

PRE-APPLICATION CONSULTATION REPORT

Point of Ayr Cable Route Foreshore Works

Town and Country Planning Act 1990

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EXECUTIVE SUMMARY

The Point of Ayr (PoA) Cable Route Foreshore Works Pipeline Proposed Development (“the Proposed Development”) is seeking re-authorisation for part of the same cable installation works already consented under application reference number: FUL/000246/23 granted in May 2024 (“the Consented Development”), but on a new alignment that is approximately 250m further east along Talacre Beach. This realignment was necessitated by stakeholder feedback on the original Marine Licence (ML) application to reduce impact on vessel movements in and out of the Port of Mostyn.

The Proposed Development forms part of the Liverpool Bay CO₂ Transportation and Storage (T&S) infrastructure to serve the wider HyNet project. HyNet is a low carbon hydrogen and carbon capture, transport and storage project that will unlock a low carbon economy for north Wales and the north west of England and put the region at the forefront of the UK's drive to Net Zero. The combined electrical and fibre-optic cable will connect the onshore grid at the PoA Terminal to the New Douglas Offshore Platform (OP) in Liverpool Bay, to supply the power and upgraded telecommunications needed to support the receipt and distribution of CO₂ to the storage sites.

The Proposed Development comprises 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 on a new alignment to the Mean Low Water Spring (MLWS) line, located to the north-west of the PoA Terminal.

The Proposed Development is seeking express planning consent from Flintshire County Council (FCC) via a full planning application pursuant to the Town and Country Planning Act (TCPA) 1990 (as amended). As the Proposed Development is located in Wales, it is subject to statutory Pre-Application Consultation (PAC) requirements pursuant to the Planning (Wales) Act 2015.

The PAC took place between 16 June and 14 July 2025 and received nine responses from Specialist and technical consultees and the public.

This PAC Report sets out the consultation activities, the feedback received and the Applicant's response to the issues raised.

1. INTRODUCTION

BACKGROUND AND CONTEXT

- 1.1.1. This Pre-Application Consultation (PAC) Report has been prepared by WSP UK Ltd on behalf of Liverpool Bay CCS Limited (LBCCS), a member of the Eni SpA group (“the Applicant”), in relation to the Point of Ayr (PoA) Cable Route Foreshore Works Proposed Development (“the Proposed Development”).
- 1.1.2. The Proposed Development comprises 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 on a new alignment to the Mean Low Water Spring (MLWS) line, located to the north-west of the PoA Terminal.
- 1.1.3. The Proposed Development comprises a realignment of the cable route consented PoA Terminal and Foreshore Works (“the Consented Development”) that was granted planning permission in May 2024 [FUL/000246/23] by Flintshire County Council (FCC) Planning Committee. The Consented Development comprises new infrastructure and modifications to existing facilities at the PoA Terminal in Flintshire to operate with carbon dioxide (CO₂).
- 1.1.4. Feedback was received from the Port of Mostyn in response to the original Marine Licence (ML) application that was submitted to consent the works within the marine area of the Consented Development. To address the Port of Mostyn concerns, a realignment of the works was proposed to avoid impacts on vessel movements in and out of the port. To satisfy the marine consenting requirements for the realigned route, Natural Resources Wales Marine Licencing Team (NRW-MLT) granted the revised ML [application reference: CML2365] on 22 May 2025.
- 1.1.5. To match the ML, the Proposed Development comprises the realignment of the cables within the foreshore area from the HDD Entry Pit to the HDD Exit Pit at the MHWS line, which lies outside of the planning application area approved under planning permission FUL/000246/23 (the Consented Development).
- 1.1.6. Therefore, consent for the new cable alignment is being sought from FCC through the submission of a new Town and Country Planning Application (TCPA) 1990 (as amended). The new TCPA is seeking re-authorisation for part of the same cable installation works already consented under application reference number: FUL/000246/23 granted in May 2024, but on a new alignment below Gronant Dunes and Talacre Beach. These works will utilise the same construction methodology, but

on a new alignment that is approximately 250m further eastwards along Talacre Beach.

- 1.1.7. The Consented Development, and Proposed Development, form part of the Liverpool Bay CO₂ Transportation and Storage (T&S) infrastructure to serve the wider HyNet Project. HyNet is a low carbon hydrogen and carbon capture, transport and storage project that will unlock a low carbon economy for north Wales and the north west of England and put the region at the forefront of the UK's drive to Net Zero.
- 1.1.8. The Consented Development and Proposed Development will form part of the wider HyNet Project ("the Project") that will transport CO₂ captured from existing industry in north Wales and the north west of England, as well as from new hydrogen production facilities. The captured CO₂ will be stored in depleted offshore gas reservoirs.
- 1.1.9. The Project is a Nationally Significant Infrastructure Project (NSIP) that was granted a Development Consent Order (DCO) from the Secretary of State for Energy Security and Net Zero in March 2024 [Planning Inspectorate reference number EN070007]. The objectives of the Project are to reduce CO₂ emissions from industry and support economic growth in north Wales and the north west of England.
- 1.1.10. Power supply from the onshore grid and upgraded telecommunications are required at the New Douglas Offshore Platform (OP) in Liverpool Bay, which will receive and distribute CO₂ to the storage sites. This will require a combined electrical and fibre optic cable connection, as part of the Marine element of the Project, to be installed between the PoA Terminal, from the MHWS, and the Offshore New Douglas OP.
- 1.1.11. The Proposed Development is classified as a "major development" according to Article 2 of the Town and Country Planning (Development Management Procedure) (Wales) Order 2012, as the Proposed Development will be conducted on a site of one hectare or more. Therefore, the Proposed Development requires the submission of a full planning application pursuant to the TCPA 1990 (as amended), and the Applicant has adhered to the PAC requirements outlined in the Planning (Wales) Act 2015.

ABOUT THIS DOCUMENT

- 1.1.12. The purpose of this PAC Report is to outline the activities that took place to support the statutory PAC, present the feedback received from stakeholders, and demonstrate how the feedback has been considered in refining the Proposed Development.
- 1.1.13. This PAC Report presents the consultation activities undertaken before and during the statutory PAC period, which took place from 16 June to 14 July 2025.

- 1.1.14. The feedback received has been collated and summarised in this PAC Report along with LBCCS' responses to issues raised.

PURPOSE OF CONSULTATION

- 1.1.15. The purpose of the consultation activities was to inform stakeholders of the Proposed Development and receive feedback which would be used to improve the robustness of the planning application.
- 1.1.16. Consultation activities were organised to meet the requirements of the Planning (Wales) Act 2015, which prescribes statutory PAC activities and forms of publicity.

THE PROPOSED DEVELOPMENT

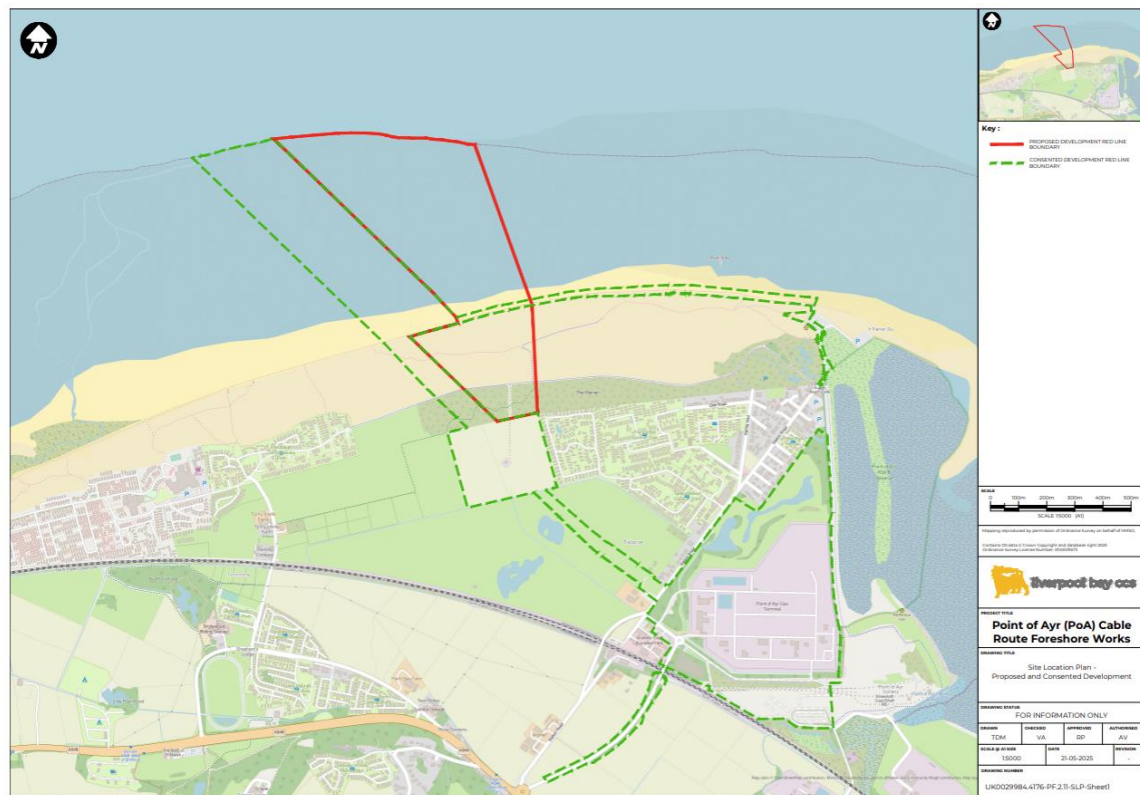
- 1.1.17. The main elements of the Proposed Development are:
- Construction of part of a cable conduit under the Gronant Dunes using a trenchless HDD method of installation.
 - An HDD Exit Pit accompanied by the installation of a temporary steel container – known as a sump – that will capture any drilling fluid emitted from the drilling process. This will be approximately 3m below beach level, roughly 3m x 3m in width and length and will have a capacity of around 10m³. This includes the reinstatement of the HDD Exit Pit beach area on completion.
 - The installation of a combined electrical and fibre-optic cable within the HDD conduit.
 - At the inter-tidal area (Talacre Beach), the cable will be buried with a plough and/or cable trencher. The cable has a target burial depth of 2.5m from the HDD Exit Pit across Talacre Beach to the MLWS line.
- 1.1.18. There are no other above or below ground structures proposed as a part of the Proposed Development.
- 1.1.19. The construction and operation of the cables from MHWS, and beyond the MLWS through the marine environment is covered by the separate Marine Licence [application reference: CML2365] approved in May 2025 by NRW.
- 1.1.20. The realigned route of the foreshore cables is contained within the Red Line Boundary (RLB) for this planning application to the north-west of the HDD Entry Pit, as shown in the Proposed Site Plan [drawing reference: UK0029984.4176-PF.2.9-LAY-Sheet1] in Figure 1.1, passing under the Gronant Dune system, until it reaches the MLWS.

Figure 1.1 - The realigned route of the cables contained within the RLB for the Proposed Development



- 1.1.21. The RLB for the cable route of the Proposed Development has been refined based on feedback received from the Port of Mostyn on the original ML [CML2365]. This realignment is designed to reduce the impact on vessel movements in and out of the Port of Mostyn. Figure 1.2 shows the RLB consented under planning permission FUL/000246/23 (Green Dotted Line) in relation to the Proposed Development RLB (Red Line).

Figure 1.2 - RLB of the Proposed Development and Consented Development



- 1.1.22. The new cable alignment offers several advantages compared with the previous alignment, including:
- 1.1.23. **Minimised ecological impact:** the realignment does not introduce new or additional significant environmental effects and has a slightly smaller seabed footprint in the inter-tidal and sub-tidal areas, due to a more direct, straight route.
- 1.1.24. **Environmental advantages:** the realigned cable laying, construction plant, equipment area and repositioning of the HDD Exit Pit will be an additional 250m away from the Little Tern colony at Gronant Dunes, reducing potential disturbance during the breeding season. The cable will also be routed through an area with lower Tern foraging distribution and activity (<1.5%).
- 1.1.25. **Regulatory compliance:** the realignment remains compliant with the Habitats Regulations Assessment (HRA) and Water Framework Directive (WfD), with no additional adverse effects on designated sites or water quality.
- 1.1.26. **Improved stakeholder coordination and reduced disturbance to Port of Mostyn:** the realignment decreases impact on channel traffic as fewer

support vessel movements are required due to the reduced complexity of anchor movements. There will also be collaborative planning in place to avoid conflicts with port operations.

- 1.1.27. **Operational efficiencies:** Simpler cable installation and faster lay operation across channel avoids complicated, time consuming, sinuous manoeuvre of the cable lay vessel (CLV) on anchors within the Welsh Channel. Vessel time in channel will also be reduced due to shorter pull operation.

PREVIOUS APPLICATIONS

TCPA application in 2022

- 1.1.28. In support of the Consented Development, the Applicant's engagement team undertook statutory consultation activity between 7 November and 5 December 2022. The consultation was largely carried out through the project website www.hynethub.co.uk. Information about the Consented Development was shared with stakeholders through leaflet drops, site notices, letters, emails, posters and an online, as well as an in-person consultation event.
- 1.1.29. There were 16 responses from the public to the consultation across online and paper formats. From Specialist Consultees, one response was received from NRW surrounding the ecological effects and biodiversity benefits. No responses were received from Community Consultees. The key feedback themes were:
- Impact of the construction period on residents, including traffic management.
 - Environmental management of the Gronant Dunes.
 - Access to Talacre Beach.
 - General comments about the merits and suitability of hydrogen and carbon capture projects.
 - Investments in the community around Talacre.

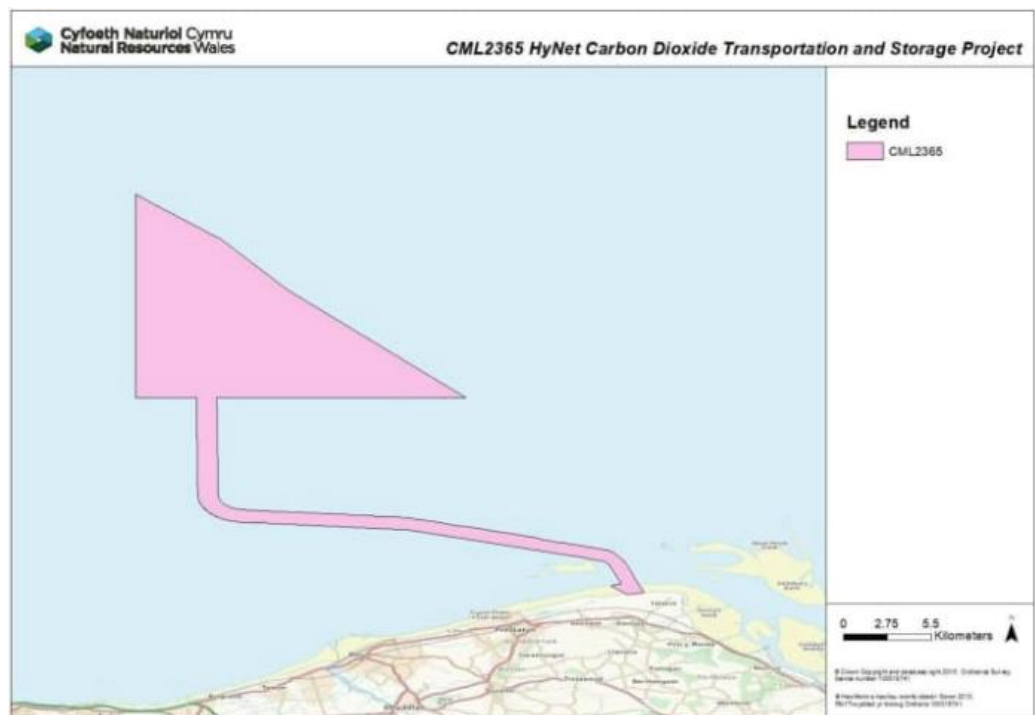
- 1.1.30. The PAC Report for the Consented Development can be referred to on the FCC planning portal under reference number FUL/000246/23.

ML application in 2024

- 1.1.31. A ML application [CML2365] was submitted by LBCCS to NRW-MLT in February 2024. This ML application proposed several marine licensable activities in Welsh Waters, including the installation of a new combined electrical and fibre-optic cable, from the PoA Terminal to the New Douglas OP in Liverpool Bay. These activities were assessed in the supporting Environmental Statement (ES). Two route options were described in the ML application for the landfall and nearshore area.

- 1.1.32. Notices were placed in local newspapers, which invited representations from stakeholders and the public in relation to the ML application. The notices informed interested parties where the ES accompanying the ML application could be viewed for comment.
- 1.1.33. Feedback from stakeholders, notably Port of Mostyn, identified that crossing the Welsh Channel to lay the cable could have implications for vessel movements in and out of the port. LBCCS was therefore requested to explore options to modify the installation method and alignment.
- 1.1.34. NRW-MLT was satisfied with LBCCS' consideration to explore alternative options following the cable realignment put forward in the Proposed Development, which led to an additional 42 days of consultation during the ML review with NRW. This resulted in consent being granted for the ML [CML2365] on 22 May 2025 with pre-construction, construction, and post-construction conditions. The Licensed Area granted under CML2365 is shown in Figure 1.3.

Figure 1.3 - Map of Licensed Area under ML [CML2365]



2. CONTEXT

OVERVIEW

- 2.1.1. To have a fair and accessible PAC for the Proposed Development, best practice and relevant planning legislation was taken into consideration when planning consultation activities. The aims of the PAC activities were to:
- provide accurate information that gives consultees a clear view of what is proposed
 - share information at an early enough stage so that the Proposed Development can still be influenced, while being sufficiently developed to provide detail on what is being proposed
 - be engaging and accessible in style, encouraging consultees to react and offer their views
 - seek comment on the draft planning application documents
 - support and promote the Applicant's purpose and information associated with the Proposed Development and wider Liverpool Bay CCS Project to serve the HyNet Industrial Cluster.

CONSULTATION PRINCIPLES

- 2.1.2. The aims of the consultation were formed to align with principles, such as the Gunning Principles, Welsh language promotion and best practice, to engage with as many stakeholders as possible.

GUNNING PRINCIPLES

- 2.1.3. The Gunning Principles require consultations to meet four requirements:
- proposals are still at a formative stage
 - there is sufficient information to give 'intelligent consideration'
 - there is adequate time for consideration and response
 - 'conscientious consideration' must be given to the consultation responses before a decision is made.

- 2.1.4. By following the legislative requirements for PAC, the Gunning Principles are also adhered to.

WELSH LANGUAGE

- 2.1.5. In line with the Welsh Government's mandate to promote and facilitate the use of the Welsh language, Welsh language materials were produced in line with the PAC and related legislative requirements for Welsh language planning documents.

- 2.1.6. The materials produced in English and Welsh were:

- a site notice
- a statutory notification letter.

2.1.7. Copies of these materials are presented in Annex A and Annex B.

EQUALITY ACT 2010

2.1.8. To ensure stakeholders were informed of the proposals and aware of the opportunity to comment, protected characteristics as described in the Equality Act 2010 were considered.

2.1.9. The protected characteristics are:

- age
- gender reassignment
- being married or in a civil partnership
- being pregnant or on maternity leave
- disability
- race including colour, nationality, ethnic or national origin
- religion or belief
- sex
- sexual orientation.

2.1.10. Local community groups that represent stakeholders with diverse characteristics were contacted at the beginning of the PAC. The full list of local community groups contacted are shown in Annex C.

2.1.11. Consideration has been given as how to best overcome barriers that may prevent people from taking part, shown in Table 2.1:

Table 2.1 – Barriers to taking part in consultation and our mitigation measures

Barrier to taking part	Mitigation
Not hearing about it	The consultation was publicised using a range of channels, including letters, website, site notices, digital and printed newsletters as well as engagement with community council representatives.
Difficulty with written English	The consultation materials were offered to be translated into Welsh, in large print or in Braille upon request. A short Welsh-language statement of this was included on materials to make the facility known. Some consultation materials were published and made available in Welsh (as detailed in paragraph 2.2.5).
Problems in understanding technical language	The consultation materials were written in Plain English, making the language as clear, concise and jargon-free as possible.

Barrier to taking part	Mitigation
Difficulty with accessing computers	The site notice signposted stakeholders to public computers that can be accessed and used free of charge in community deposit points (Holywell Library and Learner's Centre and Prestatyn Library) to view the consultation materials and draft planning application documents online.
Difficulty with digital literacy	A printed copy of the site notice, in both Welsh and English, was made available at Holywell Library and Learner's Centre and at Prestatyn Library. All consultation materials were available in printed form upon request, with a brief Welsh-language statement included on the materials to inform readers of this option. Additionally, the printed Eni community newsletter was distributed to local residences during the final week of the PAC period.

PRE-APPLICATION CONSULTATION REQUIREMENTS

- 2.1.12. The Proposed Development is classified as a "major development" according to Article 2 of the Town and Country Planning (Development Management Procedure) (Wales) Order 2012, as the Proposed Development will be conducted on a site of one hectare or more.
- 2.1.13. Major development refers to developments that meet one or more of:
- housing developments of 10 or more dwellings or where the site area of 0.5 ha or more
 - a building(s) where the floorspace exceeds 1,000 sqm
 - winning and working of minerals or the use of land for mineral-working deposits
 - waste development
 - development conducted on a site of one hectare or more.
- 2.1.14. Statutory PAC requirements to support planning applications for major developments in Wales were enacted in August 2016 through the Town and Country Planning (Development Management Procedure) (Wales) (Amendment) Order 2016 (DMPWO). The Applicant has adhered to PAC requirements as prescribed in the DMPWO, section 17 of the Planning (Wales) Act 2015 (the Act), and section 61Z of the Town and Country Planning Act 1990 – as amended (TCPA).
- 2.1.15. Prior to the submission of the planning application, the following requirements must be met to comply with Articles 2C, 2D and 2F, of the DMPWO:

- publicise the proposed application by displaying a site notice in at least one place on or near the land to which the proposed application relates for not less than 28 days
- write to any owner or occupier of any land adjoining the land to which the proposed application relates
- make the draft planning application and supporting information available for inspection at a location in the vicinity of the proposed development for not less than 28 days beginning with the day which each of the notices are given
- consult Community and Specialist Consultees, giving notice of the proposed application in writing and for Specialist Consultees enclose the draft planning application documents or provide a link to a website where the documents can be found
- submit a PAC Report as part of the planning application.

2.1.16. Specialist Consultees were identified in accordance with Schedule 4 of the DMPWO.

2.1.17. In accordance with Article 2F of the DMPWO, the PAC Report includes contents as outlined in Table 2.2:

Table 2.2 – PAC Report contents

Minimum requirement	Report reference
A copy of the site notice	Annex A
A declaration that the site notice was displayed in accordance with the requirements in article 2C	Section 4
List of the addresses of owners and occupiers of adjacent land who were given notice of the proposed application	Section 3
Copies of notices given to owners and occupiers of adjacent land	Annex B
Copies of notices given to Community Consultees and Specialist Consultees	Annex D and Annex E
A summary of all issues raised in response to the notification of the proposed application	Section 5
Confirmation of whether the issues raised have been addressed and if so, how	Section 5
Copies of all responses received from Specialist Consultees with an explanation of the account taken of each response	Annex J and Section 5

2.1.18. A guidance note¹, published by Welsh Government, has also been used as a baseline to inform consultation activities and identify consultees.

¹ Welsh Government (2021). 'Pre-application Community Consultation: Best Practice Guidance for Developers', available at: <https://www.gov.wales/sites/default/files/publications/2021-12/planning-major-developments-guidance-on-pre-application-consultation.pdf>

3. CONSULTEES

OVERVIEW

- 3.1.1. To comply with the DMPWO, the TCPA and the Act, consultees were identified and given notice of the Proposed Development and statutory PAC.

SPECIALIST CONSULTTEES

- 3.1.2. Table 3.1 lists the relevant Specialist Consultees for the application for the Proposed Development in accordance with Schedule 4 of the DMPWO.

