



Planning Inspectorate
Arolygiaeth Gynllunio

SCOPING OPINION:

Proposed Peak Cluster CCS Pipeline

Case Reference: EN0710001

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

19 February 2026

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1. INTRODUCTION

1.0.1 On 12 January 2026, the Planning Inspectorate (the Inspectorate) received an application for a Scoping Opinion from Peak Cluster Ltd (the applicant) under regulation 10 of The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (The EIA Regulations) for the proposed Peak Cluster CCS Pipeline (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:

[Documents Peak Cluster CCS Pipeline](#)

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.

1.0.3 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 Scoping 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.

1.0.4 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.

1.0.5 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.

1.0.6 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'](#)

- 1.0.7 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

(Scoping Report Section 3)

ID	Ref	Description	Inspectorate's comments
21.1	Paragraph 3.2.8	Technology for carbon capture	The Scoping Report states that the final technology to be implemented for the Breedon capture facility has not been finalised. A range of options are being investigated. The technology to be implemented should be described and evaluated in the ES.
212	Paragraph 3.2.106	Dimensions of infrastructure	The Scoping Report states that the footprint required for a Block Value Station (BVS) is approximately 1,500m² to 2,500 m² and for an Above Ground Installation (AGI) the necessary footprint ranges 5,000m² to 15,000m² but does not provide further parameters such as the height. It is noted that the proposed development may require new substations to be built. The applicant should be aware that the description of the proposed development provided in the ES must be sufficiently certain to meet the requirements of the EIA Regulations. It should refer to the design, size and locations of each built element, including maximum heights, design parameters and limits of deviation. The description should be supported (as necessary) by figures, cross sections and drawings which should be clearly and appropriately referenced.
21.3	n/a	Assessment of impacts from AGIs	Potential impacts of the AGIs have only been included in the Scoping Report with regards to landscape impacts. The Inspectorate considers that the ES should assess the potential for impacts from the AGIs and BVS on all other relevant aspects such as biodiversity, historic environment, water environment. Consideration of decommissioning impact, such as waste due to removal of AGI/BVS should be included.

ID	Ref	Description	Inspectorate's comments
214	Paragraphs 3.4.19 and 4.3.3	Final design	The Scoping Report explains that the final design of the proposed development is not yet confirmed. The exact locations of permanent and temporary AGI's and BVS are not yet known. There is also the potential for 'associated development' which has not been explained or confirmed. The ES should seek to finalise the locations of all project components where possible. The ES should provide details of the final locations of all components of the proposed development and ensure that an assessment of the worst case scenario from the siting of AGI's and BSVs has been included for all aspect areas. The Scoping Report states that the AGI's and BVS's are expected to be located within the current red line boundary. Where changes are made from the scoping boundary to the draft Development Consent Order (dDCO) boundary, such as increase or reduction in extent, the changes should be explained and justified in the ES. Where changes are made, each aspect chapter should explain the effect of such changes on the approach to assessment, including if additional matters need to be scoped into the assessment.
215	Paragraph 3.2.141	Depth of pipeline installation	The ES should describe the range of depths that have been considered as part of the assessment and the degree of confidence in those parameters. Parameters should be established based on a worst case scenario to determine likely significant effects.
216	Paragraphs 3.2.91 and 3.2.92	Maintenance activities	The Scoping Report describes the inspection and maintenance activities which would take place during the operational phase. Paragraph 3.2.92 states that "any defects or issues identified during inspections will be addressed through appropriate remedial actions". The ES should provide details on what remedial actions would include, for example, excavation of the pipeline.
217	Paragraph 3.2.133	Potential block valve	The Scoping Report explains that a block valve may be required at some point between the landfall and MLWS. This may require piling, and the exact location is yet to be finalised. The ES should assess the potential for likely significant effects from installation of this block valve on ecological receptors, such as benthic species, marine mammals, fish

ID	Ref	Description	Inspectorate's comments
			and bird species which use the intertidal area. Potential impacts on water quality should also be assessed.
218	Paragraphs 3.4.19 and 3.2.140	Compounds	The ES should provide details of the number, size and dimensions of construction compounds which will be required for the proposed development. The impact on all relevant aspects such as landscape should be assessed where significant effects may occur. The locations of all construction compounds should be identified on supporting plans. Likewise, the Scoping Report explains that an operational compound may be required, and the ES should ensure that likely significant effects as a result of this are assessed.
219	Paragraph 12.1.3	Maintenance dredging	The Scoping Report highlights a potential need for dredging during maintenance but no further details are provided. The ES should assess the potential for likely significant effects from maintenance dredging on ecological receptors, such as benthic species, fish, and marine mammals. Potential for likely significant effects on water quality should also be assessed. The ES should explain the locations and extent of any dredging required as part of the proposed development. Figures should be provided to aid understanding. The ES should also provide information regarding volumes of dredged materials and explain how dredged materials will be disposed of, including the handling of any contaminated dredged materials.
21.10	Figure 7.4b to 7.4e	Proposed stack location	Figures 7.4b to 7.4e identify locations for proposed stacks. The Scoping Report only identifies a new stack at the Coastal AGI. Other stacks referred to are existing cement flue stacks at existing plants. The ES should differentiate between proposed and existing stacks. The project description should be clear regarding the need for new stacks and should also provide details on stack dimensions which should inform assessments such as landscape, biodiversity and air quality. The inclusion of photomontages would aid understanding of potential impacts.
21.11	n/a	Access to agricultural land	The ES should assess any potential impacts on farming and movement of livestock from road closures and diversions.

ID	Ref	Description	Inspectorate's comments
21.12	n/a	Delineation between marine and onshore study area	The ES should clearly explain which activities assessed fall within which defined area (marine or onshore) and the terms consistently used throughout the ES. Where aspect assessments cross between marine and onshore areas, it should be clear where the assessment for the intertidal area can be found to avoid gaps in the assessment. This should be supported by figures at an appropriate scale. The ES should clearly explain the approach of using one or two pipelines in the landfall to MLWS area.
21.13	n/a	Decommissioning	The Scoping Report states that a Decommissioning Environmental Management Plan (DEMP) will be developed at a later date and which would be in accordance with guidelines and regulations in place at that time. Whilst this is understood, it is considered that the ES should provide a description of the activities and works (including the anticipated duration) which are likely to be required during decommissioning. The ES should be clear as to how decommissioning will be assessed overall for the proposed development as well as on an aspect-by aspect basis. The ES should provide clarification regarding which elements may be removed or left in situ. Most aspects chapters state the pipeline will be left in situ, however, paragraph 12.5.12 states the “pipeline would likely remain in situ”. Where the approach is taken that effects during decommissioning would be similar to those expected during construction, the ES should set out how a change in baseline, due to the number of years passed since the proposed development was constructed and how this would be taken into account.

2.2 EIA Methodology and Scope of Assessment

(Scoping Report Section 4)

ID	Ref	Description	Inspectorate's comments
221	Section 3.4	Design evolution and alternatives	As the final design and locations of elements of the proposed development are not yet confirmed the ES should explain how the design of the proposed development has been evolved in response to environmental constraints and feedback from relevant consultation bodies. The ES should demonstrate how the final design has applied the mitigation hierarchy.
222	n/a	Avoidance and mitigation	The ES should clearly describe the details of any necessary avoidance and mitigation measures to be implemented, along with monitoring, reporting, and adaptive management procedures. These should be agreed, if possible, with relevant stakeholders and the ES should explain how they would be secured.
223	n/a	Legibility of Figures	The Inspectorate notes that there are a number of figures, which due to scale, are difficult to interpret and it is not possible to read place names (for example plate 3-7 of Volume 1). The ES should ensure that all figures are clear and legible in order for the information provided in them to be easily interpreted.
224	n/a	Study areas	The final study area is not yet defined or represented on figures for a number of aspect chapters (for example, physical processes). The ES should provide detailed justification of the study areas applied, supported by evidence of the likely extent of impacts identified from the proposed development. Where the study area is informed by a Zone of Influence (ZOI), the approach to establishing the ZOI should be clearly described.

ID	Ref	Description	Inspectorate's comments
			Effort should be made to agree study areas and relevant sensitive receptors with relevant consultation bodies.
225	n/a	Heat	The ES should provide an assessment of potential impacts arising from the pipeline resulting from heat. Heat from the pipeline may affect land, groundwater and surface water. The applicant's attention is directed to comments from the Environment Agency in Appendix 2 to the Scoping Opinion.
226	n/a	Glossary	Not all abbreviations used in the Scoping Report are included in the glossary, such as Habitat Assessment (HAS) and Environmental Baseline Survey (EBS). The ES should ensure that all abbreviations are captured in the glossary.
227	Appendix C	Transboundary effects	The Inspectorate notes that the applicant has supplied a transboundary screening matrix (Table C-1 of Scoping Report Appendix C). The Inspectorate has an ongoing duty in relation to consideration of transboundary effects and will undertake a separate transboundary screening exercise on behalf of the SoS under Regulation 32 of the EIA Regulations following adoption of the Scoping Opinion. The Inspectorate recommends that where Regulation 32 applies, the ES should identify whether the proposed development has the potential for significant transboundary effects and if so, what these are, and which EEA States would be affected.

3. ENVIRONMENTAL ASPECT COMMENTS

3.1 Air quality

(Scoping Report Section 5)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.1.1	Tables 5-10 to 5-12	Dust emissions (operation)	The Scoping Report proposes to scope out dust emissions from the capture facilities, Peak Cluster Pipeline and Coastal AGI to Mean Low Water Springs (MLWS) Pipeline on the basis that operational activities are not anticipated to generate dust. The Inspectorate is content that the level of dust generated during operation is unlikely to result in a significant effect and therefore this matter can be scoped out of the assessment.
3.1.2	Tables 5-10 to 5-12	Dust emissions (decommissioning)	The Scoping Report proposes to scope out dust emissions from the capture facilities, Peak Cluster Pipeline and Coastal AGI to MLWS Pipeline during decommissioning on the basis that these impacts will be assessed at the time of decommissioning. The Inspectorate directs the applicant to comments in ID 2.1.13 of this Opinion, regarding decommissioning which should be addressed in the ES in relation to decommissioning and therefore does not agree to scope out this matter on the information provided.
3.1.3	Tables 5-10 to 5-12	Vehicle movements – (operation and decommissioning)	The Scoping Report proposes to scope out air quality impacts from vehicle movements from all elements of the proposed development on the basis that operational traffic effects are expected to be negligible. On this basis, the Inspectorate is content that operational effects can be scoped out of the ES. However, the ES should confirm the operational vehicle types and numbers (with reference to thresholds within guidance) to justify this position.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			With regards to decommissioning, the Inspectorate directs the applicant to comments in ID 2.1.13 which should be addressed in the ES in relation to decommissioning and therefore does not agree to scope out this matter on the information currently provided
31.4	Table 5-10	Emissions from the capture facilities (construction and decommissioning)	The Scoping Report proposes to scope out operational emissions from the capture facilities during construction and decommissioning. As there is no pathway from effect during these phases, the Inspectorate agrees this may be scoped out of the ES.
31.5	Tables 5-11 and 5-12	Operational emission (all phases)	The Scoping Report proposes to scope out operational emissions from the Peak Cluster Pipeline and Coastal AGI to MLWS Pipeline for all project phases as no operational emissions are anticipated from these project elements. The Inspectorate agrees operational emissions during construction and decommissioning can be scoped out due to absence of pathway for effect.

ID	Ref	Description	Inspectorate's comments
31.6	Tables 5-10 and 5-12	Scope	The Inspectorate notes that operational dust emissions from capture facilities and the Coastal AGI to MLWS Pipeline are recorded as "not applicable" in Tables 5-10, 5-11 and 5-12, the Inspectorate assumes these matters are to be scoped out, but the ES should be consistent in aspect chapters to avoid ambiguity.
31.7	Paragraph 5.4.2	Baseline	The applicant's attention is drawn to the comments from Wirral Council at Appendix 2 of this Scoping Opinion regarding the validity of using the Annual Status Report (ASR) to establish a baseline level for air quality for the proposed development.

