Planning Inspectorate Reference: EN010166

Connah's Quay Low Carbon Power

Land at and in the vicinity of the Connah's Quay Power Station Site, Connah's Quay, Kelsterton Road, Deeside, CH5 4BP within the administrative area of Flintshire County Council, North Wales

The Connah's Quay Low Carbon Power Order

Programme Document

The Planning Act 2008
Nationally Significant Infrastructure Projects: 2024 Pre-application Prospectus

Applicant: Uniper UK Limited

Date: April 2025

Prepared for:
Uniper UK Limited

Prepared by:
DWD, AECOM & Copper

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1. Introduction

1.1 Background

1.1.1 This Pre-application Programme Document has been prepared on behalf of Uniper UK Limited (the 'Applicant') pursuant to the Department for Levelling Up, Housing and Communities' (now Ministry of Housing, Communities and Local Government) 'Planning Act 2008: Pre-application stage for Nationally Significant Infrastructure Projects' guidance dated 30 April 2024 ('the Guidance')[1]. It relates to a proposed application ('the Application') for a Development Consent Order (a 'DCO'), that is expected to be submitted to the Secretary of State for Energy Security and Net Zero (the 'SoS'), under Section 37 of the 'Planning Act 2008' (the 'PA 2008') in 2025.

1.1.2 The Application will seek a DCO in respect of the 'Connah's Quay Low Carbon Power (CQLCP) Abated Generating Station ('the Proposed Development') on land at, and in the vicinity of, the existing Connah's Quay Power Station, Kelsterton Road, Connah's Quay, within the administrative area of Flintshire County Council ('FCC'), Flintshire, North Wales.

1.2 The Applicant and the Proposed Development

1.2.1 The Applicant is Uniper UK Limited, a UK-based company, wholly owned by Uniper SE (Uniper) through Uniper Holding GmbH. Uniper is a European energy company with global reach and activities in more than 40 countries. With approximately 7,500 employees, the company makes an important contribution to security of supply in Europe, particularly in its core markets of Germany, the UK, Sweden and the Netherlands. Uniper's operations include power generation in Europe, global energy trading, and a broad gas portfolio. In the UK, the Applicant owns and operates a flexible generation portfolio of power stations, a fast-cycle gas storage facility and two high pressure gas pipelines, from Theddlethorpe to Killingholme and from Blyborough to Cottam.

1.2.2 The Proposed Development comprises the demolition of an existing gas treatment plant (GTP) and above-ground installation (AGI), store buildings, and contractors' facilities associated with the existing Connah's Quay Power Station and the construction, operation (including maintenance) and decommissioning of a proposed low carbon Combined Cycle Gas Turbine (CCGT) Generating Plant fitted with Carbon Capture Plant (CCP) (hereafter referred to as the 'Connah's Quay Low Carbon Power (CQLCP) Abated Generating Station') and supporting infrastructure (including the Proposed CO_2 AGI). The Proposed Development would achieve a net electrical output capacity of more than 350 megawatts (MW; referred to as MWe for electrical output) and up to a likely maximum of 1,380 MWe (with CCP operational) onto the national electricity transmission network. The Proposed Development would be fuelled by natural gas. It is designed to operate with a post-combustion CCP installed and would generally be operated as a dispatchable low carbon generating station. A process schematic for the Proposed Development is shown in **Plate 4-1**. The location of the Proposed

[1] https://www.gov.uk/guidance/planning-act-2008-pre-application-stage-for-nationally-significant-infrastructure-projects [accessed on 10 April 2025]

Development makes use of the existing available infrastructure links including electrical grid and gas (specifically the National Grid Electricity Transmission plc (NGET) and National Gas Transmission plc (NGT) networks) and has been sited to facilitate its connection to the HyNet CO_2 Pipeline Project, which was granted development consent in March 2024[2].

1.2.3 The Proposed Development is defined as a Nationally Significant Infrastructure Project (NSIP) under Section 14(1)(a) of the PA 2008[3], comprising *'the construction or extension of a generating station'* which falls under Section 15(1) and 15(3A) of the same Act as being in Wales, having a capacity of more than 350 megawatts (MW; referred to as MWe for electrical output) and not generating electricity from wind.