Table 3.1 – Specialist Consultees

Organisation
Flintshire County Council – Local Planning Authority
Flintshire County Council - Local Highways Authority
Flintshire County Council - Flood risk Management
Llanasa Community Council
Health & Safety Executive
Health & Safety Executive Wales
Natural Resources Wales
The Canal and River Trust
North Wales Resilience forum
CADW
Dŵr Cymru Welsh Water
Heneb: The Trust for Welsh Archaeology
Police and Crime Commissioner for North Wales

COMMUNITY CONSULTTEES

- 3.1.3. Tables 3.3 to 3.4 list the Community Consultees that were contacted as part of the statutory PAC in accordance with article 2D of the DMPWO. Tables 3.2, 3.5 and 3.6 show the local political stakeholders we included and contacted beyond the Community Consultees that we are required to notify about the PAC.

Table 3.2 – Flintshire County Councillors

Flintshire County Councillors
Leader of the Council – Cllr Dave Hughes
Chair of Planning – Cllr Richard Lloyd
Cabinet Member for Planning and Public Protection – Cllr Chris Bithell
Cabinet Member for Economy, Environment and Climate – Cllr Chris Dolphin

Table 3.3 – Host Ward Members

Host Ward Councillors – Flintshire County Council	Electoral Division
Cllr Gina Maddison	Llanasa and Trelawnyd
Cllr Glyn Banks	Llanasa and Trelawnyd

Table 3.4 – Host Community Council

Host Community Council
Llanasa Community Council

Table 3.5 – Neighbouring County Ward Members

Neighbouring ward Councillors	County Council	Electoral Division
Cllr Chris Dolphin	Flintshire County Council	Whitford
Cllr Pam Banks	Flintshire County Council	Mostyn
Cllr Chris Evans	Denbighshire County Council	Tremeirchion
Cllr David Gwyn Williams	Denbighshire County Council	Dyserth
Cllr Carol Evans	Denbighshire County Council	Prestatyn Meliden
Cllr Julie Matthews	Denbighshire County Council	Prestatyn Meliden
Deputy Mayor Anton Sampson	Denbighshire County Council	Prestatyn East
Cllr Julian Thompson-Hill	Denbighshire County Council	Prestatyn East
Cllr Elen Heaton	Denbighshire County Council	Prestatyn East
Cllr Andrea Tomlin	Denbighshire County Council	Prestatyn East
Cllr Peter Duffy	Denbighshire County Council	Prestatyn Central
Cllr Tina Jones MBE	Denbighshire County Council	Prestatyn Central
Cllr Jon Harland	Denbighshire County Council	Prestatyn Central
Cllr Ben Williams	Denbighshire County Council	Prestatyn Central

Table 3.6 – Neighbouring Community Councils

Neighbouring Community Councils
Prestatyn Town Council

Neighbouring Community Councils
Whitford Community Council
Trelawnyd and Gwaenysgor Community Council
Mostyn Community Council

HOST AND ADJOINING OWNERS AND OCCUPIERS

- 3.1.4. Host and adjoining owners and occupiers were sent a Schedule 1B notification of the PAC in line with Article 2C of the DMPWO. Table 3.7 and Table 3.8 list the addresses of the host and adjoining owners and occupiers of land holdings along the route of the Proposed Development.

Table 3.7 – Host landowners and occupiers

Host landowner addresses
Eni UK Limited, Eni House, 10 Ebury Bridge Road, London, SW1W 8PZ
The Crown Estate Commissioners, 1 St. James's Market, London SW1Y 4AH
Natural Resources Wales, Chester Road, Buckley, Flintshire, CH7 3AJ
Sustrans, 2 Cathedral Square, Bristol, BS1 5DD

Table 3.8 – Adjoining owners and occupiers

Adjoining landowner addresses
Butterfield Bank (Guernsey) Limited, P.O. Box 25 Regency Court, Gategny Esplanade, St Peter Port, Guernsey, GY1 3AP
Darwin West, Country (Guernsey) Limited, 11 New Street, St Peter Port, Guernsey, GY1 4HP
Darwin Property Investment Management Ltd, Empire House, 175 Piccadilly, London W1J 9TB
Eni House, 10 Ebury Bridge Road, London, SW1W 8PZ
Haven Leisure Limited, No 1 Park Lane, Hemel Hempstead, Hertfordshire, HP2 4YL
Lyons Holiday Park Limited C/O Champion Allwoods Limited, 2nd Floor, Refuge House, 33-37 Watergate Row, Chester, Cheshire, CH1 2LE
Darwin (North West) Limited, Talacre Beach Caravan Park, Station Road, Talacre, Holywell, Clwyd, CH8 9RD
Natural Resources Wales, Chester Road, Buckley, Flintshire, CH7 3AJ
Warren Farm, Station Road, Talacre, Holywell, CH8 9RD

LOCAL COMMUNITIES

- 3.1.5. Local community groups and businesses in Talacre and were also contacted as part of the statutory PAC. A full list of these organisations is included in Annex C.

WIDER STAKEHOLDERS

- 3.1.6. Table 3.9 lists the non-statutory stakeholders that were contacted as part of the statutory PAC. These include host Members of Parliament (MPs), and relevant regional and constituency Members of the Senedd (MSs).

Table 3.9 – National political stakeholders

Members of Parliament and Members of the Senedd	Role
Becky Gittins MP	Member of Parliament for Clwyd East
Hannah Blythyn MS	Constituency Member of the Senedd - Deyln
Llyr Gruffydd MS	Regional Members of Senedd - North Wales
Mark Isherwood MS	Regional Members of Senedd - North Wales
Sam Rowlands MS	Regional Members of Senedd - North Wales
Carolyn Thomas MS	Regional Members of Senedd - North Wales

4. PRE-APPLICATION CONSULTATION APPROACH

OVERVIEW

- 4.1.1. The statutory PAC took place from 9am on Monday 16 June until 11:59pm on Monday 14 July 2025.
- 4.1.2. A range of communications were used to advertise the statutory PAC to ensure stakeholders were aware of the consultation period and the channels available for feedback.
- 4.1.3. Stakeholders were able to respond by:
- email via the project email address: hello@hynethub.co.uk.
 - post via the project freepost: FREEPOST LBCCS.

CONSULTATION MATERIALS

- 4.1.4. In compliance with the statutory requirements for consultation under Article 2C of the DMPWO, the following documents were produced and presented for the PAC on the project website:
- Draft Article 10 Notice and Notice Letter
 - Draft Planning, Design and Access Statement (PDAS)
 - Draft planning submission documents - cover letter and planning application form
 - Draft HRA Stage 1 and 2
 - Water Framework Directive (WfD) Assessment
 - Draft Site Location Plan: Proposed and Consented Development
 - Draft Site Location Plan
 - Existing Site Plan
 - Proposed Site Plan.
 - Draft Net Benefit for Biodiversity (NBB) and Green Infrastructure Statement
 - Environmental Studies Report – Culture Heritage, Biodiversity and Arboriculture
 - Draft Construction Environmental Management Plan (CEMP).
- 4.1.5. Consultation materials were produced to explain the Proposed Development in non-technical language and elicit feedback from stakeholders. They were available to view and download on the project website. Pictures of these materials are included in Annex A, Annex B, Annex G and Annex H. These comprised:
- FAQs
 - Webpage
 - Site notices

- Statutory notification letter (in English and Welsh)
- Stakeholder email (in English and Welsh).

4.1.6. The FAQs were updated in line with frequently asked questions identified through presenting at the Llanasa Community Council meeting, and the monitoring of social media and the project inbox. Screenshots of the updated FAQs are shown in Annex G.

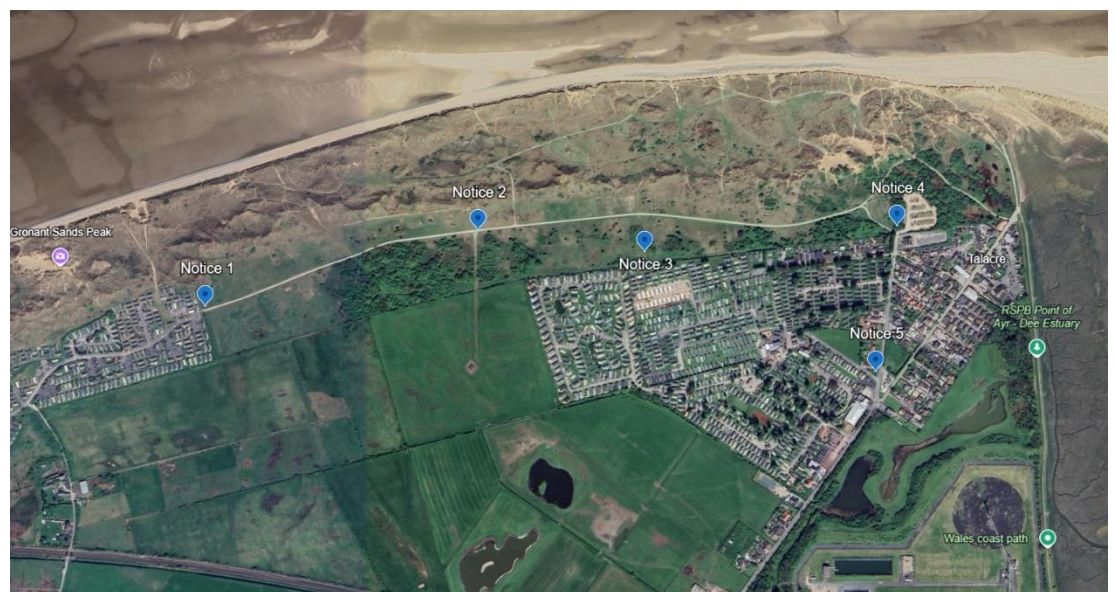
4.1.7. The consultation materials were also available in Welsh, large print, hard copy, Braille or other languages upon request. A short English and Welsh-language statement communicating this was included on the project website.

CONSULTATION NOTIFICATION AND PROMOTION

NOTIFICATION LETTERS AND EMAILS

4.1.8. In accordance with Article 2C of the DMPWO, a site notice and notification of PAC were printed and displayed along key points of the Proposed Development route, shown in Figure 4.1. The notices were first displayed on 13 June 2025 and checked weekly until 14 July 2025, to ensure they were still displayed and visible. Pictures and dates of the posted site notices and when they were checked are in Annex A.

Figure 4.1 – Location plan for site notices



4.1.9. A printed copy of the site notice (in Welsh and English) was deposited in Holywell Library and Learner's Centre and Prestatyn Library during the second week of the consultation.

4.1.10. Stakeholders were notified of the statutory PAC by email, sent on Monday 16 June 2025. Three different emails were sent:

- An update email about the Proposed Development and the statutory PAC, with the site notice attached, was sent to Community

Consultees, including local Flintshire County Council members and Llanasa Community Council members. A screenshot of the email is in Annex D.

- An email with the notification of PAC and site notice attached was sent to Specialist Consultees. A screenshot of the email is in Annex E.
- An update email about the Proposed Development and the statutory PAC explaining the Proposed Development, with the site notice attached, was sent to local community groups. A screenshot of the email is in Annex F.

4.1.11. The notification of PAC and a copy of the site notice were sent as letters to host and neighbouring landowners. Screenshots of the site notices and statutory notification letters can be seen in Annex A and Annex B.

4.1.12. The Applicant attended and presented at a Llanasa Community Council meeting on Tuesday 24 June to provide an overview of the proposals and the planning application process, introduce the plans for the upcoming consultation period and give an opportunity for council members to ask questions regarding the Proposed Development. Llanasa Community Council was encouraged to share the information through its channels. Screenshots of the presentation slides can be seen in Annex I.

NEWSLETTERS

4.1.13. To promote the launch of the PAC, an edition of the HyNet e-newsletter was emailed to a mailing list of 483 subscribers. Information about the Proposed Development, the consultation dates, how to provide feedback and where to find further information was included. See a screenshot of the newsletter article in Annex I.

4.1.14. On the final week of the PAC, the printed Eni community newsletter was hand delivered to 300 local residences. An article with information on the Proposed Development was included as one of the articles to serve as a reminder to submit feedback before the PAC closed. A photo of the newsletter can be viewed in Annex I.

PROJECT WEBSITE

4.1.15. Webpages dedicated to the Proposed Development (hynethub.co.uk/poa) were used to promote and host materials during the PAC. Screenshots of the project website are in Annex H.

4.1.16. The 'Point of Ayr' webpage dedicated to the Proposed Development went live on Friday 13 June 2025. This was slightly ahead of the PAC launch date of Monday 16 June so that the information was available for landowners and adjoining occupiers when they received their statutory notification letters.

4.1.17. From Friday 13 June to Sunday 15 June 2025, there were 74 visits to the Point of Ayr pages of the project website. From Monday 16 June to

Sunday 22 June 2025, the Point of Ayr page recorded 446 visits, which is six times more than the number of visits in the previous week.

- 4.1.18. Throughout the PAC period, from Monday 16 June to Monday 14 July, there were 1,148 total visits to the Point of Ayr pages of the project website, with the Point of Ayr homepage being the most popular amongst visitors, followed by the interactive map and the 'Proposed Development' webpage.

ANALYSIS METHODOLOGY

- 4.1.19. A total of nine pieces of feedback were received by email: three responses were from members of the public, and six responses were from Specialist or technical consultees.
- 4.1.20. Responses were thematically categorised, and the issues raised from the feedback were identified. The issues raised and the Applicant's responses are presented in Section 5: Feedback Received.
- 4.1.21. In addition to the PAC requirements, the Applicant has been engaging with FCC and NRW throughout the pre-application period. FCC has provided pre-application advice which the Applicant has considered when preparing the planning application.

5. FEEDBACK RECEIVED

OVERVIEW

- 5.1.1. Comments received on the Proposed Development were analysed and categorised based on the issues raised and the classification of the consultee in accordance with Articles 2C, 2D and Schedule 4 of the DMPWO.
- 5.1.2. Nine responses were received to the PAC – six from Specialist and technical consultees and three from members of the public, shown in Table 5.2 and Table 5.4 respectively. Screenshots of the responses can also be viewed in Annex J and Annex K respectively.
- 5.1.3. Key topics and concerns raised by council members during the Llanasa Community Council meeting in response to the presentation given by the Applicant about the Proposed Development can be seen in Table 5.3.
- 5.1.4. The main themes, issues raised, and the Applicant's response to these issues are presented based on the consultee groupings.

SUMMARY OF RESULTS

- 5.1.5. A summary of the themes raised in response to the PAC are presented in Table 5.1. These themes and main points are expanded in the tables that follow, which include the Applicant's response.

Table 5.1 – Themes from responses to the PAC

Themes	Issues
General	Request regarding the capacity and nature of the natural gas reservoirs.
Traffic and transport	Concern about HGV movements during construction and operation.
Construction impacts	Concern about noise and vibration during construction. Concern about impact on parking and access to Talacre Beach.
Economic impacts	Concern that construction will decrease tourism upon which local businesses rely.
Environmental impacts	Concern that construction will disturb Protected Species including Natterjack toads and Little Terns. Concern that drilling will damage and excavate Gronant Dunes, reducing flood defences. Concern that drilling fluid will leak onto Talacre Beach. Concern that the Proposed Development is sited within a flood zone.

Themes	Issues
	Concern that the Proposed Development could impact Protected Sites including the Gronant Dunes and Talacre Warren Site of Special Scientific Interest (SSSI) and the Dee Estuary Ramsar site.
Public Rights of Way (PRoW)	Request for further information on impact of construction and mitigation measures for cycle routes.
Historic environment	Request for archaeological monitoring and recording. Request submission of a Written Scheme of Investigation (WSI).
Community benefits	Request for further information about the potential for apprenticeships, use of local suppliers and a Community Benefit Fund. Concern that the Proposed Development will only lead to a low-cost and renewable energy supply for those other than local residents.

THE APPLICANT'S RESPONSE TO ISSUES RAISED

- 5.1.6. The issues raised from the responses to the PAC and how the Applicant has addressed these issues are presented in Tables 5.2, 5.3 and 5.4.

Table 5.2 – Issues raised by Specialist Consultees by topic

Consultee	Issue Raised	Applicant's response
Traffic and transport		
Flintshire County Council Highways	No objection. Access to the temporary construction compound and works has been granted under FUL/000246/23 and this permission requires the submission of a full Construction Traffic Management Plan and Construction Workers Travel Plan by means of condition.	Noted. The transport management measures relevant to the Proposed Development are presented in the Construction Traffic Management Plan and Construction Workers Travel Plan submitted in respect of the conditions with planning permission FUL/000246/23. The transport management measures relevant to the Proposed Development are also included with the detailed CEMP submitted with this planning application.
Historic Environment		
Heneb	Notes that mitigation for these works was suggested in the Environmental Statement - Chapter 8.10, with which Heneb agreed. Suggests that archaeological monitoring and recording (a watching brief) would be required on the directional drilling access and exit pits, the new cable trench across the beach and on any associated works compound or laydown areas where the topsoil and subsoil are scraped off.	Noted. As agreed with Heneb, the application includes the information from the archaeological assessments completed to date.
Heneb	Considers that no development shall take place within the application area until the applicant has secured the implementation of a programme of archaeological work in accordance with a WSI, which has been submitted by the applicant and approved in writing by the Planning Authority.	Noted. A draft WSI was shared with Heneb in July for consultation prior to submitting the planning application. Following feedback received from Heneb, a final WSI has been submitted with this planning application.

Consultee	Issue Raised	Applicant's response
Cadw	No objection. The Environmental Studies Report concludes that the Proposed Development will have a similar impact on the settings of the attached designated historic assets as the original proposals and therefore they will not be significant, with which Cadw concurs. The walkover survey carried out for this report identified a number of non-designated archaeological features in the Proposed Development area and proposed a number of mitigation measures. These measures appear to be appropriate. Request that the advice of Heneb is sought on these matters.	Noted. Heneb has been consulted.
Ecology		
Natural Resources Wales (NRW)	NRW is content that the proposed changes to the cable route and foreshore works will not result in changes to the effects previously described in the 'shadow' HRA for any designated benthic features providing all of the mitigation previously agreed is adhered to; this is in particular reference to advice that NRW provided for both the original planning application [dated 23/08/2025, application reference FUL/000246/23] and the Marine Licence [CML2365]. To secure the mitigation measures, NRW advises that a detailed CEMP, to be submitted and approved in writing by the Local Planning Authority prior to commencement of works, is secured via a suitably worded condition. NRW also advise that provisions of the CEMP include evidencing compliance.	Noted. A detailed CEMP has been submitted with this planning application.

Consultee	Issue Raised	Applicant's response
	Provided the development is carried out in accordance with that condition, NRW do not consider that it will adversely affect the integrity of the (Special Area of Conservation (SAC) / (Special Protected Area (SPA) / Ramsar site.	
Natural Resources Wales	NRW notes that the Environmental Studies Report (dated 11/06/25) acknowledges that the shift of the previously approved cable works eastwards brings the HDD beneath the dune slacks with potential to impact upon the hydrology of this area. The report states that a 'given the depth and small diameter of the cable/conduit proposed, any impact is likely to be minimal and localised in extent'. NRW advises that robust justification should be provided to support the above statement and confirm the extent of any potential adverse effect on the dune slacks and its hydrology. This information will be needed by the Local Planning Authority when undertaking their HRA to ensure that it will not adversely affect the integrity of the SAC.	The HDD method is a closed, pressurised system designed to avoid surface disturbance, with drilling fluid (water, and bentonite clay) contained and recovered via a sump at the Exit Pit. The cable works will be situated within the superficial deposits and will not be situated within the underlying impermeable coal measures bedrock (Pennine Lower and Middle Coal Measures Formations). The dune slack system is underlain by two distinct superficial deposits: the Blown Sand Formation (STOB) and the Beach and Tidal Flat Deposits (BSA). The STOB unit comprises well-sorted, highly permeable aeolian sands that support perched water tables, fed by rainfall and local runoff. Geotechnical boreholes drilled at the Entry Pit, in the dunes, and at the Exit Pit, encountered groundwater between 0.5-1.2m depth. The main contributors to the water level in the dunes and slacks are pluvial and inlands sources, although some tidal influence can be expected. During construction, one of the key principles to the installation of a successful HDD conduit is the careful management of drilling fluid pressures to prevent water ingress. Furthermore, once the conduit is drilled, the HDD conduit is sleeved by watertight glass reinforced

Consultee	Issue Raised	Applicant's response
		plastic (GRP) pipework to prevent further water ingress and maintain the integrity of the conduit, and electrical cable. The relatively narrow diameter (around 450mm) HDD conduit, while beneath the water table, is considered unlikely to: • create a barrier to groundwater flow; • create a preferential flow pathway for groundwater; or • affect groundwater levels. Groundwater is expected to flow around the conduit. Therefore, considering the above, there is no significant effect anticipated on the hydrology of the dune slacks from the presence of the HDD conduit.
Natural Resources Wales	NRW notes a Biosecurity Risk Assessment is to be produced and implemented (section 5.6.3 of the Environmental Studies Report) and advises the Local Planning Authority to secure a condition to any planning permission granted. Condition: No development, including site clearance, shall commence until a Biosecurity Risk Assessment, and Method Statement that considers invasive non-native species and specific diseases (such as the amphibian fungus Chytrid) has been submitted to and approved in writing by the Local Planning Authority. The risk assessment shall include measures to prevent the introduction of and where present control, removal or for the long-	The onshore plant and equipment and the offshore vessels are highly unlikely to be a source of the amphibian fungus Chytrid. All plant and equipment, and vessels will be thoroughly cleaned, in accordance with national and international protocols, prior to their mobilisation to site. The Applicant recognises the importance of preventing the introduction and spread of this amphibian fungus. Especially given that the native UK populations of Natterjack toad that have been tested, have returned positive for the fungi Batrachochytrium dendrobatidis ("Bd"), but are apparently unaffected.

Consultee	Issue Raised	Applicant's response
	term management of invasive species both during construction and operation. The risk assessment shall consider landscaping and other related plans. The Biosecurity Risk Assessment shall be carried out in accordance with the approved details. Justification: To ensure that an approved Biosecurity Risk Assessment is implemented to secure measures to prevent or control the spread and effective management of any invasive non-native species and listed diseases at the site. The approved Biosecurity Risk Assessment should be included within the detailed CEMP.	The Applicant acknowledges the request for a planning condition requiring the inclusion of a Biosecurity Risk Assessment within the CEMP. A detailed CEMP has been submitted alongside the full planning application which includes the measures to address the Biosecurity Risk Assessment and Method Statement requirements. As such, the Applicant considers that a separate planning condition requiring the approval and discharge of the Biosecurity Risk Assessment and Method Statement as a separate document is not necessary.
Natural Resources Wales	NRW notes that paragraph 6.2.17 of the shadow HRA identifies no direct or indirect impact to Natterjack toad "as the cables are laid >2.5 m below the surface, avoiding direct disturbance to the land". However, page 49 (paragraph d) of the same document states that "the cables are laid approximately 1 m below the surface". The planning application will therefore need to confirm the depth at which the cables will be laid beneath the surface. As the competent authority under the Conservation of Habitats and Species Regulations 2017, the Local Planning Authority must, before deciding to give consent for a project which is likely to have a significant effect on a SAC / SPA / Ramsar site, either alone or in combination with other plans or projects, make an appropriate assessment of the implications of the project for that site in	The Applicant can confirm that the target depth for the laying of the cables will be of at least 2.5m below the surface and that this discrepancy has been rectified in the HRA. The installation technique is not linear. There are two installations methods required for the cable; that across the dunes and beyond, on the inter-tidal area. Target depth in the inter-tidal area is 2.5m whereas, below the dunes will be much deeper. The trenchless HDD method of construction will be utilised to install a cable conduit under the dunes system. This avoids the creation of an open trench across the dunes and thereby prevents direct impacts to the habitats and protected species. The depth of the conduit will vary relative to ground level, as the dunes fluctuate in height between the crests and slacks, and due to the curve radius of the HDD conduit. The depth of the conduit under the dunes, however, will be >2.5m.

