

Date: 30 April 2026
Our ref: 541075
Your ref: 25/02108/FUL



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Cheshire West and Chester Council

BY EMAIL ONLY

Customer Services
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Dear █████,

Planning consultation: Proposed construction of a new carbon dioxide spur pipeline, an Above Ground Installation (AGI), plus ancillary works and equipment to serve Viridor Energy from Waste (EfW) Facility Carbon Capture Plant at Runcorn Carbon Dioxide Spur Pipeline

Thank you for your consultation on the above, dated and received by Natural England on 11 February 2026.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Apologies for the delay in providing this advice to you. This letter confirms Natural England's advice with regards to the LBCCS Clarification to Natural England on Runcorn Spur Pipeline Proposed Development Soil Stabilisation Note, submitted by the applicant dated 28 January 2026.

Summary of Natural England's advice

In summary, Natural England advises that insufficient information has been provided to inform the conclusions of the Habitats Regulations Assessment.

Further information is required to demonstrate that the proposed development will not impact on existing mitigation land for the Frodsham Wind Farm and/or have an impact on mitigation proposed as part of the Frodsham Solar Farm Development Consent Order (DCO) which may impact on SPA bird populations outside of the designated sites.

Internationally and nationally designated sites

The application site is at its closest point within 100m of the Mersey Estuary Special Protection Area (SPA), Ramsar and Site of Special Scientific Interest (SSSI).

In considering the European site interest, Natural England advises that you, as a competent authority under the provisions of the Habitats Regulations, should have regard for any potential impacts that a plan or project may have. The [Conservation Objectives](#) for each European site explain how the site should be restored and/or maintained and may be helpful in assessing what, if any, potential impacts a plan or project may have.

Natural England has also published [Conservation Advice Packages](#) which provide additional detailed information on Marine Protected Areas.

Please see the subsequent sections of this letter for our advice relating to SSSI features.

Habitats Regulations Assessment (HRA)

Natural England has reviewed the information provided by the applicant within the LBCCS Clarification to Natural England on Runcorn Spur Pipeline Proposed Development Soil Stabilisation Note. We note that this information has been provided to support the conclusions of the applicant's HRA (Habitats Regulations Assessment, dated July 2025 by ENI).

As competent authority, it is your responsibility to produce the HRA and be accountable for its conclusions. We provide the advice enclosed on the assumption that your authority intends to adopt this HRA to fulfil your duty as competent authority.

Natural England notes that an appropriate assessment of the proposal has been undertaken in accordance with regulation 63 of the Conservation of Species and Habitats Regulations 2017 (as amended). Natural England is a statutory consultee on the appropriate assessment stage of the Habitats Regulations Assessment process, and a competent authority should have regard to Natural England's advice.

The appropriate assessment concludes that your authority is able to ascertain that the proposal will not result in adverse effects on the integrity of any of the sites in question.

Having considered the assessment and the information provided with this consultation, Natural England's advice is that the assessment is not sufficiently rigorous or robust to justify this conclusion. We advise that your authority should not adopt this HRA and that you should not grant planning permission at this stage.

We advise that the below additional work on the assessment is required to enable it to be sufficiently rigorous and robust. Natural England should be re-consulted once this additional work has been undertaken and the appropriate assessment has been revised.

Additional information required

As advised previously Natural England's main ongoing concern regarding this development relates to the potential for operational impacts of the section of pipeline that is planned within Cell 3 of the Frodsham dredging lagoons, this area is secured as mitigation land for SPA birds under the planning permission for the Frodsham Wind Farm and is proposed as mitigation land within the Frodsham Solar Farm DCO which includes an expansion of the wetland area within the site.

On review of the information provided with this consultation Natural England advises that the advice in our previous letter (ref. 524950, dated 18 December 2025) still stands.

It is noted that the approach to soil stabilisation has been designed to minimise hydrological impact by enabling movement between and around columns, and where the soil stabilisation occurs this may have the effect of allowing hydrological movement. However, it is unclear from the information provided whether this would limit the impacts on water movement or whether this may further contribute toward site dryness and therefore impact upon habitats within the Cell 3 mitigation area and, when considered along with the Frodsham Solar DCO, the creation of the NBBMA and the wetland habitats being proposed as mitigation under that scheme.

Natural England advises that further information is required to rule out potential effects as a result of the pipeline within these mitigation areas. We advise that the applicant submits information that assesses the impacts of the pipeline including the impact of excavation for laying the pipeline and the creation of the stabilisation columns on hydrology (both movement and water level) and in turn any resulting impacts on SPA supporting habitats.

Mersey Estuary SSSI

Our concerns regarding the potential impacts upon the SSSI coincides with our concerns regarding the potential impacts upon the international designated sites and so are set out above.

Please note that if your authority is minded to grant planning permission contrary to the advice in this letter, you are required under Section 281 (6) of the Wildlife and Countryside Act 1981 (as

amended) to notify Natural England of the permission, the terms on which it is proposed to grant it and how, if at all, your authority has taken account of Natural England's advice. You must also allow a further period of 21 days before the operation can commence.

If you have any queries relating to the advice in this letter, please contact me on the details below. For any new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.

Please consult us again once the information requested above has been provided.

Yours sincerely,

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