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**Sent:** 15 June 2023 10:40  
**To:** Hynet CO2 Pipeline <[hynetco2pipeline@planninginspectorate.gov.uk](mailto:hynetco2pipeline@planninginspectorate.gov.uk)>  
**Subject:** Re: Hynet DCO - NRW comments on the developer's proposed change request 1

Dear Sirs,

Thank you for consulting Natural Resources Wales regarding Change Request 1 of the HyNet CO2 pipeline NSIP application. Here are NRW's comments in respect of the same:

We note that Proposed Change 13 would remove the Public Right of Way and associated land plots adjacent to the Hawarden Embankment (adjacent to the River Dee main river) and have no objection to this. However, Proposed Change 13 would not remove NRW's concerns about avoiding any physical impediment during the construction phase in light of its statutory Flood Risk Management powers, as the temporary construction compounds adjacent to the River Dee at this location (Work No. 30D - Temporary Logistics and Construction Compound, Work No. 31A - Temporary Logistics and Construction Compound and Work No. 31C – Temporary Working Area) are still proposed. NRW's current concerns relate to these compound locations and associated access routes. In particular, Work No. 30D could affect NRW's access to the Northern Embankment as it uses the road going through the compound to access the embankment. Work No. 31A could affect NRW's access to the Hawarden Embankment, as the compound itself is located very close to the embankment and the access route serving the compound is the only means of accessing this section of the defence.

Please see NRW's Written Representation (REP1-071; see paragraphs 3.3 to 3.5), Deadline 2 submission (REP2-053) and Statement of Common Ground with the Applicant [REP3-026, see Items NRW 3.4.3 and 3.4.5] for details of NRW's concerns regarding to access to flood risk management assets. In addition, a request was made by NRW by email dated 5 June for these concerns around this issue to be the subject of discussion in the ISH on environmental matters on 6 June. However, this was not brought to the panels' attention. NRW will nevertheless provide further comments at Deadline 4 and continue to engage with the Applicant regarding this matter with a view to hopefully agree matters and record such agreement in the Statement of Common Ground.

Regarding Proposed Change 2 we have advised the Applicant to refer to NRW's website for standing advice on ancient woodland ([Natural Resources Wales / Advice to planning authorities considering proposals affecting ancient woodland](#)) and liaise with Flintshire County Council's ecologist regarding this topic and have no further comments.

Regarding the other proposed changes, where these could affect environmental interests within Wales, NRW has no new concerns or comments to raise.

I would be grateful if you could acknowledge receipt of these comments and confirm that they have been brought to the Examining Authority's attention

Yn gywir / yours faithfully,

**Emyr Gwyn**  
Uwch Gyfreithiwr Arbenigol / Senior Specialist Lawyer  
Cyfoeth Naturiol Cymru / Natural Resources Wales

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