ID	Ref	Description	Inspectorate's comments
3.1.8	Paragraphs 5.3.4 and 5.4.4	Location of receptors	The ES should be accompanied by an appropriate plan illustrating the location of sensitive air quality receptors within the study area of the proposed development to aid understanding of the extent of effects.
3.1.9	Paragraph 5.8.1	Emission Limit Values (ELVs)	The applicant's attention is drawn to the comments from Natural England at Appendix 2 of this Scoping Opinion regarding the approach to addressing ELVs as part of the permitting process.
3.1.10	n/a	Emissions from AGIs	It is noted that the Coastal AGI will include a stack of up to 50m high, however the Scoping Report does not explain what this is required for or what emissions it will emit. In the absence of information, the Inspectorate does not agree to scope this matter out for the operational phase at this stage. The ES should consider impacts from the Coastal AGI stack, and other new stacks required, on human and ecological receptors. The applicant's attention is directed to comments from Wirral Council at Appendix 2 of this Scoping Opinion.
3.1.11	n/a	Amines	The applicant's attention is drawn to the comments from Natural England at Appendix 2 of this Scoping Opinion regarding the need to assess emissions from the use of amine solvents in the air quality assessment.
3.1.12	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.

3.2 Biodiversity

(Scoping Report Section 6)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
321	Paragraph 6.1.2	Marine biodiversity	Marine biodiversity is proposed to be scoped out of the biodiversity chapter and instead will be assessed in the Marine Environment chapter. On this basis, the Inspectorate agrees that marine biodiversity may be scoped out of the biodiversity chapter of the ES.
322	Table 6-10 and Table 6-11	Marine ecology	The Scoping Report seeks to scope out impacts on marine ecology from the capture facilities and from the pipeline to the Coastal AGI as these do not interact with the marine environment. The Inspectorate agrees that marine ecology in relation to the capture facilities and the pipeline to the Coastal AGI may be scoped out of the ES.

ID	Ref	Description	Inspectorate's comments
323	Paragraph 6.3.2	Study area	The Scoping Report explains that the assessment will initially consider features within a potential ZOI of up to 15km, noting that this may be subject to change as the detailed design progresses. The ES should explain how the final study areas for statutory and non-statutory designated sites and species has been established, taking into account that potential impacts may be experienced at distances beyond 15km and including use of relevant industry guidance.
324	Section 6.4 and	Baseline surveys	It is noted that at this stage, no field surveys have been undertaken. The Inspectorate considers that the ES should clearly show the extent of survey coverage, with use of maps and figures. The assessment should be based on robust survey data and any limitations

ID	Ref	Description	Inspectorate's comments
	paragraph 6.7.2		such as access to land should be explained. The Inspectorate notes that wintering bird surveys commenced in October 2025 and will use data from Webs counts until April 2026, the applicant should be mindful that to provide a robust baseline it may be necessary to undertake two seasons of wintering bird surveys.
325	Section 6.5 and Appendix E	Aquatic ecology gap analysis	The gap analysis provided in Appendix E shows where data is available from surveys undertaken in the last ten years, where data was collected prior to 2015, and where no data is available. The ES should explain the limitations experienced in collating data to inform the aquatic ecology assessment. The ES should include up to date surveys in order to ensure a robust assessment. To note, the Scoping Report refers incorrectly to the aquatic ecology gap analysis being Appendix F rather than Appendix E. The ES should ensure that the main text and figures/appendices are consistent.
326	Paragraph 6.5.8	Surveys for notable species	The Scoping Report refers to white clawed crayfish but only in regards to potential effects from signal crayfish. It is not clear whether white clawed crayfish are present in the study area. The ES should provide details of desk-based studies used to inform presence/absence of this species and provide an assessment where significant effects are likely.
327	Paragraph 6.8.8 and Table 6-13	Surveys for amphibians	The Scoping Report highlights that there are records of amphibians within 2.3km and 8.4km of the proposed development. Paragraph 6.8.8 identifies that habitat within the scoping boundary will have suitability to support protected/notable species which include amphibians. However, Table 6-13 does not include surveys for amphibians within the list of survey efforts which will be undertaken. The ES should assess the potential for impacts on amphibians from the proposed development. The study area and assessment should be agreed with relevant stakeholders where possible. Details of any necessary mitigation should be described and a method of securing the mitigation should be provided. The applicants attention to comments from Wirral Council in Appendix 2 of this Scoping Opinion regarding the presence of natterjack toad in the vicinity of the landfall AGI.

ID	Ref	Description	Inspectorate's comments
328	Appendix D	Ancient woodland and Ancient Woodland Inventory	Appendix D of the Scoping Report provides a list of a number of areas of ancient woodland which have been identified within 2km of the scoping boundary for the pipeline. It is considered that these areas should be identified on a plan in the ES. Areas of ancient woodland within 2km of the AGIs and BVSs should also be identified. Appendix D currently identifies eight areas of ancient woodland as located in the scoping boundary and a further four as being immediately adjacent. As the design of the proposed development is not yet finalised, the ES should ensure that any areas of ancient woodland subsequently identified as being located within 2km of the proposed development are listed and assessed. It should be noted that Ancient Woodland Inventories are being updated which identify areas of Ancient Woodland between 0.25ha and 2ha in size. The ES should ensure that records of Ancient Woodland in the study area are up to date.
329	Tables 6-4 to 6-7	Figures	The Scoping Report identifies and lists a number of designated sites within the selected study areas for the capture facilities, pipelines and AGIs, but has not shown the locations of these on a plan. The ES should include plans to show designated sites within agreed study areas to aid understanding of potential impacts.
3210	Section 6.5	Aquatic ecology baseline	The ES should consider the impacts to the aquatic ecology of canals in the aquatic ecology baseline. Canals should also be included in Appendix E, Aquatic ecology EA data gap analysis. The applicant's attention is directed to comments from the Canals and River Trust at Appendix 2 of this Scoping Opinion.
3211	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.

ID	Ref	Description	Inspectorate's comments
			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.
3212	n/a	Environmental data sharing	The ES should clearly describe how environmental data collected in all phases will be shared with the relevant Local Environmental Records Centres and any relevant environmental recording schemes

3.3 Landscape and visual

(Scoping Report Section 7)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
331	Paragraph 7.4.8 Table 7-23 Table 7-24	The Clwydian Range and Dee Valley National Landscape (all phases)	The Scoping Report seeks to scope out temporary and permanent effects during all phases on the Clwydian Range and Dee Valley National Landscape on the basis that it is approximately 13.5km south west of the Coastal AGI and therefore impacts on the National Landscape are unlikely. The Inspectorate agrees this may be scoped out of the ES.
332	Paragraph 7.4.29	Regional Landscape Character Types (RCTs) and Areas (RCAs) (all phases)	The Scoping Report seeks to scope out effects on RCTs and RCAs on the basis that the majority of the LVIA study area is not covered by RCTS and RCAs. The ES will use National Character Areas and landscape character assessments to assess likely significant effects from the proposed development. On this basis, the Inspectorate agrees that RCTs and RCAs may be scoped out of the ES.
333	Table 7-18	Temporary effects to landscape character (operation)	The Scoping Report seeks to scope out temporary effects on landscape character during operation from the capture facilities on the basis that works would occur within the existing operational boundary. On this basis, the Inspectorate agrees this may be scoped out of the ES.
334	Table 7-19 Table 7-20 Table 7-24 and	Temporary effects to landscape character (operation)	The Scoping Report seeks to scope out temporary effects on landscape character during operation from: • North feeder AGI • Central Feeder AGI, Connection AGI 1, Connection AGI 2 and AGI 3 • Coastal AGI

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
	paragraph 7.5.1		The Scoping Report explains that temporary effects would only occur in the construction phase. On this basis the Inspectorate agrees this may be scoped out.
335	Table 7-21 Table 7-22 Table 7-23 and paragraph 7.5.1	Temporary effects to landscape character (operation and decommissioning)	The Scoping Report seeks to scope out temporary effects on landscape character during operation and decommissioning from: • Peak Cluster Pipeline (central) • Peak Cluster Pipeline (East) • Peak Cluster Pipeline (West) and Coastal AGI to MLWS Pipeline(s) The Scoping Report explains that temporary effects would only occur in the construction phase. On this basis the Inspectorate agrees this may be scoped out for operation and decommissioning.
336	Table 7-18 Table 7-19 Table 7-20 Table 7-24	Long term effects on landscape character (construction and decommissioning)	The Scoping Report seeks to scope out effects on landscape character during construction and decommissioning from: • Capture facilities • North Feeder AGI • Central Feeder AGI, Connection AGI 1 and Connection AGI 2 and AGI 3 • Coastal AGI The Inspectorate considers that long term effects will not occur during the construction phase and therefore this may be scoped out. The Scoping Report does not provide a justification as to why this matter can be scoped out during decommissioning. The Inspectorate directs the applicant to comments in ID 2.1.12 which should be addressed in the ES in relation to decommissioning and therefore does not agree to scope out this matter on the information provided.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
337	Table 7-21 Table 7-22 Table 7-23	Long term effects on landscape character (all phases)	The Scoping Report seeks to scope out long term effects on landscape character during all phases from: • Peak Cluster Pipeline (Central) • Peak Cluster Pipeline (East) • Peak Cluster Pipeline (West) and Coastal AGI to MLWS Pipeline(s) The Inspectorate considers that long term effects will not occur during the construction phase and therefore this may be scoped out. The Scoping Report explains that as the pipeline would be buried during operation and remain in situ during decommissioning, significant long term effects are unlikely to occur. It also states that the landscape would be returned to the existing baseline. The Inspectorate does not agree to scoping this out for the operational phase. The Inspectorate considers that the ES should address the potential for long term effects on landscape character due to loss of the existing landscape such as woodland, specimen trees and those which may occur as a result of planting restrictions introduced for any easement required. The Inspectorate directs the applicant to comments in ID 2.1.13 which should be addressed in the ES in relation to decommissioning and therefore does not agree to scope out this matter on the information provided.
338	Table 7-18 Table 7-19 Table 7-20 Table 7-24	Temporary effects on the Landscape Character Areas (LCAs) within the LVIA study area (operation)	The Scoping Report seeks to scope out temporary effects on the LCA within the LVIA study area during operation from: • The capture facilities • North Feeder AGI • Central Feeder AGI, Connection AGI 1 and Connection AGI 2 and AGI 3

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			Coastal AGI On the basis that temporary effects would be experienced during the construction and decommissioning phases, the Inspectorate agrees this may be scoped out for the operational phase.
33.9	Table 7-21 Table 7-22 Table 7-23 and paragraph 7.5.1	Temporary effects on the LCA within the LVIA study area (operation and decommissioning)	The Scoping Report seeks to scope out temporary effects on the LCA within the LVIA study area during operation and decommissioning from: - Peak Cluster Pipeline (Central) - Peak Cluster Pipeline (East) - Peak Cluster Pipeline (West) and Coastal AGI to MLWS Pipeline(s) The Scoping Report explains that temporary effects would only occur in the construction phase. On this basis the Inspectorate agrees this may be scoped out for operation and decommissioning
33.10	Table 7-18 Table 7-19 Table 7-20 Table 7-24	Long term effects on the LCA within the LVIA study area (construction and decommissioning)	The Scoping Report seeks to scope out long term effects on the LCA within the LVIA study area effects on landscape character during operation and decommissioning from: - The capture facilities - North Feeder AGI - Central Feeder AGI, Connection AGI 1 and Connection AGI 2 and AGI 3 - Coastal AGI The Inspectorate considers that long term effects will not occur during the construction phase and therefore this may be scoped out. The Scoping Report does not provide sufficient detail for the decommissioning phase regarding any reinstatement which would occur. The Inspectorate directs the applicant to

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			comments in ID 2.1.13 which should be addressed in the ES in relation to decommissioning and therefore does not agree to scope out this matter on the information provided.
33.11	Table 7-21 Table 7-22 Table 7-23	Long term effects on the LCA within the LVIA study area (all phases)	The Scoping Report seeks to scope out long term effects on the LCA within the LVIA study area during all phases from: • Peak Cluster Pipeline (Central) • Peak Cluster Pipeline (East) • Peak Cluster Pipeline (West) and Coastal AGI to MLWS Pipeline(s) The Inspectorate considers that long term effects will not occur during the construction phase and therefore this may be scoped out. The Scoping Report explains that as the pipeline would be buried during operation and remain in situ during decommissioning, significant long term effects are unlikely to occur. It also states that the landscape would be returned to the existing baseline. The Inspectorate does not agree to scoping this out for the operational phase. The Inspectorate considers that the ES should address the potential for long term effects on landscape character due to loss of the existing landscape such as woodland, specimen trees and those which may occur as a result of planting restrictions introduced for any easement required. The Inspectorate directs the applicant to comments in ID 2.1.12 which should be addressed in the ES in relation to decommissioning and therefore does not agree to scope out this matter on the information provided.
33.12	Table 7-18 Table 7-19 and	Temporary effects on the statutory purposes and special landscape qualities of	The Scoping Report seeks to scope out temporary effects on the statutory purposes and special landscape qualities of the PDNP and its setting effects on landscape character during operation from:

