Cyfoeth Naturiol Cymru
Natural Resources Wales

Environmental Impact Assessment Written Confirmation of the EIA Consent Decision

Marine Works (Environmental Impact Assessment) Regulations 2007 (as amended) ("the Regulations")

Hynet Carbon Dioxide Transportation and Storage Project, Liverpool Bay

CML2365

22 May 2025

Contents

1 Introduction

1.1 This document is the Environmental Impact Assessment ('EIA') Written Confirmation document for CML2365 Hynet Carbon Dioxide Transportation and Storage Project ("the Project").

2 The Project

2.1 Project Background

2.1.1 An application for a marine licence for the Project was submitted to NRW by Liverpool Bay CCS Ltd. and considered complete on 15 March 2024. The Proposed Development will repurpose the existing Eni offshore assets in Liverpool Bay to transport CO_2 from Point of Ayr (PoA) Gas Terminal to a newly constructed Douglas Carbon Capture and Storage (CCS) platform. CO_2 will then be distributed from the new Douglas platform to the Hamilton Main platform for injection into the Hamilton Main reservoir, to the Hamilton North platform for injection into the Hamilton North reservoir, and to the Lennox platform for injection into the Lennox reservoir. A series of new electrical and fibre optic cables will also be installed connecting the PoA Terminal to the offshore infrastructure.

2.1.2 The Project comprises of the following elements:

- installation of a new Douglas CCS platform to replace the existing Douglas Process platform to receive CO_2 from the onshore PoA Terminal and distribute CO_2 to the Hamilton Main, Hamilton North, and Lennox wellhead platforms and when necessary, provide heating. Installation of the new Douglas CCS platform will include up to eight driven piles;*
- installation of new topsides on the Hamilton Main, Hamilton North, and Lennox wellhead platforms to receive and inject CO_2 into the depleted hydrocarbon reservoirs;
- repurposing of the existing subsea natural gas pipelines for their change of use from hydrocarbon to CO_2 service;*
- installation of new sections of pipeline to connect the new Douglas CCS platform to the existing subsea natural gas pipelines;*
- development of the Hamilton Main, Hamilton North, and Lennox reservoirs for CO_2 storage through up to eight injection wells created by side tracking of existing production wells. This includes drilling and recompletion operations, all of which will be within the existing footprint (template) of each platform;
- implementation of a programme of Monitoring, Measurement and Verification (MMV) activities.* This includes the drilling of two new monitoring wells, one at Hamilton North and one at Hamilton Main.
- Additional monitoring wells will be created from the recompletion of existing wells within the existing footprint (template) of each platform: one monitoring well created by side-tracking an existing well in Lennox; and two sentinel wells, one in Hamilton North and one in Lennox; These sentinel wells will be existing wells within the existing footprint (template) of each platform that will be recompleted for additional reservoir monitoring. They will not have CO_2 resistant cement or

tubulars. As such, they will be Plugged and Abandoned (P&A) once the CO_2 front in the reservoir reaches them;
- installation, including trenching, and some dredging, of two submarine 33 kV armoured cables, with integrated fibre optic cable connections (35 km from PoA Terminal onshore to the new Douglas CCS platform, including within the intertidal/foreshore area up to MHWS, within Welsh waters only);*
- installation, including trenching, of new power cables with integrated fibre optic (FO) connecting the new Douglas CCS platform with the Hamilton Main (12 km; 33 kV), Hamilton North (15 km; 33 kV) and Lennox (35 km; 33 kV) platforms; and*
- installation of concrete mattresses and external cable protection, at crossings of existing cables, and in areas where cable burial is not deemed feasible, or as a remedial secondary protection measure if the target cable depth of lowering cannot be achieved.*

2.1.3 All activities listed in 2.1.2 with a * require a marine licence under Part 4, (Chapter 1) Section 66 of the Marine and Coastal Access Act.

2.2 Location

2.2.1 The Project is located in the Irish Sea, approximately 12 km to the north of the Welsh coastline and 2 km west of the English coastline. The Project area covers approximately 576.82 km^2 and encompasses the depleted hydrocarbon reservoirs of the Hamilton Main, Hamilton North, and Lennox fields. The Project infrastructure will be located within the Eni CO_2 Appraisal and Storage Licence area CS004 and the pipeline and cable corridor connecting the Point of Ayr (PoA) gas Terminal (up to Mean High Water Springs (MHWS) to the new Douglas Offshore Platform.

2.3 Statement of need

2.3.1 HyNet Project aims at reducing the amount of CO_2 emitted from across the North West industrial cluster region starting by locking away the CO_2 emitted by heavy industry in the region.

2.3.2 The Applicant, Liverpool Bay CCS Limited, is an affiliate company to Eni UK Limited (Eni) which is a leading partner of the Consortium delivering the HyNet North West Project. The HyNet North West Project will reduce CO_2 emissions from industry, homes, and transport and support economic growth in the North West of England and North Wales. The objective of the offshore components of the Project is to repurpose the existing offshore natural gas import pipeline from Point of Ayr (PoA) Gas Terminal to become a CO_2 export pipeline and transport the CO_2 to the newly constructed Douglas CCS platform. From the new Douglas CCS platform, CO_2 will be transported for storage into the depleted reservoirs, the Hamilton Main reservoir, the Hamilton North reservoir, and the Lennox reservoir.

2.4 Regulating regimes

2.4.1 The Project overlaps between the following consenting regimes.

a) A marine licence under the Marine and Coastal Access Act 2009, administered by Natural Resources Wales acting on behalf of the Licensing Authority, Welsh Ministers. Aspects applied for via a marine licence are identified by * in the list above.
b) A Pipeline Works Authorisations under Petroleum Act 1998 (administered by the North Sea Transition Authority (NSTA)) for new inter-platform electrical and fibre optic cables in England
c) A Storage Permit from the NSTA and Offshore Petroleum Regulator for Environment and Decommissioning (OPRED), in accordance with the Storage of Carbon Dioxide (Licensing etc.) Regulations 2010 for the storage of carbon dioxide at a storage site in the licensed area (CS004).

3 Environmental Impact Assessment

3.0.1 Council Directive 2011/92/EU (as amended) on the assessment of the effects of certain public and private projects on the environment ("the EIA Directive") aims to protect the environment and the quality of life by ensuring that projects which are likely to have significant environmental effects by virtue of their nature, size or location are subject to an EIA before permission is granted.

3.0.2 The Marine Works (Environmental Impact Assessment) Regulations 2007 (as amended) ("the Regulations") transpose the EIA Directive in Wales and England for marine licence applications.

3.0.3 Pursuant of Regulation 7 of the Regulations, Natural Resources Wales (NRW) considered under SC2501 that the proposed works fall under Schedule A1, para 23 and 29 of the Regulations, specifically:

23. Pipelines with a diameter of more than 800 millimetres and a length of more than 40 kilometres for the transport of—
a) gas, oil or chemicals;
b) carbon dioxide streams for the purposes of geological storage, including associated booster stations.

29. Storage sites pursuant to Directive 2009/31/EC(**3**) of the European Parliament and of the Council on the geological storage of carbon dioxide.

3.0.4 Accordingly, the marine licence application required for the Project was accompanied by an Environmental Statement (ES).

3.1 The Environmental Statement (ES)

3.1.1 The Environmental Statement outlined the proposed project organised under the following topic headings

3.1.2 Technical chapters:

1	Introduction
2	Policy and Legislative Context
3	Proposed Development Description
4	Site Selection and Consideration of Alternatives
5	Environmental Impact Assessment Methodology
Volume 2 – Offshore ES Main Report	
6	Physical Processes
7	Marine Biodiversity
8	Ornithology
9	Shipping and Navigation
10	Commercial Fisheries
11	Marine Archaeology
12	Infrastructure and Other Sea Users
13	Climate Change
14	Inter-Related Effects
Volume 3 – Appendices and Technical reports	
Appendix A	Scoping Report
Appendix B	Scoping Opinion
Appendix C	Topics scoped out of assessment
Appendix C1	Air Quality Technical Report
Appendix C2	Aviation and Radar Technical Report
Appendix C3	Seascape, Landscape and Visual Impact Assessment Technical Report
Appendix D	Marine Plan policies
Appendix E	Enhancement, Mitigation and Monitoring Commitments
Appendix F	Cumulative Effects Appendix
Appendix G	Transboundary Impacts Screening
Appendix H	Physical Processes Technical Report
Appendix I	Marine Biodiversity Technical Reports
Appendix I1	Marine Biodiversity Subtidal Survey Report
Appendix I2	Marine Biodiversity Intertidal Survey Report
Appendix J	Underwater Noise Technical Report
Appendix K	Ornithology Technical Reports
Appendix K1	Offshore Ornithology Baseline Technical Report
Appendix K2	Offshore Ornithology Displacement Technical Report
Appendix K3	Intertidal Ornithology Technical Report
Appendix K4	Little Tern Foraging Distribution Technical Report
Appendix L	Navigational Risk Assessment (NRA) Report
Appendix M	Commercial Fisheries Technical Report
Appendix N	Marine Archaeology Technical Report
Appendix O	Greenhouse Gas Assessment
Appendix P	Report to Inform Appropriate Assessment (RIAA)
Appendix Q	Water Framework Directive (WFD) Report
Volume 4 – Outline Management Plans	
Appendix R	Environnemental Management Plan (EMP)
Appendix S	Marine Mammal Mitigation Protocol (MMMP)
Appendix T	Invasive Non-Native Species (INNS) Plan
Appendix U	Written Scheme of Investigation (WSI) and Protocol for Archaeological Discoveries (PAD)

3.1.3 A full list of documents submitted can be found on Annex 1.

3.1.4 The ES is considered to satisfy the requirements of Regulation 12 (2) and Schedule 3 of the Regulations. Specific comments pertinent to each ES chapter can be found in section 7.

3.2 Other Legislative and Policy Framework

3.2.0 Relative considerations under other legislation and / or policy are set out below:

3.2.1 Water Framework Directive (Council Directive 2000/60/EC)

3.2.1.1 The sea from the mean low water mark up to 1 nautical mile from shore is protected under the WFD which requires a project or activity does not cause or contribute to deterioration in status of European Union (EU) water bodies or 'prevent the water body achieving 'good status.

3.2.1.2 The Potential effect of the Project was also screened against the Water Framework Directive objectives for the following Water Bodies:

- (GB641011650000) North Wales – Coastal Water Body
- (GB531106708200) Dee (N. Wales) – Transitional Water Body

3.2.1.3 A Water Framework Directive Compliance Assessment was concluded that the proposal, when considered alone and in-combination, will not pose a risk to deterioration of the above listed waterbodies or prevent the water bodies from meeting its objectives.

3.2.1.4 Further details are described within the Water Framework Directive Compliance assessment.

3.2.2 Waste (England and Wales) Regulations 2011 (2011/988)

3.2.2.1 'Establishes a legal framework for treating waste in the EU. This is designed to protect the environment and human health by emphasising the importance of proper waste management, recovery and recycling techniques to reduce pressure on resources and improve their use.' Waste generated by a project or activity must be dealt with in an environmentally friendly way. To do this it applies the waste hierarchy from the Waste Regulations, which gives an order of preference for how waste is dealt with (prevention, re-use, recycling, recovery, disposal at sea).

3.2.2.2 See consideration under section 7

3.2.3 The Conservation of Habitats and Species Regulations 2017 (as amended)

3.2.3.1 European sites are those designated under The Conservation of Habitats and Species Regulations 2017 (as amended) ("Habitats Regulations") as Special Protection Areas ("SPAs"), Special Areas of Conservation ("SACs") or Sites of Community Importance ("SCIs").

3.2.3.2 The proposal is located within the Liverpool Bay SPA and the Dee Estuary SAC, SPA.

3.2.3.3 This Habitats Regulations Assessment (HRA) considers the licensable activities associated with the marine licence in Welsh Waters as detailed above. In line with Regulation 67(2) of The Conservation of Habitats and Species Regulations 2017,

this HRA does not consider the works falling outside the marine licence application, as these will be assessed as part of the HRA conducted by another Competent Authority (e.g., the Offshore Petroleum Regulator for Environment and Decommissioning, OPRED). Neither is there detailed consideration of decommissioning activities as part of this HRA as this is an assessment that will be conducted at the time consent for the decommissioning activity is sought.

