterways and PRoW.	An Indicative Lighting Strategy will be prepared and submitted as part of the Application. The LVIA chapter in the ES will consider lighting effects on the users of waterways and PRoW.
Chapter 15 - Landscape and Visual Amenity	N/A	Flintshire County Council	The Council acknowledges that the identified 16 Indicative Viewpoints for assessment, which have been subject to change, may be subject to further change during consultations with Local Planning Authorities prior to the Landscape and Visual Impact Assessment being undertaken (paragraph 13.4.20). The Council would be happy to provide input on this when necessary.	As detailed in Section 15.2 of **Chapter 15 Landscape and Visual Amenity** (**PEIR Volume II**), FCC have been consulted and it has been confirmed that they have agreed that the proposed viewpoint locations will provide a good representative sample for the assessment. FCC requested that the Flintshire Leisure Tour route is also taken into consideration for potential viewpoints.

Chapter	Comment ID (where applicable)	Consultee	Summary of Comment	Response
Chapter 15 - Landscape and Visual Amenity	N/A	Flintshire County Council	The Scoping Report provides no reference to the provision of a BS5837:2012 (Trees in relation to design, demolition and construction – Recommendations) survey. It would be standard practice to include a BS5837:2012 survey as an appendix to the Environmental Statement, which included a tree data table, accurate plotting of trees on site plans and an Arboricultural Implication Assessment. At this stage it appears the implications to trees and hedges are minor.	A Tree Survey and Arboricultural Impact Assessment (AIA) will be undertaken and the findings included and considered within the assessments presented in the ES.
Chapter 15 - Landscape and Visual Amenity	N/A	Network Rail	When considering the impact of lighting on the local environment, the lighting strategy should also take into consideration any glint or glare that may be caused to the neighbouring railway. Any proposed lighting should not interfere with train drivers vision or signals within the area.	The Indicative Lighting Strategy to be submitted as part of the application for development consent will consider these points. This will then inform the preparation of an external lighting scheme secured through a DCO requirement, which will be designed in accordance with relevant standards.
Chapter 15 - Landscape and Visual Amenity	N/A	National Grid Electricity Transmission	If a landscaping scheme is proposed as part of the proposal, we request that only slow and low growing species of trees and shrubs are planted beneath and adjacent to the existing overhead line to reduce the risk of growth to a height which compromises statutory safety clearances.	This will be considered as the landscaping scheme for the Proposed Development is prepared and will also be detailed in the Outline Landscape and Biodiversity Management and Enhancement Plan, to be submitted as part of the application for development consent.
Chapter 15 - Landscape and Visual Amenity	N/A	Natural Resources Wales	The National Landscape (AONB) boundary is 8km from the application site at its closest point. We note that the Landscape and Visual Impact Assessment (LVIA) study area will be 10km. A viewpoint from Moel Famau on the National Landscape (AONB) ridgeline at just over 10km is likely to be included in the LVIA (reference viewpoint P) although the 10km study area would exclude the wider National Landscape (AONB) ridgeline.	As detailed in Sections 15.2 and 15.4 of **Chapter 15: Landscape and Visual Amenity** (**PEIR Volume II**) the 10 km study area will include a representative view from Clwydian Range and Dee Valley National Landscape (CRDV).
			A Zone of Theoretical Visibility (ZTV) is shown for the tallest element at 105m (Figure 13-8) and next tallest element at 56m (Figure 13-7). Both indicate visibility from Moel Famau. Forestry north of Moel Famau has recently been felled, and in any case, there would be views from the summit over the tree line	This point is acknowledged. Viewpoint 15 is located at Moel Famau (grid reference 316166, 362655). Table 15-4 of **Chapter 15: Landscape and Visual Amenity** (**PEIR Volume II**) notes long distance, expansive panoramic view from Moel Famau towards Connah's Quay.
Chapter 15 - Landscape and Visual Amenity	N/A	Natural Resources Wales	We welcome the statement in paragraph 13.6.3 that a colour study of existing colours and materials within the surrounding landscape and existing power station will be undertaken to inform the design of the proposed development.	Section 15.3 of **Chapter 15: Landscape and Visual Amenity** (**PEIR Volume II**) identifies that the proposed design, in particular the designs of the absorber column(s) (stack) and the CCGT and HRSG stack(s), should include consideration of appearance to reduce visual impact, accepting the scale of the Proposed Development. This will include a colour study of the existing colour/ materials of the surrounding natural landscape palette and the existing power station building, including using lighter coloured materials on the taller structures to enable them to recede against the sky.
Chapter 15 - Landscape and Visual Amenity	N/A	Natural Resources Wales	The LVIA study area should be expanded to include the Moel Famau viewpoint, and this should be used as a 'representative' viewpoint of other high points on the ridge line of hill forts, including Moel Arthur at 456m and Moel y Parc at 398m which are all on the Offa's Dyke long distance footpath.	The study area has been re-defined to a suitable size and include this relevant viewpoint information. Further information is presented in **Chapter 15: Landscape and Visual Amenity** (**PEIR Volume II**).
Chapter 15 - Landscape and Visual Amenity	N/A	Natural Resources Wales	Potential impacts on National Landscape (AONB) Special Qualities should be assessed in the LVIA and informed by detailed supporting evidence and assessment.	The assessment presented in Section 15.6 of **Chapter 15: Landscape and Visual Amenity** (**PEIR Volume II**) considers the potential impacts on the special qualities of the CRDV National Landscape.
Chapter 15 - Landscape and Visual Amenity	N/A	Natural Resources Wales	The National Landscape (AONB) boundary should be shown on viewpoint and other relevant mapping within the LVIA.	Figures supporting **Chapter 15: Landscape and Visual Amenity** (**PEIR Volume II**) include the National Landscape boundary as relevant.
Chapter 15 - Landscape and Visual Amenity	N/A	Wirral Council	No response received yet.	A further request for agreement on viewpoints has been sent to Wirral Council, however a response is yet to be received.
Chapter 16 - Physical Processes	3.9.1	The Inspectorate	The Scoping Report sets out that the Proposed Development does not include any works beyond routine maintenance for the repurposed CO2 connection corridor and it has not been considered further within the assessment. However, it is not explicitly summarised as being scoped out within Table 14-3 of the Scoping Report. Noting this, the Inspectorate is content to scope this matter out for the construction. However, it is noted that the Scoping Report does not define the terms post-construction and post-	The CO_2 Connection Corridor is not located within the marine environment (it is above Mean High Water Springs (MHWS)) and the Natural Gas Connection Corridor has been removed from the Indicative Site Boundary for the PEIR. Therefore, these corridors have not been considered in the