1.2.4 Section 115(1)(b), 115(2) and 115(4A) of the PA 2008, also includes provision for 'Associated Development' which either supports the access, construction or operation of the Proposed Development or helps to mitigate its impacts. The land for access works includes Connah's Quay North Jetty north-east of the existing power station. It also includes the Port of Mostyn to the north of the Power Station along the River Dee. Accommodation works on land and the local highways network for the transportation of materials and equipment by Abnormal Indivisible Loads (AILs) will be required; further assessment will determine if these works are to be both temporary and permanent.

1.2.5 The Order limits for the Proposed Development include all the land required for both permanent and temporary works as part of the construction and operation of the Proposed Development, including mitigation areas, construction land-take, and works to accommodate abnormal indivisible loads, and the extent of existing assets for which the right(s) to use, repurpose, and/or access are to be sought.

1.2.6 To achieve the UK's ambition of Net Zero by 2050, and as we become more reliant on electricity, with the electrification of sectors such as transport, heating and industry, more generation capacity will be needed. According to the UK's independent advisor on climate change, the Climate Change Committee (CCC), demand for electricity is forecast to increase by 50% by 2035[4]. To meet this increasing demand and achieve the UK's decarbonisation goals, the CCC has also advised that a range of different technologies with both renewables and decarbonised generation, such as gas with Carbon Capture and Storage (CCS), will be needed to maintain a secure and stable supply of electricity[5].

1.2.7 The Proposed Development would be able to flexibly and reliably generate low carbon power to meet the growing need for electricity, whenever it is required. Power stations such as this will play a crucial role in the future energy system, as they can help ensure that energy is available at times when it is needed most, and when power from renewable sources cannot meet demand. Due to the increasing demand for electricity and the need for low carbon electricity infrastructure to meet Net Zero targets, Overarching National

[2] The HyNet CO_2 Pipeline Project will consist of a new pipeline running from the Chester/ Ellesmere Port area to Flint and a repurposed existing pipeline (currently used for natural gas supply) running from Flint to Point of Ayr.
[3] https://www.legislation.gov.uk/ukpga/2008/29/contents [accessed on 10 April 2025]
[4] In its Balanced Pathway for the Sixth Carbon Budget (Dec 2020), the UK's Climate Change Committee (CCC) forecast a 50% increase in electricity demand by 2035 and a doubling in electricity demand by 2050 (Sixth Carbon Budget - Climate Change Committee (theccc.org.uk))
[5] CCC Sixth Carbon Budget electricity generation sector summary Sector-summary-Electricity-generation.pdf (theccc.org.uk)

Policy Statement for energy (EN-1) accords the Proposed Development 'Critical National Priority' (CNP) status[6].

1.2.8 The existing Connah's Quay Power Station Site is considered the optimum location for the Proposed Development, due to its proximity to suitable CO_2 transport and storage infrastructure (the HyNet Cluster), while it also offers the benefits of the re-use of existing infrastructure connections, including water, natural gas and electricity.

1.3 The Purpose and Structure of the Pre-application Programme Document

1.3.1 In May 2024 the Government published its 'Nationally Significant Infrastructure Project: 2024 Pre-application Prospectus'[7] ('the Prospectus'), which introduced a new pre-application service for Nationally Significant Infrastructure Projects ('NSIPs') such as the Proposed Development. The new pre-application service is supported by updated guidance published on the Government's 2024 National Infrastructure Planning Guidance Portal.

1.3.2 The Prospectus introduces three pre-application tier options reflecting different levels of service that applicants may receive from the Planning Inspectorate ('PINS') ahead of submitting an application for a NSIP. These are:

- basic
- standard
- enhanced

1.3.3 The Applicant confirmed in its completed Expression of Interest Form, submitted to PINS on 10 July 2024 (along with this Pre-application Programme Document), that it wished to select the 'Standard' pre-application service tier.

1.3.4 PINS confirmed on the 22 August 2024 that the Application will receive the Standard service tier support from 1 October 2024.