3.2.3.4 The effects of the marine licensable activities as in (section 2.1) of the Project on the following European Sites, their features and conservation objectives have been considered by NRW during the licence determination:

- Dee Estuary/Aber Dyfrdwy SAC (hereinafter referred to as Dee Estuary SAC) [UK0030131];
- River Dee and Bala Lake/Afon Dyfrdwy a Llyn Tegid SAC (hereinafter referred to as River Dee and Bala Lake SAC) [UK0030252];
- Afon Gwyrfai a Llyn Cwellyn SAC [UK0030046];
- Afon Eden - Cors Goch Trawsfynydd SAC [UK0030075];
- River Teifi/Afon Teifi SAC (hereinafter referred to as River Teifi SAC) [UK0012670];
- North Anglesey Marine/Gogledd Môn Forol SAC (hereinafter referred to as North Anglesey Marine SAC) [UK0030398];
- North Channel SAC [UK0030399];
- Lleyn Peninsula and the Sarnau SAC [UK0013117];
- West Wales Marine SAC [UK0030397];
- Strangford Lough SAC [UK0016618];
- Murlough SAC [UK0016612];
- Cardigan Bay/Bae Ceredigion SAC (hereinafter referred to as Cardigan Bay SAC) [UK0012712];
- The Maidens SAC [UK0030384];
- Pembrokeshire Marine/Sir Benfro Forol SAC (hereinafter referred to as Pembrokeshire Marine SAC) [UK0013116];
- Bristol Channel Approaches/Dynesfeydd Môr Hafren SAC (hereinafter referred to as Bristol Channel Approaches SAC) [UK0030396];
- Lundy SAC [UK0013114];
- Rockabill to Dalkey Island SAC [IE0003000];
- Saltee Islands SAC [IE000707];
- Roaringwater Bay and Islands SAC [IE000101];
- Liverpool Bay/Bae Lerpwl SPA (hereinafter referred to as Liverpool Bay SPA) [UK9020294];
- Dee Estuary SPA [UK9013011];
- Ribble and Alt Estuaries SPA [UK9005103];
- Anglesey Terns/Morwenoliaid Ynys Môn SPA (hereinafter referred to as Anglesey Terns SPA) [UK9013061];
- Morecambe Bay and Duddon Estuary SPA [UK9020326];
- Aberdaron Coast and Bardsey Island/Glannau Aberdaron ac Ynys Enlli SPA (hereinafter referred to as Aberdaron Coast and Bardsey Island SPA) [UK9013121];
- Ailsa Craig SPA [UK9003091];

- Skomer, Skokholm and the Seas off Pembrokeshire/Sgomer, Sgogwm a Moroedd Penfro SPA (hereinafter referred to as Skomer, Skokholm and the Seas off Pembrokeshire SPA) [UK9014051];
- Grassholm SPA [UK9014041], and
- Saltee Islands SPA [IE0004002].

3.2.3.5 A test of likely significant effect (TLSE) was undertaken and potential significant effects on features of the European Sites listed above could not be ruled out. After mitigation, such as the development and adherence to a Construction Environmental Management Plan (CEMP); a Marine Mammal Mitigation Protocol (MMMP), and a Vessel Management Plan (VMP), no adverse effects on the integrity of any European sites is expected. Therefore, in light of the conclusions of an appropriate assessment and, having had regard to any advice received from the appropriate nature conservation bodies (ANCBs: JNCC, Natural England and NRW), it has been established that the plan or project will not adversely affect the integrity of any European site (s) concerned.

3.2.3.6 Further details are described within the Habitats Regulations Assessment.

3.2.4 Marine Conservation Zones

3.2.4.1 Section 116 of the Act provides powers to Welsh Ministers to designate Marine Conservation Zones ("MCZs") with the aim of contributing to the achievement of a network of ecologically coherent and well-managed marine protected areas.

3.2.4.2 The Project does not overlap within a Marine Conservation Zone or would have an impact on a MCZ in Wales.

3.2.4.3 The proposed development could impact the following MCZs in England:

- West of Walney MCZ (28.73 km) designated for Subtidal sand (A5.3), Subtidal mud (A5.3), and Sea-pen and burrowing megafauna communities (OSPAR list of threatened or declining habitats)..
- West of Copeland MCZ (47.13 km) designated for subtidal coarse sediments (A5.1), subtidal sand (A5.2), and subtidal mixed sediments (A5.4)
- Fylde MCZ (0 km) designated for subtidal sand (EUNIS Habitat A5.3) and subtidal mud (A5.3). These habitats are highly productive and have been shown to support diverse bivalve mollusc populations, including species the nut shell *Nucula nitidosa*, razor shell *Pharus legumen* and white furrow shell *Abra alba*.

3.2.4.4 The impacts of the Project to English MCZs has been conducted by OPRED and summarised as follows. No infrastructure will be installed within the Fylde MCZ and therefore no loss or alterations of features within the MCZ will occur. A small area of the subtidal habitats present within the Fylde MCZ may be disturbed by the proposed trenching activities but no significant adverse effect on the sites integrity or hinder the achievement of the conservation objectives of MCZ is expected. No credible pathways are expected to the West of Walney or West of Copeland MCZ.

3.2.4.5 Further information regarding the conclusions of the OPRED assessment are in the Notice under regulation 14(5) of decision ES/2022/009 of 17 March 2025.

3.2.5 Wildlife and Countryside Act 1981 (as amended)

3.2.5.1 Sites of special scientific interest ("SSSIs") are protected by law to conserve their wildlife or geology. The Wildlife and Countryside Act 1981 (as amended) ensures that SSSIs are protected and managed effectively.

3.2.5.2 The effects of the Proposed Development on the following SSSI was considered and no significant impacts identified:

- Gronant Dunes and Talacre Warren;
- Dee Estuary;
- North Wirral Foreshore;
- Ribble Estuary, and
- Sefton Coast.

3.2.5.3 See consideration under section 7

3.2.6 Marine Policy Statement and Welsh National Marine Plan

3.2.6.0 The UK Marine Policy Statement ("MPS") is the framework for preparing Marine Plans and taking decisions affecting the marine environment. NRW must make licensing decisions in accordance with the MPS and the Welsh National Marine Plan unless relevant considerations indicate otherwise.

3.2.7 Environment (Wales) Act 2016

3.2.7.1 Article 4 of the Natural Resources Body for Wales (Establishment) Order 2012, as amended by the Environment (Wales) Act 2016 requires NRW to pursue the sustainable management of natural resources in relation to Wales, and apply the principles of sustainable management of natural resources in the exercise of its functions, so far as consistent with their proper exercise.

3.2.7.2 NRW considers that the procedures outlined in this Written Confirmation in the consideration of EIA consent are consistent with this requirement.

3.2.8 Well-being of Future Generations (Wales) Act 2015

3.2.8.1 This Act requires NRW, as a public body, to take reasonable steps in exercising its functions to work in accordance with the sustainable development principle, as set out in Section 5 of the Act.

3.2.8.2 NRW considers that that the EIA process is consistent with the sustainable development principle described in the Act, and that the processes outlined in this Written Statement are sufficient to properly demonstrate the sustainable development principle. In particular, NRW acknowledges that the principles of sustainable management include taking account of all relevant evidence and gathering evidence in respect of uncertainties, and taking account of the short, medium and long term consequences of actions. NRW further acknowledges that is it an objective of sustainable management to maintain and enhance the resilience of ecosystems and the benefits they provide and, in so doing meet the needs of present generations of people without compromising the ability of future generations

to meet their needs, and contribute to the achievement of the well-being goals in section 4 of the Well-being of Future Generations (Wales) Act 2015.

3.3 Further Information provided by the Applicant pursuant to a notification under regulation 14(1)

3.3.1 Further Information was requested from the Applicant pursuant to a notification under Regulation 14(1).

3.3.2 In accordance with Regulation 14(1), NRW considered that further information was required to come to a conclusion on, the likely significant environmental effects of the project.

3.3.3 Further Information on a variety of topics was requested from the Applicant on 12 June 2024.

3.3.4 A full list of documents submitted on 26 July 2024 following the Further Information request can be seen in Annex 1.

3.3.5 Further information was also submitted on 05 and 07 February 2025 following a proposed change to the cable route. The documents submitted can be seen in Annex 1

3.3.6 Pursuant to Regulations 16 and 17 of the Regulations, consultation with the public and technical consultees was carried out on the further information submission, see Section 4 and 6.

4 Consultation with the public

4.1 Public Notices

4.1.1 Pursuant to Regulation 16, public notices were advertised to notify interested parties of the proposed works and give any interested parties or members of the public an opportunity to make representation on the application as necessary.

4.1.2 The application documents were made available to the public as follows;

- A translated public notice was placed in the Daily Post on 12 and 19 of April 2024
- The application documents were made available to the public at: Flint Library Church Street, Flint, CH6 5AP for 42 days following the publication of the first public notice. The application documents were also available on NRW online public register.

4.1.3 Three public representations were received to this public consultation.

4.1.4 Following the submission of Further Information on 26 July 2024, as detailed in section 3.3.4, public notices were advertised to notify interested parties of the Further Information submission and give them an opportunity to make a representation as necessary.

4.1.5 Further Information documents were made available as follows:

- A translated public notice was placed in the Daily Post on 12 and 19 of August 2024
- The application documents were made available to the public at: Flint Library Church Street, Flint, CH6 5AP for 42 days following the publication of the first public notice. The application documents were also available on NRW online public register.

4.1.6 No public representations were received to this Further Information consultation.

4.1.7 A change to the cable route approach to Point of Ayr Gas Terminal was received on 05 February 2025. The amendment to the marine licence application ("Realignment") was considered additional information requiring public consultation under Regulation 16. The documents supporting the Realignment were advertised through public notices to notify interested parties of the route change and give any interested parties or members of the public an opportunity to make representation on the Realignment as necessary.

4.1.8 Realignment documents were made available as follows:

- A translated public notice was placed in the Daily Post on 17 and 24 February 2025.
- The application documents were made available to the public at: Flint Library Church Street, Flint, CH6 5AP for 42 days following the publication of the first public notice. The application documents were also available on NRW online public register.

4.1.9 No public representations were received to this Realignment consultation.

4.1.10 All representations received from members of the public were dealt in accordance to Schedule 5 of the Regulations.

4.1.11 Representations capable of being dealt with according to Schedule 5 of the Regulations are further described in section 7 of this decision.

5 Consultation of EEA States

5.0.1 A Transboundary Screening Assessment did not identify potential for effects to any other EEA State.

5.0.2 Consequently, no material was provided to other EEA member States in relation to the application

6 Technical consultation

6.0.1 The marine licence application was consulted upon on 03 April 2024 for a period of 42 days, in accordance with Regulation 17 of the regulations. It was sent to the following consultation bodies:

Consultee	Response date
The Crown Estate (TCE)	26 April 2024
NRW Advisory (NRW A)	14 May 2024
Ministry of Defence - Safeguarding Defence (MoD)	23 May 2024
Maritime & Coastguard Agency (MCA)	14 May 2024
Trinity House (TH)	14 May 2024
Royal Yachting Association (RYA)	No response received
Local Biodiversity Officer	No response received
Local Planning Authority (Flintshire)	No response received
Local Harbour Authority (Dee Conservancy)	08 May 2024
Local Port Authority - Port of Mostyn (PoM)	13 May 2024
Welsh Fisherman Association	No response received
National Federation of Fishermen's Organisations (NFFO)	No response received
Royal Society for the Protection of Birds (RSPB)	No response received
Welsh Government (WG) Marine and Fisheries Division/ Welsh Government (WG) Marine Enforcement Officers	07 May 2024
Cadw	07 May 2024
Welsh Archaeological Trusts (The Clwyd-Powys Archaeological Trust, CPAT)	09 April 2024
Royal Commission on the Ancient and Historical Monuments of Wales (RCAHMW)	10 May 2024
Public Health Service Wales (PHW)	08 May 2024
Environment Agency (EA)	No response received
Chamber of Shipping	No response received
NERL Safeguarding	No response received
North Western Inshore Fisheries Conservation Authority (NWIFCA)	22 April 2024
JNCC	14 May 2024
Natural England (NE)	13 May 2024
Cockle Fisheries Dee Estuary NRW	No response received

6.0.2 Following the submission of Further Information on 26 July 2024, the Further Information documents were consulted upon on 12 August 2024 for a period of 42 days, in accordance with Regulation 17 of the regulations. It was sent to the following consultation bodies:

Consultee	Response date
The Crown Estate (TCE)	No response received
NRW Advisory (NRW A)	23 September 2024
Ministry of Defence - Safeguarding Defence (MoD)	03 September 2024
Maritime & Coastguard Agency (MCA)	26 September 2024

Trinity House (TH)	25 September 2024
Royal Yachting Association (RYA)	No response received
Local Biodiversity Officer	No response received
Local Planning Authority (Flintshire)	No response received
Local Harbour Authority (Dee Conservancy)	13 September 2024
Local Port Authority - Port of Mostyn (PoM)	09 September 2024
Welsh Fisherman Association	No response received
National Federation of Fishermen's Organisations (NFFO)	No response received
Royal Society for the Protection of Birds (RSPB)	No response received
Welsh Government (WG) Marine and Fisheries Division/ Welsh Government (WG) Marine Enforcement Officers	16 August 2024
Cadw	10 September 2024
Welsh Archaeological Trusts (The Clwyd-Powys Archaeological Trust, CPAT)	13 August 2024
Royal Commission on the Ancient and Historical Monuments of Wales (RCAHMW)	14 August 2024
Public Health Service Wales (PHW)	20 August 2024
Environment Agency (EA)	No response received
Chamber of Shipping	23 September 2024
NERL Safeguarding	No response received
North Western Inshore Fisheries Conservation Authority (NWIFCA)	14 August 2024
JNCC	23 September 2024
Natural England (NE)	23 September 2024
Cockle Fisheries Dee Estuary NRW	16 September 2024

6.0.3 Further Clarification was requested by NRW on 11 October 2024 and submitted by the applicant on the 06 November 2024, documents submitted as part of the clarification request can be seen in Annex 1. NRW consulted on the further clarifications on the 06 November 2024 with the bodies listed in the table below due to their particular expertise in matters arising in relation to this clarifications. These bodies were consulted for a period of 35 days:

Consultee	**Response date**
NRW Advisory (NRW A)	19 November 2024 and 16 January 2025
Local Port Authority (Port of Mostyn)	10 December 2024
Environment Agency (EA)	12 November 2024
JNCC	19 November 2024
Natural England (NE)	19 November 2024

6.0.4 Further Information relating to The change to the cable route approach to Point of Ayr Gas Terminal received on 05 February 2025 was consulted upon on 11

February 2025 for a period of 42 days, in accordance with Regulation 17 of the regulations. It was sent to the following consultation bodies:

Consultee	Response date
The Crown Estate (TCE)	06 March 2025
NRW Advisory (NRW A)	17 March 2025
Ministry of Defence - Safeguarding Defence	24 March 2025
Maritime & Coastguard Agency (MCA)	24 March 2025
Trinity House (TH)	27 March 2025
Royal Yachting Association (RYA)	21 March 2025
Local Biodiversity Officer	No response received
Local Planning Authority (Flintshire)	No response received
Local Harbour Authority (Dee Conservancy)	No response received
Local Port Authority - Port of Mostyn (PoM)	14 February 2025
Welsh Fisherman Association	No response received
National Federation of Fishermen's Organisations (NFFO)	No response received
Royal Society for the Protection of Birds (RSPB)	No response received
Welsh Government (WG) Marine and Fisheries Division/ Welsh Government (WG) Marine Enforcement Officers	25 March 2025
Cadw	19 March 2024
Welsh Archaeological Trusts (The Clwyd-Powys Archaeological Trust, CPAT)	12 February 2025
Royal Commission on the Ancient and Historical Monuments of Wales (RCAHMW)	14 February 2025
Public Health Service Wales (PHW)	14 February 2025
Environment Agency (EA)	No response received
Chamber of Shipping	No response received
NERL Safeguarding	12 February 2025
North Western Inshore Fisheries Conservation Authority (NWIFCA)	21 February 2025
JNCC	24 March 2025
Natural England (NE)	20 February 2025
Cockle Fisheries Dee Estuary NRW	No response received

6.0.5 Details of the issues raised by the Consultation Bodies and how they have been addressed is set out in section 7.

6.0.6 Consultees who did not provide a response were assumed to have no comment

7 Issues arising during the consideration of the Environmental Statement, Marine Licence Application and representations received

7.0.1 Material issues that were highlighted by the ES and consultation process and the extent to which they have been addressed are detailed in this section.