Chapter	Comment ID (where applicable)	Consultee	Summary of Comment	Response
			decommissioning. Without this information, the Inspectorate does not at this stage agree to the scoping of for these phases. The Inspectorate advises that this matter should be assessed for operation and decommissioning phases, or justification provided to demonstrates that there will be no LSE.	Physical Processes assessment presented in **Chapter 16: Physical Processes** (**PEIR Volume II**) and will not be considered in the ES.
Chapter 16 - Physical Processes	3.9.2	The Inspectorate	The Inspectorate has considered the information included in the Scoping Report regarding disturbance to the seabed caused by the cofferdam and temporary structures and advice provided by NRW. NRW consider that this matter should not be scoped out at this stage, requiring further information. The Inspectorate concurs with this view. The Applicant's attention is directed to the response of NRW (see Appendix 2) which highlights information regarding disturbance to the bed morphology which the Applicant should have regard to.	It is accepted that the localised disturbance of the bed morphology caused by the cofferdam and temporary structures during construction and decommissioning should be scoped in. An assessment will be presented in the ES.
Chapter 16 - Physical Processes	3.9.3	The Inspectorate	The Inspectorate notes that there are uncertainties in the works proposed for the water connection corridor, referenced in paragraph 14.3.2 of the Scoping Report. The Inspectorate is not content to scope out this matter based on the information available. It is deemed that the information provided is not sufficient to make an informed assessment of potential impacts to seabed morphology and other receptors. The maximum volume of water proposed to be abstracted and discharged should be assessed within the ES, as well as the LSE.	This position on the scope of the assessment is acknowledged and will be assessed in the ES.
Chapter 16 - Physical Processes	3.9.4	The Inspectorate	The Inspectorate has considered the information included in the Scoping Report regarding scouring due to the presence of new outfall structures affecting local flows and seabed levels during operation and advice provided by NRW response. The Inspectorate considers that this matter should not be scoped out at this stage. Further information should be provided on potential impacts to sensitive receptors caused by scouring and/ or sediment redeposition. The Applicant's attention is directed to the response of NRW (see Appendix 2) which highlights information regarding disturbance to the bed morphology which the Applicant should have regard to.	It is agreed that scour of the estuary bed by the outfall in intake structures should be scoped in if the new structures and associated flow rates differ significantly from the existing arrangement. Details of the design of the cooling water infrastructure are currently subject to confirmation. This potential issue will therefore be assessed in the ES when the required information is available.
Chapter 16 - Physical Processes	3.9.5	The Inspectorate	The Inspectorate notes that the ZoI extends beyond the water connection corridor; however, limited information has been provided to explain how the study area was selected. The ES should include an explanation, noting that the ZoI should be based upon receptors and potential impact pathways to LSE and not a nominal area or distance. The Applicant is advised that the maximum spring tide excursion should be used in determining the ZoI.	The Physical Processes chapter in the ES will define the study area and ZoI using the maximum spring tide excursion distance, as requested. An existing numerical model of the Dee Estuary will be used in the ES to determine the excursion distance. This model will be refined in order to inform the studies that are being undertaken to inform the ES. Sections 16.3 and 16.6 of **Chapter 16: Physical Processes** (**PEIR Volume II**) detail how the ZoI will be defined in the Environmental Statement (ES).
Chapter 16 - Physical Processes	3.9.6	The Inspectorate	NRW provides advice (see Appendix 2) referring to information that it deems necessary to understand the baseline and assess LSE. The Applicant is directed to this response and encouraged to agree the methodology with NRW.	The PEIR methodology is in line with the NRW guidance: 243 Guidance on Best Practice for Marine and Coastal Physical Processes Baseline Survey and Monitoring Requirements to inform EIA of Major Development Projects. Further information on the assessment methodology can be found in Section 16.3 of **Chapter 16: Physical Processes** (**PEIR Volume II**). This methodology will also be used to undertake the assessment for the ES.
Chapter 16 - Physical Processes	3.9.7	The Inspectorate	The ES should set out maximum parameters for the proposed temporary cofferdam, including if/ how it could lead to increased levels of suspended sediment. Any LSE should be assessed.	Section 16.6 of **Chapter 16: Physical Processes** (**PEIR Volume II**) identifies the potential impacts of the temporary presence of the cofferdam on levels of suspended sediment and provides cross reference to further assessment to be presented in ES. The further assessment will include the use of a 3D particle-tracking model.
Chapter 16 - Physical Processes	3.9.8	The Inspectorate	The disposal of spoil following maintenance dredging should be considered within the ES and include details of the disposal location, amount, and type of material, as well as an assessment into the potential impacts to the receiving site and surrounding area.	Currently no maintenance dredging takes place under the baseline conditions at the site in respect of the Existing Connah's Quay Power Station, and this is expected to remain the case in respect of the Proposed Development. Assumptions on this are outlined in the PEIR. The requirement for maintenance dredging will be reviewed and assessed if the final design includes a permanent structure in the marine environment which has the potential to modify local flow conditions and consequently interfere with natural sediment transport processes.

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				Section 16.6: Operational Phase, Changes to river / estuary bed morphology of **Chapter 16: Physical Processes** (**PEIR Volume II**) considers the potential impact of air blast cleaning and jet washing which is currently used to remove sediment from the eel screens. There is currently no requirement for maintenance dredging in respect of the Existing Connah's Quay Power Station and this situation is not expected to change in the future with the Proposed Development.
Chapter 16 - Physical Processes	3.9.9	The Inspectorate	The Scoping Report is not clear in relation to the impact pathway referred to in this paragraph [14.7.5 of the Scoping Report]. This should be clarified within the ES. The ES should confirm which receptors will be affected by suspended sediment concentration (SSC) plumes and potential release of contamination from the seabed.	The type of contaminants present within the Water Connection Corridor are currently unknown, a sediment sampling study is planned to acquire this data to carry out a more detailed assessment in the ES. The dispersion of contaminated sediment during the Construction / Decommissioning phase is anticipated to lead to a deterioration in water quality. This will be assessed in the ES based on dilution factors derived from SSC levels at the source relative to the receptor location. Potential impacts to sensitive habitats and species has been considered in **Chapter 12: Marine Ecology** (**PEIR Volume II**) and further assessment will be provided in the ES.
Chapter 16 - Physical Processes	3.9.10	The Inspectorate	The Inspectorate has considered the information included in the Scoping Report regarding scour of the seabed and the response from NRW, which queries the assumption that minimal impact would occur with discharge taking place during high tide and the effects of discharging water. The Inspectorate advises that scouring of the seabed caused by water discharge should be scoped into the ES at this stage. The Applicant is encouraged to discuss this and agree the approach with relevant consultation bodies	This is considered in Section 16.6 of **Chapter 16: Physical Processes** (**PEIR Volume II**) with further information to be presented in the ES.
Chapter 16 - Physical Processes	N/A	Natural Resources Wales	Given the uncertainties in the works proposed for the Water Connection Corridor and the construction methodology, all potential impacts relating to physical processes should remain scoped in until more information is available to make an informed assessment of impacts to seabed morphology and other receptors.	This position on the scope of the assessment in the absence of a fixed design is acknowledged, and will be reflected in the ES.
Chapter 16 - Physical Processes	N/A	Natural Resources Wales	The project's ZoI should be defined for each physical processes receptor and a description provided to show how the ZoI has been determined.	The Physical Processes chapter in the ES will define the study area and ZOI using the maximum spring tide excursion distance, as requested. An existing numerical model of the Dee Estuary will be used in the ES to determine the excursion distance. This model will be refined in order to inform the studies that are being undertaken to inform the ES. Sections 16.3 and 16.6 of **Chapter 16: Physical Processes** (**PEIR Volume II**) detail how the ZOI will be defined in the Environmental Statement (ES).
Chapter 16 - Physical Processes	N/A	Natural Resources Wales	Baseline Understanding: a more comprehensive understanding of circulation within the Dee estuary should be included in the ES and should consider the influence that freshwater input into the river Dee and estuary will have on the estuarine stratification and vertical mixing processes as well as the sediment transport and deposition processes. For the physical processes chapter, we advise that the applicant follows the recommendations outlined in: GN 041: Natural Resources Wales / Marine physical processes and Environmental Impact Assessment (EIA). The guidance includes two evidence reports: • Evidence Report No: 243 Guidance on Best Practice for Marine and Coastal Physical Processes Baseline Survey and Monitoring Requirements to inform EIA of Major Development Projects. • Evidence Report No: 208 Advice to Inform Development of Guidance on Marine, Coastal and Estuarine Physical Processes Numerical Modelling Assessments.	Section 16.4 of **Chapter 16: Coastal Processes** (**PEIR Volume II**) provides an up to date understanding of the baseline tidal currents. Further information will be included in the ES as relevant.
Chapter 16 - Physical Processes	N/A	Natural Resources Wales	Maintenance Dredging: no consideration appears to have been given to the disposal of dredge spoil if maintenance dredging is conducted during project operation. At present the quantities and type of sediment to be dredged are unknown. If it is intended to deposit dredge spoil at a licenced disposal site, we advise that an assessment should be completed to determine whether the disposal site can receive	Currently no maintenance dredging takes place under the baseline conditions at the site which is expected to remain the case in the future. Assumptions on this are outlined in the PEIR.