1.3.5 The Guidance explains the purpose of preparing a Pre-application Programme Document and sets out what it should cover.

1.3.6 The Guidance states (Paragraph 009 Reference ID 02-009-20240430) that the pre-application process for NSIPs is applicant-led and to deliver a good pre-application process, including effective engagement and a well-prepared application, applicants should put together a Pre-application Programme Document at the outset of the pre-application stage for submission to PINS.

1.3.7 The Guidance further states that the Pre-application Programme Document will enable all those engaged in the pre-application process, particularly statutory consultees, to understand the timescales and ensure their contribution is programmed into the pre-application stage at the most effective point. It will also assist the applicant in managing the preparation and

[6] https://www.gov.uk/government/publications/overarching-national-policy-statement-for-energy-en-1 [accessed on 10 April 2025]
[7] https://www.gov.uk/guidance/nationally-significant-infrastructure-projects-2024-pre-application-prospectus [accessed on 10 April 2025]

subsequent submission of the application documents for consideration by PINS at the acceptance stage.

1.3.8 It is expected that the Applicant will host and maintain the agreed Pre-application Programme Document on its consultation website and update it as necessary during the pre-application stage to publicise completion of significant stages and demonstrate progress in preparation of the application.

1.3.9 While the Pre-application Programme Document is not a statutory requirement and so is not for consultation, the Guidance states that it should include (Paragraph 010 Reference ID 02-010-20240430):

- the date the applicant intends to submit their application
- a comprehensive timetable of the applicant's pre-application process, the main events with dates and milestones demonstrating how the pre-application process will be completed (using the maximum target of 2 years as a benchmark)
- the Applicant's view on the main issues for resolution and activities they will undertake to address those
- the Applicant's proposals for engaging with statutory consultees and local authorities during the pre-application period and any intended financial support agreements, such as Planning Performance Agreements ('PPAs');
- the Applicant's identification of risks to achievement of the pre-application stage and the process by which these risks are tracked and managed; and
- cross references to the SoCC by section 47 of the PA 2008.

1.3.10 This Pre-application Programme Document is structured as follows:

- **Section 2.0** – Sets out the timetable for the Applicant's pre-application process, including key dates/milestones and the anticipated submission date for the application.
- **Section 3.0** – Sets out the Applicant's proposals for pre-application consultation, including engagement with statutory consultees and local authorities during the pre-application stage, with cross-references to the SoCC and the position with regard to any PPA.
- **Section 4.0** – Sets out the main issues for resolution during the pre-application stage, including the activities that will be undertaken to address those issues, and identifies potential risks to the achievement of the pre-application stage.

1.3.11 The Pre-application Programme Document will be published on the Applicant's project consultation website https://uniperuk.consulting/cqlcp/project-overview/ and can be viewed by clicking on the 'Documents' tab.

1.3.12 The Programme Document will be updated periodically throughout the pre-application process.

2. Pre-application Process Timetable

2.1.1 **Table 2.1** below sets out the estimated timetable for the Applicant's pre-application process, including key dates/milestones and the anticipated submission date for the Application. This timetable may be subject to change and the document will be updated as timescales are refined moving forward.

Table 2.1: Pre-application Process Timetable

Activity/Event	Date/Milestone
PINS Inception Meeting	13 December 2023
Project consultation website launch	Early February 2024
Submission of EIA Regulation 8 notification of intention to provide an Environmental Statement ('ES) and EIA Regulation 10 application for an EIA scoping opinion to PINS	8 February 2024
Engagement with statutory consultees and local authorities	Commenced January 2024 – ongoing
Non-statutory consultation	26 February to 25 March 2024
EIA scoping opinion issued by PINS	20 March 2024
Consultation on Statement of Community Consultation ('SoCC')	June /July 2024
Statutory consultation, including provision of Preliminary Environmental Information Report ('PEIR')	8 October 2024 until 19 November 2024. Where additional Section 42 consultees were identified after the start of the consultation, they were given a minimum period of 28 days from being consulted to submit comments. The approach taken by the Applicant in respect of additional Section 42 consultees has been fully explained in the Adequacy of Consultation Milestone (AoCM) Report and Consultation Report.
Meetings with PINS	Project update meetings were held with PINS on 3 December 2024 and 12 March 2024. The Applicant will agree a programme for additional meetings with PINS in the lead-up to submission.
Submission of Draft Documents for PINS review	13 January 2025
Early Adequacy of Consultation Milestone	31 January 2025
Additional targeted consultation	May to June 2025
Application submission	July 2025