7.1 Environmental Impact Assessment approach

7.1.1 Natural England (NE) advises that all of projects under HyNet Carbon Dioxide Transportation and Storage Project should be considered a single project for the purposes of the Environmental Impact Assessment (EIA) Regulations. The Applicant points out that the Planning Inspectorate has already assessed this request by NE as part of the Planning Permission which was granted on 16 January 2024 (Planning Permission reference FUL/000633/23). NRW agrees with the Applicant that the components of the HyNet Carbon Dioxide Transportation and Storage Project can be considered as distinct projects with a consortium of partners to facilitate the transportation of CO_2 from various emitters to offshore storage. All components of the Project have been considered as EIA projects and consider the cumulative effects of the constituent parts as part of the cumulative assessment. In addition, the Applicant has prepared as part of the Further Information a report evaluating the environmental effects of the Project as a whole (*CML2365 HyNet Project-wide Environmental Effects Report Further Information*). NRW is satisfied with this approach..

7.2 Archaeology

7.2.1 The CPAT raised the possible impact to WWII pillboxes at Talacre Beach on the foreshore. NRW note that this issue is controlled through condition 11 of the Planning Permission (FUL/000633/23) which requires a pre-construction walkover of the access track along Talacre Beach to avoid impacts by the Proposed Development. NRW therefore consider the risk sufficiently controlled and that there is no need to duplicate the requirement within the marine licence.

7.2.2 Cadw and the RCAHMW raised concerns regarding the Designated Wreck of the Resurgam which under the Protection of Wrecks Act 1973 has a statutory protection area of 300m surrounding it. The Applicant noted in their Further Information (*CML2365 Consultation log to applicant-Rev_2.0.26.07.2024 Further Information*) response that the cable route was designed to avoid the Resurgam wreck and leave enough space for cable installation and maintenance to occur outside the statutory protected area. Concerns were also raised by CPAT regarding the protection of other wrecks and archaeological sites, known or identified during the works. The applicant proposed mitigation through production and adherence to a Written Scheme of Investigation (WSI) that would include but not be limited to a Protocol for Archaeological Discoveries (PAD) and establishment of Archaeological Exclusion Zones (AEZ) . RCAHMW agreed with the proposed methodology for the selection of AEZs. The RCAHMW is satisfied with the commitment to continuous engagement with them as Archaeological Curators and Data Archive Centre for MEDIN repository. NRW is satisfied that subject to production and adherence to a WSI and PAD which accords with the draft WSI (*CML2365-LBA CCS Ltd_OFFSHORE ES_Appendix U WSI_NRW_FINAL.pdf*) that no significant effect on the historic environment is predicted as a result of the Project. NRW consider that mitigation can be secured through licence conditions requiring final WSI for approval prior to commencement of any licensed activities.

7.3 Physical Processes

7.3.1 NE and NRW A requested a qualitative assessment of the future baseline environment in response to natural change, based on environmental information and scientific knowledge. The Applicant provided justification for the approach taken in their Further Information submission (*CML2365 WAE02282_TN_Physical_Processes_Rev01a Further Information*). The Applicant indicated that due to the degree of natural variability in the short and long term across the study area, the future baseline scenario under natural change and the post-construction scenario (in terms of physical processes) are indistinguishable. In addition, the impact on physical processes would be reduced through avoidance of the West Hoyle Split. No further comments were received. NRW is satisfied with this response and considers that a further assessment on future baseline is no longer necessary.

7.3.2 Although cable protection for cable crossing areas is part of the application, NE queried whether additional cable protection would be required outside the cable crossings. This issue was also raised in relation to Benthic Ecology by NE and NRW A. The Applicant indicated that their preferred cable protection is informed by studies undertaken in support of the Project (*CML2365 - OFFSHORE POWER CABLE PROTECTION REQUIREMENT-1025H0BSRV84107_CDFE06_43),* which utilises both qualitative and quantitative approaches to assess the various hazards that could potentially affect the integrity of subsea cables, and represents an initial Cable Burial Risk Assessment (CBRA). This study identified that the cables would require to be buried to a target depth of 2-3m and need only be protected using external protection (e.g. concrete mattresses, and rock berms) at third-party crossings of other cables. NRW is satisfied that the risk can be fully mitigated through the submission of a final CBRA for approval to the Licensing Authority. The Applicant has been made aware that the requirement of any additional cable protection during the lifetime of the Project will require a new marine licence.

7.3.3 NE requested further information on proposed monitoring specifications of cable protection which should review recoverability of the seabed from cabling work. The Applicant indicated in the Further Information (*CML2365 Consultation log to applicant-Rev_2.0.26.07.2024 Further Information*) that the preferred form of cable protection is cable burial and that a Monitoring Plan of assets integrity will be a requirement of the NSTA Storage Permit Application (informed by OPRED Decision Letter ES/2022/009). This Monitoring Plan continues with the monitoring currently carried out for the existing operational infrastructure on an annual basis and will include monitoring of external cable protection and new electrical cable. NRW therefore consider the risk of cable exposure is controlled through conditions to the NSTA Storage Permit and that there is no need to duplicate the requirement within the marine licence.

7.3.4 NRW A raised their concerns regarding the intended removal of West Hoyle Sandbank and the implications to coastal protection and secondary impacts to the Dee Estuary SAC/SPA/SSSI and associated cockle beds. This comment was also raised in relation to implication of removal of the sandbank on water quality and benthic ecology. The Applicant clarified in their Further Information (*CML2365 Consultation log to applicant-Rev_2.0.26.07.2024 Further Information*) that the

reference to West Hoyle Sandbank was an error and it should have referred to West Hoyle Split. The Applicant also confirmed that the worst-case route option, across the West Hoyle Spit, will no longer be pursued. The alternative option to the east will be taken forward which avoids the excavation of the trench across the Spit resulting in a reduced worst-case scenario. Suspended sediment concentrations and sedimentation associated with the trench excavation is therefore not predicted to reach the Dee Estuary SAC/SPA/SSSI and associated cockle beds. No further comments were received from ANCBs. NRW is satisfied with the response and considers the matter resolved.

7.3.5 NE and NRW A raised concerns regarding the cumulative impact assessment (CIA) in relation to the projects included in the assessment and the worst-case scenario applied. The Applicant provided further details as part of the Further Information **(***CML2365 WAE02282_TN_Physical_Processes_Rev01a Further Information)* clarifying that the zone of impact on physical processes for the Proposed Development (SSC, water quality, and seabed morphology) was used to identify the relevant projects to be included in the CIA. This resulted in the inclusion of marine aggregate extraction Area 457 and the conclusion that cumulative SSC and sedimentation would not extend to any of the designated areas or relevant qualifying interests for the physical processes assessment. NRW A also raised concerns regarding the worst-case scenario and perceived lack of inclusion of Mostyn Energy Park Expansion (MEPE) intention to dredge to -5m CD. This was later clarified by Port of Mostyn (PoM) as the intention to dredge in the Outer Welsh Channel rather than the MEPE. The MEPE Project full permitted dredge depth of -4CD has been accounted for in the CIA as the worst-case scenario. The inclusion of the Outer Welsh Channel intention to dredge to -5mCD is not considered by NRW to be necessary as PoM, the Statutory Harbour Authority for the Outer Channel, will be required to submit a marine licence application prior to conducting such dredging. NRW therefore considers that the CIA is sufficient to evaluate the cumulative impacts of plans and projects on physical processes.

7.3.6 NRW A requested clarification on the correct amount of subsea power cable to be installed and associated cable protection to ensure that the worst-case scenario has been accounted for. The Applicant provided further clarity in the Further Information (*CML2365 WAE02282_TN_Physical_Processes_Rev01a Further Information*) and Clarification (*CML2365 Further Clarification response November 2024*), which showed that the worst-case scenario had been accounted for. NRW therefore consider the matter resolved.

7.3.7 NRW A raised the lack of consideration for possible cable protection requirements during operation and maintenance phase of the Proposed Development. The Applicant indicated that the studies undertaken to inform the proposal included sediment mobility studies and geological ground models which combined with site specific survey data have informed the preferred cable protection as burial. NRW considers should it become apparent that cable protection is required at the operation and maintenance phase of the Proposed Development due to the cables becoming exposed, the Applicant will need to request a further marine licence for cable protection works. NRW therefore considers the matter resolved.

7.3.8 NRW A requested clarification as to whether the Applicant's commitment not to reduce water depth more than 5% will be achievable when cable protection is

placed in shallower waters. NRW A stressed where cable protection was required that low profile cable protection would help reduce changes to wave, tide and sediment transport and requested clarification on the approach to cable (and pipeline) protection particularly in shallow waters. The Applicant provided further clarity within the Further Information (*CML2365 Consultation log to applicant-Rev_2.0.26.07.2024 Further Information*) indicating their commitment to produce al Cable Specification and Installation Plan (CSIP) and Pipeline Specification and Installation Plan (PISP) post consent to detail the cable/pipeline burial and protection specifications and ensured that crossings will be appropriately designed to mitigate environmental effects. NRW A were satisfied with the information and approach provided, and concluded there were no significant concerns with regards to the potential impacts to seabed morphology or sediment transport processes. NRW is satisfied that subject to production and adherence to a CSIP and PISP that significant impact on physical processes are not predicted.

7.3.9 NRW A initially advised that further consideration was required surrounding potential impacts on Annex I Estuaries feature of the Dee Estuary SAC due to increased SSC and sediment deposition as modelling results included in the ES show the predicted sediment plume and sedimentation rates to reach into the estuary. However, the Applicant provided further assessment as part of the Further Information submission (*CML2365 MC000025_TN_Fish_MBTN02_Rev02 Further Information*) showing a negligible impacts of SSCs and associated deposition on the Dee Estuary particularly when considering that the trench excavation through the West Hoyle Split will no longer be pursued. NRW A were satisfied with the response. NRW therefore considers the matter resolved.

7.4 Benthic Ecology

7.4.1 NE queried the approach for defining the Zone of Influence (ZoI) with regards to benthic receptors. The Applicant clarified that a ZoI has been defined for each pressure and impact. For increased SSC and associated deposition, the ZoI is determined by the physical processes as described in the ES (e.g., *CML2365-LBA CCS Ltd_ES_Appendix H_PP TR_NRW_FINAL*). No further comments were received from NE on this matter. NRW therefore considers the matter resolved.

7.4.2 NE requested that the impacts of unexploded ordnance (UXO) clearance is assessed for benthic receptors as it has a potential to generate significant disturbance/damage to habitats and species, particularly through the formation of craters resulting in habitat loss and/or disturbance. The Applicant submitted as part of the Further Information an assessment of the impacts of UXO clearance (*CML2365 MC000025_TN_Benthic_MBTN01_Rev02 Further Information*), concluding that the impact as a result of UXO clearance does not change the assessment for temporary habitat loss/disturbance to subtidal and intertidal benthic ecology which is which is assessed as not significant in EIA terms. No further comments were received from NE. NRW therefore considers the matter resolved.

7.4.3 NE and NRW A raised a series of queries regarding the Maximum Design Scenario (MDS) assessed. NE requested clarity on the area of seabed impacted by sandwave clearance. The Applicant indicated as part of the Further Information (*CML2365 Consultation log to applicant-Rev_2.0.26.07.2024 Further Information*) that the total area impacted and assessed equated to 1,150m^2. NE also requested

clarity on the locations of cable crossings protection, long-term subtidal habitat loss, and installation method, whilst NRW A queried the impacts of secondary scour from cable protection, particularly with regards to marine protected areas (MPAs). The Applicant indicated in their Further Information (*CML2365 Consultation log to applicant-Rev_2.0.26.07.2024 Further Information*) that overlap with MPAs and types of habitats impacted were presented in the ES. A map was also provided (*CML2365 MC000025_TN_Benthic_MBTN01_Rev02 Further Information*) showing that cable crossings are far from protected benthic habitats and that their impact will be insufficient to disrupt sediment transport, seabed morphology, or cause secondary scour. No further comments were received on this matter from NRW A or NE. NRW therefore considers the issue resolved.