Consultee	Issue Raised	Applicant's response
	view of its conservation objectives. They must for the purposes of the assessment consult NRW and have regard to any representations we make within such reasonable time as is specified. In the absence of that assessment, NRW cannot advise that the proposals would not result in an adverse effect upon the SAC / SPA / Ramsar site.	As included in the extant planning permission, a trenchless method of construction was chosen to avoid direct impacts on the dunes. The depth of the HDD conduit means impacts on protected species within the dunes are not anticipated. This is because Natterjack toads typically burrow to depths of less than 50cm (although can be deeper in winter) and sand lizard burrow to up to 1m deep. Across the inter-tidal area, the cable will be buried with a plough and/or cable trencher, which will self-bury the cable and simultaneously backfill the sliced trench. After a couple of tidal cycles, the beach surface along the cable alignment will return to its original state; as it did following installation of similar cables along this coastline.
Natural Resources Wales	As outlined in the PDAS document (section 8.3.8), the Proposed Development has the potential to directly impact the Gronant Dunes and Talacre Warren SSSI through temporary habitat loss and physical disturbance of SSSI habitat due to the construction of the HDD entry pit. Works associated with the cable installation (including disturbance and noise) may also have an indirect impact on the SSSI and its features. The policy position on the protection of SSSIs is set out in Planning Policy Wales (PPW) sections 6.4.25 - 6.4.27, which states that there is a presumption against all forms of development in a SSSI as a matter of principle, except for developments necessary for the management of a SSSI and minor developments necessary to secure the SSSI's role	The Applicant can confirm that the location of the HDD Exit Pit will be below the MHWS line (and beyond the dune habitat), with its exact location dependant on the detailed design and bend tolerance of the conduit pipes. The location of the HDD Entry Pit does not form part of this application. Consent for the HDD Entry Pit was granted through the extant planning permission for this site [FUL/000246/23]. The trenchless HDD method was selected to avoid and prevent direct impacts on key features of the designated sites, such as the dune system, and habitats for Natterjack toads and sand lizards. To facilitate the HDD process, an Entry/Exit Pit is necessary. Unfortunately, it is not possible to avoid locating the Exit Pit within the SSSI, as all the land between the PoA Terminal and the low water mark is covered by this

Consultee	Issue Raised	Applicant's response
	as a living landscape. Therefore, in the first instance should a development proposal of this nature be submitted to the Local Planning Authority, NRW would advise them that a key issue for consideration is whether the location of the development (within a SSSI) can be justified in accordance with national policy. NRW notes the extant planning permission for this site [FUL/000246/23] and that this would be a separate, yet supplementary, application to implement changes to the previous planning permission. This would therefore be a relevant consideration for the Local Planning Authority. Providing the impact pathways referenced above and within the shadow HRA for the Dee Estuary SAC and SPA are adequately addressed, NRW consider the features of the SSSI will also be adequately safeguarded.	designation. Therefore, locating the HDD Entry Pit close to the existing dune valve and pipeline infrastructure was a reasonable compromise to enable a technically feasible HDD installation under the sensitive dune habitat. The SSSI shares a boundary and ecological characteristics with the SAC and Ramsar site. While the HRA explicitly addresses the features of the Ramsar site, SAC, and SPA, it also implicitly covers the potential impacts on the SSSI and outlines relevant mitigation measures. Furthermore, the Environmental Studies Report provides a clear assessment of the impacts on the SSSI and details the mitigation strategies proposed to address them. The overall conclusion is that there would not be any lasting significant effects on the interest features, and conservation objectives of these sites, and integrity would be maintained following completion of these temporary works.
Natural Resources Wales	NRW notes the Net Benefit for Biodiversity and Green Infrastructure Statement (section 9.1.2), recommends measures to be included within any future habitat management plans. NRW acknowledge, as per section 10.1.1, that management agreements are in place (and agreed with NRW) to favourably manage the protected sites in perpetuity, providing a means for the applicant to achieve net benefits for biodiversity. NRW welcome further discussions with the Applicant to provide greater detail and clarity in	The Applicant notes NRW's acknowledgement of the proposed approach to long-term habitat management and the achievement of net benefits for biodiversity, as outlined in the 'Net Benefit for Biodiversity and Green Infrastructure Statement'. The Applicant has included specific habitat and species work programmes that are in addition to the continuing current management practices. These measures involve elm scrub control, skylark breeding population surveys, and sea holly 'seeding' within the dunes.

Consultee	Issue Raised	Applicant's response
	respect of what will be offered in terms of commitments towards specific habitat and species work programmes.	
PROW and cycle routes		
Sustrans	Requests information regarding the provisions being made to keep the National Cycle Network (NCN) route 5 open, as well as the times/dates the NCN may be impacted by construction.	Information regarding the NCN is included in the CEMP (Document Reference PF.3.6). The off-road cycle route (NCN 5 and Wales Coast Path link route) will be intersected by the temporary working area across Gronant Dunes. However, the use of HDD below Gronant Dunes means that the works will not directly interact with NCN 5 and that it will remain open for the duration of the works.
Hydrology		
The Canal and River Trust	No comments to make on the proposed development as it has no impact on waterways owned or managed by the Trust.	Noted.
Natural Resources Wales	NRW notes that the Flood Map for Planning (FMfP) identifies the application site to be at risk of flooding and within Flood Zone 3 (Sea) and partially within a TAN 15 Defended Zone. NRW is unable to provide technical advice on the acceptability of flooding consequences as no Flood Consequences Assessment (FCA) has been submitted. The advice in Section 10 of Technical Advice Note 15: Development, flooding and coastal erosion, dated 2025 (TAN15) paragraph 10.24 is clear: "In zones 2, 3 and TAN 15 defended zone developers must undertake a flood consequences assessment proportionate to the nature and scale	NRW comments are acknowledged. The Proposed Development involves installation of a marine electrical cable, essential for supplying electricity from the onshore grid to offshore infrastructure, which will be fully buried within a flood risk area (Flood Zone 3), due to operational needs. Avoiding this flood zone is not possible given the cable's intended route. However, as the cable will be buried, it does not alter current or future flood risk levels at the site. Despite recent updates to TAN15 requirements and flood maps, the flood risk associated with the

Consultee	Issue Raised	Applicant's response
	of the proposal. Before granting planning permission, decision makers should be satisfied the scheme is justifiable in accordance with the principles set out in section 8, where they are not satisfied, planning permission should be refused." Therefore, we would advise the Local Planning Authority to request further information regarding this. TAN15 advises that the FCA should be proportionate to the nature and scale of the proposal. NRW advises that developers should refer to all relevant sections of the TAN to determine the scope of the FCA that is required for this particular proposal. Further guidance is also available on the NRW website. NRW notes that this application is solely for the realignment of part of the cable route element of the works previously consented under planning permission FUL/000246/23 and therefore, considering the nature of the works within the redline boundary of the existing permission, a limited FCA is considered appropriate.	development remains unchanged from that assessed in planning permission FUL/000246/23. Therefore, no additional mitigation measures are necessary for the permanent works.
Natural Resources Wales	NRW notes that the Applicant will advise the Construction Contractor to include measures to protect water quality from Horizontal Directional Drilling (HDD) fluids within the detailed CEMP. NRW also notes that at the Exit Pit a 10m³ containment sump will be present to contain spillages of any drilling fluid and a plant-friendly alternative to bentonite would be used during HDD.	There will be no interaction between the construction works for the Proposed Development and nearby watercourses. Despite this, construction pollution prevention methods are described in the detailed CEMP submitted with the planning application, including the process for decommissioning any temporary containment sumps.

Consultee	Issue Raised	Applicant's response
	HDD fluids should be managed to ensure that there is no potential for interaction with watercourses. Measures to achieve this, and pollution prevention methods for other construction sources should be described in the detailed CEMP, including the process for decommissioning any temporary containment sumps.	
Natural Resources Wales	The application site lies partially on Secondary A designated bedrock. NRW notes the Environmental Studies Report states (section 5.7.4): "One possible consequence of the cable's shift eastwards is that it now brings the HDD directly beneath the dune slacks, which may impact upon hydrology within this area and the species this habitat supports. However, given the small diameter of the cable/conduit proposed, any impact is likely to be minimal and localised in extent." The CEMP (section 6.3.1) notes that the Lead Local Flood Authority advised that the groundwater table is likely to be high at this location. NRW therefore reiterates its advice for the previous application [dated 23/08/23, permission FUL/000246/23] in that it would wish to be consulted on the Groundwater Management and Monitoring Plan, which would be implemented alongside the detailed CEMP, to be secured by condition attached to any planning permission granted. The proposed Groundwater Management and Monitoring Plan (GWMMP) should be	The Applicant acknowledges and appreciates the advice received from NRW and has incorporated it into the CEMP. This includes the inclusion of groundwater management and monitoring measures. These measures include information on the pre-construction baseline, groundwater control during drilling, groundwater and environmental monitoring, contingency and response planning, and post-drilling restoration. The Applicant can confirm that the location of the HDD Exit Pit will be below the MHWS line (and beyond the dune habitat). Its precise location will be confirmed by the detailed design and bend tolerance of the conduit pipe and electrical cable.

Consultee	Issue Raised	Applicant's response
	informed by the detailed CEMP and include consideration of the following: Drilling Fluid Escape (Inadvertent Return or "Frac-out") • Risk: Bentonite drilling fluids can escape into the dune matrix or groundwater if pressurised fluid finds a natural fissure or weak layer. • Potential issues: Dunes often have permeable, sandy substrates, increasing the risk of escape; and fluids can smother vegetation or alter subsurface hydrology, affecting delicate root systems and species adapted to dry, low-nutrient soils. • Potential mitigation: Perform a Frac-out Risk Assessment; conduct geotechnical boreholes to assess subsurface risk of frac-out; use real-time pressure monitoring and frac-out contingency plans (containment plus clean-up crews on stand-by); and post construction monitoring of fluid contamination or residual impacts. Impact from Cofferd Dam and Pit Dewatering • Risk: A 20m x 20m coffer dam and a 3m x 3m Exit Pit represent substantial excavation within a proximity to a dune system, even if temporary. (NRW note the indicative location of the Exit Pit on the proposed site plan	

Consultee	Issue Raised	Applicant's response
	[DWG NO. UK0029984.4176-PF.2.9-LAY-Sheet]] differs to the location shown within the CEMP and advise this detail is clarified). • Potential issues: Disturbance of stabilised dune vegetation leading to increased erosion risk; changes to groundwater levels if water is pumped from the pit of the coffer dam; possible introduction of non-native materials or contamination. • Potential Mitigation: Locate the pit in an area of lowest ecological value, with expert habitat mapping support; use sheet piles or sacrificial mats to limit surface area affected; and ensure dewatering discharge is controlled and filtered before entering adjacent land or waterbodies. NRW advises that a detailed CEMP is provided that includes information on how the potential risks outlined above will be managed and mitigated. The CEMP should include elements of the GWMMP and clarify how drilling fluid loss would be tracked, managed and reported as well as a detailed method statement and environmental risk register from the contractor.	
Natural Resources Wales	NRW notes the proposed changes to the cable route would not impact the conclusions of the original Water Framework Directive compliance assessment submitted for planning permission	Noted.

Consultee	Issue Raised	Applicant's response
	FUL/000246/23 (the Consented Development) and therefore has no further comment on this aspect.	
Protected species		
Natural Resources Wales	NRW notes that the cable laying route has moved eastwards from the original application by approximately 250m and that the information provided states that this is now in an area with lower numbers of foraging Little Tern (PDAS, section 6.4.1), which are a qualifying feature of the Dee Estuary SPA (and the adjacent Liverpool Bay SPA). Whilst NRW welcomes this, the route is still within the limited foraging range of Little Tern and therefore NRW's previous advice for the original planning application at this site [letter dated 23/08/23, permission FUL/000246/23] regarding timing of the construction works still applies. NRW notes that the CEMP confirms the installation of the HDD Exit pit on Talacre Beach is to be carried out during February and March 2026 (outside Little Tern breeding season). However, the CEMP shows the indicative works programme for cable installation to be carried out from early July 2026. Figures 4.5 and 4.7 of the CEMP suggest that breeding Little Tern should be a consideration until mid-July. As previously advised, recent Little Tern colony reports suggest there is still significant	New figures within the submitted CEMP summarise the activities for the installation of the electrical cable on Talacre Beach and are showing the lay cable shore pull in for around two days after the nesting period season around the end of July. However, there is an additional ~250m shift away from the foraging and nesting areas of the identified sensitive Little Tern colony (~2,250m in total) arising from the Realigned Route across Talacre Beach and Welsh Channel that will be routing through an area of lower foraging distribution (<1.5%). Ecological surveys carried out from 2023 through to 2025 have been used as a basis for planning of specific activities. Activities are being timed to reduce impacts on ecological receptors as far as practicable. A CEMP has been produced by the contractor for approval prior to commencement of work that demonstrates how impacts on birds will be avoided as far as practicable during the works. This includes planning of the time and duration of activities, toolbox talks for site contractors, provision of a solid hoarding around the Entry Pit works, and appropriate selection of plant machinery to minimise disturbance.

Consultee	Issue Raised	Applicant's response
	breeding activity towards the end of the breeding season, particularly in July (e.g. Andrews, Case & Lewis, 2022; Smith et al 2023). Therefore, NRW reiterates advice (also included within the Marine Licence CM2365) that these works should avoid the Little Tern breeding season and be carried out as far into August and September as possible. If construction works are to be undertaken between April and July inclusive, and if there is any habitat with the potential to be used for nesting Little Terns within 300m of the development, the Ecological Clerk of Works (EcoW) should check for Little Tern breeding activity before any works are undertaken. If nesting Little Tern are present within 300m of the proposed development, no works should be undertaken. NRW notes that a detailed CEMP will be submitted and advises the Local Planning Authority that this should be secured by an appropriate condition attached to any planning permission granted for the proposal. NRW requests to be consulted on the detailed CEMP as part of an application to discharge the condition and agree the timing of the works before they commence.	
Natural Resources Wales	NRW concurs with section 5.4.29 of the Environmental Studies Report which recognises the presence of dense scrub to the south which provides suitable foraging and potential roosting habitat for bats.	The Applicant notes the request for a planning condition linked to construction-phase lighting in relation to potential impact on bats and other sensitive wildlife. Surveys carried out in the vicinity of the proposed HDD Entry Pit and HDD Exit Pit have found no bat activity

Consultee	Issue Raised	Applicant's response
	Bats and their breeding and resting places are protected under the Conservation of Habitats Species Regulations 2017 (as amended). Where bats are present and a development proposal is likely to contravene the legal protection, they are afforded, the development may only proceed under licence issued by NRW, having satisfied the three tests set out in the Regulations (please also refer to paragraph 6.3.7 of Technical Advice Note 5: Nature Conservation and Planning). For the purposes of providing advice at the planning application stage, NRW's comments are limited to the test relating to "demonstration of no detriment to the maintenance of the favourable conservation status of European protected species". NRW considers that the Environmental Studies Report provides an adequate basis upon which to consider the potential impacts of the scheme on bat species and to inform the decision-making process. Due to the suitable habitat for bats to the south of the site, if lighting is to be used during the construction phase, NRW advises the Local Planning Authority to secure a condition on lighting against any planning permission granted: Prior to commencement of development, full details of lighting shall be submitted to and agreed in writing by the Local Planning Authority. This scheme shall consider existing and proposed	within 1.5km of the works areas. Bat foraging was observed around 1.9km to the southwest of the HDD, potentially associated with confirmed bat roosts in farm buildings on Station Road. Despite this, the Applicant confirms that lighting mitigation measures to address ecological sensitivities, are presented within the detailed CEMP submitted alongside the full planning application. The construction lighting has accounted for the guidance for permanent lighting schemes provided in the Institution of Lighting Guidance Note 08/23: Bats and Artificial Lighting at Night. Figures are included within the CEMP that show the proposed arrangement of the construction lighting. These figures show that lighting is directed towards the tasks being carried out to avoid unnecessary light spill. As such, the Applicant considers that a separate planning condition is not necessary, as the required information and mitigation will be secured through the approved CEMP.

Consultee	Issue Raised	Applicant's response
	lighting together with any spillage originating from internal locations. Details shall include: • An assessment of construction phase lighting in respect of wildlife interests of the site, notably bats. • Details of the siting and type of external lighting and internal light spillage during the construction phase. This shall include plans illustrating the location and type of lighting together with isolux drawings. • Details to demonstrate that light spillage will not affect wildlife sensitive areas. This shall include plans illustrating retained or proposed features planned to be functionally used by bats for foraging / dispersal purposes. The scheme shall accord with the provisions of the Institution of Lighting Guidance Note 08/23: Bats and Artificial Lighting at Night. Lighting shall accord entirely with the details so approved for the duration of the construction phase of the development. Justification: A lighting plan should be submitted to ensure lighting details are agreed prior to construction works and to reduce the impacts of lighting in the interest of protected species.	

Consultee	Issue Raised	Applicant's response
Natural Resources Wales	NRW notes the detail provided within the Environmental Studies Report in respect of reptiles and amphibians and that the report outlines the following mitigation (section 5.6.2): "The protected species located within the Gronant Dunes habitats such as sand lizard, Natterjack toad and great crested newt will be avoided by installing the HDD conduit under these dunes". NRW accepts this conclusion in respect of the Natterjack toad, great crested newt and sand lizard, but highlights the need for the Applicant to confirm the depth at which the cables will be laid beneath the surface. In the event of one or more of the great crested newt, Natterjack toad and/or sand lizard being found within 50m of the working area, work must stop and must only commence on receipt of the appropriate licence issued by NRW under the provisions of the Conservation of Habitats and Species Regulations 2017 (as amended). NRW advise that this information should be included within any detailed CEMP produced for the works.	The trenchless HDD method of construction will be utilised to install a cable conduit under the dunes system. This avoids creating an open trench across the dunes and prevents direct impacts to the habitats and protected species. The depth of the conduit will vary relative to ground level, as the dunes fluctuate in height between the crests and slacks, and due to the curve radius of the HDD conduit. The depth of the conduit under the dunes, however, will be >2.5m. As included in the extant planning permission, a trenchless method of construction was chosen to avoid direct impacts on the dunes. The depth of the HDD conduit means impacts on protected species within the dunes are avoided. This is because Natterjack toads typically burrow to depths of less than 50cm (although can be deeper in winter) and sand lizard burrow to up to 1m deep.
Natural Resources Wales	NRW advises that as currently proposed, the works could cause disturbance to Little Terns, which are listed on Schedule 1 of the protected species under the Wildlife and Countryside Act 1981 (as amended); the birds, their nests, eggs and young are fully protected at all times throughout the UK. It is an offence to intentionally or recklessly disturb Little Terns at an active nest site with eggs or young or before eggs are laid, or to disturb the dependent young.	A detailed CEMP has been submitted with this planning application. This includes methods of mitigation for the protection of Schedule 1 birds (Wildlife and Countryside Act 1981, as amended) as well as measures of monitoring. Following consultation feedback during the approval process by NRW for the Marine Licence, the cable alignment and construction timing have been adjusted. The new alignment moves the cable ~250m further

Consultee	Issue Raised	Applicant's response
	NRW advises avoidance measures for disturbance of breeding Little Tern under the Protected Species section (see above). NRW also advises that similar pre-construction checks for the presence of Cetti's warbler (if suitable breeding habitat within 25m of the RLB would be disturbed during their nesting season) should be completed and accompanying mitigation measures for avoiding disturbance to these Schedule 1 species outlined in the detailed CEMP.	from the Little Tern nesting area (2,250m in total) and the busiest foraging zones. This adjustment will reduce the minor disturbances caused by construction on Talacre Beach.
Other		
Natural Resources Wales	NRW notes if further information is prepared to support an application, it may be necessary to change their advice in line with the new information. The advice relates to matters which are included on their consultation topics list. NRW does not rule out the potential for the proposed development to affect other environmental interests that are not included on this list. In addition to planning permission, NRW advises the Applicant to ensure all other permits / consents / licences relevant to the Proposed Development are secured.	Noted.

Table 5.3 – Issues raised by Community Consultees by topic

Issue raised	Applicant's response
Construction impact	
Concern that the construction will restrict access to Talacre Beach.	There will be some impact to the beach. This will be finalised during detailed design and communicated in advance. Temporary diversions will be established where necessary during the construction period for pedestrian use.
Concern about the noise and vibrations from construction and drilling.	Noise and vibration from the cable laying activities, including equipment and vehicular movements, have the potential for short-term impacts, but this will be controlled and kept to a minimum. To manage this, a Noise and Vibration Management assessment has been undertaken for the HDD equipment and foreshore cable installation according to BS 5228-1. Results are displayed in the CEMP. Noise hoarding will be provided around the HDD Entry Pit site, and the works will follow best practice measures and adhere to the British Standard 5228-1:2014 for noise and vibration control, which includes: • Predicting and assessing construction noise levels. • Using quieter or electrically powered plant when possible. • Using noise-compliant equipment and acoustic screens where required. • Limiting noisy activities to core working hours unless agreed with local authorities. The Noise and Vibration Management Plan is detailed in the CEMP, which has been submitted with the planning application. A draft CEMP was available during the PAC on our project website.
Request regarding whether it is known what will be drilled through during construction.	Yes, the Applicant has carried out geotechnical and geophysical surveys for the HDD works. The three boreholes drilled have provided details of the geology under the site, and through which the HDD conduit will be installed.

Issue raised	Applicant's response
Concern about impact of construction on parking.	Parking issues are well known and have been highlighted to the project team. Local knowledge through consultation responses is well received. Access to the Talacre Beach parking area will be maintained.
Community benefits	
Request regarding the community benefits of the Proposed Development, including through apprenticeships, the use of local suppliers and a Community Benefit Fund.	To maximise the benefit to local communities, the Applicant will continue to work with local suppliers where possible. Our procurement processes will consider suppliers with strong environmental, social and governance (ESG) ratings to ensure that the design and construction of the Proposed Development has minimal environmental and community impact. The benefits for the local community include: • Educational experiences for young people • Work experience for those considering their options • Apprenticeships and career opportunities • Community funding for environmental, health and educational initiatives • Volunteering from the project team to help local initiatives A voluntary Community Benefit Fund is being reviewed – more information will be shared when available. Existing community investment projects will continue for the life of the project, including: • Funding DangerPoint centre • Land management around the coastline of Talacre • Provision of Flintshire Coastal Rangers to help manage Gronant Dunes • Delivering Environmental Education Programmes for local schools • Supporting local tourism and conservation. There is some increase to ecological enhancement contributions through the S106 agreement tied to the planning. The S106 agreement was agreed upon under the Consented Development and will continue to apply for the Proposed Development.

