



LIVERPOOL BAY CCS LIMITED COMMENTS ON FRODSHAM SOLAR DCO (PINS REF: EN010153) DEADLINE 5 RESPONSE

Runcorn Carbon Dioxide Spur Pipeline Proposed Development

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1. INTRODUCTION

1.1. PURPOSE OF THIS DOCUMENT

- 1.1.1. This document has been prepared on behalf of Liverpool Bay CCS Limited ('LBCCS'), the promoter of the Runcorn Carbon Dioxide Spur Pipeline ("Proposed Development") planning application.
- 1.1.2. Its purpose is to provide LBCCS's responses to the Deadline 4 submissions made in connection with the Frodsham Solar Development Consent Order (DCO) (PINS Ref: EN010153). These responses form part of LBCCS's Deadline 5 submission, dated 26th March 2026.

2. LBCCS DEADLINE 5 SUBMISSION

- 2.1.1. This section sets out LBCCS's responses to documents submitted at Deadline 4 on 5th March 2026, forming part of LBCCS's Deadline 5 submission (26th March 2026). Responses are provided at Table 1-1 below.

Table 2-1 – LBCCS Response to Deadline 4 documents

Document / Respondent	Paragraph Reference	LBCCS's Response
<p>Natural England (REP4 – 069)</p> <p>Natural England's advice at Deadline 4</p>	<p>Paragraph 1.1.6 - In-combination effects</p>	<p>LBCCS welcomes the comments provided by Natural England at Deadline 4 (paragraph 1.1.6), which confirm that they are comfortable with the Runcorn Spur Pipeline HRA and the current position of the application.</p> <p>Natural England confirms that the in-combination effects can be appropriately mitigated through the establishment of a joint working group and the preparation of detailed Construction Environmental Management Plans, to be agreed at the appropriate time as a requirement for both schemes. LBCCS agrees to the preparation of a detailed CEMP, which shall establish an engagement strategy with relevant stakeholders, to ensure that in-combination effects are appropriately managed and mitigated.</p> <p>Natural England also notes that <i>“where there is any delay to the pipeline construction and as a result the pipeline works cannot be completed ahead of the NBBMA construction works then this will need to be considered further under a revised HRA for the CO2 pipeline planning application at that time”</i>. Natural England's previous position has therefore been superseded.</p>
<p>Cubico (REP4-053)</p> <p>Cumulative Assessment of the Proposed Development with the CO2 Runcorn Spur Pipeline Scenario 3 – Pipeline Construction after development of Frodsham Solar (March 2026)</p>	<p>Paragraph 5.1.2/ 5.1.3</p>	<p>LBCCS considers that the Natural England response provided at Deadline 4 (paragraph 1.1.6) has superseded the Applicant's position. Natural England confirms that it has no continuing concerns regarding the in-combination assessment presented in the HRA.</p>
<p>Cheshire West and Chester Council (REP4- 066)</p> <p>Any Other Information Requested from EXA for Deadline 4 – from CWCC [CWCC's written response to CAH1 and ISH2 Action points (March 5)]</p>	<p>Table 2: ISH2 Action Points (Action Point 39)</p>	<p>LBCCS anticipates that a determination will be issued prior to a decision being reached on the Frodsham Solar DCO and will maintain ongoing engagement with CWCC pending that decision.</p> <p>CWCC has indicated that a further extension of time is likely to be requested beyond the May 2026 committee, pending receipt of comments from Natural England and CWCC's Natural Environment officer and the subsequent opportunity for LBCCS to address these.</p> <p>LBCCS is still awaiting comments from CWCC's Natural Environment officer. As CWCC has advised that these comments will not be available until April 2026, and therefore their position is currently unknown, this is limiting LBCCS' engagement in the Frodsham DCO Solar Examination.</p>

LBCCS's Position on Protective Provisions

LBCCS maintains that protective provisions must be included in the Frodsham Solar Project DCO to safeguard the Runcorn Spur Pipeline Proposed Development. This position is consistent with, and should be read alongside, the matters set out in LBCCS's Relevant Representation for the Frodsham Solar Project DCO [RR-011].