Planning Inspectorate
Arolygiaeth Gynllunio

SCOPING OPINION:

Proposed Salinae Hydrogen Storage Project

Case Reference: EN0310002

Adopted by the Planning Inspectorate (on behalf of the Secretary of State) pursuant to Regulation 10 of The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017

21 April 2026

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1. INTRODUCTION

1.0.1 On 11 March 2026, the Planning Inspectorate (the Inspectorate) received an application for a Scoping Opinion from Uniper UK Ltd (the applicant) under regulation 10 of The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (The EIA Regulations) for the proposed Salinae Hydrogen Storage Project (the proposed development). The applicant notified the Secretary of State (SoS) under regulation 8(1)(b) of those regulations that they propose to provide an Environmental Statement (ES) in respect of the proposed development and by virtue of regulation 6(2)(a), the proposed development is 'EIA development'.

1.0.2 The applicant provided the necessary information to inform a request under EIA regulation 10(3) in the form of a scoping report, available from:

https://national-infrastructure-consenting.planninginspecto\rate.gov.uk/projects/EN0310002/documents

1.0.3 This document is the Scoping Opinion (the Opinion) adopted by the Inspectorate on behalf of the SoS. This Opinion is made on the basis of the information provided in the Scoping Report, reflecting the proposed development as currently described by the applicant. This Opinion should be read in conjunction with the applicant's Scoping Report.

1.0.4 The Inspectorate has set out in the following sections of this Opinion where it has / has not agreed to scope out certain aspects / matters on the basis of the information provided as part of the Scoping Report. The Inspectorate is content that the receipt of this Opinion should not prevent the applicant from subsequently agreeing with the relevant consultation bodies to scope such aspects / matters out of the ES, where further evidence has been provided to justify this approach. However, in order to demonstrate that the aspects / matters have been appropriately addressed, the ES should explain the reasoning for scoping them out and justify the approach taken.

1.0.5 Before adopting this Opinion, the Inspectorate has consulted the 'consultation bodies' listed in appendix 1 in accordance with EIA regulation 10(6). A list of those consultation bodies who replied within the statutory timeframe (along with copies of their comments) is provided in appendix 2. These comments have been taken into account in the preparation of this Opinion.

1.0.6 The Inspectorate has published a series of advice pages, including 'Advice Note 7: *Environmental Impact Assessment: Preliminary Environmental Information, Screening and Scoping* (AN7)'. AN7 and its annexes provide guidance on EIA processes during the pre-application stages and advice to support applicants in the preparation of their ES.

1.0.7 Applicants should have particular regard to the standing advice in AN7, alongside other advice notes on the Planning Act 2008 (PA2008) process, available from:

'Nationally Significant Infrastructure Projects: Advice pages'

1.0.8 This Opinion should not be construed as implying that the Inspectorate agrees with the information or comments provided by the applicant in their request for an opinion from the Inspectorate. In particular, comments from the Inspectorate in this Opinion are without prejudice to any later decisions taken (e.g. on formal submission of the application) that any development identified by the applicant is necessarily to be treated as part of a Nationally Significant Infrastructure Project (NSIP) or associated development or development that does not require development consent.

2. OVERARCHING COMMENTS

2.1 Description of the Proposed Development

ID	Ref	Description	Inspectorate's comments
2.1.1	Table 2-1	Cavern parameters	The Scoping Report details the anticipated total storage capacity of the caverns. The ES should detail the anticipated depths and lateral extents of the caverns to be constructed.
2.1.2	Appendix A, figure 2-1: Indicative layout of the proposed development	Layout	Appendix A, figure 2-1 is titled "Indicative layout of the proposed development". It identifies the site boundary, which is of greater extent than the proposed cavern plot boundaries and the process areas. Not all project elements described in the Scoping Report have been depicted on the figure, for example water, brine or hydrogen pipelines; electricity connections; pigging facilities; or temporary work areas. In the absence of indicative locations, it is difficult to visualise the proposed development in its entirety. Figures within the ES should clearly identify all project elements or land uses that would take place across the draft Order limits to inform understanding of the proposed development. A clear description of all construction and operational activities should be detailed within the project description chapter.
2.1.3	Section 2.2	Existing land uses and planning permissions	Section 2.2 of the Scoping Report details the existing land uses within the proposed Order Limits. Appendix A, figure 2-1 provides indicative locations of these land uses, however does not delineate their full extent. It is unclear from figure 2-1 where the partially developed infrastructure associated with 7/2007/CCC/13 is located. Figures within the ES should clearly identify the extent of existing land uses and planning permissions. The ES should confirm whether any demolition of infrastructure associated with 7/2007/CCC/13 is required as part of the proposed development.
2.1.4	Section 2.5	Apparatus required at the caverns	The scale of apparatus required during the drilling and leaching phases is unclear. It is important that the ES clearly identifies the type and scale of equipment required to enable a robust assessment of effects.

ID	Ref	Description	Inspectorate's comments
			In addition, paragraph 2.5.19 states that once debrined, the debrining string and wellhead would be removed. The ES should provide details of the apparatus to remain at each cavern surface tie-in point to enable the import, export or transfer of hydrogen during the operational phase.
2.1.5	Para 2.5.15	Nitrogen	Paragraph 2.5.15 states that nitrogen would be used as a blanket medium. The ES should confirm the quantities of nitrogen required, how it would be brought to site and what would happen to the nitrogen upon completion of leaching. Any requisite transport movements should be included within the traffic forecasts.
2.1.6	Sections 2.5 and 2.6	Discharges	The ES should identify the quantities and types of discharges for both the construction and operational phases and confirm how they would be disposed of.
2.1.7	Sections 2.5 and 2.6	Surface water drainage	The proposed surface water drainage should be detailed within the ES.
2.1.8	Sections 2.5 and 2.6	Consumptive water demands	The ES should provide indicative forecasts of all consumptive water demands during the construction phase, including (but not limited to) potable supply for welfare stations, dust suppression, wheel wash, concrete batching, drilling fluids, solution mining, hydrogen production and rewatering requirements for decommissioning. The ES should confirm the sources of all water requirements. Any necessary vehicular movements for tankering water should be identified in the Transport Assessment supporting the ES.
2.1.9	Para 2.6.15	Flare	The ES should include details on the operation of the flare, including its visibility and frequency of use.
2.1.10	Para 3.4.4	Low carbon hydrogen production plant (LCHPP)	Paragraph 3.4.4 confirms that two electrolyser technology options under consideration are proton-exchange membrane and pressurised alkaline water electrolysis. The alternatives section of the ES should explain the differences between the technologies and provide an indication for the chosen option with reference to factors such as the size of the apparatus

ID	Ref	Description	Inspectorate's comments
			and emissions. Should both options remain at the point of DCO application, the ES should reflect the worst-case scenario in the relevant aspect chapters.
2.1.11	Table 20-1	Road improvements	Table 20-1 notes the potential for changes to road junctions, to accommodate construction and operational traffic. All road improvements should be described within the project description chapter of the ES.

2.2 EIA Methodology and Scope of Assessment

ID	Ref	Description	Inspectorate's comments
2.2.1	Para 1.4.4	Transport chapter	The Scoping Report confirms that a Transport Assessment will be submitted as part of the application (not as part of the ES) and will identify and quantify forecast traffic flows. It states that the assessment of environmental effects arising from traffic changes (such as changes in noise levels, air quality concentrations, severance, pedestrian amenity, dust generation, and human health) will be addressed within the respective technical chapters of the ES. The Inspectorate is content that a separate ES chapter identifying and quantifying forecast traffic flows is not required. The Transport Assessment should identify anticipated access routes as well as the need for any abnormal loads which could have implications for the assessment of effects. Cheshire East Council confirmed in its consultation response that it has not had sufficient time to fully assess the proposed scope for traffic and transport and has recommended further detailed discussions on the assessment scope and mitigation (see appendix 2 of this Opinion). The Inspectorate advocates this approach.
2.2.2	Section 2.5	Phasing of cavern development	The Inspectorate understands that at present, the order in which caverns would be drilled is not determined. It is not clear whether the sequencing of the drilling could have implications on the level of impact. Commentary should be provided in the analysis of alternatives in this regard. If there are potentially significant differences, then the worst-case scenario should be considered.
2.2.3	Paras 2.7.4 and 22.2.3	East cavern plots	The Scoping Report states that drilling of four caverns on the east cavern plot commenced in 2025 under British Salt's existing permissions. It confirms that these activities will be considered in the cumulative assessment. Paragraph 2.5.10 states that drilling of wells is estimated to take approximately 3 months per well. As these activities have already commenced, the Inspectorate considers that they form part of the baseline conditions and should be reflected as such in the assessments.

ID	Ref	Description	Inspectorate's comments
2.2.4	Section 2.7	Temporal scope	The proposed development has various overlapping construction and operational phases as well as several elements of uncertainty which require temporal flexibility. For example, the drilling and first fill of caverns and the dates for construction of phases two and three of the gas processing plant which would be determined by demand for hydrogen storage. The ES should identify reasonably foreseeable temporal scenarios whereby all project elements are constructed, reflecting the maximum parameters to be permissible by the DCO. This should reflect the construction and operational phases of the proposed development and be consistent across all aspect chapters. The applicant is referred to the annex of NSIP advice note seven for additional guidance on defining temporal scope in an ES. The ES should confirm the assumptions made for the operational phase assessment, noting the long construction phase (up to 35 years) and overlapping construction and operational activities. The assumptions made in determining the future baseline and opening year should be described in the ES.
2.2.5	Section 2.8	Decommissioning	Paragraph 2.8.4 assumes that decommissioning effects are likely to be similar to and no worse than construction effects and that the two phases have been scoped concurrently. The Inspectorate is generally content with this approach with one exception. There are no details of the decommissioning activity of rewatering the caverns, which is mentioned in paragraph 2.8.6. It is therefore not possible to determine whether the effects of this activity would be "similar to and no worse than construction effects". The ES should provide details for this activity so far as they are known at this stage, such as the equipment required, the source(s) and quantity of the water required and the duration of the activities. Rewatering should be assessed so far as is possible, with all assumptions clearly identified, or an explanation provided as to why it would not result in any additional likely significant effects on the environment that have not been addressed through the construction phase assessment.

ID	Ref	Description	Inspectorate's comments
			An outline of the Decommissioning Environmental Management Plan referred to at paragraph 2.8.7 should be provided with the application and should provide details of the activity.
2.2.6	Table 6-1	Mitigation hierarchy	Table 12-1 notes that the proposed underground pipeline to Hilltop Farm "may pierce any potential lining present within the landfill in the centre and east of the Site". The ES should demonstrate how consideration has been given to the mitigation hierarchy in the routing of the pipelines and explain why the landfill cannot be avoided.
2.2.7	Table 6-1	Lighting	Lighting has been identified as relevant to biodiversity for construction phase (table 6-1) and for biodiversity and human health for the operational phase (table 6-2). The Inspectorate considers lighting should be assessed within both these aspects for all phases, and notes that it would also be of relevance to the landscape and visual aspect.
2.2.8	Tables 6-1 and 6-2	Impact duration	Tables 6-1 and 6-2 identify both construction and operational phase impacts as being temporary (under the heading of 'permanence'). All temporary impacts are considered reversible, and all permanent impacts are considered irreversible; these two definitions can therefore be considered to have the same meaning. It is important to make the distinction between the permanence (or reversibility) of an impact and the duration of impact. Whilst it some impacts may be reversable following decommissioning of the proposed development, the use of 'temporary' could be misleading given the construction phase could last a total of 35 years and operation up to 40 years. The ES should provide specificity in defining the duration of potential impacts.
2.2.9	n/a	Sandbach Flashes Site of Special Scientific Interest (SSSI)	The Scoping Report has considered the potential for some impacts to the Sandbach Flashes SSSI. However, Natural England has identified the need for further consideration of impacts to the site (see appendix 2 of this Opinion). The ES should confirm whether there is any land functionally linked to the SSSI within the zone of influence of the proposed development. This should include land used by bird interest features of the SSSI, and any habitats linked through hydrology or geology. Any likely significant effects should be assessed accordingly within relevant chapters of the ES.

ID	Ref	Description	Inspectorate's comments
2.2.10	n/a	Structure of the Scoping Report	The Scoping Report reports the baseline conditions for all aspects in section 5, identifies potential impacts in section 6, then is followed by sections 9 to 21 which detail the potential environmental effects for each aspect. The methodology for assessment for each aspect is then detailed in appendix C. This has resulted in the need for extensive cross referring throughout the Scoping Report to understand each aspect. The Inspectorate advises that the ES is presented on an aspect basis to enable a thorough understanding of the potential effects on each aspect (notwithstanding the need for an overarching description of the site and assessment methodology).
2.2.11		Transboundary	The Inspectorate on behalf of the SoS has considered the proposed development and concludes that the proposed development is unlikely to have a significant effect either alone or cumulatively on the environment in a European Economic Area State. In reaching this conclusion the Inspectorate has identified and considered the proposed development's likely impacts including consideration of potential pathways and the extent, magnitude, probability, duration, frequency and reversibility of the impacts. The Inspectorate considers that the likelihood of transboundary effects resulting from the proposed development is so low that it does not warrant the issue of a detailed transboundary screening. However, this position will remain under review and will have regard to any new or materially different information coming to light which may alter that decision. Note: The SoS' duty under regulation 32 of the 2017 EIA Regulations continues throughout the application process. The Inspectorate's screening of transboundary issues is based on the relevant considerations specified in the annex to its Advice Page 'Nationally Significant Infrastructure Projects: Advice on Transboundary Impacts and Process'.

3. ENVIRONMENTAL ASPECT COMMENTS

3.1 Biodiversity

(Scoping Report chapter 9)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.1.1	Table 9-1	Dust impacts on Sandbach Flashes SSSI - construction	On the basis that the Sandbach Flashes SSSI is located 645m east of the proposed development, the Inspectorate agrees that significant effects from construction dust are unlikely and that this matter can be scoped out of the ES.
3.1.2	Table 9-2	Traffic impacts on Sandbach Flashes SSSI - operation	The Inspectorate assumes that reference to Sandbach Flats SSSI in tables 9-1 and table 9-2 are typographical errors and should refer to Sandbach Flashes SSSI. The Inspectorate agrees that air quality impacts to Sandbach Flashes SSSI from operational traffic can be screened out subject to confirmation within the ES that operational traffic flows would not exceed the Institute of Air Quality Management (IAQM) traffic screening criteria.
3.1.3	Table 9-2	Impacts from pollution incidents on local wildlife sites, priority habitats (deciduous woodland and traditional orchard) and hedgerows - operation	The Inspectorate is content that significant effects are not likely, subject to the adherence to pollution prevention guidance during the operational phase. This matter can be scoped out of the ES.

ID	Ref	Description	Inspectorate's comments
3.1.4	Section 5.2	Baseline conditions	Appendix C table 9-1 identifies a 30km search area for Special Areas of Conservation where bats are noted as a qualifying feature. Section 5.2 of the Scoping Report does not confirm whether any such SACs are present. Similarly, C table 9-1 identifies a 2km desk study area for irreplaceable habitats, however section 5.2 of the Scoping Report only refers to a 500m distance. The baseline conditions should be presented in the ES for the study areas defined and an impact assessment presented where significant effects are likely.
3.1.5	Tables 6-1 and 9-1	Construction dust and construction traffic	Table 6-1 identifies construction dust and construction traffic as relevant to biodiversity. These matters are scoped out in table 9-1 for Sandbach Flashes SSSI (as noted in ID 3.1.1 above), however there is no other reference within table 9-10 to construction dust or traffic impacts on other ecological receptors. Consideration should be given to the potential for effects on sensitive habitats or aquatic species and an assessment of effects provided, where significant effects are likely. The applicant's attention is drawn to guidance within the IAQM's "Guidance on the assessment of dust from demolition and construction" in respect of dust.
3.1.6	Table 9-1	Surveys	Table 9-1 proposes surveys for badgers, bats, otters, water vole, reptiles, breeding and wintering birds, amphibians, white clawed crayfish, aquatic species and habitats (including priority habitats). Proposed survey methodology has not been provided. The applicant should seek to agree survey scope with relevant consultation bodies.
3.1.7	Appendix C table 9-1	Footnote 6	Footnote 6 refers to "Appendix 8.3 (TR010034/APP/6.5)". The Inspectorate assumes this to be a reference to an application document for a different project. The applicant should ensure that footnotes reference application documents for the proposed development itself.
3.1.8	n/a	Invasive species	The ES should confirm the presence or absence of invasive species. If present, the ES should assess any likely significant effects resulting from the proposed development and detail any relevant biosecurity measures that would be implemented.

ID	Ref	Description	Inspectorate's comments
3.1.9	n/a	Sensitive environmental information	Under Regulation 12(5)(g) of the Environmental Information Regulations 2004 (EIR), public bodies have a responsibility to avoid releasing sensitive environmental information that could bring about harm to sensitive or vulnerable ecological features. Sections of the ES containing specific survey and assessment data relating to the location of sensitive species (e.g., badgers, rare birds, and plants) or other vulnerable environmental features should be provided in separate annexes by the applicant. This approach reduces the sensitive ecological feature's risk of disturbance, damage, persecution, or commercial exploitation arising from publication. The applicant's approach should be proportionate and only use these separate annexes for species where there is a genuine risk of harm. All other assessment information should be included in an ES chapter, as normal, with a placeholder providing a justification as to why annexes have been withheld and that a full version of the ES has been submitted to the Inspectorate.

3.2 Landscape and visual amenity

(Scoping Report chapter 10)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.2.1	Tables 10-1 and 10-2	Impacts from a change in land use on national landscape character – construction and operation	Impacts to the Shropshire, Cheshire and Staffordshire Plain National Character Area (NCA) are proposed to be scoped out on the basis that, in the wider context of the NCA, the proposed development would only account for a small area, and as such, significant effects would be unlikely to occur. The Inspectorate notes that tables 10-1 and 10-2 assign a receptor sensitivity of medium to the NCA. This is at odds with the methodology proposed in appendix C, table 10-1 which implies a sensitivity of high for national landscapes. Considering the significance of effects matrix (appendix C, table 10-3), a minor magnitude of impact and high sensitivity could result in a moderate effect. Taking this into account, and as a 50m chimney stack is proposed, the Inspectorate does not agree that this matter can be scoped out from the assessment. Impacts on the Shropshire, Cheshire and Staffordshire Plain NCA should be assessed in the ES, unless evidence is provided within the ES that relevant consultation bodies have confirmed an assessment is not required.

ID	Ref	Description	Inspectorate's comments
3.2.2	Para 5.3.1	Study area	The Scoping Report proposes a study area of 1km from the order limits on the basis that the topography surrounding the site is predominantly flat and so significant effects are unlikely to occur beyond this. The Inspectorate considers that insufficient evidence has been provided to justify this statement, particularly as flat topography can allow views to extend further than in more varied terrain. The study area should be informed by Zone of Theoretical Visibility (ZTV) mapping (to include the chimney stacks and flaring operations)

ID	Ref	Description	Inspectorate's comments
			and the applicant should seek agreement with the relevant consultation bodies on its extent.
3.2.3	Section 5.3	Visual receptors and viewpoints	Appendix A, figure 5-2 identifies key visual receptors. The Inspectorate notes that photographic viewpoint locations will be defined at a later date. The applicant should seek to agree these with relevant consultation bodies, including the local planning authorities.
3.2.4	n/a	Lighting	Neither construction nor operational lighting are identified as relevant to landscape and visual amenity in tables 6-1 or 6-2. The Inspectorate expects the potential impacts of lighting to be considered within the assessment, particularly noting that the drilling rig would operate continuously 24 hours a day, 7 days a week.

3.3 Historic environment and archaeology

(Scoping Report chapter 11)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.3.1	Table 11-2	Impacts to non-designated heritage assets/unknown archaeological deposits resulting from a change in land use - operation	This matter is proposed to be scoped out on the basis that construction phase excavations would remove any buried archaeological remains on site and so the operational phase would not have any additional effect on buried archaeology. As this matter is scoped in for construction, the Inspectorate agrees that that it can be scoped out for the operational phase.

ID	Ref	Description	Inspectorate's comments
3.3.2	Table 11-1	Conservation area	Paragraph 2.2.10 states that the main access into the site is via an unmade track off the British Salt/Kistos private access road leading from the village of Warmingham. The ES should assess the potential impacts of construction traffic on the Warmingham Conservation Area, where significant effects are likely.
3.3.3	Appendix C, Paragraph 11.2.3	Receptor value	The methodology for assigning value to assets is derived from the Design Manual for Roads and Bridges (DMRB). According to this guidance, high value assets are 'High importance and rarity, national scale, and limited potential for substitution'. Appendix C, table 11-1 of the Scoping Report considers Grade II listed buildings and Registered Parks and Gardens as 'medium value'. These receptors are nationally significant and should therefore be considered 'high value'. The applicant's attention is drawn to the consultation response from Historic England (appendix 2 of this Opinion) for further information.

ID	Ref	Description	Inspectorate's comments
3.3.4	Appendix C, Paragraph 11.3.2	Archaeological investigations	The Scoping Report states that archaeological investigations may be required to inform the EIA, depending on the findings of the desk-based assessment. The applicant should discuss the need for further archaeological investigations with relevant consultation bodies.

3.4 Water environment and flood risk

(Scoping Report chapter 12)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.4.1	Tables 12-1 and 12-2 and para 2.6.17	Impacts to the River Wheelock from water abstraction for solution mining – construction and operation	The Environment Agency has agreed there is significant headroom in the existing abstraction licence (which is for the purpose of solution mining) and as such no licence changes would be required for this activity (see appendix 2 of this Opinion). The Inspectorate agrees that this matter can be scoped out, subject to confirmation within the ES of the proposed development's construction, operational and decommissioning phase water requirements and that they could be accommodated by headroom in British Salt's existing abstraction licence. The ES should clarify the abstraction rates and overall volumes required for all phases (see also ID 2.2.5 above regarding decommissioning), and how this may change over time affecting the increased use of the existing licence. The applicant should also provide evidence of agreement with British Salt on the use of their existing abstraction licence. If this information cannot be provided, the Inspectorate expects an assessment of effects on water resources, or further justification as to why significant effects are not likely.
3.4.2	Table 12-1	Impacts to standing water bodies from pollution incidents – construction	The Inspectorate acknowledges that the implementation of standard working practices and adherence to pollution prevention measures would provide some mitigation of potentially significant effects. However, the loss of drilling fluids from drilling of the subsurface and from trenchless installation of the underground pipeline from the west plot caverns to the east plot gas processing facility has not been considered. Table 13-1 of the Scoping Report confirms this matter will be assessed for Geology and Soils. The Inspectorate considers this matter should also be assessed for surface water bodies and therefore this matter cannot be scoped out of the ES at this stage. The ES should assess the impact on Hoggins Brook and other surface water bodies from the loss of drilling fluids, or provide further evidence that significant effects are not likely.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.4.3	Table 12-2	Impacts to standing water bodies from pollution incidents - operation	The Scoping Report acknowledges pollution events may occur during operation, but scopes out the matter on the basis that water quality would be regularly checked, and emergency plans would be in place to manage any leaks. The Inspectorate notes the advice of the Environment Agency (see appendix 2 of this Opinion) and does not agree this matter can be scoped out at this stage. The ES should confirm whether there is any connectivity with the caverns and the water environment (both surface waters and groundwaters). It should provide an assessment of risks associated with brine leaks or chemicals used for cavern maintenance, or further evidence that significant effects are not likely.

ID	Ref	Description	Inspectorate's comments
3.4.4	Tables 12-1 and 12-2	Fluvial flood risk	For the avoidance of doubt, the assessment of flood risk should address the potential impacts of flooding on the proposed development and the potential for the proposed development to exacerbate flood risk elsewhere. Flood risk should be assessed over the lifetime of the proposed development, accounting for climate change, as advised by the Environment Agency. See appendix 2 of this Opinion for further information on this matter.
3.4.5	Appendix C, section 12.1	Baseline conditions	The baseline conditions would be established through a desk-based study, a site visit and relevant consultation bodies. The Environment Agency has advised that the sensitivity of a watercourse cannot be determined from a desk study alone (see appendix 2 of this Opinion). The applicant should ensure that the baseline is sufficiently defined and seek to agree the methodology for defining it with the relevant consultation bodies.
3.4.6	Appendix A, figure 5.5	Figures	Appendix A, figure 5.5 identifies the location of the River Wheelock Water Framework Directive (WFD) surface watercourse and main river. Further surface water features are described in section 5.5 of the Scoping Report. Their locations should be depicted on figures within the ES to facilitate understanding of the baseline environment.

ID	Ref	Description	Inspectorate's comments
3.4.7	Appendix A, figure 5-5	Flood defences	Appendix A, figure 5-5 identifies a flood defence in the eastern part of the site. At present, it is unclear what activities would take place in this part of the site. The ES should confirm whether the proposed development would impact on the structure and function of the flood defence structures and assess any implications on the flood risk at the site.
3.4.8	n/a	River Wheelock	It is unclear whether any works would be required within, under or over the River Wheelock, which appendix A, figure 5-1 shows as hugging the eastern boundary of the proposed development. The ES should confirm whether the River Wheelock would be temporarily or permanently crossed during construction or operation or whether any discharges to it are proposed, with any likely significant effects assessed accordingly. The applicant's attention is drawn to the consultation response from the Environment Agency (appendix 2 of this Opinion) in this regard.
3.4.9	n/a	Landfill leachate - operation	Landfill leachate release during the operational phase is not mentioned in table 12-2, but is included in table 13-2 for Geology and Soils. The ES should assess potential impacts of landfill leachate to the River Wheelock and ordinary watercourses during the operational phase of the proposed development, where significant effects are likely.
3.4.10	n/a	Foul water	The management of foul water generated by welfare facilities is unclear. Should treatment and discharge be required on site, or transport be required to an offsite disposal facility, the ES should assess any resultant likely significant effects. The applicant's attention is drawn to the consultation response from the Environment Agency (appendix 2 of this Opinion) for further information.
3.4.11	n/a	Mobilisation of contaminants	Mobilisation of contaminants is not identified as a potential impact for surface water bodies. The ES should assess any likely significant effects on water surface bodies (in addition to the groundwater bodies which are proposed to be assessed). See the Environment Agency's consultation response for further information (appendix 2 of this Opinion) and ID 3.5.3 of this Opinion.

ID	Ref	Description	Inspectorate's comments
3.4.12	n/a	Thermal emissions	The applicant's attention is drawn the comments of the Environment Agency (appendix 2 of this Opinion) regarding the impacts of thermal emissions from buried pipelines to groundwater, surface water and groundwater dependent terrestrial ecosystems during the operational phase. The ES should provide and assessment of effects, or evidence to support that a significant effect is not likely.

3.5 Geology and soils

(Scoping Report chapter 13)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.5.1	Table 13-1	Impacts of temporary change in land use from construction work areas on agricultural and potential BMV land	The Scoping Report confirms that construction activities would be managed in accordance with a Soil Management Plan (SMP) to minimise soil degradation and support restoration. No permanent change in land use is anticipated for the construction work areas. The Inspectorate considers these to be reasonable mitigation measures in this case and on that basis, further assessment of effects can be scoped out of the ES. An outline SMP should be provided with the application outlining the measures to be implemented to allow consideration of the adequacy of proposed management measures. The Inspectorate considers that the temporary loss of land for agricultural use to be a planning matter, not an EIA matter. On this basis, an assessment of effects from the temporary change in land use can be scoped out of the ES. However, this matter may be of interest during an examination.
3.5.2	Table 13-1	Impacts on soil resources and soil function from site clearance, excavation, earthworks and installation of hardstanding areas	The Scoping Report proposes a SMP to be prepared in accordance with the Defra (2009) Construction Code of Practice for the Sustainable Use of Soils on Construction Sites and the Institute of Quarrying (2021) Good Practice Guide for Handling Soils in Mineral Workings. The Inspectorate agrees that significant effects on soil resource and function are unlikely subject to construction practices being in accordance with the SMP. This matter can be scoped out of the ES. An outline SMP should be provided with the application outlining the measures to be implemented.
3.5.3	Table 13-2	Impacts of mobilisation of contaminants on groundwater bodies, watercourses, existing	The Scoping Report concludes that any residual contamination risk would be addressed through pre-construction ground investigations and remediation measures. The Inspectorate has considered the advice of the Environment Agency (see appendix 2 of this Opinion) which has highlighted two major north-south trending faults within the site

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
		site users and future site users - operation	and study area and the potential for preferential migration along existing fractures. The Inspectorate does not agree this matter can be scoped out. The ES should identify risks of pollution to sensitive groundwater receptors from the operational phase activities provide an assessment of impacts to sensitive groundwater receptors, where significant effects are likely. The Inspectorate recommends the applicant discusses the scope of this assessment with the Environment Agency.

ID	Ref	Description	Inspectorate's comments
3.5.4	Section 5.6	Study area	A 250m study area buffer has been applied to consider the effects associated with land contamination. The Environment Agency has raised concerns that this may not capture potential impacts on sensitive groundwater receptors beyond the buffer (see appendix 2 of this Opinion). The applicant should seek to agree an extended hydrogeological study area with the Environment Agency.
3.5.5	Section 5.6	Groundwater receptors	The Environment Agency has highlighted the presence of the Weaver and Dane Quaternary Sand and Gravel Aquifers WFD Groundwater body which underlies the site and the Ridding Farm Ponds Local Nature Reserve located in the southern part of the site (see appendix 2 of this Opinion). Construction and operational impacts on these receptors should be assessed, where significant effects are likely. Consideration should also be given to impacts on public and private water supply groundwater abstractions.
3.5.6	Section 5.6	Geological hazards	Geological hazards are identified within the site in the baseline conditions section of the Scoping Report. Paragraph 21.2.3 (of the Major Accidents and Disasters chapter) states that "risks associated with geohazards (for example ground instability, unexploded ordnance, landfill gas permeability) are addressed in Geology and Soils". However, ground instability and unexploded ordnance are not considered in tables 13-1 or 13-2. The ES should assess any likely significant effects result from ground instability and subsidence, particularly in areas where underground mining has taken place.