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
	paragraph 7.5.1	the Peak District National Park (PDNP) and its setting (operation)	• The capture facilities • North Feeder AGI On the basis that temporary effects would be experienced during the construction phase, the Inspectorate agrees this may be scoped out for the operational phase.
33.13	Table 7-20 Table 7-21 Table 7-22 Table 7-23 Table 7-24 And paragraph 7.5.1	Temporary effects on the statutory purposes and special landscape qualities of the PDNP and its setting (all phases)	The Scoping Report seeks to scope out temporary effects on the statutory purposes and special landscape qualities of the PDNP and its setting during all phases from: • Central Feeder AGI, Connection AGI 1 and Connection AGI 2 and AGI 3 • Peak Cluster Pipeline (Central) • Peak Cluster Pipeline (East) • Peak Cluster Pipeline (West) and Coastal AGI to MLWS Pipeline(s) Coastal AGI The Scoping Report states that based upon the distance from the PDNP and it's setting it is anticipated that significant effects are unlikely to occur during all phases. It is noted that Peak Cluster Pipeline (East) is located within the Peak District National Park. As such, the Inspectorate does not agree to scope out impacts from this element and the ES should include an assessment of potential temporary effects on the PDNP from all phases of the proposed development. The Inspectorate agrees that with regards to the Central Feeder AGI, Connection AGI 1 and Connection AGI 2 and AGI 3, Peak Cluster Pipeline (Central) and Peak Cluster Pipeline (West) and Coastal AGI to MLWS Pipeline(s) Coastal AGI these may be scoped out of the ES for all phases of the proposed development.
33.14	Table 7-18 Table 7-19	Permanent effects on the statutory	The Scoping Report seeks to scope out permanent effects on the statutory purposes and special landscape qualities of the PDNP during construction and decommissioning from:

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
		purposes and special landscape qualities of the PDNP and its setting (construction and decommissioning)	• Capture facilities • North Feeder AGI On the basis that permanent effects will not be experienced during construction the Inspectorate agrees to scope this out of the ES. The Inspectorate considers that the ES should address the potential for permanent effects on the statutory purposes and special landscape qualities of the PDNP and its setting due to loss of existing landscape such as woodland, specimen trees and those which may occur as a result of planting restrictions introduced for any easement required. The Inspectorate directs the applicant to comments in ID 2.1.13 which should be addressed in the ES in relation to decommissioning and therefore does not agree to scope out this matter on the information provided.
33.15	Table 7-20 Table 7-21 Table 7-22 Table 7-23 Table 7-24	Permanent effects on the statutory purposes and special landscape qualities of the PDNP and its setting (all phases)	The Scoping Report seeks to scope out permanent effects on the statutory purposes and special landscape qualities of the PDNP and its setting during construction, operation and decommissioning from: • Central Feeder AGI, Connection AGI 1 and Connection AGI 2 and AGI 3 • Peak Cluster Pipeline (Central) • Peak Cluster Pipeline (East) • Peak Cluster Pipeline (West) and Coastal AGI to MLWS Pipeline(s) • Coastal AGI The Scoping Report states that based upon the distance from the PDNP and it's setting it is anticipated that significant effects are unlikely to occur. It is noted that Peak Cluster Pipeline (East) is located within the Peak District National Park. As such, the Inspectorate

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			does not agree to scope out impacts from this element, and the ES should include an assessment of potential effects on the PDNP for all phases of the proposed development. The Inspectorate agrees that with regards to the Central Feeder AGI, Connection AGI 1 and Connection AGI 2 and AGI 3, Peak Cluster Pipeline (Central) and Peak Cluster Pipeline (West) and Coastal AGI to MLWS Pipeline(s) Coastal AGI these may be scoped out of the ES for all phases of the proposed development.
33.16	Table 7-18 Table 7-19 Table 7-20 Table 7-24	Temporary disruption to people's views and visual amenity as a result of construction of the proposed development (operation)	The Scoping Report seeks to scope out temporary disruption effects to people's views and visual amenity as a result of construction of the proposed development during operation from: • Capture facilities • North Feeder AGI • Central Feeder AGI, Connection AGI 1 and Connection AGI 2 and AGI 3 • Coastal AGI As this relates to the construction phase, the Inspectorate agrees this can be scoped out for operational phase.
33.17	Table 7-21 Table 7-22 Table 7-23	Temporary disruption to people's views and visual amenity as a result of the proposed development (operation and decommissioning)	The Scoping Report seeks to scope out temporary disruption to people's views and visual amenity as a result of the proposed development during operation and decommissioning from: • Peak Cluster Pipeline (Central) • Peak Cluster Pipeline (East) • Peak Cluster Pipeline (West) and Coastal AGI to MLWS Pipeline

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			On the basis that temporary effects will be assessed for the construction phase, and not experienced during operation and decommissioning, the Inspectorate agrees to scope this out of the ES.
33.18	Table 7-18 Table 7-19 Table 7-20 Table 7-24	Long term effects to people's views and visual amenity as a result of the existence and operation of the proposed development (construction and decommissioning)	The Scoping Report seeks to scope out long term effects people's views and visual amenity as a result of the existence and operation of the proposed development from: • Capture facilities • North Feeder AGI • Central Feeder AGI, Connection AGI 1 and Connection AGI 2 and AGI 3 • Coastal AGI The Inspectorate considers that long term effects will not occur during the construction phase and therefore this may be scoped out. The Scoping Report does not provide a justification as to why this matter can be scoped out during decommissioning. The Inspectorate directs the applicant to comments in ID 2.1.13 which should be addressed in the ES in relation to decommissioning and therefore does not agree to scope out this matter on the information provided.
33.19	Table 7-21 Table 7-22 Table 7-23	Long term effects to people's views and visual amenity as a result of the existence and operation of the proposed development (all phases)	The Scoping Report seeks to scope out long term effects to peoples views and visual amenity resulting from the existence and operation of the proposed development during all phases from: • Peak Cluster Pipeline (Central) • Peak Cluster Pipeline (East) • Peak Cluster Pipeline (West) and Coastal AGI to MLWS Pipeline The Inspectorate considers that long term effects will not occur during the construction phase and therefore this may be scoped out.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			At this stage, the Inspectorate does not agree this matter may be scoped out for the operational or decommissioning phases. The Inspectorate considers that the ES should address the potential for long term effects to people's views and visual amenity due to change in landscape and any planting restrictions introduced for any easement required, which may occur during the operational phase. The Inspectorate directs the applicant to comments in ID 2.1.12 which should be addressed in the ES in relation to decommissioning and therefore does not agree to scope out this matter on the information provided.
3320	Table 7-19 Table 7-20 and paragraphs 3.2.98 and 6.9.2	Temporary effects associated with lighting (operation)	The Scoping Report seeks to scope out temporary effects associated with lighting during operation from: • North Feeder AGI • Central Feeder AGI, Connection AGI 1 and Connection AGI 2 and AGI 3 • Coastal AGI Paragraph 3.2.98 of the Scoping Report explains that the AGI's will not be permanently lit however paragraph 6.9.2 of the Scoping Report states that mitigation for impacts to ecology may be managed by careful lighting design at AGI's, implying that lighting will be required. At this stage the Inspectorate is not able to scope this matter out. The ES should explain any lighting requirements at the AGI's (including security lighting) and provide an assessment where significant effects are likely to occur.
3321	Table 7-21 Table 7-22 Table 7-23	Temporary effects associated with lighting	The Scoping Report seeks to scope out temporary effects associated with lighting during operation and decommissioning from: • Peak Cluster Pipeline (Central) • Peak Cluster Pipeline (East)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
		(operation and decommissioning)	Peak Cluster Pipeline (West) and Coastal AGI to MLWS Pipeline As the pipeline will be underground during operation and left in situ upon decommissioning, the Inspectorate agrees these matters may be scoped out of the ES.
3322	Table 7-19 Table 7-20 Table 7-21 Table 7-22 Table 7-23 Table 7-24	Long term effects associated with lighting (all phases)	The Scoping Report seeks to scope out long term effects associated with lighting during construction, operation and decommissioning from: - North Feeder AGI - Central Feeder AGI, Connection AGI 1, Connection AGI 2 and AGI 3 - Peak Cluster Pipeline (Central) - Peak Cluster Pipeline (East) - Peak Cluster Pipeline (West) and Coastal AGI to MLWS Pipeline - Coastal AGI This is on the basis that long term effects associated with lighting are unlikely to result in a change to the existing baseline and therefore significant effects are unlikely to occur. At this stage the Inspectorate is not able to scope this matter out. The ES should explain any lighting requirements at the AGI's (including security lighting) and provide an assessment where significant effects are likely to occur.

ID	Ref	Description	Inspectorate's comments
3323	Paragraphs 7.3.7 and 7.4.86 and Table 7-5	Study area and Zone of Theoretical Visibility	Study areas related to the key elements of the proposed development are set out in Table 7-5 and it is explained that the final study area will be justified in the ES. The Scoping Report explains that at this stage, the location of ancillary buildings and structures are not yet known and therefore these elements do not form part of the current

ID	Ref	Description	Inspectorate's comments
			Zone of Theoretical Visibility. The Scoping Report states that further ZTVs will be produced to support the ES. The ES should identify any high sensitivity receptors beyond the final study areas that would have visibility of the proposed development and provide an assessment where significant effects are likely to occur. This should include consideration of visibility of external lighting at night-time.
3.324	Paragraph 7.4.14	Historic assets	The landscape and visual assessment should include historic assets (designated and non-designated) as receptors which may be affected by the proposed development. Cross reference should be made to the Historic Environment chapter of the EAS where relevant.
3.325	Section 7.5	Decommissioning	Section 7.5 summarises impacts which may be experienced in the construction and operational phases but does not include impacts which may be experienced in the decommissioning phase. It is noted that tables 7-18 to 17-24 scopes in certain impacts in the decommissioning phase and therefore it is advisable that the ES includes a summary of these impacts.
3.326	Table 7-7	Visual receptors	The ES should also include canals as visual receptors. The applicant's attention is directed to comments from the Canals and Rivers Trust at Appendix 2 to this Scoping Opinion.
3.327	Paragraphs 3.3.4, 3.2.130 and 3.2.136	Reinstatement	Paragraph 3.3.4 of the Scoping Report states that the typical construction width of the corridor is 30 to 40m and that additional width may be needed at certain crossings. Paragraph 3.2.136 of the Scoping Report states that the construction corridor width is likely to be between 50m and 100m wide. Paragraph 3.2.130 of the Scoping Report states that the area excavated to lay the underground pipeline will be reinstated to its original condition. The ES should clearly explain the working corridor width and be consistent on this description throughout. The ES should also include details on any underground works required for the proposed development and assess impacts from the excavation and

ID	Ref	Description	Inspectorate's comments
			reinstatement of trenched areas or from trenchless techniques. The Inspectorate considers that the ES should address the potential for permanent landscape effects due to any planting restrictions introduced for any easement required.