Chapter	Comment ID (where applicable)	Consultee	Summary of Comment	Response
			the required amount of dredge spoil in the first instance. Potential impacts on receptors caused by both the dredging and disposal activities should be included in the ES. Please also consider NRW's position note regarding this: PS 012 Sustainable management of marine and coastal sediment (naturalresources.wales)	The requirement for maintenance dredging will be reviewed if the final design includes a permanent structure in the marine environment which has the potential to modify local flow conditions and consequently interfere with natural sediment transport processes. Section 16.6: Operational Phase, Changes to river / estuary bed morphology of **Chapter 16: Physical Processes** (**PEIR Volume II**) considers the potential impact of air blast cleaning and jet washing which is currently used to remove sediment from the eel screens. There is currently no requirement for maintenance dredging and this situation is not expected to change in the future.
Chapter 16 - Physical Processes	N/A	Natural Resources Wales	Toxic Contamination: we advise that the sheltered, low energy environment of the upper Dee estuary will function as a muddy sediment sink where contaminants can bind to the muddy sediment. Contaminants may be remobilised if the sediment is disturbed e.g. dredging, making them available as potential pollutants in the water column, and being carried away from the site with the currents. We are concerned that contaminants released into the water column will not be adequately assessed in the correct chapter as there is currently incorrect signposting to Chapter 12 (Geology and Ground Conditions) which only deals with land contamination and not in-river contamination. We therefore advise that toxic contamination in the water column from sediment-bound contaminants is considered wholly in Chapter 11 (Water Resources and Flood Risk) under water quality and not signposted to other chapters.	Sediment sampling in the Water Connection Corridor to determine concentration is being undertaken and the results will be used to inform the assessments in the ES, as detailed in Section 16.4 in **Chapter 16: Physical Processes** (**PEIR Volume II**).
Chapter 16 - Physical Processes	N/A	Natural Resources Wales	We advise that where supporting literature is used to describe the baseline environment, the evidence should include an in-text citation with author and reference details next to the figure or text that is being referred to.	Where supporting literature has been referenced, this has been included in a reference list at the end of **Chapter 16: Physical Processes** (**PEIR Volume II**). This will also be undertaken for the ES.
Chapter 16 - Physical Processes	N/A	Natural Resources Wales	Paragraph 14.4.12: the tidal excursion distance is an important parameter that needs to be fully understood for the Dee estuary, particularly when determining the fate of Suspended Sediment Concentration (SSC) plumes and potential contaminants derived from construction and operational works in the upper estuary. We advise that the maximum spring tide excursion should be used to determine the ZoI relating to the spatial extent of potential impacts in relation to physical processes (e.g. SSC plumes and transport of remobilised contaminants). We advise that the applicant follows the recommendations outlined in NRW Guidance Note (GN) 041 (Natural Resources Wales / Marine physical processes and Environmental Impact Assessment (EIA)), which provides best practice guidance on coastal processes modelling.	**Section 16.4 of Chapter 16: Physical Processes** (**PEIR Volume II**) identifies that further modelling will be undertaken to support the assessment presented in the ES.
Chapter 16 - Physical Processes	N/A	Natural Resources Wales	Paragraph 14.4.30: we advise that sediment samples and core samples are collected in the Water Connection Corridor to determine the presence of contaminants and the size and distribution of seabed sediments. These data are required to inform the assessment of impacts to other receptors caused by maintenance dredging and/or construction works remobilising sediment into suspension to be transported by the current regime and redeposited.	For **Chapter 16: Physical Processes** (**PEIR Volume II**), no sediment data is yet available to inform the preliminary assessment. However, a sediment sampling campaign will be undertaken to inform the ES assessment.
Chapter 16 - Physical Processes	N/A	Natural Resources Wales	Paragraph 14.5.2: we advise that it is not only modified flows which may mobilise sediment. Maintenance dredging activities and excavation works could also disturb sediment off the seabed with the potential for SSC plumes to develop as a result. We welcome the intention to model the dispersion of suspended sediment from works carried out below MHWS associated with the project.	Currently no maintenance dredging takes place under the baseline conditions at the site which is expected to remain the case in the future. Assumptions on this are outlined in the PEIR. The requirement for maintenance dredging will be reviewed if the final design includes a permanent structure in the marine environment which has the potential to modify local flow conditions and consequently interfere with natural sediment transport processes. Section 16.6: Operational Phase, Changes to river / estuary bed morphology of **Chapter 16: Physical Processes** (**PEIR Volume II**) considers the potential impact of air blast cleaning and jet washing which is currently used to remove sediment from the eel screens. There is currently no requirement for maintenance dredging and this situation is not expected to change in the future.

Chapter	Comment ID (where applicable)	Consultee	Summary of Comment	Response
				As part of the worst-case assessment for the PEIR, it is assumed that possible construction phase dredging of the riverbed will occur within an unimpeded area (rather than within the dry cofferdam area or at low tide). Construction phase dredging of the estuary bed will release sediment into the water column increasing the SSC and turbidity, as well as potentially releasing sediment-bonded contaminants. The ES will establish the potential ZOI associated with the impacts of dredging (once dredging details are known).
Chapter 16 - Physical Processes	N/A	Natural Resources Wales	Paragraph 14.5.3: the applicant is advised to note and consider NRW Guidance Note GN 041.	Reference to the guidance note is acknowledged and referred to in Chapter 16: Physical Processes (PEIR Volume II).
Chapter 16 - Physical Processes	N/A	Natural Resources Wales	Paragraph 14.7.3: clarification should be provided on how and where the cofferdam will be installed, how long it will be in place and how it will lead to increased levels of suspended sediment and contaminant dispersion.	Section 5.4 of **Chapter 5: Construction Programme and Management** (**PEIR Volume II**) provides a summary of the cofferdam construction methodology.
Chapter 16 - Physical Processes	N/A	Natural Resources Wales	Paragraph 14.7.4: we advise that consideration should be given to the resultant SSC plumes caused by the maintenance dredging and the potential for SSC plume dispersion and sediment redeposition onto habitats which could be sensitive to sediment smothering and chemical contamination. The SSC plumes will also change the water clarity and, if present, the contaminants will lead to water quality deterioration.	It is assumed that maintenance dredging will not be required during the operational phase of the Proposed Development, which is consistent with the current situation for the Existing Connah's Quay Power Station. Construction phase dredging may be required and so is assumed as a worst case. However, details on this are not yet known and will be available following design of the cooling water infrastructure which is ongoing. Therefore, potential effects on physical processes from construction phase dredging are considered at a high level in this **Chapter 16: Physical Processes** (**PEIR Volume II**). A full assessment will be undertaken in the ES once details are available. As part of the worst-case assessment for the PEIR, it is assumed that dredging of the riverbed will occur within an unimpeded area (rather than within the dry cofferdam area or at low tide). Dredging the estuary bed will release sediment into the water column increasing the SSC and turbidity, as well as potentially release sediment-bonded contaminants. The ES will establish the potential ZOI associated with the impacts of dredging (once dredging details are available).
Chapter 16 - Physical Processes	N/A	Natural Resources Wales	Clarification should be provided on the disposal location of the maintenance dredged material. The amount and type of material to be dredged should be confirmed and detail of the disposal site provided. We advise that if the maintenance dredge material is to be disposed of in a marine disposal site, an assessment should be completed to determine any potential impacts to the receiving site and surrounding area from disposal of the maintenance dredge material.	It is assumed that maintenance dredging will not be required during the operational phase of the Proposed Development, which is consistent with the current situation. Construction phase dredging may be required and so is assumed as a worst case. However, details on this are not yet known and will be available following design of the cooling water infrastructure which is ongoing. Therefore, potential effects on physical processes from construction phase dredging are considered at a high level in this **Chapter 16: Physical Processes** (**PEIR Volume II**). A full assessment will be undertaken in the ES once details are available. Sediment contamination sampling will take place, and dependent on results, this will determine the course of action for any disposal.
Chapter 16 - Physical Processes	N/A	Natural Resources Wales	Clarification should also be provided with regards to which impact pathway is referred to in paragraph 14.7.5, as it is unclear if the applicant is referring to sediment disturbance leading to SSC plumes. We advise that the potential release of contaminants should be treated separately. Clarification should be provided on which receptors will be affected by the SSC plumes and subsequent deposition and what receptors will be affected by the potential release of contaminants from the seabed sediments. We advise that a summary table is included in the ES to describe the activities affecting physical processes and the receptors potentially affected by each impact pathway.	This will be considered within in the ES.