ID	Ref	Description	Inspectorate's comments
			The applicant's attention is drawn to the comments of Natural England in appendix 2 of this Opinion regarding the need for further investigation of the stability of the area to inform any potential impacts of the proposed development to the geological interest of the Sandbach Flashes SSSI. It is unclear whether references to unexploded ordnance are an error a there is no further information in the Scoping Report to indicate its presence. The ES should assess any likely significant effects that could result from the removal of unexploded ordnance.
3.5.7	Section 5.6	Agricultural land classification (ALC) surveys	The Scoping Report confirms that further assessment work is required to derive a definitive ALC grading for the land. The applicant should give due consideration to the Agricultural Land Classification of England and Wales: Guidelines for grading the quality of agricultural land, published by the Welsh Government and Defra in December 2025. It should also note that the Predictive ALC Map for England was revised in March 2026. An ALC and soil survey of the land should normally be at a detailed level, with one auger boring per hectare for example, supported by pits dug in each main soil type to confirm the physical characteristics of the full depth of the soil resource. The ES should contain a clear tabulation of the areas of land in each Best Most Versatile (BMV) classification to be temporarily or permanently lost as a result of the proposed development, with reference to accompanying map(s) depicting the grades. Specific justification for the use of the land by grade should be provided. Consideration should be given to the use of BMV land in the applicant's discussion of alternatives.
3.5.8	Table 13-1	Hydrogeological impact assessment	The Scoping Report notes that the Environment Agency has requested a hydrogeological impact assessment. The assessment methodology presented in appendix C, section 13 refers solely to effects associated with land contamination and soils and agriculture, it does not confirm how hydrogeological impacts would be assessed. The applicant should seek to agree the methodology with the Environment Agency and clearly outline its approach in the ES.

ID	Ref	Description	Inspectorate's comments
3.5.9	Appendix C, table 13-2	Magnitude of impact and typical descriptions	It should be made clear what is meant by statements such as "contamination levels significantly exceed background levels and relevant screening criteria". The ES should define what the "relevant screening criteria" are and what would constitute a significant exceedance.

3.6 Noise and vibration

(Scoping Report chapter 14)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.6.1	Table 14-2	Impacts from vibration on residents of properties in close proximity to the site - operation	This matter is proposed to be scoped out on the basis that operational plant is expected to produce minimal vibration. Considering the separation between the operational plant and the nearest residential receptors, the Inspectorate agrees that significant effects from operational vibration are not likely to occur. This matter can be scoped out from the ES.
3.6.2	Table 14-2	Impacts from road traffic noise on residents of properties in close proximity to the site - operation	The scoping report proposes to scope this matter out on the basis that the small number of operational staff required on site would mean that vehicle movements on the local road network would be unlikely to reach the thresholds for an increase in road traffic noise. The Inspectorate agrees that significant effects from operational traffic on nearby residential properties are unlikely to occur and this matter can be scoped out of the ES.
3.6.3	Table 14-2	Impacts from maintenance noise on residents of properties in close proximity to the site - operation	The Scoping Report states that maintenance activities would be routinely scheduled to avoid flaring during sensitive periods such as nights, evenings and weekends. It notes that operational flaring maintenance is not predicted to meet temporal threshold for significant impacts (of 10 days or more in 15 consecutive days, or a total number of days exceeding 40 in any 6 consecutive months). Subject to commitments to such scheduling of maintenance being secured in a relevant control document, the Inspectorate agrees that significant effects from maintenance noise on nearby residential properties are unlikely to occur. This matter can be scoped out of the ES.

ID	Ref	Description	Inspectorate's comments
3.6.4	Appendix C, para 14.4.9	Baseline noise levels	Appendix C, paragraph 14.4.9 refers to a baseline noise survey data, no details of which have been provided. The applicant should seek to agree the methodology for baseline noise level surveys with relevant consultation bodies.
3.6.5	n/a	Cheshire East Council	Cheshire East Council confirmed in its consultation response that it has not had sufficient time to fully assess the proposed scope for the noise and vibration assessment and has recommended further detailed discussions on the assessment scope and mitigation (see appendix 2 of this Opinion). The Inspectorate advocates this approach.

3.7 Air quality

(Scoping Report chapter 15)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.7.1	Table 15-1	Dust impacts on Sandbach SSSI - construction	As noted at ID 3.1.1 of this Opinion, the Inspectorate agrees that significant effects from construction dust are unlikely as Sandbach Flashes SSSI is located 645m east of the proposed development. This matter can be scoped out of the ES.
3.7.2	Table 15-1	Impacts from plant emissions on Sandbach Flashes SSSI - construction	The Scoping Reports notes that, according to IAQM guidance: non-road mobile machinery (NRMM) emissions would be unlikely to make a significant impact on local air quality contractors would be required to meet the limits on NRMM set out within the regulations; measures set out in the CEMP would minimise emissions from plant; and that drilling activities are short-term and would be located a sufficient distance away from sensitive receptors to avoid significant impacts. Considering the separation between the plant and these receptors and the implementation of the CEMP, the Inspectorate agrees that significant effects are unlikely to occur. This matter can be scoped out from the ES. An outline CEMP should be provided with the application outlining the measures to be implemented.
3.7.3	Table 15-1	Impacts from plant emissions on high sensitivity human health receptors within 1km of the site – construction	
3.7.4	Table 15-2	Impacts from traffic on Sandbach Flashes SSSI - operation	As noted at ID 3.1.2**Error! Reference source not found.** of this Opinion, the I nspectorate agrees that that impacts on Sandbach Flashes SSSI from operational traffic can be screened out subject to confirmation within the ES that operational traffic flows would not exceed the IAQM traffic screening criteria for further assessment.
3.7.5	Table 15-2	Impacts from operational traffic on high sensitivity human health receptors	The Inspectorate agrees that impacts on high sensitivity human health receptors from operational traffic can be screened out subject to confirmation within the ES that the traffic flows would not exceed the IAQM traffic screening criteria.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.7.6	Table 15-2	Impacts from vented hydrogen and oxygen emissions on Sandbach Flashes SSSI - operation	The Scoping Report states that the operation of the LCHPP would lead to vented emissions of hydrogen and oxygen as part of the electrolysis process, but neither of these gases would cause adverse impacts to sensitive habitats. The Inspectorate agrees that this matter can be scoped out of the ES.
3.7.7	Table 15-2	Impacts from vented hydrogen and oxygen emissions on high sensitivity human health receptors within 1km of the site - operation	This matter is proposed to be scoped out on the basis that neither oxygen nor hydrogen are regulated local air quality pollutants and would not cause adverse impacts to humans at ambient levels. The Inspectorate agrees that this matter can be scoped out of the ES.
3.7.8	Table 15-2	Impacts from odour emissions discharged by the hydrogen gas regeneration system and from the release of hydrogen sulphide (H_2S) from the cavern on High sensitivity human health receptors within 1km of the site - operation	The Scoping Report states that odour impacts to surrounding communities would be managed using established techniques to control fugitive emissions to air, supported by an effective leak detection and repair programme. These measures would be implemented through an odour management plan. The Inspectorate agrees that odour emissions released by the proposed development are unlikely to result in significant effects and that this matter can be scoped out of the ES. An outline odour management plan should be provided with the application outlining the measures to be implemented.

ID	Ref	Description	Inspectorate's comments
3.7.9	Table 6-1	Potential construction phase impacts	"Site clearance, excavation, earthworks, and installation of hardstanding areas" has not been identified as relevant for the air quality topic. The Inspectorate considers that these activities have the potential to generate dust and should be considered accordingly, where significant effects are likely.

ID	Ref	Description	Inspectorate's comments
3.7.10	Section 5.8	Air quality baseline	Section 5.8 confirms that there is no local authority air quality monitoring within 1km of the site and refers to the Department for the Environment, Food and Rural Affairs (Defra) background air quality maps. The Scoping Report does not confirm whether project-specific air quality surveys would be undertaken. The applicant should ensure that data used is representative of the site and seek to agree the approach to defining the air quality baseline with relevant consultation bodies.
3.7.11	Table 15-2	Stack emissions	The Scoping Report does not propose a methodology for the qualitative assessment of stack emissions from the flare, standby diesel generator and firewater pumps. The applicant should seek to agree its approach with relevant consultation bodies. Sensitivity testing should be undertaken where there is flexibility within the DCO for the height of stacks.
3.7.12	n/a	Guidance	The applicant's attention is drawn to the Defra advice 'PM2.5 Targets: Interim Planning Guidance'. The ES should explain how key sources of air pollution within the proposed development have been identified and how action has been taken to minimise emissions of PM2.5 or its precursors.

3.8 Waste and materials

(Scoping Report chapter 16)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.8.1	Tables 16-1 and 16-2	Sterilisation of mineral safeguarding area (MSA) – construction and operation	The Inspectorate agrees that the proposed development would not result in sterilisation of an unexploited mineral resource and that this matter can be scoped out of the ES.
3.8.2	Table 16-2	Impacts on landfill capacity - operation	The Inspectorate notes that operational waste quantities are unknown at this stage but accepts the applicant's position that they are anticipated to be negligible given the operational nature of the proposed development. The Inspectorate agrees this matter can be scoped out of the ES. However, the management of waste should be clearly identified within the ES and a relevant control document.
3.8.3	Table 16-2	Impacts on raw material use - operation	The Inspectorate notes that operational material usage is unknown at this stage but accepts the applicant's position that they are anticipated to be negligible given the operational nature of the proposed development. The Inspectorate agrees this matter can be scoped out of the ES.

ID	Ref	Description	Inspectorate's comments
3.8.4	n/a	n/a	The Inspectorate has no further comments to make on the proposed assessment.

3.9 Climate vulnerability

(Scoping Report chapter 17)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.9.1	Tables 17-1 and 17-2	Impacts of slow onset changes to the future climate on water resources - construction and operation	The Inspectorate acknowledges that climate change impacts and future water availability are integrated into abstraction licensing decisions. It agrees that this matter can be scoped out of the ES, as detailed in ID 3.4.1 of this Opinion.
3.9.2	Table 17-1	Impacts of extreme weather on construction processes and activities	The Inspectorate is content that the Water Resources and Flood Risk Chapter would assess the impacts of flooding on the viability of the site for construction and on drainage infrastructure, taking into consideration extreme weather. Therefore, it agrees a further separate assessment is not required. The Inspectorate is also content that other climate vulnerability impacts on construction activities and processes could be controlled through the CEMP and therefore significant effects are not likely and do not require assessment within the ES. An outline CEMP should be provided with the application outlining the measures to be implemented.
3.9.3	Table 17-2	Impacts of extreme weather on drainage infrastructure - operation	
3.9.4	Table 17-1	Impacts of extreme weather on environmental receptors - construction	The Scoping Report acknowledges that climate change could "affect, intensify or ameliorate, the potential impacts set out by the other disciplines". The Inspectorate is satisfied that a standalone climate vulnerability chapter is not required on the basis that these matters will be covered by an ICCI (In-combination Climate Change Impacts) assessment within each ES topic "as required". However, it is

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.9.5	Table 17-2	Impacts of slow onset changes to the future climate on environmental receptors - operation	unclear what is meant by "as required" and no details of the approach to the ICCI have been provided. Each technical aspect chapter should confirm whether there is the potential for climate change to "affect, intensify or ameliorate, the potential impacts" assessed and provide an assessment of likely significant effects where appropriate.
3.9.6	Table 17-2	Impacts of slow onset changes to the future climate on structures (above and below ground) - operation	Climate related impacts are proposed to be mitigated by design. The Inspectorate agrees that impacts are unlikely to be significant and that this matter can be scoped out of the ES.
3.9.7	Table 17-2	Impacts of slow onset changes to the future climate materials - operation	
3.9.8	Table 17-2	Impacts of slow onset changes to the future climate on power and tele-communications equipment - operation	

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.9.9	Table 17-2	Impacts of extreme weather on all receptors (environmental and human) - operation	The Scoping Report concludes that climate or extreme weather would not "cause a major accident or disaster or hinder the effective management of a major accident or disaster that was otherwise unrelated to climate thereby increasing its severity". The Inspectorate acknowledges this comment, however considers that impacts of extreme weather during operation should be considered in the ICCI referred to above.

3.10 Effects on climate

(Scoping Report chapter 18)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.10.1	Appendix C, table 18-1	Transport of users and goods to the building - operation	The Inspectorate is content that transport emissions from the user's utilisation stage of the lifecycle are unlikely to result in significant effects and that this matter can be scoped out of the assessment.

ID	Ref	Description	Inspectorate's comments
3.10.2	n/a	Hydrogen emissions	Hydrogen is not a greenhouse gas, but is a gas with global warming potential. The applicant should demonstrate effective management of emissions of hydrogen within the application. The Inspectorate notes that the odour management would address fugitive emissions of hydrogen sulphide and that this would, by default, also limit emissions of hydrogen. The Inspectorate does not consider fugitive emissions of hydrogens requires assessment, however the ES should recognise the dual purpose of the odour management plan to also manage fugitive hydrogen emissions. The applicant should also demonstrate how the vented release of hydrogen emissions from the electrolyser unit of the LCHPP would be minimised.

3.11 Socioeconomics

(Scoping Report chapter 19)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.11.1	n/a	n/a	No matters have been proposed to be scoped out of the assessment.

ID	Ref	Description	Inspectorate's comments
3.11.2	n/a	n/a	The Inspectorate has no further comments to make on the proposed assessment.

3.12 Human health

(Scoping Report chapter 20)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.12.1	Table 20-1	Changes in air quality, affecting people - construction	Table 20-1 proposes to scope out these matters for the following receptors: • wider population: surrounding population and community • sensitive sub-population – age (families with children; and elderly persons) • sensitive sub-population – materially disadvantaged • sensitive sub-population – mentally and/or physically disadvantaged This is on the basis that UK legislation requires developers to meet specific standards that are directly connected to thresholds for impacts on human health. The Scoping Report states that the contribution of any changes to these aspects will be considered in the context of changes in amenity (on an in-combination basis). The Inspectorate notes that these matters will be assessed for Warmingham residents except for "Changes in risks of pollution of soils and water, affecting people – construction". It is unclear why Warmingham residents have not been considered as a receptor for this matter. The Inspectorate assumes this is a drafting error, however for the avoidance of doubt considers this matter should be assessed for this receptor. These matters are also proposed to be assessed in the Noise and vibration chapter for residents of properties in proximity to the site (Table 14-1) and in the Air Quality chapter for high sensitivity human health receptors (Table 15-1).
3.12.2	Table 20-1	Changes in noise and vibration, affecting people - construction	
3.12.3	Table 20-1	Changes in risks of pollution of soils and water, affecting people - construction	

			Subject to the caveat above, the Inspectorate agrees that this matter can be scoped out of the human health aspect of the ES.
3.12.2	Tables 20-1 and 20-2	Changes in employment and income - construction and operation	Changes in employment and income during construction are proposed to be scoped out for the following receptors: • wider population: surrounding population and community • sensitive sub-population – age (families with children; and elderly persons) • sensitive sub-population – mentally and/or physically disadvantaged This is on the basis that they are receptors of low sensitivity, which combined with a moderate impact magnitude would not result in significant effects. The Inspectorate agrees that this matter can be scoped out of the ES.
3.12.1	Table 20-1	Uncertainty and anxiety for construction workers	The Inspectorate agrees that significant effects on construction workers are unlikely and that this matter can be scoped out of the ES.
3.12.2	Table 20-2	Impacts on Wider population: Surrounding population and community from changes in access to community, recreational and educational facilities - operation	The Scoping Report proposes to scope out this impact for receptor with a sensitivity of medium or low. It assigns a sensitivity of low to “Wider population: Surrounding population and community” for the operational phase, but medium for the construction phase. It is unclear why this is the case. Nevertheless, the Inspectorate agrees that impacts would be of minor magnitude and that significant effects are unlikely during operation. This matter can be scoped out of the ES for the surrounding population and community.

3.12.3	Table 20-2	Changes in access to green space and open space - construction	Table 20-2 proposes to scope out operational impacts for the following receptors: • wider population: surrounding population and community • sensitive sub-population – age (families with children; and elderly persons) • sensitive sub-population – materially disadvantaged This is on the basis that they are receptors of low or medium sensitivity, which combined with a minor impact magnitude would not result in significant effects. The Inspectorate agrees this matter can be scoped out of the ES for the above receptors.
3.12.4	Table 20-2	Changes in access to healthcare facilities for all receptors - operation	For the construction phase, tables 6-1 and 20-1 refer to the potential for construction traffic to disrupt access to healthcare facilities and propose to assess this matter. For the operational phase, tables 6-2 and 20-2 do not refer to disruption from traffic but state that the proposed development could create long-term employment opportunities and support local economic resilience. Whilst stable income could improve access to private healthcare, the Inspectorate does not consider this to be a sufficient justification to scope out the matter as access to all healthcare facilities should be considered, including those publicly funded. Nevertheless, the Inspectorate considers that the predicted low operational traffic movements would be unlikely to result in travel disruption to these facilities. In addition, the Inspectorate considers the low number of operational employment opportunities are unlikely to impact on access to healthcare facilities. The Inspectorate therefore agrees this matter can be scoped out of the ES.
3.12.5	Table 20-2	Changes in air quality, affecting people, for all receptors - operation	A negligible magnitude of impact has been predicted assuming effective control measures in line with legislative standards and permitting requirements. The Inspectorate agrees that significant effects are not likely and that this matter can be scoped out of the ES.

3.12.6	Table 20-2	Changes in noise and vibration, affecting people, for all receptors - operation	A minor magnitude of impact has been predicted assuming effective control measures in line with legislative standards and permitting requirements. The Inspectorate agrees that significant effects are not likely and that this matter can be scoped out of the ES.
3.12.7	Table 20-2	Changes in risks of pollution of soils and water, affecting people for all receptors - operation	
3.12.8	Table 20-2	Operational traffic	Table 20-2 proposes to scope out operational impacts for the following receptors: • wider population: surrounding population and community • sensitive sub-population – materially disadvantaged This is on the basis that they are receptors of low sensitivity, which combined with a moderate impact magnitude would not result in significant effects. It is unclear why the sensitivity of these receptors differs to the assessment of construction phase traffic (in table 20-1). Given the predicted moderate magnitude of impact, the sensitivity of receptor will have a bearing on whether there is a likely significant effect or not. Given these discrepancies, the Inspectorate does not agree that these receptors can be scoped out. An assessment of effects should be provided, or further information as to why significant effects are not likely.

ID	Ref	Description	Inspectorate's comments
3.12.9	Table 20-1	Changes in access to community,	Tables 6-2 and 20-2 refer to public rights of way (PRoWs) crossing the site which could be affected by the proposed development during operation. This could result in impacts on access to education, community, events and social interaction. No

		recreational and educational facilities	reference is made to construction phase impacts in table 20-1. The Inspectorate considers that impacts resulting from diversions or closures to PRoWs during the construction phase should also be assessed as these may differ to (and potentially be more extensive than) those in the operational phase.
3.12.10	Table 20-1	Changes in access to healthcare facilities - construction	The number of anticipated construction workers has not been identified within the Scoping Report, therefore it is not possible to ascertain whether they could put pressure on the capacity of healthcare facilities. This should be assessed in the ES, where significant effects are likely.
3.12.11	Tables 20-1 and 20-2	Sensitivity of receptors	Tables 20-1 and 20-2 assign sensitivities to each receptor under consideration. It is unclear why the sensitivity of given receptors changes depending on the project phased being assessed. Some of these inconsistencies are noted in the table above, however further examples include the Warmingham residents receptor which is assigned high sensitivity for construction traffic in table 20-1 and medium sensitivity for operational phase in table 20-2. Similarly, the sensitivity of some receptors changes depending on the impact being assessed. Appendix C, section 20.5 of the Scoping Report confirms that IEMA guidance has been used to assign sensitivity to the receptors. Table 7.1 of IEMA guidance "Determining Significance for Human Health in Environmental Impact Assessment" (2022) does not infer different levels of sensitivity for a single receptor. The sensitivity of a receptor should be defined and consistently applied within the ES, unless justifications for variations are provided.

3.13 Major accidents and disasters

(Scoping Report chapter 21)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.13.1	Table 21-3	Construction phase – all matters	The Inspectorate is content that risks associated with climate vulnerability, flooding, geohazards and transport accidents have been adequately addressed elsewhere in the Scoping Report. It further notes that design measures or legal requirements, codes and standards would adequately control potential construction and operational related health, safety and environmental risks.
3.13.2	Table 21-3	Operational phase – all matters except large scale accidental release of hydrogen gas	

ID	Ref	Description	Inspectorate's comments
3.13.3	Appendix C, section 21.1	Study area	The Scoping Report states that the "study areas that are described in the other environmental topic sections are deemed to be sufficient for use in the consideration of Major Accidents and Disasters". The study area is therefore unclear as it varies for different aspects and should be clarified in the ES. In particular, the ES should define and justify the study area for the assessment of the effects of a large-scale accidental release of hydrogen gas.
3.13.4	Appendix C, section 21.1	Assessment methodology	The proposed assessment methodology involves assessing the severity and likelihood of an event or accident scenario and combining these in a risk matrix to determine the tolerability of the risk. This is acknowledged by the Inspectorate. The

			ES should provide a clear methodology for aligning the risk-based approach with the requirement within the EIA regulations to report on the significance of effect.
3.13.5	Para 21.2.3	Geological hazards	See ID 3.5.6 above.

3.14 Cumulative effects

(Scoping Report chapter 22)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.14.1	Para 22.3.4	Impact interactions between climate vulnerability and effects on climate	The Scoping Report notes that the effects of GHG emissions are cumulative, with their concentration in the atmosphere, rather than actual emissions levels, being what determines the warming effect. It concludes that shortlisted reasonably foreseeable future projects (RFFPs) would not affect the likelihood of climate hazards or their consequences on the proposed development in ways that will not have already been considered within the climate vulnerability assessment of the ES. The Inspectorate agrees this can be scoped out of the ES.

ID	Ref	Description	Inspectorate's comments
3.14.2	Appendix C, section 22.3	Inter-project effects	Appendix C, paragraph 22.3.4 states that the inter-project cumulative effects assessment would make use of two future baselines for the proposed development to be considered against: 1) The opening year future baseline 2) The operational future baseline (opening year + 5 years) This implies that there will be no cumulative effects assessment undertaken for the construction phase of the proposed development. For the avoidance of doubt, the assessment must assess potential for cumulative effects to arise during the construction phase. The cumulative effects assessment should be consistent with the wider temporal scope (see ID 2.2.4 above), accepting that the certainty of RFFP would diminish over time.

3.14.3	Appendix C, para 22.3.7	Methodology	The cumulative effects assessment must consider the sum of all impacts on a given receptor from all reasonably foreseeable future projects (RFFP). The Inspectorate therefore considers the proposed receptor-centric approach to the cumulative effects assessment to be appropriate. Whilst it is reasonable to exclude a RFFP from the assessment where its contribution would be negligible, the assessment should consider the potential for numerous minor (and not necessarily significant) effects to combine and result in a significant effect.
3.14.4	Appendix C, section 22.4	RFFP	The applicant's attention is drawn to the comments on Natural England in appendix 2 of this Opinion, which identifies plans or projects for consideration in the cumulative effects assessment.

APPENDIX 1: CONSULTATION BODIES FORMALLY CONSULTED

TABLE A1: PRESCRIBED CONSULTATION BODIES

Bodies prescribed in schedule 1 of The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 (as amended) (the 'APFP Regulations (as amended)')

SCHEDULE 1 DESCRIPTION	ORGANISATION
The relevant parish council(s) or, where the application relates to land [in] Wales or Scotland, the relevant community council	Leighton, Minshull Vernon and Woolstanwood Parish Council
	Warmingham Parish Council
	Crewe Town Council
	Moston Parish Council
	Church Minshull Parish Council
	Leighton Town Council
The Environment Agency	The Environment Agency
Natural England	Natural England
The Forestry Commission	North West and West Midlands
The Historic Buildings and Monuments Commission for England (known as Historic England)	Historic England
The relevant Highways Authority	Highway Department Cheshire West and Chester Council
	National Highways
The Health and Safety Executive	Health and Safety Executive
United Kingdom Health Security Agency, an executive agency of the	United Kingdom Health Security Agency

SCHEDULE 1 DESCRIPTION	ORGANISATION
Department of Health and Social Care	
NHS England	NHS England
Relevant statutory undertakers	See Table A2 below
The Coal Authority	Mining Remediation Authority
The relevant police authority	Police and Crime Commissioner for Cheshire
The relevant ambulance service	North West Ambulance Service
The relevant fire and rescue authority	Cheshire Fire and Rescue Authorities

TABLE A2: RELEVANT STATUTORY UNDERTAKERS

'Statutory undertaker' is defined in The APFP Regulations (as amended) as having the same meaning as in section 127 of the Planning Act 2008 (PA2008)

STATUTORY UNDERTAKER	ORGANISATION
The relevant Integrated Care Board	NHS Cheshire and Merseyside
NHS England	NHS England
The relevant NHS Trust	North West Ambulance Service NHS Trust
Railways	Network Rail Infrastructure Ltd
	National Highways Historical Railways Estate
Road Transport	The Manchester Ship Canal Company
Universal Service Provider	Royal Mail Group
Homes and Communities Agency	Homes England

STATUTORY UNDERTAKER	ORGANISATION
The relevant Environment Agency	The Environment Agency
The relevant water and sewage undertaker	United Utilities
The relevant public gas transporter	Cadent Gas Limited
	Northern Gas Networks Limited
	Scotland Gas Networks Plc
	Southern Gas Networks Plc
	CNG Services Ltd
	Energy Assets Pipelines Limited
	ES Pipelines Ltd
	Fulcrum Pipelines Limited
	GTC Pipelines Limited
	Harlaxton Gas Networks Limited
	Independent Pipelines Limited
	Indigo Pipelines Limited
	Inovyn Enterprises Ltd
	Last Mile Gas Ltd
	Leep Gas Networks Limited
	Mua Gas Limited
	Quadrant Pipelines Limited
	Stark Infra-Gas Limited
	National Gas
The relevant electricity distributor with CPO Powers	SP Manweb Plc
	Advanced Electricity Networks Ltd

STATUTORY UNDERTAKER	ORGANISATION
	AGR Networks Ltd
	Aidien Ltd
	Aurora Utilities Ltd
	Eclipse Power Network Limited
	Energy Assets Networks Limited
	ESP Electricity Limited
	Fulcrum Electricity Assets Limited
	Green Generation Energy Networks Cymru Ltd
	Harlaxton Energy Networks Limited
	Independent Distribution Connection Specialists Ltd
	Independent Power Networks Limited
	Indigo Power Limited
	Last Mile Electricity Ltd
	Leep Electricity Networks Limited
	Mua Electricity Limited
	Optimal Power Networks Limited
	Stark Infra-Electricity Ltd
	The Electricity Network Company Limited
	UK Power Distribution Limited
	Utility Assets Limited
	Vattenfall Networks Limited
The relevant electricity transmitter with CPO Powers	National Grid Electricity Transmission Plc
	National Energy System Operator (NESO)

TABLE A3: LOCAL AUTHORITIES AS DEFINED IN SECTION 43(3) OF THE PA2008

LOCAL AUTHORITY
Cheshire East Borough Council
Cheshire West and Chester Borough Council
Derbyshire County
High Peak Borough Council
Manchester City Borough Council
Newcastle-under-Lyme District Borough Council
Peak District National Park Council
Shropshire Council
Staffordshire County
Staffordshire Moorlands District Council
Stockport District Borough Council
Trafford Council
Warrington Borough Council

APPENDIX 2: RESPONDENTS TO CONSULTATION AND COPIES OF REPLIES

CONSULTATION BODIES WHO REPLIED BY THE STATUTORY DEADLINE:
Cheshire East Council
Environment Agency
Forestry Commission England
Health and Safety Executive
High Peak Borough Council and Staffordshire Moorlands District Council (combined response)
Historic England
National Gas Transmission
National Grid Electricity Transmission
Natural England
Network Rail
SP Energy Networks
The Coal Authority
Trafford Council
United Kingdom Health Security Agency
Warmingham Parish Council
Warrington Borough Council

Environmental Services
Infrastructure Decisions and Application Service
Planning Inspectorate
c/o QUADIENT
69 Buckingham Avenue
Slough
SL1 4PN

Development Management Service
Cheshire East Council
Town Hall
Macclesfield
Cheshire SK10 1DP

Tel: 0300 123 5014
[redacted]@cheshireeast.gov.uk

Date: 09/04/2026 OUR REF: 26/0074/NSIP YOUR REF: EN0310002

Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (The EIA Regulations) – Regulations 10 and 11 Application by Uniper (the applicant) for an Order granting Development Consent for the Salinae Hydrogen Storage Project (the proposed development)

EIA Scoping consultation response of Cheshire East Council

This letter provides the response of Cheshire East Council to the Peak Cluster pipeline EIA Scoping Report received on 13/03/2026. The Council is responding to this consultation as it is identified as a 'consultation body' as defined in the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 (as amended). The key document considered in the preparation of this response is the 'EIA Scoping Report dated March 2026.

The Council has reviewed the EIA Scoping Report and our comments on each environmental topic are set out below. We have also highlighted areas which we consider require further discussion with the Applicant to ensure that the EIA gives adequate consideration and assessment of the full impacts of this scheme.

The comments set out below are made on a without prejudice basis and having regard only to the material provided. We reserve the right to offer further comments on the scope of the Environmental Impact Assessment (EIA) in future submissions and other instances where insufficient information may have led to certain impacts being excluded from consideration. In such cases, the Council retains the right to challenge the adequacy of the EIA Scoping.

We note that the EIA Scoping report identifies that the Rochdale Envelope approach is being adopted in this instance. The Environmental Statement should be defined as

narrow as possible and should avoid multiple options being included in the assessment in order to avoid uncertainty and enable a complete and thorough assessment of all impacts in the Environmental Statement (ES).

Biodiversity

The parameters for the zone of influence for desk and field study as proposed as part of the scoping are considered acceptable.

The broad methodology for the assessment process is agreed. The Scoping Report does not however include a technical specification for the methodologies to be employed as part of the field surveys undertaken to inform the assessment. The Council would welcome the opportunity to agree these as part of the scoping exercise.

The range of potential effects that have been scoped in/out of the assessment process are considered acceptable.

Landscape and Visual

The methodology proposed for the LVIA is considered broadly acceptable however the following comments are noted.

The key receptors and viewpoints should be agreed with the Council Landscape team.