3.4 Traffic and movement

(Scoping Report Section 8)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
34.1	Tables 8-15 and 8-16	Assessment of decommissioning impacts	The Scoping Report proposes to scope out an assessment of: • severance • road vehicle driver and passenger delay • non-motorised user delay • non-motorised user amenity • fear and intimidation • road user and pedestrian safety, for all elements of the proposed development on the basis that these impacts will be assessed at the time of decommissioning. The Inspectorate directs the applicant to comments in ID 2.1.13 which should be addressed in the ES in relation to decommissioning and therefore does not agree to scope out this matter on the information provided.
34.2	Tables 8-15 and 8-16	Road safety audits (all phases)	The Scoping Report states that any new or amended access points required to serve the development to/from the public highway would be subject to a Road Safety Audit at the appropriate stage and would be considered as part of the Transport Statement. On this basis, the Inspectorate is content this matter can be scoped out of the ES.
34.3	Tables 8-15 and 8-16	Hazardous / large loads (operation and decommissioning)	The Scoping Report proposes to scope out an assessment of hazardous / large loads during operation for all project elements on the basis that Abnormal Indivisible Loads (AILs) are not expected to be required as part of the operation of the proposed development. The Inspectorate is content this matter can be scoped out of the ES.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			The Scoping Report proposes to assess decommissioning impacts from hazardous / large loads from all elements of the proposed development at the time of decommissioning. The Inspectorate directs the applicant to comments in ID 2.1.13 which should be addressed in the ES in relation to decommissioning and therefore does not agree to scope out this matter on the information provided. The applicant's attention is drawn to the consultation response from the Canal and River Trust at Appendix 2 of this Scoping Opinion regarding the use of trust-owned bridges that may have dimensional constraints or weight limits by HGV construction traffic.

ID	Ref	Description	Inspectorate's comments
344	n/a	Transport Assessment	The applicant's attention is drawn to the consultation response from the Peak District National Park Authority at Appendix 2 of this Scoping Opinion regarding the consideration of capacity of routes into and out of the National Park during peak visitor times within the Transport Assessment. The applicant is advised to further discuss this matter with the Peak District National Park Authority to seek agreement on the level of information required.
345	Paragraphs 16.4.15 to 16.4.19 and 16.5.17	Transportation of hazardous waste	The Scoping Report states that liquid hazardous waste arising from the operation of the proposed development may be managed by high-temperature incineration, physico-chemical treatment plants, and cement kilns at a national scale, as such infrastructure typically receives inputs from a large geographic region. The ES should clarify how hazardous operational wastes are transported to these management sites, and whether any LSEs may arise as a result of transportation.

3.5 Noise and vibration

(Scoping Report Section 9)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
35.1	Paragraph 9.6.8 and Tables 9-21 to 9-23	Vibration impacts (operation)	The Scoping Report proposes to scope out vibration impacts for all elements of the proposed development on the basis that vibration during operation is expected to be negligible. The Inspectorate agrees that vibration impacts during operation will be minimal and is content that this matter can be scoped out of the ES.
35.2	Tables 9-21 to 9-23	Noise from road traffic (operation)	The Scoping Report proposes to scope out noise from road traffic for all elements of the proposed development on the basis that road traffic movements are expected to be minimal. The Inspectorate is content that minimal road traffic movements would occur during operation and that significant effects are unlikely. On this basis, this matter can be scoped out of further assessment. However, the ES should confirm the operational vehicle types and numbers (with reference to thresholds within guidance) to justify this position.

ID	Ref	Description	Inspectorate's comments
35.3	Tables 9-5 to 9-13	Noise and vibration baseline / study areas	It would assist the reader if a figure illustrating the study areas and sensitive receptors set out in tables 9-5 to 9-13 of the Scoping Report is provided in the ES.
35.4	Paragraph 3.2.76	Potential for blasting	With regards to installation of the pipeline, the Scoping Report states that blasting may be required in areas of shallow rock. This matter is not discussed in the noise and vibration section. The ES must identify and explain any need for blasting as part of the construction

ID	Ref	Description	Inspectorate's comments
			process. The noise and vibration assessment should include an assessment from blasting on human and ecological receptors where significant effects are likely.

3.6 Historic environment

(Scoping Report Section 10)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
Impacts from above ground components (capture facilities, AGIs and BVS)			
36.1	Table 10-8	Temporary impacts through changes to the setting of designated heritage assets (operation)	The Scoping Reports seeks to scope out temporary impacts through change to the setting of designated heritage assets from the above ground components (capture facilities, AGIs and BVSs) during operation. The Inspectorate agrees that this matter may be scoped out on the basis that temporary impacts on setting would only occur during construction and decommissioning phases and therefore no additional potential direct impacts to heritage assets would occur during operation.
36.2	Table 10-8	Temporary impacts through change to the setting of non-designated heritage assets (operation)	The Scoping Reports seeks to scope out temporary impacts through change to the setting of non-designated heritage assets from the above ground components (capture facilities, AGIs and BVSs) during operation. The Inspectorate agrees that this matter may be scoped out on the basis that temporary impacts on setting would only occur during construction and decommissioning phases and therefore no additional potential direct impacts to heritage assets would occur during operation.
36.3	Table 10-8	Permanent impacts through change to the setting of designated assets (decommissioning)	The Scoping Reports seeks to scope out permanent impacts through change to the setting of designated heritage assets from the above ground components (capture facilities, AGIs and BVSs) during decommissioning. The Inspectorate agrees that this matter may be scoped out on the basis that permanent impacts on setting would only occur during construction and operation and therefore no additional potential direct impacts to heritage assets would occur during decommissioning.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
364	Table 10-8	Permanent impacts through change to the setting of non-designated assets from above ground components (decommissioning)	The Scoping Reports seeks to scope out permanent impacts through change to the setting of non-designated heritage assets from the above ground components (capture facilities, AGIs and BVSs) during decommissioning. The Inspectorate agrees that this matter may be scoped out on the basis that permanent impacts on setting would only occur during construction and operation and therefore no additional potential direct impacts to heritage assets would occur during decommissioning.
365	Table 10-8	Physical impacts to known below ground archaeological remains from above ground components (operation)	The Scoping Reports seek to scope out physical impacts to known below ground archaeological remains from the above ground components (capture facilities, AGIs and BVSs) during operation. The Inspectorate agrees that this matter may be scoped out on the basis that physical impacts on known below ground archaeological remains would only occur during construction and decommissioning and therefore no additional potential direct impacts to heritage assets would occur during operation.
366	Table 10-8	Physical impacts to as yet unknown below ground archaeological remains from above ground components (operation and decommissioning)	The Scoping Reports seeks to scope out physical impacts to as yet unknown below ground archaeological remains from the above ground components (capture facilities, AGIs and BVSs) during operation and decommissioning. The Inspectorate agrees that this matter may be scoped out for the operational phase, on the basis that physical impacts on as yet unknown below ground archaeological remains would only occur during construction and therefore no additional potential direct impacts to heritage assets would occur during operation. However, if below ground archaeology were to be discovered during the construction phase, then the ES should include an assessment of how decommissioning activities may affect them.
367	Table 10-8	Temporary impacts on historic landscape character from above	The Scoping Reports seeks to scope out temporary impacts on historic landscape character from the above ground components (capture facilities, AGIs and BVSs) during operation.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
		ground components (operation)	The Inspectorate agrees that this matter may be scoped out on the basis that temporary impacts on setting would only occur during construction and decommissioning phases and therefore no additional potential direct impacts to historic landscape would occur during operation.
36.8	Table 10-8	Permanent impacts on historic landscape character from above ground components (decommissioning)	The Scoping Reports seeks to scope out permanent impacts on historic landscape character from the above ground components (capture facilities, AGIs and BVSs) during decommissioning. The Inspectorate agrees that this matter may be scoped out on the basis that permanent impacts on historic landscape character would only occur during construction and operation and therefore no additional potential direct impacts would occur during decommissioning.
Impacts from below ground components (Peak Cluster Pipeline and Coastal AGI to MLWS pipeline(s))			
36.9	Table 10-9	Temporary impacts through changes to the setting of designated heritage assets from below ground components (operation)	The Scoping Reports seeks to scope out temporary impacts through changes to the setting of designated heritage assets from the below ground components during operation. The Inspectorate agrees that this matter may be scoped out on the basis that temporary impacts on setting would only occur during construction and decommissioning phases and therefore no additional potential direct impacts to heritage assets would occur during operation.
36.10	Table 10-9	Temporary impacts through change to the setting of non-designated heritage assets from below ground components (operation)	The Scoping Reports seeks to scope out temporary impacts through change to the setting of non-designated heritage assets from the below ground components during operation. The Inspectorate agrees that this matter may be scoped out on the basis that temporary impacts on setting would only occur during construction and decommissioning phases and therefore no additional potential direct impacts to heritage assets would occur during operation.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
36.11	Table 10-9	Permanent impacts through change to the setting of designated assets from below ground components (decommissioning)	The Scoping Reports seeks to scope out permanent impacts through change to the setting of designated heritage assets from the below ground components during decommissioning. The Inspectorate agrees that this matter may be scoped out on the basis that permanent impacts on setting would only occur during construction and operation and therefore no additional potential direct impacts would occur during decommissioning.
36.12	Table 10-9	Permanent impacts through change to the setting of non-designated assets from below ground components (decommissioning)	The Scoping Reports seeks to scope out permanent impacts through change to the setting of non-designated heritage assets from the below ground components during decommissioning. The Inspectorate agrees that this matter may be scoped out on the basis that permanent impacts on setting would only occur during construction and operation and therefore no additional potential direct impacts to heritage assets would occur during decommissioning.
36.13	Table 10-9	Physical impacts to known below ground archaeological remains from below ground components (operation)	The Scoping Reports seeks to scope out physical impacts to known below ground archaeological remains from the above below ground components during operation. This is on the basis that physical impacts on known below ground archaeological remains would only occur during construction and decommissioning and therefore no additional potential direct impacts to heritage assets would occur during operation. The Inspectorate does not agree to scope this matter out and consideration should be given to potential changes to groundwater levels from the pipeline which may result in deterioration of archaeological remains. This should be considered in the ES.
36.14	Table 10-9	Physical impacts to as yet unknown below ground archaeological remains from below ground components	The Scoping Report seeks to scope out physical impacts to as yet unknown below ground archaeological remains from below ground components during operation and decommissioning. The Inspectorate agrees that this matter may be scoped out on the basis that physical impacts to as yet unknown below ground archaeological remains would only occur during

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
		(operation and decommissioning)	construction. The pipeline would remain in situ during decommissioning and therefore no additional potential direct impacts to heritage assets would occur during operation and decommissioning.
36.15	Table 10-9	Temporary impacts on historic landscape character from below ground components (operation and decommissioning)	The Scoping Report seeks to scope out temporary impacts on historic landscape character from below ground components during operation and decommissioning. The Inspectorate agrees that this matter may be scoped out on the basis that temporary impacts on setting would only occur during construction and therefore no additional potential direct impacts to historic landscape would occur during operation.
36.16	Table 10-9	Permanent impacts on historic landscape character from below ground components (decommissioning)	The Scoping Report seeks to scope out permanent impacts on historic landscape character from below ground components during decommissioning. The Inspectorate agrees that this matter may be scoped out on the basis that permanent impacts on setting would only occur during construction and operation and therefore no additional potential direct impacts to historic landscape would occur during decommissioning.

ID	Ref	Description	Inspectorate's comments
36.17	Section 10.3 and paragraph 10.7.17	Study area	Section 10.3 of the Scoping Report sets out the study areas which are proposed for the above and below ground components of the proposed development, however these are inconsistent with the study areas set out in paragraph 10.7.17. The Scoping Report explains that the current study areas will be reviewed and finalised taking into account the final Zone of Theoretical Visibility. The ES should confirm the final selected study area(s) and illustrate these on a figure(s). It should explain how the study area(s) were selected, based on the ZOI for each impact pathway scoped into the assessment. Effort should be made to agree the study area with relevant consultation bodies.

ID	Ref	Description	Inspectorate's comments
36.18	Figures 10-2 E and 10-2F	Identified assets	The ES should ensure that all historic environment assets are identified and depicted on supporting figures. The applicant's attention is directed to the comments of Cheshire West and Chester Council and The Canal and River Trust at Appendix 2 to this Scoping Opinion with regards to specific heritage assets that may be affected by the proposed development and should be considered in the assessment, where likely significant effects could occur.
36.19	Table 10-5	Trial trenching.	All of the proposed survey work is planned in order to inform the ES, with the exception of trial trenching, which is proposed to be undertaken post consent. The Inspectorate advises that trial trenching should be undertaken in order to inform the assessment in the ES. The applicant's attention is directed to comments from Historic England at Appendix 2 of this Scoping Opinion.
36.20	Table 5	Scope of Surveys	Table 5 outlines the surveys proposed by the applicant. At this stage, the description is very high level. The ES should provide detailed information regarding the methodology, scope and results of survey work. If possible, this should be agreed with relevant consultees. Any limitations regarding the scope of the surveys, such as being unable to access land, should be sufficiently explained.
36.21	Paragraph 10.7.14	Non-designated heritage assets	The Inspectorate notes that information regarding non-designated heritage assets has not been included in the Scoping Report. However, this information will be presented in the ES. The ES should explain the study area which has been applied for non-designated heritage assets and ensure information regarding non-designated heritage assets is supported by figures showing location of the assets in relation to the proposed development. It would also be helpful for a tabulated list to be included in Appendix H to include the list of non-designated heritage sites. The Applicants attention is directed to comments from Cheshire West and Chester Council, the Peak District National Park Authority and Historic England at Appendix 2 to this Scoping Opinion.