3. Proposals for Pre-application Consultation and Engagement

3.1.1 This section sets out the Applicant's proposals for pre-application consultation, including engagement with statutory consultees and local authorities during the pre-application stage and includes cross-references to the SoCC, where appropriate.

3.1.2 The Applicant has already undertaken a stage of non-statutory consultation in respect of the Proposed Development (between late February and March 2024) and consulted on the SoCC during June and July 2024. This section focuses on the statutory consultation, which was between 8 October and 19 November 2024, and its ongoing engagement with statutory consultees and FCC as the local planning and highways authorities. The details of the statutory consultation are set out in **Table 3.1** below.

Table 3.1: Proposals for Pre-application Consultation and Engagement

Method/Activity	Details/Reason for Approach
SoCC consultation	Consultation in June and July 2024 provided host and neighbouring local authorities with an opportunity to shape and influence the Applicant's approach to consultation. All comments and feedback received during this consultation were inputted into the final SoCC where appropriate. The final SoCC document was made available online as part of the Statutory Consultation and was made available in paper format at in-person consultation events and information points for reference during the consultation period.
Consultation Newsletter to Primary Consultation Zone ('PCZ')	The consultation newsletter provided a high-level overview of the Proposed Development, the consultation dates and events, and how people could get involved. The newsletter indicated where the relevant project information could be found and publicised the consultation events, including locations, dates, and times. This was sent to all homes and businesses within the PCZ ahead of the Statutory Consultation and was made available on the consultation website, at events, information points and on request by post. The consultation newsletter was also issued by email to wider consultees, including community groups and hard-to-reach groups. The newsletter was made available in Welsh on the project consultation website, at information points, in-person consultation events and upon request via the project contact centre.
Press release	A local media press release provided wider notification to local stakeholders of the consultation events, reaching stakeholders outside the PCZ. The press release was circulated with local media outlets and trade titles.
Emails	Emails were sent to stakeholders at consultation launch informing them of the Statutory Consultation, upcoming events, how to request further information, and how to provide feedback. This allowed stakeholders to engage with the consultation and to share the consultation information among their networks, such as with local constituents or group members. Stakeholders and those that registered on the project website to be kept informed also received reminder emails during the consultation period and notification that the consultation had closed. This final email gave further details of next steps, and how consultees can stay engaged with the project.
Project Consultation Website	The project consultation website was updated on the launch of the Statutory Consultation. This update provided details of consultation events, consultation materials, and information on how to provide feedback on the project proposals. The website features a document library tab, which lists out all key technical documents available for download. Consultation documents that were made available include the brochure, newsletter, feedback form, SoCC, Preliminary Environmental Information Report (PEIR) and Non-Technical Summary of the PEIR. This allowed stakeholders to engage fully with the consultation, either in person or online. A Welsh translated version of the website was produced containing Welsh versions of the consultation booklet, feedback form, newsletter and Non-Technical Summary of the PEIR for download.