There is insufficient detail on the proposed 50m chimney stack. It is not clear from the detail submitted exactly how this would be designed, how often it would be in operation and whether it would include a visible flame (and the frequency of any visible flame). This could affect the approach to the LVIA.

The LVIA should be a minimum 10km radius study area, although a larger radii should be used for the flare to check it does not interfere with any long range views/panoramic viewpoints further away, including any listed parks and gardens and heritage assets.

If there would be a visible flare then it is considered that the current baseline study area for the LVIA should be much wider.

National Landscape Character should also be included in scope if the chimney is 50m high with a flame upon it.

Arboricultural impacts

Due to the complexity and scale of this scheme, the Council have not had sufficient time to fully assess the proposed scope to the assessment with regards to any arboricultural considerations. We would recommend that further detailed discussions are held with the Council Forestry Officer in the near future to agree an appropriate approach to the assessment and identification of mitigation.

Historic Environment

We would note the following points in respect of built heritage assets.

- The Eastern boundary of the proposed site borders directly with the Warmingham Conservation Area, within which there are a number of listed assets including a scheduled monument, additionally it is worth noting the character of the conservation area is noted as that of rural, open countryside and that "The line of the river is used to provide a clear eastern boundary to the conservation area.". The proposed boundary of the scoping does encroach upon this.
- North of the Warmingham Conservation Area is also Warmingham Grange (a Grade II Listed Building) though it sits outside the boundary of the scoping, it is in close proximity and the impact on this asset should be assessed.
- In the Northwest of the site is Park House (a Grade II Listed Building), it also sits outside the boundary but in close enough proximity that it would require assessment.
- It is worth noting that Hill Top Farm is very close to the salt workshops, pumps and tanks and though it appears to have been heavily adapted it is visible on tithe maps and should any original structures remain they could be considered to be a Non-Designated Heritage Asset.

We consider that there should be an impact assessment for these assets to fully understand the impacts in terms of heritage /setting in line with Historic England Guidance note 3 – setting of Heritage Assets.

Archaeology

The background information and proposed approach to the consideration of buried heritage assets is set out at various points in the Scoping Report and accompanying Appendices. These comprise:

1. Section 5.4 in the Scoping Report (Pages 32-35) gives a summary of the Baseline Conditions concerning Designated and Non-Designated Heritage Assets. These data have been obtained from Historic England's National Heritage List for England (NHLE) and the Cheshire Historic Environment Record.

2. Section 11 in the Scoping Report (Pages 77-79) tabulates the likely effect on the various aspects of the historic environment, including Designated and Non-Designated Heritage Assets, during both the construction of the development and its operation. It concludes that nearly all of these aspects are likely to be affected during both construction and operation of the development and, for this reason, are scoped into the proposed EIA. The only exception to this concerns Non-Designated Heritage Assets and currently unknown archaeological deposits during the operation of the development and it is proposed that this aspect of the historic environment is scoped out of the EIA.

3. Section 23 in the Scoping Report (Page 133) confirms that the results of the consideration of the Historic Environment and Archaeology will appear in Chapter 8 of the EIA and that consultation will be maintained with relevant parties during the EIA production process.

4. Figures 5.3 and 5.4 in Appendix A show the distribution of Designated and Non-Designated Heritage Assets within the proposed development area and in the 1km buffer zone around the limits of the development.

5. Appendix C (Section 11, Pages 19-24) sets out a detailed methodology for the production of the Historic Environment and Archaeology chapter in the proposed EIA. This confirms that all the usual sources of information will be consulted, in order to establish an up-to-date picture of the nature of the archaeological remains likely to be present within the development area. It will also attempt to establish the likely Sensitivity of any such deposits and the probable Impact of the development on them. This, in turn, will allow the overall Significance of Effect to be assessed. The report will also consider the effect of the development on the setting of Heritage Assets beyond the development area, with particular reference to those which are subject to statutory Designation.

The sections identified above represent an appropriate approach and the resulting report will assist in determining the need for further archaeological investigation. Additional works might include further evaluation in order to understand the nature of any archaeological features identified by the desk-based study as well as mitigation, where identified or suspected archaeological remains will be affected by the development. This mitigation may involve targeted programmes of excavation and programmes of observation and recording during development works. This approach is in line with the planning guidance noted in the Scoping Report and any necessary mitigation will be secured by Requirements attached to the Development Consent Order. The Cheshire Archaeology Planning Advisory Service will be happy to advise on the relevant section of the EIA and any preceding Preliminary Environmental Impact report (PEIR) when these become available.

Noise and Vibration

Due to the complexity and scale of this scheme, the Council have not had sufficient time to fully assess the proposed scope to the assessment with regards to noise and vibration. We would recommend that further detailed discussions are held with the Environmental Protection Team in the near future to agree an appropriate approach to the assessment and identification of mitigation.

Air Quality

On the basis of the information provided, the proposed methodology contained within Chapter 15 (Air Quality) is considered acceptable however the following points are noted.

The Council consider that all sensitive receptors and locations should be agreed in advance with our Environmental Health Team. In addition, we would ask that all the traffic data and speeds are agreed with the Council in advance.

As well as the predicted impacts on the selected receptors we would also request that the impacts on the diffusion tubes used for verification is also detailed in the assessment.

Given the nature of the site, we would recommend that liaison is undertaken with the Council at each stage of the assessment to enable us to provide detailed feedback.

Ground Contamination and soils

On the basis of the information provided, the proposed methodology contained within Chapter 13 (Geology and Soils) is considered acceptable however the following points are made.

Much of the site has been prioritised for further inspection under Part 2A of the Environmental Protection Act 1990, and as such the works should not worsen the land contamination risks.

Table 13-2 in Appendix C describes the magnitude of impact and typical descriptions for land contamination. Only human health, groundwater and surface water have been considered, however Table 13-1 in the Scoping Report also discusses risks to buildings. We would expect these to also be considered, even though these are not presented within the DMRB methodology. It may be that an alternative methodology is required, which may suit the site better.

We would recommend an environmental search be undertaken with us for this site, for information we may hold which may benefit the assessment. Search requests should be sent to landquality@cheshireeast.gov.uk in the first instance. We would expect to be consulted at each stage of the assessment for our comments, given the nature of the site.

Public Right of Way and Green Infrastructure

The site includes/is adjacent to a number of Public Rights of Way as recorded on the Definitive Map and Statement, the legal record of Public Rights of Way, working copy extract attached. These are:

- Public Footpath No. 4 in the Parish of Warmingham
- Public Footpath No. 7 in the Parish of Warmingham
- Public Footpath No. 8 in the Parish of Warmingham
- Public Footpath No. 13 in the Parish of Minshull Vernon.

We would request that the EIA should:

- Note that the Definitive Map and Statement is a minimum record of Public Rights of Way and does not preclude the possibility that Public Rights of Way exist which have not been recorded, and of which we are not aware. There is also a possibility that higher rights than those recorded may exist over routes shown as Public Footpaths and Bridleways.
- Refer to Public Rights of Way using the nomenclature depicted on the Definitive Map and Statement, listed above. Please note that recent changes to the name and number of PROW may have taken place following parish boundary changes.
- Include a condition survey of the Public Rights of Way within the development site, to take account of the surface, widths and path furniture on the route.
- Include an assessment of the impact of the proposed development on users of the Public Rights of Way, both during construction and post-construction. The EIA Scoping Report includes the visual impact on users of the PROW.
- Include a survey of usage of the Public Rights of Way within the development site in order to inform the assessment of impact, including:

    - 12-hour count of users, minimum 1 term-time weekday, 1 term-time weekend day, 1 school holiday weekday, 1 school holiday weekend day
    - Direction of travel
    - Mode of travel: pedestrian/wheeler/cyclist/equestrian
    - Age: 0-15yrs accompanied/0-15yrs unaccompanied/adult 16-59 yrs / adult 60yrs & over
    - Accompaniments (e.g. dog)
    - Indicator of disability.

Traffic and Transport

Due to the complexity and scale of this scheme, the Council have not had sufficient time to fully assess the proposed scope to the assessment with regards to traffic and transportation. We would recommend that further detailed discussions are held with the Strategic Infrastructure Team in the near future to agree an appropriate approach to the assessment and identification of mitigation.

General Comments

The EIA Scoping report in Table 6.1 and 6.2, and Table 16.1 and Table 16.2, along with paragraphs 5.9.10 and 5.9.11 refers to the proposal being located within, and potentially impacting on a Mineral Safeguarding Area (MSA) for Salt, and also refers to this MSA being identified within the Cheshire East draft Minerals and Waste Plan.

We would note that the draft Minerals and Waste Plan is now no longer being progressed as minerals and waste matters will now be included within the new Local Plan. The current adopted local plan (Cheshire East Local Plan Strategy, Site Allocations and Development Policies Document, and the saved policies of the Cheshire Replacement Minerals Local Plan) do not identify any areas of mineral safeguarding. The presence of

the mineral resource is known as identified in the British Geological Survey maps however there are no designated Mineral Safeguarding Areas.

We consider that the above points are necessary in order to ensure an adequate and thorough assessment of the impacts in the Environmental Statement. This statutory consultee response is provided without prejudice to any actions the Council may take as landowner should the need arise.

Yours Faithfully

Emma Williams

Principal Planning Officer
Cheshire East Council

creating a better place
for people and wildlife

Environment Agency

Planning Inspectorate ,
By email
salinaehydrogenstorage@planninginspectorate.gov.uk.

Reference: OR-0000843/01
Customer reference: EN0310002

10 April 2026

Dear Sir/Madam

EIA SCOING OPINION: application by UNIPER LTD (the applicant) for an order granting consent for Salinae Hydrogen Storage.

We have reviewed the Environmental Impact Assessment (EIA) Scoping Report dated March 2026, and associated appendices, insofar as they relate to our remit.

We broadly agree with the topics to be scoped in and out of further assessment within the Environmental Statement (ES). Our detailed comments are provided in the Appendix .

Our key points to highlight are:

Chapter 2.8 Decommissioning – The Scoping Report assumes decommissioning will occur in 2073. We do not agree with the statement that decommissioning can be scoped out of the ES, with a separate assessment as the facility reaches the end of its life. Decommissioining should be scoped in. We recognise that the detail for the decommissioning phase cannot be provided at this stage, but an Outline Decommissioning Plan should be provided with the ES. A mechanism to secure the future cost of decommissioning should be secured as part of the DCO.

Our detailed comments are provided in Appendix 1. Informatives for the applicant are provided in Appendix 2.

1. **Biodiversity and Ecology**
2. **Flood Risk**
3. **Water Environment – Water Resources**
4. **Water Environment – Water Quality and Water Framework Directive**
5. **Groundwater and Contaminated Land**
6. **Waste and Materials**
7. **Major Accidents and Disasters**

Please note this response does not represent our final view in relation to any future Development Consent Order (DCO), or any environmental permit applications made to us. Our final views will be based on all relevant information including applications and guidance available at the time of submission.

Yours faithfully

Liz Locke

Planning Specialist – National Infrastructure Team

creating a better place
for people and wildlife

NIteam@environment-agency.gov.uk

Appendix 1 – Detailed comments

Appendix 2 – Informatives

Appendix 1 – Detailed comments

1. Biodiversity and Ecology

Ecol 01 – Riparian buffer zones

Document Reference: EIA Scoping Report	
Section Reference:	
Issue	No reference is made to buffer zones around watercourses within the Scoping Report.
Impact	Insufficient buffer zones between development and watercourses can disrupt the integrity of the natural river corridor and impact riparian ecology. The free movement of riparian mammals can be restricted, there is a potential for habitat fragmentation, and potential impacts on water quality and aquatic ecology from any increases in sediment and pollutant run-off into rivers.
Solution	Development should maintain a riparian buffer around all watercourses including rivers and ditches. As a minimum this should be 10 metres from the top of the bank to align with Biodiversity Net Gain guidance. The 10m buffer includes • any permanent or temporary fencing installed as part of this development • any permanent or temporary lighting as this can interrupt free movement, feeding and resting • the storage of construction equipment and of sub-soil or topsoil where watercourses are being crossed by open trench excavations. • entry and exit pits where watercourses are crossed by trenchless techniques To reduce disturbance to riparian mammals during the construction phase, temporary construction compounds within 15 metres of watercourses should be screened with fencing on sides adjacent to the watercourse; and lighting should be positioned to avoid light-spill onto the watercourse.

Ecol 02 – Invasive non-native species

Document Reference: EIA Scoping Report, Section 5.2 and Chapter 9	
Issue	The EIA Scoping makes no reference to Invasive Species.
Impact	Potential that invasive species have not been included within the scope for the Preliminary Ecological Appraisal and so aren't accurately reported. Inaccurate reporting could lead to insufficient mitigation being proposed which could result in the uncontrolled spread of invasive species listed under Schedule 9 of the Wildlife and Countryside Act 1981 (as amended). Risk of legal non-compliance - the accidental spread of invasive species is an offence under the Wildlife and Countryside Act 1981.
Solution	Invasive species should be reported within the baseline condition (Section 5.2) and should be included as a receptor within Table 9-1 and 9-2. If absent, this should be

	clearly stated and the risk of spreading invasive species off-site to the site should be included as a receptor within Table 9-1 and 9-2. The implementation of biosecurity measures should also be included as a mitigation measure under Table 7-1.
Additional comments:	

Ecol 03

Document & chapter: EIA Scoping Report, Appendix C Methodologies, Chapter 9	
Issue	Lack of details regarding Ecological Survey Methodologies have been provided within Appendix C, Chapter 9. While we are satisfied with the desk study and field survey areas provided within Table 9-1 Desk and survey area for each ecological receptor, there is a lack of detail regarding the ecological surveys being undertaken including survey timings and methodology.
Impact	We are unable to assess survey methods or timings to determine if they follow best practice guidelines and would provide sufficient results to successfully determine habitat and species presence on site and therefore appropriate mitigation.
Solution	Details of survey methodologies for watercourses, otters and water vole should be included within Appendix C, Chapter 9. We would welcome the opportunity to review proposed methodologies prior to the survey work being completed and the results being included in EIA.
Additional dialogue / commentary:	

Ecol 04 – Eel Regulations

Additional commentary:
The River Wheelock falls within the footprint of this gas storage proposal, and as such potential construction and operation impacts to fish are correctly scoped in.

The current British Salt abstraction license (ref 2562002167) has no screening conditions attached to it, and if a variation to the license is required then Fisheries would seek to include a screening condition under the Eel Regulations (2009).

Future screening of the abstraction may also be considered and required, without a variation to the license, as a direct implementation of Section 17 of the Eel Regs.

2. **Flood Risk**

FR 01 – Flood risk during construction phase

Document & chapter: Saline Hydrogen Storage Project Scoping Report (March 2026)

Chapter 12 Table 12.1	
Issue	The Proposed Development may temporarily increase the risk of fluvial flooding during construction. Fluvial flood risk to the construction site has been scoped in for the construction stage. However, Table 12-1 does not consider the potential impacts from construction works on flood risk elsewhere.
Impact	Temporary construction activities such as increases in built footprint, raising of ground levels, or storage of materials within the 1 in 100-year fluvial floodplain could result in a temporary increase in fluvial flood risk. This risk is acknowledged in Table 6-1 and should be scoped into the assessment.
Solution	Fluvial flood risk during the construction phase should be explicitly scoped into the EIA. The assessment should acknowledge the potential for temporary increases in flood risk and ensure that a detailed Flood Risk Assessment identifies appropriate mitigation measures to manage both temporary and permanent impacts.
Additional dialogue / commentary: Any loss of fluvial flood storage should be compensated on a level-for-level and volume-for-volume basis. As the Proposed Development will be delivered in phases, it must be ensured that there is no net loss of fluvial flood storage during any phase. Where flood storage is lost temporarily, compensation should be provided within the same phase or in advance, so that no temporary or permanent loss of floodplain storage occurs.	

FR 02 – Operational phase assessment of flood risk

Document & chapter: Saline Hydrogen Storage Project Scoping Report (March 2026) Chapter 12	
Issue	Fluvial flood risk during the operational phase is scoped in. However, the scoping report does not clearly specify that flood risk will be assessed over the lifetime of the Proposed Development, using the 1 in 100-year plus climate change flood event.
Impact	Risk of incomplete scope of the flood risk assessment, potentially resulting in flood risk impacts over the operational lifetime of the development not being fully assessed or mitigated, particularly in the context of climate change.
Solution	The scoping should explicitly confirm that fluvial flood risk will be assessed over the entire lifetime of the development, with assessment of the 1 in 100-year plus climate change flood event.
Additional dialogue / commentary: The Applicant must consider future flood risk, accounting for climate change, and guided by the expected design life of the development. In line with the Planning Practice Guidance for Flood Risk and Coastal Change, a 75-year life expectancy is expected. To undertake the assessment of future flood risk, NPPF Annex 3: Flood risk vulnerability classification should be used alongside GOV.UK guidance *Flood risk assessments: climate change allowances*.	

FR03 - Works affecting watercourses or flood defence assets

Document & chapter: Saline Hydrogen Storage Project Scoping Report (March 2026) Chapter 12

Issue	The scoping report does not consider whether any existing flood defence assets may be affected by the Proposed Development, nor whether any main river crossings (temporary or permanent) will be required during the construction or operational phases.
Impact	The omission of these elements creates uncertainty around potential impacts on flood defence infrastructure and main rivers. If such works are required but not assessed, there is a risk that effects on flood risk, flow conveyance, or asset integrity are not fully understood or appropriately mitigated.
Solution	The scoping should explicitly identify whether the Proposed Development will involve works affecting flood defence assets or main rivers, including any temporary or permanent crossings. These elements should be clearly scoped into or out of the assessment, with appropriate justification provided.
Additional dialogue / commentary: Any works undertaken within 8 metres of a fluvial main river or flood defence asset will require a Flood Risk Activity Permit (FRAP). Early consideration of these requirements is recommended to inform the scope of the EIA and subsequent consenting process.	

3. Water Resources

WR 01 – Construction phase demands

Document Reference(s): Chapter 2 – Description of the Proposed Development; Chapter 12 Water Environment, Table 12.1	
Issue	Consumptive water demands other than solution mining during the construction phase have not been identified. For projects of this scale, water is often required (but not limited to) for potable supply for welfare stations; dust suppression; wheel wash; concrete batching; drilling fluids for HDD in cable/pipelines.
Impact	Water company supply is not always practical in rural locations; 3rd party tankering adds HGVs to local roads; GW abstraction is often limited and SW abstraction restricted to periods outside of low flows. The use of existing licences often requires changes to be made to determine the impact of additional purposes.
Solution	The Environment agency seeks confidence that a practical and sustainable source of supply is available to meet these temporary demands. A water supply strategy should be undertaken to evaluate all consumptive and non-consumptive water demands to establish or estimate volumes required and to appraise the sources of supply that are available to the project. This should cover basic construction demands listed above; solution mining; Hydrogen production; rewatering requirements for decommissioning.
Additional narrative/ explanation (if necessary) The water supply strategy can be incorporated into the Water Environment chapter of the Environmental Statement or it can be a stand alone document. It is acknowledged that exact	

volumes may not be known until more detailed design phases but estimates can provide an assessment that evaluates the potential limitations to water supply and options/contingency for supply in good time pre commencement.

WR 02 – Solution mining licencing

Document Reference(s): Chapter 2 – Description of the Proposed Development; Chapter 4.2 – Policy Statements ; Chapter 12 Water Environment, Table 12.1	
Issue	Not enough is known about the quantities of water required for solution mining and the intended use of the existing licence held by British Salt.
Impact	This licence is unconstrained and increased uptake could exacerbate prolonged dry weather and drought conditions.
Solution	The assessment should clarify the abstraction rates and overall volumes required, and how this may change over time affecting the increased use of the existing licence.
Additional narrative/ explanation (if necessary) The Environment agency agrees that the existing licence has significant headroom and already has the purpose of solution mining permitted. No licence changes would be required in this case. The applicant should however, take notice to NPS EN-1 (Energy infrastructure) section 5.16.7 which is not mentioned in section 4.2.	

WR 03 – Hydrogen production licencing

Document Reference(s): Chapter 2 – Description of the Proposed Development; Chapter 12 Water Environment	
Issue	The use of the existing British Salt licence for the operation of the LCHPP for Hydrogen production will require a formal change to the licence to add this additional purpose. The consumptiveness of the Hydrogen production process has not been evaluated.
Impact	It is possible if the Hydrogen production process is more consumptive than the purpose currently licensed (solution mining), that the addition of the purpose may result in the need to reduce licence quantities to compensate. This would need to be agreed with the licence holder (British Salt) and sufficient quantities would need to remain for this to remain viable.
Solution	This should not be scoped out of the assessment until volumes of water required for Hydrogen production are clarified in more detail. The assessment should

	evaluate the loss of water to the environment and how quantities required may vary at different times of the year.

Additional narrative/ explanation (if necessary)

It is acknowledged that the demand stated in the Water Environment table of effects is 18m3/hr. As a worse case scenario this equates to 432m3/day and 157,680m3 per year assuming 24/7/365 operation. This is a small proportion of the current licence volume and there appears to be significant headroom available based on recent actual use.

The licence is currently unconstrained however and this means that increased uptake during low flows, prolonged dry weather and drought will exacerbate impacts and longevity of such conditions.

The applicant should take notice to NPS EN-1 (Energy infrastructure) section 5.16.7 which is absent from section 4.2.

WR 04 – Decommissioning

Document Reference(s): Chapter 2 – Description of the Proposed Development; Chapter 12 Water Environment	
Issue	Not enough is known about the quantities of water required for rewatering of the cavities and if this will also rely on the use of the existing licence held by British Salt. Section 2.8 states that storage cavities will be decommissioned by rewatering, pumping brine or water into the cavities to displace the stored hydrogen
Impact	This water demand is likely to be substantial and sufficient supply may not be available.
Solution	The Environment agency seeks confidence that a practical and sustainable source of supply is available to meet these demands. A water supply strategy should be undertaken to evaluate all consumptive and non-consumptive water demands to establish or estimate volumes required and to appraise the sources of supply that are available to the project. This should cover basic construction demands previously listed; solution mining; Hydrogen production; and rewatering requirements for decommissioning.

Additional narrative/ explanation (if necessary)

The water supply strategy can be incorporated into the Water Environment chapter of the Environmental Statement or it can be a stand alone document. It is acknowledged that exact volumes may not be known until more detailed design phases but estimates can provide an assessment that evaluates the potential limitations to water supply and options/contingency for supply in good time pre commencement.

4. **Water Quality**

Chapter 12. We are satisfied that construction and operational impacts have been scoped in for named watercourses and Ordinary watercourses, and that a Water Framework Directive (WFD) Assessment is to be completed prior to starting works. We would welcome the opportunity to review this assessment, which should be submitted with the Preliminary Environmental Assessment (PEA).

WQ01 - Operational phase environmental management

Document & chapter: Scoping Report Chapters 12 and 13	
Issue	It is unclear what mechanism is proposed to define and secure environmental protection during the Operational phase.
Impact	Potential for necessary mitigation not to be adequately defined and/or secured.
Solution	The Applicant should provide further detail of proposed environmental management plans including an Operational phase environmental management plan (OEMP), a surface water management, emergency response plans and confirmation of how these would be secured.

WQ02 – Foul water management

Document & chapter: Chapter 2: Description of the Proposed Development; Chapter 6: Likely Impacts of the Proposed Development; and Chapter 12: Water Environment and Flood Risk	
Issue	Foul water Table 2-1 suggests that there will be welfare facilities, but further information is not provided. Therefore, foul water management is unclear. Tables 6-1 and 6-2 do not mention foul water as an impact during construction or operation. Tables 12-1 and 12-2 also do not identify foul water as an effect during construction or operation for Water Environment and Flood Risk. Therefore, foul water is not appropriately scoped in.
Impact	If foul water is not appropriately scoped in, the risks may not be adequately assessed and could caused a deterioration in water quality.
Solution	Foul water management during all phases of the development must be scoped in and be assessed in the Environmental Statement.
Additional dialogue / commentary: If sewage will be discharged to public sewer, you should consult with the local water company to ensure that adequate sewer capacity is available, and no adverse effects will occur because of the connection. If treatment and discharge at the site is required, you should consider any potential impacts of this discharge and confirm that a water discharge activity permit will be	

sought. If road transport to an offsite disposal facility is required, then there should be regard for this within the waste management procedures.

WQ03 – Effects on River Wheelock

Document & chapter: Chapter 12: Water Environment and Flood Risk	
Issue	Impacts to River Wheelock not scoped in Table 12-1 for the effects of 'Drainage outfalls' and 'Site clearance, excavation, earthworks, and installation of hardstanding areas' is not scoped in as an effect to River Wheelock (only Ordinary Watercourses). Table 12-2 for the effects of 'Drainage outfalls' and 'Waste water discharge for the LCHPP' is not scoped in as an effect to River Wheelock (only Ordinary Watercourses).
Impact	Not identifying an impact to main rivers could result in a negative effect on water quality if an impact is not identified and managed.
Solution	The Applicant should scope in these impacts during construction and operation as an effect to main rivers too.
Additional dialogue / commentary: If the Applicant is of the belief that these impacts will have no effect on the River Wheelock, then they must adequately explain this before scoping out. However, considering that there is no mention in Table 12-1 or Table 12-2 of the impact of these on the main river, as opposed to stating that it is scoped out, it currently appears to be missed.	

WQ04 - Contaminant and drilling risk to water

Document & chapter: Chapter 12: Water Environment and Flood Risk; and Chapter 13: Geology and Soils	
Issue	Contaminant and drilling risk to water Table 13-1 scopes in 'Drilling of the Subsurface' and 'Mobilisation of contaminants' for construction for Geology and Soils (which we agree with); however, they have not included these risks to the Water Environment in Table 12-1. The description of drilling of the subsurface recognises that there could be a loss of drilling fluids to surface or groundwater bodies, however only 'groundwater bodies' is named as a receptor.
Impact	Drilling fluids and mobilise contaminants in soils pose a water quality risk to surface waters, as well as groundwater bodies, due to surface water runoff.

Solution	Table 12-1 should be updated to reflect that 'Drilling of the Subsurface' and 'Mobilisation of contaminants' for construction can also pose a risk to water quality of surface waterbodies, not just groundwater.
Additional dialogue / commentary: We note that Table 13-2 scopes out the 'Mobilisation of contaminants' for operation for Geology and Soils. Although we understand that contamination risk from historical tanks on Site and risks from potential leaks and spills may be managed pre-construction, we still believe that this risk to Water Environment should be reflected in Table 12-2 too for consistency.	

WQ05 - Landfill leachate in operation

Document & chapter: Chapter 12: Water Environment and Flood Risk; and Chapter 13: Geology and Soils	
Issue	Landfill leachate in operation 'Landfill leachate release' is scoped in for the Water Environment for both River Wheelock and Ordinary Watercourses for construction in Table 12-1, but there is no mention of it during operation in Table 12-2, despite it being included Table 13-2 for Geology and Soils.
Impact	Watercourses are named at the receptor in Table 13-2, so there is a clear impact on water quality from landfill leachate.
Solution	The Applicant should scope in 'Landfill leachate release' during operation too for the surface watercourses and update Table 12-2.
Additional dialogue / commentary: We note that 'Landfill leachate release' is not included in Table 13-1 for Geology and Soils for construction, and we believe it should be scoped in for consistency with Table 12-1.	

5. Groundwater and Contaminated Land

GWCL 01 – Environment Agency groundwater protection guidance

Document Reference(s): Scoping Report Appendix 3 Chapter 12 and Chapter 13	
Issue	The guidance section does not include Environment Agency 2018, The Environment Agency's approach to groundwater protection. This document details our approach to groundwater protection and explains what activities can and cannot take place on Principal and Secondary aquifers, and within Source Protection Zones.
Impact	Risk of inappropriate activity / inappropriate mitigation in areas of groundwater.

Solution	Follow the Environment Agency's approach to groundwater protection, Groundwater protection - GOV.UK (www.gov.uk); The Environment Agency's approach to groundwater protection (publishing.service.gov.uk) to ensure sufficient mitigation to pollution is incorporated into the design.

GWCL 02 - Environment Agency Land Contamination Risk Management (LCRM) guidance

Document & chapter: Scoping Report Chapter 13, Appendix 3 Chapter 13	
Issue	The Scoping Report states in multiple locations that intrusive investigations will be carried out in accordance with BS10175:2011+A2:2017 but does not refer to Environment Agency's Land Contamination Risk Management (LCRM) guidance.
Impact	If a Conceptual Site Model and assessment of risks are not carried out in accordance with LCRM some pollution related impacts may not be suitably assessed and mitigated against.
Solution	Chapter 13 of the report should refer to assessment of risks from soil and groundwater contamination in accordance with LCRM guidance.
Additional dialogue / commentary: **Land contamination risk management (LCRM) - GOV.UK**	

GWCL 03 – Study area buffer

Document & chapter: Scoping Report Chapter 5 Section 5.6	
Issue	A 250m study area buffer has been applied for assessment of impacts relating to geology, hydrogeology and soils.
Impact	The assessment may not account for potential impacts to sensitive groundwater receptors beyond 250m of the Site boundary.
Solution	The Applicant should expand the study area buffer for impacts to hydrogeological receptors.

GWCL 04 – landfill sites

Document & chapter: Scoping Report Chapter 5 Sections 5.6.18	
Issue	The report notes the presence of several landfill sites (Authorised and historic) within the Site boundary. Our records are not fully consistent with the information provided in the report, and further information may be available.
Impact	Potential for characterisation of hazards posed by landfills to be underestimated.
Solution	The Applicant has identified that they have consulted with the Environment Agency and British Salt Limited on the accepted wastes and construction details of the onsite landfills. We recommend that the Applicant also submits an information request to the Local Authority for details of historic landfills.

Additional dialogue / commentary: Our records indicate that Hilltop Brinefield historic Landfill had a license issued in 1990 and was authorised to receive inert and non-flammable substances at a maximum of 1,215 tonnes/day. Our records show the British Salt Limited Authorised landfill to be in 'effective' status, licensed to receive >10T/D with a capacity of over 25,000T excluding Inert Waste. Our records show a second historic landfill site also named Hilltop Brinefield had a licence issued in 1995 and received inert and non-flammable substances at a maximum of 1,215 tonnes/day.