Chapter	Comment ID (where applicable)	Consultee	Summary of Comment	Response
Chapter 16 - Physical Processes	N/A	Natural Resources Wales	Paragraph 14.7.6 (Changes to seabed/riverbed morphology): we note that it is unknown how long the cofferdam will be in place. However, scour pits could potentially develop due to alteration in flow i.e. flow acceleration effects against the cofferdam. Depressions in the seabed may also persist following excavation works during the construction of the intake and outfall structures. At this stage there are uncertainties in the works proposed for the Water Connection Corridor. We therefore advise that changes to seabed/riverbed morphology from scour or excavation during construction works should not be scoped out at this stage, until a more informed assessment can be completed.	This is considered in **Chapter 16: Physical Processes** (**PEIR Volume II**) (Section 16.6) with further information to be presented in the ES.
Chapter 16 - Physical Processes	N/A	Natural Resources Wales	Paragraphs 14.7.7 – 14.7.9 (scour of the seabed caused by water discharge): based on the information presented we note that cooling water discharge will not occur at high water but towards low water (HW +1 to HW +4 i.e. on the ebb tide). We therefore consider the assumption that the impact is expected to be minimal due to the discharge taking place during high tide to be incorrect. The discharge of water will increase flow velocity and potentially cause scouring of the seabed and sediment suspension and redeposition. We therefore advise that scouring of the seabed caused by discharge of cooling water is scoped in as a continual impact over the operational phase of the project.	This is considered in **Chapter 16: Physical Processes** (**PEIR Volume II**) (Section 16.6) with further information to be presented in the ES.
Chapter 16 - Physical Processes	N/A	Natural Resources Wales	We advise that the impact on the seabed/riverbed levels caused by cooling water discharge should remain scoped in until a scour assessment is completed which considers the volume and velocity of discharge and the seabed sediment type, bedload morphology along with the presence of sensitive receptors which could be affected by the scouring and increase in water velocity.	This is considered in **Chapter 16: Physical Processes** (**PEIR Volume II**) with further information to be presented in the ES.
Chapter 16 - Physical Processes	N/A	Natural Resources Wales	Paragraphs 14.7.10 – 14.7.11: we advise that changes to morphology caused by scour around the intake and outfall channels should not be scoped out until a scour assessment has been undertaken considering the potential impact to sensitive receptors caused by scouring and/or sediment redeposition.	This is considered in **Chapter 16: Physical Processes** (**PEIR Volume II**) with further information to be presented in the ES.
Chapter 17 - Terrestrial Heritage	3.10.1	The Inspectorate	The Scoping Report notes that any impacts on terrestrial cultural heritage will have occurred and been mitigated during the construction phase. The Inspectorate is content that significant effects on buried archaeology during operation and decommissioning are not likely and this matter can be scoped out of the assessment. However, information regarding decommissioning is limited and therefore the Inspectorate directs the Applicant to comments in ID 2.1.12 which should be addressed in the ES in relation to decommissioning.	An assessment of effects on terrestrial heritage assets during decommissioning is presented in Section 17.6 of **Chapter 17: Terrestrial Heritage** (**PEIR Volume II**).
Chapter 17 - Terrestrial Heritage	3.10.2	The Inspectorate	The Scoping Report proposes to scope out an assessment of the direct impacts on known and potential marine cultural heritage receptors on previously disturbed sediment during construction on the basis that no known maritime heritage has been identified within the Proposed Development site, and construction activities will occur on previously disturbed mobile intertidal sediments which have been disturbed by installation of the original outflow. The Inspectorate is content that significant effects on marine cultural heritage during construction, for the reasons noted above, are not likely and this matter can be scoped out.	This position on scoping out an assessment of the direct impacts on known and potential marine cultural heritage receptors on previously disturbed sediment during construction is acknowledged.
Chapter 17 - Terrestrial Heritage	3.10.3	The Inspectorate	The Scoping Report proposes to scope out an assessment of the indirect impacts on marine heritage receptors due to altered sediment or hydrological processes on the basis that changes to hydrodynamics and sedimentary processes during construction and operation are expected to be negligible. The Inspectorate is content that significant effects on marine cultural heritage during construction and operation are not likely and this matter can be scoped out.	This position on scoping out an assessment of the indirect impacts on known and potential marine cultural heritage receptors during construction and operation is acknowledged
Chapter 17 - Terrestrial Heritage	3.10.4	The Inspectorate	The Scoping Report notes that significant effects from operational activities and maintenance dredging are unlikely on the basis that these activities will take place in areas where the dredging impact has already occurred. The Inspectorate is content that significant effects on marine cultural heritage during operation are not likely and that this matter can be scoped out.	This position on scoping out effects from operational activities and maintenance dredging is acknowledged.
Chapter 17 - Terrestrial Heritage	3.10.5	The Inspectorate	The Inspectorate agrees that there is not expected to be any potential impacts to buried marine archaeology during the decommissioning and therefore this matter can be scoped out. The Inspectorate directs the Applicant to comments in ID 2.1.12 which should be addressed in the ES in relation to decommissioning.	An assessment of effects on terrestrial heritage assets during decommissioning is presented in Section 17.6 of **Chapter 17: Terrestrial Heritage** (**PEIR Volume II**).
Chapter 17 - Terrestrial Heritage	3.10.6	The Inspectorate	The Applicant should seek to agree a methodology with relevant consultation bodies including Cadw and Flintshire Council. Cadw have highlighted as part of their representation that the Historic	The assessment presented in Section 17.6 of **Chapter 17: Terrestrial Heritage** (**PEIR Volume II**) takes account of the most up to date methodology at the time of writing. Technical engagement is ongoing with

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			Environment (Wales) Act is to be enacted in the near future, updating a number of guidance and policy documents. The EIA methodology should be based upon the most up to date methodology.	relevant consultees including Cadw and Flintshire Council to agree the methodology for the heritage assessment.
Chapter 17 - Terrestrial Heritage	N/A	Cadw	The designated historic assets in Annex A are inside 3km of the application area. As such, we expect that the impact of the *proposed windfarm* [the Proposed Development] on all these designated historic assets will be assessed in accordance with the Welsh Government guidance given in the document "The Setting of Historic Assets in Wales". We would expect a stage 1 assessment to be carried out for all the listed designated historic assets, which will determine the need, if necessary, for stages 2 to 4 to be carried out for specific historic assets. The results of the stage 1 assessment should be included in the EIA, possibly as an appendix.	The assessment presented in Section 17.6 of **Chapter 17: Terrestrial Heritage** (**PEIR Volume II**) utilises a 3 km study area for designated heritage assets and this has been agreed with Cadw. An assessment for all designated heritage assets located within this study area is presented in **Appendix 17A: Terrestrial heritage Desk Based Assessment** (**PEIR Volume IV**).
Chapter 17 - Terrestrial Heritage	N/A	Cadw	It is noted that section 15.4.40 identifies that there may be a need for archaeological fieldwork to be carried out after the completion of the desk-based assessment. It is recommended that Cadw and the Dyfed Archaeological Trust are consulted once the desk-based assessment and walkover survey have been completed to agree if there is a need for further surveys.	Technical engagement has been ongoing with the CPAT (the archaeological advisors to Flintshire Council) to agree the scope of any archaeological fieldwork required. Cadw have confirmed that they would defer agreement of the scope of fieldwork to CPAT.
Chapter 17 - Terrestrial Heritage	N/A	Cadw (also Flintshire County Council for second paragraph)	The requirement for geophysical survey would be triggered by clusters of surface monuments suggesting high levels of nearby activity, for which associated sub-surface archaeology may be present, but cannot be properly quantified and located. It may also be triggered where prior surveys cannot accurately define the nature of surface or sub-surface features without retrieving more information. If geophysical anomalies are located but are not diagnostic enough to allow informed opinions on dating, function, level of preservation and importance then additional intervention by targeted evaluation trenching may also be required within the pre-determination assessment stage and in accordance with Planning Policy Wales and TAN24. A realistic time period should be set aside to complete the archaeological assessment, reporting and mitigation discussion before the application is formally submitted for examination and in accordance with guidance on pre-determination archaeological evaluation set out in Technical Advice Note 24 (May 2017), paragraph 4.7 and Planning Policy Wales (Feb 2021), paragraph 6.1.26. Failure to complete the appropriate surveys may result in delays at the examination stage if additional information is required. The applicant should therefore adjust their application submission dates if necessary to ensure these surveys are fully completed.	Technical engagement has been ongoing with the CPAT (the archaeological advisors to Flintshire Council) to agree the scope of any archaeological fieldwork required to inform the baseline. Cadw have confirmed that they would defer agreement of the scope of any the archaeological fieldwork to CPAT. It has been agreed with CPAT that a geophysical survey will be undertaken in the first instance, the results of which would inform the requirement for any further stages of archaeological fieldwork. All archaeological fieldwork to be undertaken to inform the baseline will be undertaken in advance of DCO submission. The assessment presented in Section 17.6 of **Chapter 17: Terrestrial Heritage** (**PEIR Volume II**) takes account of the most up to date methodology at the time of writing.
Chapter 17 - Terrestrial Heritage	N/A	Cadw	Finally, it should be noted that the Historic Environment (Wales) Act 2023 will have been enacted before the EIA is completed and that many associated documents, such as TAN 24, will be updated in accordance with the Act.	The assessment presented in Section 17.6 of **Chapter 17: Terrestrial Heritage** (**PEIR Volume II**) has taken account of the most up to date methodology at the time of writing.
Chapter 17 - Terrestrial Heritage	N/A	Flintshire County Council	Planning/site constraints and opportunities: • Clwyd Powys Archaeological Trust assets on and surrounding the site	This information has been considered in preparing the assessment presented in Section 17.6 of **Chapter 17: Terrestrial Heritage** (**PEIR Volume II**) has.
Chapter 17 - Terrestrial Heritage	N/A	Flintshire County Council	The CPAT Planning Services section are the primary advisors to the Local Planning Authority on matters relating to development impacts on any non-designated heritage assets. Information on designated assets would be obtained from Cadw via cadwplanning@gov.wales (scheduled monuments, registered parks and gardens, battlefields, world heritage sites) and from the Built Heritage Conservation Officer for Flintshire County Council (Chris Rees Jones) in terms of listed buildings, conservation areas. With regard to marine and intertidal archaeology and related ship or aircraft wrecks the applicant should consult [redacted] (Marine Investigator) [redacted] regarding this scope and future assessment at the Royal Commission on the Ancient and Historical Monuments of Wales (RCAHMW).	Technical engagement is ongoing with the CPAT (the archaeological advisors to Flintshire Council) with regard to potential impacts to non-designated terrestrial heritage assets. Technical engagement has been started with Cadw and the Conservation Officer for Flintshire County Council with regards to designated terrestrial heritage assets. Effects on marine heritage are assessed in Section 18.6 of **Chapter 18: Marine Heritage** (**PEIR Volume II**) and technical engagement has been started with RCAHMW in order to confim the scope and methodology for assessment of impacts to marine heritage assets.
Chapter 17 - Terrestrial Heritage	N/A	Flintshire County Council	We normally expect all of the following sources to have been consulted to inform the baseline data: • Designated asset data from Cadw (http://historicwales.gov.uk)	The assessment presented in Section 17.6 of **Chapter 17: Terrestrial Heritage** (**PEIR Volume II**) utilises these sources.

