

NRW Permitting Service consideration of public representations under Schedule 5 of the Marine Works (EIA) Regulations 2007

Application Reference	CML2365
Applicant Name	Liverpool Bay CCS Limited
Project name, location and general description	Hynet Carbon Dioxide Transportation and Storage Project – Liverpool Bay
Details of Public Advertisement	Daily Post on the 12 and 19 April 2024
Details of advertisement for Further Information	Daily Post on the 12 and 19 August 2024
Realignment application public advertisement	Daily Post on the 17 and 24 February 2025
Location of documents available to the public for all consultations	• Online on NRW public register • Flint Library, Church Street, Flint, CH6 5AP

Representation 1	
Name of person making representation	Rhyl Flats Wind Farm (OWF) Ltd. (RWE)
Date representation made	22 May 2024
Summary of concerns: 1. Rhyl Flats WF Ltd requests that Simultaneous Operations (SIMOPS) Protocols are agreed prior to commencement of any works. This will ensure that construction and maintenance of the HyNet project do not adversely affect the routine and emergency operational movements of the wind farm maintenance vessels to and from Port of Mostyn.	
NRW Permitting Service Consideration of this representation: 1. (a) NRW consider that this representation is capable of being dealt with through Schedule 5.	

(b) NRW consider that this representation is relevant to the EIA Consent Decision

(c) This representation is capable of being dealt with through arrangement with the applicant. The applicant has been in touch with the Rhyl Flats WF operators who have confirmed (within representation dated 16 December 2024) that a SIMOPS will be achievable and put in place as required. NRW will condition the need to submit an agreed **SIMOPS** to the Licensing Authority before commencement of works.

(d) NRW do not consider that the representation gives rise to a dispute to resolve a question of fact as **SIMOPS** are achievable and will be required by conditions in the licence. Therefore the MLT will have such regard for this representation when considering the EIA consent decision.

NRW PS have consider the representation received and consider that the material issues highlighted and the extent to which they have been addressed are detailed in the EIA Written Confirmation of the EIA consent Decision.

Representation 2

Name of person making representation

Gwynt y Môr Offshore WF (OWF) Ltd. (RWE)

Date representation made

22 May 2024

Summary of concerns:

1. Gwynt y Môr OWF Ltd. requests that **Simultaneous Operations (SIMOPS)** Protocols are agreed prior to commencement of any works. This will ensure that construction and maintenance of the HyNet project do not adversely affect the routine and emergency operational movements of the wind farm maintenance vessels to and from Port of Mostyn.
2. The proposed works would necessitate the crossing of the interlink cable which connects the two array areas which comprise the Gwynt y Môr OWF. Gwynt y Môr OWF Ltd. will require a **Cable Crossing Agreement** to be entered into in respect of this crossing. This agreement should appropriately manage and mitigate any overlapping operations.

1. Simultaneous Operations

NRW Permitting Service Consideration of this representation:

(a) NRW consider that this representation is capable of being dealt with through Schedule 5.

(b) NRW consider that this representation is relevant to the EIA Consent Decision

(c) This representation is capable of being dealt with through arrangement with the applicant. The applicant has been in touch with the Gwynt y Môr

OWF operators who have confirmed (within representation dated 16 December 2024) that a **SIMOPS** will be achievable and put in place as required. NRW will condition the need to submit an agreed SIMOPS to the Licensing Authority before commencement of works.

(d) NRW do not consider that the representation gives rise to a dispute to resolve a question of fact as SIMOPS are achievable and will be required by conditions in the licence. Therefore NRW will have such regard for this representation when considering the EIA consent decision.

2. Cable Crossing

NRW Permitting Service Consideration of this representation:

(a) NRW consider that this representation is capable of being dealt with through Schedule 5.

(b) NRW consider that this representation is relevant to the EIA Consent Decision.

(c) This representation is capable of being dealt with through arrangement with the applicant. The Applicant indicates that a draft Cable Crossing Agreement was submitted to RWE in October 2024. RWE confirmed on the 27 March 2025 that the agreement is under review. NRW will condition the need to submit an agreed Cable Crossing Agreement to the Licensing Authority before commencement of works.

(d) NRW do not consider that the representation gives rise to a dispute to resolve a question of fact as Cable Crossing Agreements are achievable and will be required by conditions in the licence. Therefore NRW will have such regard for this representation when considering the EIA consent decision.

NRW have consider the representation received and consider that the material issues highlighted and the extent to which they have been addressed are detailed in the EIA Written Confirmation of the EIA consent Decision.

Representation 3

Name of person making representation	North Hoyle Wind Farm (OWF) Ltd. (RWE)
Date representation made	22 May 2024
Summary of concerns:	
1. North Hoyle OWF Ltd. requests that Simultaneous Operations (SIMOPS) Protocols are agreed prior to commencement of any works. This will ensure that construction and maintenance of the HyNet project do not adversely affect the routine and emergency operational movements of the wind farm maintenance vessels to and from Port of Mostyn. 2. The proposed works would necessitate to cross the North Hoyle OWF cable and the North Hoyle OWF Ltd. will require a Cable Crossing Agreement to be	

entered into in respect of this crossing. This agreement should appropriately manage and mitigate any overlapping operations.

1. Simultaneous Operations

NRW Permitting Service Consideration of this representation:

- (a) NRW consider that this representation is capable of being dealt with through Schedule 5.
- (b) NRW consider that this representation is relevant to the EIA Consent Decision
- (c) This representation is capable of being dealt with through arrangement with the applicant. The applicant has been in touch with RWE, the North Hoyle OWF operators, who have confirmed (representation dated 16 December 2024) that a **SIMOPS** will be achievable and put in place as required. NRW will condition the need to submit an agreed SIMOPS to the Licensing Authority before commencement of works.
- (d) NRW do not consider that the representation gives rise to a dispute to resolve a question of fact as SIMOPS are achievable and will be required by conditions in the licence. Therefore NRW will have such regard for this representation when considering the EIA consent decision.

2. Cable Crossing Agreement

NRW Permitting Service Consideration of this representation:

- (a) NRW consider that this representation is capable of being dealt with through Schedule 5.
- (b) NRW consider that this representation is relevant to the EIA Consent Decision.
- (c) This representation is capable of being dealt with through arrangement with the applicant. The applicant confirmed on the 26 March 2025 that the Cable Crossing Agreement is under negotiation. NRW will condition the need to submit an agreed Cable Crossing Agreement to the Licensing Authority before commencement of works.
- (d) NRW do not consider that the representation gives rise to a dispute to resolve a question of fact as Cable Crossing Agreements are achievable and will be required by conditions in the licence. Therefore NRW will have such regard for this representation when considering the EIA consent decision.

NRW have consider the representation received and consider that the material issues highlighted and the extent to which they have been addressed are detailed in the EIA Written Confirmation of the EIA consent Decision.