Connah's Quay Low Carbon Power

Draft Deeside Naturalist Society SoCG

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Prepared for:
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Prepared by:
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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.

1.2 Parties to this Statement of Common Ground

1.2.1 This SoCG has been prepared between (1) the Applicant and (2) the Deeside Naturalists Society (DNS) (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 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. 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 CO_2 emissions by high-quality CO_2-offsets.

Deeside Naturalists Society

1.2.4 The DNS is a registered charity, formed in 1973 to *'stimulate interest in natural history and to play a part in the conservation of flora and fauna on Deeside and in the surrounding area'.*

The DNS has over 400 members who receive regular newsletters and an annual programme card of events and field meetings which are organised throughout the year to places of special ecological interest and importance. Members are provided with a key to access the Connah's Quay Nature Reserve adjacent to the Order limits and may visit in line with the strict rules in place with Uniper. DNS manage the wildlife hides within the reserve and carry out scientific monitoring of birds and other wildlife on a daily basis, both on the nature reserve and adjoining areas including the area proposed for development of the new power station.

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 (CO_2) pipeline, comprising existing and new elements, the Proposed Development would make use of (CO_2) transport and storage networks owned and operated by Liverpool Bay CCS Limited, currently under development as part of the HyNet Carbon Dioxide Pipeline project (referred to as the 'HyNet (CO_2) Pipeline Project'), that will transport CO2 captured from existing and new industries in North Wales and North-West England, for offshore storage. The captured (CO_2) 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.

1.4 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
13 February 2024	Meeting – in person between both Parties	A meeting to introduce the Proposed Development and to provide a non-statutory consultation briefing by the Applicant to the DNS.
29 May 2024	Meeting – in person between both Parties	A meeting as part of the working group for both Parties to discuss the Proposed Development. Discussions were around temporary access being provided through construction, and permanent access routes following construction. Discussions were also in relation to ornithological interest of the Main Development Area.
24 October 2024	Meeting – in person between both Parties	A meeting to provide DNS with further updates on the Proposed Development. Also discussed were the proposed works for the Field study centre and bunded pools, as well as the National Grid re-cabling project.

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	Deeside Naturalists Society Position	Status	Likelihood of resolution
1	Temporary access	**Chapter 5: Construction Programme and Management (EN010166/APP/6.2.5)**	Provision of alternative temporary access to the Connahs Quay Power Station Nature Reserve would be provided for the DNS during construction.	Provision of alternative temporary access to the Connahs Quay Power Station Nature Reserve would be provided for the DNS during construction.	Agreed	N/A
2	Permanent access	**Chapter 5: Construction Programme and Management (EN010166/APP/6.2.5)**	Provision of a permanent access road to maintain access to the bird hides during operation would be provided.	Provision of a permanent access road to maintain access to the bird hides during operation would be provided.	Agreed	N/A
3	Management of the Connahs Quay Nature Reserve	**Chapter 11: Terrestrial and Aquatic Ecology (EN010166/APP/6.2.11)** **Outline Landscape and Ecological Management Plan (OLEMP) (EN010166/APP/6.9)**	Ongoing management of the Connahs Quay Nature Reserve will be secured by the **OLEMP (EN010166/APP/6.9)**.	Ongoing management of the Connahs Quay Nature Reserve will be secured by the **OLEMP (EN010166/APP/6.9)**.	Agreed	N/A
4.	Adverse effects on birds using the Dee Estuary Special Area of Conservation, Special Protection Area and Ramsar site	**Chapter 11: Terrestrial and Aquatic Ecology (EN010166/APP/6.2.11)** **Outline LEMP (EN010166/APP/6.9),** **Framework Construction Environmental Management Plan (CEMP) (EN010166/APP/6.5)** **Lighting Strategy (EN010166/APP/7.22)**	The Applicant recognises the importance of curlew *Numenius arquata* as a qualifying feature of the Dee Estuary SPA/ Ramsar designation. The scope of the terrestrial and aquatic ecology assessment is appropriate and comprehensive and has been agreed with NRW. The study area for gathering baseline species and habitats information is appropriate to the nature of the Proposed Development and its potential effects. Section 11.4 of **Chapter 11: Terrestrial and Aquatic Ecology (EN010166/APP/6.2.11)** provides a summary of the baseline conditions within the study area and identifies which ecological features are taken forward for consideration within the assessment presented in Section 11.6. The terrestrial and aquatic ecology assessment has adequately assessed the likely significant effects of the Proposed Development on the receptors identified in **Chapter 11: Terrestrial and Aquatic Ecology (EN010166/APP/6.2.11)**.	This Statement of Common Ground does not cover all of the key points DNS has made during the consultation process, though here, in summary, are two key issues: • DNS consider that a significant direct adverse impact on birds using the site is 'certain', rather than 'cannot be ruled out'. There is a wealth of data showing that the fields proposed for development are used by large numbers of foraging Curlew. This species is one of the qualifying migratory species for the Dee Estuary SPA/Ramsar designation. • DNS consider that significant adverse impacts of disturbance effects from noise, lighting and human activity on birds using the Dee Estuary SPA/Ramsar site/SAC is 'highly likely' both during and after construction, rather than 'cannot be ruled out'.	Under discussion	High

			All relevant mitigation and monitoring measures are captured within the **Outline LEMP (EN010166/APP/6.9)**, **Framework CEMP (EN010166/APP/6.5) or** the **Lighting Strategy (EN010166/APP/7.22)** where applicable, and the preparation, approval and implementation of final versions of these documents is secured through the relevant requirements in the **Draft DCO (EN010166/APP/3.1)**.			

4. Approvals

4.1 The Applicant

Signed: _____

Name: _____

Position: _____

Date: _____

4.2 Deeside Naturalist Society

Signed: _____

Name: _____

Position: _____

Date: _____

References

Ref 1. Stationary Office (2009). The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009. Accessed 16/10/2024 at The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009

Ref 2. WRAP, Quality Protocol, Aggregates from Inert Waste. Available at: CD1.Y_Quality_Protocol._Aggregates_from_inert_waste._End_of_waste_criteria_for_the_production_of_aggregates_from_inert_waste._WRAP_October_2013..pdf

Ref 3. Environment Agency and Department for Environment, Food & Rural Affairs (Defra), 2016; Air emissions risk assessment for your environmental permit guidance [online]. Available at: https://www.gov.uk/guidance/air-emissions-risk-assessment-for-your-environmental-permit (Accessed 03/06/2025).

Ref 4. UK Government (2017) The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017. Available at: https://www.legislation.gov.uk/uksi/2017/572/schedule/4

Ref 5. Cutts, N., Phelps, A., Spencer, J., & Hemmingway, K. (2013). Waterbird disturbance mitigation toolkit. Tide toolbox, Interreg IVB North Sea Region Programme.

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