Chapter	Comment ID (where applicable)	Consultee	Summary of Comment	Response
			• Archaeological records held by the National Monuments record RCAHMW including information on historic place names https://rcahmw.gov.uk/discover/list-of-historic-place-names/ • Archaeological records held by Clwyd-Powys Archaeological Trust HER (via direct consultation with the HER team her@cpat.org.uk and not just relying on Archwilio data). • Relevant Conservation Area details from Flintshire County Council. • LANDMAP datasets from NRW for Cultural Landscape and Historic Landscape aspect areas and associated character areas with the significance of impact to be quantified. • Maps, plans and documents held in the Flintshire Archives https://www.newa.wales/ • Maps, plans and documentary sources held at National Library of Wales including the Tithe Maps of Wales https://places.library.wales/home • Aerial photos held by the Central Register for Aerial Photography Wales (CRAPW) http://aerialphotos.wales.gov.uk/ and the National Monuments Record RCAHMW • Records held on the Portable Antiquities Scheme database here https://finds.org.uk/ • Readily available and relevant primary and secondary published sources and unpublished archaeological reports. • ZTV / cumulative ZTV from roof/chimney top to determine those heritage assets within the study areas which will be affected visually for subsequent setting impact assessments. • Findings of other environmental topics (landscape, peat, water, soils, noise, & vibration).	
Chapter 17 - Terrestrial Heritage	N/A	Flintshire County Council	During the iterative design process, and depending on the feedback from the desk based assessment and walkover surveys, there may be a requirement to gather more information on the sub-surface archaeological potential of the development area, which will not normally be apparent from a desk based and walkover study alone. We note the comments in Paragraph 15.4.23 and Paragraph 15.4.24 about the depths of made ground across the Main Site which vary between 1.6 - 4 metres of dumped material from the 1960's and later events. Depending on the depth of the new foundations and service trenches in this area it would seem highly unlikely that any significant archaeology survives or will be impacted. The potential for further geophysics and trenching within the Main Site area should be clearly stated in the desk based assessment and walkover report.	Engagement is ongoing with the CPAT to agree the scope of any archaeological fieldwork required to inform the baseline. A summary of consultation to date is provided in Table 17-2 of **Chapter 17: Terrestrial Heritage** (**PEIR Volume II**).
Chapter 17 - Terrestrial Heritage	N/A	Flintshire County Council	With regard to reporting and archiving of any archaeological reports produced by the archaeological consultants/contractors for this assessment it should be noted that a high resolution digital pdf will be required by the CPAT Historic Environment Record to be sent via HEDDOS https://cpat.org.uk/heddos.html in accordance with the Welsh Archaeological Trusts HER submission guidelines here https://cpat.org.uk/curatorial-services/historic-environment-record/#page-content And the full digital archive will need to be forwarded to the National Monuments Record, RCAHMW, Aberystwyth and/or the Archaeology Data Service in accordance with their submission guidelines.	Once finalised, the DBA will be deposited with the HER in accordance with the requirements of CPAT and in line with their guidance. The full digital archive will be deposited with Archaeology Data Service and submitted to the National Monuments Record and RCAHMW where appropriate.
Chapter 17 - Terrestrial Heritage	N/A	Flintshire County Council	We will need to approve a Written Scheme of Investigation (WSI) document (sometimes called a project design) before any new assessment work commences and WSI's will be required for any additional geophysics and evaluation trenching also. All WSI's and resulting final reports must include a Data 3 Management Plan (updated for final report), Archive Selection Strategy, Archive Content List and Archive Deposition Location Statement	WSI's for each stage of assessment (including DBA and archaeological fieldwork) will be prepared and agreed with CPAT. All WSIs will include a Data Management Plan, Archive Selection Strategy, Archive Content List and Archive Deposition Location Statement.
Chapter 17 - Terrestrial Heritage	N/A	Flintshire County Council	We would welcome further direct correspondence and communication with the archaeological consultants/contractor who are engaged to complete the cultural heritage assessment as part of an iterative design process, and we would also wish to see copies of any cultural heritage assessment reports completed as the design process moves forward. We would expect to be consulted on the draft final ES cultural heritage chapter before it is submitted for examination.	Engagement with CPAT is ongoing to agree the methodology and scope of the terrestrial heritage assessment. The assessment will be shared with CPAT as the project develops and the draft final ES terrestrial heritage chapter will be shared with CPAT prior to DCO submission.
Chapter 18 – Marine Heritage	3.10.2	The Inspectorate	The Scoping Report proposes to scope out an assessment of the direct impacts on known and potential marine cultural heritage receptors on previously disturbed sediment during construction on the basis that no known maritime heritage has been identified within the Proposed Development site, and construction activities will occur on previously disturbed mobile intertidal sediments which have been disturbed by installation of the original outflow. The Inspectorate is content that significant effects on marine cultural heritage during construction, for the reasons noted above, are not likely and this matter can be scoped out.	This position on scoping out of impacts to previously disturbed sediment is acknowledged.

Chapter	Comment ID (where applicable)	Consultee	Summary of Comment	Response
Chapter 18 – Marine Heritage	3.10.4	The Inspectorate	The Scoping Report notes that significant effects from operational activities and maintenance dredging are unlikely on the basis that these activities will take place in areas where the dredging impact has already occurred. The Inspectorate is content that significant effects on marine cultural heritage during construction and operation are not likely and this matter can be scoped out.	This position on scoping out effects during operational activities and maintenance dredging on marine heritage is acknowledged.
Chapter 18 – Marine Heritage	3.10.3	The Inspectorate	The Scoping Report proposes to scope out an assessment of the indirect impacts on marine heritage receptors due to altered sediment or hydrological processes on the basis that changes to hydrodynamics and sedimentary processes during construction and operation are expected to be negligible. The Inspectorate is content that significant effects on marine cultural heritage during construction and operation are not likely and this matter can be scoped out.	This position on scoping outindirect impacts on marine heritage is acknowledged.
Chapter 18 – Marine Heritage	3.10.5	The Inspectorate	The Inspectorate agrees that there is not expected to be any potential impacts to buried marine archaeology during the decommissioning and therefore this matter can be scoped out. The Inspectorate directs the Applicant to comments in ID 2.1.12 which should be addressed in the ES in relation to decommissioning.	Impacts of decommissioning on Marine Heritage have been scoped out of the assessment presented in Section 18.6 of **Chapter 18: Marine Heritage** (**PEIR Volume II**).
Chapter 18 – Marine Heritage	3.10.6	The Inspectorate	PINS indicated that the Applicant should seek to agree a methodology with relevant consultation bodies including Cadw and Flintshire Council. Cadw have highlighted as part of their representation that the Historic Environment (Wales) Act is to be enacted in the near future, updating a number of guidance and policy documents. The EIA methodology should be based upon the most up to date methodology.	The assessment presented in Section 18.6 of **Chapter 18: Marine Heritage** (**PEIR Volume II**) has taken account of the most up to date legislation and policy including the Historic Environment (Wales) Act 2023, and the methodology follows current best practice and guidance. The ES will take into account any updates to the Historic Environment (Wales) Act (anticipated to be updated in the latter part of 2024). Technical engagement is ongoing with relevant consultees including Cadw and CPAT (the archaeological advisors to Flintshire County Council).
Chapter 18 – Marine Heritage	N/A	Cadw	Cadw noted that section 15.4.40 identifies that there may be a need for archaeological fieldwork to be carried out after the completion of the desk-based assessment. It is recommended that Cadw and the Dyfed Archaeological Trust are consulted once the desk-based assessment and walkover survey have been completed to agree if there is a need for further surveys.	Technical engagement is ongoing with CPAT to agree the scope of any archaeological fieldwork required. Cadw have confirmed that they would defer agreement of the scope of fieldwork to CPAT.
Chapter 18 – Marine Heritage	N/A	Cadw	It should be noted that the Historic Environment (Wales) Act 2003 will have been enacted before the EIA is completed and that many associated documents, will be updated in accordance with the Act.	The Act is referenced in Section 18.1 of **Chapter 18: Marine Heritage** (**PEIR Volume II**) . The associated documents have not yet been updated at the time of writing but will be consulted for the ES. The assessment has taken into account the most up to date methodology and guidance at the time of writing.
Chapter 18 – Marine Heritage	N/A	Flintshire County Council	Flintshire County Council indicated that for marine and intertidal archaeology and related ship or aircraft wrecks the applicant should consult [redacted] (Marine Investigator) [redacted] regarding this scope and future assessment at the Royal Commission on the Ancient and Historical Monuments of Wales.	Engagement has been undertaken with RCAHMW in order to confirm the scope and methodology for the assessment of impacts to marine heritage assets.
Chapter 18 – Marine Heritage	N/A	Flintshire County Council	Flintshire County Council indicated that they normally expect all of the following sources to have been consulted to inform the baseline data: • Designated asset data from Cadw (http://historicwales.gov.uk) • Archaeological records held by the National Monuments record RCAHMW • Archaeological records held by Clwyd-Powys Archaeological Trust HER (via direct consultation with the HER team her@cpat.org.uk and not just relying on Archwilio data). • Relevant Conservation Area details from Flintshire County Council. • Maps, plans and documents held in the Flintshire Archives https://www.newa.wales/ • Maps, plans and documentary sources held at National Library of Wales including the The Maps of Wales https://places.library.wales/home • Records held on the Portable Antiquities Scheme database here https://finds.org.uk/ • Readily available and relevant primary and secondary published sources and unpublished archaeological reports. • Findings of other environmental topics (landscape, peat, water, soils, noise, & vibration).	The assessment has utilised the relevant sources listed. A full list is presented in **Appendix 18-A: Marine Heritage Desk Based Assessment** (**PEIR Volume IV**). Cross reference to other environmental topics (landscape, peat, water, soils, noise, & vibration), where this is relevant for the assessment of impact to marine heritage, will be set out in the ES.

