Connah's Quay Low Carbon Power

Draft Liverpool Bay CCS Limited SoCG

Planning Inspectorate Reference: EN010166
Document Reference: EN010166/APP/8.13
Planning Act 2008 (as amended)
Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 - Regulation 5(2)(q)
Revision 00

August 2025

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1. Introduction

1.1 Purpose of this Document

1.1.1 This Statement of Common Ground (SoCG) has been prepared to support the application (the Application) for the Connah's Quay Low Carbon Power Project (the Proposed Development) made by Uniper UK Limited (the Applicant). The Application was submitted to the Secretary of State for a Development Consent Order (DCO) (the Order) under section 37 of the Planning Act 2008 in July 2025.

1.1.2 This SoCG does not seek to replicate information which is available elsewhere within the Application documents.

1.1.3 SoCGs are an established means in the planning process of allowing all parties to identify and so focus on specific issues that may need to be addressed during the examination. This SoCG has been produced to confirm to the Examining Authority (ExA) where agreement has been reached between the parties and where matters are under discussion or where agreement has not been reached. The SoCG will be progressed during the pre-examination and examination periods to reach a final position between the Parties and to clarify if any issues remain unresolved. This SoCG will be revised and updated as appropriate and/or required by the ExA at relevant examination deadlines.

1.1.4 This SoCG has been shared with Liverpool Bay CCS Limited (LBCCS) in draft ahead of submission of the Application but does not include inputs directly from LBCCS. The Applicant will continue to engage with LBCCS Limited on the content of this SoCG.

1.2 Parties to this Statement of Common Ground

1.2.1 This SoCG has been prepared between (1) the Applicant and (2) LBCCS (jointly referred to as the Parties).

The Applicant:

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

1.2.3 Uniper is committed to investing around €8 billion (~£6.9 billion) in growth and transformation projects by the early 2030s and aims to be carbon-neutral by 2040. To achieve this, the company is transforming its power plants and facilities and investing in flexible, dispatchable power generation units. Uniper is one of Europe's largest operators of hydropower plants and is helping further expand solar and wind power, which are essential for a

more sustainable and secure future. Uniper is gradually adding renewable and low-carbon gases such as biomethane to its gas portfolio and is developing a hydrogen portfolio with the aim of a long-term transition. The company plans to offset any remaining CO2 emissions by high-quality CO2-offsets.

Liverpool Bay CCS Limited:

1.2.4 LBCCS is a subsidiary of Eni UK Limited. LBCCS is promoting the HyNet Carbon Dioxide Pipeline Project, which was granted development consent in March 2024.[1]

1.2.5 The HyNet Carbon Dioxide Pipeline Project is adjacent to and overlaps with the Proposed Development. LBCCS will take the benefit of the Order for the purposes of certain specific works as part of the Proposed Development.

1.3 The Proposed Development

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

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

1.3.3 Through a carbon dioxide (CO2) pipeline, comprising existing and new elements, the Proposed Development would make use of CO2 transport and storage networks owned and operated by LBCCS, currently under development as part of the HyNet Carbon Dioxide Pipeline project (referred to as the 'HyNet CO2 Pipeline Project'), that will transport CO2 captured from existing and new industries in North Wales and North-West England, for offshore storage. The captured CO2 will be permanently stored in depleted offshore gas reservoirs in Liverpool Bay.

1.3.4 For the purposes of the electrical connection, National Grid Electricity Transmission plc (NGET), which builds and maintains the electricity transmission networks, is responsible for the operation and maintenance of the existing 400 kV NGET Substation.

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

[1] The HyNet Carbon Dioxide Pipeline Order 2024, https://www.legislation.gov.uk/uksi/2024/436/contents (accessed 11 May 2025).

1.4 Terminology

1.4.1 Section 3 summarises the issues that are 'agreed', 'not agreed' or are 'under discussion'.

1.4.2 These terms are used as follows:

a. "Agreed" indicates where the issue has been resolved;

b. "Under discussion" indicates where these points will be the subject of on-going discussion wherever possible to resolve, or refine, the extent of disagreement between the parties; and

c. "Not Agreed" indicates a final position where the Parties have agreed to disagree.

2. Record of Engagement

2.1.1 A summary of all meetings and correspondence that have taken place between the Parties in relation to the Application is outlined in **Table 1**. This includes email correspondence between the Parties to discuss sharing of information, arrangement of meetings and where appropriate to comment on draft documentation. **Table 1** reflects the key meetings and emails of note.