7.4.4 NE indicated that a risk of permanent habitat change or loss was possible as some of the Project infrastructure and rock protection might be left in situ and requested from the Applicant a commitment to remove cable protection from MPAs. The Applicant confirmed that there are no plans to leave any infrastructure in place and their removal is required by legislation. NRW understands that existing UK legislation (Petroleum Act 1998, Energy Act 2008, Energy Act 2023) is clear that when an offshore carbon capture use and storage (CCUS) storage site is closed, the installations and injection facilities must be removed when decommissioned. In addition, all other items of equipment, infrastructure and materials that have been installed or drilled are expected to be entirely removed for disposal onshore. NRW considers the issue resolved.

7.4.5 NE requested that Electromagnetic Field (EMF) impacts on benthic invertebrates should be assessed. The Applicant indicated that the type of cable to be used and burial at 2-3m below seabed surface will not result in an EMF of a magnitude capable of affecting marine life. The Applicant provided justification as part of the Further Information (*CML2365 MC000025_TN_RIAA_MBTN04_Rev02 Further Information*). NE was satisfied with the response. NRW therefore considers the issue resolved.

7.4.6 NRW A agree with the Applicant that whilst the potential impacts from habitat loss/disturbance from the use of a plough or cable trenching machine on the Annex I intertidal mudflat and sandflat feature of the Dee Estuary SAC will be temporary, the potential area impacted by the plough is large and mitigation was therefore requested to reduce impact to the feature. The Applicant submitted further evidence as part of the Further Information (*CML2365 MC000025_TN_RIAA_MBTN04_Rev02 Further Information*); however, NRW A still requested the use of matting and reduced tyre pressure of working vehicles in the intertidal to minimise compaction and impact to the Annex I intertidal mudflat and sandflat feature of the Dee Estuary SAC. NRW considers the requirement to be needed and will be incorporated in the Construction and Environment Management Plan (CEMP) secured through marine licence conditions.

7.4.7 NRW A considered that further evidence was required for the assessment of impacts to the Annex I Mudflat and Sandflat feature of the Dee Estuary SAC from trenching in West Hoyle Split. Further evidence was provided as part of the Further Information submission (*CML2365 MC000025_TN_Benthic_MBTN01_Rev02 Further Information*) confirming that the worst-case route option across the West Hoyle Spit will no longer be pursued, therefore suspended sediment concentrations

and sedimentation associated with the trench excavation is not predicted to reach the Dee Estuary SAC/SPA/SSSI and associated cockle beds. No further comments were received from NRW A. NRW therefore considered the issue resolved.

7.4.8 NRW A requested further evidence to support the assessment of suspended sediment concentration and associated deposition impacts during construction on the Dee Estuary Cockle beds. This was also raised as an issue to impacts to Annex I Estuaries feature of the Dee Estuary SAC. This information was received as part of the Further Information submitted (*CML2365 MC000025_TN_Benthic_MBTN01_Rev02 Further Information)* confirming that the worst-case route option across the West Hoyle Spit will no longer be pursued, therefore suspended sediment concentrations and sedimentation associated with the trench excavation is not predicted to reach the Dee Estuary SAC/SPA/SSSI and associated cockle beds. No further comments were received from NRW A. NRW therefore considered the issue resolved.

7.4.9 NRW A requested that the impacts from increased suspended sediment concentration and associated deposition for the operations and maintenance phase needed to be assessed. The Applicant indicated that the Benthic Ecology MDS in the ES (Chapter 7: Marine Biodiversity) considered that the area impacted during this operation and maintenance phase will be minimal when compared to the construction phase, with potentially 500m of cable subject to reburial every 5-10 years, with the magnitude predicted to be negligible on a habitat that has very low sensitivity to the pressure. Therefore no significant impact was predicted. No further comments from NRW A were received. NRW agreed with the assessment presented by the Applicant and that further assessment will not result in a material change to the conclusion. NRW therefore considered the issue resolved.

7.4.10 NRW A requested further information to be included in the ES with regards to the increased temperature impacts on benthic communities (particularly to intertidal habitats) from the pipeline. The Applicant indicated as part of the Further Information (*CML2365 Consultation log to applicant-Rev_2.0.26.07.2024 Further Information*) submission that the relevant temperature modelling outputs have been provided in the ES (*CML2365-LBA CCS Ltd_ES_CH7_MB_NRW_FINAL*) and concluded that due to the very limited area that could be impacted (1m from the pipeline) and the magnitude of the temperature changes will be within the normal tolerance levels of these habitats, it is considered that the magnitude of impact will be negligible. NRW A were satisfied with the response. NRW considers the issue resolved.

7.4.11 NRW A stressed the need for an Invasive Non-Native Species Management Plan (INNSMP). As part of the Further Information (*CML2365 Consultation log to applicant-Rev_2.0.26.07.2024 Further Information*) submission, the Applicant committed to the development of an INNSMP as part of the Construction Environmental Management Plan (CEMP) which will apply to all subtidal and intertidal activity. NRW consider production and implementation of a INNSMP can be secured through marine licence conditions.

7.4.12 NRW A queried further details regarding the cumulative impact assessment in relation to habitat loss and disturbance to intertidal habitats. The Applicant indicated as part of the Further Information (*CML2365 Consultation log to applicant-*

Rev_2.0.26.07.2024 Further Information) to demonstrate that the no significant cumulative impact to Annex 1 intertidal habitat is predicted.. The impact level of the project on its own for loss/disturbance was calculated to be 0.13% of the total Dee Estuary SAC area, and combined with Port of Mostyn (PoM) MEPE the area loss/disturbance was 0.139%. The sediment deposition during capital dredging at PoM MEPE is expected to be undetectable in areas of overlap with the Proposed Development, which is modelled to be impacting only the vicinity of the trenched area (up to 160 mm thickness within areas of coarse sediment in the immediate vicinity of trench). Moreover, the high energy nature of the area will likely redistribute the sediments within a few tidal cycles natural sediment transport. NRW A was satisfied with the response. NRW considers the issue resolved.

7.4.13 NRW A requested details of assessments for biosecurity and pollution risks in relation to features of the Dee Estuary SAC (Annex I Estuaries and Annex I Mudflats and sandflats not covered by seawater at low tide). The Applicant indicated as part of the Further Information (*CML2365 Consultation log to applicant-Rev_2.0.26.07.2024 Further Information*) submission their commitment to the submission of a INNSMP and Marine Pollution Contingency Plan (MPCP) as part of the Construction Environmental Management Plan (CEMP). The Applicant ensures adherence to national and international standards and regulations regarding marine pollution. NRW consider that pollution prevention measures can be appropriately secured within a CEMP which includes a Marine Pollution Contingency Plan (MPCP).

7.5 Fish Ecology and Fisheries

7.5.1 NWIFCA highlighted the presence of the commercial mussel beds in the Dee estuary in the vicinity of the cable route as well as a commercial cockle bed (Southport) in the vicinity of the Lennox wellhead platform and stressed these should not be impacted by the Proposed Development. NRW Cockle Fisheries Officer requested that inshore cable trenching (work closest to the cockle beds) avoid the spat settlement period (June) as the spat are vulnerable to smothering. NRW Cockle Fisheries Officers requested the Applicant considers avoiding dredging the same time as the MEPE dredge campaign to reduce in combination SSC impacts on cockle beds. The Applicant responded, as part of the Further Information submission, indicating that modelling of SSC and associated deposition from cable installation activities show no significant effect on the nearby mussel, cockle beds, and fisheries (*CML2365 MC000025_TN_Fish_MBTN02_Rev02 Further Information*). The Applicant also confirmed that the worst-case route option, across the West Hoyle Spit, will no longer be pursued. The alternative option to the east will be taken forward which avoids the excavation of the trench across the Spit resulting in a reduced worst-case scenario. Suspended sediment concentrations and sedimentation associated with the trench excavation is therefore not predicted to reach the Dee Estuary SAC/SPA/SSSI and associated cockle beds. No further comments were received. NRW considers the issue resolved.

7.5.2 NWIFCA indicated that there is a potential to introduce pollutants to the marine environment through pre-cast concrete structures and recommends their rinsing prior installation. The Applicant confirmed part of the Further Information (*CML2365 Consultation log to applicant-Rev_2.0.26.07.2024 Further Information*) that concrete

mattresses, and rock protection will be rinsed prior installation. NRW considers that this can be secured through marine licence conditions.

7.5.3 NWIFCA stressed that the Proposed Development overlaps with areas of fishing activity and there is a need for timely and proactive communication with the fishing community and other users. The Applicant confirmed part of the Further Information (*CML2365 Consultation log to applicant-Rev_2.0.26.07.2024 Further Information*) that the development would occur within the existing 500m fishing exclusion zones surrounding the Eni Operational infrastructure, and Eni has an existing agreement with the NFFO, which ensures that local fishermen are compensated for disruption when works are being carried out. The Applicant confirmed that this agreement will continue throughout the construction and operation of the LBA CCS project. No further comments were received. NRW considers the issue resolved.

7.5.4 WG Marine and Fisheries Division indicated that the data used to inform the ES on fishing activity in the Proposed Development area was outdated (2013 and 2019) and will not reflect the current fishing activity in the area. The Applicant indicated part of the Further Information (*CML2365 Consultation log to applicant-Rev_2.0.26.07.2024 Further Information*) that the newer dataset (post 2019) would include Covid-19 years which will under-represent the fisheries in the area. The Applicant indicated that the Proposed Development would result in an increase of 2 vessels to the daily baseline and that the majority of the Proposed Development would occurs within the existing 500m fishing exclusion zones surrounding the Eni Operational infrastructure, No further comments were received. NRW consider the issue resolved and that notices to mariners can be secured through marine licence conditions.

7.5.5 NE raised concerns of the lack of evidence in support of ruling out impacts of vessel noise during construction, operation and maintenance, and decommissioning phases on the basis that impacts will be very localised. The Applicant indicated, as part of the Further Information (*CML2365 Consultation log to applicant-Rev_2.0.26.07.2024 Further Information*), that the underwater noise modelling (*CML2365-LBA CCS Ltd_ES_Appendix J_UWN TR_NRW_FINAL*) showed that for fish to be significantly impacted by vessel noise they would need to be continually located within metres of the source for a period of 12 hours for temporary threshold shift (TTS) to occur (48 hours for recoverable injury). This is unlikely considering the mobile nature of fish and the background heavily trafficked soundscape. The Applicant indicated that the Proposed Development would result in an increase of 2 vessels to the daily baseline and that the majority of the Proposed Development. NE remained of the view that the evidence was needed to rule out the impact. No concerns were raised by JNCC and NRW on this matter.. NRW, based on the evidence provided by the Applicant regarding vessel noise, considers that no significant impact on fish through vessel noise is predicted.

7.5.6 NE disagreed with the use of soft start piling as effective mitigation for fish species due to the lack of evidence in support of a fleeing response. NRW A also raised similar concerns regarding the reliance of “ramping” or soft start as mitigation for underwater noise impacts and advises the use of static calculations for fish receptors. The Applicant agreed with the comment but stressed this was already caveated within the ES (Chapter 7: Marine Biodiversity) indicating that soft starts will benefit some reactive species but not all. NRW considers that soft start are

considered best practice techniques used to reduce the impact of underwater noise on receptors and that the outcome of the assessment did not rely on this mitigation but rather on the commitment to a Marine Mammal Management Plan, where soft start procedure would be considered alongside other mitigation options for pilling activities. Therefore, NRW considers the issue closed and no changes necessary.

7.5.7 NE indicated that the Proposed Development could disrupt diadromous fish movement to and from key rivers during sensitive periods. NE suggested that migratory routes should be used to assess their overlap with the Proposed Development and seasonal restrictions considered to mitigate the potential impact on migratory fish. NRW A raised similar concerns although acknowledging their agreement with the conclusions of the EIA, that the impact is not significant in EIA terms due the relative short duration of pilling activities. The Applicant indicated as part of the Further Information (*CML2365 Consultation log to applicant-Rev_2.0.26.07.2024 Further Information*) that migratory routes for diadromous fish have a high degree of uncertainty and argued that considering the nature and magnitude of the impact (short lived, intermittent), that any impact is predicted to be negligible. No further comments were received by NRW A or NE on this matter. NRW therefore considers the issue closed.

7.5.8 NE and NRW A raised concerns of impacts of underwater noise on spawning grounds for Atlantic herring and cod. The Atlantic herring spawning habitat assessment was re-evaluated as part of the Further Information (*CML2365 MC000025_TN_Fish_MBTN02_Rev02 Further Information*) indicating that over 93% of the Proposed Development area was unsuitable spawning habitat for the species. NRW A agreed with the conclusion of minor adverse impact as a result of underwater noise on Atlantic herring due to the short piling duration and limited amount of suitable spawning habitat.

7.5.9 The Applicant, acknowledged that cod has higher sensitivity to underwater noise during courting and spawning (key months being February and March); however, the Applicant considers that the worst case prediction is of minor adverse effects as spawning ground's boundaries are uncertain and their overlap with the Project Development area is small (limited (in time and space) overlap). NRW A requested that consideration is given to the timing of piling to try an avoid the cod key sensitive months (February to March). The Applicant confirmed in their Further Clarification (*CML2365 Further Clarification response November 2024*) that the planned timing of works (i.e., pilling) is planned for the summer months (July 2026) outside the sensitive period for cod. NRW considers that as the footprint overlap with the Project Development, the Applicant should avoid the sensitive period where operationally possible and timing of works should be included as part of the CEMP.

