



liverpool bay ccs limited

Registered Office
Liverpool Bay CCS Limited
Eni House, 10 Ebury Bridge Road
London SW1W 8PZ
United Kingdom



Ms. Pope
Senior Planning Officer
Flintshire County Council
County Hall
Mold
Flintshire
CH7 6NF

Ref: PF.2.2

15 August 2025

Dear Ms. Pope,

Full planning application for the Point of Ayr (PoA) Cable Route Foreshore Works, located to the north-west of the PoA Gas Terminal, Flintshire.

On behalf of Liverpool Bay CCS Limited (LBCCS) (the "Applicant"), a member of the Eni SpA group, please find enclosed a full planning application for the installation of an underground section of Horizontal Directional Drilling (HDD) conduit under Gronant Dunes originating from the HDD Entry Pit (consented under FUL/000246/23), to a buried HDD Exit Pit at the Mean High Water Spring (MHWS) line, and burial of a combined electrical and fibre optic cable across Talacre Beach and Foreshore to the Mean Low Water Spring (MLWS) line, located to the north-west of the Point of Ayr (PoA) Gas Terminal ("the Proposed Development").

The full planning application was submitted via Planning Portal Wales on 15 August 2025 under reference PP-14040832. The application fee of £98,525.00 has been paid by WSP on behalf of the Applicant to Flintshire County Council (FCC) as the Local Planning Authority.

The Proposed Development forms part of the wider Liverpool Bay CO₂ Transportation and Storage infrastructure to serve the wider HyNet North West project. HyNet is a low carbon hydrogen and carbon capture, transport and storage project that will unlock a low carbon economy for the North West of



England and North Wales and put the region at the forefront of the UK's drive to Net Zero.

The Proposed Development is seeking re-authorisation of the cable route element of the works consented under application reference no: FUL/000246/23 granted in May 2024 ("the Consented Development") but on a new alignment that is approximately 250m further east along Talacre beach.

The proposed realigned route, in its entirety, will start from the original HDD entry pit location as specified in the Consented Development creating a more direct path, in an approximate north-westerly direction, under the dune system, and across Talacre Beach, and the Welsh Channel, to the gap between the sand banks to the east of West Hoyle Spit and onwards to the New Douglas Offshore Platform.

The project programme for the Proposed Development is driven by the limited availability of the cable laying vessel, which is only accessible between March and August 2026. To align with this programme, the Applicant must commence preparatory works, such as Horizontal Directional Drilling by February 2026. Given these time constraints, the Applicant requests FCC for a timely determination of this planning application. The Applicant would also like to draw attention to Natural Resources Wales' (NRW) decision on 22 May 2025 to grant the Applicant's Marine Licence Application (CML2365), which consents the proposed realigned route within NRW's jurisdiction i.e. past the Mean Low Water Springs (MLWS) mark.

An Environmental Impact Assessment (EIA) Screening Opinion under the Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017 ("the EIA Regulations") was obtained from FCC on 30 May 2025 which confirmed that the potential impacts would not be significant as to require the submission of a formal EIA.

The Applicant submitted a formal request for pre-application advice to FCC on March 17 2025 with the formal advice issued by FCC on 30 May 2025 under reference no: [REDACTED]. The advice outlines a list of documents and plans required to be submitted with the application. For some of the requested documentation, the Applicant has addressed the issues directly within the Planning, Design and Access (PDAS) document, instead of submitting standalone assessments. Where this approach has been taken, this has been outlined and justified in the table below.



Document to be addressed in the PDAS	Reasons for addressing in PDAS
Noise Impact Assessment	The planning validation requirements currently available on Flintshire County Council's website¹ state at Paragraph A19 that <i>"Applications for developments that raise issues of disturbance by noise to the occupants of nearby existing buildings, and for developments that are considered to be noise sensitive and which are close to existing sources of noise should be supported by a noise assessment prepared by a suitably qualified acoustician"</i> It has been identified that there is the potential for noise impacts arising through the Proposed Development's construction phase. These impacts will be minimised through the implementation of measures set out in the Construction Environment Management Plan (CEMP). At request from Natural Resources Wales the impact of Electromagnetic Fields (EMF) arising from the Proposed Development through its operation were investigated. It was concluded that impacts associated with EMF will be negligible. Given the above it is considered that a separate Noise Impact Assessment is not required to support the Proposed Development's application nor for the application to be considered valid. Matters pertaining to noise are considered within the PDAS itself.
Lighting Assessment	The requirements for a lighting assessment are not set out in the planning validation requirements referenced above. During its operation the Proposed Development will be wholly underground and therefore no lighting is required. The EIA Screening Request identified that some lighting may be required during at the Horizontal Directional Drilling (HDD) Exit Pit during the Proposed Development's construction. The measures set out in the CEMP will minimise the impacts of lighting.