Table 1: Record of Engagement

Date	Form of Correspondence and Attendees	Key Topics Discussed and Key Outcomes
Fortnightly from 04 December 2023 until 02 June 2025	Meeting between the Applicant and LBCCS	Discussion of interface between the Proposed Development and the HyNet Carbon Dioxide Pipeline Project.
Weekly from 09 June 2025	Meeting between the Applicant and LBCCS	Discussion of interface between the Proposed Development and the HyNet Carbon Dioxide Pipeline Project.
16 December 2024	Email from the Applicant to LBCCS	Discussion on land rights relating to the connection points between the Proposed Development and the HyNet Carbon Dioxide Pipeline Project.
20 December 2024	Email from the Applicant to LBCCS.	Sharing a copy of the protective provisions to be included in Part 1 of the draft DCO.
14 January 2025	Email from the Applicant to LBCCS.	Follow-up on preferred protective provisions position.
22 January 2025	Email from the Applicant to LBCCS.	Follow-up on preferred protective provisions position.
27 January 2025	Email from LBCCS to the Applicant	Response relating to the land rights connecting the Proposed Development and the HyNet Carbon Dioxide Pipeline Project.
3 February 2025	Call between the Applicant and LBCCS	Discussion of interface between the Proposed Development and the HyNet Carbon Dioxide

Date	Form of Correspondence and Attendees	Key Topics Discussed and Key Outcomes
		Pipeline Project, including engaging LBCCS's technical and legal input on aspects of the Proposed Development, including protective provisions.
3 February 2025	Email from the Applicant to LBCCS	Follow-up email following above discussions on the call including a cost recovery proposal to cover LBCCS's legal fees for input on aspects of the Proposed Development, including protective provisions.
11 February 2025	Email from the Applicant to LBCCS	Proposed draft co-operation agreement shared with LBCCS.
14 February 2025	Email from LBCCS to the Applicant	Confirmation that draft agreement and cost recovery proposal are being considered internally by LBCCS.
17 February 2025	Email from the Applicant to LBCCS	Requesting comments on draft agreement and proposing a call to discuss.
17 February 2025	Email from LBCCS to the Applicant	Holding response.
24 February 2025	Email from the Applicant to LBCCS	A further request for comments on the draft agreement.
24 February 2025	Email from LBCCS to the Applicant	Comments provided by LBCCS to the Applicant on draft co-operation agreement.
27 February 2025	Call between the Applicant and LBCCS	Discussion on draft co-operation agreement.
28 February 2025	Email from the Applicant to LBCCS	Revised draft co-operation agreement shared with LBCCS.
5 March 2025	Email from the Applicant to LBCCS	Requesting comments on draft agreement.

Date	Form of Correspondence and Attendees	Key Topics Discussed and Key Outcomes
5 March 2025	Email from LBCCS to the Applicant	Comments provided by LBCCS to the Applicant on draft co-operation agreement.
6 March 2025	Email from LBCCS to the Applicant	Further comments provided by LBCCS to the Applicant on draft co-operation agreement.
10 March 2025	Email from the Applicant to LBCCS	Confirmation of agreement and request for final comments on draft-co-operation agreement.
10 March 2025	Email from LBCCS to the Applicant	Confirmation that internal approval for agreement outstanding.
18 March 2025	Email from LBCCS to the Applicant	Further comments provided.
25 March 2025	Email from the Applicant to LBCCS	Final draft version shared with LBCCS for sign-off ahead of signature.
31 March 2025	Email from the Applicant to LBCCS	Requesting sign-off on final version of agreement.
31 March 2025	Email from LBCCS to the Applicant	Holding response.
2 April 2025	Email from the Applicant to LBCCS	Requesting sign-off on final version of agreement and circulation of execution version agreement.
2 April 2025	Email from LBCCS to the Applicant	Confirmation of sending agreement through final approval process for execution.
4 April 2025	Email from the Applicant to LBCCS	Confirmation that Applicant has signed its counterpart of the draft agreement and requesting timing for completion.
4 April 2025	Email from LBCCS to the Applicant	Confirmation that document submitted for

Date	Form of Correspondence and Attendees	Key Topics Discussed and Key Outcomes
		approval with completion expected imminently.
8 April 2025	Email from the Applicant to LBCCS	Requesting confirmation on signature timing.
10 April 2025	Email from LBCCS to the Applicant	Holding response.
14 April 2025	Email from the Applicant to LBCCS	Requesting confirmation on signature timing.
14 April 2025	Email from LBCCS to the Applicant	Holding response.
22 April 2025	Email from the Applicant to LBCCS	Requesting confirmation on signature timing.
30 April 2025	Email from the Applicant to LBCCS	Requesting confirmation on signature timing.
7 May 2025	Email from LBCCS to the Applicant	Holding response.
12 May 2025	Email from LBCCS to the Applicant	Further comments raised on draft agreement.
14 May 2025	Email from LBCCS to the Applicant	Further comments raised on draft agreement.
20 May 2025	Email from the Applicant to LBCCS	Response to comments on draft Agreement.
27 May 2025	Email from LBCCS to the Applicant	Request for response on further comments.
27 May 2025	Email from the Applicant to LBCCS	Response to comments on draft Agreement.
28 May 2025	Email from LBCCS to the Applicant	Request for call to discuss draft agreement.
2 June 2025	Call between the Applicant and LBCCS	Discussion of interface between the Proposed Development and the HyNet Carbon Dioxide Pipeline Project, including engaging LBCCS's technical and legal input on aspects of the Proposed Development, including protective provisions.
10 June 2025	Emails between the Applicant and LBCCS	Agreeing final comments to the draft