7.5.10 NRW A queried the Applicants assessment of UXO clearance activities with regards to fish. The Applicant confirmed as part of the Further Information (*CML2365 MC000025_TN_RIAA_MBTN04_Rev02 Further Information*) that the Report to Inform the Appropriate Assessment is based upon the maximum impact ranges for UXO clearance associated with high order techniques. NRW A requested a stronger commitment to low order detonations, in line with the *Marine environment: unexploded ordnance clearance Joint Position Statement (21 January 2025)*. The Applicant as part of the Further Clarification submission (*CML2365 Further Clarification response November 2024*) confirmed their commitment to prioritise low

order detonations as the first approach for UXO clearance activities in line with the Position Statement. NRW considers that the potential impact is mitigated by the requirement for the production and implementation of a Marine Mammal Management Plan (MMMP) .

7.5.11 NRW A requested further justification for the omission of EMF impacts in the assessment. The Applicant clarified as part of the Further Information submission (*CML2365 MC000025_TN_RIAA_MBTN04_Rev02 Further Information*) that that the type of cable to be used and burial at 2-3m below seabed surface will not result in an EMF of a magnitude capable of affecting marine life. NRW A was satisfied with the response. NRW therefore considers the issue resolved.

7.6 Water Quality

7.6.1 NRW A requested further details on the burial techniques along the cable route relative to appropriate datum (such as MHWS) to aid understanding of the nature of the proposed works in the intertidal zone, the near-shore and offshore areas. The Applicant clarified as part of the Further Information (*CML2365 Consultation log to applicant-Rev_2.0.26.07.2024 Further Information*) that the application documents included maps, layout drawings, cross sections, quantities of materials, installation method statements, and provided coordinates for all the proposed infrastructure for the Proposed Development in Welsh Waters and that the ES describe that below MHWS, the cables will be buried to 2-3m in depth using a plough or cable trencher. The cable lay vessel will be then beached on the intertidal area at Talacre Beach and the cable will be pulled directly from the vessel along through the HDD conduit to the shoreward side of the dunes where the lay vessel will pull a trencher or plough to lay the cable. The Applicant also clarified that the worst-case scenario of dredging a channel through the West Hoyle Spit for laying the cables will not be pursued and that the simultaneous lay and burial of the cable will be done within one passage between Point of Ayr and the New Douglas platform. Therefore, the worst-case scenario assessed in the ES will be over precautionary. NRW was satisfied with the response and agrees that the assessment already provides enough details of the methods and considers the issue resolved.

7.6.2 NRW A raised concerns regarding the possible release of contaminants around the cable corridor, as no sampling for levels of sediment-bound contaminants has been carried out, and their impact on water quality and benthic ecology (particularly in the intertidal) has not been assessed. The Applicant indicated as part of the Further Information (*CML2365 Consultation log to applicant-Rev_2.0.26.07.2024 Further Information*) that cable installation is planned at periods of low water using a plough/trencher. The methods will result in trench mostly filling back as the machine moves or being reworked naturally with minimal disturbance. The Applicant also indicated that sediment sampling in the wider Eni Development Area resulted in no stations having contaminants levels above Cefas Action Level 1. NRW completed a WFD compliance assessment for all activities and have consulted this with NRW A. NRW A agrees the Proposed Development should not result in the mobilisation of sediment-bound contaminants that could affect either the biological or chemical status of the waterbody. NRW therefore consider the matter resolved.

7.7 Marine Mammals

7.7.1 NE indicated that consideration should be given to the inclusion of NGO/citizen observer data in the data used on the impact assessment of marine mammals. The Applicant provided a summary of this data as part of the Further Information submission (*CML2365 EHE7228B_TN_MM_Rev02 Further Information*) and justified that the baseline provided as part of the ES is considered sufficient to provide a robust characterisation. NE maintained their view that the NGO/citizen science data should be included. NRW has considered all views and is of the opinion that the baseline densities used in the assessment are suitable and considers the issue closed as it will not result in any material change to the conclusions of the ES.

7.7.2 NRW A requested that either the most precautionary or the most scientifically robust density values are taken forward to the assessment. For harbour porpoise the density of 0.086 per km^2 is consider lower and less robust than the more up to date densities supplied from the latest edition of the Marine Mammal Atlas (Evans & Waggit, 2023), whilst for bottlenose dolphin, further clarity on the densities used was requested. The Applicant, as part of the Further Information (*CML2365 EHE7228B_TN_MM_Rev02 Further Information*) and Further Clarification submitted (*CML2365 Further Clarification response November 2024*), indicated that the data used was the most precautionary cetaceans densities at the time of submission. The SCANS-IV (Gilles et al., 2023) and the Welsh Marine Mammal Atlas (Evans and Waggitt, 2023) were not available but the maximum densities were used in the ES representing a more precautionary and reasonable worst-case for assessment purposes. The Applicant also summarised the NGO/citizen science data available as part of their Further Information (*CML2365 EHE7228B_TN_MM_Rev02 Further Information*) indicating that the addition to the densities would not result in any material change to the established baseline characterisation. NRW A agreed with the suitability of the assessment presented. NRW therefore consider the matter resolved.

7.7.3 A series of comment were received from ANCBs in relation to the clearance of unexploded ordnance (UXO). JNCC, NE and NRW A requested a stronger commitment from the Applicant to follow the *Marine environment: unexploded ordnance clearance Joint Position Statement (21 January 2025)* giving priority to low order clearance of UXO and moving away from the use of donor charges as a mitigation method. The Applicant, as part of the Further Information submission (*CML2365 EHE7228B_TN_MM_Rev02 Further Information*) and Further Clarification submitted (*CML2365 Further Clarification response November 2024*), confirmed its commitment to work in line with the Position Statement and indicated that any reference to high order detonations were done to define the worst-case scenario for underwater noise modelling. NE and NRW A also requested the inclusion of bubble curtains as mitigation measure, and indicated that where injuries ranges are predicted to be of less than 1km from the source the use of ADDs as mitigation against auditory injury from UXO and piling should not be used. NRW A advised that the calculation of the ADD usage duration should be based on the time it would take an animal to flee the injury range (based on the noise source, UXO size, clearance method etc). It is expected the use and duration of ADD will be determined as part of the MMMP post consent which the Applicant agreed as part of the Further Information (*CML2365 Consultation log to applicant-*

Rev_2.0.26.07.2024 Further Information) submission. NRW is satisfied with the level of commitment from the Applicant regarding working in line with the *Marine environment: unexploded ordnance clearance Joint Position Statement (21 January 2025)* and considers that impact resulting from UXO and piling is mitigated through the Marine Mammal Management Plan (MMMP) which will require approval and consultation with ANCBs before commencement of licensing activities, it will be expected that the MMMP has been informed by the *Marine environment: unexploded ordnance clearance Joint Position Statement (21 January 2025)*. Furthermore, a Unexploded Ordnance (UXO) Method Statement will also be required for approval before commencement of licensing activities

7.7.4 NE and NRW A indicated that Temporary Threshold Shifts (TTS) should not be used for assessing the impact of piling; that the use of ADD should be incorporated into the underwater noise modelling, and that the impact ranges for Permanent Threshold Shift (PTS) without ADD should be the basis for the assessment. The Applicant as addressed these concerns as part of the Further Information submission (*CML2365 EHE7228B_TN_MM_Rev02 Further Information*) and confirmed the inclusion of impact ranges for underwater noise modelling with and without 30 min ADD. NRW A were satisfied with the response and that the use and duration of ADD will be determined as part of the MMMP post consent. NRW is satisfied that a MMMP can be secured through the marine licence. NRW consider subject to mitigation that no significant impact on marine mammals as a result of underwater noise is predicted.

7.7.5 NE and the Applicant disagree on the magnitude assigned to PTS impact for marine mammal auditory injury. NE considers the magnitude applied in the impact assessment should be of medium for auditory injury as this is an irreversible injury. The Applicant provided further justification on their assessment as part of their Further Information submission (*CML2365 EHE7228B_TN_MM_Rev02 Further Information*) indicating that without mitigation, the number of animals impacted to PTS by the Proposed Development would be less than one and, therefore, unlikely to affect the wider population level. With mitigation (MMMP) the Applicant indicates that injury is assumed to be entirely mitigated. NE continue to disagreed with the assignment of low magnitude value without mitigation, however, it is agreed that with mitigation that significant impact can be ruled out. NRW has considered all views and is of the opinion that the higher magnitude will not result in a material change to the assessment particularly when taking into account the proposed mitigation. NRW considers the issue closed.

7.7.6 NRW A indicated that not enough justification or quantification of the effects of vessel noise and geophysical / seismic surveys is presented to determine the overall magnitude level of low or the screening of cumulative impacts. The Applicant provided this justification as part of the Further Information submission (*CML2365 EHE7228B_TN_MM_Rev02 Further Information*). NRW A was satisfied with the response and the proposed mitigation such as vessel slowdowns. NRW considers that the impact can be controlled through conditions to the marine licence including the Vessel Management Plan (VMP) and the MMMP.

7.7.7 NRW A requested that the appropriate Marine Mammal Management Unit (MMMU) was applied for the assessment of impacts to grey seals and requested clarity on the need to route the cable through the West Hoyle sandbank as it is a major haul

out site for grey seal. The Applicant updated their assessment to include the grey seals MMMU and presented this as part of the Further Information submission (*CML2365 EHE7228B_TN_MM_Rev02 Further Information*), in addition the Applicant clarified that the reference to West Hoyle sandbank was an error which should read West Hoyle Split. NRW A was satisfied with the changes. NRW therefore considers the issue resolved.

7.7.8 NRW A does not recommend the use of screening distances for assessing in-combination impacts on marine mammals but agreed that in this instance the approach was acceptable considering the level of risk. However, NRW A requested further justification for the screening radius applied for disturbance from vessel noise and geophysical/seismic survey noise. The Applicant provided further justification as part of the Further Information submission (*CML2365 EHE7228B_TN_MM_Rev02 Further Information*). NRW A was satisfied with the assessment but reminded the applicant that for future applications it is recommended to assume a worst-case scenario of surveys overlapping. NRW A also requested the inclusion of data from the Morgan, Mona and Morcambe offshore windfarms is incorporated into the in-combination assessment. However, NRW considers that as this data was not available at the time of submission of the Proposed Development application, it will be disproportionate to request its inclusion at this stage. NRW consider due to the submission dates of the Project that it will be for Morgan, Mona and Morcambe offshore windfarms applications respectively to consider the in-combination effects within the HyNet development as part of their assessments. NRW therefore considers the issue resolved.

7.8 Ornithology

7.8.1 NRW A, NE and JNCC indicated that given the existent pressures on some designated features of Liverpool Bay SPA (including Red Throated Diver and Common Scoter) additional displacement should be avoided. A seasonal restriction of all vessel activity within the SPA was requested by JNCC and NE. NRW A also recommended the management of the vessel movement to avoid adverse effect on site integrity. The Applicant provided Further Information (*CML2365 Consultation log to applicant-Rev_2.0.26.07.2024 Further Information*) and Further Clarification (*CML2365 Further CLARIFICATION response November 2024*) on the matter indicating that the Proposed Development would result in an increase of approximately two vessels to the daily baseline. However, ANCBs remained of the view that mitigation such as timing restrictions on vessel movements were necessary. The Applicant committed to avoid the most sensitive months when carrying out cable/pipeline laying and protection activities. Cable/pipeline laying and protection were consider the activities that could result in the highest disturbance. In addition, the Applicant committed to the implementation of a Vessel Traffic Management Plan (VTMP) to control other vessel movements during the most sensitive period (1st November – 31st March inclusive). NRW A agrees with this restrictions and mitigation measures. NRW therefore considers that the potential impact as a result of displacement can be mitigated through a combination of timing restrictions on Cable/pipeline laying and protection activities and a VTMP secured through the marine licence.

7.8.2 NRW A indicates that the survey data used to inform the Little Tern Foraging Distribution Technical report (associated to Gronant Dunes and Talacre Warren

SSSI, Liverpool Bay SPA, Dee Estuary SPA) has only collected data across one Little Tern breeding season (which runs from mid-April to mid-July) and does not include boat-based work. As the species can display inter-annual foraging behaviour variations due to environmental conditions or prey availability, NRW A requested further evaluation on the comparability of the data collected with older breeding colony data. The Applicant submitted such justification to the approach taken as part of the Further Information (*CML2365 Consultation log to applicant-Rev_2.0.26.07.2024 Further Information*), indicating that as no Little Tern were noted flying beyond the 2 km survey limit, no boat-based survey was considered necessary for the characterisation. The Applicant agreed with NRW A that the timing of the works should avoid the nearshore waters during the breeding period and committed to work with NRW A to define a seasonal period. The Applicant also stressed that the worst-case route option considered within the ES will not be pursued as only one passage of the laying cable and no dredging across the West Hoyle Spit will be needed, reducing the project footprint and duration within the Little Tern foraging area. The Applicant also confirmed the commitment to the management of environmental impacts during construction by submitting a CEMP. Furthermore, a change to the cable route approach to Point of Ayr was submitted on 05 February 2025 which moved the cable route approximately 250m to the west, to areas of lower density of foraging Little Tern. NRW A welcomed the change but as data from the Little Tern colony reports suggest there is still significant breeding activity during July and the activity will still cross the very limited foraging range of the species. NRW A therefore requested the works to be carried out outside the breeding season (mid April to mid July) and as far into August and September as possible and to be consulted on the method and timing of the works before commencement. NRW therefore considers appropriate timing restriction should be incorporated into the CEMP which can be secured through conditions of the marine licence.