Method/Activity	Details/Reason for Approach
Letters to Section 42 consultees	A letter was sent to prescribed persons (as prescribed by 'The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009' ('APFP Regulations') (as amended)), the Marine Management Organisation (MMO), relevant local authorities and persons with relevant landownership interests. The letter provided information on the Proposed Development, including how the Section 42 consultees can access the Preliminary Environmental Information compiled (documented within the PEIR), how to submit comments and the deadline for doing so.
Statutory Notices and Adverts	Section 48 statutory notices to publicise the consultation were published in local and national news publications in advance of the consultation launching and in accordance with the PA 2008 and the APFP Regulations (as amended). These notices provide information on the Proposed Development, including how to access the PEIR, how to submit comments and the deadline for doing so. Section 48 notices were published as follows: • The Times – 3 October 2024 • London Gazette – 3 October 2024 • Lloyds List – 3 October 2024 • Fishing News – 3 October 2024 • Deeside.com – 3 and 10 October 2024 • The Leader – 3 and 10 October 2024 • Chester Standard – 3 and 10 October 2024 Section 47 notices to publicise the SoCC were published in local news publications in advance of consultation launch and issuing of the Section 48 notice in accordance with the PA 2008 and the APFP Regulations (as amended). These notices provided information on how the Applicant intended to engage with stakeholders and local communities during our upcoming statutory consultation. Section 47 notices were published as follows: • The Chester Standard – 26 September 2024 • The Leader – 26 September 2024 • Wirral Globe – 25 September The Applicant also ran adverts in the local media prior to commencement of the consultation period. The adverts were designed in a clear, accessible format, clearly communicating what the consultation was about, when it was running and how to take part. The Applicant also contacted local town and community councils and invited them to share the advert through their own social channels. Consultation adverts were placed as follows:

Method/Activity	Details/Reason for Approach
	• Wirral Globe – 2 October 2024 • The Leader – 3 October 2024 • The Chester Standard – 3 October 2024 • North Wales Chronicle – 3 October 2024
Consultation posters	Posters advertising the Statutory Consultation were printed and distributed throughout the local area in high footfall locations. The posters were similar in format to the adverts and communicated what the consultation is about, when it is running and how to take part. The Applicant also provided local town and community councils with copies of the poster to display on local notice boards. Consultation poster placement locations included: • Connah's Quay Library, Wepre Drive, CH5 4HA • Connah's Quay Morrisons, Ffordd Llanarth, CH5 4WL • Connah's Quay Swimming Pool, Wepre Drive, CH5 4HA • Deeside Library, Chester Rd E, CH5 1SA • Deeside Leisure Centre, Chester Rd E, CH5 1SA • Flint Sainsbury's, Flintshire Retail Park, Holywell Rd, CH6 5GB • Flint Town Hall, Market Square, CH6 5NW • Flint Library, Church St, CH6 5AP
Information Points	Hard copies of the consultation newsletter, consultation brochure, feedback form and USB sticks containing all consultation materials including the PEIR were available to take home from several local information points within the PCZ. Copies of the SoCC and Non-Technical Summary of the PEIR are also available to inspect at all information points, and a full hard copy of the PEIR was available for reference at the two information points located closest to the Proposed Development. Consultation materials were hosted at the following information points: • Flint Library, Church St, Flint, CH6 5AP (A hard copy of the PEIR was available at this location for reference) • Connah's Quay Library, Wepre Dr, Connah's Quay, CH5 4HA (A hard copy of the PEIR was available at this location for reference) • Buckley Library, The Precinct, Brunswick Rd, Buckley CH7 2EF • Ellesmere Port Library, Civic Way, Ellesmere Port CH65 0BG Holywell Library, Holywell Leisure Centre, North Road, Holywell, Flintshire, CH8 7UZ