Issue raised	Applicant's response
Environmental impacts	
Concern of the impact of construction on Natterjack toads.	The trenchless HDD method of construction will be utilised to install a cable conduit under the dunes system. This avoids creating an open trench across the dunes and prevents direct impacts to the habitats and protected species. The depth of the conduit will vary relative to ground level, as the dunes fluctuate in height between the crests and slacks, and due to the curve radius of the HDD conduit. The depth of the conduit under the dunes, however, will be >2.5m. As included in the extant planning permission, a trenchless method of construction was chosen to avoid direct impacts on the dunes. The depth of the HDD conduit means impacts on protected species within the dunes are avoided. This is because Natterjack toads typically burrow to depths of less than 50cm (although can be deeper in winter) and sand lizard burrow to up to 1m deep.
Concern about damage to Gronant Dunes from drilling and impacting flood defences.	The Applicant will use a method of trenchless drilling technique called HDD to install the cables. HDD allows us to lay cables underground by drilling underneath the sand dunes, instead of digging through them. This technique will avoid the removal of any sand and avoids disturbance to the ground surface, and to the ecologically sensitive dune system. We will be excavating the HDD Exit Pit on the beach, but all the material will be used to backfill the Exit Pit upon completion. The Applicant can confirm that the location of the HDD Exit Pit will be below the MHWS line (and beyond the dune habitat), and there will be no impact on the flood defence characteristics of the dunes.
Concern that drilling fluid will leak onto Talacre Beach.	A temporary steel container called a sump will capture any drilling fluid emitted from the conduit exit. This will be approximately 3m below beach level, roughly 3m x 3m in width and length and will be removed once construction is completed. The Exit Pit for the Gronant dune system HDD on the inter-tidal side will be excavated between 2-3m below ground level, and the excavation will be supported with trench boxes and sheet piles. Groundwater from the excavation will be removed by means of one or more temporary pumps. Based on the

Issue raised	Applicant's response
	predicted tidal heights and location of this pit, the pile height above the beach will be chosen such that ingress of seawater and subsequent washout of drilling fluid during high tide is prevented. Sandbags are placed around the sheet piles to limit scour effect of tide. During the drilling process, any drilling fluid will be contained within the HDD Exit pit and will be either pumped back to the HDD Entry site or transferred by means of agricultural tractor and tanker that will exit the beach from Talacre Beach parking area. It may be necessary to partially clean the drilling fluids at the exit point to prevent the suspended arising (solid materials in the fluid) from blocking the fluid transport equipment. If required, this shall be done with a shaker system. Arisings separated from the drill fluid will be contained before they are returned to the HDD Entry site for proper disposal. The drilling fluid typically consists of a low concentration bentonite – water mixture. Depending on the formation to be drilled through, the concentration is typically between 13 litres (30 kg) and 35 litres (80 kg of 80,000 mg/l). The use of bentonite has several benefits: • It is a natural material. • It is recyclable. • It is on the PLONOR list. Therefore, in the unlikely event that some fluid enters the water, its discharge is not a danger to the environment.
Concern about errors in the drilling process leading to excavation of the dunes.	Performing HDD activity will require monitoring of the fluid pressure within the boreholes by carefully adjusting factors such as viscosity, cuttings suspension, adequate flow rate, and proper tooling for ensuring the success and safety of utility HDD installations and therefore avoiding drilling fluid break out.
Request regarding the availability of the environmental assessments undertaken to date.	These can be viewed on the project website, and on the FCC Planning Portal once the application is validated by the Council.

Table 5.4 – Issues raised by the public by topic

Issue raised	Applicant's response
General	
Concern about the capacity of the natural gas reservoirs to hold significant quantities of CO ₂ in gaseous form.	A programme of monitoring, measurement and evaluation will assess the behaviour and integrity of the CO ₂ throughout its planned 25-year life span. The Applicant anticipates that the stores will be at full capacity with CO ₂ after a period of 25 years. Following this, a 'post-closure' phase of works will take place to end the injection of CO ₂ into the reservoir and ensure that it remains permanently enclosed within it. The post-injection monitoring period performed by the licence operator will be in compliance with legal and regulatory requirements.
Concern that the natural reservoirs were manmade structures.	The gas reservoirs beneath Liverpool Bay are geological structures made from sandstone and have safely trapped natural gas for millions of years. These reservoirs are deep below the surface of the seabed and will be repurposed to store the captured CO ₂ . up to 1km below the seabed and approximately 20 miles offshore. Hundreds of metres of shale lie over the top of these sandstone reservoirs, making an impermeable layer which traps the gas in place. The CO ₂ will be stored in the same way as the original natural gas and will remain safely contained in the sandstone reservoirs.
Community benefits	
Concern that residents will not benefit from the Proposed Development in terms of lower energy costs and renewable energy supply through hydrogen delivery.	While part of the wider HyNet project will deliver a low carbon hydrogen network, this is being developed by other parties and does not form part of the Liverpool Bay CO ₂ Transportation and Storage project. The Proposed Development is concerned with the realignment of the combined electrical and fibre-optic cable. The combined cable will connect the onshore grid at the PoA Terminal to the New Douglas OP in Liverpool Bay, to supply the power and upgraded telecommunications needed to support the receipt and distribution of CO ₂ to the storage sites. We suggest questions about hydrogen should be directed to info@hynet.co.uk who will be able to provide you more information on this topic.

Issue raised	Applicant's response
Traffic and Transport	
Concern about the number of HGVs on local roads during construction.	Traffic and access management including an OCTMP has been consented under the Consented Development [FUL/000246/23] and does not form part of the new TCPA 1990 (as amended) application for the Proposed Development. The OCTMP can be viewed on our project website.
Economic impacts	
Concern about the impact of construction on tourism, notably in the Easter holidays.	The construction work scheduled for the Talacre Beach area will be carried out in two phases: • Phase 1: February to March 2026 – This will include the activities of site mobilisation and HDD tunnelling, such as welding the high density polyethylene (HDPE) conduit, tunnelling under the Gronant Dunes and inserting the HDPE conduit. • Phase 2: July to August 2026 – This will include the activities of submarine cable pull-in and burial across Talacre Beach and through the HDPE conduit under the Dunes until it reaches the Entry Pit, which is where the cable pull-in winch is located. The Applicant is aware of the potential impact construction activity can bring and is working with our contractors and FCC to minimise our impact wherever possible, whilst still delivering the project within the consent provided and constraints present in the area. During the three phases of construction, the following will apply: • Public access to the Talacre beach will be maintained, with segregation from construction equipment and material. This may result in some reduction to public parking during construction periods, which is still being assessed. • The yard area of Warren Farm at the top of Station Road will be used as a logistics hub for receiving construction material and equipment. Smaller vehicles will then be used to transfer equipment to Talacre parking area.

Issue raised	Applicant's response
	The construction programme is not yet confirmed and will be finalised during detailed design and communicated in advance. However, it is the intent that the impact of construction work and deliveries will be minimised during all phases as far as practicable. Where possible deliveries will be scheduled at times of the day to minimise disruption to the public and tourists.

6. CONCLUSION

- 6.1.1. Through PAC activities based on principles and requirements set out in planning legislation, the Applicant has received feedback on the Proposed Development from a range of consultees.
- 6.1.2. The PAC took place between 16 June and 14 July 2025 and received a total of nine responses from Specialist Consultees and members of the public.
- 6.1.3. The main areas or themes of responses and concerns were around environmental impacts on wildlife and Gronant Dunes, community benefits, access to cycle routes and Talacre Beach, impact on tourism and potential disruption during construction (including noise, vibration, parking, and traffic).
- 6.1.4. Based on the comments received to the PAC, no amendments to the Proposed Development are considered necessary. Requests for further information or clarification have been responded to in Tables 5.2, 5.3 and 5.4 and where appropriate, more information is included in the detailed CEMP, which is submitted alongside this full planning application.
- 6.1.5. In conclusion, this report outlines the way in which the Applicant has addressed the PAC requirements outlined in legislation and sets out the response to matters raised during the PAC process.
- 6.1.6. Accordingly, it is requested that the Local Planning Authority considers the content of this report in the processing, validation and assessment of the planning application.

Annexures

Annex A

SITE NOTICE AND PHOTOS

FIGURE A.1 – Site notice page 1 in English

SITE NOTICE



Point of Ayr (PoA) Cable Route Foreshore Works Proposed Development

SECTION 61Z OF THE TOWN AND COUNTRY PLANNING ACT 1990

PUBLICITY AND CONSULTATION BEFORE APPLYING FOR PLANNING PERMISSION NOTICE UNDER ARTICLES 2C AND 2D - Town and Country Planning (Development Management Procedure) (Wales) Order 2012

Purpose of this notice: This notice provides the opportunity to comment directly to the developer on a Proposed Development prior to the submission of a planning application to the local planning authority (LPA) (in this case, Flintshire County Council). Any subsequent planning application will be publicised by the LPA; comments provided in response to this notice will not prejudice your ability to make representations to the LPA on any related planning application. You should note that any comments submitted may be placed on public file.

I give notice that Liverpool Bay CCS Limited, a member of the Eni SpA group (the Applicant), is intending to apply for planning permission for:

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 PoA Gas Terminal.

The Proposed Development is seeking re-authorisation of the same 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 eastwards along Talacre Beach. This realignment was necessitated by stakeholder feedback on the original Marine Licence application to reduce impact on vessel movements in the area. The components of the Proposed Development, and associated construction activities are:

- Construction of part of a cable conduit under the Gronant Dunes using a trenchless HDD method of installation.
- An HDD Exit Pit accompanied by the installation of a temporary steel container - known as a sump - that will capture any drilling fluid emitted from the drilling process. This will be approximately 3m below beach level, roughly 3m x 3m in width and length and will have a capacity of 10m³. Reinstatement of the HDD Exit Pit beach area on completion.
- The installation of a combined electrical and fibre-optic cable within the HDD conduit.
- The simultaneous lay and burial of the cable across Talacre Beach and Foreshore is from the HDD Exit Pit to the MLWS line. The cables have a target burial depth of 2.5m.

There are no other above or below ground structures proposed as part of the Proposed Development. The construction and operation of the cables beyond the MLWS through the marine environment is covered by a separate Marine Licence [CML2365] which was approved in May 2025 by Natural Resources Wales (NRW).

You may inspect copies of the proposed application, plans, and other supporting documents, online at hynethub.co.uk. Computer facilities are available to view this information online at **Prestatyn Library**, 21 King's Avenue, Prestatyn, LL19 9AA or **Holywell Library and Learner's Centre**, 7 Dewi Avenue, Holywell, CH8 7UG.

	Prestatyn Library opening times	Holywell Library and Learner's Centre opening times
Monday	10am to 5pm	9am to 5pm
Tuesday	10am to 5pm	9am to 6pm
Wednesday	closed	9am to 5pm
Thursday	closed	9am to 5pm
Friday	10am to 5pm	9am to 5pm
Saturday	9.30am to 12.30pm	9am to 1pm
Sunday	closed	closed

Anyone who wishes to make representations about this Proposed Development must write to the applicant / agent at:

Email: hello@hynethub.co.uk
Address: FREEPOST LBCCS
Web: hynethub.co.uk/poa
Please respond by 11:59pm on 14 July 2025
Martin Currie
Director,
Liverpool Bay CCS Limited

Scan the QR code to visit our website



hynethub.co.uk

FIGURE A.2 – Site notice page 2 in Welsh

HYSBYSIAD SAFLE



Datblygiad Arfaethedig Gwaith Blaendraeth Llwybr Ceblau'r Parlwr Du

ADRAN 61Z O DDEDDF CYNLLUNIO GWLAD A THREF 1990

HYSBYSIAD CYHOEDDUSRWYDD AC YMGYNGHORI CYN GWNEUD CAIS AM GANIATÂD CYNLLUNIO O DAN ERTHYGLAU 2C A 2D - Gorchymyn Cynllunio Gwlad a Thref (Gweithdrefn Rheoli Datblygu) (Cymru) 2012

Diben yr hysbysiad hwn: Mae'r hysbysiad hwn yn rhoi cyfle i roi sylwadau'n uniongyrchol i'r datblygwr ar Ddatblygiad Arfaethedig cyn cyflwyno cais cynllunio i'r awdurdod cynllunio lleol (yn yr achos hwn, Cyngor Sir y Fflint). Bydd unrhyw gais cynllunio dilynol yn cael ei gyhoeddi gan yr awdurdod cynllunio lleol; ni fydd sylwadau a roddir mewn ymateb i'r hysbysiad hwn yn amharu ar eich gallu i wneud sylwadau i'r awdurdod cynllunio lleol ar unrhyw gais cynllunio cysylltiedig. Dylech nodi y mae'n bosibl y gellir rhoi unrhyw sylwadau a gyflwynir ar ffeil gyhoeddus.

Hysbysaf fod Liverpool Bay CCS Limited, aelod o'r grŵp Eni SpA (yr Ymgeisydd), yn bwriadu gwneud cais am ganiatâd cynllunio ar gyfer: **Gosod rhan danddaearol o gwndid Drilio Cyfeiriadol Llorweddol o dan Dwyini Gronant gan ddechrau o Bwll Mynediad Drilio Cyfeiriadol Llorweddol [a ganiatawyd o dan FUL/000246/23], i Bwll Ymadael Drilio Cyfeiriadol Llorweddol wedi'i gladdu ar linell Penllanw Cymedrig y Gorllanw, a chladdu ceblau trydanol a ffeibr-optig cyfun ar draws Blaendraeth a Thraeth Talacre i linell Cymedrig y Distyll, a leolir i'r gogledd-orllewin o Derfynell Nwy'r Parlwr Du.**

Mae'r Datblygiad Arfaethedig yn ceisio ail-awdurdodi'r un gwaith a ganiatawyd o dan gyfeirnod cais: FUL/000246/23 a ganiatawyd ym mis Mai 2024 ("y Datblygiad a Ganiatawyd"), ond ar aliniad newydd sydd tua 250m ymhellach tua'r dwyrain ar hyd Traeth Talacre. Roedd angen yr aliniad hwn oherwydd adborth rhanddeiliaid ar y cais gwreiddiol am Drwydded Forol i leihau'r effaith ar symudiadau llongau yn yr ardal. Dyma elfennau'r Datblygiad Arfaethedig, a gweithgareddau adeiladu cysylltiedig:

- Adeiladu rhan o gwndid ceblau o dan Dwyini Gronant gan ddefnyddio dull gosod Drilio Cyfeiriadol Llorweddol heb ffosydd.
- Mae Pwll Ymadael Drilio Cyfeiriadol Llorweddol, yn golygu gosod, tua 3m o dan lefel y traeth, swmp cyfyngu dur parod dros dro, tua 3m x 3m o led a hyd, i ddal unrhyw hylif drilio a ollyngir gan y broses ddrilio. Bydd gan hwn gapasiti o tua 10m³. Adfer y traeth yn ardal Pwll Ymadael y Drilio Cyfeiriadol Llorweddol ar ôl cwblhau'r gwaith.
- Gosod ceblau trydanol a ffeibr-optig cyfunol o fewn y cwndid Drilio Cyfeiriadol Llorweddol.
- Mae'r gosodiad a chladdedigaeth cydamserol y cebl ar draws Traeth a Blaendraeth Talacre yn ymestyn o'r Pwll Ymadael y Drilio Cyfeiriadol Llorweddol i'r llinell Cymedrig y Distyll. Mae gan y ceblau dyfnder claddu targed o 2.5m.

Nid oes unrhyw strwythurau eraill uwchben nac o dan y ddaear yn cael eu cynnig fel rhan o'r Datblygiad Arfaethedig. Mae adeiladu a gweithredu'r ceblau y tu hwnt i linell Cymedrig y Distyll drwy'r amgylchedd morol yn cael ei gynnwys gan Drwydded Forol ar wahân [CML2365] a gymeradwywyd ym mis Mai 2025 gan Cyfoeth Naturiol Cymru (CNC).

Gallwch weld copïau o'r cais arfaethedig, cynlluniau, a dogfennau ategol eraill, ar-lein yn hynethub.co.uk. Mae cyfleusterau cyfrifiadurol ar gael i weld yr wybodaeth hon ar-lein yn **Llyfrgell Prestatyn**, 21 Rhodfa'r Brenin, Prestatyn, LL19 9AA neu **Lyfrgell a Chanolfan Dysgwyr Treffynnon**, 7 Dewi Avenue, Treffynnon, CH8 7UG.

	Oriau agor Llyfrgell Prestatyn	Oriau agor Llyfrgell a Chanolfan Dysgwyr Treffynnon
Dydd Llun	10am i 5pm	9am i 5pm
Dydd Mawrth	10am i 5pm	9am i 6pm
Dydd Mercher	ar gau	9am i 5pm
Dydd Iau	ar gau	9am i 5pm
Dydd Gwener	10am i 5pm	9am i 5pm
Dydd Sadwrn	9.30am i 12.30pm	9am i 1pm
Dydd Sul	ar gau	ar gau

Mae'n rhaid i unrhyw un sy'n dymuno gwneud sylwadau am y Datblygiad Arfaethedig hwn ysgrifennu at yr ymgeisydd / asiant yn:

E-bost: hello@hynethub.co.uk
Cyfeiriad: FREEPOST LBCCS
Gwefan: hynethub.co.uk/poa
Ymatebwch erbyn 11.59pm ar 14 Gorffennaf 2025
Martin Currie
Cyfarwyddwr,
Liverpool Bay CCS Limited

Sganiwch y cod QR i ymweld â'n gwefan



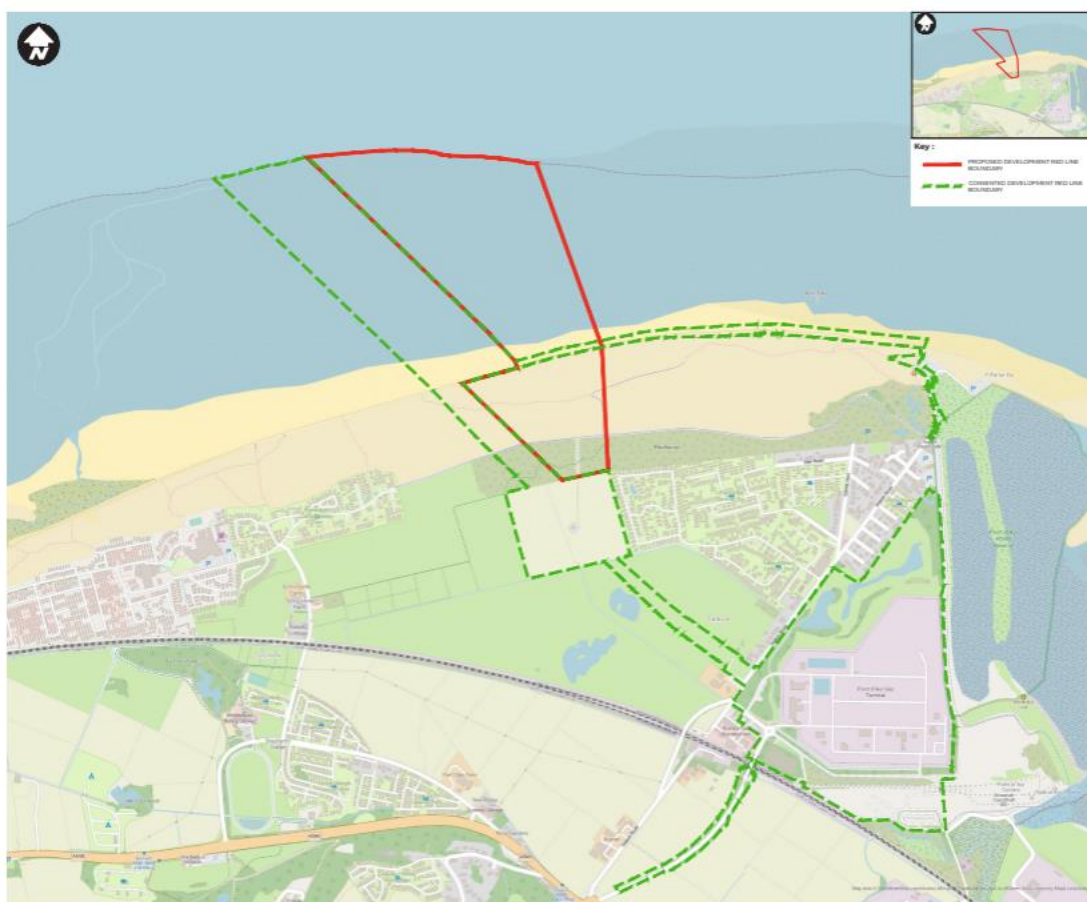
hynethub.co.uk

FIGURE A.3 – Site notice page 3 in English and Welsh

SITE NOTICE / HYSBYSIAD SAFLE



- ▶ The Proposed Development Red Line Boundary (RLB) is shown in Map 1. You can also see the RLB consented under planning permission FUL/000246/23 (Green Dotted Line) in comparison to the Proposed Development RLB (Red Line).
- ▶ Dangosir Ffin Llinell Goch y Datblygiad Arfaethedig ym Map 1. Gallwch hefyd weld y Ffin Llinell Goch a ganiatawyd o dan ganiatâd cynllunio FUL/000246/23 (Llinell Werdd Ddotiog) o'i chymharu â Ffin Llinell Goch y Datblygiad Arfaethedig (Llinell Goch).



Map 1

RLB of the Proposed Development and Consented Development.

Ffin Llinell Goch y Datblygiad Arfaethedig a'r Datblygiad a Ganiatawyd.

Table Annex A – Site notice photos from 13 June to 14 July 2025

Order	Notice ID	Inspection date	Observation	Act	Photo
1	SN1	13/06/2025 11:31	OK	Initial Placement	
2	SN1	13/06/2025 11:32	OK	Initial Placement	
3	SN1	20/06/2025 15:23	Missing	Replacement	

Order	Notice ID	Inspection date	Observation	Act	Photo
4	SN1	20/06/2025 15:26	OK	Replaced	
5	SN1	26/06/2025 10:20	OK	None required	
6	SN1	26/06/2025 10:20	OK	None required	

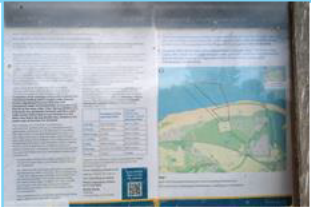
Order	Notice ID	Inspection date	Observation	Act	Photo
7	SN1	03/07/2025 16:11	OK	None required	
8	SN1	03/07/2025 16:11	OK	None required	
9	SN1	11/07/2025 15:15	OK	None required	

Order	Notice ID	Inspection date	Observation	Act	Photo
10	SN1	11/07/2025 15:15	OK	None required	
11	SN2	13/06/2025 11:43	OK	Initial Placement	
12	SN2	13/06/2025 11:43	OK	Initial Placement	

Order	Notice ID	Inspection date	Observation	Act	Photo
13	SN2	20/06/2025 09:26	OK	None required	
14	SN2	20/06/2025 09:27	OK	None required	
15	SN2	26/06/2025 10:24	Missing	Replacement	

Order	Notice ID	Inspection date	Observation	Act	Photo
16	SN2	26/06/2025 15:03	OK	Replaced	
17	SN2	03/07/2025 16:14	OK	None required	

Order	Notice ID	Inspection date	Observation	Act	Photo
18	SN2	03/07/2025 16:14	OK	None required	
19	SN2	11/07/2025 15:16	OK	None required	
20	SN2	11/07/2025 15:16	OK	None required	

Order	Notice ID	Inspection date	Observation	Act	Photo
21	SN2	13/06/2025 11:52	OK	Initial Placement	
22	SN3	13/06/2025 11:52	OK	Initial Placement	
23	SN3	20/06/2025 15:18	OK	None required	
24	SN3	20/06/2025 15:18	OK	None required	
25	SN3	26/06/2025 1:27	OK	None required	

Order	Notice ID	Inspection date	Observation	Act	Photo
26	SN3	26/06/2025 10:27	OK	None required	
27	SN3	03/07/2025 16:17	OK	None required	
28	SN3	03/07/2025 16:17	OK	None required	
29	SN3	11/07/2025 15:16	OK	None required	

Order	Notice ID	Inspection date	Observation	Act	Photo
30	SN3	11/07/2025 15:16	OK	None required	
31	SN4	13/06/2025 12:06	OK	Initial Placement	
32	SN4	13/06/2025 12:06	OK	Initial Placement	

Order	Notice ID	Inspection date	Observation	Act	Photo
33	SN4	20/06/2025 14:39	Unstable	Tied to more a stable pole adjacent to the original position.	
34	SN4	20/06/2025 14:39	OK	None required	
35	SN4	26/06/2025 15:53	Missing	Replacement	

Order	Notice ID	Inspection date	Observation	Act	Photo
36	SN4	27/06/2025 09:30	OK	Replaced	
37	SN4	03/07/2025 16:20	Damaged	Replacement	
38	SN4	03/07/2025 16:21	OK	Replaced	

Order	Notice ID	Inspection date	Observation	Act	Photo
41	SN4	11/07/2025 15:16	Missing one page	Replacement	
42	SN4	11/07/2025 15:50	OK	Replaced	
43	SN5	13/06/2025 12:13	OK	Initial Placement	

Order	Notice ID	Inspection date	Observation	Act	Photo
44	SN5	13/06/2025 12:13	OK	Initial Placement	
45	SN5	20/06/2025 15:07	OK	None required	
46	SN5	20/06/2025 15:07	OK	None required	

Order	Notice ID	Inspection date	Observation	Act	Photo
47	SN5	26/06/2025 10:32	OK	None required	
48	SN5	26/06/2025 10:32	OK	None required	
49	SN5	03/07/2025 16:25	OK	None required	

Order	Notice ID	Inspection date	Observation	Act	Photo
50	SN5	03/07/2025 16:25	OK	None required	
51	SN5	11/07/2025 10:20	OK	None required	
52	SN5	11/07/2025 10:20	OK	None required	

Annex B

NOTIFICATION TO LANDOWNERS

Figure B.1 – Notification of the PAC letter in English sent to host and adjoining landowners and occupiers on 13 June 2025.



liverpool bay ccs limited

Registered Office
Liverpool Bay CCS Limited
Eni House, 10 Ebury Bridge Road
London SW1W 8PZ
United Kingdom
Tel: +44 (0) 20 7344 6000
Fax: +44 (0) 20 7344 6044

<Contact Name>

<Address Line 1>

<Address Line 2>

<Address Line 3>

<Town>

<Postcode>

13 June 2025

Dear <Contact Name>.