3.7 Water environment and flood risk

(Scoping Report Section 11)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
37.1	Table 11-15	Fluvial flood risk to the capture facilities (operation)	The Scoping Report seeks to scope out fluvial flooding during operation of the capture facilities on the basis that the potential to reduce capacity of the existing floodplain storage and impact on fluvial flows would occur during construction and decommissioning. The Scoping Report acknowledges that some facilities are located in flood zones 2 and 3 and therefore further analysis may be required. At this stage, the Inspectorate does not agree to scoping this matter out of the ES. Accordingly, the ES should provide further details regarding the capture facilities located in flood zones 2 and 3 and provide an assessment where significant effects are likely to occur.
37.2	Table 11-15	Tidal flood risk to the capture facilities (all phases)	The Scoping Report seeks to scope out tidal flood risk to the capture facilities during all phases of the capture facilities on the basis that the proposed development lies outside of the tidal floodplain. On this basis, the Inspectorate agrees this may be scoped out of the ES.
37.3	Table 11-15	Surface water flood risk to the capture facilities (operation)	The Scoping Report seeks to scope out surface water flood risk during operation of the capture facilities on the basis that it is assumed there would be no increase during operation as the works are within the existing facilities. On this basis the Inspectorate agrees this may be scoped out of the ES.
37.4	Table 11-15	Canal breach flood risk to capture facilities (all phases)	The Scoping Report seeks to scope out canal breach flood risk during all phases of the capture facilities on the basis that no canals are within the site boundaries of the capture facilities. On this basis, the Inspectorate agrees this may be scoped out of the ES.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
37.5	Table 11-15	Reservoirs flood risk to capture facilities (all phases)	The Scoping Report seeks to scope out reservoir flood risk during all phases of the capture facilities on the basis that the capture facilities are considered to be outside of any predicted flood event if a breach from a reservoir were to occur. On this basis, the Inspectorate agrees this may be scoped out of the ES.
37.6	Table 11-16	Potential hydromorphological impacts on watercourse from the Peak Cluster Pipeline and Coastal AGI to MLWS pipeline(s) – (decommissioning)	The Scoping Report seeks to scope out potential hydromorphological impacts on watercourses from the Peak Cluster Pipeline and Coastal AGI to MLWS pipeline(s) during decommissioning on the basis that the pipeline would be left in situ during decommissioning. If the pipeline is retained in situ on decommissioning, there is unlikely to be an impact pathway to significant effects. The Inspectorate agrees this matter can be scoped out of the assessment.
37.7	Table 11-16	Water supply and foul drainage Peak Cluster Pipeline and Coastal AGI to MLWS pipeline(s) (operation and decommissioning)	The Scoping Report seeks to scope out impacts on water supply and foul drainage risk to the Peak Cluster Pipeline and Coastal AGI to MLWS pipeline(s) during operation and decommissioning on the basis that once the pipeline is installed there would be no requirement for water supply or foul drainage. On this basis, the Inspectorate agrees this may be scoped out of the ES with regards to the operational and decommissioning phases of the pipeline. However, risk from foul drainage and requirement for water supply for other elements of the proposed development should be considered where significant effects may occur.
37.8	Table 11-16	Tidal flood risk to Peak Cluster Pipeline and coastal AGI to MLWS pipeline(s) (operation)	The Scoping Report seeks to scope out impacts from tidal flood risk to the Peak Cluster Pipeline and Coastal AGI to MLWS pipeline(s) during operation. The Scoping Report states that as the Coastal AGI to MLWS pipeline(s) are located within the tidal floodplain they are at risk from tidal flooding during construction and decommissioning but not operation. The Scoping Report also identifies the potential need for an operational compound for the Coastal AGI.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			At this stage, the Inspectorate is unable to scope this matter out. The ES should assess the potential impacts from tidal flooding during operation, which should account for future tidal flooding which may be influenced by climate change where significant effects are likely to occur. The assessment should include the proposed pipeline(s), the Coastal AGI and the operational compound.
3.7.9	Table 11-16	Reservoir flood risk to Peak Cluster Pipeline and Coastal AGI to MLWS pipeline(s) (all phases)	The Scoping Report seeks to scope out reservoir flood risk to the Peak Cluster Pipeline and Coastal AGI to MLWS pipeline(s) during all phases. The scoping report explains that the Coastal AGI to MLWS pipeline(s) are located in the predicted reservoir flood extent but due to managed risk, the risk of flooding from reservoir is considered to be residual. The Inspectorate does not agree to scoping this matter out for all phases at this stage. The ES should explain what the term 'managed risk' is and how this will prevent any likely significant adverse effects.

ID	Ref	Description	Inspectorate's comments
3.7.10	Paragraph 11.8.3	Amines	The Scoping Report states that details are still being finalised regarding process requirements. The ES should ensure that amines should be considered in relation to waste water discharge associated with the carbon capture process.
3.7.11	Paragraph 11.5.1	Operational impacts	The Scoping Report states that the ES will consider the risk of surface water flooding from the new AGI's, but the ES should also consider the increased risk of surface water flooding as a result of all new built infrastructure, including the BVS.
3.7.12	n/a	Canals	The ES should include canals as receptors in the water environment assessment. The ES should assess the potential for impacts to the canal network from the proposed development resulting from changes to water supply. The applicant's attention is directed to comments from the Canals and River Trust at Appendix 2 of this Scoping Opinion.

3.8 Marine environment

(Scoping Report Section 12)

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

ID	Ref	Description	Inspectorate's comments
382	Paragraph 12.1.3	Activities in the intertidal area	The Scoping Report provides a list of activities which may be required in the intertidal area. The ES should consider the nature of the coastal location and dynamic intertidal environment, together with potential impacts on ecology in this area. The ES should consider the potential for future exposure of the pipeline and assess whether pipeline protection would be needed, and if so, this should be assessed. The applicant's attention is directed to comments from Natura I England at Appendix 2 of this Scoping Opinion.
383	Paragraph 12.2.3	Structure of the marine environment section	The marine environment chapter includes the following areas of assessment: • Marine ecology • Marine archaeology • Physical processes • Marine transport and navigation. It is not clear whether these aspects will be presented as individual aspect chapters in the ES or remain under the wider chapter of Marine Ecology. Depending on the length of each aspect and number of supporting figures, it may be more appropriate to separate these aspects into their own chapters in the ES.
384	Section 12.2.	Study area	The marine ecology section includes many different elements, such as benthic ecology, marine mammals, fish. The study areas have not yet been set out for these elements. The

ID	Ref	Description	Inspectorate's comments
			ES should make clear the study area for all elements which comprise the marine ecology chapter, together with the Zol from the proposed development over which potential likely significant effects in respect of physical processes could arise.
385	Paragraph 12.2.19	Marine water quality	The ES should assess the risk to the marine environment from accidental spills of pollutants. The applicant's attention is directed to comment from the Environment Agency at Appendix 2 to this Scoping Opinion.
386	Paragraph 12.2.19	Underwater noise	The Scoping Report identifies that there may be impacts from underwater noise during construction and operation of the proposed development. The ES should explain the approach and methodology of the underwater noise assessment and provide details of the sensitive receptors which may be affected. Early engagement with the MMO is encouraged to ensure that any noise modelling utilising site-specific physical parameters and project specific detail is appropriate and fit for purpose.
387	Paragraphs 12.2.21 and 12.2.22	Mitigation	The Scoping Report provides very limited and high-level detail regarding potential mitigation measures. The ES should clearly describe any mitigation measures implemented, such as seasonal restrictions for construction works. Mitigation measures should be agreed, if possible, with relevant stakeholders and the ES should explain how measures would be secured.
388	Paragraph 12.4.2	Modelling	The use of modelling is only referred to with regards to physical processes. It is not clear whether modelling will be undertaken to inform the other elements which comprise the marine ecology aspect. The ES should clearly describe any modelling undertaken to inform the impact assessment and seek to agree the scope of the marine ecology assessments with relevant consultation bodies such as NE and the MMO.

3.9 Geology and ground conditions

(Scoping Report Section 13)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
39.1	Tables 13-15 and 13-16	Impacts on construction workers from capture facilities, the pipeline and Coastal AGI to MLWS pipeline (operation)	The Scoping Report seeks to scope out effects during operation on construction workers from contaminated land and ground gas during operation of the capture facilities, the pipeline and Coastal AGI to MLWS pipeline. The Inspectorate agrees this may be scoped out as there would be no pathway on construction workers during operation.
39.2	Table 13-15	Impacts on infrastructure Carbon Capture Plant (CCPs) from capture facilities (operation)	The Scoping Report seeks to scope out effects during operation of the capture facilities on CCPs. This is on the basis that the potential for effects on the built environment relating to ground gas and aggressive ground conditions may occur in the construction and decommissioning phases and not during operation. On this basis, the Inspectorate agrees this may be scoped out of the ES.
39.3	Table 13-15	Impacts on environmental designations from capture facilities (operation)	The Scoping Report seeks to scope out impacts on the Peak District National Park Special Area of Conservation (SAC) and Tunstead and Hope Site of Special Scientific Interest (SSSI). This is on the basis that impacts will occur during construction and decommissioning and not during operation. On this basis, the Inspectorate agrees this may be scoped out of the ES.
39.4	Table 13-16	Impacts on environmental designations from the pipeline and Coastal AGI to MLWS pipeline (operation)	The Scoping Report seeks to scope out impacts on the Peak District National Park Special Area of Interest and Special Protection Area. The term 'special area of interest' has not been defined in the Scoping Report and it is not clear which Special Protection Area is being referred to. The Inspectorate notes this will be scoped in for the construction and decommissioning phases, and the scoping report explains this is due to the potential for effects on hydrology

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			during those phases. There would not be impacts during operation. The Inspectorate agrees this may be scoped out for the operational phase; however, the ES should define what is meant by the term 'special area of interest'.
395	Table 13-16	Geological designations (operation and decommissioning)	The Scoping Report seeks to scope out impacts on geological designations from the pipeline and Coastal AGI to MLWS pipeline during operation and decommissioning. Limited information is presented in the Scoping Report for scoping out operational and decommissioning effects from the ES, beyond the point that impacts will occur during construction and as the pipeline will remain in-situ during decommissioning, then there would be no pathway for effect during that phase. If the pipeline is retained in situ on decommissioning, there is unlikely to be an impact pathway to significant effects. The Inspectorate agrees that this can be scoped out of the assessment.

ID	Ref	Description	Inspectorate's comments
396	Table 13-4	Baseline	The ES should ensure that the baseline environment data is comprehensive and includes details of all other past and present quarry activities. The applicant's attention is directed to comments by Peak District National Park Authority in Appendix 2 to this Scoping Opinion.
397	n/a	Depiction on figures	It is noted that records of Local Geology Sites and Regionally Important Geological Sites in the pipeline study area have not been reviewed at this stage due to the linear extent of the pipeline. The ES should include details of all geological sites and figures should be provided which show the location of geological sites within the study area.