Method/Activity	Details/Reason for Approach
Site Notices	Notices were placed in publicly accessible locations within the indicative site boundary of the DCO Application to notify people of the consultation. The Section 46 notice was also issued to PINS on the 1 October 2024.
Online and In-Person Consultation Events	The Applicant held in-person and online consultation events for anyone with an interest in the Proposed Development to attend, learn about the proposals and provide their feedback. In-person events were at venues within the PCZ and were publicised alongside online events, in the consultation newsletter, poster, advert and press release. Interested parties could register to attend online events via the project consultation website, or by contacting the project team directly. Consultation events were held at the following dates, times and locations: • Online webinar 1 – Saturday 19 October 2024, 11:00 – 12:00 • Online webinar 2 – Tuesday 22 October 2024, 13:00 – 14:00 • Conference Centre, Coleg Cambria Deeside, Kelsterton Road, Connah's Quay, CH6 5NW – Wednesday 23 October 2024, 16:00 – 20:00 • Flint Town Hall, Holywell Street, Flint, CH6 5NW – Saturday 26 October 2024, 11:00 – 16:00 • Connah's Quay Cricket Club, 5 Cable Street, Connah's Quay, CH5 4DZ – Thursday 7 November 2024, 13:00 – 18:00 • Online webinar 3 – Monday 4 November 2024, 18:00 – 19:00 In addition to these advertised consultation events, the Applicant also held a pop-up event in a local high-footfall location to speak with people that may not have had the time or opportunity to attend an event. The pop-up event was held during the day at Flint Library on Friday 25 October 2024.
Door knocking	Prior to the commencement of the Statutory Consultation period on Thursday 3 October 2024, the Applicant carried out a door knock of homes and businesses closest to the Proposed Development. Residents/business owners were informed of the upcoming consultation and invited to a one-to-one drop-in session at the Education Centre on the current Connah's Quay Power Station site. Interested residents could book a thirty-minute time slot by contacting the project community relations team. During the drop-in event, which took place on 15 October 2024, attendees were given the opportunity to speak with the project team in confidence and raise any concerns they had regarding the Proposed Development. They were also given the opportunity to take home copies of the consultation brochure, feedback form, newsletter and Non-Technical Summary of the PEIR to further inform their feedback.
Stakeholder Briefings and Previews	Briefings with key political stakeholders were offered prior to the public consultation events, to provide an opportunity for feedback and input. Briefings were conducted both in-person at dedicated consultation exhibition sessions, and

Method/Activity	Details/Reason for Approach
	remotely using webinars. The briefings targeted key affected stakeholders, including FCC and CWCC, the host Member(s) of the UK Parliament and the Senedd, host ward councillors, portfolio holders and host community councils.
Ongoing Engagement	Engagement is on-going with a range of statutory consultees, local authorities and persons/organisations including but not limited to: • Clwyd-Powys Archaeology Trust (CPAT) - Engagement in October 2024 to discuss draft Archaeological Mitigation Strategy. • CADW - Engagement proposed to design changes and confirm existing study areas remain appropriate. • Deeside Naturalist Society - Engagement proposed to provide update on Ecology survey results and mitigation. • Dee Conservancy Harbour Master and Port of Ellesmere Harbour Master - Engagement undertaken from January 2025 (and ongoing) to discuss Navigation matters. - Further engagement proposed in March 2025 on Navigation matters. • Environment Agency (EA) - Engagement has been undertaken in March 2025 to discuss the questions raised in response to Statutory Consultation and the reduction of Order limits. • Flintshire County Council (FCC) - Email engagement in January 2025 to discuss feedback on the Desk Based Assessment and assessment provided in the PEIR. - Engagement undertaken in January 2025 to discuss Ecology, Net Benefit for Biodiversity, Noise, Transport and Cumulative Development matters. - Further engagement proposed to discuss highway design and traffic regulation measures. - Further engagement proposed on drainage design. - Engagement in March 2025 on the scope of the additional targeted consultation

Method/Activity	Details/Reason for Approach
	• Landowners - Engagement in relation to compulsory acquisition. • National Grid Electricity Transmission (NGET) - Engagement proposed in relation to construction impacts in proximity to NGET assets. • Natural Resources Wales (NRW) - Engagement undertaken in December 2024 to provide an update on the works within water connection corridor. - Engagement undertaken in February 2025 to provide update on Ecology survey results and mitigation. - Consultation on the outputs of the Hydraulic Modelling ahead of formal issue for comment (February 2025) - Engagement undertaken in February 2025 to discuss requirements for a Marine Licence. - Further engagement planned on off-site ecological mitigation and air quality modelling. • Royal Society for the Protection of Birds (RSPB) - Engagement undertaken in January 2025 to provide update on Ecology survey results and mitigation. - Further engagement planned on off-site ecological mitigation. • Welsh Government Transport Division - Engagement proposed on details of AILs routes on the strategic road network. • Airbus (Hawarden Airport) - Engagement proposed to discuss aviation safeguarding requirements.