GWCL 05 – Groundwater receptors

Document & chapter: Scoping Report Chapter 5 Sections 5.6.20 to 5.6.23	
Issue	The report excludes some key groundwater receptors and potential impacts
Impact	Potential for some groundwater receptor types, and impacts to these, to be missed in assessment
Solution	The Applicant should include the following groundwater receptors, and define impact magnitudes for them: • Public and private water supply groundwater abstractions; • Groundwater dependent terrestrial ecosystems (GWDTEs); and • WFD Groundwater bodies.
Additional dialogue / commentary: The report does not identify the presence of a WFD Groundwater body underlying the Site, the Weaver and Dane Quaternary Sand and Gravel Aquifers WFD Groundwater body (ref. GB41202G991700). One designated Local Nature Reserve, Ridding Farm Ponds, is present in the southern part of the site. Depending on connectivity with low permeability superficial strata, these may be Groundwater Dependent Terrestrial Ecosystems (GWDTE) and may be impacted by construction and operational activities. The report does not currently consider unlicensed private groundwater abstractions within the study area. We encourage the Applicant to submit an information request to the Local Authority to obtain details of any records of water abstractions.	

GWCL 06 - Groundwater impacts from Construction phase

Document & chapter: Scoping Report Chapter 13 Table 13-1	
Issue	There is potential for impacts to sensitive groundwater receptors from additional construction phase activities that are not identified in Table 13-1.
Impact	Risk of contamination of groundwater

Solution	Additional potential impacts to sensitive groundwater receptors should be considered.

Additional dialogue / commentary:
The following activities should also be considered in Scoping, either in Chapter 13 Geology and Soils or Chapter 12 Water Environment and Flood Risk:

- Spills and leaks during construction activities;
- Construction dewatering;
- Drilling within deep geology;
- Release of mobile contamination from landfill site(s); and
- Piling and other deep foundation construction activities.

GWCL 07 – Groundwater impacts from Operational phase

Document & chapter: Scoping Report Chapter 13 Table 13-2	
Issue	Impacts to groundwater bodies from mobilisation of existing contaminants during the operational phase has been Scoped Out.
Impact	Risk of pollution to sensitive groundwater receptors from operational phase activities that are not currently identified.
Solution	Additional potential impacts to sensitive groundwater receptors should be considered.

Additional dialogue / commentary:

The following should also be accounted for in Scoping, either in Chapter 13 Geology and Soils or Chapter 12 Water Environment and Flood Risk:

- Spills and leaks during operational activities;
- Loss to ground of pollutants in the event of leakage or other loss of containment (e.g. brine storage and transfer infrastructure, wastewater, fuel, oil and chemical storage);
- Drilling within deep geology; and
- Leakage from solution caverns and/or injection/extraction boreholes.

There are two major north-south trending faults located within the Site and study area, the onsite King Street Fault crossing the Site to the immediate east of the East Cavern Plot and proposed Gas Processing Plant, and Winsford Fault to the West of the site. Assessment of potential risks from the proposed solution mining and gas storage activities should take account of the potential for preferential migration along existing fractures.

<u>Hydrogen storage in salt caverns</u>

The Application should be supported by assessments which demonstrate the suitability of the site for solution mining and subsurface bulk hydrogen gas storage, including considerations such as the ability of hydrogen molecules to penetrate into cracks and void spaces, the

anticipated cyclicity of gas movement into and out of the solution mined caverns, and the potential for reactivity at borehole injection sites from microbial activity.

The Chief Scientist's Group at the Environment Agency has published a study exploring how the structural integrity of underground salt caverns is affected by the storage of hydrogen. Further information is available at the following link: The geomechanics of hydrogen storage in salt caverns: environmental considerations: summary - GOV.UK.

The Chief Scientist's Group has also published a report on the environmental implications of energy storage technologies, inclusive of hydrogen storage: Environmental and social implications of energy storage technologies.

Brine
Tertiary containment of polluting brine is necessary to ensure adequate containment for all brine storage. Highly saline water is a serious pollutant and can be irrecoverable in many aquifers. The CIRIA 736 guidance should be BAT for this development.

GWCL 08 – Impact of heat

Document & chapter: Scoping Report Chapters 12 and 13	
Issue	The Applicant has not considered potential impacts to sensitive controlled waters receptors, resulting from thermal emissions from underground compressed gas pipelines.
Impact	Impacts from the Proposed Development to sensitive controlled water receptors may not be identified and mitigated.
Solution	The Applicant should assess the potential for heat emissions from buried pipelines or cables to impact groundwater, surface water and groundwater dependent terrestrial ecosystems (GWDTEs) during the Operational phase.

Additional dialogue / commentary:

Heat as a Pollutant

Heat as a groundwater pollutant was introduced in 2023 via the Environmental Permitting (England and Wales) (Amendment) (England) Regulations 2023 SI No.2023/651:
""pollutant", in relation to England, means any—

a. *substance,*
b. *heat, or*
c. *biological entity or micro-organism,*

which is liable to cause pollution;"

We are mindful that work is being carried out in this area in relation to heating of groundwater from ground source heating and cooling systems but there is currently no guidance relating to the potential thermal implications of buried pressurised gas transportation pipelines.

The Environment Agency's Chief Scientist's Group has published a report for Ground Source Heating and Cooling (GSHC) systems (Environmental Impacts of Temperature Changes from Ground Source Heating and Cooling Systems). In this study, a 'thermal plume' was defined as the region around a GSHC system that experiences a 1 degree C temperature change or greater. While the study is not directly applicable to thermal emission from underground pressurised gas pipelines, an equivalent benchmark could be considered when assessing heat pollution from such pipelines. The Chief Scientist's Group states that the environmental factors with the greatest influence on thermal plume development include groundwater flow and bulk thermal conductivity. It identifies that impacts may occur by direct (temperature change) and indirect (e.g. changes in water chemistry) means. At this stage we require the potential thermal implications of pressurised gas pipelines, in relation to risks to groundwater, to be considered further via desk-based assessment.

GWCL 09 – Foundation works

Document & chapter: Scoping Report Chapters 12 and 13	
Issue	Proposed foundation design details are currently lacking detail.
Impact	Potential for foundation construction to result in the creation of pollutant mobilisation pathways and the creation of new groundwater flow pathways. A significant proportion of the Site comprises historic and/or Authorised landfill.
Solution	The Applicant should commit to the preparation of Foundation Works Risk Assessments for piled and deep foundation structures, informed by intrusive ground investigations conducted in accordance with best practice guidance including BS10175:2026 and LCRM.
Additional dialogue / commentary: The Applicant should refer to the updated guidance on piling on sites affected by contamination: Piling and Penetrative Ground Improvement Methods on Land Affected by Contamination: Guidance on Pollution Prevention	

GWCL 11 - Sustainable drainage systems

Document & chapter: Scoping Report Chapter 2 Section 2.6.4	
Issue	The Applicant proposes to attenuate and manage surface water runoff from the Proposed Development through implementation of Sustainable Drainage Systems (SuDS). Chapter 5 of the report indicates that Made Ground and landfilled waste materials are likely to be encountered within the Site.
Impact	If not adequately designed and managed, SuDS infiltration systems could result in the leaching and mobilisation of existing contamination, and/or the introduction of new sources of contamination from spills and leaks.
Solution	Further details of proposed surface water management at the Proposed Development, including any proposed SuDS, should be provided when available.

Additional dialogue / commentary: 1. Infiltration sustainable drainage systems (SuDS) such as soakaways, unsealed porous pavement systems or infiltration basins shall only be used where it can be demonstrated that they will not pose a risk to the water environment. 2. Infiltration SuDS have the potential to provide a pathway for pollutants and must not be constructed in contaminated ground. They would only be acceptable if a phased site investigation showed the presence of no significant contamination. 3. Only clean water from roofs can be directly discharged to any soakaway or watercourse. Systems for the discharge of surface water from associated hard-standing, roads and impermeable vehicle parking areas shall incorporate appropriate pollution prevention measures and a suitable number of SuDS treatment train components appropriate to the environmental sensitivity of the receiving waters. 4. The maximum acceptable depth for infiltration SuDS is 2.0 m below ground level, with a minimum of 1.2 m clearance between the base of infiltration SuDS and peak seasonal groundwater levels. 5. Deep bore and other deep soakaway systems are not appropriate in areas where groundwater constitutes a significant resource (that is where aquifer yield may support or already supports abstraction). 6. SuDS should be constructed in line with good practice and guidance documents which include the SuDS Manual (CIRIA C753, 2015) and the Susdrain website. For further information on our requirements with regard to SuDS see our Groundwater protection position statements (2017), in particular Position Statements G1 and G9 – G13 available at: https://www.gov.uk/government/publications/groundwater-protection-position-statements

GWCL 12 – Mining Remediation Authority (MRA)

Document & chapter: Scoping Report	
Issue	The report does not consider whether the Mining Remediation Authority should be informed of this proposal.
Impact	Risk that previous mining activity may not be identified and any mitigation considered.
Solution	If there has been any former mining within 1km of the site boundary (regardless of depth), then the MRA need to be informed and their consent sought.

6. Waste and Materials

WM01 – Mining Waste Directive

Document & chapter: Scoping Report Table 21.2	
Issue	The report does not consider potential implications under the Mining Waste Directive
Impact	Risk of non-compliance with relevant legislation.
Solution	Review the proposal in relation to this legislation.

Additional dialogue / commentary:
Solution mining used to create salt for commercial purposes constitutes recovery of a mineral and as such any qualifying wastes (eg drill cuttings, discarded drilling fluids, brine filter / treatment waste etc.) produced in its recovery are "mining waste" and must be regulated as a mining waste activity under EPR 2016.

7. Major Accidents and Disasters

It is noted that the Proposed Development would fall within the current scope of the Control of Major Accident Hazards Regulations 2015 (COMAH) as a new upper tier COMAH establishment, based on the quantities of dangerous substances that would be stored or handled being greater than the 50 tonne threshold for hydrogen in Schedule 1 (Part 2) to the Regulations. The COMAH regulations are enforced by the Competent Authority (CA), comprising the Health and Safety Executive (HSE) and the relevant environmental regulator: the Environment Agency (EA) in England, acting jointly. Another COMAH establishment is located within the site for the Proposed Development, and potential 'domino effect' hazards will be included for consideration as part of the MA&D assessment, and in due course under the COMAH regulatory requirements. It is noted that the Process Safety Strategy (PSS) and the Passive and Active Fire Protection Philosophy are being developed as part of the Pre-FEED stage, including the strategy for compliance with the COMAH Regulations, as well as the mitigation strategies for potential fire and explosion type events.

Appendix 2 – Informatives / Advice for Applicant

1. Flood Risk

1.1. Flood Risk Activity Permits (FRAPs)

The Environmental Permitting (England and Wales) Regulations 2016 require a permit to be obtained for any activities which will take place:

- On or within 8 metres of a main river (16 metres if tidal)
- On or within 8 metres of a flood defence structure or culvert (16 metres if tidal)
- On or within 16 metres of a sea defence
- Involving quarrying or excavation within 16 metres of any main river, flood defence (including a remote defence) or culvert.
- In a floodplain more than 8 metres from the river bank, culvert or flood defence structure (16 metres if it's a tidal main river) and you don't already have planning permission.

For further guidance please visit https://www.gov.uk/guidance/flood-risk-activities-environmental-permits or contact our National Customer Contact Centre on 03702 422 549. It is noted that the developer may be a protected undertaker, for which exemptions could apply. Please refer to the following guidance: https://www.gov.uk/government/publications/environmental-permitting-regulations-exempt-flood-risk-activities/exempt-flood-risk-activities-environmental-permits.

The applicant should not assume that a permit will automatically be forthcoming once a Development Consent Order (DCO) has been approved, and we advise the to consult us at the earliest opportunity.

1.2. Disapplication

If any of the works are likely to require a FRAP, we recommend that you inform the Environment Agency at the earliest opportunity, as to whether you are seeking to disapply the Environmental Permitting Regulations (England and Wales) 2016 for flood risk activities as part of the DCO. Please note that the DCO will need to include protective provisions for our benefit if the disapplication of FRAPs is sought.

1.3. Sequential approach

In accordance with the National Planning Policy Framework and the sequential test (paragraph 168), development should apply a sequential, risk-based approach to the location of development, taking account of all sources of flood risk and the current and future impact of climate change, to avoid (where possible) flood risk to people and property. The project should take a sequential approach where it can, and if there are any opportunities for development to be located outside of Flood Zones 2 and 3 this should be prioritised. A sequential approach should be taken to any site layout decisions within the site boundary, locating the most

vulnerable elements of the development to areas of the lowest risk. The most vulnerable development may be any equipment that would be damaged by flood waters. This approach should also be applied to the construction phase of the development.

1.4. Flood modelling

The developer should consider fluvial flood modelling for watercourses which intersect with the Order Limits to better understand fluvial flood risk. It is important to note that some of our model data is old and may present limitations. Even the data which is more recent may not be suitable for the purposes you wish to use it for and should modelling work be required in connection with the activities, it will be necessary to check that the data used represents current risk, uses the latest available datasets, complies with current modelling standards, is at a scale suitable for the assessment you're undertaking, captures the detail required for a site-specific assessment, makes use of current climate change allowances. This is emphasised within the guidance on Using Modelling for Flood Risk Assessments (December 2023) available online at Using modelling for flood risk assessments - GOV.UK (www.gov.uk).

Please be aware that:

- Environment Agency models are not designed to assess third-party developments. The developer should not assume that the model is suitable for assessing the flood risk associated with the proposed development.
- It is the developer's responsibility to assess the suitability of a model for the project.
- The developer should provide evidence of any modelling checks and subsequent updates and document these in the FRA model reporting.

Note that if the catchment size is less than 3km^2, then the flood risk may not be represented by the Flood Map for Planning and that there may exist an evidence-gap.

2. Watercourse Crossings

General considerations for watercourse crossings and landfall

The following are general guiding principles to consider when designing watercourse crossings / coastal landfall to avoid negatively affecting geomorphology and natural processes:

- Avoid unnecessary interference with natural processes. For instance, encourage use of trenchless techniques such as Horizontal Directional Drilling (HDD) to minimise the likelihood of cables entering the water environment.
- Ensure watercourse crossing design is informed by assessment of fluvial processes and geomorphology. For example, depth of HDD crossing should consider the likelihood of vertical channel change.
- Ensure coastal landfall infrastructure is located outside of areas expected to be impacted by coastal change over the duration of the project.
- Avoid designs which present legacy risks to natural processes and geomorphology beyond the project lifespan. For example, infrastructure such as access tunnels which

are left in-situ after decommissioning could be exposed by future coastal erosion or river movement, becoming an impediment to natural processes.

- Consider opportunities to deliver Water Framework Directive (WFD) mitigation measures/ Biodiversity Net Gain (BNG) uplift as part of the design.
- Avoid preventing delivery of mitigation measures, e.g. avoid bringing cables to surface level in floodplains earmarked for future river restoration or flood defence works (including construction of bypass channels).

Notes:

i. WFD applies to all surface waterbodies, not just those designated for monitoring purposes.

ii. Small watercourses and WFD - watercourses with a catchment less than 10km/2 connected to a downstream WFD waterbody take the classification of that waterbody.

ii. BNG guidelines indicate that structures built within 10 m of the bank top of a watercourse qualify as encroachment, which may affect the uplift score calculated using the BNG Watercourse metric.

[*BNG guidance is mentioned here because our usual easement for structures, operations, launch pits is to be at least 8m away from the watercourse bank or landward base of fluvial defence structure/embankment (16m if defence structure is for tidal purposes). As stated in the note above, BNG watercourse metric considers anything within 10m of banktop to be encroaching on the watercourse*.]

- Any potential construction, operational, and decommissioning phase impacts that the proposed scheme may have on the river must be subject to a WFD Assessment to our satisfaction.
- Any infrastructural developments on river/floodplain environments should be designed and delivered to have a minimal impact on natural river dynamics (e.g. erosion, deposition, meander migration etc.) and should not place any significant limitations on future river restoration projects.
- Geomorphologically dynamic behaviour is deemed likely to intensify in the next decades in line with Flood Estimation Handbook (Flood Estimation Handbook (FEH) | UK Centre for Ecology & Hydrology (ceh.ac.uk). Therefore, any infrastructure developments should also take some account of the likelihood for increased lateral and vertical river dynamics anticipated to result from continued hydro-climatic intensification (e.g. 'a flood-rich epoch') over the remainder of the 21st century (i.e., future proofed designs that are not just based on present-day baseline geomorphological configuration/behaviour).
- If river crossings (bridges, culverts, and buried cables) are required as part of the development, we would expect to see geomorphologically robust designs that will

cause minimal impacts on natural fluvial processes operating in the river/floodplain environment over the course of the 21st century.

Further guidance in regard to river crossings can be found in the following document:

SEPA, 2010. Engineering in the water environment: good practice guide River crossings Second edition. SEPA

Watercourse sensitivity

- Care should be taken by applicants when determining watercourse sensitivity, especially the use of Q95 scores. Rivers with a higher Q95 flow are not more sensitive than rivers with a lower Q95. In the case of water quality, the reverse of this is true, with less dilution meaning a higher sensitivity to change. Some watercourses with low Q95 may also be winterbournes, and therefore cannot accommodate change easily, as they would be dry for most of the year.
- WFD designation is a method of monitoring and classifying the ecological health of the water environment and not an indication of greater or lesser sensitivity to change. Therefore, watercourses with a WFD designation are no more sensitive than those which have not been designated.

Sensitivity to change cannot be determined from a desk study alone. When determining the sensitivity of a watercourse, the applicant should ensure that professional judgement and the results of any surveys are also incorporated into the assessment.

3. Water Quality

Document & chapter: Chapter 2: Description of the Proposed Development	
Issue	Unknown discharges Table 2-1 suggests that during construction there will be temporary construction compounds and that the low carbon Hydrogen Production Plant (LCHPP) will have wastewater treatment and disposal infrastructure. Additionally, section 2.5.8 suggests that there will be brine solution which is forced up to the surface. However, it is unclear what discharges are proposed, and if they will be to the River Wheelock, to Hoggins Brook or other currently unnamed surface waters.
Impact	Discharges to surface waters can reduce water quality unless they are suitably managed, and have the correct permissions.
Solution	The Applicant should be advised that receptor risks must be fully identified in relevant chapters of the Environment Statement. Where there may be discharges associated with built infrastructure, drainage features or creation of the salt caverns these should be clearly explained with locations, and management of the discharges.

	Water discharge activity permits may be needed and further guidance is available at: Discharges to surface water and groundwater: environmental permits - GOV.UK
Additional dialogue / commentary: We understand from section 2.6.18 that the LCHPP will discharge to a suitable receptor, which could be via a surface water outfall, which will be confirmed in the Environment Statement. Where there are discharges to surface waters, they will require a WFD Assessment.	

Document & chapter: Chapter 2: Description of the Proposed Development; and Chapter 7: Mitigation	
Issue	Surface water management Section 2.6.4 suggests that there will be surface water runoff management during operation, however it is unclear how it will be managed during construction and decommissioning. Table 7-1 says that surface water runoff will be attenuated and managed through Sustainable Drainage Systems, but there is no mention of using this to improve water quality, only flooding risk.
Impact	Surface water strategy must be suitably designed to manage the risks from sediment, hydrocarbons, heavy metals and other hazardous substances which could decrease water quality if these contaminants reach receiving surface watercourses. If SuDS are unmaintained debris and/or sediment could accumulate and prevent them from effectively managing drainage.
Solution	The Applicant should ensure that is it clear that SuDS can be used to improve water quality, as well as flooding risk. They should commit to producing a Surface Water Management Plan, this could be as an Appendix to the Construction Environmental Management Plan (CEMP). They should use the CIRIA SuDS Manual (C753F), and use it to inform types of SuDS proposed.
Additional dialogue / commentary: The Applicant should also be advised that where SuDS are proposed, they will need to ensure there is a SuDS Maintenance schedule to ensure they are not blocked and are performing their required water quality treatment.	

Document & chapter: Chapter 2: Description of the Proposed Development; and Chapter 7: Mitigation

Issue	General construction best practice is unclear. Table 7-1 on Mitigation says that there will be a framework CEMP, which will include potential impacts from earthworks, dust generation, and waste generation etc, however we believe other activities during construction, such as concrete laying, should be included in this list.
Impact	There is a risk to deteriorating water quality if hazardous substances during construction get into surface runoff and is subsequently discharged.
Solution	It should be made clear that the CEMP will also include concrete management and surface water management through controlling sediment and any potential spills of hazardous substances. It is stated that all work will be carried out in accordance with the relevant guidelines. The Applicant should be aware of Pollution prevention for businesses - GOV.UK and Oil storage regulations for businesses - GOV.UK For sustainable drainage, they should refer to the CIRIA SuDS Manual (C753).

Additional dialogue / commentary:

We appreciate that details will be limited at scoping stage but recommend further details are added into Table 7-1 where possible.

A framework Construction Environmental Management Plan (fCEMP) should include:

- Buffer distances of at least 10m from watercourses
- Refuelling to only take place on impermeable surfaces, and in bunded areas
- Chemical, oil and fuel storage to be bunded, with impermeable base, volume sized for 110% and covered to protect from accumulation of rainwater
- Collecting and removing any contaminated water from site (i.e. from wheel wash and concrete washout facilities), and not allowing this to be discharged to surface waters.

Chapter 2 describes that there will be parking onsite, the Applicant should be aware that oil interceptors may be required.

Document & chapter: Chapter 2: Description of the Proposed Development; and Chapter 6: Likely Impacts of the Proposed Development	
Issue	Biocides and Brine leaks Section 2.5.19 suggests that there could be biocide or chemical inhibitors injected into the cavern. It is unclear how these substances will be stored onsite and if there will be any connectivity to the water environment. Table 6-2 does not identify the changes in risks of pollution of soils and water, associated with brine leaks or chemical used for cavern maintenance as a Water

	Environment topic. It is only listed as a 'Human Health' topic, but there is no mention of these risks elsewhere in the table.
Impact	Biocides, brine and chemicals can reduce water quality if there is a pathway into surface waters or groundwaters.
Solution	The Applicant must confirm any connectivity with the caverns and the water environment, for both groundwater and surface waters. If biocides, or chemical inhibitors, will be stored onsite they must be suitably managed. They should specifically include brine leaks as a risk to the Water Environment, and ensure that measures to manage this risk is clarified.

Document & chapter: Chapter 2: Description of the Proposed Development	
Issue	Substation fire risk Section 2.5.24 suggests that there will be a new 33kV sub-station. There could be a fire risk associated with this, and pollution risks from equipment such as transformers.
Impact	There is s risk to water quality in the event of a fire event or leak from equipment at the substation.
Solution	The substation drainage should be managed such that there is a mechanism, eg a penstock, which can isolate the drainage in the event of a fire or pollution incident. Transformers, and other equipment containing hazardous substances, must be bunded.

Document & chapter: Chapter 6: Likely Impacts of the Proposed Development; and Chapter 7: Mitigation	
Issue	Drilling fluid Table 6-1 does not identify drilling fluid leaks as a potential construction phase impact. We note in Table 7-1 that it mentions that there may be use of trenchless construction methods, such as Horizontal Directional Drilling (HDD), however there is no mention of a drilling fluid breakout plan.
Impact	Drilling fluids can reduce water quality if there is a breakout and it reaches surface waters.
Solution	Drilling fluid should be identified within 'Drilling of the subsurface' impact and the Water Environment should be added as a Relevant Topic. Alternatively,

	drilling fluid leaks could be added into the description for 'Pollution incidents during construction' impacts, but it should be clearly recognised that this is a risk for the water quality.
Additional dialogue / commentary: We acknowledge that drilling fluid losses in included in the description for 'Drilling of the subsurface' Table 13-1. Drilling fluid often uses bentonite pellets, which maybe coated in PFAS. The applicant should seek to use PFAS-free materials.	

Document & chapter: Chapter 6: Likely Impacts of the Proposed Development	
Issue	Contamination risks to water Tables 6-1 and 6-2 does not include the Water Environment as a relevant topic for the construction or operation impacts of 'Mobilisation of contaminants'. Additionally, in Table 6-2, 'Landfill leachate release' does not include the Water Environment as a relevant topic for the operational impacts.
Impact	Contaminants in soils which are mobilised, or landfill leachate, will decrease water quality if they are able to receive surface waterbodies via a pathway from surface water runoff.
Solution	The Relevant Topics should be updated to name the Water Environment, so that it is correctly identified that contaminants from soils or the historical tanks can affect water quality.
Additional dialogue / commentary: Table 6-1 does correctly identify the Water Environment as a relevant topic for 'Landfill leachate release' during construction.	

Document & chapter: Chapter 6: Likely Impacts of the Proposed Development	
Issue	Drainage changes Tables 6-1 and 6-2 do not identify the impact of change surface drainage. There is an impact in both tables called 'Drainage outfalls' but changes to surface water runoff, as the result of impermeable surfaces, earthworks and bunding measures etc are not described.
Impact	There could be implications for surface water management, if drainage changes on site are not identified as an impact.

Solution	The Applicant should update the construction and operation impacts to ensure they correctly identify the impact of change surface water runoff and drainage.

Document & chapter: Chapter 7: Mitigation	
Issue	Water quality monitoring Water quality monitoring pre-construction to establish a baseline and during construction is unknown. Whilst Table 7-1 says that there will be Monitoring which states that "Water quality will be regularly checked and sampled", this is only listed for Operation. There is no mention of an Operational Environmental Management Plan, so it is unclear how this will be secured.
Impact	If water quality monitoring is not appropriate then a suitable baseline of water quality data may not be captured, and any trends in water quality deterioration or improvement as a result of the project may not be understood.
Solution	A water quality monitoring plan should be provided when the Environmental Statement is produced. This should clarity locations, frequency, quantity and possible methods of monitoring. The Applicant should confirm how they intend to secure this existing monitoring commitment, as they currently do not have an Operational Environmental Management Plan or a Surface Water Management Plan.
Additional dialogue / commentary: Water quality monitoring should be conducted by the Applicant pre-construction, during construction and for the first few months of operation. It should occur at least monthly upstream and downstream of any water crossings or discharges. Methods of site walkovers for visual assessment, use of hand-held devices in-situ and samples sent to a laboratory should be confirmed.	

Document & chapter: Chapter 5: Baseline Conditions; and Chapter 12: Water Environment and Flood Risk	
Additional advice:	Clarity over watercourse names Section 5.5 describes the Baseline Conditions for the Water Environment and Flood Risk. In Tables 12-1 and 12-2, it mentions Ordinary Watercourses, however in section 5.5 only Hoggins Brook is named. The Applicant should clarify if there are other unnamed watercourses that they are aware of on or in proximity of the site.

4. Waste

4.1. Construction Phase

Whilst the volume of waste is not expected to be substantial during the construction stage, a precautionary approach should be adopted. All waste arising to be managed in accordance with the waste hierarchy, as required under the Waste (England and Wales) Regulations 2011 (as amended), prioritising prevention, reuse, recycling and recovery over disposal. In addition, all waste to be handled in compliance with the Duty of Care under the Environmental Protection Act 1990, ensuring that waste is stored, transported and transferred only to suitably authorised facilities.

Any off-site disposal or recovery of waste will be undertaken at appropriately permitted facilities in accordance with the Environmental Permitting (England and Wales) Regulations 2016. A Construction Environmental Management Plan (CEMP) should be implemented to embed these measures and ensure effective waste minimisation and management throughout the construction phase.

To reduce demand for new primary materials, the Proposed Development should adopt resource efficiency measures in line with the waste hierarchy principles set out in the Waste (England and Wales) Regulations 2011 (as amended) and the objectives of the UK Resources and Waste Strategy (2018). This will include the prioritisation of secondary and recycled materials, where practicable, and the optimisation of material use through design and construction practices.

Materials management and waste minimisation measures should be implemented through a Construction Environmental Management Plan (CEMP), which will set out procedures for the sustainable sourcing, use and management of materials.

4.2. Operational Phase

All waste will be managed in accordance with the waste hierarchy as defined in the Waste (England and Wales) Regulations 2011, with priority given to prevention, reuse, recycling and recovery over disposal. Waste management activities will comply with the Duty of Care requirements under the Environmental Protection Act 1990, including the use of appropriately licensed waste carriers and permitted waste management facilities in line with the Environmental Permitting (England and Wales) Regulations 2016.

Where hazardous wastes are generated, they will be classified, stored, transported and disposed of in accordance with the Hazardous Waste Regulations 2005 and relevant Environment Agency guidance. As a result, we expect only minimal quantities of waste will to be sent to landfill.

The use of raw materials and the generation of associated wastes will be managed in accordance with the waste hierarchy as defined in the Waste (England and Wales) Regulations 2011, with a focus on minimising resource consumption and waste generation through efficient material use and procurement practices. All wastes arising will be managed in compliance with the Duty of Care requirements under the Environmental Protection Act 1990, including appropriate storage, transfer and disposal via licensed waste carriers and permitted facilities in

accordance with the Environmental Permitting (England and Wales) Regulations 2016. Where applicable, hazardous materials and wastes will be handled in accordance with the Hazardous Waste Regulations 2005 and relevant Environment Agency guidance.

Any incidental waste arising during operation should be managed in accordance with the Environmental Protection Act 1990 (Duty of Care), the Waste (England and Wales) Regulations 2011 (waste hierarchy), and the Environmental Permitting (England and Wales) Regulations 2016, with hazardous wastes handled in line with the Hazardous Waste Regulations 2005 where applicable.

5. Environmental Permitting

The scoping report that an environmental permit will be required in line with the requirements of the Environmental Permitting (England & Wales) Regulations 2016. Additionally, certain elements may also fall under the Control of Major Accidents Hazard (COMAH) Regulations 2015 which would require a separate authorisation.

Permitting of complex industrial processes can take an extended period of time. To ensure the shortest possible determination period following submission of an application for the required authorisations, the applicant should seek the advice of the Environment Agency's National Permitting Service. Enhanced pre-application advice is a chargeable service. Details can be found at Get advice before you apply for an environmental permit - GOV.UK

If dewatering is required, it will require an abstraction licence if it doesn't meet the criteria for exemption in The Water Abstraction and Impounding (Exemptions) Regulations 2017 Section 5: Small scale dewatering in the course of building or engineering works. It may also require a discharge permit if it falls outside of our regulatory position statement for de-watering discharges.