Chapter	Comment ID (where applicable)	Consultee	Summary of Comment	Response
Chapter 18 – Marine Heritage	N/A	Flintshire County Council	With regard to reporting and archiving of any archaeological reports produced by the archaeological consultants/contractors for this assessment it should be noted that a high resolution digital pdf will be required by the CPAT Historic Environment Record to be sent via HEDDOS https://cpat.org.uk/heddos.html in accordance with the Welsh Archaeological Trusts HER submission guidelines here https://cpat.org.uk/curatorial-services/historic-environment-record/#page-content And the full digital archive will need to be forwarded to the National Monuments Record, RCAHMW, Aberystwyth and/or the Archaeology Data Service in accordance with their submission guidelines.	The DBA will be deposited with the HER in accordance with the requirements of CPAT and in line with their guidance. The full digital archive will be deposited with Archaeology Data Service and submitted to the National Monuments Record and RCAHMW where appropriate.
Chapter 18 – Marine Heritage	N/A	Flintshire County Council	We will need to approve a Written Scheme of Investigation (WSI) document (sometimes called a project design) before any new assessment work commences and WSI's will be required for any additional geophysics and evaluation trenching also. All WSI's and resulting final reports must include a Data 3 Management Plan (updated for final report), Archive Selection Strategy, Archive Content List and Archive Deposition Location Statement	A WSI covering mitigation for marine heritage will be prepared and agreed with CPAT and RCAHMW. The WSI will includes a Data Management Plan, Archive Selection Strategy, Archive Content List and Archive Deposition Location Statement.
Chapter 18 – Marine Heritage	N/A	Flintshire County Council	We would welcome further direct correspondence and communication with the archaeological consultants/contractor who are engaged to complete the cultural heritage assessment as part of an iterative design process, and we would also wish to see copies of any cultural heritage assessment reports completed as the design process moves forward. We would expect to be consulted on the draft final ES cultural heritage chapter before it is submitted for examination.	Correspondence and communication will continue, and Flintshire County Council will be consulted on the draft final ES as requested.
Chapter 19 - Socio-economics, Recreation and Tourism	3.11.1	The Inspectorate	The Scoping Report proposes to scope out an assessment of permanent disruption to traffic on the local and strategic road networks during the operation phase. Noting the comment made in relation to the scope of the traffic and transport aspect assessment in ID 3.3.1, the Inspectorate is content that disruption to traffic during operation is unlikely to result in a significant effect; however, the Applicant should consider any potential LSE from cumulative projects on the strategic road network. The Applicant is encouraged to discuss this and seek agreement from relevant consultation bodies.	An assessment of cumulative effects with other developments will be presented in the ES.
Chapter 19 - Socio-economics, Recreation and Tourism	3.11.2	The Inspectorate	The Scoping Report identifies potential effects on visitor attractions and community facilities but does not specifically explain how these are proposed to be considered as part of the socio-economic assessment. The ES should set out a clear methodology and impacts on visitor attractions and community facilities should be assessed in the ES where significant effects are considered likely.	**Appendix 19-C: Detailed Impact Assessment Methodology** (**PEIR Volume IV**) has been prepared to provide a detailed methodology which considers the approach to assessing each receptor individually, explaining how any impact on visitor attractions and community facilities is assessed in terms of sensitivity and magnitude criteria. This approach has been followed in the preliminary assessment presented in Section 19. 6 of **Chapter 19: Socio-economic, Recreation and Tourism** (**PEIR Volume II**).
Chapter 19 - Socio-economics, Recreation and Tourism	3.11.3	The Inspectorate	The Scoping Report identifies potential temporary and permanent effects on PRoW during the construction and decommissioning phases. The Scoping Report does not explain how impacts on PRoW are to be considered as part of the socio-economic assessment methodology. Impacts on PRoW should be assessed in the ES where significant effects are likely and mitigation detailed.	**Appendix 19-C: Detailed Impact Assessment Methodology** (**PEIR Volume IV**) has been prepared to provide detailed methodology which considers each receptor individually, explaining how any impact on PRoW is assessed in terms of sensitivity and magnitude criteria. This will support the general methodology included in the main body of the chapter. This approach has been followed in the preliminary assessment presented in Section 19. 6 of **Chapter 19: Socio-economic, Recreation and Tourism** (**PEIR Volume II**).
Chapter 19 - Socio-economics, Recreation and Tourism	3.11.4	The Inspectorate	No reference is made to crime and safety in the Scoping Report. The ES should set out whether the characteristics of the Proposed Development are likely to have any significant effects on crime and safety and provide justification if it is proposed to scope this matter out. The ES should explain how any required security measures are secured.	As described in Section 19.3, within **Chapter 19: Socio-economic, Recreation and Tourism** (**PEIR Volume II**), professional judgement and experience of similar developments has resulted in the scoping out of impacts on crime and safety, as no significant effects are anticipated due to the nature of the Proposed Development and its location on existing operational site.
Chapter 19 - Socio-economics, Recreation and Tourism	N/A	Flint Town Council	Opportunities to strengthen links of the project in particular the carbon capture and storage aspects of the scheme and the links to STEM subjects with local secondary schools in the area (including Richard Gwyn and Flint High School in particular) as part of Unipers outreach programme.	As reported in Section 19.5 of **Chapter 19: Socio-economic, Recreation and Tourism** (**PEIR Volume II**), at this PEIR stage there is no formal commitment regarding skills and training opportunities during the operational phase of the Proposed Development. It is assumed that the Applicant will pursue an arrangement with TTE, or any other suitable training provider, for apprentices to work on the Proposed Development.

Chapter	Comment ID (where applicable)	Consultee	Summary of Comment	Response
				The current proposal for this is two apprenticeships per year. The Applicant is in the early stages of working with Coleg Cambria, Bangor University, and Wrexham University to align courses at nearby education facilities with skills required for the Proposed Development. Further discussions between the Applicant and the regional skills partnership are ongoing. It is assumed that suitable arrangements will be in place for construction of the Proposed Development to suit both local socio-economic needs and those of the Proposed Development
Chapter 20 - Climate Change	3.12.1	The Inspectorate	No matters have been proposed to be scoped out of the assessment.	No response required.
Chapter 20 - Climate Change	N/A	Natural Resources Wales	We are content with the proposed scoping for each of the three methodological aspects of climate change assessment and note that the relevant data sources, climate hazards and impacts are referred to that we would expect for this type of development. For climate, we note that no elements are scoped out and the categorisation and thresholds for significance are as standard. Therefore, we have no concerns to raise at this scoping stage.	This position on the scope of the assessment is acknowledged.
Chapter 21 - Human Health	3.13.1	The Inspectorate	No matters have been proposed to be scoped out of the assessment.	No response required.
Chapter 21 - Human Health	3.13.2	The Inspectorate	The Scoping Report does not consider the impacts of the Proposed Development on housing supply. The ES should contain an assessment of the housing needs of the workforce and any LSE on local housing supply should be described.	An assessment of effects on local accommodation facilities has been undertaken in Section 19.6 of **Chapter 19: Socio-Economics, Recreation and Tourism (PEIR Volume II)**. This consists of assessing the effect of the construction workforce on local accommodation capacity.
Chapter 21 - Human Health	3.13.3	The Inspectorate	The Inspectorate advises that, whilst an initial approach to the identification of sensitive receptors has been provided, the impacts on health and wellbeing and health inequalities of the Proposed Development may have particular impact on vulnerable or sensitive populations, including those that fall within the list of protected characteristics. These receptors, if present, should therefore be included in the scope of assessment	IEMA guidance for human health assessment recommends that the assessment takes account of the sensitivity of relevant populations and vulnerable sub-populations and their ability to respond to change. This chapter considers potentially vulnerable sub-populations in the assessment in line with this guidance. Further information is provided within Section 21.4 of **Chapter 21: Human Health** (**PEIR Volume II**) where the existing and future baselines are discussed.
Chapter 21 - Human Health	N/A	UKHSA	Having considered the consultation documents, we do not have any specific comments at this stage. However, UKHSA requests that the proposer confirms either that the project does not contain any EMF sources that have a potential health impact; or that a health impact assessment is carried out in the Environmental Statement (ES). In terms of the level of detail to be included in an ES, we recognise that the differing nature of projects is such that their impacts will vary. UKHSA's predecessor organisation Public Health England (PHE) produced an advice document Advice on the content of Environmental Statements accompanying an application under the NSIP Regime', setting out aspects to be addressed within the Environmental Statement1. This advice document and its recommendations are still valid and should be considered when preparing an ES. Please note that where impacts relating to health and/or further assessments are scoped out, promoters should fully explain and justify this within the submitted documentation. It should be noted that Public Health Wales (PHW) is the national public health agency in Wales who will take the lead in health and wellbeing considerations.	The Proposed Development contains an Electrical Connection, which could produce EMFs. The Human Health assessment presented in Section 21.6 of **Chapter 21: Human Health** (**PEIR Volume II**) assesses whether or not significant effects to human receptors will arise from EMFs produced in the operational phase under the 'radiation' determinant. Public Health England's '*Advice on the content of Environmental Statements accompanying an application under the NSIP Regime*' has been considered and is detailed in **Appendix 7-A: Legislative, Policy and Guidance Framework for Technical Topics** (**PEIR Volume IV**). Where health impacts are scoped out, an explanation is provided in Section 21.2 of **Chapter 21: Human Health** (**PEIR Volume II**).
Chapter 21 - Human Health	N/A	Public Health Wales	Our partners, the UK Health Security Agency (formerly Public Health England) have published guidance on information to be included in Nationally Significant Infrastructure Project (NSIP) "Advice on the content of Environmental Statements accompanying an application under the NSIP Regime'i. We would expect to see the advice and recommendations from this document reflected in any ES.	The assessment presented in **Chapter 21: Human Health** (**PEIR Volume II**) has reviewed "*Advice on the content of Environmental Statements accompanying an application under the NSIP Regime*" and provides an overview of this in **Appendix 7-A: Legislative, Policy and Guidance Framework for Technical Topics** (**PEIR Volume IV**).