7.8.3 NRW A stressed that disturbance to Little Tern nests, eggs or dependent young is not permissible unless under a species licence is obtained, as it is listed Schedule 1 species in the Wildlife and Countryside Act (as amended). NRW A also reiterated that works undertaken during the overwintering period of September to March inclusive, should include measures to reduce disturbance to other overwintering bird features of the Dee Estuary SPA which could include not undertaking works in, or close to, the intertidal area two hours either side of high tide. Due to this potential for disturbance to both breeding and overwintering receptors, NRW A requested consultation on a clear timetable for the proposed works. The Applicant confirmed that consideration of timing restriction and migration measures during sensitive periods would be considered as part of the CEMP. NRW considers that a requirement to produce and implement a CEMP can be secured through marine licence conditions.

7.8.4 NE and NRW A requested further evidence on how roosting and nesting birds on the offshore platforms (e.g., kittiwakes) have been considered in the ES. The Applicant indicated as part of the Further Information (*CML2365 Consultation log to applicant-Rev_2.0.26.07.2024 Further Information*) that impact to nesting/roosting birds which are not covered by the marine licence, have been fully assessed by OPRED as part of the Partial Decommissioning Environmental Appraisal in support of the NSTA Storage Permit Application (ES/2022/009). NRW therefore considers the risk will be controlled by OPRED and the Environmental Appraisal and

Decommissioning Programme under the Petroleum Act 1998. NRW continue to encourage the Applicant to engage with ANCBs on the matter.

7.9 Navigation

7.9.1 Regarding the new Douglas Platform, the MCA requested construction vessels to comply with all maritime safety legislation, and the UK Standard Marking Schedule for Offshore Installations. This was confirmed by the Applicant as part of the Further Information (*CML2365 EHE7228B_LB_HYNET_ES_CH09_SN_FINAL_For Submission_Rev01 Further Informat*). The MCA also requested the details for the vessels used and relevant contact information for emergency response procedures to be provided to HM Coastguard. This was also confirmed by the Applicant and will be secured through marine licence conditions. The MCA considered a new 500m safety zone would be required around the new Douglas platform. The Applicant indicated that the new Douglas CCS platform lays within an existing Area to be Avoided, which restricts vessels from transiting close to the platform and that a new 500m Safety Zone is expected to be in place. Assigning Restricted Navigation Areas are outside the jurisdiction of any marine licence determination, and any application for such area would need to be made to the appropriate authorities. No further comments were received. NRW is satisfied that the risks will be mitigated and considers the matter resolved.

7.9.2 Following consultation on the application, the MCA notes that the cables are anticipated to be buried to a target depth of between 2-3m and external cable protection to be used where burial is not possible. The MCA notes that depending on the vessel traffic in the area, an anchor penetration study may be necessary as part of the Cable Burial Risk Assessment (CBRA). In addition, the MCA requested a compass deviation survey post the cable being laid to confirm conformity with a three-degree deviation for 95% of the cable route and five-degree deviation for no more than 5% of the remaining cable route. The Applicant indicated as part of the Further Information (*CML2365 Consultation log to applicant-Rev_2.0.26.07.2024 Further Information*), that the specifications of the cable will result in extremely low EMF values likely to be less than ~0.1μT calculated at the seabed which should have no impact on navigation systems or cause compass deviation. The MCA responded requesting that a compass deviation desk-based study is submitted to confirm this assumption. NRW considers that the compass deviation desk-based study can form part of the CSIP and will determine whether the compass deviation limits set by the MCA can be met and whether a post-construction compass deviation survey of the 'as laid' cables will be required. NRW consider the impact can therefore be mitigated through the production and adherence to a CSIP (to include a CBRA and a compass deviation study) which can be secured to the marine licence.

7.9.3 Port of Mostyn (PoM) indicated that any obstruction to the Welsh Channel navigation will have consequences for the Port's business and requested confirmation that the cable will be buried to the depth of the existing pipeline (-9CD), as to not impact potential future dredging campaigns carried out by the Port. Clarity was also requested on areas of cable protection across the Welsh Channel. The MCA request that a detailed draught assessment will be needed post consent to determine if there are any safety risk to navigation. The Applicant updated the

Navigation Risk Assessment as part of the Further Information (*CML2365 A4814 ENI Hynet CCS NRA_Rev04 Further Information*) confirming the cable will be buried to the existing pipeline depth, that there will be no rock protection within the Welsh Channel, but that some cable crossings which require protection that will result in more than 5% loss of water depth. The MCA indicates that the locations must be risk assessed in line with MGN 654, and approval sought. The Applicant confirms that in those areas a detailed draught assessment will be carried out post-consent to determine any safety risk to navigation, which will be agreed with the MCA, PoM and TH as part of the Vessel Management Plan (VMP) and CSIP. NRW consider the impact on navigation can be mitigated by the production and adherence to a CSIP and VMP that can be secured through marine licence conditions.

7.9.4 PoM as Statutory Harbour Authority in the Welsh Channel, requested full engagement with contractors for cable laying operations to minimise impact to PoM activities. PoM also stressed that the daily vessel count used in the assessment did not take PoM data, nor did it consider all types of vessels and their drafts transiting the Welsh Channel. They also indicated that the future scenario presented should consider their Mostyn Energy Park Expansion (MEPE) which is expected to start 2025/2026 and will result in an increase in PoM shipping activities. The Applicant produced an updated NRA and impact assessment as part of the Further Information submission (*CML2365 A4814 ENI Hynet CCS NRA_Rev04 Further Information*, *CML2365 EHE7228B_LB_HYNET_ES_CH09_SN_FINAL_For Submission_Rev01 Further Information*) which incorporated the details of the vessel types and movements at PoM. PoM was satisfied with the updated NRA, shipping and navigation impact assessment, and the Applicant's commitment of undertaking a draft assessment as part of the VMP. NRW considers the issue resolved and that the requirement for a VMP can be secured through marine licence conditions.

7.9.5 PoM requested clarity on the cable route across the Welsh Channel, particularly with regards to the programme for the trenching, cable laying, burial operations and installation of any cable protection measures. The Applicant clarified the preferred timetable as part of the Further Information (*CML2365 Consultation log to applicant-Rev_2.0.26.07.2024 Further Information*) but PoM further raised concerns surrounding the operation programme/timings as it considered these could result in the closure of the Welsh Shipping Channel. The Applicant provided further details of the methods and timing of works within the Channel as part of the Further Clarification (*CML2365 Further Clarification response November 2024).* However, PoM remained opposed to the Proposed Development as described, as they had concerns that the works as proposed had the potential to take longer and may even not be feasible. The Applicant engaged with the PoM and submitted a change to the cable route approach to Point of Ayr on 05 February 2025 which moved the cable route approximately 250m to the West and minimised the impact to the Channel. Moreover, the Applicant also indicated the development of a draft Memorandum of Understanding (MoU) with PoM to define working approach to minimise disruption to the port and ensure cable burial depth. PoM confirmed the signing of the MoU and withdrew their objection to the project on 14 February 2025. NRW therefore considers the matter resolved.

7.9.6 The MCA requested confirmation that all maritime legislation will be followed, which has been confirmed by the Applicant and detailed in the NRA (*CML2365 A4814 ENI*

Hynet CCS NRA_Rev04 Further Information). The MCA also requested a series of notifications, before commencement of any activities, to mariners and fishermen, HMCG, UKHO. NRW consider that notification can be secured through marine licence conditions. The MCA requested a series of conditions with regards to bunding/storage facilities (for fuel and chemicals), pollution prevention, damage of infrastructure, and dropped objects. NRW are satisfied that pollution prevention measures and a Dropped Object Plan can be secured to the marine licence.

7.9.7 The MCA requested that survey data is submitted as third party data to the UK Hydrographic Office (UKHO) for the update of nautical charts. The MoD also requested to be provided with post installation survey information of new cables and pipelines for the development undertaken between Douglas and Lennox installations. NRW considers this can be secured through condition of the marine licence.

7.9.8 The MCA indicated that consideration should be given to the monitoring of cables during the operational lifetime to ensure timely management of unburied or shallow buried cables/ pipelines. The Applicant confirmed that a Monitoring Plan is part of the Carbon Storage Permit requirements, which includes annual asset integrity checks (including to cables, pipeline, platforms, wells, cable protection). NRW considers the integrity monitoring of assets sufficiently controlled under the Carbon Storage Permits (CS004A, CS004B, and CS004C) and consider there is no need to duplicate the requirement within the marine licence.

7.10 Public Health

7.10.1 PHW indicated their support for CCS projects but advised that current sector guidance and best available techniques (BAT) are for continuous risk assessment of all stages. Following the submission of Project Wide Environmental Effects Report (*CML2365 HyNet Project-wide Environmental Effects Report Further Information*) which was submitted as part of the Further Information submission the PHW highlighted the 'moderate adverse significant effects' of noise and vibration on population and human health, water resources and flood risk. The Applicant highlighted that issues raised are outside the marine licence but part of the wider project and responded by email on 03 September 2024 indicating that the PHW issues raised have been assessed through the associated Flintshire County Council Planning Permission (FUL/000246/23) and provided clarity that the effects relate to the construction phase of the onshore elements. Appropriate mitigation of the impacts have been secured through conditions in the planning permission. The mitigation measures in the Planning Permission relate to the preparation of an overarching Construction Environmental Management Plan (CEMP, Condition 8) which will include a noise and vibration management plan as mitigation and other management plans for a range of topics (Conditions 5, 6, 7, 9, and 10 of the Planning Permission are also relevant). NRW considers that the issue is appropriately controlled by the Planning Permission and that there is no need to duplicate the requirement within the marine licence.

7.10.2 PHW recommended that as part of the air quality assessment, emissions particulate matter (PM) and nitrogen dioxide (NO_2) are non-threshold pollutants are also considered. Also, as part of greenhouse gasses assessment, PHW recommend that there is a consideration of leaks, water quality and dedicated bathing locations,

impacts of noise to human receptors, and impacts on shellfish safety. Finally, PHW also highlighted the risk of dredging West Hoyle Bank to coastal flooding. As explained above, the Applicant confirmed that the route across the West Hoyle Sandbank/Slip will not be pursued eliminating this risk. The Applicant also provided an assessment of air quality impacts as part of the application (*CML2365-LBA CCS Ltd_ES_Appendix C1_AQ_NRW_FINAL*) which indicated that air quality effects during construction, operation, maintenance and decommissioning of the Proposed Development were not considered significant. PHW confirmed their concerns have been addressed. NRW is satisfied that all these topics have been fully assessed as part of the ES and that the dredging of the West Hoyle Sandbank will not the pursued as an option. NRW therefore considers the issues resolved.

7.11 Other legitimate users of the sea

7.11.1 NRW received three representations as part of the public consultation process. Rhyl Flats Wind Farm Ltd., Gwynt y Môr Ltd., and North Hoyle Wind Farm Ltd.. All three companies requested that Simultaneous Operations (SIMOPS) Protocols are agreed prior to commencement of any works to ensure that the Proposed Development does not adversely affect the routine and emergency operational movements to/from their respective wind farms from the Port of Mostyn. The Applicant indicated that SIMOPS cannot be agreed until contractors are appointed. On the 16 December 2024 the operators of the wind farms confirmed they were satisfied following engagement with the applicant that the SIMOPS will be achievable. NRW therefore considers that SIOMPS can be secured through marine licence conditions.

7.11.2 Gwynt y Môr Ltd. and North Hoyle Wind Farm requested that a Cable Crossing Agreement (CCA) is required with respect to crossings with the offshore windfarms cables before the licence is issued. The Applicant, on the 26 March 2025, indicated that a draft CCAs have been submitted to both windfarms' operators. The operators of the wind farms confirmed on the 27 March 2025 that North Hoyle CCA was under negotiation whilst Gwynt y Môr CCA was under review. NRW consider it appropriate to include licence condition ensuring that CCA are in place.

8 Mitigation or monitoring measures to be taken

8.1 Features or measures to avoid, prevent, reduce or offset likely significant effects

8.1.1 In reaching the Conclusion about Environmental Impact (Regulation 21A of the Regulations), NRW must consideration of any features of the project, or proposed measures, to avoid, prevent, reduce or offset any likely significant adverse environmental effects (regulation 21A (1)(f)).