If the applicant does not meet the exemption and requires a full abstraction licence, applicants should be aware that some aquifer units may be closed for new consumptive abstractions in this area. More information can be found on GOV.UK: Abstraction licensing strategies (CAMS process) and Apply for a water abstraction or impounding licence.

Please note that the typical timescale to process a licence application is 9-12 months. The applicant may wish to consider whether a scheme-wide dewatering application rather than individual applications would be beneficial. We suggest talking to our National Permitting Service early in the project planning.

Temporary dewatering of wholly or mainly rainwater that has accumulated in an excavation may be exempt from an Environmental Permit for a Water Discharge Activity. More information can be found on our website: Temporary dewatering from excavations to surface water: RPS 261. Note that this does not permit discharge of groundwater from a passive or active dewatering activity or permit the abstraction of groundwater.

The applicant may also need to consider discharge of groundwater, especially if it is contaminated. More information can be found on our website: Discharges to surface water and groundwater: environmental permits.

The use of drilling muds for the directional drilling may require a groundwater activity permit unless the 'de minimis' exemption applies. Early discussion about this is also recommended.

Brine discharge will be subject to a discharge permit. Guidance in relation to discharging and permits is available at the following links:

- Discharges to surface water and groundwater: environmental permits - GOV.UK
- Get advice before you apply for an environmental permit - GOV.UK

The applicant should consider that all negatively buoyant discharges need to undergo statistical modelling. Current guidance is that excess salinity should not exceed 40 ppt at a mixing zone boundary of 250m. Where sensitive species exist, excess salinity should be assessed based on species sensitivity. Further advice can be provided on engagement with the Environment Agency.

North West & West Midlands Area Office
Ghyll Mount
Gillan Way
Penrith 40 Business Park
Penrith
Cumbria
CA11 9BP

Tel: 0300 067 5103

nwwm@forestrycommission.gov.uk

Area Director
Keith Jones

Environmental Services, Infrastructure Decisions
& Applications Services
Planning Inspectorate
c/o QUADIENT
69 Buckingham Avenue
Slough
SL1 4PN

Ref: EN0310002

Date: 10 April 2026

Dear Sir/Madam

Salinae Hydrogen Storage Project

I refer to your letter of 13 March 2026.

There is no ancient woodland affected and consequently we have no comment to make on this occasion.

However, it is Government Policy to replace any trees lost through development and we trust therefore, the Planning Inspectorate will take this into account during their decision-making process.

Thank you for consulting the Forestry Commission.

Yours sincerely

[redacted]

Graham Simms
Area Admin Officer

Chemicals, Explosives and
Microbiological Hazards
Division – Unit 4

NSIP Consultations
Land Use Planning Team
Building 1.2,
Redgrave Court,
Bootle L20 7HS

NSIP.applications@hse.gov.uk

http://www.hse.gov.uk/

For the attention of: **John Rixham**
Environmental Services
Infrastructure Decisions and Applications Service
Planning Inspectorate
c/o QUADIENT 69 Buckingham Avenue
Slough
SL1 4PN

Date: 25th March 2026

References: CM9 Ref: 4.2.1.7455.
NSIP Ref: EN0310002

Dear John,

PROPOSED SALINAE HYDROGEN STORAGE PROJECT
THE INFRASTRUCTURE PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 2017 (as amended) REGULATIONS 10 and 11

Thank you for your email of **13th March 2026** regarding the information to be provided in an environmental statement relating to the above project. HSE does not comment on EIA Scoping Reports but the following information is likely to be useful to the applicant.

HSE's Land Use Planning Advice

CEMHD5 Contribution to Consultation

In relation to public safety risks arising from Major Hazard Installation(s) and/or Major Accident Hazard Pipeline(s) HSE applies two tests:

Test 1: Does the proposed development fall within HSE public safety consultation zones which arise from neighbouring Major Hazard Installation(s) and/or Major Accident Hazard Pipeline(s) which would present a risk to any population(s) directly associated with the proposed development?

Test 2: Will the proposed development, which intends in its own right to handle/store hazardous/dangerous substances, impose major hazard risk(s) to surrounding population(s)? A new or modified Major Hazard Installation(s) (the proposed development) requiring hazardous substances consent(s) and/or associated Major Accident Hazard Pipeline(s) may present a major hazard risk to neighbouring population(s).

Test 1: Will the proposed development fall within any of HSE's consultation distances associated with any neighbouring Major Hazard Installation(s) and/or Major Accident Hazard Pipeline(s)?

1. With reference to the proposed redlined ***Site Boundary*** shown on **Figure 1.1 Site Boundary** found in **https://national-infrastructure-consenting.planninginspectorate.gov.uk/projects/EN0310002/documents**.

2. **Reference: Scoping Report - Submitted to the Secretary of State on 03 March 2026]** the proposed project falls within the consultation distances of several Major Hazard Installation(s) and Major Accident Hazard Pipeline(s).

3. There is currently insufficient information available for HSE to provide its' public safety Land Use Planning Advice (major hazards risks imposed by neighbouring Major Hazard Installation(s) and/or associated Major Accident Hazard Pipeline(s)). However, by way of general guidance HSE would not advise against the proposed development providing no population(s), either temporary or permanent, is introduced within any of HSE's public safety zones nor would HSE advise against Workplaces (DT1.1 - Workplaces)*, providing for less than 100 occupants in each building and less than 3 occupied storeys.

* HSE's Land Use Planning Methodology Table 1 Development type: People at work, Parking
https://www.hse.gov.uk/landuseplanning/methodology.htm

4. Please note if at any time a new Major Accident Hazard Pipeline is introduced or existing Pipeline modified prior to the determination of a future application, then the HSE reserves the right to revise its advice.

5. Likewise, if prior to the determination of a future application, a Hazardous Substances Consent is granted for a new Major Hazard Installation or a Hazardous Substances Consent is varied for an existing Major Hazard Installation in the vicinity of the proposed development, again the HSE reserves the right to revise its advice.

Test 2: Does the proposed development, which intends in its own right to handle/store hazardous/dangerous substances, require hazardous substances consent(s)?

6. The presence of hazardous substances on, over or under land at or above set threshold quantities (Controlled Quantities) may require Hazardous Substances Consent (HSC) under the Planning (Hazardous Substances) Act 1990 as amended. The substances, alone or when aggregated with others, for which HSC is required, and the associated Controlled Quantities, are set out in The Planning (Hazardous Substances) Regulations 2015.

7. Hazardous Substances Consent would be required if the proposed development site is intending to store or use any of the Named Hazardous Substances or Categories of Substances and Preparations at or above the controlled quantities set out in schedule 1 of these Regulations.

8. The scale of the proposed hydrogen storage activities [**Paragraph 1.1.9, 1.1. Background, Scoping Report - submitted to the Secretary of State on 29 April 2025**] indicates that

hazardous substances consent will be required. Section **21. Major Accidents and Disasters [Scoping Report - Appendix B Policy and Legislation]**, identifies Cheshire East Council as the Hazardous Substances Authority (HSA) which is responsible for determining hazardous substances consent applications, with the Health and Safety Executive (HSE) acting as a statutory consultee.

9. The hazardous substances consent application process can take in excess of six months to complete and may take considerably longer, depending on the complexity of the technical assessments required and the associated decision-making procedures. It should be noted that, depending on a range of factors, HSE may advise against the granting of hazardous substances consent. HSE therefore encourages the developer to submit an application to Cheshire East Council at the earliest opportunity.

10. Until this matter has been progressed, HSE is unable to provide public safety Land Use Planning Advice in relation to major hazards arising from hazardous substances consent(s) associated with the proposed development (public safety major hazards risks imposed by the proposed development on neighbouring populations).

Explosives sites

Explosives Inspectorate has no comment to make as there are no HSE licenced explosives sites in the vicinity of the proposed development.

Electrical safety

No comment from a planning perspective

At this time, please send any further communication on this project directly to the HSE's designated e-mail account for NSIP applications at nsip.applications@hse.gov.uk. We are currently unable to accept hard copies, as our offices have limited access.

Yours faithfully,

CEMHD4
NSIP Consultation Team

From: [redacted]
To: Salinae Hydrogen Storage
Subject: SMDC ref CON/2026/0030 RE: EN0310002 Salinae Hydrogen Storage Project EIA Notification
Date: 01 April 2026 10:48:50
Attachments: ~WRD0000.jpg
image006.png
image007.png
image008.png
image009.png
image010.png
image011.png
image012.png

Dear Mr Jones
Thank you for consulting with the Head of Planning.

I have been asked to provide a response. At the present time I have no indication of anything that would need to be raised with you on behalf of this Planning Authority.

I note that the consultation is needed as we are a neighbouring authority to Cheshire East Borough Council. I also note that the site at Warmingham is in the order of some 15km from the Staffordshire Moorlands boundary at its closest point.

Yours sincerely,
Arne Swithenbank

Arne D. Swithenbank Planning Officer
Development Services
High Peak Borough Council and Staffordshire Moorlands District Council
Mob: **0**[redacted]
www.highpeak.gov.uk | Follow HPBC on X (Formerly Twitter) | Facebook
www.staffsmoorlands.gov.uk | Follow SMDC on X (Formerly Twitter) | Facebook

---

From: Salinae Hydrogen Storage <salinaehydrogenstorage@planninginspectorate.gov.uk>
Sent: 13 March 2026 10:05
Subject: EN0310002 Salinae Hydrogen Storage Project EIA Notification

FAO Head of Planning

Dear Sir/Madam

Please see attached correspondence on the proposed Salinae Hydrogen Storage Project.

The Applicant for the Proposed Development intends to make an application for

Development Consent under the Planning Act 2008. The Applicant has sought a Scoping Opinion from the Planning Inspectorate, on behalf of the Secretary of State, as to the scope and level of detail of the information to be provided within the Environmental Statement that will accompany its future application.

The Planning Inspectorate has identified you as a consultation body to inform the Scoping Opinion and is therefore inviting you to submit comments by **10 April 2026**. The deadline is a statutory requirement that cannot be extended.

Further information is included within the attached letter.

Kind regards,

Joseph Jones

Joseph Jones
Environmental Advisor
The Planning Inspectorate

DPC:76616c646f72

Salinae Hydrogen Storage Project

Scoping Report Consultation Response

PINS Ref. EN0310002

Our Ref. PL00800163

9 April 2026

Historic England consider the Salinae Hydrogen Storage Project Scoping Report (Uniper UK Ltd, March 2026) to be generally acceptable with regard to the assessment of potential impacts to the historic environment, and in accordance with industry best practice. The baseline correctly identifies the relevant heritage assets within the proposed 1km study area, and Historic England agree with the elements identified to be scoped in or out of the assessment. However, we do have the following comments to make:

Scoping Report

Table 6-2 lists various potential impacts that may occur during the Operational Phase of the proposed development, including that to 'amenity'. This is correctly liked to the Historic Environment as a relevant topic. However, given that the proposed development is anticipated to operate for 40 years (until 2073), we question whether this can be classed as a temporary impact. We do accept that these impacts are reversable following the decommissioning of the proposed development.

Scoping Report – Appendix A Figures

The legend on Figure 5-1 (Environmental Constraints) lists Grade II and Grade II* listed buildings, whilst the legend on Figure 5-3 (Designated Heritage Assets) lists Grade II* and Grade I listed buildings. I presume that the error is in the legend on Figure 5-3 as there do not appear to be any Grade II listed buildings within the 1km study area.

Scoping Report – Appendix C Methodologies

Paragraph 11.2.3 states that the methodology for assessment of value is based on the guidance provided in LA104 and LA106 of the Design Manual for Road and Bridges (DMRB). Table 3.2N in LA104 of DMRB lists value (sensitivity) of receptors from 'Very High' to 'Negligible' against a 'Typical description' of a receptor in that category. For the 'High' category of receptor value, the typical description states 'High importance and rarity, national scale, and limited potential for substitution'. Listed buildings and Registered Parks and Gardens of all grades are nationally significant (i.e. of a 'national scale'). As such, Grade II listed buildings and Grade II Registered Parks and Gardens should be placed within the 'High' value category of Table 11-1.

Pete Owen

Development Advice Team Leader, North West England

From: box.assetprotection
To: Salinae Hydrogen Storage
Subject: RE: EN0310002 Salinae Hydrogen Storage Project EIA Notification
Date: 16 March 2026 09:21:26
Attachments: image006.png
image007.png
image008.png
image009.png
image010.png
image011.png
MOD National Gas Transmission 40811322.pdf

Good Morning,

Thank you for your email.

Regarding planning application at site location EN0310002 there are National Gas assets affected in this area.

We have raised an enquiry for National Gas purposes only on your behalf and a Moderate Response letter has been generated and attached for your review.

An assessment has been carried out with respect to National Gas Transmission plc's apparatus and the proposed work location. Based on the location entered into the system for assessment the area has been found to be outside the High Risk zone from National Gas Transmission plc's apparatus and can proceed. Should the work area change or type of activity being undertaken, a new enquiry shall be submitted for assessment.

If you would like to view if there are any other affected assets in this area, please raise an enquiry with www.lsbud.co.uk. Additionally, if the location or works type changes, please raise an enquiry.

Kind regards

Jordane Maples
Asset Protection Assistant
Asset Protection

[redacted]@nationalgas.com

National Gas Transmission, Warwick Technology Park, Gallows Hill, Warwick, CV34 6DA
nationalgas.com | **Twitter** | **LinkedIn**

Please consider the environment before printing this email.

From: Salinae Hydrogen Storage <salinaehydrogenstorage@planninginspectorate.gov.uk>
Sent: 13 March 2026 09:50
Subject: EN0310002 Salinae Hydrogen Storage Project EIA Notification

Dear Sir/Madam

Please see attached correspondence on the proposed Salinae Hydrogen Storage Project.

The Applicant for the Proposed Development intends to make an application for Development Consent under the Planning Act 2008. The Applicant has sought a Scoping Opinion from the Planning Inspectorate, on behalf of the Secretary of State, as to the scope and level of detail of the information to be provided within the Environmental Statement that will accompany its future application.

The Planning Inspectorate has identified you as a consultation body to inform the Scoping Opinion and is therefore inviting you to submit comments by **10 April 2026**. The deadline is a statutory requirement that cannot be extended.

Further information is included within the attached letter.

Kind regards,

Joseph Jones

Joseph Jones
Environmental Advisor
The Planning Inspectorate

@PINSgov The Planning Inspectorate planninginspectorate.gov.uk

Ensuring **fairness**, **openness** and **impartiality** across all our services

necessary checks.

The statements expressed in this e-mail are personal and do not necessarily reflect the opinions or policies of the Inspectorate.

DPC:76616c646f72

National Grid House
Warwick Technology Park
Gallows Hill, Warwick
CV34 6DA

Tiffany Bate
Lead Development Liaison Officer
[redacted]@nationalgrid.com
[redacted]

Rachel Hagan
Development Liaison Support Officer
[redacted]@nationalgrid.com
[redacted]

Customer Connections Site Solutions (CCSS)
Land, Planning and External Affairs (LPEA)
National Grid Electricity Transmission (NGET)
www.nationalgrid.com

SUBMITTED ELECTRONICALLY:
salinaehydrogenstorage@planninginspectorate.gov.uk

09 April 2026

Dear Sir/Madam

RE: APPLICATION BY Uniper (THE APPLICANT) FOR AN ORDER GRANTING DEVELOPMENT CONSENT FOR THE Salinae Hydrogen Storage Project (THE PROPOSED DEVELOPMENT)

SCOPING CONSULTATION RESPONSE

We refer to your letter dated 13th March 2026 regarding the above Proposed Development.

This is a response on behalf of National Grid Electricity Transmission PLC (NGET).

NGET has no existing apparatus within or in close proximity to the proposed site boundary but would like to be kept informed as the proposal progresses.

We enclose a plan showing our nearest infrastructure.

If you require any further information, please do not hesitate to contact the Land Development Liaison team.

Yours faithfully,

[redacted]

Tiffany Bate
Lead Development Liaison Officer
Customer Connections Site Solutions (CCSS)
Land, Planning and External Affairs (LPEA)

[redacted]

Rachel Hagan
Development Liaison Support Officer
Customer Connections Site Solutions (CCSS)
Land, Planning and External Affairs (LPEA)

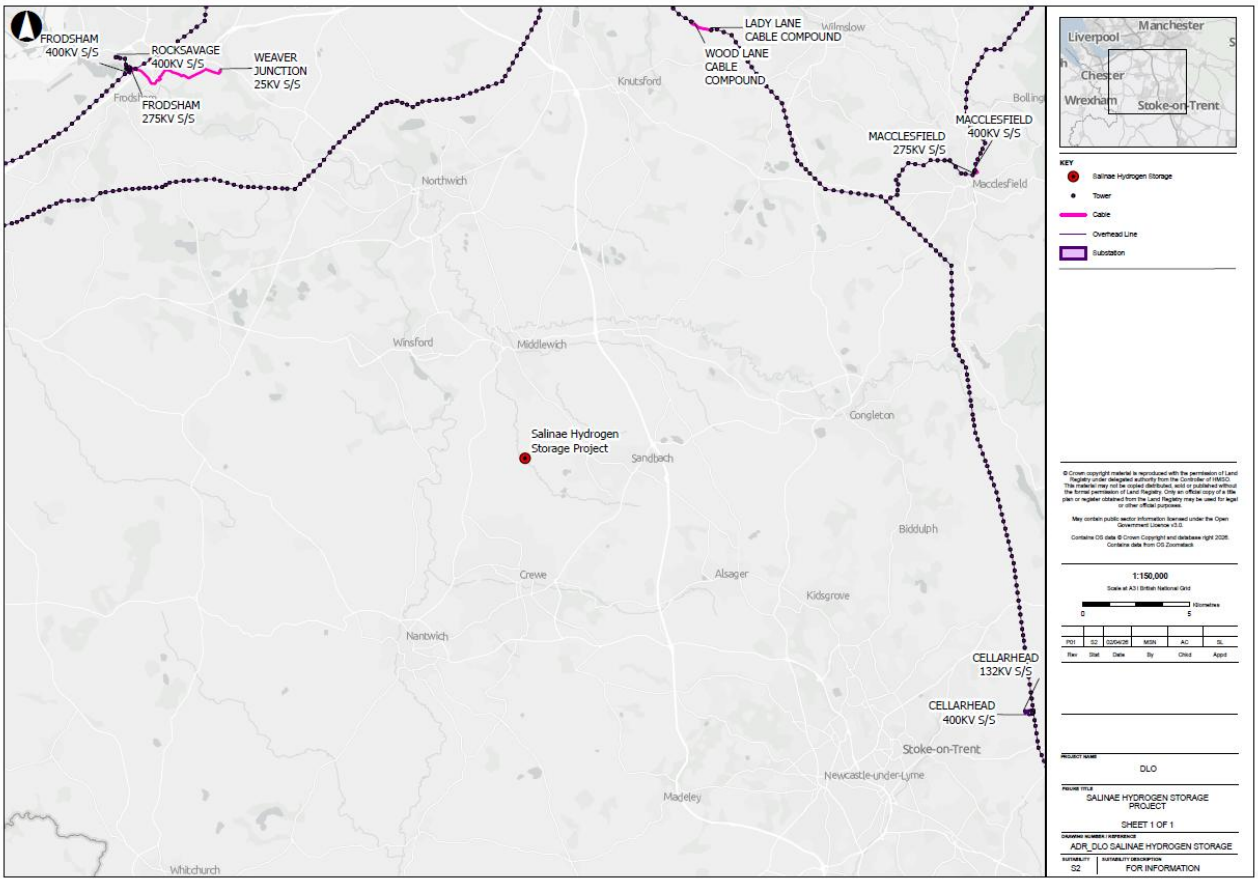
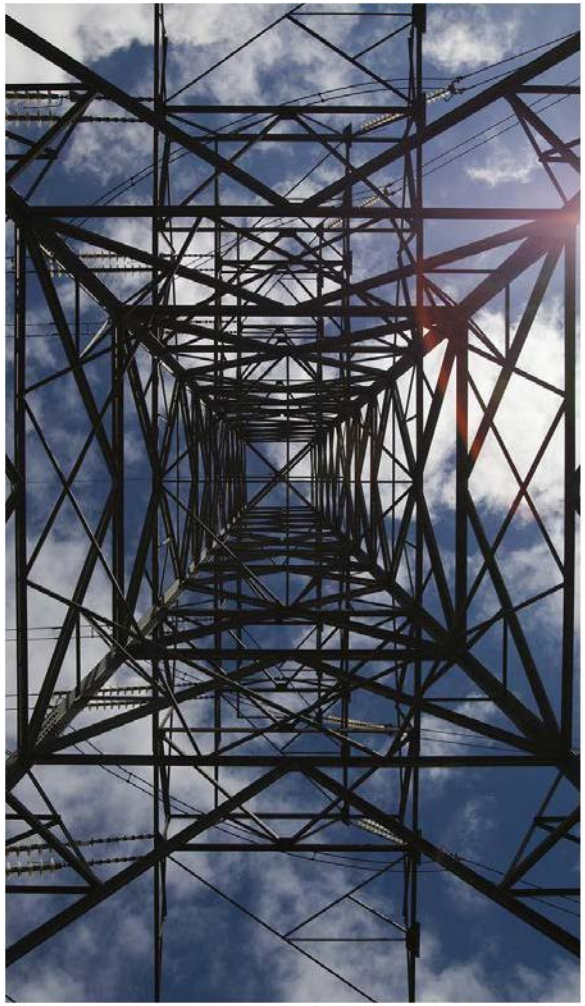


Figure 1: NGET Assets Near to Proposed Development Area

Technical Guidance Note 287

Third-party guidance for working near National Grid Electricity Transmission equipment



Purpose and scope

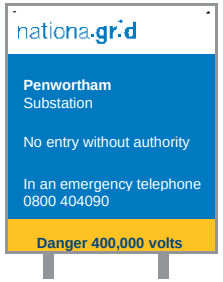
The purpose of this document is to give guidance and information to third parties who are proposing, scheduling or designing developments close to National Grid Electricity Transmission assets.

The scope of the report covers information on basic safety and the location of our assets – and also highlights key issues around particular types of development and risk areas.

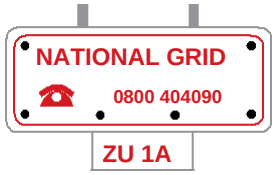
In the case of electrical assets, National Grid does not authorise or agree safe systems of work with developers and contractors. However, we will advise on issues such as electrical safety clearances and the location of towers and cables. We also work with developers to minimise the impact of any National Grid assets that are nearby.

How to identify specific National Grid sites

Substations
The name of the Substation and emergency contact number will be on the site sign.



Overhead Lines
The reference number of the tower and the emergency contact number will be on this type of sign.



Contact National Grid

Plant protection

For routine enquiries regarding planned or scheduled works, contact the Asset Protection team online, by email or phone.

www.lsbud.co.uk

Email: assetprotection@nationalgrid.com

Phone: 0800 001 4282

Emergencies

In the event of occurrences such as a cable strike, coming into contact with an overhead line conductor or identifying any hazards or problems with National Grid's equipment, phone our emergency number 0800 404 090 (option 1).

If you have apparatus within 30m of a National Grid asset, please ensure that the emergency number is included in your site's emergency procedures.

Consider safety

Consider the hazards identified in this document when working near electrical equipment

Part 1

Electricity transmission infrastructure

National Grid owns and maintains the high-voltage electricity transmission network in England and Wales (Scotland has its own networks). It's responsible for balancing supply with demand on a minute-by-minute basis across the network.

Overhead lines

Overhead lines consist of two main parts – pylons (also called towers) and conductors (or wires). Pylons are typically steel lattice structures mounted on concrete foundations. A pylon's design can vary due to factors such as voltage, conductor type and the strength of structure required.

Conductors, which are the 'live' part of the overhead line, hang from pylons on insulators. Conductors come in several different designs depending on the amount of power that is transmitted on the circuit.

In addition to the two main components, some Overhead Line Routes carry a Fibre Optic cable between the towers with an final underground connection to the Substations.

In most cases, National Grid's overhead lines operate at 275kV or 400kV.

Underground cables

Underground cables are a growing feature of National Grid's network. They consist of a conducting core surrounded by layers of insulation and armour. Cables can be laid in the road, across open land or in tunnels. They operate at a range of voltages, up to 400kV.

Substations

Substations are found at points on the network where circuits come together or where a rise or fall in voltage is required. Transmission substations tend to be large facilities containing equipment such as power transformers, circuit breakers, reactors and capacitors. In addition Diesel generators and compressed air systems can be located there.

Part 2

Statutory requirements for working near high-voltage electricity

The legal framework that regulates electrical safety in the UK is *The Electricity Safety, Quality and Continuity Regulations (ESQCR) 2002*. This also details the minimum electrical safety clearances, which are used as a basis for the Energy Networks Association (ENA) TS 43-8. These standards have been agreed by CENELEC (European Committee for Electrotechnical Standardisation) and also form part of the *British Standard BS EN 50341-1:2012 Overhead Electrical Lines exceeding AC 1kV*. All electricity companies are bound by these rules, standards and technical specifications. They are required to uphold them by their operator's licence.

Electrical safety clearances

It is essential that a safe distance is kept between the exposed conductors and people and objects when working near National Grid's electrical assets. A person does not have to touch an exposed conductor to get a life-threatening electric shock. At the voltages National Grid operates at, it is possible for electricity to jump up to several metres from an exposed conductor and kill or cause serious injury to anyone who is nearby. For this reason, there are several legal requirements and safety standards that must be met.

Any breach of legal safety clearances will be enforced in the courts. This can and has resulted in the removal of an infringement, which is normally at the cost of the developer or whoever caused it to be there. Breaching safety clearances, even temporarily, risks a serious incident that could cause serious injury or death.

National Grid will, on request, advise planning authorities, developers or third parties on any safety clearances and associated issues. We can supply detailed drawings of all our overhead line assets marked up with relevant safe areas.

« Section continued from previous page

Your Responsibilities - Overhead lines

Work which takes place near overhead power lines carries a significant risk of coming into proximity with the wires. If any person, object or material gets too close to the wires, electricity could ‘flashover’ and be conducted to earth, causing death or serious injury. You do not need to touch the wires for this to happen. The law requires that work is carried out in close proximity to live overhead power lines only when there is no alternative, and only when the risks are acceptable and can be properly controlled. Statutory clearances exist which must be maintained, as prescribed by the Electricity Safety, Quality and Continuity Regulations 2002.

Under the Health and Safety at Work etc. Act 1974 and Management of Health and Safety at Work Regulations 1999, you are responsible for preparing a suitable and sufficient risk assessment and safe systems of work, to ensure that risks are managed properly and the safety of your workforce and others is maintained. Your risk assessment must consider and manage all of the significant risks and put in place suitable precautions/controls in order to manage the work safely. You are also responsible for ensuring that the precautions identified are properly implemented and stay in place throughout the work.

Work near overhead power lines must always be conducted in accordance with GS6, ‘avoiding danger from overhead power lines’, and any legislation which is relevant to the work you are completing.

.

What National Grid will provide

National Grid can supply profile drawings in PDF and CAD format showing tower locations and relevant clearances to assist you in the risk assessment process.

What National Grid will not provide

National Grid will not approve safe systems of work or approve design proposals

Part 3

What National Grid will do for you and your development

Provision of information

National Grid should be notified during the planning stage of any works or developments taking place near our electrical assets, ideally a minimum notification period of 8 weeks to allow National Grid to provide the following services:

Drawings

National Grid will provide relevant drawings of overhead lines or underground cables to make sure the presence and location of our services are known. Once a third party or developer has contacted us, we will supply the drawings for free.

400kV

The maximum nominal voltage of the underground cables in National Grid's network

Risk or impact identification

National Grid can help identify any hazards or risks that the presence of our assets might bring to any works or developments. This includes both the risk to safety from high-voltage electricity and longer-term issues, such as induced currents, noise and maintenance access that may affect the outcome of the development. National Grid will not authorise specific working procedures, but we can provide advice on best practice.

Risks or hazards to be aware of

This section includes a brief description of some of the hazards and issues that a third party or developer might face when working or developing close to our electrical infrastructure.

Land and access

National Grid has land rights in place with landowners and occupiers, which cover our existing overhead lines and underground cable network. These agreements, together with legislation set out under the *Electricity Act 1989*, allow us to access our assets to maintain, repair and renew them. The agreements also lay down restrictions and covenants to protect the integrity of our assets and meet safety regulations. Anyone proposing a development close to our assets should carefully examine these agreements.

Our agreements often affect land both inside and outside the immediate vicinity of an asset. Rights will include the provision of access, along with restrictions that ban the development of land through building, changing levels, planting and other operations. Anyone looking to develop close to our assets must consult with National Grid first.