Notification of Pre-application Consultation for the Point of Ayr Cable Route Foreshore Works Proposed Development: 16 June – 14 July 2025

We are writing to you on behalf of Liverpool Bay CCS Limited, a member of the Eni SpA group (the Applicant), to advise you of our forthcoming Pre-Application Consultation (PAC) activity on the Point of Ayr (PoA) Cable Route Foreshore Works ("the Proposed Development").

The Proposed Development comprises 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 is seeking re-authorisation of the same works consented under application reference number: FUL/000246/23 granted in May 2024 ("the Consented Development") but on a new alignment that is approximately 250m further east along Talacre Beach. This realignment was necessitated by stakeholder feedback on the original Marine Licence application to reduce impact on vessel movements in the area.

Liverpool Bay CCS Limited
Registered in England & Wales
Company number 13194018



The Proposed Development forms part of the 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.

Please find enclosed further information on the planning application for which you are a consultee. Please ensure your response reaches us by 11.59pm on 14 July 2025.

For more information, please visit hynethub.co.uk/poa. If you have any questions about the CCS infrastructure or would like to provide any feedback on the proposals, email hello@hynethub.co.uk.

Yours faithfully,
Martin Currie
Director, Liverpool Bay CCS Limited

Figure B.2 – Notification of the PAC letter in Welsh sent to host and adjoining landowners and occupiers on 13 June 2025.



liverpool bay ccs limited

Registered Office
Liverpool Bay CCS Limited
Eni House, 10 Ebury Bridge Road
London SW1W 8PZ
United Kingdom
Tel: +44 (0) 20 7344 6000
Fax: +44 (0) 20 7344 6044

<Contact Name>
<Address Line 1>
<Address Line 2>
<Address Line 3>
<Town>
<Postcode>

13 Mehefin 2025

Annwyl <Contact Name>,

Hysbysiad o Ymgynghoriad Cyn Ymgeisio ar gyfer Datblygiad Arfaethedig Gwaith Blaendraeth Llwybr Ceblau'r Parlwr Du: 16 Mehefin – 14 Gorffennaf 2025

Rydym yn ysgrifennu atoch ar ran Liverpool Bay CCS Limited, aelod o'r grŵp Eni SpA (yr Ymgeisydd), i roi gwybod i chi am ein gweithgaredd Ymgynghoriad Cyn Ymgeisio sydd ar ddod ar Waith Blaendraeth Llwybr Ceblau'r Parlwr Du ("y Datblygiad Arfaethedig").

Mae'r Datblygiad Arfaethedig yn cynnwys gosod rhan danddaearol o gwndid Drilio Cyfeiriadol Llorweddol o dan Dwyni Gronant gan ddechrau o Bwll Mynediad Drilio Cyfeiriadol Llorweddol (a ganiatawyd o dan FUL/000246/23), i Bwll Ymadael Drilio Cyfeiriadol Llorweddol wedi'i gladdu ar linell Penllanw Cymedrig y Gorllanw, a chladdu ceblau trydanol a ffeibr optig cyfun ar draws Blaendraeth a Thraeth Talacre i linell Cymedrig y Distyll, a leolir i'r gogledd-orllewin o Derfynell Nwy'r Parlwr Du.

Mae'r Datblygiad Arfaethedig yn ceisio ail-awdurdodi'r un gwaith a ganiatawyd o dan gyfeirnod cais rhif: FUL/000246/23 a roddwyd ym mis Mai 2024 ("y Datblygiad a Ganiatawyd") ond ar aliniad newydd sydd tua 250m ymhellach i'r dwyrain ar hyd Traeth Talacre. Roedd angen yr adlinio hwn oherwydd adborth gan randdeiliaid ar y cais gwreiddiol am Drwydded Forol i leihau'r effaith ar symudiadau llongau yn yr ardal.

Mae'r Datblygiad Arfaethedig yn rhan o seilwaith Trafnidiaeth a Storio CO₂ Bae Lerpwl i wasanaethu Prosiect HyNet North West ehangach. Mae HyNet yn brosiect cipio, cludo

Liverpool Bay CCS Limited
Registered in England & Wales
Company number 13194018



a storio carbon a hydrogen carbon isel a fydd yn datgloi economi carbon isel ar gyfer Gogledd-orllewin Lloegr a Gogledd Cymru gan roi'r rhanbarth ar flaen y gad yn ymgyrch y DU tuag at Sero Net.

Mae mwy o wybodaeth wedi'i hamgáu am y cais cynllunio yr ydych yn ymgynghorai ar ei gyfer. Gwnewch yn siŵr bod eich ymateb yn ein cyrraedd erbyn 11.59pm ar 14 Gorffennaf 2025.

Am fwy o wybodaeth, ewch i hynethub.co.uk/poa. Os oes gennych unrhyw gwestiynau am seilwaith CCS neu os hoffech roi unrhyw adborth ar y cynigion, anfonwch e-bost i hello@hynethub.co.uk

Yr eiddoch yn ffyddlon,
Martin Currie
Cyfarwyddwr, [Liverpool Bay CCS Limited](#)

Annex C

LIST OF LOCAL COMMUNITY CONSULTEES

Table Annex C - Community groups and contacts

The table below lists the community groups and contacts that were notified of the statutory PAC.

ORGANISATIONS
Inside Flintshire Magazine
Roofing Sheets Direct
Kendley Ltd.
The Ivy Emporium
Talacre Beach Resort
Thompson's Funland (PERMANENTLY CLOSED)
Grace's American Diner
Refugee Kindness - North Wales
Disability Wales
Age Cymru
Mind Cymru
Transport for Wales / fflecsi
TrawsCymru
Environment Agency
Ayr View Caravan Park
Darwin Escapes
Point of Ayr Holiday Park, Lyons Holiday Parks
Beachway
Maritos
Lighthouse Inn
TL Contractors Ltd
Delyn Metals
Granary Court Business Park
The K9 Pet Shop, Talacre/ Raw dog food
Sandancer Amusements
Branwen Holiday Home
Clwyd Bakeries
The Point Bar & Restaurant
Talacre Community Centre
Prestatyn Library
Holywell Library and Learner's Centre
Kal's Cash and Carry
Lola and Suggs
DangerPoint
The Point of Ayr Federation
Llanasa Conservation Society
North Wales Wildlife Trust
Silver Birch Caravan Park
The Mane Cafe

ORGANISATIONS
Bridlewood Equestrian Centre
Lobitos Tyre Depot
Amber Coffee House
The Little Daxie Hotel
The Masons Arms

Annex D

NOTIFICATION TO COMMUNITY CONSULTEES

FIGURE D.1 – Notification of PAC sent to Community Consultees on 16 June 2025

Notification of Pre-application Consultation for the Point of Ayr Cable Route Foreshore Works Proposed Development: 16 June – 14 July 2025



To hello@hynethub.co.uk on 2025-06-16 09:23

Details Plain text

Site Notice (English) - Hysbysiad Safle (Cymraeg).pdf (~1.5 MB)

Dear Stakeholder / Annwyl Rhanddeiliad,

I am emailing you on behalf of Liverpool Bay CCS Limited (LBCCS), a member of the Eni SpA group (the Applicant), to advise you that the 28-day Pre-Application Consultation for the Point of Ayr (PoA) Cable Route Foreshore Works (the Proposed Development) commenced today on Monday 16 June.

The Proposed Development is seeking re-authorisation of the same works consented under application reference number: FUL/000246/23 granted in May 2024 ("the Consented Development"), but on a new alignment of the electrical and fibre-optic cable that is approximately 250m further east along Talacre Beach. This realignment was necessitated by stakeholder feedback on the original Marine Licence application to reduce impact on vessel movements in the area.

Please find attached further information on the planning application for which you are a consultee. Please ensure your response reaches us by 11.59pm on Monday 14 July 2025.

The Proposed Development forms part of the Liverpool Bay CO₂ Transportation and Storage (T&S) 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 north Wales and the north west of England and put the region at the forefront of the UK's drive to Net Zero. The combined electrical and fibre-optic cable will connect the onshore grid at the PoA Terminal to the New Douglas Offshore Platform (OP) in Liverpool Bay, to supply the power and upgraded telecommunications needed to support the receipt and distribution of CO₂ to the storage sites.

The proposal

The main elements of the Proposed Development are:

- Construction of part of a cable conduit under the Gronant Dunes using a trenchless horizontal directional drilling (HDD) method of installation.
- An HDD Exit Pit accompanied by the installation of a temporary steel container - known as a sump - that will capture any drilling fluid emitted from the drilling process. This will be approximately 3m below beach level, roughly 3m x 3m in width and length and will have a capacity of 10m³. Reinstatement of the HDD Exit Pit beach area on completion.
- The installation of a combined electrical and fibre-optic cable within the HDD conduit.
- The simultaneous lay and burial of the cable across Talacre Beach and Foreshore is from the HDD Exit Pit to the Mean Low Water Spring (MLWS) line. The cables have a target burial depth of 2.5m.

Next steps

To gain consent to build the Proposed Development, the Applicant is preparing a planning application, which will be submitted under the Town and Country Planning Act 1990 (as amended) to Flintshire County Council in August 2025.

The Proposed Development is currently in its pre-application phase, where the Applicant is engaging with local stakeholders and compiling information required to support the planning application. You can learn more about the proposal as well as view the draft planning application documents for comment by visiting our project website: hynethub.co.uk/poa.

If you have any questions or would like to provide any feedback on the proposal, please email hello@hynethub.co.uk. All feedback will be considered when finalising the application.

Yours faithfully / Yr eiddoch yn ffyddlon,

Anna Light

Stakeholder Manager

On behalf of Liverpool Bay CCS Limited

Annex E

NOTIFICATION TO SPECIALIST CONSULTEES

FIGURE E.1 – Notification of PAC sent to Specialist Consultees on 16 June 2025

Notification of Pre-application Consultation for the Point of Ayr Cable Route Foreshore Works Proposed Development: 16 June – 14 July 2025



To hello@hynethub.co.uk on 2025-06-16 09:19

 Details  Plain text

Site Notice (English) - Hysbysiad Safle (Cymraeg).pdf (~1.5 MB) ▼

Dear Stakeholder / Annwyl Rhanddeiliad,

Notification of Pre-application Consultation for the Point of Ayr Cable Route Foreshore Works Proposed Development: 16 June – 14 July 2025

We are writing to you on behalf of Liverpool Bay CCS Limited, a member of the Eni SpA group (the Applicant), to advise you of our forthcoming Pre-Application Consultation (PAC) activity on the Point of Ayr (PoA) Cable Route Foreshore Works ("the Proposed Development").

The Proposed Development comprises 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 is seeking re-authorisation of the same works consented under application reference number: FUL/000246/23 granted in May 2024 ("the Consented Development") but on a new alignment that is approximately 250m further east along Talacre Beach. This realignment was necessitated by stakeholder feedback on the original Marine Licence application to reduce impact on vessel movements in the area.

The Proposed Development forms part of the 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.

Please find enclosed further information on the planning application for which you are a consultee. Please ensure your response reaches us by 11.59pm on 14 July 2025.

For more information, please visit hynethub.co.uk/poa. If you have any questions about the CCS infrastructure or would like to provide any feedback on the proposals, email hello@hynethub.co.uk.

Hysbysiad o Ymgynghoriad Cyn Ymgeisio ar gyfer Datblygiad Arfaethedig Gwaith Blaendraeth Llwybr Ceblau'r Parlwr Du: 16 Mehefin – 14 Gorffennaf 2025

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Mae'r Datblygiad Arfaethedig yn rhan o seilwaith Trafnidiaeth a Storio CO2 Bae Lerpwl i wasanaethu Prosiect HyNet North West ehangach. Mae HyNet yn brosiect cipio, cludo a storio carbon a hydrogen carbon isel a fydd yn datgloi economi carbon isel ar gyfer Gogledd-orllewin Lloegr a Gogledd Cymru gan roi'r rhanbarth ar flaen y gad yn ymgyrch y DU tuag at Sero Net.

Mae mwy o wybodaeth wedi'i hamgáu am y cais cynllunio yr ydych yn ymgynghorai ar ei gyfer. Gwnewch yn siŵr bod eich ymateb yn ein cyrraedd erbyn 11.59pm ar 14 Gorffennaf 2025.

Am fwy o wybodaeth, ewch i hynethub.co.uk/poa. Os oes gennych unrhyw gwestiynau am seilwaith CCS neu os hoffech roi unrhyw adborth ar y cynigion, anfonwch e-bost i hello@hynethub.co.uk

Yours faithfully / Yr eiddoch yn ffyddlon,

Martin Currie

Director / Cyfarwyddwr, Liverpool Bay CCS Limited

Point of Ayr Cable Route Foreshore Works

Pre-Application Consultation Report

Annex F

NOTIFICATION TO LOCAL COMMUNITY GROUPS

FIGURE F.1 – Notification of PAC sent to local community groups and contacts on 16 June 2025

Launch of Pre-application Consultation for the Point of Ayr Cable Route Foreshore Works Proposed Development: 16 June – 14 July 2025



To hello@hynethub.co.uk on 2025-06-16 09:32

Details Plain text

Site Notice (English) - Hysbysiad Safle (Cymraeg).pdf (~1.5 MB)

Dear Stakeholder / Annwyl Rhanddeiliad,

I am emailing you on behalf of Liverpool Bay CCS Limited (LBCCS), a member of the Eni SpA group (the Applicant), to advise you that the 28-day Pre-Application Consultation for the Point of Ayr (PoA) Cable Route Foreshore Works (the Proposed Development) commenced today on Monday 16 June.

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The proposal

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- An HDD Exit Pit accompanied by the installation of a temporary steel container - known as a sump - that will capture any drilling fluid emitted from the drilling process. This will be approximately 3m below beach level, roughly 3m x 3m in width and length and will have a capacity of 10m³. Reinstatement of the HDD Exit Pit beach area on completion.
- The installation of a combined electrical and fibre-optic cable within the HDD conduit.
- The simultaneous lay and burial of the cable across Talacre Beach and Foreshore is from the HDD Exit Pit to the Mean Low Water Spring (MLWS) line. The cables have a target burial depth of 2.5m.

Next steps

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The Proposed Development is currently in its pre-application phase, where the Applicant is engaging with local stakeholders and compiling information required to support the planning application. You can learn more about the proposal as well as view the draft planning application documents for comment by visiting our project website: hynethub.co.uk/poa.

If you have any questions or would like to provide any feedback on the proposal, please email hello@hynethub.co.uk. All feedback will be considered when finalising the application.

Yours faithfully / Yr eiddoch yn ffyddlon,

Anna Light

Stakeholder Manager

On behalf of Liverpool Bay CCS Limited

Annex G

PRE-APPLICATION CONSULTATION MATERIALS

FIGURE G.1 – FAQs

[Protos](#)[Padeswood](#)[Runcorn](#)[Liverpool Bay Offshore](#)[Point of Ayr](#)[Factsheets](#)[FAQs](#)

FAQs

[Return to the Point of Ayr homepage](#)

1. Point of Ayr Cable Route Foreshore Works Overview

What is the Point of Ayr Cable Route Foreshore Works Proposed Development? +

Why do we need the Point of Ayr Cable Route Foreshore Works Proposed Development? +

What are the previous applications that have been submitted in relation to the Point of Ayr Cable Route Foreshore Works Proposed Development? +

Why was the cable route realigned? +

Why does the Point of Ayr Cable Route Foreshore Works Proposed Development require a new planning application? +

Why are you choosing to store carbon in Liverpool Bay gas reservoirs? +

2. Planning process

What is the planning process for the Point of Ayr Cable Route Foreshore Works Proposed Development and where are we now? +

Who makes the decisions on the planning application? +

What are the next steps? +

Why do we need both a Marine Licence application and a planning application for the Point of Ayr Cable Route Foreshore Works Proposed Development? +

3. Communications and engagement

Where can I find out more about the Point of Ayr Cable Route Foreshore Works Proposed Development? +

Who do I contact with a query or question about the project? +

4. Consultation

When can I see a copy of the proposals? +

What will you do with my feedback if I provide it at consultation? +

What are your data protection policies? How will my data be protected? +

5. Community

How will local communities benefit from the Point of Ayr Cable Route Foreshore Works Proposed Development? +

What impact will construction of the Point of Ayr Cable Route Foreshore Works Proposed Development have on the local community? +

Will public access to Talacre Beach be impacted by construction? +

How long will construction take? +

6. Environment

What are the environmental benefits of the Point of Ayr Cable Route Foreshore Works Proposed Development? +

What is the environmental impact of the realigned cable route? +

How will you mitigate impacts on wildlife during construction of the Point of Ayr Cable Route Foreshore Works Proposed Development? +

7. Health and Safety

Are there any concerns for our health and safety in relation to the Point of Ayr Cable Route Foreshore Works Proposed Development? +

8. Construction

When will you start building the Point of Ayr Cable Route Foreshore Works Proposed Development? +

How will you minimise the disruption caused by construction of the Point of Ayr Cable Route Foreshore Works Proposed Development on vessel movements in and out of the Port of Mostyn? +

How will you deal with waste from construction of the Point of Ayr Cable Route Foreshore Works Proposed Development? +

9. Other Point of Ayr developments

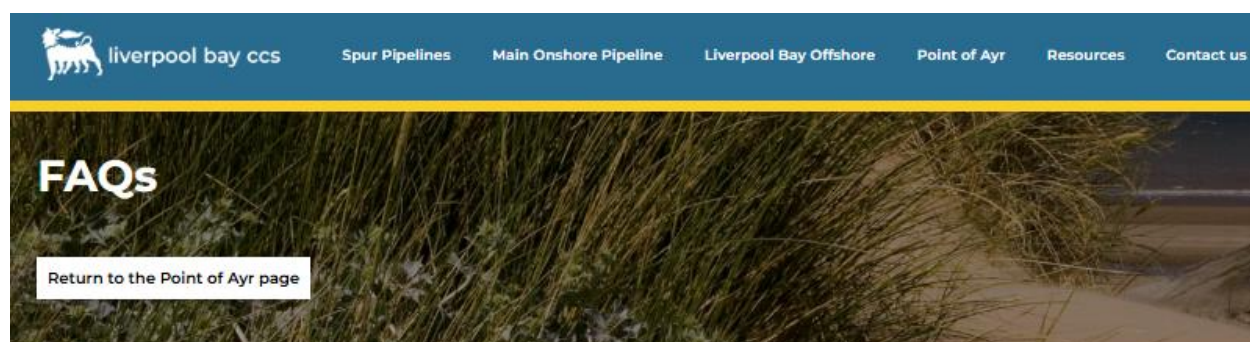
What other work is planned at Point of Ayr? +

[Return to the Point of Ayr homepage](#)

Share this page:



FIGURE G.2 – FAQs updated following attendance of the Llanasa Community Council meeting, and the monitoring of social media and the project inbox.



1. Point of Ayr Cable Route Foreshore Works Overview

What is the Point of Ayr Cable Route Foreshore Works Proposed Development?	+
Why do we need the Point of Ayr Cable Route Foreshore Works Proposed Development?	+
What are the previous applications that have been submitted in relation to the Point of Ayr Cable Route Foreshore Works Proposed Development?	+
Why was the cable route realigned?	+
Why does the Point of Ayr Cable Route Foreshore Works Proposed Development require a new planning application?	+
Will the cables be buried?	+
Why is the red line boundary so large?	+
Why are you choosing to store carbon in Liverpool Bay gas reservoirs?	+
Does the Proposed Development involve hydrogen?	+

2. Planning process

What is the planning process for the Point of Ayr Cable Route Foreshore Works Proposed Development and where are we now?	+
--	---

Who makes the decisions on the planning application?	+
What are the next steps?	+
Why do we need both a Marine Licence application and a planning application for the Point of Ayr Cable Route Foreshore Works Proposed Development?	+

3. Communications and engagement

Where can I find out more about the Point of Ayr Cable Route Foreshore Works Proposed Development?	+
Who do I contact with a query or question about the project?	+

4. Consultation

When can I see a copy of the proposals?	+
What will you do with my feedback if I provide it at consultation?	+
What are your data protection policies? How will my data be protected?	+

5. Community

How will local communities benefit from the Point of Ayr Cable Route Foreshore Works Proposed Development?	+
Will there be any noise and vibration from the construction?	+
What impact will construction of the Point of Ayr Cable Route Foreshore Works Proposed Development have on the local community?	+
Will public access to Talacre Beach be impacted by construction?	+

How long will construction take? +

6. Environment

What are the environmental benefits of the Point of Ayr Cable Route Foreshore Works Proposed Development? +

What is the environmental impact of the realigned cable route? +

How will you mitigate impacts on wildlife during construction of the Point of Ayr Cable Route Foreshore Works Proposed Development? +

Will Gronant Dunes be damaged by the cable laying and impact flood defences? +

7. Health and Safety

Are there any concerns for our health and safety in relation to the Point of Ayr Cable Route Foreshore Works Proposed Development? +

8. Construction

When will you start building the Point of Ayr Cable Route Foreshore Works Proposed Development? +

How will you minimise the disruption caused by construction of the Point of Ayr Cable Route Foreshore Works Proposed Development on vessel movements in and out of the Port of Mostyn? +

Will drilling fluid leak onto the beach? +

How will you deal with waste from construction of the Point of Ayr Cable Route Foreshore Works Proposed Development? +

9. Other Point of Ayr developments

What other work is planned at Point of Ayr? +

Annex H

PRE-APPLICATION CONSULTATION WEBSITE

FIGURE H.1 – Screenshots of the PAC website homepage hosted on the HyNet Hub – which is used for other LBCCS projects - as of 16 June 2025

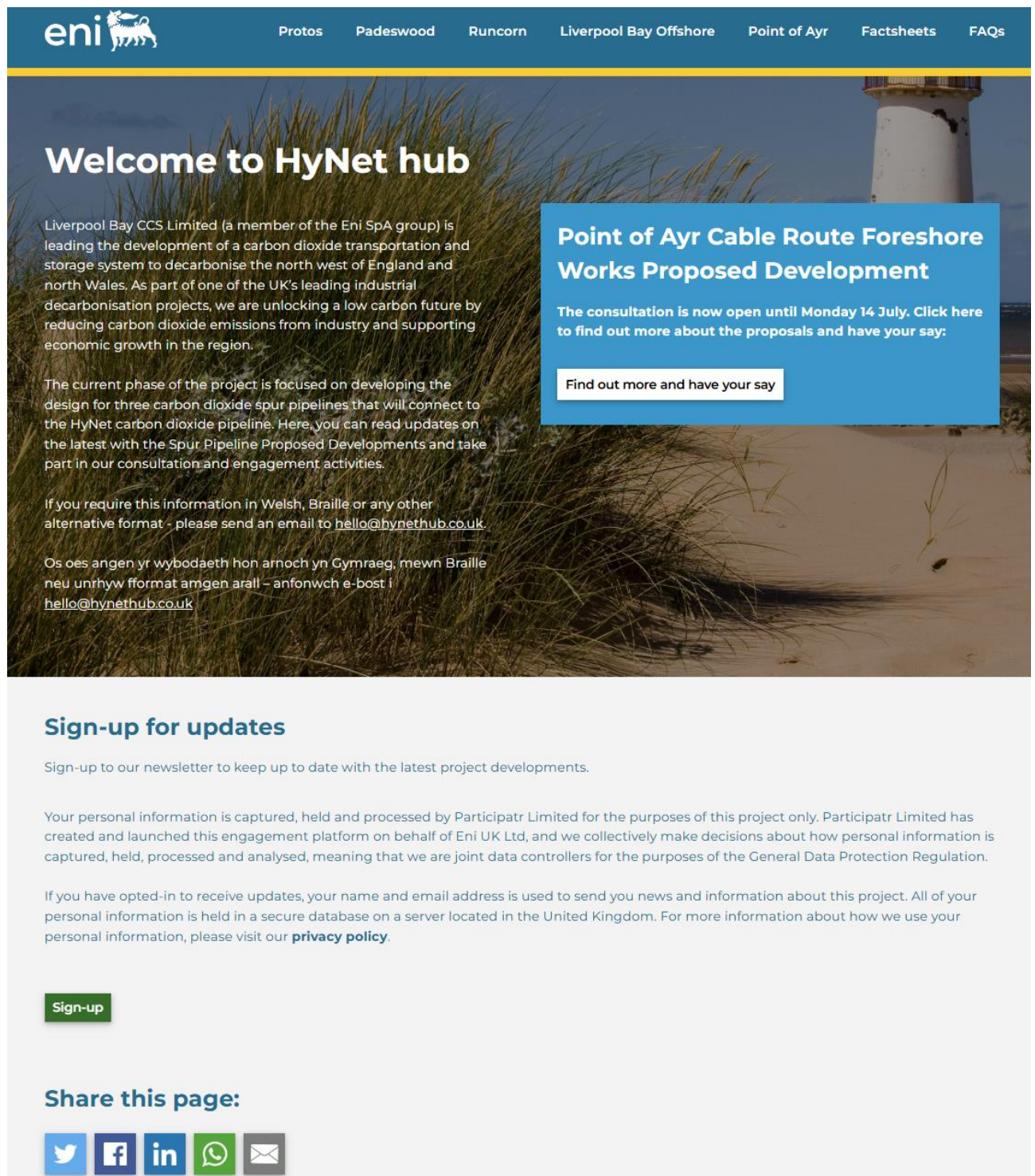


FIGURE H.2 – Screenshots of the “Point of Ayr” webpage as of 16 June 2025



ProtosPadeswoodRuncornLiverpool Bay OffshorePoint of AyrFactsheetsFAQs

Point of Ayr Cable Route Foreshore Works Proposed Development

Introduction

Liverpool Bay CCS Limited (LBCCS), a member of the Eni SpA group (the Applicant), is proposing a realignment to the cable route element of the consented Point of Ayr (PoA) Terminal and Foreshore Works ("the Consented Development") that was granted planning permission in May 2024 [FUL/000246/23] by Flintshire County Council (FCC) Planning Committee. The Consented Development comprises new infrastructure and modifications to existing facilities at the PoA Terminal in Flintshire to operate with carbon dioxide (CO₂).