3.1.3 Further to the statutory consultation which has taken place, a targeted consultation is also proposed to take place over the course of May and June 2025. The upcoming additional targeted consultation will run for a minimum of 28 days and will take the following approach to engagement:

- The Applicant will produce a newsletter to explain the need for the additional consultation and how to provide feedback during the consultation period. This will be sent to the same PCZ that was used at Statutory Consultation.
- Key stakeholders will be notified of the consultation via letter and will be invited to dedicated briefing sessions throughout the consultation period. Stakeholders will also be sent a copy of the consultation newsletter and signposted to more detailed information on the Applicant's consultation website.
- The Applicant will not be organising in-person or online consultation events, given the focused nature of the changes, but consultees can ask questions via the contact centre and pick up hard copy materials from a number of information points surrounding the Proposed Development.
- Adverts will be placed in local newspapers to notify those outside the PCZ of the consultation.
- In addition to the newsletter, the Applicant will be producing a Supporting Information Report which will explain the proposed changes to the Proposed Development in greater detail.
- The Applicant will update the consultation website and publish the newsletter and Supporting Information Report for download. The Welsh version of the consultation website will also be updated and a Welsh language version of the consultation newsletter will be provided.
- Consultees will be encouraged to submit any feedback via the contact centre.

3.1.4 The Applicant has a Discretionary Planning Advice agreement in place with NRW and has an agreement in place with the Environment Agency for charged planning advice.

3.1.5 The Applicant is currently in ongoing discussions with FCC and Net Zero Industry Wales ('NZIW') regarding the preparation of a Planning Performance Agreement ('PPA') to engage with the development consent process for the Proposed Development.

4. Issues and Potential Risks

4.1.1 This section sets out the main issues identified to date by the Applicant during the pre-application stage, including the activities that will be undertaken to address those issues. It also identifies potential risks to the achievement of the pre-application stage.

4.1.2 The main issues that have been identified at this point in the pre-application process are set out in **Table 4.1** below.

Table 4.1: Main Issues Identified by the Applicant

Issue	Description of Issue	Management of Issue
Air Quality	Emissions to air from the Proposed Development during operation phase to ecological and human health receptors.	To mitigate operational air quality effects the design of the Proposed Development has evolved. Further modelling is being undertaken to consider effects on sensitive ecological habitats. This assessment will be detailed within the Shadow Habitat Regulations Assessment (sHRA) and will be discussed further with NRW (and where relevant Natural England) ahead of submission of the Application.
Noise and Vibration	Construction road traffic noises associated within increased traffic on Kelsterton Road.	A Framework Construction Traffic Management Plan and Framework Construction Worker Travel Plan have been prepared to detail measures required to minimise construction vehicles movements on Kelsterton Road. .
	Operational noise.	It has been agreed with FCC that an operational L_{A90} sound level limit of no greater than +8 dB (lower where practicable) above background sound level at noise sensitive receptors, is suitable for the Proposed Development
	Construction and Operational noise disturbance on sensitive ecological receptors.	Studies of noise impacts on sensitive ecological receptors are ongoing as part of the sHRA. The methodology is to be agreed with NRW following engagement in March 2025.
Traffic and Transport	Management of AILs deliveries to site.	Further engagement with FCC on the highway works required for the transportation and access of AILs is taking place.
Terrestrial and Aquatic Ecology	Impacts on designated features of adjacent sites of nature conservation.	Impacts on designated features are being considered through the sHRA. These are being discussed with FCC, NRW and the RSPB.