For further information, contact Asset Protection:

Email: assetprotection@nationalgrid.com
Phone: 0800 001 4282

Electrical clearance from overhead lines

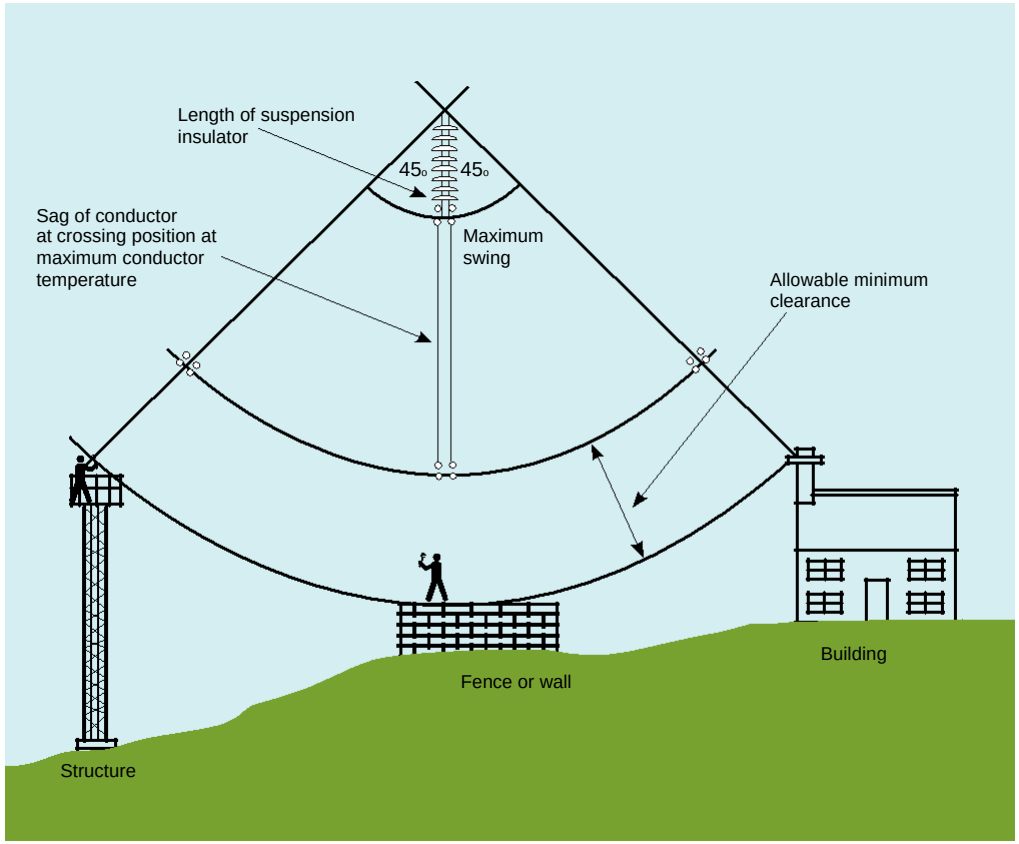
The clearance distances referred to in this section are specific to 400kV overhead lines. National Grid can advise on the distances required around different voltages i.e. 132kV and 275kV.

As we explained earlier, *Electrical Networks Association TS 43-8* details the legal clearances to our overhead lines. The minimum clearance between the conductors of an overhead line and the ground is 7.3m at maximum sag. The sag is the vertical distance between the wire's highest and lowest point. Certain conditions, such as power flow, wind speed and air temperature can cause conductors to move and allowances should be made for this.

The required clearance from the point where a person can stand to the conductors is 5.3m. To be clear, this means there should be at least 5.3m from where someone could stand on any structure (i.e. mobile and construction equipment) to the conductors. Available clearances will be assessed by National Grid on an individual basis.

National Grid expects third parties to implement a safe system of work whenever they are near Overhead Lines.

Diagram not to scale



There should be at least 5.3m between the conductors and any structure someone could stand on

We recommend that guidance such as *HSE Guidance Note GS6 (Avoiding Danger from Overhead Power Lines)* is followed, which provides advice on how to avoid danger from all overhead lines, at all voltages. If you are carrying out work near overhead lines you must contact National Grid, who will provide the relevant profile drawings.

7.3m

The required minimum clearance between the conductors of an overhead line, at maximum sag, and the ground

Section continues on next page »

The undergrounding of electricity cables at Ross-on-Wye

« Section continued from previous page

Underground cables Underground cables operating at up to 400kV are a significant part of the National Grid Electricity Transmission network. When your works will involve any ground disturbance it is expected that a safe system of work is put in place and that you follow guidance such as *HSG 47 (Avoiding Danger from Underground Services)*.

You must contact National Grid to find out if there are any underground cables near your proposed works. If there are, we will provide cable profiles and location drawings and, if required, on-site supervision of the works. Cables can be laid under roads or across industrial or agricultural land. They can even be layed in canal towpaths and other areas that you would not expect.

Cables crossing any National Grid high-voltage (HV) cables directly buried in the ground are required to maintain a minimum seperation that will be determined by National Grid on a case-by-case basis. National Grid will need to do a rating study on the existing cable to work out if there are any adverse effects on either cable rating. We will only allow a cable to cross such an area once we know the results of the re-rating. As a result, the clearance distance may need to be increased or alternative methods of crossing found.

For other cables and services crossing the path of our HV cables, National Grid will need confirmation that published standards and clearances are met.

Impressed voltage

Any conducting materials installed near high-voltage equipment could be raised to an elevated voltage compared to the local earth, even when there is no direct contact with the high-voltage equipment. These impressed voltages are caused by inductive or capacitive coupling between the high-voltage equipment and nearby conducting materials and can occur at distances of several metres away from the equipment. Impressed voltages may damage your equipment and could potentially injure people and animals, depending on their severity. Third parties should take impressed voltages into account during the early stages and initial design of any development, ensuring that all structures and equipment are adequately earthed at all times.

Section continues on next page »

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Earth potential rise

Under certain system fault conditions – and during lightning storms – a rise in the earth potential from the base of an overhead line tower or substation is possible. This is a rare phenomenon that occurs when large amounts of electricity enter the earth. This can pose a serious hazard to people or equipment that are close by.

We advise that developments and works are not carried out close to our tower bases, particularly during lightning storms.

Noise

Noise is a by-product of National Grid's operations and is carefully assessed during the planning and construction of any of our equipment. Developers should consider the noise emitted from National Grid's sites or overhead lines when planning any developments, particularly housing. Low-frequency hum from substations can, in some circumstances, be heard up to 1km or more from the site, so it is essential that developers find adequate solutions for this in their design. Further information about likely noise levels can be provided by National Grid.

Maintenance access

National Grid needs to have safe access for vehicles around its assets and work that restricts this will not be allowed.
In terms of our overhead lines, we wouldn't want to see any excavations made, or permanent structures built, that might affect the foundations of our towers. The size of the foundations around a tower base depends on the type of tower that is built there. If you wish to carry out works within 30m of the tower base, contact National Grid for more information. Our business has to maintain access routes to tower bases with land owners. For that reason, a route wide enough for an HGV must be permanently available. We may need to access our sites, towers, conductors and underground cables at short notice.

30m

If you wish to carry out work within this distance of the tower base, you must contact National Grid for more information

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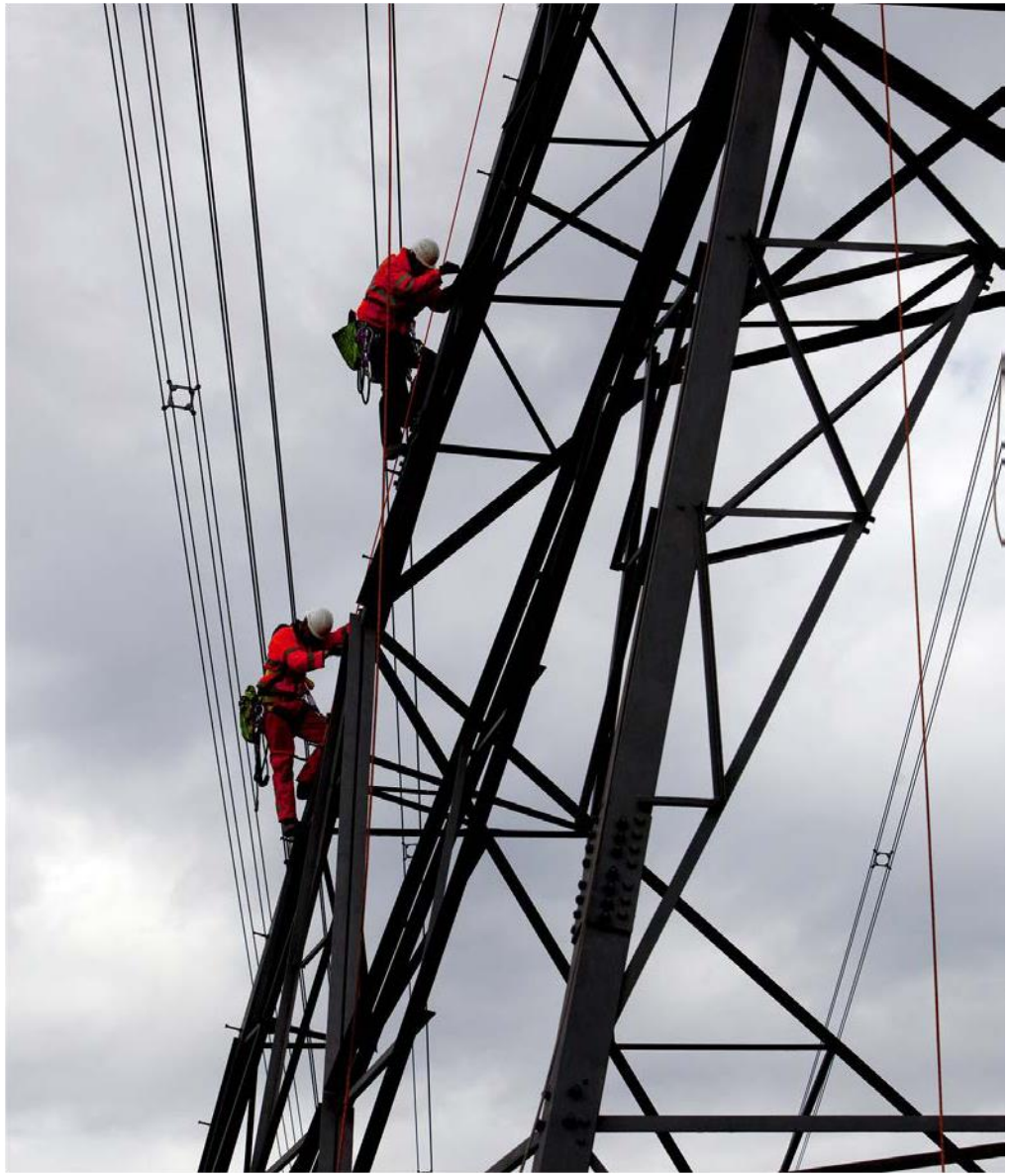

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Fires and firefighting

National Grid does not recommend that any type of flammable material is stored under overhead lines. Developers should be aware that in certain cases the local fire authority will not use water hoses to put out a fire if there are live, high-voltage conductors within 30m of the seat of the fire *(as outlined in ENA TS 43-8)*.

In these situations, National Grid would have to be notified and reconfigure the system – to allow staff to switch out the overhead line – before any firefighting could take place. This could take several hours.

We recommend that any site which has a specific hazard relating to fire or flammable material should include National Grid's emergency contact details (found at the beginning and end of this document) in its fire plan information, so any incidents can be reported.

Developers should also make sure their insurance cover takes into account the challenge of putting out fires near our overhead lines.

Excavations, piling or tunnelling

You must inform National Grid of any works that have the potential to disturb the foundations of our substations or overhead line towers. This will have to be assessed by National Grid engineers before any work begins.

BS ISO 4866:2010 states that a minimum distance of 200m should be maintained when carrying out quarry blasting near our assets. However, this can be reduced with specific site surveys and changes to the maximum instantaneous charge (the amount of explosive detonated at a particular time).

All activities should observe guidance layed out in *BS 5228-2:2009*.

Microshocks

High-voltage overhead power lines produce an electric field. Any person or object inside this field that isn't earthed picks up an electrical charge. When two conducting objects – one that is grounded and one that isn't – touch, the charge can equalise and cause a small shock, known as a microshock. While they are not harmful, they can be disturbing for the person or animal that suffers the shock.

For these reasons, metal-framed and metal-clad buildings which are close to existing overhead lines should be earthed to minimise the risk of microshocks. Anything that isn't earthed, is conductive and sits close to the lines is likely to pick up a charge. Items such as deer fences, metal palisade fencing, chain-link fences and metal gates underneath overhead lines all need to be earthed.

For further information on microshocks please visit **www.emfs.info.**

200m

The minimum distance that should be maintained from National Grid assets when quarry blasting

Specific development guidance

Wind farms

National Grid's policy towards wind farm development is closely connected to the *Electricity Networks Association Engineering Recommendation L44 Separation between Wind Turbines and Overhead Lines, Principles of Good Practice.* The advice is based on national guidelines and global research. It may be adjusted to suit specific local applications.

There are two main criteria in the document:

(i) The turbine shall be far enough away to avoid the possibility of toppling onto the overhead line

(ii) The turbine shall be far enough away to avoid damage to the overhead line from downward wake effects, also known as turbulence

The toppling distance is the minimum horizontal distance between the worst-case pivot point of the wind turbine and the conductors hanging in still air. It is the greater of:

- the tip height of the turbine plus 10%
- or, the tip height of the turbine plus the electrical safety distance that applies to the voltage of the overhead line.

To minimise the downward wake effect on an overhead line, the wind turbine should be three times the rotor distance away from the centre of the overhead line.

Wake effects can prematurely age conductors and fittings, significantly reducing the life of the asset. For that reason, careful consideration should be taken if a wind turbine needs to be sited within the above limits. Agreement from National Grid will be required.

Commercial and housing developments

National Grid has developed a document called *Design guidelines for development near pylons and HVO power lines*, which gives advice to anyone involved in planning or designing large-scale developments that are crossed by, or close to, overhead lines.

The document focuses on existing 275kV and 400kV overhead lines on steel lattice towers, but can equally apply to 132kV and below. The document explains how to design large-scale developments close to high-voltage lines, while respecting clearances and the development's visual and environmental impact.

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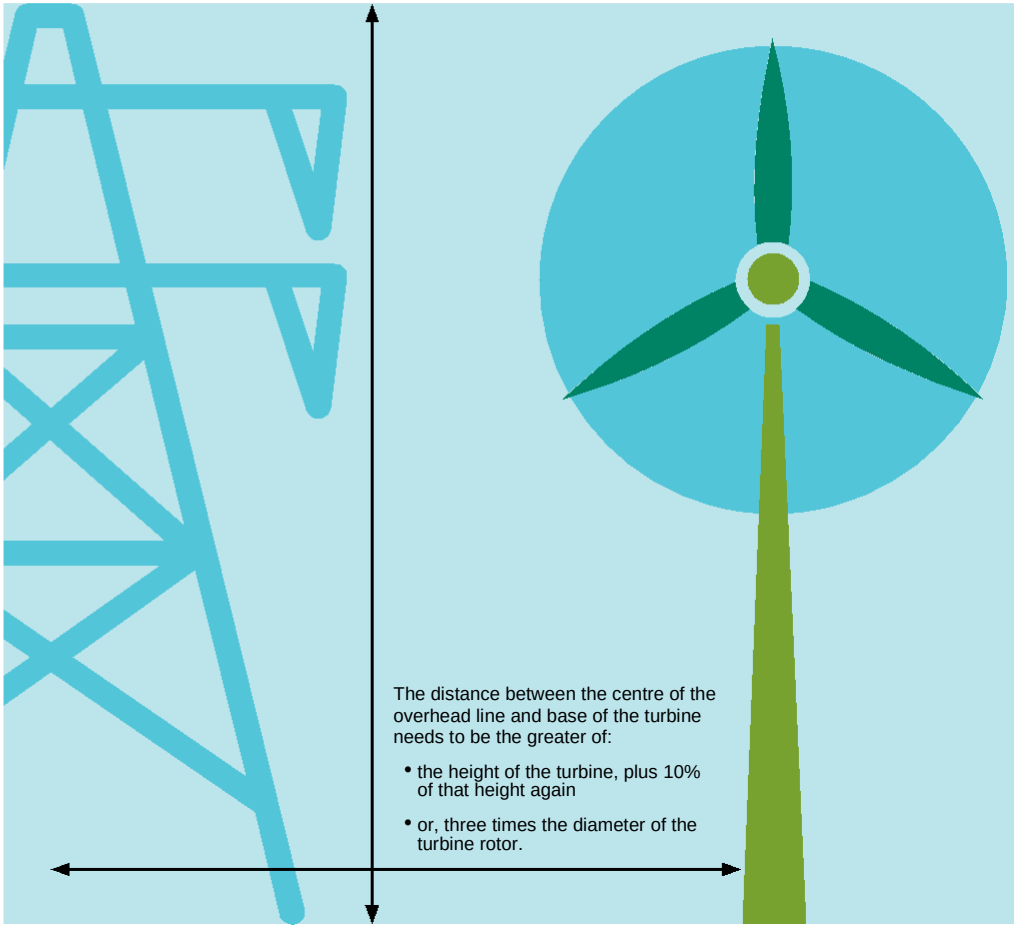
Diagram not to scale



Turbines should be far enough away to avoid the possibility of toppling onto the overhead line

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The advice is intended for developers, designers, landowners, local authorities and communities, but is not limited to those organisations.

Overall, developers should be aware of all the hazards and issues relating to the electrical equipment that we have discussed when designing new housing.

As we explored earlier, National Grid's assets have the potential to create noise. This can be low frequency and tonal, which makes it quite noticeable. It is the responsibility of developers to take this into account during the design stage and find an appropriate solution.

Solar farms

While there is limited research and recommendations available, there are several key factors to consider when designing Solar Farms in the vicinity of Overhead Power Lines.

Developers may be looking to build on arable land close to National Grid's assets. In keeping with the safety clearance limits that we outlined earlier for solar panels directly underneath overhead line conductors, the highest point on the solar panels must be no more than 5.3m from the lowest conductors.

This means that the maximum height of any structure will need to be determined to make sure safety clearance limits aren't breached. This could be as low as 2m. National Grid will supply profile drawings to aid the planning of solar farms and determine the maximum height of panels and equipment.

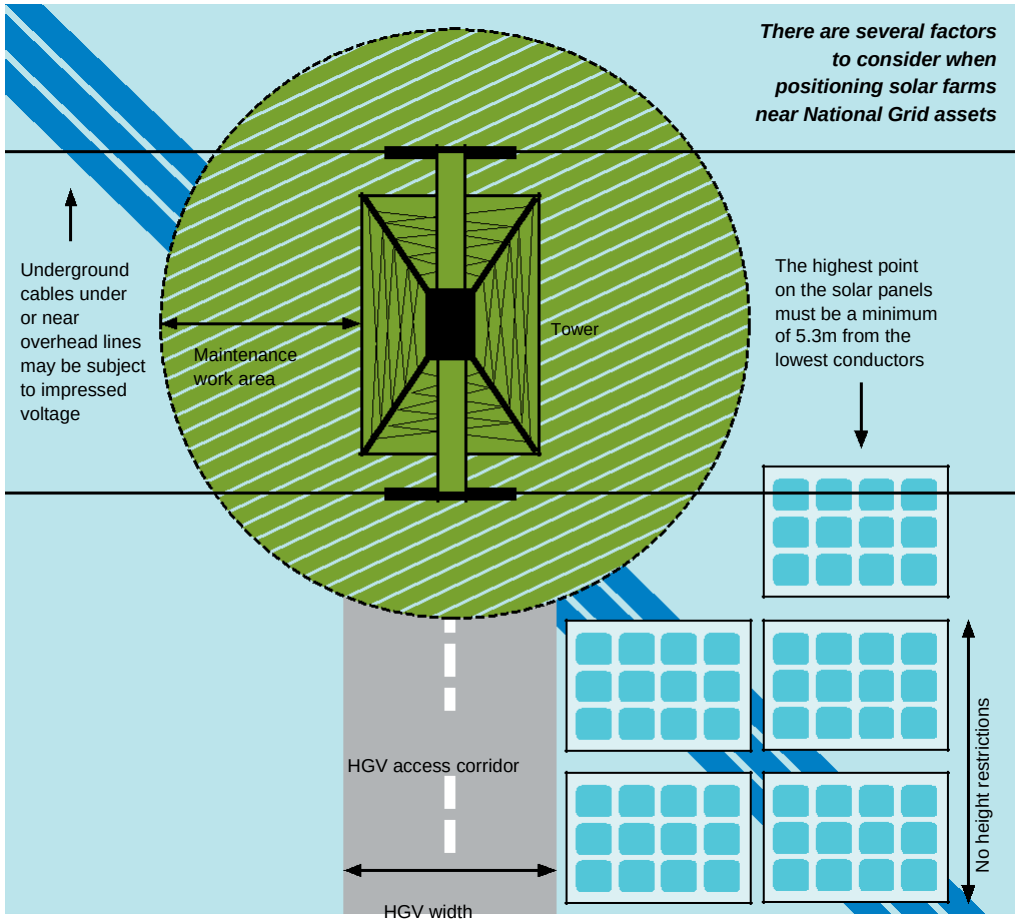
Solar panels that are directly underneath power lines risk being damaged on the rare occasion that a conductor or fitting falls to the ground. A more likely risk is ice falling from conductors or towers in winter and damaging solar panels.

There is also a risk of damage during adverse weather conditions, such as lightning storms, and system faults. As all our towers are earthed, a weather event such as lightning can cause a rise in the earth potential around the base of a tower. Solar panel support structures and supply cables should be adequately earthed and bonded together to minimise the effects of this temporary rise in earth potential.

Any metallic fencing that is located under an overhead line will pick up an electrical charge. For this reason, it will need to be adequately earthed to minimise microshocks to the public.

For normal, routine maintenance and in an emergency National Grid requires unrestricted access to its assets. So if a tower is enclosed in a solar farm compound, we will need full access for our vehicles, including access through any compound gates. During maintenance – and especially re-conductoring – National Grid would need enough space near our towers for winches and cable drums. If enough space is not available, we would require solar panels to be temporarily removed.

Diagram not to scale



Asset protection agreements

In some cases, where there is a risk that development will impact on National Grid's assets, we will insist on an asset protection agreement being put in place. The cost of this will be the responsibility of the developer or third party.

Contact details

Emergency situations

If you spot a potential hazard on or near an overhead electricity line, do not approach it, even at ground level. Keep as far away as possible and follow the six steps below:

- Warn anyone close by to evacuate the area
- Call our 24-hour electricity emergency number: 0800 404 090 (Option 1)[1]
- Give your name and contact phone number
- Explain the nature of the issue or hazard
- Give as much information as possible so we can identify the location – i.e. the name of the town or village, numbers of nearby roads, postcode and (ONLY if it can be observed without putting you or others in danger) the tower number of an adjacent pylon
- Await further contact from a National Grid engineer

[1] It is critically important that you don't use this phone number for any other purpose. If you need to contact National Grid for another reason please use our Contact Centre at www2.nationalgrid.com/contact-us to find the appropriate information or call 0800 0014282.

Routine enquiries

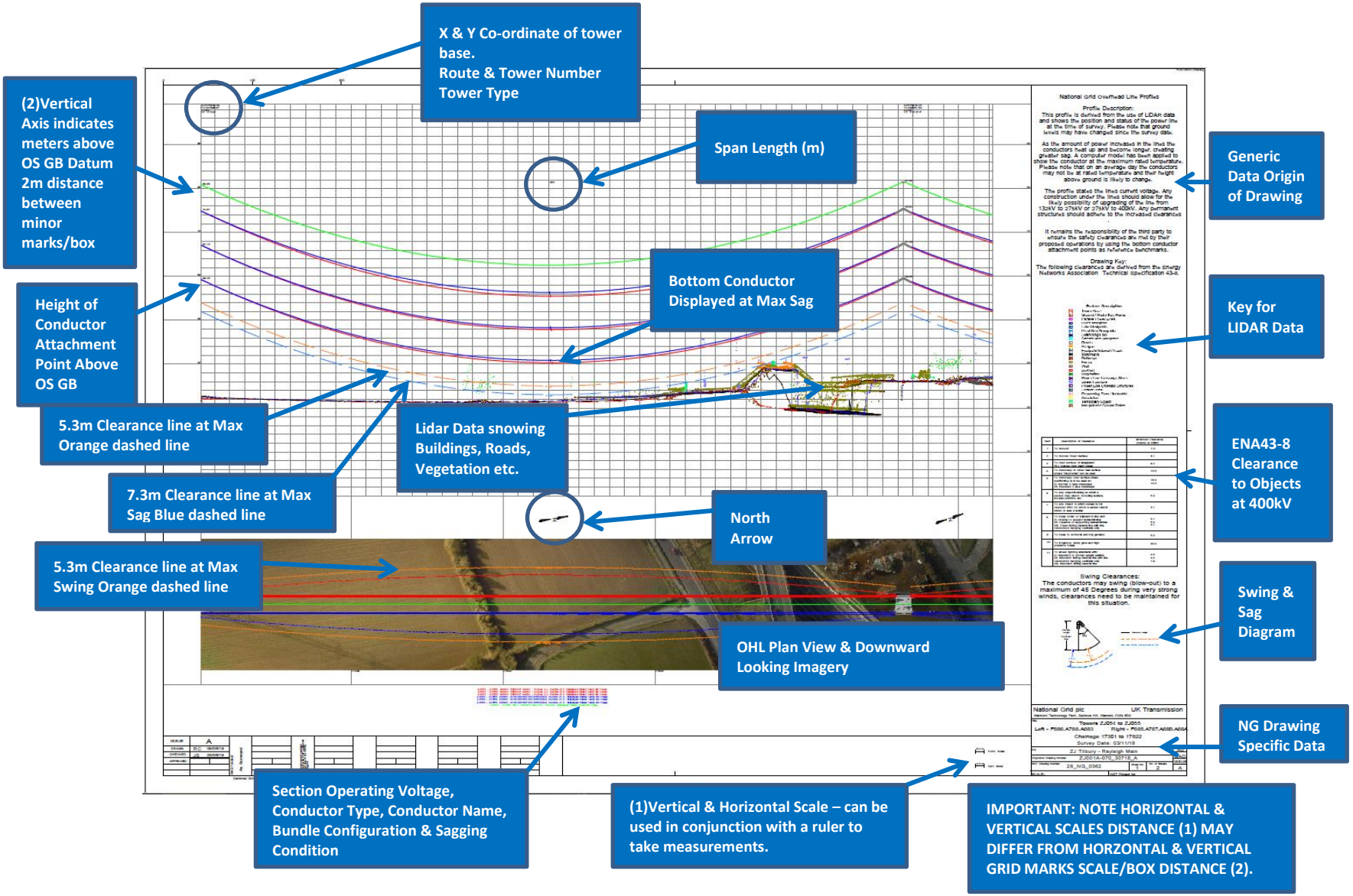
Email:
assetprotection@nationalgrid.com

Call Asset Protection on:
0800 0014282

Opening hours:
Monday to Friday 08:00-16:00

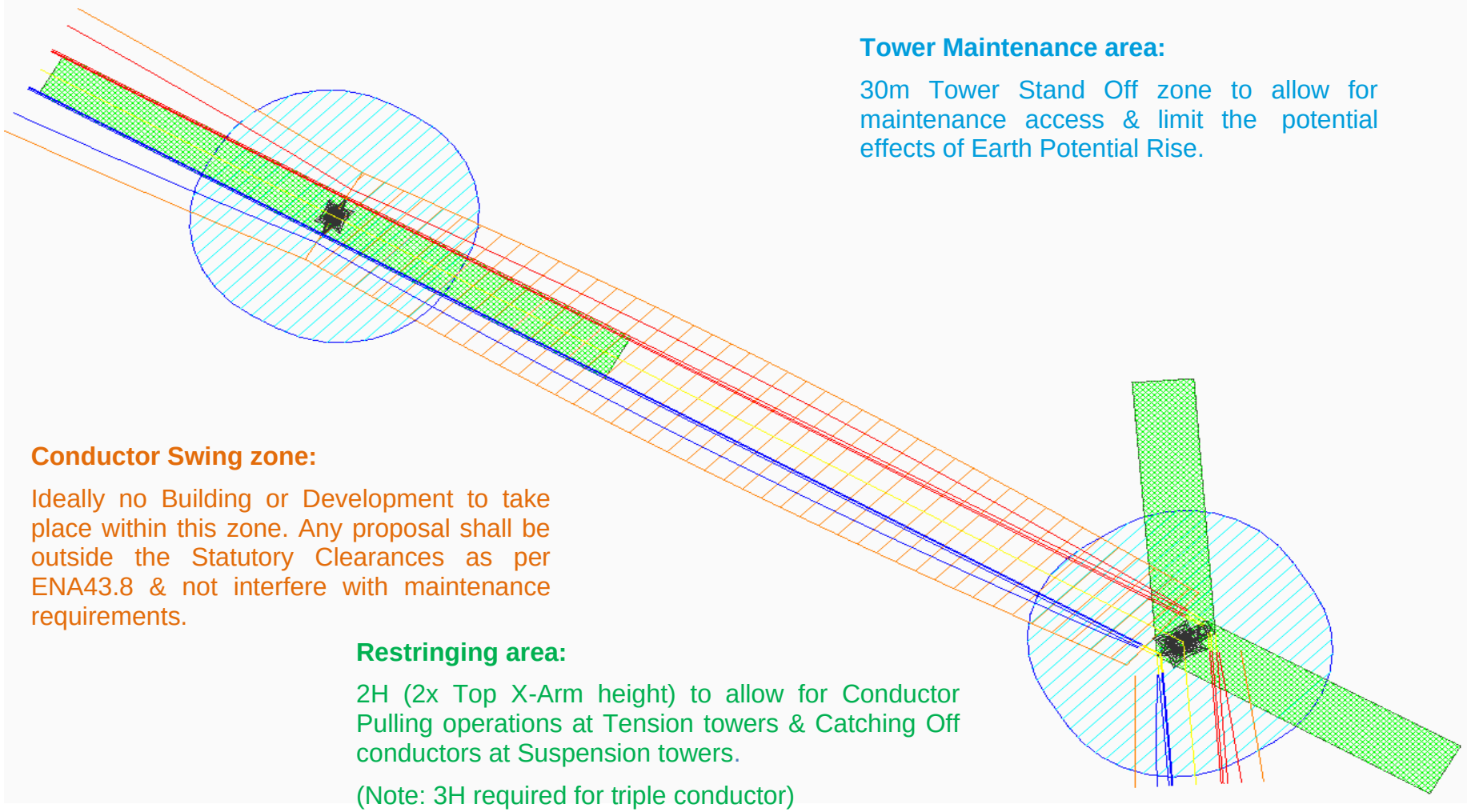
14 APPENDIX A

OHL Profile Drawing Guide



15 APPENDIX B

OHL Tower Stand Off & Reconductoring Area



Tower Maintenance area:

30m Tower Stand Off zone to allow for maintenance access & limit the potential effects of Earth Potential Rise.

Conductor Swing zone:

Ideally no Building or Development to take place within this zone. Any proposal shall be outside the Statutory Clearances as per ENA43.8 & not interfere with maintenance requirements.

Restringing area:

2H (2x Top X-Arm height) to allow for Conductor Pulling operations at Tension towers & Catching Off conductors at Suspension towers.

