



Frodsham Solar

Natural England response to Liverpool Bay CCS Limited 21
August 2026

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Cheshire West and Chester Council

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BY EMAIL ONLY

Dear Ed,

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
Location: Land At Cross Lane Frodsham

Thank you for your consultations regarding the above proposed development.

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.

Natural England have previously provided advice regarding this development (our ref. 541075 and 521098), however since we provided our earlier advice we have engaged with both you and the applicant's consultants (via our Discretionary Advice Service (DAS)) to understand the details of the planning application further which has helped inform our advice. This letter details our updated advice based on our current understanding of the proposed development.

Summary of Natural England's advice

In summary, Natural England advises that providing the proposed development is carried out in line with the submitted application documents and with appropriate mitigation measures being secured by the planning permission we have no objections to the proposed development.

There are however amendments required to the Habitats Regulations Assessment (HRA) prior to adoption by your authority and planning permission being granted. Natural England expects further consultation on an updated HRA in order to conclude our advice to your authority.

Please note that the advice in this letter is based upon the timescales of the proposed development as described by the applicant and we have provided further comments below to outline the basis of our advice.

Internationally and nationally designated sites

The proposed development 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)

As you are aware Natural England's main ongoing concern regarding the proposed development relates to the section of pipeline that crosses the area known as Cell 3. Cell 3 forms part of the mitigation package which is in place for the Frodsham Wind Farm and is currently providing specific mitigation for SPA birds.

We also had concerns regarding the potential new mitigation area encompassing Cell 3 and adjacent areas being proposed by the Frodsham Solar Farm Development Consent Order (DCO). It is acknowledged that the DCO for the Frodsham Solar Farm has not yet been decided and full details regarding the proposed mitigation for the development are not yet known.

In view of the statements made by the applicant regarding the expected timelines for the proposed development (i.e. the pipeline will be constructed ahead of the Frodsham Solar Farm and its associated mitigation area) we consider that this avoids any overlapping construction impacts between the two developments. It also limits the extent of any operational (or post development) impacts that can be considered at this stage within the HRA.

We consider that where the pipeline is constructed and completed ahead of the solar development commencing then there is no further requirement to assess the any post development interactions at this stage. Please see our further advice below regarding changes to the timeline of the development.

There is still a requirement however for the HRA to consider impacts from the pipeline on the existing wind farm mitigation and we advise the applicant's HRA (Document Reference Number RU.4.4, dated July 2025) is updated in order for it to be sufficiently robust for your authority to adopt. We have provided advice directly to the applicant as part of our DAS discussions on the required updates to the HRA and expect to be reconsulted once an updated HRA has been submitted.

Overall, we are satisfied that should the pipeline development proceed as set out by the applicant that there will be limited impacts to the existing mitigation land within Cell 3. There is some concern regarding the impacts on the adjacent SSSI pools (which provide supporting habitat for SPA birds) due to the proximity of the pipeline, however we consider that these can be overcome by mitigation measures that can be detailed within a Construction Environmental Management Plan and secured by the planning permission.

With the addition of appropriate mitigation measures and the timing of the development as proposed by the applicant being secured, we consider that your authority will be able to ascertain that the proposal will not result in adverse effects on the integrity of any of the designated sites in question.

Natural England will provide further detailed advice on all of the required mitigation measures to be secured once an updated HRA has been submitted by the applicant.

Changes to the proposed development

The advice given above only relates to where the pipeline development proceeds as described by the applicant within the HRA and application documents. Where there is any delay to the commencement of the development and works cannot proceed ahead of the Frodsham Solar Farm then we consider that this would represent a significant change to the proposals and resulting impacts of the development.

In this instance we consider a further planning application would be required to set out the changes to the development and ensure a full assessment of the impacts of the overlap with the Frodsham Solar Farm can be carried out. We consider that it is only at a future point in time when the full details of the Frodsham Solar Farm mitigation area are available, that a robust assessment can be carried out with the required certainty for any conclusions.

Please note that our advice with regards to the current HRA conclusions would be subject to change where the pipeline development is not completed ahead of the Frodsham Solar Farm mitigation area. As suggested above further detailed assessment will be required, and the current mitigation measures may no longer be sufficient to reach a conclusion of no adverse effects on site integrity due to the significant changes in the environment in which the development would then be constructed.

We continue to encourage close working between both developers as their proposals progress to ensure that the developments can proceed without any additional impacts on functionally linked habitats for SPA birds.

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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