Power supply from the onshore grid and upgraded telecommunications are required at the New Douglas Offshore Platform (OP) in Liverpool Bay, which will receive and distribute CO₂ to the storage sites. This will require a combined electrical and fibre-optic cable connection, as part of the Marine element of the works, to be installed between the PoA Terminal, from the Mean High Water Spring (MHWS) line, and the New Douglas OP.

The PoA Cable Route Foreshore Works Proposed Development ("the Proposed Development") comprises 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 MHWS line, and burial of a combined electrical and fibre-optic cable on a new alignment across Talacre Beach and Foreshore to the Mean Low Water Spring (MLWS) line, located to the north-west of the PoA Terminal.

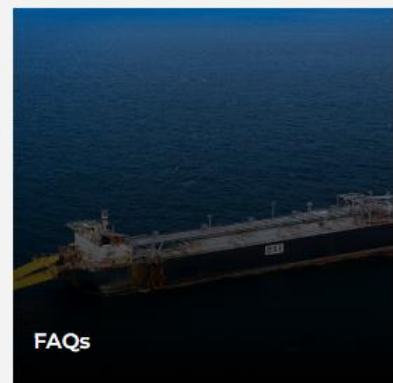
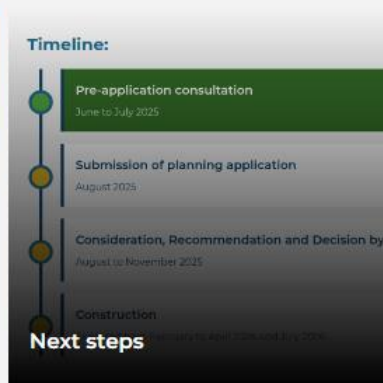
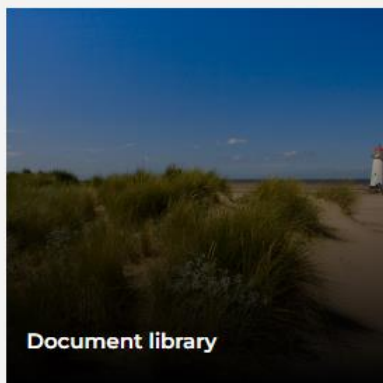
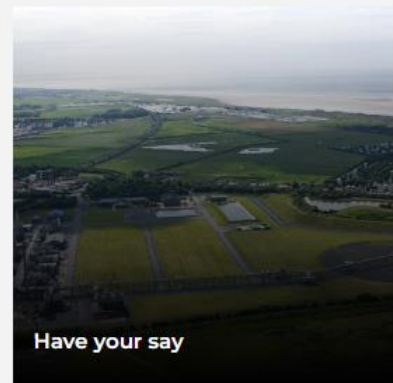
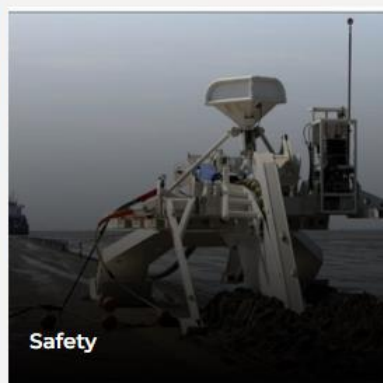
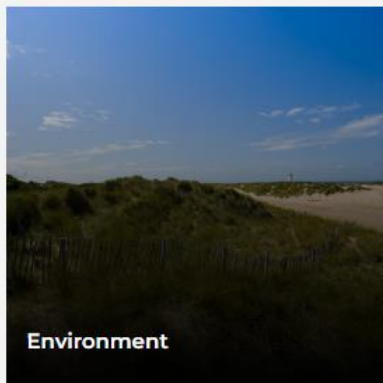
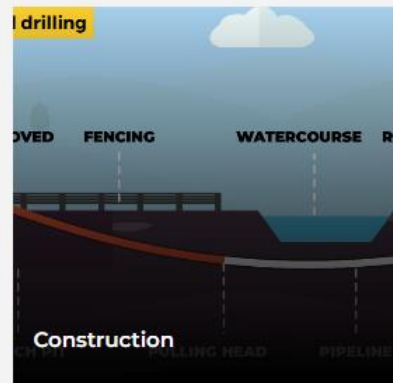
The Consented Development and Proposed Development form part of the Liverpool Bay CO₂ Transportation and Storage (T&S) infrastructure to serve the wider HyNet Project. HyNet is a low carbon hydrogen and carbon capture, transport and storage project that will unlock a low carbon economy for the north west of England and north Wales and put the region at the forefront of the UK's drive to net zero.

The Pre-application Consultation (PAC) period on the Proposed Development is taking place between **16 June and 14 July 2025**. We welcome your input and feedback on the Proposed Development as this will inform our planning application, which we intend to submit to FCC in August 2025.

You can provide your feedback on the Proposed Development or contact us with any enquiries by:

- Sending an email to: hello@hynethub.co.uk
- Writing a letter to: **Freepost LBCCS**. You don't need a stamp.

Click one of the boxes below to find out more:



The consultation materials are also available in Welsh, large print, hard copy, Braille or other languages upon request.

Mae'r deunyddiau ymgynghori hefyd ar gael mewn Cymraeg, print bras, copi caled, Braille, neu ieithoedd eraill ar gais.

Share this page:



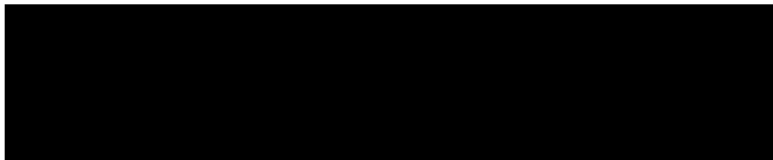
Annex I

PRE-APPLICATION CONSULTATION PROMOTION

FIGURE I.1 – The slides presented at the Llanasa Community Council meeting on Tuesday 24 June to provide information about the Proposed Development to the councillors



Introductions



Cerys Percival
Community &
Communication
Coordinator,
Eni UK / LBCCS

Nicolas Holmberg
Principal
Consultant,
WSP

Mark Green
Deputy
Construction
Manager,
Saipem

Daniel Hooley
Engineering
Geologist,
Eni Progetti

2

LBCCS

Agenda

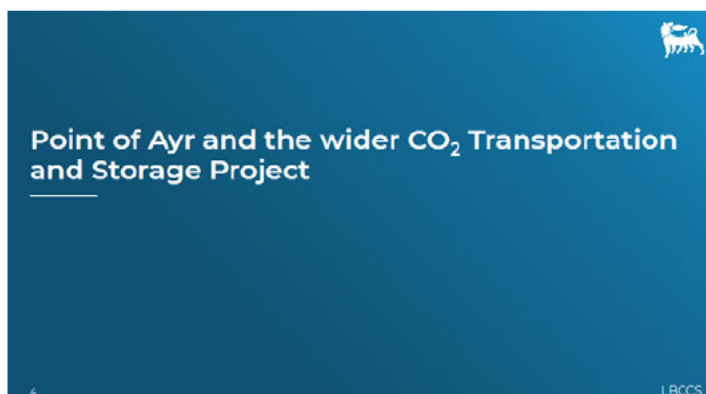


- 1 Point of Ayr and the wider CO₂ Transportation and Storage Project
- 2 Point of Ayr Cable Route Foreshore Works Proposed Development

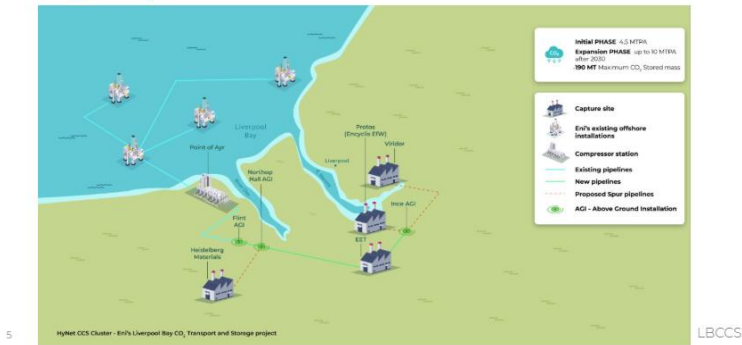
- 3 Current works at Talacre Beach
- 4 Liverpool Bay Point of Ayr Gas Terminal Transition

3

LBCCS



Point of Ayr and the wider CO₂ Transportation and Storage Project



5

The HyNet Project



- HyNet represents a collection of world-leading organisations coming together to build a game-changing energy network, which aims to reduce carbon emissions from industry, and support economic growth in north Wales and the north west of England and in the UK's challenge to meet net zero carbon emissions.
- Carbon capture, transport and storage to serve the wider HyNet Project is being developed by Liverpool Bay CCS Limited, a member of the Eni SpA group, with the potential to reduce carbon dioxide (CO₂) emissions from industry by up to 10 million tonnes every year by the 2030s – the equivalent of taking four million cars off the road.
- HyNet's aims and principles for the transportation and storage of CO₂ have been backed by the UK Government's Department of Energy Security and Net Zero (DESNZ)
- HyNet will also deliver a low carbon hydrogen network that will produce, store and distribute hydrogen to decarbonise the north west of England and north Wales.

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Point of Ayr Cable Route Foreshore Works Proposed Development



7

LBCCS

About the Point of Ayr Cable Route Foreshore Works Proposed Development



The PoA Cable Route Foreshore Works Proposed Development comprises:

- Installing an underground horizontal directional drilling (HDD) conduit beneath Croquet Dunes from the HDD Entry Pit to a buried Exit Pit at the Mean High Water Spring (MHWS) line.
- Burying a combined electrical and fibre-optic cable across Talacre Beach to the Mean Low Water Spring (MLWS) line, situated northwest of the PoA Terminal.

- The Proposed Development is proposing a realignment to the cable route element of the consented Point of Ayr (PoA) Terminal and Foreshore Works, which was granted planning permission on 23 May 2024.
- The New Douglas Offshore Platform (OP) in Liverpool Bay requires power from the onshore grid and upgraded telecommunications.
- A Marine Licence application for the marine component of the work was approved on 22 May 2025.

8

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Overview: Point of Ayr Cable Route Foreshore Works Proposed Development



- Changes based on stakeholder feedback to avoid impacts to vessel movements around the Port of Mostyn.
- Proposed realignment lies outside of consented planning application area so a new alignment is being applied for.
- New application will seek re-authorisation of the consented works but on a new alignment approx 250m further east along Talacre beach.

LBCCS

Previous applications



The Proposed Development is proposing a realignment to the cable route element of the consented Point of Ayr (PoA) Terminal and Foreshore Works ("the Consented Development").

The Consented Development

The Consented Development [FUL/000246/23] comprises new infrastructure and modifications to existing facilities at the PoA Terminal in Flintshire to operate with CO₂.

The work at Talacre will involve:

- Changing and using existing infrastructure at the Point of Ayr Gas Terminal to transport CO₂. Some equipment that is no longer needed will be removed and some new equipment will be installed.
- Using the existing gas pipeline from the Point of Ayr Gas Terminal to the mean low water spring mark to transport CO₂.
- Removing the Shut Down Valve compound.
- Laying two electricity cables and two fibre optic cables from the Point of Ayr Gas Terminal to the mean low water spring mark.
- Building and using two new kiosks.

Town and Country Planning Act (TCPA) 1990 application – PAC

The Pre-application Consultation (PAC) took place in 2022 and the Consented Development was granted planning permission in May 2024.

Marine Licence (ML) application in 2024

Natural Resources Wales granted consent for the Marine element of the works in May 2025.

LBCCS

What are the components of the Proposed Development?



The components of the Proposed Development and associated construction activities are:

- **Construction of part of a cable conduit** under the **Gronant Dunes** using a trenchless HDD method of installation.
- An **HDD Exit Pit accompanied by the installation of a temporary steel container** - known as a sump - that will capture any drilling fluid emitted from the drilling process. This will be approximately 3m below beach level, roughly 3m x 3m in width and length and will have a capacity of 10m³. Reinstatement of the HDD Exit Pit beach area on completion.
- **The installation of a combined electrical and fibre-optic cable** within the HDD conduit.
- The simultaneous **lay and burial of the cable** across Talacre Beach and Foreshore is from the HDD Exit Pit to the MLWS line. The cables have a target burial depth of 2.5m.

There are no other above or below ground structures proposed as part of the Proposed Development. The construction and operation of the cables beyond the MLWS through the marine environment is covered by a separate ML [Ref. CML2365].

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LBCCS

Minimising disruption during construction



During construction, we will take all precautions to keep everyone safe. There will be barriers around our temporary work areas and appropriate security in place.

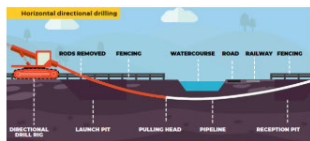
- The construction and support vehicles will use existing roads or tracks to get to where we need to be. Instead of taking lots of heavy cables over the beach, which might damage the environment, some cables will be brought ashore from the sea.
- Temporary diversions will be established across the dunes during the construction period for pedestrian use.
- A temporary fence will be erected to safeguard both the public and workforce and provide security of the works.
- We will work with Port of Mostyn to ensure that the cable lay vessel (CLV) - a specialised ship used to install underwater cables - will be positioned to allow safe and unobstructed passage and manoeuvre of daily vessel movements, at agreed timings, in and out of the Port.
- A temporary construction compound has been consented under FUL/000246/23 and does not form part of the new TCPA application. It will be in the Talacre Beach car park and be used to provide access to the intertidal works area.



Gronant Dunes

LBCCS

The construction process



1. Using cutting-edge technology, we will lay new electric and fibre-optic cables alongside the existing pipeline between the Point of Ayr (PoA) Terminal and the Mean Low Water Spring (MLWS) line.

2. A drilling machine will be placed into the entry pit and will drill a small tunnel across to the exit pit. The holes would then be made safe.

3. The cables will be brought onto the beach by boat before being put into the pit and pulled through the tunnel.

4. Drilling underneath the sand dunes instead of digging through them will minimise disruption to the area as well as environmental impact.

5. The target depth of burial for the cables is 2.5m from the HDD Exit Pit and across Talacre Beach to the MLWS line.

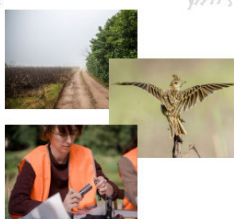
6. There are no other above or below ground structures proposed as a part of the Proposed Development.

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Minimising our impact on the environment

- An EIA was undertaken to consider the potential effects of the construction, operation and maintenance of the PoA Terminal and Foreshore Works ("the Consented Development") on the environment.
- The EIA demonstrated that the Consented Development would not result in any long term significant adverse environmental effects.
- Given the Proposed Development constitutes a realignment of the foreshore elements of the Consented Development, it is not anticipated that there would be any additional adverse effects of the Proposed Development to those identified for the Consented Development.
- An EIA Screening was conducted to determine whether the Proposed Development should be subject to an EIA.
- The Screening Opinion from Flintshire County Council (FCC) on 4 June 2025 confirmed that the Proposed Development **does not** require an EIA as the potential impact on the receiving environment is not considered to be significant because of the localised and temporary nature of the impact.



The planning application will include the following environmental assessments:

- Environmental Studies Report – Cultural Heritage, Biodiversity, Arboriculture
- Stage 1 and 2 Habitats Regulations Assessment (HRA)
- Water Framework Directive (WFD) Assessment
- Net Benefit for Biodiversity (NBB) Assessment
- Construction Environmental Management Plan (CEMP)

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Safety is our top priority

We have extensive experience designing, building, and operating safe and effective Transportation and Storage (T&S) infrastructure to serve carbon capture and storage (CCS) technology.

The UK government regulates all CCS projects, with the Health and Safety Executive (HSE) and the North Sea Transition Authority (NSTA) overseeing safety.

During construction, there will be a limited potential for accidents as no unusual or complex activities are proposed and only a small number of plant and equipment will be used.

The project will follow the Construction Design and Management (CDM) Regulations, 2015, to ensure high safety standards.

During operation, there are no residual risks to or from the cable. A Cable Specification and Installation Plan (CSIP), which demonstrates cable burial to the required depth to avoid hazards and risks, will be developed.

Our commitment to bury cables aligns with the Northwest Inshore and North West Offshore Coast Marine Plans (MMO, 2021).



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Indicative timeline and next steps



This is our statutory Pre-Application Consultation (PAC), in accordance with the Planning (Wales) Act 2015, where we are providing information and draft planning application documents, and asking for feedback. This feedback is important to us and will help finalise our planning application.

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LBCCS

Our Pre-Application Consultation (PAC)



The 28-day statutory PAC consultation on the Point of Ayr Cable Route Foreshore Works Proposed Development is from **Monday 16 June to Wednesday 14 July 2025.**

Consultation and engagement activities and materials
Statutory notification letters and site notices
E-newsletter (with approx. 1,300 subscribers)
Stakeholder emails (launch and reminder)
Project webpage (including FAQs and draft planning application documents)
Presentation at Llanasa Community Council meeting
Project inbox

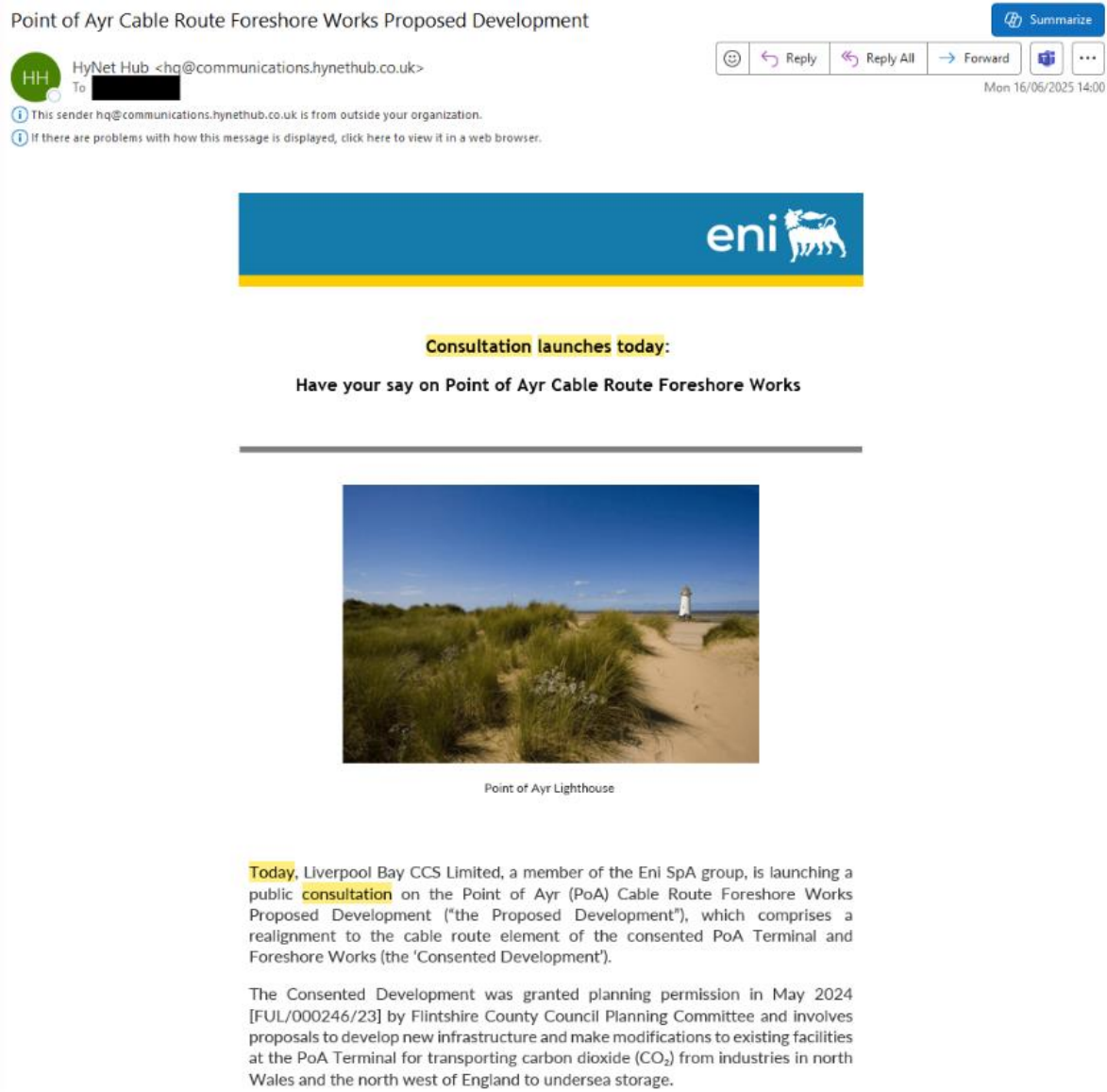
Feedback

The public and stakeholders can provide feedback by:

- Sending an **email** to: hello@hynethub.co.uk. This will be listed on the **website**: hynethub.co.uk, stakeholder emails and briefings, and the e-newsletter.
- Sending written feedback via letter to **freepost address**: [Freepost LBCCS](#).