(Note: 3H required for triple conductor)

Date: 07 April 2026
Our ref: 543892
Your ref: EN0310002

Hannah Terry
Planning Inspectorate
salinaehydrogenstorage@planninginspectorate.gov.uk

BY EMAIL ONLY

Consultations
Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

T 0300 060 900

Dear Hannah Terry

Environmental Impact Assessment Scoping Consultation under Regulation 10 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) – Regulation 11

Proposal: Salinae Hydrogen Storage Project
Location: British Salt/Kistos Energy Storage facility at Warmingham, Cheshire East

Thank you for seeking our advice on the scope of the Environmental Statement (ES) in the consultation dated 13 March 2026, received on the same date.

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.

A robust assessment of environmental impacts and opportunities, based on relevant and up to date environmental information, should be undertaken prior to an application for a Development Consent Order (DCO). Annex A to this letter provides Natural England's detailed advice on the scope of the Environmental Impact Assessment (EIA) for the proposed development.

We have engaged with the applicant once via our Discretionary Advice Service (DAS) to introduce the project and provide early advice in relation to the scope of issues. These are the first detailed plans Natural England have seen to be able to make comment on potential impacts from the project. We are keen for this engagement to continue throughout the pre-application process on the topics highlighted in this response.

Further to the advice contained within Annex A and in terms of the use of novel technologies in the design of this development, Natural England refers the Planning Inspectorate to the Department of Energy Security and Net Zero commissioned project 'Environmental Capacity for Industrial Clusters'[1]. The scope of this project is relevant to the air quality, water quality and possibly water resources themes needing assessment as part of EIA.

Please send any new consultations or further information on this consultation to consultations@naturalengland.org.uk.

[1] https://www.gov.uk/government/collections/environmental-capacity-for-industrial-clusters

Yours sincerely,

Michele Hardwick
Sustainable Development
Cheshire to Lancashire Area Team

Annex A – Natural England Advice on EIA Scoping

1. General Principles

1.1 Regulation 11 of the Infrastructure Planning Regulations 2017 - (The EIA Regulations) sets out the information that should be included in an ES to assess impacts on the natural environment. This includes:

- A description of the development – including physical characteristics and the full land use requirements of the site during construction and operational phases
- Appropriately scaled and referenced plans which clearly show the information and features associated with the development
- An assessment of alternatives and clear reasoning as to why the preferred option has been chosen
- A description of the aspects and matters requested to be scoped out of further assessment with adequate justification provided.
- Expected residues and emissions (water, air and soil pollution, noise, vibration, light, heat, radiation etc.) resulting from the operation of the proposed development
- A description of the aspects of the environment likely to be significantly affected by the development including biodiversity (for example fauna and flora), land, including land take, soil, water, air, climate (for example greenhouse gas emissions, impacts relevant to adaptation), cultural heritage and landscape and the interrelationship between the above factors
- A description of the likely significant effects of the development on the environment – this should cover direct effects but also any indirect, secondary, cumulative, short, medium, and long term, permanent and temporary, positive, and negative effects. Effects should relate to the existence of the development, the use of natural resources (in particular land, soil, water and biodiversity) and the emissions from pollutants. This should also include a description of the forecasting methods to predict the likely effects on the environment
- A description of the measures envisaged to prevent, reduce and where possible offset any significant adverse effects on the environment
- An outline of the structure of the proposed ES

1.2 Natural England acknowledge that a degree of flexibility is required in the design of each of the facilities within this application and a number of different technologies appear to be in scope at present, in particular for the Low Carbon Hydrogen Power Plant and Hydrogen Storage Facility. The approach to assessment must ensure a precautionary worst-case scenario for all the potential impacts on protected sites is undertaken. Several options may require assessment if there remains uncertainty as to the choice of process.

2. Cumulative and in-combination effects

2.1 Given the long-time frame associated with this project, in both construction and operational phases, it will be important for any assessment to consider the potential cumulative effects of this proposal. This includes all supporting infrastructure, with other similar proposals and a thorough assessment of the 'in combination' effects of the proposed development with any existing developments and current applications. A full consideration of the implications of the whole scheme should be included in the ES.

2.2 An impact assessment should identify, describe, and evaluate the effects that are likely to result from the project in combination with other projects and activities that are being, have been or will be carried out. The following types of projects should be included in such an assessment (subject to available information):

a. existing completed projects;
b. approved but uncompleted projects;
c. ongoing activities;

d. plans or projects for which an application has been made and which are under consideration by the consenting authorities; and
e. plans and projects which are reasonably foreseeable, i.e. projects for which an application has not yet been submitted, but which are likely to progress before completion of the development and for which sufficient information is available to assess the likelihood of cumulative and in-combination effects.

2.3 Table 1 includes a non-comprehensive list of other projects that are proposed in close proximity to this proposal and relate to the HyNet North West project. The ES should consider potential impacts from the Project both alone and in-combination with all other relevant plans or projects.

Table 1: Plans or projects that Natural England is aware of that might need to be considered in the ES	
Project/Plan	Status
HyNet Carbon Dioxide Pipeline	Decided
HyNet North West Hydrogen pipeline	Pre-application
Peak Cluster CCS Pipeline	Pre-application
Frodsham Solar	Examination
Stanlow Hydrogen Ready Modular Combined Heat and Power Project	Pre-application
Keuper Underground Gas Storage Project	Decided
Keuper Underground Gas Storage Facility Material Change 1	Pre-application

3. Environmental data

3.1 Natural England is required to make available information it holds where requested to do so. National datasets held by Natural England are available at http://www.naturalengland.org.uk/publications/data/default.aspx.

3.2 Detailed information on the natural environment is available at www.magic.gov.uk. This includes Marine Conservation Zone GIS shapefiles.

3.3 Natural England's SSSI Impact Risk Zones are a GIS dataset which can be used to help identify the potential for the development to impact on a SSSI. The dataset and user guidance can be accessed from the Natural England Open Data Geoportal.

3.4 Natural England does not hold local information on local sites, local landscape character, priority habitats and species or protected species. Local environmental data should be obtained from the appropriate local bodies. This may include the local environmental records centre, the local wildlife trust, local geo-conservation group or other recording society.

4. Biodiversity and Geodiversity

4.1 The assessment will need to include potential impacts of the proposal upon sites and features of nature conservation interest as well as opportunities for nature recovery through biodiversity net gain (BNG). There might also be strategic approaches to take into account.

4.2 Ecological Impact Assessment (EcIA) is the process of identifying, quantifying, and evaluating the potential impacts of defined actions on ecosystems or their components. EcIA may be carried out as part of the EIA process or to support other forms of environmental assessment or appraisal. Guidelines have been developed by the Chartered Institute of Ecology and Environmental Management (CIEEM).

5. International and European designated sites

5.1 The ES should thoroughly assess the potential for the proposal to affect internationally designated sites of nature conservation importance / European sites, including marine sites where relevant. This includes Special Protection Areas (SPA), Special Areas of Conservation (SAC), listed Ramsar sites, candidate SAC and proposed SPA.

5.2 Article 6 (3) of the Habitats Directive requires an appropriate assessment where a plan or project is likely to have a significant effect upon a European Site, either individually or in combination with other plans or projects.

5.3 Given the level of uncertainty that remains as to the details of the technologies to be used in the development, Natural England welcomes the intention of the applicant to carry out a Habitats Regulation Assessment (Scoping Report, page 31) to assess any potential impacts on International and European designated sites, including, but not limited to, Mersey Estuary Special Protection Area (SPA) and Mersey Estuary Ramsar.

6. Nationally designated sites

6.1 Sites of Special Scientific Interest are protected under the Wildlife and Countryside Act 1981 (as amended). Further information on the SSSI and its special interest features can be found at www.magic.gov.uk.

6.2 Natural England's SSSI Impact Risk Zones can be used to help identify the potential for the development to impact on a SSSI. The dataset and user guidance can be accessed from the Natural England Open Data Geoportal

6.3 The development site is within or may impact on the following **Site of Special Scientific Interest:**

- Sandbach Flashes SSSI

6.4 The ES should include a full assessment of the direct and indirect effects of the development on the features of special interest within Sandbach Flashes SSSI and identify appropriate mitigation measures to avoid, minimise or reduce any adverse significant effects.

6.5 The consideration of likely significant effects should include any functionally linked land outside the designated site. These areas may provide important habitat for mobile species populations that are interest features of the SSSI, for example birds. This can also include areas which have a critical function to a habitat feature within a site, for example by being linked through hydrology or geology.

6.6 Further information on the features of the SSSI and some of the expected impact pathways from the Project are included in Table 2.

Table 2: Potential risks to nationally designated sites: the development is within or may impact on the following sites

Site name with link to citation	**Features which the ES will need to consider**	**Potential impact pathways where further information/assessment is required**
Sandbach Flashes SSSI	Sandbach Flashes SSSI is a nationally important site for both biological and geological features. It consists a number of pools formed as the result of subsidence due to salt mining. The site supports a range of water bodies which vary from freshwater to highly saline. Designated features include	Construction Impacts • Temporary or permanent habitat loss and fragmentation from construction impacts, including offsite bird features • Impacts to features from emissions to air from construction plant, equipment and traffic including dust deposition.

Table 2: Potential risks to nationally designated sites: the development is within or may impact on the following sites		
Site name with link to citation	**Features which the ES will need to consider**	**Potential impact pathways where further information/assessment is required**
	eutrophic lakes, saltmarsh and karst landscape. Moston Flash (Unit 1) is designated for its geological features which consist of two parallel hollows. Biological features include aggregations on non breeding birds including: • Curlew; • Lapwing; • Snipe; • Teal; • Wigeon; and • Assemblages of mixed breeding birds. LiDAR data suggests subsidence in this area appears to be increasing so Natural England recommends further investigation of the stability of this area may be required to inform any potential impacts of the construction and operation of the proposal to the geological interest of the SSSI.	• Impacts of construction, including both above and below ground structures, on geological features. • Impacts to features from construction surface water and sediment run-off. • Impacts to features, including local water and air quality, from disturbance to contaminated land, including landfill leachate and landfill gas. • Impacts to features from construction noise, light and vibration, including an assessment of disturbance to bird features of the SSSI. <u>Operational Impacts</u> • Temporary or permanent habitat loss and fragmentation from permanent infrastructure, including offsite bird features • Impacts to features from emissions to air from operational traffic and process emissions, including in combination. • Impacts to features from any operational discharges to surface water, including waste water. • Impacts to features from use of operational process chemicals, including accidental release. • Impacts to features from surface water abstraction from the River Wheelock. • Impacts to habitats and species from any pipeline and cavern storage operation, including heat emissions or accidental leakage impacting geology or hydrology • Impacts to features from disturbance to contaminated land, including landfill leachate and landfill gas. • Impacts to biological & geological features from operational noise, light and vibration, including an assessment of disturbance to bird features of the SSSI.

7. Regionally and Locally Important Sites

7.1 The ES should consider any impacts upon local wildlife and geological sites, including local nature reserves. Local Sites are identified by the local wildlife trust, geoconservation group or other local group and protected under the NPPF (paragraph 192 and 193). The ES should set

out proposals for mitigation of any impacts and if appropriate, compensation measures and opportunities for enhancement and improving connectivity with wider ecological networks. Contact the relevant local body for further information.

7.2 Natural England welcome the inclusion of Local Nature Conservation Sites within the EIA Scoping Report.

8. Protected Species

8.1 The conservation of species protected under the Wildlife and Countryside Act 1981 and the Conservation of Habitats and Species Regulations 2017 is explained in Part IV and Annex A of Government Circular 06/2005 *Biodiversity and Geological Conservation: Statutory Obligations and their Impact within the Planning System*.

8.2 The ES should assess the impact of all phases of the proposal on protected species (including, for example, great crested newts, reptiles, birds, water voles, badgers and bats). Natural England does not hold comprehensive information regarding the locations of species protected by law. Records of protected species should be obtained from appropriate local biological record centres, nature conservation organisations and local groups. Consideration should be given to the wider context of the site, for example in terms of habitat linkages and protected species populations in the wider area.

8.3 Natural England welcomes the intention of the applicant to undertake a series of surveys for protected species (Scoping Report, pages 67-70). The area likely to be affected by the development should be thoroughly surveyed by competent ecologists at appropriate times of year for relevant species and the survey results, impact assessments and appropriate accompanying mitigation strategies included as part of the ES. Surveys should always be carried out in optimal survey time periods and to current guidance by suitably qualified and, where necessary, licensed, consultants.

8.4 Natural England has adopted standing advice for protected species, which includes guidance on survey and mitigation measures. A separate protected species licence from Natural England or Defra may also be required.

8.5 Applicants should check to see if a mitigation licence is required using Natural England guidance on licensing Natural England wildlife licences. Applicants can also make use of Natural England's charged service Pre Submission Screening Service for a review of a draft wildlife licence application. Natural England then reviews a full draft licence application to issue a Letter of No Impediment (LONI) which explains that based on the information reviewed to date, that it sees no impediment to a licence being granted in the future should the DCO be issued. This is done to give the Planning Inspectorate confidence to make a recommendation to the relevant Secretary of State in granting a DCO. See Advice Note Eleven, Annex C – Natural England and the Planning Inspectorate | National Infrastructure Planning for details of the LONI process.

9. District Level Licensing for Great Crested Newts

9.1 Natural England is aware Uniper Salinae Hydrogen is considering applying to use the District Level Licensing scheme for great crested newts (GCN).

9.2 Where strategic approaches such as DLL for GCN are used, a Letter of No Impediment (LONI) will not be required. Instead, the developer will need to provide evidence to the Examining Authority (ExA) on how and where this approach has been used in relation to the proposal, which must include a counter-signed Impact Assessment and Conservation Payment Certificate (IACPC) from Natural England, or a similar approval from an alternative DLL provider.

9.3 The DLL approach is underpinned by a strategic area assessment which includes the identification of risk zones, strategic opportunity area maps and a mechanism to ensure adequate compensation is provided regardless of the level of impact. In addition, Natural

England (or an alternative DLL provider) will undertake an impact assessment, the outcome of which will be documented in the IACPC (or equivalent).

9.4 If no GCN surveys have been undertaken, Natural England's risk zone modelling may be relied upon. During the impact assessment, Natural England will inform the applicant whether their scheme is within one of the amber risk zones and therefore whether the Proposed Development is likely to have a significant effect on GCN.

9.5 The IACPC will also provide additional detail including information on the Proposed Development's impact on GCN and the appropriate compensation required.

9.6 By demonstrating that the DLL scheme for GCN will be used, consideration of GCN in the ES can be restricted to cross-referring to the Natural England (or alternative provider) IACPC as a justification as to why significant effects on GCN populations as a result of the Proposed Development would be avoided.

10. Priority Habitats and Species

10.1 Priority Habitats and Species are of particular importance for nature conservation and included in the England Biodiversity List published under section 41 of the Natural Environment and Rural Communities Act 2006. Most priority habitats will be mapped either as Sites of Special Scientific Interest, on the Magic website or as Local Wildlife Sites. Lists of priority habitats and species can be found here. Natural England does not routinely hold species data. Such data should be collected when impacts on priority habitats or species are considered likely.

10.2 Consideration should also be given to the potential environmental value of brownfield sites, often found in urban areas and former industrial land. Sites can be checked against the (draft) national Open Mosaic Habitat (OMH) inventory published by Natural England and freely available to download. Further information is also available here.

10.3 Natural England welcomes the intention of the applicant to undertake a series of surveys for priority habitats (Scoping Report, pages 70-71). An appropriate level habitat survey should be carried out on the site, to identify any important habitats present. In addition, ornithological, botanical, and invertebrate surveys should be carried out at appropriate times in the year, to establish whether any scarce or priority species are present.

10.4 The Environmental Statement should include details of:

- Any historical data for the site affected by the proposal (e.g. from previous surveys)
- Additional surveys carried out as part of this proposal
- The habitats and species present
- The status of these habitats and species (e.g. whether priority species or habitat)
- The direct and indirect effects of the development upon those habitats and species
- Full details of any mitigation or compensation measures
- Opportunities for biodiversity net gain or other environmental enhancement

11 Biodiversity Net Gain

11.1 Natural England welcomes the commitment to complete additional surveys to inform the design and implementation of Biodiversity Net Gain (BNG) (Scoping Report, page 133).

11.2 The Environment Act 2021 includes NSIPs in the requirement for BNG, with the biodiversity gain objective for NSIPs defined as at least a 10% increase in the pre-development biodiversity value of the on-site habitat. It is the intention that BNG should apply to all terrestrial NSIPs accepted for examination from May 2026.

11.3 Although BNG is not yet a mandatory requirement for NSIPs, we strongly recommend that

BNG provision is secured through this development. By reviewing the project's biodiversity gain plan at this early stage, it gives us an opportunity to help maximise outcomes and reduce risks.

11.4 BNG outcomes can be achieved on site, off-site or through a combination of both. On-site provision should be considered first. Delivery should create or enhance habitats of equal or higher value. When delivering net gain, opportunities should be sought to link delivery to relevant plans or strategies e.g. Green Infrastructure Strategies or Local Nature Recovery Strategies.

11.5 Local Nature Recovery Strategies (LNRS) are a new mandatory system of spatial strategies for nature established by the Environment Act 2021. The Cheshire & Warrington LNRS was published in November 2025 and identifies strategic priorities for nature protection, recovery, and enhancement. Given the size and scale of the project, there are opportunities not only for enhancing biodiversity in the locality, but also to create and enhance ecological connectivity in the area, contributing to the Nature Recovery Network and climate change resilience.

11.6 The biodiversity baseline should include all land contained within the site's red line boundary and proposals can be iteratively refined over time and throughout detailed design. We encourage developers to:
• develop their BNG proposals in adherence with well-established BNG principles
• use the latest version of the Defra biodiversity metric, adhering to the metric guidance.

11.7 Biodiversity gains should ideally be secured for a minimum of 30 years and be subject to adaptive management and monitoring. BNG plans should be secured by a suitably worded requirement in the DCO.

12. Landscape and visual impacts

12.1 The environmental assessment should refer to the relevant National Character Areas. Character area profiles set out descriptions of each landscape area and statements of environmental opportunity.

12.2 The EIA should include a full assessment of the potential impacts of the development on local landscape character using landscape assessment methodologies. We encourage the use of Landscape Character Assessment (LCA), based on the good practice guidelines produced jointly by the Landscape Institute and Institute of Environmental Assessment in 2013. LCA provides a sound basis for guiding, informing, and understanding the ability of any location to accommodate change and to make positive proposals for conserving, enhancing or regenerating character.

12.3 A landscape and visual impact assessment should also be carried out for the proposed development and surrounding area. Natural England recommends use of the methodology set out in *Guidelines for Landscape and Visual Impact Assessment 2013 (*(3rd edition) produced by the Landscape Institute and the Institute of Environmental Assessment and Management. For National Parks and AONBs, we advise that the assessment also includes effects on the 'special qualities' of the designated landscape, as set out in the statutory management plan for the area. These identify the particular landscape and related characteristics which underpin the natural beauty of the area and its designation status.

12.4 The assessment should also include the cumulative effect of the development with other relevant existing or proposed developments in the area. This should include an assessment of the impacts of other proposals currently at scoping stage.

12.5 To ensure high quality development that responds to and enhances local landscape character and distinctiveness, the siting and design of the proposed development should reflect

local characteristics and, wherever possible, use local materials. Account should be taken of local design policies, design codes and guides as well as guidance in the National Design Guide and National Model Design Code. The ES should set out the measures to be taken to ensure the development will deliver high standards of design and green infrastructure. It should also set out detail of layout alternatives, where appropriate, with a justification of the selected option in terms of landscape impact and benefit.

12.6 The National Infrastructure Commission has also produced Design Principles for National Infrastructure - NIC endorsed by Government in the National Infrastructure Strategy.

13 Connecting People with nature

13.1 Natural England note that both temporary and permanent impacts on PROW are anticipated. The ES should consider potential impacts on access land, common land, public rights of way and, where appropriate, the England Coast Path and coastal access routes and coastal margin in the vicinity of the development, in line with NPPF paragraph 105. It should assess the scope to mitigate for any adverse impacts. Rights of Way Improvement Plans (ROWIP) can be used to identify public rights of way within or adjacent to the proposed site that should be maintained or enhanced.

13.2 Measures to help people to better access the countryside for quiet enjoyment and opportunities to connect with nature should be considered. Such measures could include reinstating existing footpaths or the creation of new footpaths, cycleways, and bridleways. Links to other green networks and, where appropriate, urban fringe areas should also be explored to help promote the creation of wider green infrastructure. Access to nature within the development site should also be considered, including the role that natural links have in connecting habitats and providing potential pathways for movements of species.

13.3 Relevant aspects of local authority green infrastructure strategies should be incorporated where appropriate.

14 Soils and Agricultural Land Quality

14.1 Soils are a valuable, finite natural resource and should also be considered for the ecosystem services they provide, including for food production, water storage and flood mitigation, as a carbon store, reservoir of biodiversity and buffer against pollution. It is therefore important that the soil resources are protected and sustainably managed. Impacts from the development on soils and best and most versatile (BMV) agricultural land should be considered in line with paragraphs 187 and 188 of the NPPF. Further guidance is set out in the Natural England Guide to assessing development proposals on agricultural land.

14.2 The following issues should be considered and, where appropriate, included as part of the Environmental Statement (ES):

- The degree to which soils would be disturbed or damaged as part of the development
- The extent to which agricultural land would be disturbed or lost as part of this development, including whether any best and most versatile (BMV) agricultural land would be impacted.

14.3 Given the size and scale of the development, Natural England welcomes the commitment to complete additional surveys to confirm the ALC of Grade 3 land and determine the extent of BMV land affected (Scoping Report page 85). For information on the availability of existing ALC information see www.magic.gov.uk.

- Where an ALC and soil survey of the land is required, this should normally be at a detailed level, e.g. one auger boring per hectare, (or more detailed for a small site) supported by pits dug in each main soil type to confirm the physical characteristics of the full depth of the soil resource, i.e. 1.2 metres. The survey data can inform suitable soil handling methods and

appropriate reuse of the soil resource where required (e.g. agricultural reinstatement, habitat creation, landscaping, allotments and public open space).

- The ES should set out details of how any adverse impacts on BMV agricultural land can be minimised through site design/masterplan.

- The ES should set out details of how any adverse impacts on soils can be avoided or minimised and demonstrate how soils will be sustainably used and managed, including consideration in site design and master planning, and areas for green infrastructure or biodiversity net gain. The aim will be to minimise soil handling and maximise the sustainable use and management of the available soil to achieve successful after-uses and minimise off-site impacts.

14.4 Further information is available in the Defra Construction Code of Practice for the Sustainable Use of Soil on Development Sites and The British Society of Soil Science Guidance Note Benefitting from Soil Management in Development and Construction.

15 Air Quality

15.1 Air quality in the UK has improved over recent decades but air pollution remains a significant issue. For example, approximately 85% of protected nature conservation sites are currently in exceedance of nitrogen levels where harm is expected (critical load) and approximately 87% of sites exceed the level of ammonia where harm is expected for lower plants (critical level of 1µg) [1].A priority action in the England Biodiversity Strategy is to reduce air pollution impacts on biodiversity. The Government's Clean Air Strategy also has a number of targets to reduce emissions including to reduce damaging deposition of reactive forms of nitrogen by 17% over England's protected priority sensitive habitats by 2030, to reduce emissions of ammonia against the 2005 baseline by 16% by 2030 and to reduce emissions of NOx and SO_2 against a 2005 baseline of 73% and 88% respectively by 2030. Shared Nitrogen Action Plans (SNAPs) have also been identified as a tool to reduce environmental damage from air pollution.

15.2 The planning system plays a key role in determining the location of developments which may give rise to pollution, either directly, or from traffic generation, and hence planning decisions can have a significant impact on the quality of air, water and land. The ES should take account of the risks of air pollution and how these can be managed or reduced. This should include taking account of any strategic solutions or SNAPs, which may be being developed or implemented to mitigate the impacts on air quality. Further information on air pollution impacts and the sensitivity of different habitats/designated sites can be found on the Air Pollution Information System (www.apis.ac.uk).

15.3 Information on air pollution modelling, screening and assessment can be found on the following websites:

- SCAIL Combustion and SCAIL Agriculture - http://www.scail.ceh.ac.uk/
- Ammonia assessment for agricultural development https://www.gov.uk/guidance/intensive-farming-risk-assessment-for-your-environmental-permit
- Environment Agency Screening Tool for industrial emissions https://www.gov.uk/guidance/air-emissions-risk-assessment-for-your-environmental-permit
- Defra Local Air Quality Management Area Tool (Industrial Emission Screening Tool) – England http://www.airqualityengland.co.uk/laqm

16 Water Quality

[1] Report: Trends Report 2020: Trends in critical load and critical level exceedances in the UK - Defra, UK

16.1 The planning system plays a key role in determining the location of developments which may give rise to water pollution, and hence planning decisions can have a significant impact on water quality, and land. The assessment should take account of the risks of water pollution and how these can be managed or reduced. A number of water dependent protected nature conservation sites have been identified as failing condition due to elevated nutrient levels and nutrient neutrality is consequently required to enable development to proceed without causing further damage to these sites. If your planning application is affected by Nutrient Neutrality, the ES needs to take account of any strategic solutions for nutrient neutrality or Diffuse Water Pollution Plans, which may be being developed or implemented to mitigate and address the impacts of elevated nutrient levels. These solutions or plans should be relevant to the specific planning consultation site. Further information can be obtained from the Local Planning Authority.

17 Climate Change

17.1 The ES should identify how the development affects the ability of the natural environment (including habitats, species, and natural processes) to adapt to climate change, including its ability to provide adaptation for people. This should include impacts on the vulnerability or resilience of a natural feature (i.e. what's already there and affected) as well as impacts on how the environment can accommodate change for both nature and people, for example whether the development affects species ability to move and adapt. Nature-based solutions, such as providing green infrastructure on-site and in the surrounding area (e.g. to adapt to flooding, drought and heatwave events), habitat creation and peatland restoration, should be considered. The ES should set out the measures that will be adopted to address impacts.

17.2 Further information is available from the Committee on Climate Change's (CCC) Independent Assessment of UK Climate Risk, the National Adaptation Programme (NAP), the Climate Change Impacts Report Cards (biodiversity, infrastructure, water etc.) and the UKCP18 climate projections.

17.3 The Natural England and RSPB Climate Change Adaptation Manual (2020) provides extensive information on climate change impacts and adaptation for the natural environment and adaptation focussed nature-based solutions for people. It includes the Landscape Scale Climate Change Assessment Method that can help assess impacts and vulnerabilities on natural environment features and identify adaptation actions. Natural England's Nature Networks Evidence Handbook (2020) also provides extensive information on planning and delivering nature networks for people and biodiversity.

17.4 The ES should also identify how the development impacts the natural environment's ability to store and sequester greenhouse gases, in relation to climate change mitigation and the natural environment's contribution to achieving net zero by 2050. Natural England's Carbon Storage and Sequestration by Habitat report (2021) and the British Ecological Society's nature-based solutions report (2021) provide further information.

To:
FAO Planning Inspectorate

Email:
salinaehydrogenstorage@planninginspectorate.gov.uk

From: Town Planning Team LNW
Network Rail
1st Floor
Square One
4 Travis Street
Manchester
M1 2NY
Email: TownPlanningNWC@networkrail.co.uk

Date: 9th April 2026

FAO Planning Inspector

EN0310002
Salinae Hydrogen Storage project
For the drilling and solution mining of up to 13no. underground caverns for the storage of up to 400GWh of hydrogen. This includes the construction and operation of a hydrogen gas processing plant (including maximum 18m high compressor buildings, maximum 15m high dehydration vessels and maximum 50m high ground flare) and associated facilities, earthworks, pipelines, access roads, electrical and communications connections, lighting, security fencing and a temporary construction compound with laydown and welfare. Also including the diversion of a Public Right of Way

Thank you for consulting Network Rail (NR) on the above proposal.

Network Rail is a statutory consultee for any planning applications within 10 metres of relevant railway land (as the Rail Infrastructure Managers for the railway, set out in Article 16 of the Development Management Procedure Order) and for any development likely to result in a material increase in the volume or a material change in the character of traffic using a level crossing over a railway (as the Rail Network Operators, set out in Schedule 4 (J) of the Development Management Procedure Order).

Network Rail is also a statutory undertaker responsible for maintaining and operating the railway infrastructure and associated estate. It owns, operates and develops the main rail network. Network Rail aims to protect and enhance the railway infrastructure, therefore any proposed development which is in close proximity to the railway line or could potentially affect Network Rail's specific land interests will need to be carefully considered.

NR's National Mining Engineering (NME) team have undertaken an initial review of the proposal for installing underground new hydrogen gas facilities and new gas processing plant including construction plant operations, new facilities (e.g. flare stack) within proximity to NR infrastructure (as well as proposed new drainage systems).

The current EIA Scoping documents have not fully considered the impacts that may affect NR infrastructure (which carries passenger & freight services) on the West Coast Main Line (WCML) and how these services

could be impacted by the future site operations.

We have provided an outline where NR believe that further revision and amendment are needed to the scoping report to ensure that the EIA and all future documents include consideration & mitigation measures for the protection of existing and any future rail operations and proposed construction & as a permanent arrangement / for all site activities.

To ensure that these are managed throughout the lifetime of the project the applicant must sign up to a BAPA (Basic Asset Protection Agreement) with NR's Asset Protection (ASPRO) team in order to comply with the relevant NR Standards (e.g. NR Form A & B etc, mining, track monitoring if track support zone intersected, working in proximity to railway line) and also to allow NR to have legal reliance on the EIA reports by the "applicant" (Uniper UK ltd). Details of how to set up the initial interface here.

Asset Protection
The Promoter must liaise with Network Rail's Asset Protection Team and enter into appropriate Asset Protection Agreements to ensure safety and compliance during construction. (All new enquiries will need to be submitted via the ***Asset Protection and Optimisation - Customer Portal***
Link to ASPRO ACE Portal ASPRO Network Rail Implementation (oraclecloud.com) From there, the client can create an account and submit their enquiry. Enquiry will then be assigned to one of the Asset Protection team to progress. The assigned team member will then be in a position to review and comment on any submissions from the outside party).

Submission is free of charge, however given the scale of the project the BAPA will incur fees to the developer (amount to be determined by ASPRO).