¹ <https://www.flintshire.gov.uk/en/PDFFiles/Planning/Planning-Application-Requirements.pdf>



	Given the above it is considered that a separate Lighting Assessment is not required to support or validate the Proposed Development's application. Lighting is therefore considered within the PDAS itself.
Transport Assessment	The validation requirements referenced above states that a Transport Assessment (TA) is required when a development crosses the thresholds outlined in Planning Policy Wales (PPW) 4. PPW12 is now the most recent edition of PPW.² PPW12 states that the TAs are required to accompany planning applications for developments, including changes of use, falling into the categories identified in Technical Advice Note (TAN) 18: Transport must be accompanied by a Transport Assessment. TAN18 states that <i>"TAs should be secured for developments (including extensions or changes of use) that generate significant levels of movement or are likely to have significant effects on existing patterns of movement."</i> The Proposed Development will not generate significant levels of movement or significant impacts on existing patterns of movement. Construction traffic will be managed by the Construction Traffic Management Plan secured via the Consented Development. Given the above it is considered that a separate Transport Assessment to support the Proposed Development's application is not required for the application to be considered valid and therefore, matters relating to transport are instead considered in the PDAS.
Public Rights of Way Strategy	It is considered that a separate Public Rights of Way (PRoW) Strategy to support the Proposed Development's application is not required for the application to be considered valid and therefore, matters relating PRoWs are instead considered in the PDAS.

The remaining documentation requested in PRE/00060/25 has been addressed in standalone assessments submitted alongside this application, summarised in the table below, with the exception of the requested *"...completed Pro-forma within Supplementary Planning Guidance Note 29 and any drainage details*

² <https://www.gov.wales/sites/default/files/publications/2024-07/planning-policy-wales-edition-12.pdf>



proposed." The requested pro-forma within Supplementary Planning Guidance 29 relates to the Management of Surface Water for New Development. All elements of the operational Proposed Development will be underground and will have no residual impact on surface water and is therefore not required.

Document requested	Standalone Document Title (Doc Ref)
Location plan showing the red line application boundary to include the access roads and a blue line to show land in the control of the applicant	Site Location Plan (UK0029984.4176-PF.2.7-SLP-Sheet1)
Site Plan showing traffic routing, any parking areas	Proposed Site Plan (UK0029984.4176-PF.2.9-LAY-Sheet1) Please refer to the Construction Environmental Management Plan (PF.3.6) for information on Traffic Routing and Parking Areas.
Investigation of the potential environmental impacts	Environmental Studies Report (PF.3.2)
Impact on residential amenity from noise, air quality/emissions, nuisance and odour, and lighting, including any proposed mitigation measures	Construction Environmental Management Plan (PF.3.6)
Green Infrastructure assessment including details of Net Benefits for Biodiversity	Net Benefit for Biodiversity (NBB) and Green Infrastructure Statement (PF.3.5)
Any mitigation proposed to ensure that there is no significant likely effect on the Special Area of Conservation	Construction Environmental Management Plan (PF.3.6)
Pre-application Consultation (PAC) Report as detailed above	Pre-Application Consultation Report (PF.2.12)

In consideration of the above, this application is accompanied by the following supporting documents and plans, which have been submitted electronically via Planning Portal Wales:



DOCUMENTS

- Application Form (document reference: PF.2.1)
- Covering Letter (document reference: PF.2.2)
- Ownership Certificate B (document reference: PF.2.3)
- Copy of Article 10 Notice 1 (document reference: PF.2.4)
- Copy of Article 10 Notice 1 Cover Letter (document reference: PF.2.5)
- Planning, Design and Access Statement (PDAS) (document reference: PF.2.11)
- Pre-application Consultation (PAC) Report (document reference: PF.2.12)
- Environmental Studies Report (document reference: PF.3.2)
- Habitat Regulations Assessment (HRA) (document reference: PF.3.3)
- Water Framework Directive Assessment (document reference: PF.3.4)
- Net Benefit for Biodiversity (NBB) Assessment (document reference: PF.3.5)
- Construction Environmental Management Plan (CEMP) (document reference: PF.3.6)
- Written Scheme of Investigation (WSI) (document reference: PF.3.7)

PLANS

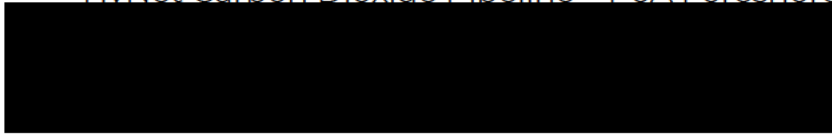
- Site Location Plan (drawing reference: UK0029984.4176-PF.2.7-SLP-Sheet1)
- Existing Cable Route Foreshore Works Site Plan (drawing reference: UK0029984.4176-PF.2.8-LAY-Sheet1)
- Proposed Cable Route Foreshore Works Site Plan (drawing reference: UK0029984.4176-PF.2.9-LAY-Sheet1)
- For Information Only: Site Location Plan - Proposed and Consented Development (drawing reference: UK0029984.4176-PF.2.11-SLP-Sheet1)

The Proposed Development includes use of the foreshore for carrying out works associated with the development. The foreshore is owned by The Crown Estate and is therefore defined as Crown land in accordance with section 293 of the Town and Country Planning Act 1990. The Applicant accordingly hereby states for the purposes of Regulation 6(a) of the Town and Country Planning (Development Management Procedure) (Wales) Order 2012 that the application includes Crown land.

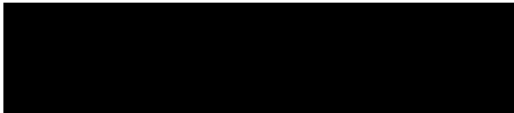


We trust the information provided is sufficient to determine the planning application. If you have any queries, please contact our Planning Agent (WSP) as follows:

HvNet Carbon Dioxide Pipeline – PoA Foreshore Works Planning Agent –



Yours sincerely,



Stefano Rovelli
Managing Director, Liverpool Bay CCS Ltd