3.10 Socio-economics

(Scoping Report Section 14)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.10.1	14.1.1	Decommissioning phase	The Scoping Report proposes to scope out the decommissioning phase of the proposed development in accordance with the applicant's overarching approach of producing a Decommissioning Environmental Management Plan at a later date. For further detail, see ID 2.1.13 of this review. On this basis and provided the issues highlighted in ID 2.1.13 regarding decommissioning are addressed, the Inspectorate agrees that this matter may be scoped out of the ES.
3.10.2	Tables 14-13 and 14-18	Impact on development land, utilities, and renewables infrastructure (operation and maintenance)	The Scoping Report states that any temporary or permanent effects on development land, utilities, and renewables infrastructure would arise during the construction phase, and no significant effects are anticipated during operation and maintenance. On this basis the Inspectorate agrees that this matter may be scoped out of the ES.
3.10.3	Tables 14-13 and 14-18	Impact on affected communities, community facilities, visitor attractions, and businesses (construction, operation, and maintenance)	The Scoping Report states that the proposed development has been designed to avoid significant adverse effects on these receptors. The Inspectorate notes that baseline data collection for the measurement of impacts upon local receptors is ongoing. The design of the proposed development and location of elements such as the AGI and BVSs have not yet been finalised. In light of this, it is unclear how the avoidance of significant adverse effects upon these receptors has been assured. In the absence of information, such as evidence demonstrating how LSEs upon the receptors listed have been assessed and prevented, the Inspectorate does not agree to scope this matter out of the ES.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.104	Table 14-13	Residential properties (operation and maintenance)	The Scoping Report seeks to scope out impacts on residential properties from potential temporary or permanent loss of residential property, access and impact on amenity. This is on the basis that the proposed development has been designed to avoid significant adverse effects on residential properties. The design of the proposed development and location of elements such as the AGI and BVSs have not yet been finalised. In light of this, it is unclear how the avoidance of significant adverse effects upon these receptors has been assured. Therefore, the Inspectorate does not agree to scope this matter out at this stage. The ES should provide an assessment of effects on residential properties where significant effects may be experienced.
3.105	Table 14-18	Local labour market (decommissioning)	The Scoping Report seeks to scope out impacts on the local labour market during decommissioning. This is scoped in for construction and operation due to potential for employment and training. The Inspectorate agrees it is unlikely that there would be significant impacts on the local labour market during decommissioning and therefore this may be scoped out of the ES.

ID	Ref	Description	Inspectorate's comments
3.106	Table 13-16	Impacts on livestock	Potential effects on livestock during construction and decommissioning is scoped in for Chapter 13, Geology and Ground Conditions. The ES should also include an assessment of effects on livestock in terms of severance issues during construction and decommissioning.
3.107	n/a	Offshore activities	The ES should confirm if any offshore activities such as commercial/recreational fishing may be affected by the proposed development and therefore should be included in the assessment of likely significant effects.

3.11 Human health

(Scoping Report Section 15)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.11.1	Tables 15-14 to 15-16	Impacts from severance (operation)	The Scoping Report proposes to scope out potential changes to the accessibility of: • Public Rights of Way (PRoWs) • Recreational routes • Active travel networks, arising from severance during operation of all project elements as no permanent changes are anticipated. The Inspectorate agrees that this matter may be scoped out on the basis that temporary impacts from severance would only occur during construction and decommissioning and no additional impacts would occur during operation. The applicant's attention is drawn to the consultation response from Cheshire East Council at Appendix 2 of this Scoping Opinion regarding the consideration of impacts on the Middlewood Way PRoW in the ES.
3.11.2	Tables 15-14 to 15-16	Impacts on access to local community services (operation)	The Scoping Report proposes to scope out potential impacts on access to local community services during operation from all project elements on the basis that no roads will be impacted and the scale of operational employment will be limited. The Inspectorate agrees that operational impacts on access to roads and employment opportunities will be limited and is content this matter can be scoped out of the ES.
3.11.3	Tables 15-15 and 15-16	Impacts on social cohesion and community identity (operation)	The Scoping Report proposes to scope out impacts on social cohesion and community identity from the pipelines and AGIs during operation on the basis that no permanent changes to social cohesion or community identity are anticipated.

			The Inspectorate agrees that operational impacts on social cohesion and community identity will be limited and is content this matter can be scoped out of the ES.
3.114	Tables 15-14 to 15-16	Impacts on employment and training opportunities (operation)	The Scoping Report proposes to scope out impacts on employment and training opportunities during operation for all project elements as the scale of operational employment is likely to be limited. The Inspectorate agrees that employment and training opportunities associated with the proposed development during operation are likely to be limited and on this basis is content that this matter can be scoped out of the ES.
3.115	Tables 15-14 to 15-16	Impacts on climate change from greenhouse gases (GHG) emissions for capture facilities (construction and decommissioning) Impacts on climate change from GHG emissions for pipeline and AGI (all phases)	The Scoping Report proposes to scope out impacts on climate change from GHG emissions for: • Capture Facilities during construction and decommissioning • Pipelines and Above Ground Installations during all project phases, on the basis that construction and decommissioning are not likely to generate substantial GHG emissions and operation of the pipelines and AGIs will not directly contribute towards reducing CO2 emissions. On the basis of the information presented in the Scoping Report, the Inspectorate is content that this matter can be scoped out of the ES. However, the ES should still demonstrate how the proposed development will seek to minimise GHG emissions during construction and decommissioning.
3.116	Tables 15-14 to 15-16	Potential impacts from Electro-magnetic fields (EMFs) (construction and decommissioning)	The Scoping Report proposes to scope out impacts from EMFs from the pipelines and Above Ground Installations during construction and decommissioning as mitigation measures will be embedded in the design and installation of energy cabling. On the basis of the information presented in the Scoping Report, the Inspectorate is content that an assessment of EMF impacts on human health can be scoped out of the ES.

ID	Ref	Description	Inspectorate's comments

3.11.7	Paragraph 15-3 and Table 15-3	Human health study area	It would assist the reader if a figure illustrating the study areas set out in paragraph 15-3 and table 15.3 of the Scoping Report is provided in the ES.
3.11.8	Tables 5-10 to 5-12, Tables 15-14 to 15-16	Decommissioning impacts	The assessment of air quality impacts during decommissioning has been scoped out of the air quality assessment on the basis that these impacts will be assessed at the time of decommissioning. Tables 15-14 to 15-16 state that decommissioning of all elements of the proposed development may impact human health via changes to air quality and are scoped in, meaning the applicant's approach is unclear. For the avoidance of doubt, the Inspectorate considers that this matter should be scoped in for all stages of the proposed development where likely significant effects could occur. Further comments on this matter are provided in ID 2.1.13.

3.12 Materials and waste

(Scoping Report Section 16)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.121	Tables 16-22 and 16-23	Changes in demand for materials (operation and decommissioning)	The Scoping Report seeks to scope out impacts from changes in demand for materials from the Capture Facilities, Peak Cluster Pipeline and Coastal AGI to MLWS Pipeline during operation and decommissioning. The Scoping Report states that the forecasted impacts on material demand arising in the operational and decommissioning phases of the proposed development are considered negligible in relation to the scale and nature of the proposed development. On this basis, the Inspectorate agrees that this matter may be scoped out of the ES.
3.122	Table 16-22	Changes to hazardous waste management facility inputs from the capture facilities (operation)	The Scoping Report seeks to scope out impacts from changes to hazardous waste management on the basis that waste processing and recovery facilities are not considered to be sensitive receptors. On this basis, the Inspectorate agrees this may be scoped out from operation.
3.123	Tables 16-22 and 16-23	Waste arising from extraction, processing and manufacture of construction components and products (all phases)	The Scoping Report seeks to scope out impacts from waste arising from extraction, processing and manufacture of the construction components from the capture facilities, PCP and Coastal AGI to MLWS Pipeline during all phases. The Scoping Report states that this matter cannot be accurately predicted and assessed, and it is assumed that the production of construction materials necessitated by the proposed development will occur in manufacturing environments with their own regulatory regimes. The Scoping Report states that such production will partially occur beyond the geographic scope of the assessment and relate to procurement decisions that cannot be assured. On this basis, the Inspectorate agrees that this matter may be scoped out of the ES.

3.124	Tables 16-22 and 16-23	Other environmental impacts associated with the management of waste (all phases)	The Scoping Report seeks to scope out other environmental impacts associated with waste management from the capture facilities, PCP and Coastal AGI to MLWS Pipeline during all phases. The Scoping Report states that the following environmental impacts are addressed in other relevant chapters of the Scoping Report: water environment and flood risk, air quality, noise and vibration, traffic and movement, and geology and ground conditions. On this basis, the Inspectorate agrees that these matters may be scoped out of the materials and waste section of the ES.
3.125	Tables 16-22 and 16-23	Off-site environmental impacts at waste management facilities (all phases)	The Scoping Report seeks to scope out offsite environmental impacts at waste management facilities from the capture facilities, pipeline and Coastal AGI to MLWS Pipeline during all phases. The Scoping Report refers to IEMA guidance indicating that indirect impacts associated with off-site waste management and material production facilities are typically assumed to fall within the remit of the regulatory regimes governing those facilities. The Inspectorate agrees to scope this out, however consideration should be given to the potential for downstream effects as a result of activities of the proposed development.

ID	Ref	Description	Inspectorate's comments
3.126	Paragraph 16.4.13; and Tables 16-11 to 16-13	Inference of waste management infrastructure capacity	The Scoping Report states that waste management infrastructure capacity (excluding landfill) can be inferred from annual waste inputs. Data on annual waste inputs at relevant waste management sites is provided across several tabulations and informs the assessment of impacts arising from operational waste development arising as a result of the proposed development. However, the process by which waste management infrastructure capacity is inferred from annual waste inputs should be clarified to ensure a transparent assessment of likely effects.

3.127	Section 16.5	Methodology for determining decommissioning effects	The ES provide an estimate of volume of waste to be produced during the commissioning phase. It is likely that the pipeline will be left in situ. However other elements of the proposed development such as the AGIs, BVS will be removed. The ES should explain how waste during decommissioning would be managed.

3.13 Climate change

(Scoping Report Section 17)

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

ID	Ref	Description	Inspectorate's comments
3.132	n/a	Calculation methods	The ES should quantify the Greenhouse Gas (GHG) emissions relating to the proposed development. The calculation methods used should be explained. The ES should state any assumptions made in calculating the predicted GHG emissions, any limitations to the calculations and any uncertainties this presents for the assessment of GHG emissions. Peak District National Park Authority as part of its consultation response provided views on the methodologies to be used. The applicant is encouraged to discuss calculation methods and general methodologies with statutory consultees and agree these where possible.
3.133	Paragraph 17.7.28	Application of UK climate projections	It is noted that UKCP18 climate projections are referenced in the reference section of the Scoping Report, however this is not discussed in the chapter itself. The ES should set out how UKCP18 has been considered within the assessment in relation to the climate parameters listed in paragraph 17.7.28.
3.134	Chapter 13	Peat	It is noted that chapter 13 identifies the potential for peat deposits in the land required for the proposed development, the climate change assessment should demonstrate how works within areas of peat have been considered within the assessment.
3.135	n/a	Downstream effects	The ES should assess the potential for downstream effects as a result of activities of the proposed development.

3.14 Major accidents and disasters

(Scoping Report Section 18)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.14.1	Paragraph 18.7.7	Activities under health and safety and construction design management regulations (all phases)	The Scoping Report sets out that major accidents and/or disasters associated with construction, commissioning, operation and maintenance activities that fall within the scope for health and safety legislation, and Construction Design and Management (CDM) regulations are not to be considered as part of the assessment. The Inspectorate is content with this approach providing that the ES can demonstrate that the regulations and legislation referenced provide adequate mitigation to ensure no likely significant effects.
Major accidents and disasters - Capture Facilities			
Natural hazards - geophysical			
3.14.2	Table 18-13	Earthquakes (all phases)	The Scoping Report notes that these are unlikely to be powerful enough to cause severe damage. The Inspectorate agrees with this statement considering the location of the capture facilities and is content to scope this matter out.
3.14.3	Table 18-13	Volcanic activity (all phases)	The Scoping Report identifies that worst case scenario has been considered of an ash-rich volcanic eruption in UK airspace. The Inspectorate agrees that considering the location of the capture facilities that significant effects are unlikely and therefore this matter can be scoped out.
3.14.4	Table 18-13	Sinkholes (operation and decommissioning)	The Inspectorate agrees that the potential for sinkholes is more likely to be present in the construction phase and therefore is content to scope out likely significant effects of these during operation. The Inspectorate considers that risk from sinkholes during decommissioning should be considered.