8.1.2 NRW considers that the following features of the project, or measures included within the project proposal, as described in the application form, Environmental Statement and other supporting information, would avoid, prevent, reduce or offset any likely significant adverse environmental effects:

- Scour protection (e.g. rock berms) will only be used at third-party cable crossings to reduce the potential for scouring of seabed sediments to occur.
- Suitable implementation and monitoring of Cable Protection informed by a Cable Burial Risk Assessment (CBRA). Cables will be buried to a target depth of 2-3m and only be protected using external protection (e.g. rock berms) at third party crossings.
- Cable protection to have a profiled cross section and height limited to < 1 m to minimise changes to physical processes.
- No external cable protection in the intertidal area to minimise potential impacts on intertidal habitats within the Dee Estuary SAC and SPA.
- Trenchless techniques (e.g. Horizontal Directional Drilling (HDD)) will be used for cable installation at landfall which will reduce any direct habitat disturbance or scour to intertidal habitats.
- Following further survey and detailed engineering of cable route, if areas are identified where external protection is required and a reduction of more than 5% in water depth is expected, a location specific review of impacts to shipping and consultation with the MCA will be carried out and additional mitigations agreed as required as per MCA MGN 654. This ensures the final profile is suitable for Search and Rescue (SAR) operations and that reductions in under keel clearance are acceptable.
- Appropriate Lighting and marking of project vessels and broadcast of their status on AIS at all times, to indicate the nature of the work in progress, and highlight their restricted manoeuvrability. This is to maximise the awareness of the Proposed Development.
- Where required, based on the navigation risk assessment, guard vessels and/or temporary aids to navigation may be deployed to guide vessels around any areas of construction activity. Where cable exposures exist that would result in significant risk (e.g. if cable burial is carried out post cable lay), guard vessels will be used where appropriate until the risk has been mitigated by burial and/or other protection methods. This is to maximise awareness of temporary hazards.
- Liaison with local ports and harbours during the construction phase. To minimise the risk introduced due to the presence of project vessels.
- Ongoing liaison with fishing fleets will be maintained via an appointed Fisheries Liaison Officer (FLO) and Fishing Industry Representative (FIR). Prior to construction, a Fisheries Liaison and Coexistence Plan (FLCP) will be developed, setting out in detail the planned approach to fisheries liaison and means of delivering any other relevant mitigation measures.
- To avoid direct impacts on sites of identified archaeological significance, the final cable routing, well drilling and platform construction will avoid any known archaeological constraints identified in pre-construction site investigation surveys through micro-siting.
- In line with industry practice, a Pipeline Specification and Installation Plan will be developed and adhered to, which will include pipeline burial where possible and pipeline protection as necessary. This is to ensure that the pipeline remains secure and is not a hazard to other sea users.
- To reduce greenhouse gases emission, the following measures will be put in place: fugitive emissions will be monitored through a Leak Detection and Repair programme as part of the preventative maintenance activities; vessel fuel consumption will be minimised by optimising vessel scheduling, with

consideration given to the co-ordination of activities and material delivery, controlling vessel speed, vessel age (not > 20 years old), and using only low-sulphur fuel; and the implementation of energy efficiency opportunities.
- Where operationally practical, nearshore works will be undertaken outside of the Bathing Season (15th May to 30th September inclusive) to reduce risks to bathers associated with contaminant releases.
- Require a Waste Management Plan by all Contractors and Subcontractors setting out details of all waste management procedures for their activities, details of expected waste arisings and procedures for waste management.

8.2 Mitigation or monitoring required to be attached to the consent (Regulation 22 (c)-(e))

8.2.1 In reaching the EIA Consent Decision required under Regulation 22, NRW must make consideration of the requirement for any mitigation measures or monitoring required to be attached to the consent.

8.2.2 Section 7 outlines where NRW considers that there is a requirement for mitigation and/or monitoring, and sets out the measures we consider necessary to address potential impacts identified through the EIA process. These are summarised below:

- Development and adherence to a Cable Specification and Installation Plan (CSIP) to set out appropriate cable burial depth in accordance with industry best practice, minimising the risk of cable exposure. The CSIP will also ensure that cable crossings are appropriately designed to mitigate environmental effects including through measures to reduce EMF emissions and impact on navigation systems caused by compass deviation. The CSIP will include a detailed Cable Burial Risk Assessment (CBRA) to enable informed judgements regarding burial depth to maximise the chance of cables remaining buried whilst limiting the amount of sediment disturbance to that which is necessary.
- Development and adherence to a Pipeline Specification and Installation Plan (PSIP) to set out appropriate pipeline burial depth and installation methods in accordance with industry best practice, minimising the risk of exposure. The PSIP will also ensure that cable crossings are appropriately designed to mitigate environmental effects.
- Development of and adherence to an Construction Environmental Management Plan (CEMP) that will confirm the timing, and duration of the construction of the Proposed Development, provide details on aspects of the methodology not known at the application stage and confirm that the methodology falls within the parameters assessed in the ES. The CEMP will provided the means of controlling specific environmental, health and safety risks that have been identified. The CEMP will include appendices including a Marine Pollution Contingency Plan (MPCP) that will include avoidance measures to reduce the potential risk for the release of pollutants, planning for accidental spills, address all potential contaminant releases and include key emergency contact details.
- Timing restrictions for the mitigation of impacts to features of the Liverpool Bay SPA restricting cable/pipeline laying and protection activities, and UXO clearance which could result in the highest disturbance to avoid the most sensitive months. In addition, the implementation of a Vessel Management Plan (VMP) to control

vessel movements during the most sensitive period (1st November – 31st March inclusive).

- Production and adherence to a Invasive Non-Native Species (INNS) and a Biosecurity Plan (the INNSMP), to ensure that potential impact as a result of spread of INNS is minimised or avoided.
- Production and adherence to a Marine Mammal Mitigation Protocol (MMMP) which will include measure to avoid and minimise impact of underwater noise during piling and UXO clearance activities. Mitigation will include implementation of piling initiation, soft-start, and ramp-up measures and to work in line with the *Marine environment: unexploded ordnance clearance Joint Position Statement (21 January 2025)* that will prioritise low order detonations as the first approach for UXO clearance activities.
- A Lighting and Marking Plan to ensure marking and lighting in accordance with relevant industry guidance of Offshore Platforms (OPs). The Applicant will also ensure the project is adequately marked on nautical charts.
- Promulgation of information advising on the nature, timing and location of activities, Safety Zones and advisory safe passing distances, including through Notices to Mariners.
- A Vessel Management Plan (VMP) will be developed which will determine vessel routing to and from construction areas and ports and to minimise disturbance to marine birds and mammals.
- Development of and adherence to a Navigational Safety Plan (NSP). The NSP will describe measures put in place by the Project related to navigational safety, including information on Safety Zones, charting, construction buoyage, temporary lighting and marking, and means of notification of Project activity to other sea users (e.g., via Notice to Mariners).
- A Dropped Objects Plan will be developed for reporting and recovery of dropped objects where they pose a potential hazard to other marine users.
- A Written Scheme of Investigations (WSI) will be developed which will include, but not limited to, a Protocol for Archaeological Discoveries (PAD) and establishment of Archaeological Exclusion Zones (AEZ) . The WSI will provide operational awareness of the location of archaeological anomalies identified as having a low potential. The PAD will provide a protocol for the recording of finds of archaeological interest.
- An Installed Cable Report and Post-Construction as-built Report will be required to be submitted indicating the final locations and technical specifications of cables and infrastructure identifying the potential dangers to navigation and measures proposed to ensure the safety.
- Where cables will be required to cross an active cable, it is required that a crossing agreement is entered into with the cable operator. Where a cable is inactive, the Applicant will consult with the cable operator to ascertain if such a crossing agreement is required.
- Production of SIMOPS in consultation with oil and gas operators and other energy infrastructure operators to promote and maximise cooperation between parties and minimise both spatial and temporal interactions between conflicting activities
- The requirement of a UXO method statement to ensure the proposed works follow best practice, have been assessed within the Environmental Statement and appropriate mitigation is in place to reduce environmental and navigational risk.

9 Regulation 21A Conclusion about Environmental Impact

9.0.1 In reaching a Conclusion about Environmental Impact, as required by Regulation 21A, NRW has considered the following (Regulation 21A(1)):

- The application for a marine licence
- The Environmental Statement submitted
- Further information provided, as outlined in section 3.3
- The responses to public consultation outlined in sections 4 and 7
- The responses to the technical consultation outlined in sections 6 and 7
- Any comments received from another EEA state, as outlined in section 5 and 7
- Any features of the project, or proposed measures, to avoid, prevent, reduce or offset any likely significant adverse environmental effects as outlined in section 8

9.0.2 NRW, as appropriate authority, has considered the likely significant effects of the project, and reached a conclusion of the likely significant effects of the project with regard to the following (Regulation 21A(2)):

Population and human health (9.1)
Biodiversity (9.2)
Land, soil, water, air and climate (9.3)
Material assets, cultural heritage and landscape (9.4)
Risk of major accidents and disasters relevant to the project (9.5)
Cumulative impacts and in-combination impacts (9.6)

9.1 Population and human health

9.1.1 The Proposed Development provides an action to address the climate change emergency and the urgent need for decarbonisation. The Project looks at reusing the depleted natural gas reserves in the Liverpool Bay Area fields to sequester carbon emissions from industrial sources in North Wales and the North West of England. Possible effects on air quality have been assessed and ruled out as not significant. Noise impacts of the wider project on human receptors has been fully assessed and will be controlled through conditions on the Planning Permission (FUL/000633/23). Pollution prevention and health and safety measures will also be controlled though the CEMP conditioned in the marine licence.

9.1.2 Possible impacts on commercial mussel and cockle beds in the vicinity of the Proposed Development have been fully assessed and no significant effect is expected.

9.1.3 Impacts on fishing activity and community will be mitigated by issuing appropriate notifications. Furthermore, the majority of the Proposed Development occurs within the existing 500m fishing exclusion zones of the Eni Operational infrastructure.

9.1.4 NRW is satisfied that by its nature the Proposed Development will provide beneficial outputs for population and human health. The risks to human health associated with

the proposed works are considered to be low and, with the proposed controls and mitigations such as the CEMP, the risk is negligible. NRW are satisfied that there will be no significant impact on population or human health as a result of the Project

9.2 Biodiversity

9.2.1 The works are within and near to a number of protected sites. As such a Habitat Regulation Assessment has been conducted which concluded that no adverse effects on the integrity of the protected sites was expected after mitigation is applied.

9.2.2 The ES considered potential impacts on biodiversity including birds, fish, benthic, marine mammals and physical processes, and considered that additional mitigation was required. NRW consider that although there is potential impact on these features, any significant impact can be avoided through the implementation of appropriate mitigation as detailed in section 8. These include: Construction Environmental Management Plan (CEMP), and Invasive Non Native Species Management Plan (INNSMP), a Marine Mammal Management Plan (MMMP), and a Vessel Management Plan (VMP).

9.2.3 NRW conclude that considering mitigation proposed within the ES and the licence conditions as outlined in section 8, no significant impact on biodiversity is predicted.

9.3 Land, soil, water, air and climate

9.3.1 The construction, operation, maintenance of the Proposed Development will not give rise to the production of hazardous waste. However, there is an impact pathway to water quality through an accidental pollution event. The ES has assessed impacts to land, soil, water, and air and proposed mitigation measures and adherence to best working practice to reduce the impacts. Mitigation measures include management of risks of accidental pollution events through Marine Pollution Contingency Plan (MPCP) and implementation of a CEMP. NRW consider that the works have been appropriately assessed and subject to the mitigation identified no significant impact on water quality or land is predicted.

9.3.2 With regards to Climate Change, it is considered that whilst there will be some moderate to minor adverse effect from GHG emissions from the manufacturing, transportation and installation of infrastructure, and from energy use during the operation of the Proposed Development, an important beneficial effect is expected from CO_2 transportation and long term storage by the Proposed Development.

9.4 Material assets, cultural heritage and landscape

9.4.1 The ES considered a number of impacts including direct impacts during construction activities and indirect impacts due to altered sediment or hydrological processes on cultural heritage assets. NRW consider that the works have been appropriately assessed and that considering mitigation proposed within the ES and the licence conditions outlined in section 8 will ensure no significant impact on cultural heritage and landscape. Mitigation include, production and adherence to a Written Scheme of Investigation which would include but not be limited to a PAD and establishment of an AEZ.

9.5 Risk of major accidents and disasters relevant to the project

9.5.1 Due to the heavily trafficked area, there is an increased potential of vessel to vessel collision or vessel to platform allision risk. The risks are mitigated through conditions including notifications and the VMP as stated in section 8.

9.5.2 Due to the nature and scale of the operation, the risk of a major accident or disaster is low. In addition, sufficient pollution prevention measures have been proposed to reduce the risk of a major accident or pollution event.

9.6 Cumulative impacts and in-combination impacts

9.6.1 NRW concluded that the potential impacts due to the project have been adequately addressed in the ES. As detailed in section 3.2.3, NRW carried out a Habitat Regulation Assessment and Water Framework Directive compliance assessment and concluded that, subject to appropriate mitigation, the works would not cause a significant impact alone or in combination on any designated sites. NRW are satisfied that cumulative impacts have been adequately addressed in the ES and that no significant cumulative and in-combination assessment effects are predicted..

Produced By: Maria Alvarez

Signed:
Date: 21 May 2025

Approved by: Emmer Litt
Signed:

Date: 21 May 2025

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10 Regulation 22 EIA Consent Decision

10.0.1 The Marine Licensing Team has considered the application CML2365 and information provided in support of the application and is now in a position to make an EIA consent decision to Liverpool Bay SSC Ltd.

10.0.2 In accordance with Regulation 22 of the Regulations, NRW, as appropriate authority, have considered:

- The application for a marine licence
- The Environmental Statement submitted
- Further information provided, as outlined in section 3.3
- The Conclusion about Environmental Impact (under Regulation 21A(2)) in section 9 (07 April 2025), which we consider to be up to date
- The responses to public consultation outlined in sections 4 and 7
- The responses to the technical consultation outlined in sections 6 and 7
- Any comments received from another EEA state, as outlined in section 5 and 7
- Whether monitoring of the significant adverse environmental effects of the Project is appropriate (as outlined in section 8), including whether
    - Existing monitoring can be relied upon
    - Conditions should be attached to the regulatory approval
    - Whether conditions to make provision for potential remedial action are required, as outlined in section 8
    - Whether any other conditions need to be attached to the regulatory approval, with respect to the likely significant environmental effects of the Project, as outlined in section 8.

10.0.3 After conducting a full and comprehensive review of the Project and applying appropriate additional external expertise, we conclude that the environmental impacts of the Project have been adequately identified, described and assessed. Accordingly, we conclude a favourable determination and that EIA consent for the project should be given.

10.0.4 Adequate mitigation strategies have been agreed to minimise, or altogether remove, the potential significant impacts associated with the construction and operational phases of the Project.

10.0.5 We consider that the monitoring and mitigation conditions outlined in section 8 should be considered in the regulatory decision.