Issue	Description of Issue	Management of Issue
	Delivery of Net Benefit for Biodiversity.	It has been agreed that a 'step-wise' approach to Net Benefit for Biodiversity will be implemented.
	Translocation of reptiles discovered during construction works.	Engagement continues with FCC on a Reptile Mitigation Strategy which will be submitted as part of the Application.
Water Environment and Flood Risk	Flood risk and finished floor levels	Hydraulic modelling has been undertaken and has been discussed with NRW. The model was shared with NRW for approval in March 2025, and will inform the Outline Drainage Strategy and Flood Consequence Assessment.
Landscape and Visual Amenity	Change in visual amenity because of views of construction activity in the construction phase and views of the Proposed Development in the operation phase.	Further engagement is required with FCC to re-confirm agreement on the scope of the landscape and visual assessment following the changes to the CO_2 Absorber Stacks and Heat Recovery Steam Generator (HRSG) Stacks.
Terrestrial Heritage	Changes to setting of designated heritage assets because of the construction and operation of the Proposed Development.	Further engagement is required with CADW to re-confirm agreement on the scope of the landscape and visual assessment following the changes to the CO_2 Absorber Stacks and HRSG Stacks.

4.1.3 **Table 4.2** below sets out potential risks identified by the Applicant to the achievement of the pre-application stage.

Table 4.2: Main Risks Identified by the Applicant

Risk	Description of Issue	Management of Issue
Limited local authority and statutory consultee resources	Limited resources could restrict the ability of FCC and statutory bodies to engage with the Proposed Development and the Applicant.	The Applicant has set up a pre-application advice agreement with NRW. The Applicant is seeking to agree a PPA with FCC to provide sufficient resources to engage in the development consent process. The Applicant is aware of work undertaken on behalf of NZIW looking at the resource requirements within several local authorities across North Wales (including FCC) to support the engagement with several major energy infrastructure projects coming forward. The Applicant is open to discussing this and other working arrangements with FCC and NZIW.
Design changes	The design of the Proposed Development has evolved following statutory consultation.	Extension of programme, additional engagement with statutory bodies and potential for additional targeted consultation.
Timing and adequacy of environmental surveys	Environmental surveys could be delayed due to seasonal restrictions on when they can take place, or the scope of the surveys may not be agreed/considered adequate by statutory consultees and the local authorities.	The Applicant's environmental consultants have proactively arranged environmental surveys so that these are able to take place in line with any seasonal restrictions. They have also engaged with statutory consultees and local authorities where possible to agree the scope of surveys for 2024 and more recently provided updates on the relevant survey findings. Where surveys were restricted for access reasons, these surveys are planned to be undertaken in Spring 2025.
Land required for the Proposed Development	Not all the land required for the Proposed Development is within the control of the Applicant.	Whilst most of the land required for the Proposed Development is within the control of the Applicant, the Applicant's land referencing team is undertaking diligent enquiries to identify all land ownership interests within the Order limits and where appropriate, the Applicant will engage with landowners to negotiate agreements should these be required.

Glossary

Abbreviation	Full Term/Name
APFP Regulations (as amended)	The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 as amended by the Infrastructure Planning (Miscellaneous provisions) Regulations 2024
Applicant	Uniper UK Limited
CCC	The Climate Change Committee
CCGT	Combined Cycle Gas Turbine
CCP	Carbon Capture Plant
CEMP	Construction Environmental Management Plan
CO_2	Carbon Dioxide
CWCC	Cheshire West and Chester Council
DCO	Development Consent Order
DESNZ	Department for Energy Security and Net Zero
EIA	Environmental Impact Assessment – a term used for the assessment of environmental consequences (positive or negative) of a plan, policy, programme or project prior to the decision to move forward with the proposed action
ES	Environmental Statement
FCC	Flintshire County Council
GTP	Gas Treatment Plant
MHWS	Mean High Water Springs
NGET	National Grid Electricity Transmission
NSIP	Nationally Significant Infrastructure Project
NZIW	Net Zero Industry Wales
PA 2008	The Planning Act 2008
PCZ	Primary Consultation Zone
PEIR	Preliminary Environmental Information Report
PINS	The Planning Inspectorate
PPA	Planning Performance Agreement
Proposed Development	The Connah's Quay Low Carbon Power ('CQLCP') Project
SAC	Special Area of Conservation
SoCC	Statement of Community Consultation
SoS	Secretary of State for Energy Security and Net Zero
sHRA	Shadow Habitats Regulation Assessment
SPA	Special Protection Area
SSSI	Site of Special Scientific Interest