3.14.5	Table 18-13	Tsunamis (all phases)	The Inspectorate agrees that this matter can be scoped out as the capture facilities are not located in a risk zone.
Natural hazards - hydrology			
3.14.6	Table 18-13	Tidal flooding (all phases)	The Inspectorate agrees that this matter can be scoped out as the capture facilities are not located in a flood risk zone for this type of flooding.
3.14.7	Table 18-13	Fluvial flooding (all phases)	The Inspectorate agrees that this matter can be scoped out as the capture facilities are not located in a flood risk zone for this type of flooding.
3.14.8	Table 18-13	Pluvial flooding (all phases)	The Scoping Report acknowledges the potential for pooling of water after prolonged rainfall events however the Inspectorate agrees that this is unlikely to result in a likely significant effect of a major accident or disaster.
3.14.9	Table 18-13	Groundwater flooding (all phases)	The Scoping Report acknowledges the potential for and increased risk in groundwater flooding during excavations during the construction phase however the Inspectorate agrees that this is unlikely to result in a likely significant effect of a major accident or disaster.
3.14.10	Table 18-13	Avalanches (all phases)	The Inspectorate agrees that this matter can be scoped out as the capture facilities are not located in a risk zone for avalanches.
Natural hazards – climatological and meteorological			
3.14.11	Table 18-13	Cyclones, hurricanes, typhoons, storms and gales (all phases)	The Scoping Report notes that the capture facilities will be designed in line with UK standards which take into account environmental conditions including exposure to UK weather conditions. Noting this, significant effects are unlikely and the Inspectorate agrees that this matter can be scoped out.
3.14.12	Table 18-13	Thunderstorms (construction and decommissioning)	The Scoping Report states that lightning strikes relate to elevated structures, such as the Coastal AGI stack, and are therefore unlikely during construction and decommissioning. Before scoping this matter out for construction and decommissioning, the ES should demonstrate the absence of these structures within these phases. The

			ES should also assess the potential for works during construction on pre-existing elevated structures. Therefore, the Inspectorate is unable to agree to scope this matter out at this time.
3.14.13	Table 18-13	Wave surges (all phases)	The Inspectorate agrees that this matter can be scoped out as the capture facilities are not located in a flood risk zone for this type of flooding.
3.14.14	Table 18-13	Extreme temperatures: heatwaves, low (sub-zero) temperatures and heavy snow (all phases)	The Inspectorate notes that significant effects in relation to this matter are unlikely and this matter may be scoped out of the ES.
3.14.15	Table 18-13	Droughts (all phases)	The Scoping Report identifies a low risk in supplies of water in this location. The Inspectorate agrees that likely significant effects in relation to major accidents and disasters occurring in this location as a result of this matter are unlikely and therefore is content to scope this matter out.
3.14.16	Table 18-13	Severe space weather: solar flares severe space weather: solar energetic particles severe space weather: coronal mass ejections (CMEs) (all phases)	The Inspectorate notes that significant effects in relation to this matter are unlikely and this matter may be scoped out of the ES.
3.14.17	Table 18-13	Wildfires: forest fire, bush/brush, pasture (all phases)	The Scoping Report notes that the Capture Facilities are not located in a wooded or highly vegetated area and therefore significant effects are unlikely. The Inspectorate agrees that this matter can be scoped out.
3.14.18	Table 18-13	Fog (all phases)	The Scoping Report identifies that safety measures would be in place to manage site operations should fog become an issue during construction and that it is unlikely to be an issue during operation. The Inspectorate considers that with relevant health and safety legislation in place, this matter can be scoped out.

Natural hazards - biological			
3.14.19	Table 18-13	Disease epidemics and animal diseases (all phases)	The Inspectorate agrees that construction is unlikely to give rise to any disease epidemics. Therefore, this matter can be scoped out.
3.14.20	Table 18-13	Plants (all phases)	The Scoping Report notes that standard control measures would be in place during construction to handle and dispose of any diseased or invasive plants to prevent their spread. Providing the ES explains how this commitment will be secured, the Inspectorate agrees this matter can be scoped out.
Technological or manmade hazards			
3.14.21	Table 18-13	Extensive public demonstrations Widespread damage to societies and economies The need for large scale multi-faceted humanitarian assistance The need for large scale multi-faceted humanitarian assistance The hindrance or prevention of humanitarian assistance by political and military constraints Significant security risks for humanitarian relief workers in some areas	The Inspectorate is content to scope these matters out.

		Famine Displaced populations (all phases)	
Technological or manmade hazards – industrial and urban hazards			
3.1422	Table 18-13	Major accidents hazards – chemical sites (all phases)	The Scoping Report identifies that no sites regulated under the COMAH regulations are located within 5km of the Capture Facilities. The Inspectorate is therefore content to scope this matter out.
3.1423	Table 18-13	Major accidents hazards – pipelines (all phases)	The Scoping Report commits to no damage to pipelines and consultation with Major Accident Hazard pipeline owners. Providing the ES explains how this commitment will be secured, the Inspectorate agrees this matter can be scoped out
3.1424	Table 18-13	Nuclear (all phases)	The Inspectorate agrees that this matter can be scoped out noting the likelihood of releases of radiological material in the UK is extremely low.
3.1425	Table 18-13	Fuel storage (all phases)	The Scoping Report commits to no damage to fuel storage and consultation with fuel storage site owners. The Inspectorate agrees that noting this commitment, this matter can be scoped out.
3.1426	Table 18-13	Dam breaches (all phases)	The Inspectorate agrees that this matter can be scoped out as the capture facilities are not located in a risk zone for this type of flooding.
3.1427	Table 18-13	Mine and storage caverns (all phases)	The Inspectorate agrees that this matter can be scoped out as the capture facilities are not located in a coal mining reporting area.
Technological or manmade hazards – transport accidents			

3.14.28	Table 18-13	Road and rail (all phases)	The Inspectorate notes that appropriate mitigation will be secured in a draft CEMP. On the basis that appropriate mitigation is secured in the draft CEMP, this matter can be scoped out.
3.14.29	Table 18-13	Waterways (all phases)	The Scoping Report notes that waterway crossings are not required for the construction of the capture facilities. The Inspectorate is therefore content to scope this matter out.
3.14.30	Table 18-13	Aviation (decommissioning)	The Scoping Report notes close liaison with Calton Moor Airfield but does not justify why this matter is to be scoped out for decommissioning. The ES should justify this approach or include an assessment.
Technological or manmade hazards – pollution accidents			
3.14.31	Table 18-13	Air (construction and decommissioning)	The Scoping Report notes that a potential for a significant loss of containment event, leading to a large-scale release of CO ₂ during operation. The Scoping Report does not justify why this would not be possible during construction and decommissioning. The ES should provide this information to support the scoping out of this matter for those phases.
3.14.32	Table 18-13	Land and water (construction and decommissioning)	The Scoping Report identifies the risk of leaks and spillages from hazardous materials associated with the capture facilities, dependent on the technology used. The Scoping Report does not justify why this would not be possible during construction and decommissioning. The ES should provide this information to support the scoping out of this matter for those phases.
3.14.33	Table 18-13	Electricity (all phases)	The Scoping Report notes a commitment to consult on and control any works required near electric overhead power lines as well as implementation of site-specific risk assessments. Providing the ES explains how this commitment will be secured, the Inspectorate agrees this matter can be scoped out
3.14.34	Table 18-13	Gas (all phases)	The Scoping Report commits to no damage to gas transmission assets and consultation with gas transmission owners. Providing the ES explains how this commitment will be secured, the Inspectorate agrees this matter can be scoped out

3.14.35	Table 18-13	Water supply (all phases)	The Scoping Report commits to no damage to water supply assets and consultation with water supply asset owners. Providing the ES explains how this commitment will be secured, the Inspectorate agrees this matter can be scoped out.
3.14.36	Table 18-13	Sewage system (all phases)	The Inspectorate notes that no use of the sewage system is required for the capture facilities and therefore the Inspectorate is content to scope this matter out.
Technological or manmade hazards – malicious attacks			
3.14.37	Table 18-13	Unexploded ordnance (all phases)	The Scoping Report notes that “The 5 km area around the Capture Facilities are all relatively low risk areas”. The Inspectorate agrees on this basis to scope this matter out but notes that the ES should be clear on the risk and the meaning of ‘relatively’.
3.14.38	Table 18-13	Chemical / biological / radiological / nuclear transport systems crowded places (all phases)	The Scoping Report identifies that the proposed development is unlikely to be a target for events such as these and therefore proposes to scope these matters out. The Inspectorate agrees.
Technological or manmade hazards – engineering accidents and failures			
3.14.39	Table 18-13	Cyber (construction and decommissioning)	The Scoping Report does not justify why this would not require assessing during construction and decommissioning. The ES should provide this information to support the scoping out of this matter for those phases.
3.14.40	Table 18-13	Bridge failure (all phases)	The Scoping Report proposed to scope this matter as no bridge works are required as part of the proposed development. The Inspectorate agrees to scope this matter out.
3.14.41	Table 18-13	Flood defence failure (all phases)	The Inspectorate agrees that this matter can be scoped out as the capture facilities are not located in a flood risk zone for any source of flooding.
3.14.42	Table 18-13	Mast and tower collapse (all phases)	The Scoping Report commits that any work required near an electric overhead power line would be controlled through consultation with operators and risk assessments

			undertaken. Provided the ES explains how this commitment will be secured, the Inspectorate agrees this matter can be scoped out.
3.14.43	Table 18-13	Property or bridge demolition accidents (operation and decommissioning)	The Scoping Report identifies that no property or bridges will be demolished as part of decommissioning. The Inspectorate has assumed that the same is accurate for operation. On this basis, the Inspectorate is content to scope this matter out for operation and decommissioning.
3.14.44	Table 18-13	Tunnel failure/fire (all phases)	The Scoping Report sets out that there are no tunnel structures proposed as part of the proposed development. On this basis, the Inspectorate is content to scope this matter out.
Major Accidents and Disasters Peak Cluster Pipeline and Coastal AGI to MLWS Pipeline			
Natural hazards - geophysical			
3.14.45	Table 18-14	Earthquakes (all phases)	The Scoping Report notes that these are unlikely to be powerful enough to cause severe damage. The Inspectorate agrees with this statement considering the location of the pipelines and is content to scope this matter out.
3.14.46	Table 18-14	Volcanic activity (all phases)	The Scoping Report identifies that worst case scenario has been considered of an ash-rich volcanic eruption in UK airspace. The Inspectorate agrees that significant effects are unlikely and therefore this matter can be scoped out.
3.14.47	Table 18-14	Landslides (decommissioning)	The Scoping Report does not provide any justification for scoping this matter out for decommissioning. The ES should include an assessment where significant effects are likely.
3.14.48	Table 18-14	Sinkholes (operation and decommissioning)	The Inspectorate agrees that the potential for sinkholes is more likely to be present in the construction phase and therefore is content to scope out likely significant effects of these during operation. The Inspectorate however deems that it should be demonstrated that works required during decommissioning would not be similar to those during construction to enable this matter to be scoped out in the decommissioning phase.