10.1 This Written Confirmation of the EIA Consent Decision will be sent to the following, in accordance with Regulation 23 of the Regulations:

- Liverpool Bay CCS Ltd.
- Any person from whom NRW received representation arising from the consultation described in section 4
- Any EEA states consulted (see section 5)

- All consultation bodies listed in section 6

10.2 This Written Confirmation of the EIA Consent Decision is available on the NRW online public register at Public register - Customer Portal

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Produced By: Maria Alvarez

Signed: 

Date: 07 April 2025

Approved by:
Signed:
Date:

ANNEX 1 – List of documents submitted

Title/Description of Document	Date Submitted
Environmental Statement Submission – accepted 15 March 2024	
CML2365 - Crossing GA for Douglas to Hamilton DHNX-1 and 6-105600BSDP84915_CDFE01_01.pdf	07 November 2023
CML2365 - Crossing GA for Douglas to Lennox DLX-1 and DLX-6-105600BSDP84917_CDFE01_01.pdf	07 November 2023
CML2365 - Douglas jacket and piles-structural materials quantities-105600BOEB90120_CDFE01_15.pdf	07 November 2023
CML2365 - Douglas Jacket-foundation piles details-105600BODE90136_CDFE01_01.pdf	07 November 2023
CML2365 - Douglas jacket-mud mat details-105600BODE90139_CDFE01_01_02.pdf	07 November 2023
CML2365 - Douglas jacket-mud mat details-105600BODE90139_CDFE01_02_02.pdf	07 November 2023
CML2365 - Douglas jacket-pile sleeves details-105600BODE90137_CDFE01_01_02.pdf	07 November 2023
CML2365 - Douglas jacket-pile sleeves details-105600BODE90137_CDFE01_02_02.pdf	07 November 2023
CML2365 - Douglas jacket-riser details-105600BODE90145_CDFE01_01_04.pdf	07 November 2023
CML2365 - Douglas jacket-riser details-105600BODE90145_CDFE01_02_04.pdf	07 November 2023
CML2365 - Douglas jacket-riser details-105600BODE90145_CDFE01_03_04.pdf	07 November 2023
CML2365 - Douglas jacket-riser details-105600BODE90145_CDFE01_04_04.pdf	07 November 2023
CML2365 - Douglas platform installation method statement - 105600BNMI85023_CDFE01_62.pdf	07 November 2023
CML2365 - Douglas platform location and pipelines and cables connections-105600BSDN84020_CSFS00_01.pdf	07 November 2023

CML2365 - Douglas platform overall layout-105600BTDG62100_CDFE03_01.pdf	07 November 2023
CML2365 - Douglas to Hamilton Main Alignment Sheets-1025DSBSDG84144_CDFE02_03.pdf	07 November 2023
CML2365 - Douglas to Hamilton North Alignment Sheets-1025DSBSDG84142_CDFE02_03.pdf	07 November 2023
CML2365 - Douglas to Lennox Alignment Sheets-1025DSBSDG84143_CDFE02_07.pdf	07 November 2023
CML2365 - Douglas to Satellites Approach Drawings-1025H0BSDN84112_CDFE06_02.pdf	07 November 2023
CML2365 - LBA CCS Ltd - PA2211-marine-works-application-form-FINAL - signed.pdf	07 November 2023
CML2365 - LBA CCS Ltd-ES Details FINAL.pdf	07 November 2023
CML2365 - LBA CCS Ltd-ML Application - Attachment 12(A) NRW Correspondence-FINAL.pdf	07 November 2023
CML2365 - LBA CCS Ltd-ML Application - Attachment 6(B)1 Red Line Boundary-FINAL.pdf	07 November 2023
CML2365 - LBA CCS Ltd-ML Application - Attachment 6(B)2 Area of Physical Works-FINAL.pdf	07 November 2023
CML2365 - LBA CCS Ltd-ML Application-Attachment - 8(a) Materials estimate-FINAL.pdf	07 November 2023
CML2365 - LBA CCS Ltd-OFFSHORE-EIA-Summary of Project-FINAL.pdf	07 November 2023
CML2365 - New Douglas pipeline connections study-105600BSRV84156_CDFE01_18.pdf	07 November 2023
CML2365 - New Douglas pipeline spools approach drawings-105600BSDN84152_CDFE03_03.pdf	07 November 2023
CML2365 - New Douglas pipeline spools tie-in drawings-105600BSDN84154_CDFE02_03.pdf	07 November 2023
CML2365 - New Douglas pipelines spools preliminary crossings report-1023DSBSRV84019_CDFE02_49.pdf	07 November 2023
CML2365 - Offshore cables preliminary Crossing Design Report-1025DSBSCZ84173_CDFE03_41.pdf	07 November 2023

CML2365 - OFFSHORE POWER CABLE PROTECTION REQUIREMENT-1025H0BSRV84107_CDFE06_43.pdf	07 November 2023
CML2365 - PA2211 – Marine Licence application - HyNet Carbon Dioxide Transportat.msg	07 November 2023
CML2365 - PoA to Douglas and Satellites Offshore cable installation procedure-1023DSBNMI85016_CDFE02_91.pdf	07 November 2023
CML2365 - PoA to Douglas Cable protection for crossings PoAX-4 and 5 and 6-1025HTBSDG84176_CDFE03_02.pdf	07 November 2023
CML2365 - PoA to Douglas power and FO cable Nearshore installation procedure-1025HTBNMI85019_CDFE02_95.pdf	07 November 2023
CML2365 - PoA to Douglas power cable 01 Alignment Sheets-1025H0BSDG84110_CDFE03_01 to 07_Signed ALL.pdf	07 November 2023
CML2365 - PoA to Douglas power cable 02 Alignment Sheets-1025H0BSDG84141_CDFE02_01 to 07.pdf	07 November 2023
CML2365 - Power and FO cable field layout plans-1025H0BSDG84104_CDFE10_02.pdf	07 November 2023
CML2365 - Proposed Development and Designated Sites.pdf	07 November 2023
CML2365 - Proposed Development and existing O&G licence blocks.pdf	07 November 2023
CML2365 - Proposed Development and Protected Subtidal Sites.pdf	07 November 2023
CML2365 - Proposed Development Location Map.pdf	07 November 2023
CML2365 - Proposed Development nearshore approaches.pdf	07 November 2023
CML2365 - Technical 8.1.02 - 52967-MET-009 - Example Spool Installation Method Statement.pdf	07 November 2023
CML2365 - Technical 8.1.04 - 52967-MET-011 - Example Spool and Mat Installation Method Statement.pdf	07 November 2023
CML2365 Fitness Checks applicant response.msg	07 November 2023

CML2365 Fitness Checks outcome application accepted.msg	07 November 2023
CML2365 Fitness Checks outcome to applicant.msg	07 November 2023
CML2365 Changes to documents summary and Annex 6(c).msg	07 November 2023
CML2365 LBA CCS Ltd-ML Application-Attachment -6(c) Supporting documentation.FIN.pdf	18 March 2024
CML2365 PoA to Douglas Cable protection for crossings PoAX-1-1025HTBSDG84174_CDFE03_01.pdf	07 November 2023
CML2365 PoA to Douglas Cable protection for crossings PoAX-2 and 3-1025HTBSDG84175_CDFE03_01.pdf	07 November 2023
CML2365 PoA to Douglas Cable protection for crossings PoAX-7 and 8-1025HTBSDG84177_CDFE03_01.pdf	07 November 2023
CML2365-LBA CCS Ltd_ES_Appendix A_SR_NRW_FINAL.pdf	28 February 2024
CML2365-LBA CCS Ltd_ES_Appendix B_SO_NRW_FINAL.pdf	28 February 2024
CML2365-LBA CCS Ltd_ES_Appendix C1_AQ_NRW_FINAL.pdf	28 February 2024
CML2365-LBA CCS Ltd_ES_Appendix C2-AR_NRW_FINAL.pdf	28 February 2024
CML2365-LBA CCS Ltd_ES_Appendix C3-SLVIA_NRW_FINAL.pdf	28 February 2024
CML2365-LBA CCS Ltd_ES_Appendix D_MPC_NRW_FINAL.pdf	28 February 2024
CML2365-LBA CCS Ltd_ES_Appendix E_EM&MC_NRW_FINAL.pdf	28 February 2024
CML2365-LBA CCS Ltd_ES_Appendix F_CEA_NRW_FINAL.pdf	28 February 2024
CML2365-LBA CCS Ltd_ES_Appendix G_TIS_NRW_FINAL.pdf	28 February 2024
CML2365-LBA CCS Ltd_ES_Appendix H_PP TR_NRW_FINAL.pdf	28 February 2024

CML2365-LBA CCS Ltd_ES_Appendix I_MBTR_NRW__FINAL.pdf	28 February 2024
CML2365-LBA CCS Ltd_ES_Appendix I1_MB ST_NRW_FINAL.pdf	28 February 2024
CML2365-LBA CCS Ltd_ES_Appendix I2_MB IT_NRW_FINAL.pdf	28 February 2024
CML2365-LBA CCS Ltd_ES_Appendix J_UWN TR_NRW_FINAL.pdf	28 February 2024
CML2365-LBA CCS Ltd_ES_Appendix K1_OOB TR_NRW_FINAL.pdf	28 February 2024
CML2365-LBA CCS Ltd_ES_Appendix K2_OOD TR_NRW_FINAL.pdf	28 February 2024
CML2365-LBA CCS Ltd_ES_Appendix K3_OOI_NRW_FINAL.pdf	28 February 2024
CML2365-LBA CCS Ltd_ES_Appendix K4_LT FTR_NRW_FINAL.pdf	28 February 2024
CML2365-LBA CCS Ltd_ES_Appendix L_NRA TR_NRW_FINAL.pdf	28 February 2024
CML2365-LBA CCS Ltd_ES_Appendix M_CF TR_NRW_FINAL.pdf	28 February 2024
CML2365-LBA CCS Ltd_ES_Appendix N_MA TR_NRW_FINAL.pdf	28 February 2024
CML2365-LBA CCS Ltd_ES_Appendix O_GHG_NRW_FINAL.pdf	28 February 2024
CML2365-LBA CCS Ltd_ES_Appendix P_RIAA_NRW_FINAL.pdf	28 February 2024
CML2365-LBA CCS Ltd_ES_Appendix Q_WFD_NRW_FINAL.pdf	28 February 2024
CML2365-LBA CCS Ltd_ES_CH10_CF_NRW_FINAL.pdf	28 February 2024
CML2365-LBA CCS Ltd_ES_CH11_MARCH_NRW_FINAL.pdf	28 February 2024
CML2365-LBA CCS Ltd_ES_CH12_IOSU_NRW_FINAL.pdf	28 February 2024
CML2365-LBA CCS Ltd_ES_CH13_CC_NRW_FINAL.pdf	28 February 2024

CML2365-LBA CCS Ltd_ES_CH14_IRE_NRW_FINAL.pdf	28 February 2024
CML2365-LBA CCS Ltd_ES_CH6_PP_NRW_FINAL.pdf	28 February 2024
CML2365-LBA CCS Ltd_ES_CH7_MB_NRW_FINAL.pdf	28 February 2024
CML2365-LBA CCS Ltd_ES_CH8_OO_NRW_FINAL.pdf	28 February 2024
CML2365-LBA CCS Ltd_ES_CH9_SN_NRW_FINAL.pdf	28 February 2024
CML2365-LBA CCS Ltd_ES_ToC_NRW_FINAL.pdf	28 February 2024
CML2365-LBA CCS Ltd_OFFSHORE ES_Appendix R EMP_NRW_FINAL.pdf	07 November 2023
CML2365-LBA CCS Ltd_OFFSHORE ES_Appendix S MMMP_NRW_FINAL.pdf	07 November 2023
CML2365-LBA CCS Ltd_OFFSHORE ES_Appendix T INNS_NRW_FINAL.pdf	07 November 2023
CML2365-LBA CCS Ltd_OFFSHORE ES_Appendix U WSI_NRW_FINAL.pdf	07 November 2023
CML2365-LBA CCS Ltd_Offshore ES_CH1-5_INTRO_NRW-UPDATE.pdf	07 November 2023
CML2365-LBA CCS Ltd_OFFSHORE ES_NTS_NRW-FINAL.pdf	07 November 2023
Further Information Submission – 26 July 2024	
CML2365 A4814 ENI Hynet CCS NRA_Rev04 Further Information	26 July 2024
CML2365 Consultation log to applicant-Rev_2.0.26.07.2024 Further Information	26 July 2024
CML2365 EHE7228B_TN_MM_Rev02 Further Information	26 July 2024
CML2365 MC000025_TN_Benthic_MBTN01_Rev02 Further Information	26 July 2024
CML2365 MC000025_TN_Fish_MBTN02_Rev02 Further Information	26 July 2024
CML2365 MC000025_TN_RIAA_MBTN04_Rev02 Further Information	26 July 2024

CML2365 EHE7228B_LB_HYNET_ES_CH09_SN_FINAL_For Submission_Rev01 Further Informat	26 July 2024
CML2365 HyNet Offshore consultation by PoM 14 May 2024 - Eni Response DRAFT v2.0	26 July 2024
CML2365 WAE02282_TN_Physical_Processes_Rev01a Further Information	26 July 2024
CML2365 HyNet Project-wide Environmental Effects Report Further Information	26 July 2024
Further Clarifications Submission – 06 November 2024	
CML2365 Further Clarification response November 2024	06 November 2024
Realignment Application – 05 & 07 February 2025	
CML2365 Marine Licence Re-purposed Pipelines Lengths-04.02.2025	05 February 2025
CML2365 MC000025_ENI_Hynet_RevisedDevelopmentArea_WelshWaters_Coordinates_250206	07 February 2025
CML2365 LB CCS-Cable Realignment Technical Note-07.02.2025	07 February 2025