Date	Form of Correspondence and Attendees	Key Topics Discussed and Key Outcomes
		Agreement and circulating execution version
10 June 2025	Meeting with LBCCS and the Applicant	Discussing DCO matters.
13 June 2025	Emails between the Applicant and LBCCS	Confirming signed counterparts held and completion of Co-operation Agreement governing cost recovery mechanisms to cover LBCCS's fees (including legal fees) for input and review of aspects of the Proposed Development, including protective provisions.
13 June 2025	Email from LBCCS's solicitors to the Applicant's solicitors	Containing comments on the draft DCO.
19 June 2025	Email from the Applicant's solicitors to LBCCS's solicitors	Responding to comments on the draft DCO.
24 June 2025	Meeting with LBCCS and the Applicant	Discussing comments on the draft DCO.
3 July 2025	Email from LBCCS's solicitors to the Applicant's solicitors	Providing further comments on the draft DCO.
9 July 2025	Email from LBCCS's solicitors to the Applicant's solicitors	Providing proposed side agreement terms and further comments on the draft DCO.
10 July 2025	Email from the Applicant's solicitors to LBCCS's solicitors	Responding to comments on the draft DCO.

3. Areas of Discussion between the Parties

3.1.1 **Table 2** below details the areas of discussion and matters that are agreed, under discussion and not agreed between the Parties.

Table 2: Areas of Discussion between the Parties

Ref.	Subject	Relevant Application Document	Applicant Position	LBCCS Position	Status	Likelihood of resolution
1	Protective Provisions	**Draft DCO (EN010166/APP/3.1)**	The Draft DCO should include specific provisions for the protection of LBCCS.	The Draft DCO should include specific provisions for the protection of LBCCS including for assets, rights and powers of LBCCS under the HyNet carbon dioxide DCO, the new AGI to be constructed as part of work No. 1 and the existing Eni pipeline which is to be transferred to LBCCS.	Under discussion	High
2	Authorised Development	**Draft DCO (EN010166/APP/3.1)**	The description of the authorised development in Schedule 1 of the **Draft DCO (EN010166/APP/3.1)** is under discussion.	The description of the authorised development in Schedule 1 of the **Draft DCO (EN010166/APP/3.1)** is under discussion.	Under discussion	High
3	Land acquisition	**Land Plans (EN010166/APP/2.2)** **Book of Reference (EN010166/APP/4.1)**	The Applicant's approach to land acquisition is required for the delivery of the Proposed Development.	LBCCS have made some requests for changes which are being considered by the Applicant. This is not agreed at this time – may be resolvable in principle before application but subject also agreement on protective provisions and potentially a side agreement.	Under discussion	High

4. Approvals

4.1 The Applicant

Signed: _____

Name: _____

Position: _____

Date: _____

4.2 Liverpool Bay CCS Limited

Signed: _____

Name: _____

Position: _____

Date: _____

Abbreviations

Abbreviation	Term
AIL	Abnormal Indivisible Loads
BAT	Best Available Technique
BESS	Battery Energy Storage System
CCGT	Combined Cycle Gas Turbine
CCP	Carbon Capture Plant
CEMP	Construction Environmental Management Plan
CO_2	Carbon Dioxide
COMAH	Control of Major Accident Hazards
CQLCP	Connah's Quay Low Carbon Power
DAS	Discretionary Advice Service
DESNZ	Department for Energy Security and Net Zero
DCO	Development Consent Order
EA	Environment Agency
ECoW	Ecological Clerk of Works
ES	Environmental Statement
ExA	Examining Authority
FCA	Flood Consequence Assessment
FEED	Front-End Engineering Design
GHG	Greenhouse Gas
HRA	Habitats Regulations Assessment
MA&Ds	Major Accidents and Disasters
MW	Megawatts
MWe	Megawatts for electrical output
NBB	Net Benefits for Biodiversity
NGET	National Grid Electricity Transmission
NO_2	Nitrogen Dioxide
NO_x	Nitrogen Oxide
NRW	Natural Resources Wales
oBSMP	outline Battery Safety Management Plan
PEA	Preliminary Ecological Appraisal
SAC	Special Area of Conservation
SoCG	Statement of Common Ground
SoS	Secretary of State
SPA	Special Protection Area

SSSI	Sites of Special Scientific Interest
SWMP	Outline Site Waste Management Plan
ZTV	Zone of Theoretical Visibility