Chapter	Comment ID (where applicable)	Consultee	Summary of Comment	Response
			We are encouraged that the relevant information has been included in the scoping document, such as the sections on Air Quality, Noise and Vibration and Health. We also welcome reference to the Wales Health Impact Assessment Support Unit Guidance and the Wellbeing of Future Generations Act in relation to formulating the human health impact assessment (HIA) for this project. Furthermore, we are encouraged by any projects that mitigate the impacts of climate change by reducing reliance on fossil fuels and transitioning to renewable energy source such as solar, wind, tidal etc., provided the emissions related to the construction and maintenance of the site are kept to a minimum and are offset by the longevity of the project. As stated, PHW works closely with health boards across Wales. Since this project is located within Betsi Cadwaladr University Health Board (BCUHB), we can work with the Director of Public Health (DPH) within BCUHB to make them aware of the project and around any health concerns that may arise from the project. There may be some aspects of the development relating to health of the population that can be fielded directly to the DPH, as the lead for local public health issues.	
Chapter 22 - Major Accidents and Disasters	3.14.1	The Inspectorate	The Scoping Report proposes to scope out an assessment of the following hazards for the construction phase: Other industrial hazards; Meteorological hazards; Hydrological hazards; Geophysical hazards; Other natural hazards; and, Societal hazards. These matters are proposed to be scoped out on the basis that the likelihood of a major accident or disaster is low given the relatively short duration of the construction phase and small chemical inventory. Based on the information in the Scoping Report, the Inspectorate is content that risks to or from the Proposed Development from these matters are not likely to result in significant effects. These matters can be scoped out of the assessment.	This position on the scope of the construction phase assessment is acknowledged.
Chapter 22 - Major Accidents and Disasters	3.14.2	The Inspectorate	The Scoping Report proposes to scope out an assessment of the following hazards for the commissioning phase: Other industrial hazards; Meteorological hazards; Hydrological hazards; Geophysical hazards; Other natural hazards; and, Societal hazards. These matters are proposed to be scoped out on the basis that the likelihood of a major accident or disaster is low given the relatively short duration of the commissioning phase. Based on the evidence presented in the Scoping Report, the Inspectorate is content that risks to or from the Proposed Development from these matters are not likely to result in significant effects. These matters can be scoped out of the assessment.	This position on the scope of the operational phase assessment is acknowledged.
Chapter 22 - Major Accidents and Disasters	1.14.3	The Inspectorate	The Inspectorate directs the Applicant to comments in ID 2.1.11, which should be addressed in the ES in relation to decommissioning and therefore does not agree to scope out this matter on the information provided.	An assessment of the decommissioning of the Proposed Development is provided in Section 22.6 of **Chapter 22: Major Accidents and Disasters** (**PEIR Volume II**).
Chapter 22 - Major Accidents and Disasters	N/A	HSE	With reference to the redlined Indicative Site Boundary shown on Plate 1-1 Indicative DCO Site Layout contained in document [Connah's Quay Low Carbon Power (Uniper), Scoping Report, Document Reference 60717119 – AECOM] areas of the proposed development fall within HSE public safety zones associated with Major Accident Hazard Pipeline(s) and Major Hazard Installation(s): Pipeline(s) • 21 Feeder Mickle Trafford / Deeside [HSE ref 7630, Transco ref: 1881] - Pipeline Operator: National Grid Gas PLC • NTS (Burton Point) to Connahs Quay PS Pipeline [HSE ref 11891] - Pipeline Operator: Uniper • Point of Ayr to Connahs Quay Pipeline [HSE ref 11888] - Pipeline Operator: ENI Liverpool Bay Operating Company Major Hazard Installation(s) • H4216 Tata Steel UK Ltd, Flintshire	As described in Section 22.3 of **Chapter 22: Major Accidents and Disasters** (**PEIR Volume II**), potential domino effects would be considered as part of the COMAH process (if relevant) for the Proposed Development which would ensure risks are mitigated to be As Low As Reasonably Practicable (ALARP).

Chapter	Comment ID (where applicable)	Consultee	Summary of Comment	Response
			There is currently insufficient information available for HSE to provide its' public safety Land Use Planning Advice. However, by way of general guidance HSE would not advise against the proposed development providing no population(s), either temporary or permanent, is introduced within any of HSE's public safety zones nor would HSE advise against Workplaces (DT1.1 - Workplaces)*, providing for less than 100 occupants in each building and less than 3 occupied storeys.	
Chapter 22 - Major Accidents and Disasters	N/A	HSE	The presence of hazardous substances on, over or under land at or above set threshold quantities (Controlled Quantities) may require Hazardous Substances Consent (HSC) under the Planning (Hazardous Substances) Act 1990 as amended. The substances, alone or when aggregated with others, for which HSC is required, and the associated Controlled Quantities, are set out in The Planning (Hazardous Substances) (Wales) Regulations 2015. Hazardous Substances Consent would be required if the site is intending to store or use any of the Named Hazardous Substances or Categories of Substances and Preparations at or above the controlled quantities set out in schedule 1 of these Regulations. Further information on HSC should be sought from the relevant Hazardous Substances Authority.	Section 22.5 of **Chapter 22: Major Accidents and Disaster** (**PEIR Volume II**) identified that the Proposed Development may require Hazardous Substances Consent. Section 22.6 provides a summary of the hazardous substances to be used on site within each of the relevant phases of the Proposed Development. Further information will be provided in the ES.
Chapter 23 - Materials and Waste	13.5.1	The Inspectorate	The Scoping Report does not identify any allocated/ safeguarded mineral or waste sites present within the site boundary, as such, the Inspectorate is content to scope this matter out.	This position is acknowledged.
Chapter 23 - Materials and Waste	13.5.2	The Inspectorate	The proposed CO2 connection corridor is located within an MSA. The Scoping Report states that impacts to MSAs are not proposed to be assessed in the ES as they would be considered separately as a planning consideration. It is stated that this is in accordance with IEMA Guidance. Based on the Proposed Development and noting that potential severance and/ or sterilisation of the resource would be assessed as part of the Geology and Ground Conditions ES chapter, the Inspectorate is content to scope this matter out.	Potential severance and/ or sterilisation of the resource is considered within Section 14.6 of **Chapter 14: Geology and Ground Conditions** (**PEIR Volume II**).
Chapter 23 - Materials and Waste	13.5.3	The Inspectorate	The Scoping Report sets out that products used for the Proposed Development would be developed in a manufacturing environment with its own waste management plans, facilities, and supply chain and as such, are outside of the geographical scope of the study area. On this basis the Inspectorate is content to scope this matter out.	This position is acknowledged.
Chapter 23 - Materials and Waste	13.5.4	The Inspectorate	The Applicant proposes to address other environmental impacts associated with the management of materials and waste to or from the Proposed Development in other relevant environmental aspect chapters of the ES. On this basis the Inspectorate is content to scope this matter out. Cross-references should however be made between aspect chapters where appropriate to ensure a comprehensive assessment.	Cross references are included in the **Chapter 23: Materials and Waste** (**PEIR Volume II**) to other PEIR documents as appropriate.
Chapter 23 - Materials and Waste	13.5.5	The Inspectorate	The Applicant does not deem forecasting the availability of materials and landfill capacity an accurate reflection and states that it could be unreliable, noting the time periods involved. The Inspectorate agrees with this approach and on this basis is content to scope this matter out. Consideration at appropriate intervals regarding the availability of materials and landfill capacity will however need to be considered over the lifetime of the Proposed Development, including decommissioning. It is expected that reference to this will be made in the DEMP, site waste management plan (SWMP), and materials management plan (MMP).	Reference has been made to decommissioning in the Outline DEMP and DEMP within Section 23.5 of **Chapter 23: Materials and Waste** (**PEIR Volume II**) to be prepared to accompany the submission. The Site Waste Management Plan and Material Management Plan will cover construction only.
Chapter 23 - Materials and Waste	N/A	Natural Resources Wales	We are content with the proposed scoping of materials and waste aspects.	This position is acknowledged.
Chapter 24 - Cumulative and Combined Effects	3.16.1	The Inspectorate	The Inspectorate directs the Applicant to comments in ID 2.1.11, which should be addressed in the ES in relation to decommissioning and therefore does not agree to scope out this matter on the information provided.	**Chapter 24: Cumulative and Combined Effects** (**PEIR Volume II**) identifies that the cumulative assessment to be presented with the ES will include consideration of decommissioning.
Chapter 24 - Cumulative and Combined Effects	3.16.2	The Inspectorate	The Scoping Report sets out that 15km is the maximum study area. The Inspectorate considers that this may need to be revised to ensure consideration of all study areas in other environmental aspect chapters as some of these study areas may exceed 15km.	The study area within **Chapter 24: Cumulative and Combined Effects** (**PEIR Volume II**) remains at 15km and will be reviewed at the ES stage. Section 24.3.17 within the chapter details the justification for this.