The consultation materials are also available in Welsh, large print, hard copy, Braille or other languages upon request. [Mae'r deunyddiau ymgynghori hefyd ar gael mewn Cymraeg, print bras, copi caled, Braille, neu ieithoedd eraill ar gais.](#)

FIGURE I.2 – HyNet e-newsletter article published to the mailing list on 16 June announcing the launch of the PAC



In response to stakeholder feedback received as part of the Marine License Application [CML2365], granted on 22 May 2025 by Natural Resources Wales (NRW), the Proposed Development is seeking re-authorisation from Flintshire County Council on a new alignment of the cable route that is approximately 250m further eastwards along the foreshore on Talacre Beach. This realigned route is simpler, shorter and more direct, reducing environmental impact and disruption to vessel movements in the Port of Mostyn.

The Proposed Development forms part of the Liverpool Bay CO₂ Transportation and Storage (T&S) infrastructure to serve the wider HyNet project. HyNet is a low carbon hydrogen and carbon capture, transport and storage project that will unlock a low carbon economy for north Wales and the north west of England and put the region at the forefront of the UK's drive to Net Zero. The combined electrical and fibre-optic cable will connect the onshore grid at the PoA Terminal to the New Douglas Offshore Platform (OP) in Liverpool Bay, to supply the power and upgraded telecommunications needed to support the receipt and distribution of CO₂ to the storage sites.

Find out more and take part in the **consultation**

Our Pre-application **Consultation** period on the Proposed Development will run from **today** (16 June) until 14 July 2025. Visit hynethub.co.uk/poa for to find out more and to read the draft planning application.

If you have any questions or would like to provide any feedback on the Proposed Development, please email hello@hynethub.co.uk or write to us at Freepost LBCCS (you don't need a stamp) by 11.59 PM on Monday 14 July.

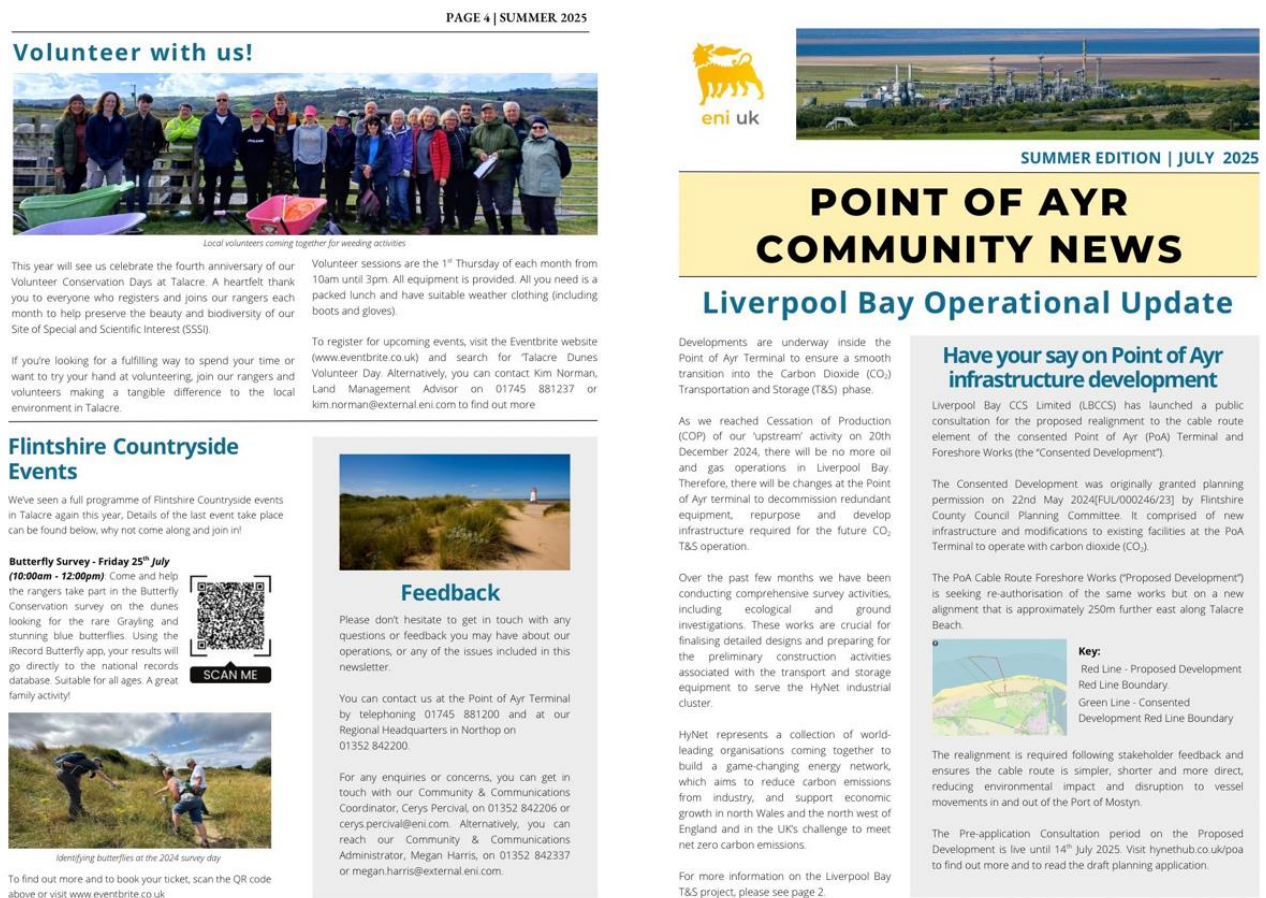
We welcome your input and feedback on the Proposed Development as this will inform our planning application, which we intend to submit to Flintshire County Council in August 2025.



[Terms & Conditions](#) | [Privacy Policy](#) | [Contact](#)

If you would like to unsubscribe from receiving this email, please [click here](#)

FIGURE I.3 – Printed ENI community newsletter hand delivered to local residences on the final week of the PAC containing an article about the Proposed Development



Annex J

SPECIALIST CONSULTTEE RESPONSES

FIGURE J.1 – Response from Heneb Clwyd Powys

Pre-application Consultation for the Point of Ayr Cable Route Foreshore Works Proposed Development - Heneb Comments



From [REDACTED] on 2025-06-19 11:32

From [REDACTED]

To HyNet Hub

Date Thu 11:32

All headers...

 Details  Plain text

Thank you for the re-consultation at the pre-application stage on these TCPA works associated with the HyNet pipeline.

We previously commented on these proposals to the LPA on 6/4/23 and with the minor change to the alignment of the cable trench across the beach in the new application our advice would not change. Mitigation for these works was suggested in 8.10 of the ES and we agreed with the advice. Archaeological monitoring and recording (a watching brief) would be required on the directional drilling access and exit pits, the new cable trench across the beach and on any associated works compound or laydown areas where the topsoil and subsoil are scraped off.

The condition to be used in this case would be:

No development shall take place within the application area until the applicant, or their agents or successors in title, has secured the implementation of a programme of archaeological work in accordance with a written scheme of investigation, which has been submitted by the applicant and approved in writing by the Planning Authority.

The archaeological programme of work will be undertaken and completed in accordance with the relevant Standards and Guidance provided by the Chartered Institute for Archaeologists. A copy of the resulting report should be submitted to the Planning Authority and the Planning Archaeologist, Heneb: Clwyd Powys Archaeology (The Offices, Coed y Dinas, Welshpool, SY21 8RP). After approval by the Planning Authority all project data must be submitted and approved for inclusion in the Heneb: Clwyd Powys Archaeology Historic Environment Record. The full digital archive must also be submitted and approved for inclusion within the National Monuments Record, RCAHMW or the Archaeology Data Service, ADS.

Reason: To secure preservation by record of all archaeological remains which will be impacted by the development

Kind regards

Please note I do not work Fridays

 **Heneb**

www.heneb.org.uk

Ymddiriedolaeth Archaeoleg Cymru | The Trust for Welsh Archaeology

Cadeirydd | Chair: Dr Carol Bell PSG | CEO: Richard Nichols

Mae Heneb yn Sefydliad Cofrestredig gyda'r Chartered Institute for Archaeologists
Heneb is a Registered Organisation with the Chartered Institute for Archaeologists



Swyddfa Oedrestrig: Ty Cornel, 6 Stryd Caerfyrddin, Llandello, Sir Gaerfyrddin, SA19 6AE
Registered Office: Corner House, 6 Carmarthen Street, Llandello, Carmarthenshire, SA19 6AE

[Privacy Policy](#) - [Heneb](#)

FIGURE J.2 - Response from Sustrans

Point of Ayr Cable Route - NCN Diversion 

 From [redacted] on 2025-06-19 09:17

From [redacted]
To hello@hynethub.co.uk
Date Thu 09:17
All headers...
☒ Details  Plain text

 Document_250613_150318.pdf (~511 KB) ▾

Good morning,

I have received the attached document and can see that boundary line for the works covers the National Cycle Network (NCN) route 5. Can you please let me know what provisions are being made to keep the cycle network open, will a diversion be put in place. If you can also provide the times/dates that the NCN will be impacted by the works, I will update our public mapping to show closed/diverted.

Diolch,

[redacted]
Network Development Manager, National Cycle Network Delivery, Cymru

Mobile: [redacted] 

[redacted]


YMUNWCH A'R MUDIAD
sustrans
JOIN THE MOVEMENT

We welcome correspondence in **Welsh** and English.
Rydym yn croesawu gohebiaeth yn y **Gymraeg** a'r Saesneg.

Sustrans is the charity making it easier for people to walk and cycle. We connect people and places, create liveable neighbourhoods, transform the school run and deliver a happier, healthier commute. Join us on our journey. <http://www.sustrans.org.uk/>

Sustrans. Registered Office - Sustrans, 2 Cathedral Square, College Green, Bristol, BS1 5DD. Registered Charity 326550 (England & Wales), SC039263 (Scotland). Company Limited by Guarantee No: 1797726 Company Registered in England.

FIGURE J.3 - Response from Canal and Rivers Trust

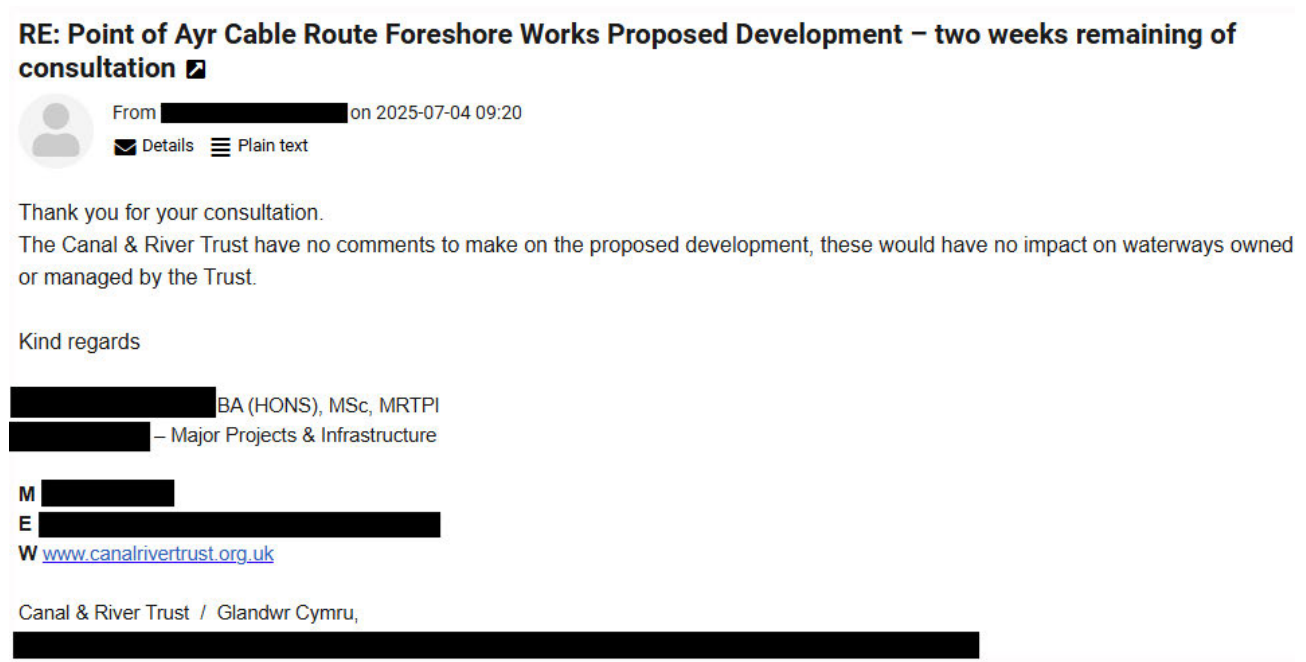
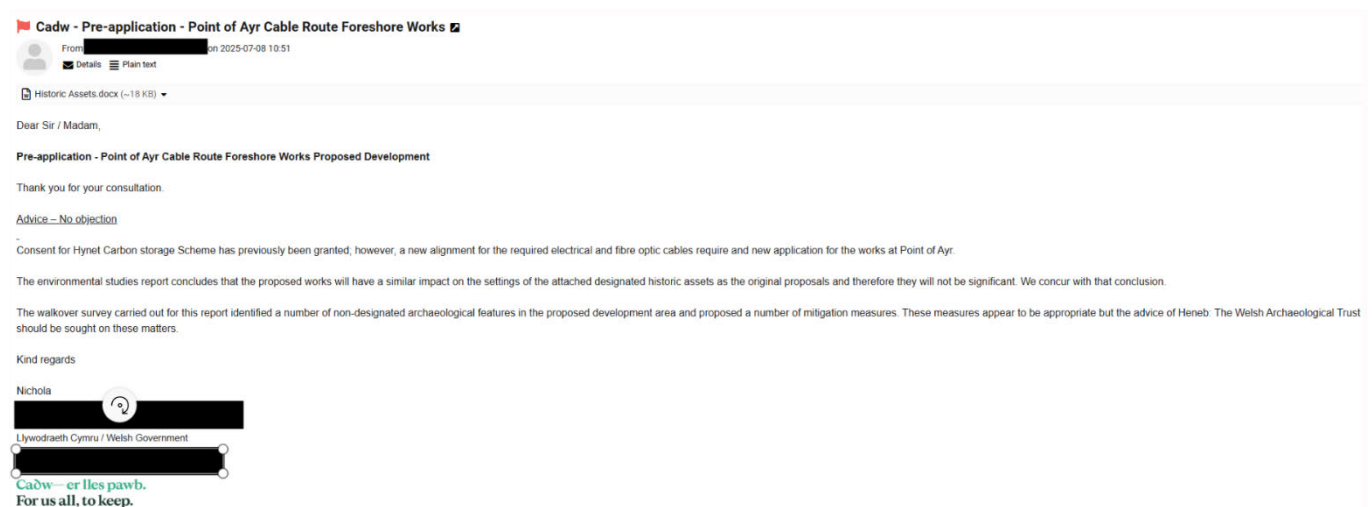


FIGURE J.4 - Response from Cadw



Scheduled Monuments

FL201 Tyn-y-caeau round barrow

Registered Parks and Gardens:

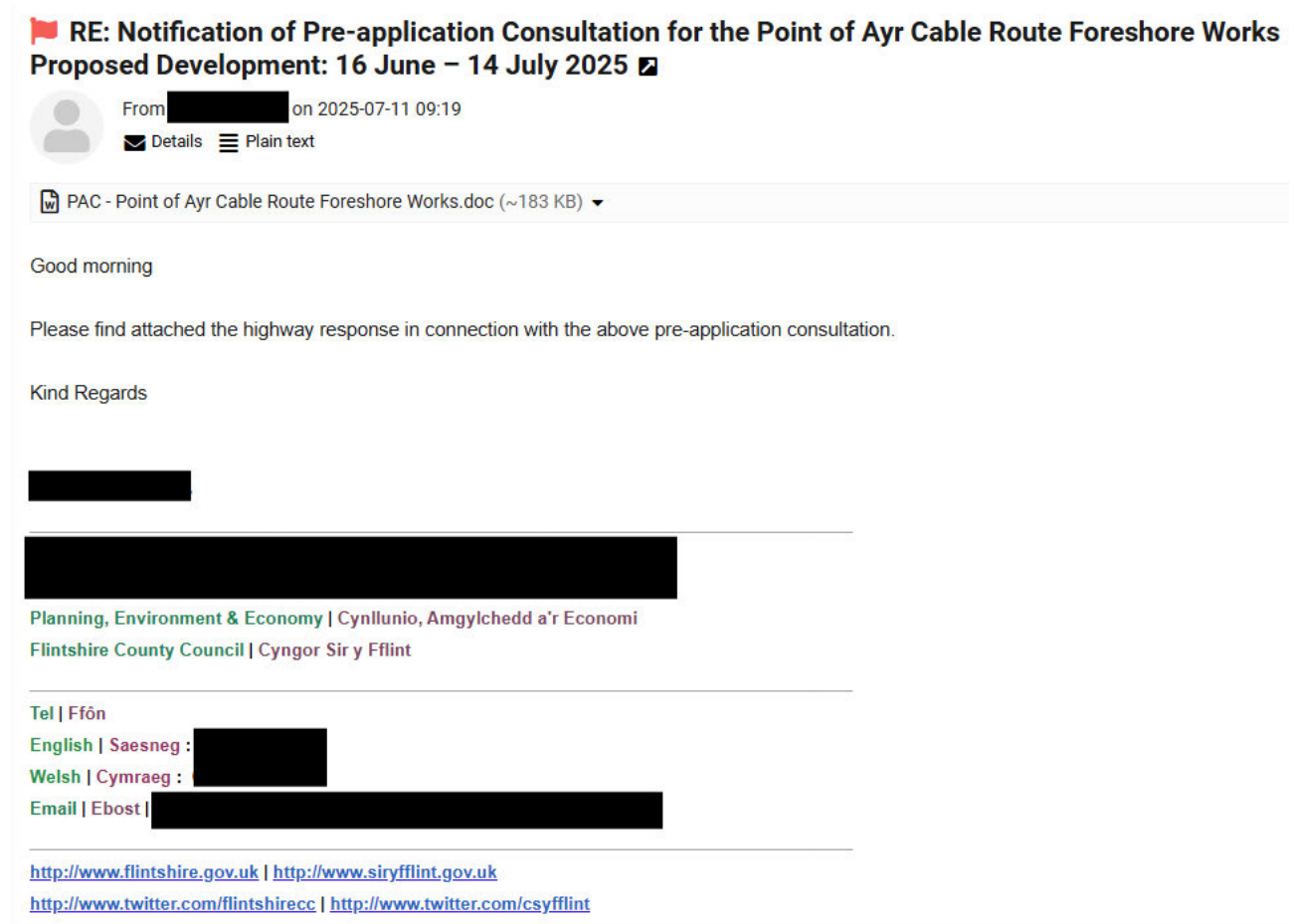
PGW(C)33(FLT) Gyrn Castle

PGW(C)38(FLT) Talacre

Listed Buildings:

288	Pentre Farmhouse	II*
289	Cartref	II
351	Henllystan	II
520	Point of Ayr Lighthouse	II
531	Pen-y-Glasdir	II
558	Talacre Abbey	II*
559	Riding school & stable at Talacre Abbey	II*
560	Banqueting House in Walled Garden at Talacre Abbey	II*
	Walled garden with attached bothies and greenhouses	
561	at Talacre Abbey	II
562	Folly Tower at Talacre Abbey	II
563	Grotto adjoining Folly Tower at Talacre Abbey	II*
564	Home Farm at Talacre Abbey	II*
565	Stable block at Home Farm	II
	Kennels, cottage and saw mill at Talacre Abbey (also	
566	known as The Kennels)	II
14894	North Lodge	II
25076	,1,Pentre Ucha,Gwespyr,Holywell,,CH8 9LW	II
25077	,2,Pentre Ucha,Gwespyr,Holywell,,CH8 9LW	II
25078	Gwespyr War Memorial	II
25079	Gronant Inn	II
25095	St Winefrides	II
25096	St Winefrides School House	II
25097	The School House	II
	Cow house with attached former cart house at Pentre	
25099	Farm	II
25100	St Benedict's Lodge	II
25101	Terrace on N side of Talacre Abbey	II
	Walls enclosing service yard at Talacre Abbey, with	
25102	steps to garden	II
25103	Garden steps on N side of Talacre Abbey	II
25104	Fountain and associated rockwork at Talacre Abbey	II
25112	Gateway and gates at N entrance to Gyrn Castle	II
	Outbuilding on NE side of Home Farm at Talacre	
25125	Abbey	II
25126	Outbuilding with pigsties W of Home Farm	II
25129	Gate piers S of St Benedict's Lodge	II
25136	Picton Yard Farm	II

FIGURE J.5 - Response from Flintshire County Council Highways





By Email

Your Ref/Eich Cyl

Our Ref/Ein Cyl

Date/Dyddiad

11 July 2025

Ask for/Gofynwraig

Direct Dial/Rhif Union

E-mail/ebost

Dear Sirs

**Publicity & Consultation before applying for planning permission notice under articles 2C & 2D – Town & Country Planning (Development Management Procedure) (Wales) Order 2012
Point of Ayr Cable Route Foreshore Works**

I refer to your highway consultation in respect of the above.

Access to the temporary construction compound and works has been granted under FUL/000246/23 and this permission requires the submission of a full Construction Traffic Management Plan and Construction Workers Travel Plan by means of condition.

I can confirm that I have no objection to the proposed new alignment of the cable routing which is proposed to be approximately 250 m further east along Talacre Beach.

Yours sincerely



Ty Dewi Sant, St Davids Park,
Ewloe, Flintshire, CH5 3FF
www.flintshire.gov.uk

Ty Dewi Sant, Parc Dewi Sant,
Ewlo, Sir Y Fflint, CH5 3FF
www.siryfflint.gov.uk

We welcome correspondence in Welsh. We will respond to correspondence received in Welsh without delay.
Rydym yn croeso'n ddwyieithus i bob llyth yn Gymraeg. Yn atebwch yn ddwyieithus i bob llyth a ddarbyddir drwy gyfrwng y Gymraeg.

FIGURE J.6 - Response from NRW

 **CH8 9RD - Point of Ayr Terminal and offshore Liverpool Bay Facilities, Station Road, Talacre, Llanasa, CH8 9RD (Stat Pre App) - NRW Response NRW:02562514** 

 From North Planning on 2025-07-14 15:56
 Details  Plain text

 Point of Ayr - Stat Pre-app - NRW Consultation Response.pdf (~290 KB) ▼

Good Afternoon,

Please find attached our response to the above statutory pre-application consultation, if you have any queries please do not hesitate to contact me.

Cofion Cynnes/Kind Regards
[REDACTED]

Tîm Cynllunio Datblygu / Development Planning Team
Cyfoeth Naturiol Cymru / Natural Resources Wales
[REDACTED]

www.cyfoethnaturiolcymru.gov.uk / www.naturalresourceswales.gov.uk

Yn falch o arwain y ffordd at ddyfodol gwell i Gymru trwy reoli'r amgylchedd ac adnoddau naturiol yn gynaliadwy / Proud to be leading the way to a better future for Wales by managing the environment and natural resources sustainably.

Croesewir gohebiaeth yn Gymraeg a byddwn yn ymateb yn Gymraeg, heb i hynny arwain at oedi / Correspondence in Welsh is welcomed, and we will respond in Welsh without it leading to a delay.