As the items below have not been identified then mitigations identified in Chapters 9-18, 22 may not cover them. We therefore require further clarification on:

2.5 Construction
No spatial relationship with the proposed storage caverns and the existing NR Infrastructure is shown on plans. There needs to be a clear control mechanism for the monitoring of potential ground instability during these site works, operational lifetime of the equipment etc and during decommissioning to safeguard NR services. The EIA needs to be reviewed/revised and updated accordingly.

2.8 Decommissioning
Identification that NR infrastructure could be at risk without approved NR decommission plan.

5.4 Historic Environment
There is no NR infrastructure e.g. bridges, other wayleaves (including overhead power lines) identified within the report. Will these be affected by construction traffic? The EIA needs to be reviewed/revised and updated accordingly.

5.6 Geology Hydrogeology and Soil Section
No assessment of the type/condition of the soil present along the WCML and how these may be affected by the development. The EIA needs to be reviewed/revised and updated accordingly.

5.7 Noise and Vibration Section
Network Rail Infrastructure (track/earthwork or structure) are not indicated as a potential receptor in current documentation. The EIA needs to be reviewed/revised and updated accordingly.

5.8 Air Quality
Network Rail Infrastructure (passengers/staff) are not indicated as a potential receptor currently. What about dust/flare smoke/smell or odour from the new flare stack? This is not considered or mentioned in current documents. The EIA needs to be reviewed/revised and updated accordingly.

5.10 Climate Vulnerability
Please include the potential for climate change impacts on NR infrastructure on the proposed ground water maintenance plans for the daily/post completion and in the potential 40 year decommission stages of the scheme.

21 Major Accidents
No NR (infrastructure or operations) hazardous activities have been identified or how the developer proposes to control hazards or new site hazards on site. These issues are covered by NR under various NR standards which the developer will need to undertake works in accordance with these standards.

23 Proposed Scope & Consultation
Network Rail should be a key listed consultee for the EIA.

In addition to the comments above, the developer is advised of the following:

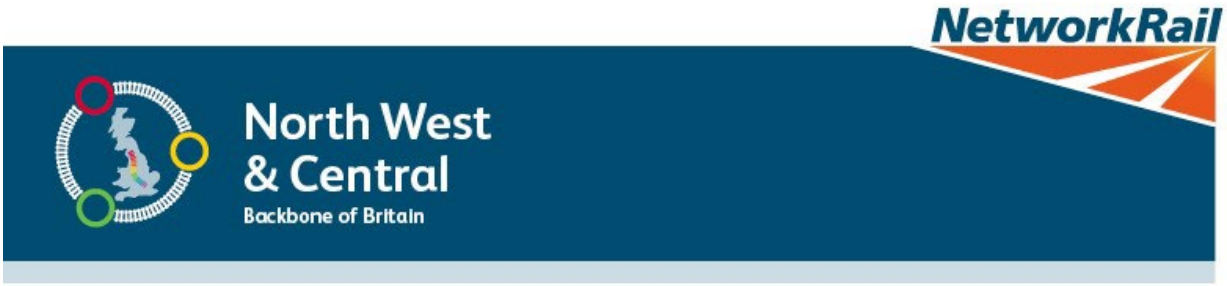
Detailed Location Plans
Plans showing all proposed crossings and intersections with Network Rail assets, including rail lines and associated infrastructure.

Property Agreements
The Promoter will be required to enter into appropriate Property Agreements with Network Rail for any works impacting our land or assets.

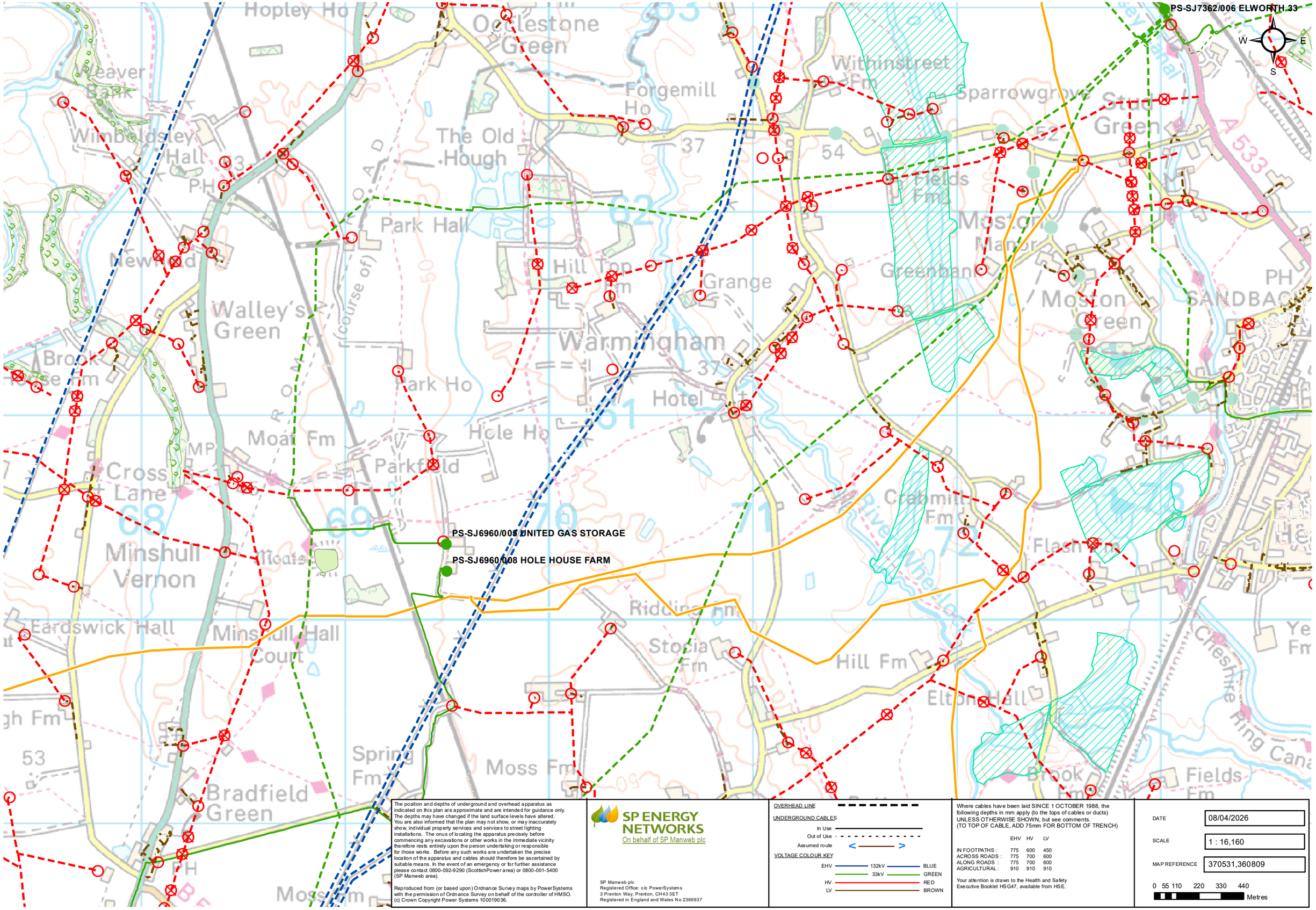
Should the developer have any queries please let me know.

From

Diane Clarke RTPI Tech
Town Planning Technician NWC
Network Rail Property (NW&C)
Square One, 4 Travis Street, Manchester M1 2NY
Email address for all applications and notifications: TownPlanningNWC@networkrail.co.uk



EN0310002 Salinae Hydrogen Storage Project EIA Notification - SPM Network



The position and depths of underground and overhead apparatus as indicated on this plan are approximate and are intended for guidance only. The depths may have changed if the land surface levels have altered. You are also informed that the plan may not show, or may inaccurately show, individual property services and services to street lighting installations. The onus of locating the apparatus precisely before commencing any excavations or other works in the immediate vicinity therefore rests entirely upon the person undertaking or responsible for those works. Before any such works are undertaken the precise location of the apparatus and cables should therefore be ascertained by suitable means. In the event of an emergency or for further assistance please contact 0800-092-9290 (ScottishPower area) or 0800-001-5400 (SP Manweb area).

SP ENERGY NETWORKS
On behalf of SP Manweb plc

SP Manweb plc
Registered Office: c/o PowerSystems
3 Prenton Way, Prenton, CH43 3ET
Registered in England and Wales No 2366937

OVERHEAD LINE

UNDERGROUND CABLES
- In Use
- Out of Use
- Assumed route

VOLTAGE COLOUR KEY

EHV	132kV	BLUE
	33kV	GREEN
HV		RED
LV		BROWN

Where cables have been laid SINCE 1 OCTOBER 1988, the following depths in mm apply (to the tops of cables or ducts) UNLESS OTHERWISE SHOWN, but see comments. (TO TOP OF CABLE; ADD 75mm FOR BOTTOM OF TRENCH)

	EHV	HV	LV
IN FOOTPATHS :	775	600	450
ACROSS ROADS :	775	700	600
ALONG ROADS :	775	700	600
AGRICULTURAL :	910	910	910

Your attention is drawn to the Health and Safety Executive Booklet HSG47, available from HSE.

DATE	08/04/2026
SCALE	1 : 16,160
MAP REFERENCE	370531,360809

0 55 110 220 330 440 Metres

From:	Planningsouth
To:	Salinae Hydrogen Storage; Planningsouth
Cc:	[redacted]
Subject:	RE: EN0310002 Salinae Hydrogen Storage Project EIA Notification
Date:	08 April 2026 15:41:34
Attachments:	image006.png image007.png image008.png image009.png image010.png image011.png image012.png image013.png image014.png image015.png image016.png SPM Plan.pdf

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Thank you for the opportunity to comment on the information made available as part of the recent EIA Scoping consultation for the above project.

I have reviewed the proposals and provide comments for SP Energy Networks who operate and manage the electricity network up to 132kV on behalf of the licenced network operator, SP Manweb, as shown in the attached plan.

SP Energy Networks must ensure the avoidance of any adverse impact on its assets as we all drive to maintain a network that is capable of meeting the increase in demand from an all-electric economy. The next decade will be crucial in preparing the grid for these changes and this is why we are very interested in being able to comment on the proposals which may undermine maintaining and operating and developing a suitable grid network.

SP Energy Networks requires there are measures in place to protect SP Manweb network assets and ensure safe working around the affected SPM network. At this stage, it is suggested plans of the proposed development and required environmental impact assessment include a plan showing all of the SPM network and an assessment of the impact of the proposals on this network. The proposed connections cross areas where there are many existing above and below ground utilities. The SPM network is critical national infrastructure that must not be impacted on. The SPM network assets should be clearly taken into account in the EIA baseline assessment.

There should also be a draft construction management plan which has a section on utilities and explains how impacts on the existing network is to be managed and mitigated. SPM requires there to be adequate space to maintain and operate its network in accordance with statutory obligations.

SP Energy Networks is seeking to obtain from the promoter detailed plans of their proposals showing SPM assets and the proposed DCO limits. The promoter should contact SPEN to obtain network plans showing all SPM assets. Until a plan showing the proposed development in relation to all SPM network affected by the proposals is provided and agreed, and protective provisions are drafted and discussed and agreed with SP Energy Networks, then objection is raised to there being no provision in the proposals to protect SPM assets.

The promoters assistance with this would help progress this matter. SP Energy Networks would like to resolve matters as much as possible and would like to see clarification on the crossover points/SPM assets as soon as further details can be provided.

Mitigation proposals will also need to take account of SPM assets and the operational requirements.

In addition, SPM benefits from numerous land rights interests across the proposed development area and these must be maintained for SPM to manage and operate a safe and reliable network.

There are a number of key areas to resolve in relation to SPM network, which is critical to protect as it is this network that will be relied upon to distribute the generation into local homes and businesses. Any adverse impacts on the SPM network impact on the benefits of delivering this proposed scheme. The promoter should discuss the above with SP Energy Networks as soon as possible in order to provide a robust EIA assessment. Given the extent of the information prepared and submitted, it is a reasonable expectation for there to be a plan produced showing the SPM assets as likely to be most affected and how, and an SPM network diversions worksheet that outlines how this network will be managed within the proposed development. This should be included in an infrastructure section in the EIA assessment.

SP Energy Networks will continue to review the proposals and may wish to raise further matters in due course and welcomes further engagement with the promoter at this stage of preparing their EIA assessment.

Regards
Steve

Steven Edwards | Senior Environmental Planner | **Land & Planning**
Tel: 0141 614 5656 | Int: 45656 | Mob: [redacted]

SP Energy Networks, 3 Prenton Way, Prenton Merseyside CH43 3ET
Follow us

Internal Use

From: Salinae Hydrogen Storage <salinaehydrogenstorage@planninginspectorate.gov.uk>
Sent: 13 March 2026 10:03
To: Planningsouth <planningsouth@spenergynetworks.co.uk>
Cc: Edwards, Steven [redacted]@spenergynetworks.co.uk>
Subject: EN0310002 Salinae Hydrogen Storage Project EIA Notification

---

EXTERNAL SENDER: Be cautious, especially with links and attachments. Report phishing if suspicious.

Dear Sir/Madam

Please see attached correspondence on the proposed Salinae Hydrogen Storage Project.

The Applicant for the Proposed Development intends to make an application for Development Consent under the Planning Act 2008. The Applicant has sought a Scoping Opinion from the Planning Inspectorate, on behalf of the Secretary of State, as to the scope and level of detail of the information to be provided within the Environmental Statement that will accompany its future application.

The Planning Inspectorate has identified you as a consultation body to inform the Scoping Opinion and is therefore inviting you to submit comments by **10 April 2026**. The deadline is a statutory requirement that cannot be extended.

Further information is included within the attached letter.

Kind regards,

Joseph Jones

Joseph Jones
Environmental Advisor
The Planning Inspectorate

@PINSgov The Planning Inspectorate planninginspectorate.gov.uk

Ensuring **fairness**, **openness** and **impartiality** across all our services

DPC:76616c646f72

The Coal Authority

200 Lichfield Lane
Mansfield
Nottinghamshire
NG18 4RG
T: 01623 637 119 (Planning Enquiries)
E: planningconsultation@coal.gov.uk
W: www.gov.uk/coalauthority

For the attention of: Mr J Jones – Environmental Advisor
The Planning Inspectorate

[By email: salinaehydrogenstorage@planninginspectorate.gov.uk]

Our ref: ENSIP-43

27th March 2026

Dear Mr Jones

Re: Salinae Hydrogen Storage Project EIA Notification

Thank you for your notification of the 13th March 2026 seeking the views of the Coal Authority on the above.

The Coal Authority, now trading as the Mining Remediation Authority, is a non-departmental public body sponsored by the Department for Energy Security and Net Zero. As a statutory consultee, the Coal Authority has a duty to respond to planning applications and development plans in order to protect the public and the environment in mining areas.

We have reviewed the coal mining data we hold against the site proposed for the Salinae Hydrogen Storage project. I can confirm that based on the information provided, including the red line boundary, the project does not lie within the defined coalfield. On this basis we have no comments to make on this proposal or the ES scoping process for the project.

If you would like to discuss this matter further please do not hesitate to contact me.

Yours sincerely

Melanie Lindsley

Melanie Lindsley *BA (Hons), DipEH, DipURP, MA, PGCertUD, PGCertSP, MRTPI*
Principal Planning & Development Manager

Disclaimer

The above consultation response is provided by the Coal Authority as a statutory consultee and is based upon the latest available data and the electronic consultation records held by the Coal Authority since 1 April 2013. The comments made are also based on the information provided to the Coal Authority or information that has been published for consultation purposes in relation to this specific project. The views and conclusions contained in this response may be subject to review and amendment by the Coal Authority if additional or new data/information (such as a revised Coal Mining Risk Assessment) is provided by the applicant/developer for consultation purposes.

From: [redacted]
To: Salinae Hydrogen Storage
Subject: EN0310002 - Trafford Council Consultation Response
Date: 25 March 2026 16:22:47
Attachments: image001.jpg

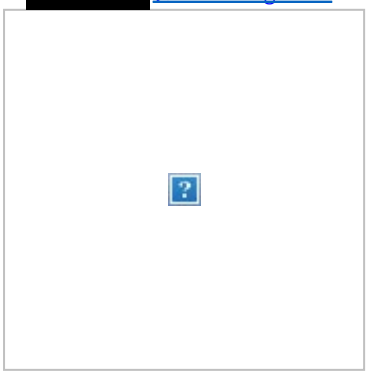
> You don't often get email from [redacted]@trafford.gov.uk. Learn why this is important

To whom it my concern

I can confirm that Trafford Council have no comments to make on the above referenced NSIP.

Kind regards

Sarah Lowes
Acting Head of Development Management/ Major Planning Projects Manager
Planning and Development
Place Directorate
Trafford Council |Trafford Town Hall | Talbot Road |Stretford |M32 0TH
T. Direct Dial [redacted]
E. [redacted]@trafford.gov.uk



UK Health Security Agency

Environmental Hazards and Emergencies Department
Seaton House, City Link
London Road
Nottingham, NG2 4LA

nsipconsultations@ukhsa.gov.uk
www.gov.uk/ukhsa

Your Ref: EN0310002
Our Ref: 94706 CIRIS

Ms Hannah Terry
Senior Environmental Advisor
Planning Inspectorate
c/o QUADIENT
69 Buckingham Avenue
Slough SL1 4PN

10 April 2026

Dear Ms Terry

Nationally Significant Infrastructure Project
Salinae Hydrogen Storage Project
Scoping Consultation Stage

Thank you for including the UK Health Security Agency (UKHSA) in the scoping consultation phase of the above application. ***Please note that we request views from the Office for Health Improvement and Disparities (OHID) and the response provided below is sent on behalf of both UKHSA and OHID.*** The response is impartial and independent.

The health of an individual or a population is the result of a complex interaction of a wide range of different determinants of health, from an individual's genetic make-up to lifestyles and behaviours, and the communities, local economy, built and natural environments to global ecosystem trends. All developments will have some effect on the determinants of health, which in turn will influence the health and wellbeing of the general population, vulnerable groups and individual people. Although assessing impacts on health beyond direct effects from for example emissions to air or road traffic incidents is complex, there is a need to ensure a proportionate assessment focused on an application's significant effects.

Having considered the submitted scoping report we make the following comments:

Environmental Public Health
We recognise the promoter's proposal to include a health section. We believe the summation of relevant issues into a specific section of the report provides a focus which ensures that public health is given adequate consideration. The section should summarise key

information, risk assessments, proposed mitigation measures, conclusions and residual impacts relating to human health. Compliance with the requirements of National Policy Statements and relevant guidance and standards should also be highlighted.

In terms of the level of detail to be included in an ES, we recognise that the differing nature of projects is such that their impacts will vary. UKHSA and OHID's predecessor organisation Public Health England produced an advice document *Advice on the content of Environmental Statements accompanying an application under the NSIP Regime*', setting out aspects to be addressed within the Environmental Statement[1]. This advice document and its recommendations are still valid and should be considered when preparing an ES. Please note that where impacts relating to health and/or further assessments are scoped out, promoters should fully explain and justify this within the submitted documentation.

Our position is that pollutants associated with road traffic or combustion, particularly particulate matter and oxides of nitrogen are non-threshold; i.e., an exposed population is likely to be subject to potential harm at any level and that reducing public exposure to non-threshold pollutants (such as particulate matter and nitrogen dioxide) below air quality standards will have potential public health benefits. We support approaches which minimise or mitigate public exposure to non-threshold air pollutants, address inequalities (in exposure) and maximise co-benefits (such as physical exercise). We encourage their consideration during development design, environmental and health impact assessment, and development consent.

No potential EMF health impact risk would be expected for this type of facility provided electrical infrastructure is below 132 kV. The applicant should provide a statement that explains why EMFs can be scoped out or should assess the potential public health impact of EMFs arising from any electrical equipment associated with the facility. For more information on how to carry out the assessment, please see the previously noted "A*dvice on the content of Environmental Statements accompanying an application under the NSIP Regime"* document.[1]

Yours sincerely,

On behalf of UK Health Security Agency

Please mark any correspondence for the attention of National Infrastructure Planning Administration.

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[1] https://khub.net/documents/135939561/390856715/Advice+on+the+content+of+environmental+statements+accompanying+an+application+under+the+Nationally+Significant+Infrastructure+Planning+Regime.pdf/a86b5521-46cc-98e4-4cad-f81a6c58f2e2?t=1615998516658

WARMINGHAM PARISH COUNCIL

E- mail to:- salinaehydrogenstorage@planninginspectorate.gov.uk

Subject. EN0310002 Saline Hydrogen Project

Contents:-

1. Introduction

Warmingham Parish Council has been identified by the Planning Inspectorate as a consultation body which must be consulted before adopting the Scoping Opinion.

The Planning Inspectorate ask that Warmingham Parish Council inform him/ her of the information it considers should be provided in the ES (Environmental Statement)

A deadline has been set for consultation responses by 10th April 2026 via e-mail to salinaehydrogenstorage@planninginspectorate.gov.uk

The application was submitted to the planning inspectorate on 3rd March 2026

These proposals were discussed at Warmingham Parish Council on Wednesday 17th March 2026. Their comments are as follows:-

2. Comment A. On Scoping Report - Appendix A Figures (report 22 pages)

The plan Figure 1.1 “The Site” Site boundary is incorrect as it incorporates on the South Eastern corner land in private ownership being part of the field to the South of the River Wheelock.

The plan should be redrawn excluding this area as it is misleading and suggests that the overall area of the Scoping Report is larger than it actually is.

The plan figure 2.1 Indicative Layout dated 10th November 2025 titled H2 Storage Surface Plant - Indicative Layout of the proposed development.

The plan shows coloured bright green an area for the Gas Processing Plant and Hydrogen Storage Production Plant.

The proposed development of these facilities includes the construction and operation of a gas (hydrogen) processing plant as part of the Hydrogen Storage facility and Hydrogen Production Plant and includes maximum 18 metre high buildings and a maximum 50 metre high ground flare.

These constructions are located on the high ground close to the Village of Warmingham. They will form a dominant feature and eyesore in the rural area.They will be visible from the village which is a designated conservation area. Visible from St Leonards Church, a grade ll*listed building, visible from Church Farm House a gradell* listed building. Visible from Warmingham Grange a Georgian former vicarage and from properties along Forge Mill Lane WArmingham.

We consider the location of these facilities to be in totally the wrong place and would suggest that they are located futher away from the village in the area of the Western Cavern plot where they will not form a visual intrusion. Access to this area is commented upon in our Comment B Proposals. Later in this report.

2. Comment B

On the 134 page report on Salinae Hydrogen Storage Project prepared by Atkins Re`alis dated March 2026 on behalf of Uniper.

References in this report are enumerated based upon the above report by Atkins Re`alis.

1.4.4 “ A transport chapter has not been included within the Scoping Report - a stand alone Transport Assessment report and travel plan will be prepared to support the DCO application. Transport movements associated with the proposed development have the potential to give rise to a range of secondary environmental effects”

Comment

We consider that a transport plan is essential at this stage and should be included in the Scoping report, without a transport plan the development could not take place, (ie) how will materials and construction get to the site, how will Hydrogen gas get to and from the site?

(a). The current access to the site is through the village of Warmingham, a small linear village of approximately 80 properties, including outlying farms and including a school of approximately 100 pupils. Access is along School lane, with restrictions along Warmingham Road.

(b). No reference has been made to the weight limit restriction of 18 Tonnes on the bridge on Warmingham Road over the river Wheelock, where heavy traffic is precluded from accessing the site from the South.

(c). Traffic traveling from the direction of Crewe is restricted to this weight limit and therefore any heavy equipment over 18 Tonnes must pass through the village along School lane.

(d). The turning for vehicles approaching via Warmingham Road from the South is very restricted and it is not possible for long or large vehicles or articulated vehicles to turn into the access track from this direction.

(e). The existing access to the brine fields is very narrow with a “Pinch Point” Between the Bears Paw Public House and Hill Top Cottage of only 16 feet (4.9 metres)

(f). The bridge along the access track over the river Wheelock has a sleeper base and is considered not to be strong enough to take the weights of heavy construction traffic and drilling rigs.

(g).In the past large construction vehicles have had difficulty in negotiating the bend on School Lane by Cornwell Close.

Proposal

1. As a parish Council we have made previous proposals that a new access to the site should be taken from the main Nantwich/Middlewich road A530 from a point by the railway bridge at Wimboldsley running parallel to the railway and following the existing drive to Park Hall Farm and Park House Farm linking into the site near to the additional proposed 9 boreholes.
2. The existing access could remain as an emergency access.

3. From an Environmental and Safety point of view it is considered unacceptable that such a large industrial and potentially hazardous site, together with the proposed Hydrogen Storage proposals of this Scoping Report should only have one narrow access point.

4. At present and in the future what if, in the event of an emergency, the present access is blocked, how would emergency vehicles (ie) fire ,police, etc reach the site?

The site 2.2

2.2.1 Appendix A figure 1.1 and insert 1.1

Comment

See our previous comment above under Comment A regarding incorrect plan boundary.

2.5 Construction
Site access and construction traffic.

See above comments a-g regarding the existing access.

The report states " and a private site access road which leads off Warmingham Road (C road) from the village of Warmingham.

Comment

This is incorrect, the access is off School Lane and not Warmingham Road.

Drilling of the wells 2.5.10

" The drilling rig would operate 24hours a day 7 days a week until the well is drilled to the target salt layer, this is estimated to take approximately 3 months per well"

Comment

The drilling by British Salt of the new wells 1 and 2 during late 2025 and early 2026 has been 24/7. This has caused extensive disturbance and annoyance to residents in the village up to 3/4 mile from the drilling rig in terms of both noise and light pollution.

Residents have reported disturbance, particularly at night from the noise of the drilling operations and from lights on the rig shining towards their properties.

WE would recommend that drilling is restricted to a time period of 8am to 6pm Monday to Friday and 8am to noon on a Saturday with no drilling on a Sunday. (These time periods have been imposed on other developments in the area by Cheshire East Council).

Pipelines 2.5.20

" It is anticipated that the Hydrogen would be delivered from the LCHPP (Low Carbon Hydrogen Production Plant) and/or via a dedicated pipeline subject to a separate third party consent"

Comment

We understand that the existing natural gas pipelines to and from the site and which criss cross the wider area are not suitable for the transport of Hydrogen Gas.

The report indicates that these new pipelines would be delivered via a connecting pipework developer to connect into. 2.5.22

Without the connecting pipelines to deliver to and from the proposed Hydrogen Storage Facility the project would not be able to operate.

We consider that the pipeline network is an integral part of the development as a whole and details of the pipelines should form part of the Scoping report.

Gas Processing Plant 2.5.24

"A processing area comprising a gas processing plant would be constructed on the Eastern cavern plot covering an area of 68 hectares ….. including a new 33kv Sub Station. The Gas processing plant would contain buildings for control, administration and personal welfare, a security gatehouse parking and equipment housing for compressors and metering equipment"

Comment

The proposal is for buildings with a maximum height of 18 metres, dehydration vessels of 15 metres and ground flare of 50 metres.

According to the plan 2-2. (Indicative layout November 2025)
As referred to in our Comment A above the plan shows coloured bright green An area for the gas processing plant and hydrogen production plant.

See our previous comments regarding visual intrusion and relocation of these facilities.

Site access and construction traffic 2.6.2 and 2.6.3

" The suitability of the route will be futher reviewed during design development and confirmed at the E.S. stage (Environmental Statement)"

"A maximum of 30 two way movements per day with limited HGV movements (maximum 3 per day and occasional maintenance periods"

Comment

We consider that access should form part of the Scoping Report because of our concerns as set out above CommentsB (a-g) and proposals (1-4)

The proposed number of movements along narrow country lanes and through Warmingham Village is going to cause noise,disturbance and have a considerable environmental impact on the residents. We strongly recommend that our proposal for an alternative access to the site off the A530 is given maximum consideration as part of the Scoping Report.

4. Conclusion and summary

As a small Parish Council we are not opposing a project of such National importance We are aware that the unique position of the underlying salt strata in Warmingham makes the location of the existing and proposed development of significance for future energy storage and distribution.

We do however wish to mitigate the effect and affect the any such development will have on the Village and residents of Warmingham in the form of Transportation,Access,Visual intrusion,noise,pipelines and environmental factors.

James Richardson (Chairman of Warmingham Parish Council)

Report prepared by Robert Newton.(Councillor Warmingham Parish Council)
(E mail- [redacted])

From: [redacted]
To: Salinae Hydrogen Storage
Cc: [redacted]
Subject: RE: EN0310002 Salinae Hydrogen Storage Project EIA Notification
Date: 20 March 2026 08:00:23
Attachments: image001.png
image002.png
image003.png
image004.png
image005.png
image006.jpg

> You don't often get email from [redacted]@warrington.gov.uk. Learn why this is important

Dear Joseph.

Warrington Borough Council has no comments to make at this stage.

Regards,

Matt

Matthew Carney
Major Applications Team Leader
Development Management
Place Directorate

Development Management
East annexe
Town Hall
Sankey Street
Warrington WA1 1UH

T: [redacted]
E: [redacted]@warrington.gov.uk
www.warrington.gov.uk

My working pattern is Monday – Thursday

From: Salinae Hydrogen Storage <salinaehydrogenstorage@planninginspectorate.gov.uk>
Sent: 13 March 2026 10:05
Subject: EN0310002 Salinae Hydrogen Storage Project EIA Notification

> You don't often get email from salinaehydrogenstorage@planninginspectorate.gov.uk. Learn why this is important

FAO Head of Planning

Dear Sir/Madam

Please see attached correspondence on the proposed Salinae Hydrogen Storage Project.

The Applicant for the Proposed Development intends to make an application for Development Consent under the Planning Act 2008. The Applicant has sought a Scoping Opinion from the Planning Inspectorate, on behalf of the Secretary of State, as to the scope and level of detail of the information to be provided within the Environmental Statement that will accompany its future application.

The Planning Inspectorate has identified you as a consultation body to inform the Scoping Opinion and is therefore inviting you to submit comments by **10 April 2026**. The deadline is a statutory requirement that cannot be extended.

Further information is included within the attached letter.

Kind regards,

Joseph Jones

Joseph Jones
Environmental Advisor
The Planning Inspectorate

@PINSgov The Planning Inspectorate planninginspectorate.gov.uk

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necessary checks.

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DPC:76616c646f72

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