Chapter	Comment ID (where applicable)	Consultee	Summary of Comment	Response
Chapter 24 - Cumulative and Combined Effects	3.16.3	The Inspectorate	It is noted that the Port of Mostyn is missing from the list of cumulative projects identified in Scoping Report Table 21-1. It is noted that this may be as a result of a nominal screening distance having be applied. The Applicant should ensure that a maximum screening distance is used and justified as being applicable to all assessments undertaken as part of the EIA.	The Port of Mostyn Energy Park Extension Project is included in the cumulative short-list within **Chapter 24: Cumulative and Combined Effects** (**PEIR Volume II**) as scheme ID 16.
Chapter 24 - Cumulative and Combined Effects	3.16.4	The Inspectorate	It is noted that recent approved and proposed developments at the Shotton Paper Mill site (less than 1km from the Proposed Development application site) have not been included in Appendix D, Table 1. These developments should be included in the ES and consideration should be given as to whether they should be scoped into the cumulative effects assessment.	Proposed developments at the Shotton Paper Mill site are included in the short list within **Chapter 24: Cumulative and Combined Effects** (**PEIR Volume II**) as scheme IDs 3, 55 and 114. A full list of cumulative developments is presented in **Appendix 24-A: Long List of Cumulative Schemes** (**PEIR Volume IV**) of cumulative projects.
Chapter 24 - Cumulative and Combined Effects	N/A	Flintshire County Council	Planning/site constraints and opportunities: • BAE Outer Safeguarding Zone Consultation Zone, BAE Birdstrike 13km Consultation Zone, BAE buildings above 15 m in height Consultation Zone Airport Safeguarding Area.	This information has been considered during the preparation of the PEIR.
Chapter 24 - Cumulative and Combined Effects	N/A	Flintshire County Council	Planning/site constraints and opportunities: • Overhead power line extends east to west	This information has been considered during the preparation of the PEIR.
Chapter 24 - Cumulative and Combined Effects	N/A	Flintshire County Council	Planning/site constraints and opportunities: • Green Barrier south of the site	This information has been considered during the preparation of the PEIR.
Chapter 24 - Cumulative and Combined Effects	N/A	Flintshire County Council	Planning/site constraints and opportunities: • Hynet Carbon Dioxide Pipeline Safeguarded Area	The Proposed Development is proposed to connect to the Hynet project and Hynet has been considered as part of the cumulative assessment presented in **Chapter 24: Cumulative and Combined Effects** (**PEIR Volume II**).
Chapter 24 - Cumulative and Combined Effects	N/A	Natural Resources Wales	We note that the Port of Mostyn is missing from the list of cumulative projects identified in Table 21-1, this may be due to the relative constrained screening distance of 15km. However, for some receptors this may need to be revised, please see our advice for benthic habitats and physical processes above.	The Indicative Site Boundary has now increased to include Port of Mostyn as part of the AIL route (See **Figure 3-1: Indicative Site Boundary** (**PEIR Volume III**). Port of Mostyn is included in the cumulative long list as scheme ID 16 (The Mostyn Energy Park Extension Project).
Aspects to be Scoped Out	3.17.1	The Inspectorate	Shipping and Navigation The Inspectorate is content that through adhering to best practice methods and established procedures relating to usage of the River Dee, the Proposed Development is unlikely to result in significant effects relating to shipping and navigation and therefore the matters listed in paragraph 22.1.11 are considered appropriate to be scoped out. The Inspectorate would however wish to see agreement to this approach by relevant consultation bodies involved in the procedures managing use and safety of the River Dee in the ES.	Consultation and engagement with the Dee Conservancy will be undertaken and the outcomes of this will be reported in the ES.
Aspects to be Scoped Out	3.17,2	The Inspectorate	Commercial Fisheries The Inspectorate is content that as a result of the location of the Proposed Development and notably the cofferdam in relation to the fishing activities, significant effects are unlikely. The potential for cockle dredging is noted but due to the scale of activity, the Inspectorate agrees that significant effects are unlikely. The Inspectorate therefore considers that the matters listed in paragraph 22.2.9 can be scoped out of the ES.	This position is acknowledged.
Aspects to be Scoped Out	3.17.3	The Inspectorate	Transboundary Effects The Inspectorate is content to scope this matter out, please see comments in ID 2.2.5.	This position is acknowledged.
Aspects to be Scoped Out	2.2.5	The Inspectorate	Transboundary Effects The Inspectorate on behalf of the SoS has considered the Proposed Development and concludes that the Proposed Development is unlikely to have a significant effect either alone or cumulatively on the environment in a European Economic Area State. In reaching this conclusion the Inspectorate has identified and considered the Proposed Development's likely impacts including consideration of potential pathways and the extent, magnitude, probability, duration, frequency and reversibility of the impacts.	An updated Transboundary screening assessment has been included as **Appendix 2-A** (**PEIR Volume IV**).

Chapter	Comment ID (where applicable)	Consultee	Summary of Comment	Response
			The Inspectorate considers that the likelihood of transboundary effects resulting from the Proposed Development is so low that it does not warrant the issue of a detailed transboundary screening. However, this position will remain under review and will have regard to any new or materially different information coming to light which may alter that decision. Note: The SoS' duty under Regulation 32 of the 2017 EIA Regulations continues throughout the application process. The Inspectorate's screening of transboundary issues is based on the relevant considerations specified in the Annex to its Advice Note Twelve, available on our website at http://infrastructure.planninginspectorate.gov.uk/legislation-andadvice/advice-notes/	
Aspects to be Scoped Out	3.17.4	The Inspectorate	Aviation The Inspectorate notes information provided in the Scoping Report, standard practices in terms of notification that will be followed and responses from relevant consultation bodies and is content for this matter to be scoped out.	This position is acknowledged.
Aspects to be Scoped Out	3.17.5	The Inspectorate	Electronic interference and electromagnetic fields (EMF) Noting that matters relating to health from EMF are scoped into the assessment, the Inspectorate is content to scope electronic interference and EMF out of the assessment as a standalone aspect providing consideration as part of other aspects is documented where relevant.	This position on consideration of EMF within the Human Health Assessment rather than as a standalone report is acknowledged. The Proposed Development contains an Electrical Connection, which could produce EMFs. The Human Health assessment presented in Section 21.6 of **Chapter 21: Human Health** (**PEIR Volume II**) assesses whether or not significant effects to human receptors will arise from EMFs produced in the operational phase under the 'radiation' determinant.
Cumulative Long List	N/A	Natural Resources Wales	We also note that recent approved and proposed developments at the Shotton Paper Mill site (less than 1km from the DCO application site) have not been included in Appendix D, Table 1. We therefore advise that these are included in Table 1 and consideration is given as to whether they should be scoped in to the cumulative effects assessment.	Shotton Paper Mill will be considered in the list of cumulative projects as scheme ID 115. A full list of cumulative developments is presented in **Appendix 24-A: Long List** (PEIR Volume IV) of cumulative projects.