Ein cyf/Our ref: CAS-282729-Z9H2
Eich cyf/Your ref: CH8 9RD

Eni
Via email to: hello@hynethub.co.uk

Dyddiad/Date: 14 July 2025

Annwyl Syr/Madam/Dear Sir/Madam,

STATUTORY PRE-APPLICATION CONSULTATION – TOWN AND COUNTRY PLANNING (DEVELOPMENT MANAGEMENT PROCEDURE) (WALES) ORDER 2012 AS AMENDED

BWRIAD/PROPOSAL: 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 PoA Gas Terminal.

LLEOLIAD/LOCATION: Point of Ayr Terminal and offshore Liverpool Bay Facilities, Station Road, Talacre, Llanasa, CH8 9RD

Thank you for providing a requisite notice to us under Article 2D of the above Order. We received a copy of your proposed application on 15 June 2025.

We have concerns with the application as proposed because inadequate information has been provided. To overcome these concerns, you should provide further information in your planning application regarding flood risk and protected sites.

We also advise that based on the information submitted to date, we would ask the planning authority to include conditions regarding protected sites, protected species, and contamination on any planning permission granted. Without the inclusion of these conditions by the planning authority we may object to the planning application.

Flood Risk

The planning application proposes less vulnerable development. The Flood Map for Planning (FMfP) identifies the application site to be at risk of flooding and within Flood Zone 3 (Sea) and partially within a TAN 15 Defended Zone.

We refer you to Section 10 of Technical Advice Note 15: Development, flooding and coastal erosion, dated 2025 (TAN15) for advice on how the application will be considered in line with current planning policy.

We are unable to give you technical advice on the acceptability of flooding consequences as no Flood Consequences Assessment (FCA) has been submitted. The advice in paragraph 10.24 of TAN15 is clear: *'In zones 2, 3 and TAN 15 defended zone developers must undertake a flood consequences assessment proportionate to the nature and scale of the proposal. Before granting planning permission, decision makers should be satisfied the scheme is justifiable in accordance with the principles set out in section 8, where they are not satisfied, planning permission should be refused.'* Therefore, in accordance with paragraph 15.4, we would advise the LPA to request further information regarding this.

TAN15 advises that the FCA should be proportionate to the nature and scale of the proposal. Developers should refer to all relevant sections of the TAN to determine the scope of the FCA that is required for this particular proposal. Further guidance is also available on our [website](#).

We note that this application is solely for the realignment of part of the cable route element of the works previously consented under planning permission FUL/000246/23 and therefore, considering the nature of the works within the redline boundary, a limited FCA would be appropriate.

Protected Sites

Special Area of Conservation (SAC) / Special Protection Area (SPA) / Dee Estuary Ramsar site

The application site lies within the Dee Estuary SAC, SPA and Ramsar site. We have concerns that a significant effect from the proposed development on the Dee Estuary SAC, SPA and Ramsar site cannot be ruled out.

- Marine Ornithology

We note that the cable laying route has moved eastwards from the original application by approximately 250m and that the information provided states that this is now in an area with lower numbers of foraging little tern (Planning, Design and Access Statement, June 2025, 6.4.1), which are a qualifying feature of the Dee Estuary SPA (and the adjacent Liverpool Bay SPA). Whilst we welcome this, it is important to note that the route is still within the limited foraging range of little tern and therefore our previous advice for the original planning application at this site (letter dated 23/08/23, application ref. FUL/000246/23) regarding timing of the construction works still applies.

The CEMP confirms the installation of the HDD Exit pit on Talacre Beach is to be carried out during February and March 2026 (outside little tern breeding season). However, the CEMP shows the indicative works programme for cable installation to be carried out from early July 2026.

Figures 4.5 and 4.7 of the Construction Environmental Management Plan (CEMP) suggest that breeding little tern should be a consideration until mid-July. As previously advised, recent little tern colony reports suggest there is still significant breeding activity towards the end of the breeding season, particularly in July (e.g. Andrews, Case & Lewis, 2022; Smith et al 2023). Therefore, we reiterate our advice (also included within the Marine Licence CM2365) that these works should avoid the little tern breeding season and be carried out as far into August and September as possible.

If construction works are to be undertaken between April and July inclusive, and if there is any habitat with the potential to be used for nesting little terns within 300m of the development, the Ecological Clerk of Works (EcoW) should check for little tern breeding activity before any works are undertaken. If nesting little tern are present within 300m of the proposed development, no works should be undertaken.

We note that a detailed CEMP is to be submitted and would advise the Local Planning Authority that this should be secured by an appropriate condition attached to any planning permission granted for the proposal. We would wish to be consulted on the detailed CEMP as part of an application to discharge the condition and agree the timing of the works before they commence.

- *Benthic Ecology*

We are content that the proposed changes to the cable route and foreshore works will not result in changes to the effects previously described in the 'shadow' Habitats Regulations Assessment (HRA) for any designated benthic features providing all of the mitigation previously agreed is adhered to; this is in particular reference to advice that NRW provided for both the original planning application (dated 23/08/2025, application ref. FUL/000246/23) and the Marine Licence (CML2365).

To secure the mitigation measures, we would advise that a detailed CEMP, to be submitted and approved in writing by the Local Planning Authority prior to commencement of works, is secured via a suitably worded condition. We advise that provisions of the CEMP include evidencing compliance.

Provided the development is carried out in accordance with that condition, we do not consider that it will adversely affect the integrity of the SAC/SPA/Ramsar site.

- *Dune Slacks*

We note the Environmental Studies Report (11/06/25) acknowledges that the shift of the (previously approved) cable works eastwards brings the HDD beneath the dune slacks with potential to impact upon the hydrology of this area. The report (5.5.5) states that '*given the depth and small diameter of the cable/conduit proposed, any impact is likely to be minimal and localised in extent*'.

We advise that robust justification should be provided to support the above statement and confirm the extent of any potential adverse effect on the dune slacks and its hydrology. This information will be needed by the Local Planning Authority when undertaking their HRA to ensure that it will not adversely affect the integrity of the SAC.

- *Water quality*

We note that the Applicant will advise the Construction Contractor to include measures to protect water quality from Horizontal Directional Drilling (HDD) fluids within the detailed CEMP. We also note that at the exit pit a 10m³ containment sump will be present to contain spillages of any drilling fluid and a plant-friendly alternative to bentonite would be used during HDD. HDD fluids should be managed to ensure that there is no potential for interaction with watercourses. Measures to achieve this, and pollution prevention methods for other

construction sources should be described in the detailed CEMP, including the process for decommissioning any temporary containment sumps.

- *Biosecurity Risk Assessment*

We note a Biosecurity Risk Assessment is to be produced and implemented (section 5.6.3 of the Environmental Studies Report). We would advise the Local Planning Authority to secure the following condition to any planning permission granted.

Condition: No development, including site clearance, shall commence until a Biosecurity Risk Assessment, and Method Statement that considers invasive non-native species and specific diseases (such as the amphibian fungus Chytrid) has been submitted to and approved in writing by the Local Planning Authority. The risk assessment shall include measures to prevent the introduction of and where present control, removal or for the long-term management of invasive species both during construction and operation. The risk assessment shall consider landscaping and other related plans. The Biosecurity Risk Assessment shall be carried out in accordance with the approved details.

Justification: To ensure that an approved Biosecurity Risk Assessment is implemented to secure measures to prevent or control the spread and effective management of any invasive non-native species and listed diseases at the site.

The approved Biosecurity Risk Assessment should be included within the detailed CEMP.

- *Natterjack toad*

Natterjack toad is a feature of the Dee Estuary Ramsar site. We note that paragraph 6.2.17 of the shadow HRA identifies no direct or indirect impact to natterjack toad "*as the cables are laid >2.5 m below the surface, avoiding direct disturbance to the land*". However, page 49 (paragraph d) of the same document states that "*the cables are laid approximately 1 m below the surface*". The planning application will therefore need to confirm the depth at which the cables will be laid beneath the surface.

As the competent authority under the Conservation of Habitats and Species Regulations 2017 (as amended), the Local Planning Authority must, before deciding to give consent for a project which is likely to have a significant effect on a SAC/SPA/Ramsar site, either alone or in combination with other plans or projects, make an appropriate assessment of the implications of the project for that site in view of its conservation objectives. They must for the purposes of the assessment consult NRW and have regard to any representations we make within such reasonable time as is specified. In the absence of that assessment, NRW cannot advise that the proposals would not result in an adverse effect upon the SAC/SPA/Ramsar site.

Site of Special Scientific Interest (SSSI)

The site lies within the Gronant Dunes and Talacre Warren SSSI, which is of special interest for botanical, entomological and ornithological reasons. These dunes, in combination with other associated coastal habitats, represent the only significant remnant of what was once an extensive dune system along the north coast of Wales.

As outlined in the Planning, Design and Access Statement (PDAS) document, (Eni, June 2025, Rev. 01, section 8.3.8) the proposal has the potential to directly impact the SSSI

through temporary habitat loss and physical disturbance of SSSI habitat due to the construction of the HDD entry pit. Works associated with the cable installation (including disturbance and noise) may also have an indirect impact on the SSSI and its features.

The policy position on the protection of SSSIs is set out in Planning Policy Wales (PPW) 6.4.25 - 6.4.27. This states that there is a presumption against all forms of development in a SSSI as a matter of principle, except for developments necessary for the management of a SSSI and minor developments necessary to secure the SSSI's role as a living landscape.

Therefore, in the first instance should a development proposal of this nature be submitted to the LPA we would advise them that a key issue for consideration is whether the location of the development (within a SSSI) can be justified in accordance with national planning policy.

Nonetheless, we note the extant planning permission for this site (ref. FUL/000246/23) and that this would be a separate, yet supplementary, application to implement changes to the previous planning permission. This would therefore be a relevant consideration for the Local Planning Authority.

Providing the impact pathways referenced above and within the 'shadow' HRA (Eni, June 2025, Rev 02) for the Dee Estuary SAC and SPA are adequately addressed, NRW consider the features of the SSSI will also be adequately safeguarded.

We note the 'Net Benefit for Biodiversity and Green infrastructure Statement' Report (eni, June 2025, Rev 02) section 9.1.2, recommends measures to be included within any future habitat management plans. We acknowledge, as per section 10.1.1 that management agreements are in place (and agreed with NRW) to favourably manage the protected sites in perpetuity, providing a means for the applicant to achieve net benefits for biodiversity. We would welcome further discussions between the applicant and NRW environment team to provide greater detail and clarity in respect of what will be offered in terms of commitments towards specific habitat and species work programmes.

Protected Species

We have reviewed the Environmental Studies Report (Eni, Revision 2, June 2025) and provide the following advice regarding protected species.

Bat species

We note that the majority of the affected onshore area is sand dune habitat and therefore, not suitable for roosting bats. However, we concur with section 5.4.29 of the Environmental Studies Report which recognises the presence of dense scrub to the south which provides suitable foraging and potential roosting habitat for bats.

Bats and their breeding and resting places are protected under the Conservation of Habitats and Species Regulations 2017 (as amended). Where bats are present and a development proposal is likely to contravene the legal protection they are afforded, the development may only proceed under licence issued by Natural Resources Wales, having satisfied the three tests set out in the Regulations (please also refer to Paragraph 6.3.7 of Technical Advice Note 5: Nature Conservation and Planning). Please note, for the purposes of providing advice at the planning application stage, our comments are limited to the test relating to "demonstration of no detriment to the maintenance of the favourable conservation status of European protected species".

We consider that the Environmental Studies Report (Eni, Revision 2, June 2025) provides an adequate basis upon which to consider the potential impacts of the scheme on bat species and inform the decision-making process.

Due to the suitable habitat for bats to the south of the site, if lighting is to be used during the construction phase we would advise the Local Planning Authority to secure the following condition against any planning permission granted:

Condition 1: Prior to commencement of development, full details of lighting shall be submitted to and agreed in writing by the Local Planning Authority. This scheme shall consider existing and proposed lighting together with any spillage originating from internal locations. Details shall include:

- An assessment of construction phase lighting in respect of wildlife interests of the site, notably bats
- Details of the siting and type of external lighting and internal light spillage during the construction phase. This shall include plans illustrating the location and type of lighting together with isolux drawings
- Details to demonstrate that light spillage will not affect wildlife sensitive areas. This shall include plans illustrating retained or proposed features planned to be functionally used by bats for foraging/dispersal purposes

The scheme shall accord with the provisions of the Institution of Lighting [Guidance Note 08/23: Bats and Artificial Lighting at Night](#)

Lighting shall accord entirely with the details so approved for the duration of the construction phase of the development.

Justification: A lighting plan should be submitted to ensure lighting details are agreed prior to construction works and to reduce the impacts of lighting in the interest of protected species.

Natterjack toad, sand lizard and great crested newts

We note the detail provided within the Environmental Studies Report (Eni, Revision 2, June 2025) in respect of reptiles and amphibians. We note the report outlines the following mitigation:

5.6.2 'The protected species located within the Gronant Dunes habitats such as sand lizard, natterjack toad and great crested newt will be avoided by installing the HDD conduit under these dunes'.

We accept the above conclusion in respect of natterjack toad, great crested newt and sand lizard, but please see our comment in the Protected Sites section above regarding confirmation of the cable depth.

In the event of one or more GCN, natterjack toad and/or sand lizard being found within 50m of a working area, works must stop and must only commence on receipt of the appropriate licence issued by NRW under the provisions of the Conservation of Habitats and Species Regulations 2017 (as amended). We advise that this informative is included within any detailed CEMP produced for the works.

Schedule 1 birds (Wildlife and Countryside Act 1981, as amended)

We advise that as currently proposed, the works could cause disturbance to little tern. Little tern are listed on Schedule 1 of the Wildlife and Countryside Act 1981 (as amended); the birds, their nests, eggs and young are fully protected at all times throughout the UK. It is also an offence to intentionally or recklessly disturb little terns at an active nest site with eggs or young or before eggs are laid, or to disturb the dependent young.

Please see our advice in the Protected Sites section above regarding avoidance measures for disturbance of breeding little tern.

We also advise that similar pre-construction checks for the presence of Cetti's warbler (if suitable breeding habitat within 25m of the red line boundary would be disturbed during their nesting season) should be completed and accompanying mitigation measures for avoiding disturbance to these Schedule 1 species outlined in the detailed CEMP.

Contamination

Groundwater Management and Monitoring Plan (GWMMP)

The application site lies partially on Secondary A designated bedrock. We note the Environmental Studies Report (11/06/25) states the following:

5.7.4 'One possible consequence of the cable's shift eastwards is that it now brings the HDD directly beneath the dune slacks, which may impact upon hydrology within this area and the species this habitat supports. However, given the small diameter of the cable/conduit proposed, any impact is likely to be minimal and localised in extent.'

The CEMP (20/05/2025, Rev 00, 6.3.1) notes that the Lead Local Flood Authority advised that the groundwater table is likely to be high at this location.

We therefore reiterate our advice for the previous application (dated 23/08/23, application ref. FUL/000246/23) in that we would wish to be consulted on the Groundwater Management and Monitoring Plan, which would be implemented alongside the detailed CEMP, to be secured by condition attached to any planning permission granted. The proposed GWMMP should be informed by the detailed CEMP and include consideration of the following:

1. Drilling Fluid Escape (Inadvertent Return or "Frac-out")

Risk: Bentonite drilling fluids can escape into the dune matrix or groundwater if pressurised fluid finds a natural fissure or weak layer.

Potential issues:

- Dunes often have permeable, sandy substrates, increasing the risk of escape
- Fluids can smother vegetation or alter subsurface hydrology, affecting delicate root systems and species adapted to dry, low-nutrient soils

Potential mitigation:

- Perform a Frac-out Risk Assessment
- Conduct geotechnical boreholes to assess subsurface risk of frac-out
- Use real-time pressure monitoring and frac-out contingency plans (containment plus clean-up crews on stand-by)

- Post construction monitoring of fluid contamination or residual impacts

2. Impact from Cofferdam and Pit Dewatering

Risk: A 20m x 20m cofferdam and a 3m x 3m exit pit represent substantial excavation within a proximity to a dune system, even if temporary. (We note the indicative location of the exit pit on the proposed site plan (DWG NO. UK0029984.4176-PF.2.9-LAY-Sheet1) differs to the location shown within the CEMP and advise this detail is clarified)

Potential issues:

- Disturbance of stabilised dune vegetation leading to increased erosion risk
- Changes to groundwater levels if water is pumped from the pit of the cofferdam
- Possible introduction of non-native materials or contamination

Potential Mitigation:

- Locate the pit in an area of lowest ecological value, with expert habitat mapping support
- Use sheet piles or sacrificial mats to limit surface area affected
- Ensure dewatering discharge is controlled and filtered before entering adjacent land or waterbodies

We advise that a detailed CEMP is provided that includes information on how the potential risks outlined above will be managed and mitigated. The CEMP should include elements of the GWMMP and clarify how drilling fluid loss would be tracked, managed and reported. The detailed CEMP should also include a detailed method statement and environmental risk register from the contractor.

Water Framework Directive (WFD)

We note that the proposed changes to the cable route would not impact the conclusions of the original WFD compliance assessment submitted for planning permission FUL/000246/23 and therefore have no further comment on this aspect.

Other Matters

Please note, if further information is prepared to support an application, it may be necessary for us to change our advice in line with the new information.

The advice in this letter relates to matters which are included on our [consultation topics list](#). We do not rule out the potential for the proposed development to affect other environmental interests that are not included on this list.

In addition to planning permission, you are advised to ensure all other permits/consents/licences relevant to the development are secured. Please refer to our [website](#) for further details.

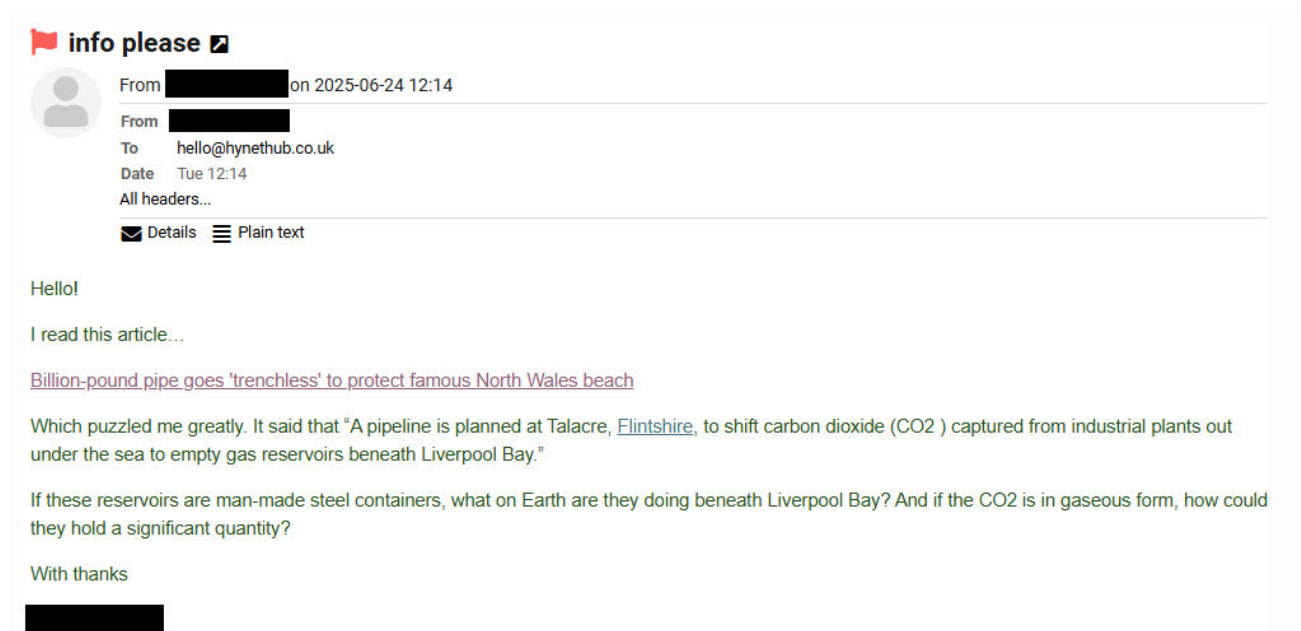
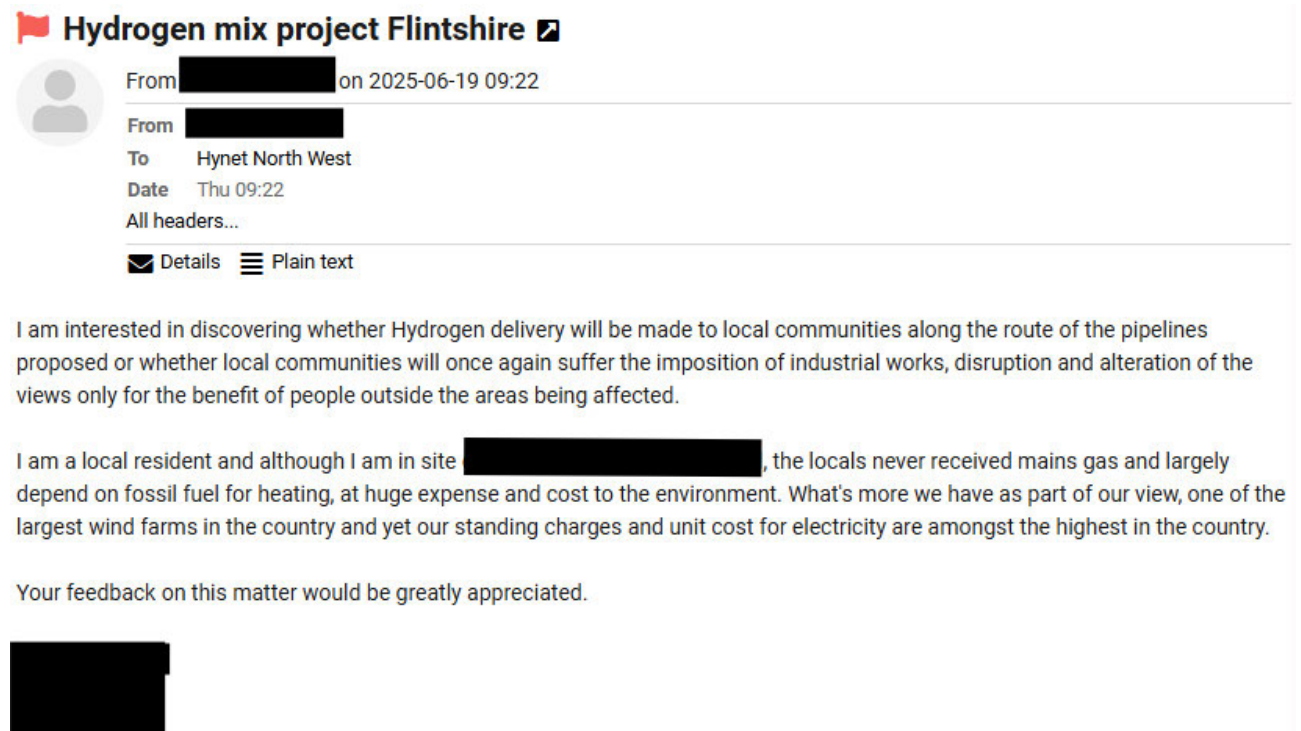
Further advice on the above matters could be provided prior to your planning application being submitted, however there would be a charge for this service. Additional details are available on our [website](#).

If you have any queries on the above, please do not hesitate to contact us.

Annex K

PUBLIC AND LANDOWNER RESPONSES

Figure K.1 – Email responses from the public



 Re: Launch of Pre-application Consultation for the Point of Ayr Cable Route Foreshore Works Proposed Development: 16 June – 14 July 2025



From [redacted] on 2025-07-08 09:55

 Details  Plain text

 Site Notice (English) - Hysbysiad Safle (Cymraeg).pdf (~1.5 MB) ▾

Hi Anna,

I run 2 tourism businesses on [redacted] and my sister a third right on the beach.

Can you confirm number of estimated truck movements for the work per day please and noise level forecasts.

Scheduling major works including the Easter holiday's is a massive no no, as we rely on positive trading at the beginning of the season to sustain us.

Look forward to hearing from you.

Best Regards,

[redacted]