3.14.49	Table 18-14	Tsunamis (all phases)	The Inspectorate agrees that this matter can be scoped out as the proposed development is not located in a risk zone.
Natural hazards - hydrology			
3.14.50	Table 18-14	Tidal flooding (construction and decommissioning)	The Scoping Report identifies that multiple sections of the pipeline and AGIs are within the Wirral peninsular and are in areas at risk of tidal flooding. The Scoping Report does not provide information on scoping out the assessment of construction and decommissioning for this matter. On this basis, the Inspectorate does not agree to scope this matter out.
3.14.51	Table 18-14	Fluvial flooding (construction and decommissioning)	The Scoping Report identifies that multiple sections of the pipeline and AGIs cross Flood Zone 2 and 3. The Scoping Report does not provide information on scoping out the assessment of construction and decommissioning for this matter. On this basis, the Inspectorate does not agree to scope this matter out.
3.14.52	Table 18-14	Pluvial flooding (all phases)	The Scoping Report acknowledges the potential for pooling of water after prolonged rainfall events however the Inspectorate agrees that this is unlikely to result in a likely significant effect of a major accident or disaster.
3.14.53	Table 18-14	Groundwater flooding (all phases)	The Scoping Report acknowledges the potential for and increased risk in groundwater flooding during excavations during the construction phase however the Inspectorate agrees that this is unlikely to result in a likely significant effect of a major accident or disaster.
3.14.54	Table 18-14	Avalanches (all phases)	The Inspectorate agrees that this matter can be scoped out as the proposed development is not located in a risk zone for avalanches.
Natural Hazards – Climatological and Meteorological			
3.14.55	Table 18-14	Cyclones, hurricanes, typhoons, storms and gales (all phases)	The Scoping Report notes that the AGIs will be designed in line with UK standards which take into account environmental conditions including exposure to UK weather

			conditions. Noting this, significant effects are unlikely and the Inspectorate agrees that this matter can be scoped out.
3.14.56	Table 18-14	Thunderstorms (all phases)	The Scoping Report states that these events relate to temporary elevated structures during construction. The Scoping Report seeks to scope this matter out for all phases of the proposed development noting that the risk is no different to other construction projects in the locality. Table 18-14 does not consider the risk of lightning strike to elevated structures during operation such as the stack at the Coastal AGI which is proposed to be 50m high. Furthermore, the Inspectorate has noted that the justification for the scope of the assessment in relation to this matter in Table 18-13 was different, with operational effects scoped in as it was deemed that lightning strikes relate to elevated structures. Therefore, the Inspectorate is unable to agree to scope this matter out at this time.
3.14.57	Table 18-14	Wave surges (construction and decommissioning)	The Scoping Report identifies that part of the pipeline and some AGIs are likely to be located in an area at risk of tidal flooding. The Scoping Report does not provide a justification as to why this matter can be scoped out during construction and decommissioning, on this basis, the Inspectorate does not agree to scope this matter out at this stage.
3.14.58	Table 18-14 and Table 17-8	Extreme temperatures: heatwaves, low (sub-zero) temperatures and heavy snow (all phases)	The Scoping Report seeks to scope out impacts from extreme temperatures during all project phases. The Inspectorate agrees to scope out effects from sub zero temperatures and heavy snow as significant effects are unlikely. The Inspectorate notes that table 17-8 scopes in extreme weather events such as heatwaves. At this stage the Inspectorate does not agree to scope out effects on heatwaves during all phases and considers the ES should include an explanation of any significant effects which this could result in.
3.14.59	Table 18-14	Droughts (all phases)	The Scoping Report identifies a low risk in supplies of water in this location. The Inspectorate agrees that likely significant effects in relation to major accidents and disasters occurring in this location as a result of this matter are unlikely and therefore is content to scope this matter out.

3.14.60	Table 18-14	Severe space weather: solar flares severe space weather: solar energetic particles severe space weather: coronal mass ejections (all phases)	The Inspectorate notes that significant effects in relation to this matter are unlikely are unlikely and agrees matter may be scoped out of the ES.
3.14.61	Table 18-14	Wildfires: forest fire, bush/brush, pasture (all phases)	The Scoping Report notes that the proposed development does pass through some wooded and vegetated area, however, should conditions become hot and dry for a long period of time, further consideration will be given. To enable this matter to be scoped out, the ES should set out and secure what is meant by 'further consideration'.
3.14.62	Table 18-14	Fog (all phases)	The Scoping Report identifies that safety measures would be in place to manage site operations should fog become an issue during construction and that it is unlikely to be an issue during operation. The Inspectorate considers that with relevant health and safety legislation in place; this matter can be scoped out.
Natural Hazards – Biological			
3.14.63	Table 18-14	Disease epidemics and animal diseases (all phases)	The Inspectorate agrees that construction is unlikely to give rise to any disease epidemics. Therefore, this matter can be scoped out.
3.14.64	Table 18-14	Plants (all phases)	The Scoping Report notes that standard control measures would be in place during construction to handle and dispose of any diseased or invasive plants to prevent their spread. Provided that the ES should explain the mechanism through which controls would be secured, the Inspectorate is content to scope this matter out.
Technological or Manmade Hazards			
3.14.65	Table 18-14	Extensive public demonstrations	The Inspectorate is content to scope these matters out on the basis of no pathway of effect.

		Widespread damage to societies and economies The need for largescale multi-faceted humanitarian assistance The need for largescale multi-faceted humanitarian assistance The hinderance or prevention of humanitarian assistance by political and military constraints Significant security risks for humanitarian relief workers in some areas Famine Displaced populations (all phases)	
Technological or manmade hazards – industrial and urban hazards			
3.14.66	Table 18-14	Fuel storage (all phases)	The Scoping Report commits to no damage to fuel storage and consultation with fuel storage site owners. The Inspectorate agrees that noting this commitment, this matter can be scoped out, though the ES should explain how this commitment would be secured.
3.14.67	Table 18-14	Dam breaches (all phases)	The Scoping Report identifies that the pipeline crosses multiple areas at risk of reservoir flooding, however, notes a dam breach as unlikely. Emergency procedures would be issued by the emergency services should this occur. Noting this and the likelihood of the event taking place, the Inspectorate is content to scope this matter out.

3.14.68	Table 18-14	Mine and storage caverns (operation and decommissioning)	The Scoping Report identifies that the pipeline crosses multiple coal mining reporting areas and that further consultation will be undertaken. No information is provided to justify this matter not being assessed for operational and decommissioning impacts. The Inspectorate does not agree to scope this out and the considers the ES should provide an assessment where significant effects are likely.
3.14.69	Table 18-14	Fires (all phases)	The Scoping Report identifies that is it unlikely that a fire would be generated during operation of the pipeline due to the nature of the activities undertaken and substances stored. No justification has been provided for scoping this matter out for construction and decommissioning assessments. As such, the Inspectorate does not agree to scope this matter out at this stage for these phases. The ES should assess the risk of fire at all AGI's and BVSs as well as the pipeline. The applicant's attention is directed to comment from the Environment Agency at Appendix 2 to this Scoping Opinion.
Technological or manmade hazards – transport accidents			
3.14.70	Table 18-14	Road and rail (all phases)	The Inspectorate notes that appropriate mitigation will be secured in a draft CEMP. On the basis that appropriate mitigation is secured in the draft CEMP, this matter can be scoped out.
3.14.71	Table 18-14	Waterways (operation and decommissioning)	The Scoping Report identifies that multiple waterway crossings required for the pipeline and therefore this matter is scoped in. The Scoping Report does not provide a justification for scoping this matter out for operation and decommissioning and therefore the Inspectorate does not agree to scope this matter out.
3.14.72	Table 18-14	Aviation (operation and decommissioning)	The Scoping Report notes Ashcroft Airfield is located 3.5km west of the scoping boundary and Wallasey Very High Frequency Omni-Directional Range (VOR) 8km away and that close liaison with the airfield operators will be undertaken. The Scoping Report does not justify why this matter is to be scoped out for operation and decommissioning. The ES should justify this approach or include an assessment of any likely significant effects.

Technological or manmade hazards – pollution accidents			
3.14.73	Table 18-14	Air (construction and decommissioning)	The Scoping Report notes potential for a significant loss of containment event, leading to a large-scale release of CO ₂ during operation. The Scoping Report does not justify why this would not be possible during construction and decommissioning. The ES should provide this information to support the scoping out of this matter for those phases.
3.14.74	Table 18-14	Land (all phases)	The Scoping Report identifies that there is an increased risk of leaks and spillages from hazardous materials associated with construction activities. This would be controlled through commitments in the draft CEMP. The Scoping Report does not justify why this would not be possible during operation and decommissioning. The ES should provide this information to support the scoping out of this matter for those phases. Noting comments from Cheshire West and Cheshire Council in relation to the potential for interaction with Hoole Bank Tar Lagoon, the Inspectorate is not able to scope this matter out for all phases at this stage. The applicant is encouraged to discuss this matter further.
3.14.75	Table 18-14	Water (all phases)	The Scoping Report notes that during the construction phase that there is the potential for a risk of contaminating watercourses that the pipeline passes through as well as groundwater, however mitigation would be included in the draft CEMP. The Scoping Report does not justify why this would not be possible during operation and decommissioning. The ES should provide this information to support the scoping out of this matter for those phases. Noting comments from Cheshire West and Cheshire Council in relation to the potential for interaction with Hoole Bank Tar Lagoon, the Inspectorate is not able to scope this matter out for all phases at this stage. The applicant is encouraged to discuss this matter further.

3.14.76	Table 18-14	Electricity (all phases)	The Scoping Report notes a commitment to consult on and control any works required near electric overhead power lines as well as implementation of site- specific risk assessments. On the basis that appropriate mitigation through these measures is secured, this matter can be scoped out, though the ES should explain the mechanism through which controls to works would be secured.
3.14.77	Table 18-14	Gas (operation and decommissioning)	The Scoping Report notes the presence of underground transmission pipelines in the scoping boundary and that further detailed information will be sought once the routing is further developed. The Scoping Report does not provide any justification for scoping this matter out for operation and decommissioning. The Inspectorate therefore is unable to agree to scope this matter out for these phases at this stage.
3.14.78	Table 18-14	Water supply (all phases)	The Scoping Report commits to no damage to water supply assets and consultation with water supply asset owners. Providing that it is evidenced in the ES, where this commitment would be secured, the Inspectorate agrees this matter can be scoped out.
3.14.79	Table 18-14	Sewage system (all phases)	The Inspectorate notes that no use of the sewage system is require for the pipelines and therefore the Inspectorate is content to scope this matter out.
Technological or manmade hazards – malicious attacks			
3.14.80	Table 18-14	Unexploded ordnance – (operation and decommissioning)	The Scoping Report notes that part of the scoping boundary contains a UXO high risk area. The Scoping Report does not provide a justification for scoping this matter out for operation and decommissioning and therefore the Inspectorate does not agree to scope this matter out at this stage.
3.14.81	Table 18-14	Chemical / biological / radiological / nuclear transport systems	The Scoping Report identifies that the proposed development is unlikely to be a target for events such as these and therefore proposes to scope these matters out. The Inspectorate agrees this may be scoped out of the ES.

		crowded places (all phases)	
Technological or manmade hazards – engineering accidents and failures			
3.14.82	Table 18-14	Cyber – (construction and decommissioning)	The Scoping Report does not justify why this would not require assessing during construction and decommissioning. The ES should provide this information to support the scoping out of this matter for those phases.
3.14.83	Table 18-14	Bridge failure (all phases)	The Scoping Report proposed to scope this matter as no bridge works are required as part of the proposed development. The Inspectorate agrees to scope this matter out.
3.14.84	Table 18-14	Flood defence failure (all phases)	The Scoping Report identifies watercourses within the scoping boundary that benefit from flood defences and the potential for breach events would be considered in the ES which contradicts the column in Table 18-14 which identifies that this matter is to be scoped out for all phases. The Inspectorate therefore does not agree to scope this matter out.
3.14.85	Table 18-14	Mast and tower collapse (all phases)	The Scoping Report commits that any work required near an electric overhead power line would be controlled through consultation with operators and risk assessments undertaken. Provided the ES explains how this commitment will be secured, the Inspectorate agrees this matter can be scoped out.
3.14.86	Table 18-14	Property or bridge demolition accidents (operation and decommissioning)	The Scoping Report identifies that construction may involve demolition for site clearance and that control measures will be put in place through the draft CEMP with further assessment in the ES. As no demolition of property or bridges would take place during operation and decommissioning, the Inspectorate agrees this may be scoped out.
3.14.87	Table 18-14	Tunnel failure/fire (all phases)	The Scoping Report sets out that there are no tunnel structures proposed as part of the proposed development. On this basis, the Inspectorate is content to scope this matter out.

3.14.88	Table 18-14	Vessel collision (decommissioning)	The Scoping Report identifies that as the pipeline will be left in place, it is unlikely that vessels will be required for decommissioning. Noting this, the Inspectorate is content to scope this matter out for decommissioning.

ID	Ref	Description	Inspectorate's comments
3.14.89	n/a	n/a	n/a

3.15 Cumulative effects

(Scoping Report Section 19)

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

ID	Ref	Description	Inspectorate's comments
3.152	n/a	Morecambe Net Zero	It is acknowledged that the Morecambe Net Zero project would be consented separately, however in order to understand the proposed development in its entirety and to enable a robust cumulative assessment, the ES should provide a description of the offshore elements which would connect to the proposed development and explain how the consents would interact. Details of how any potential mitigation or compensation measures could be implemented should be discussed in the ES. The applicant's attention is directed to the comments from Natural England in Appendix 2 to this Scoping Opinion.
3.153	n/a	Welsh projects	The ES should ensure the assessment of cumulative effects includes consideration of projects located in Wales, such as those within the Flintshire and Wrexham authority areas. The applicant's attention is directed to comments from Natural Resources Wales in Appendix 2 to this Scoping Opinion.

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 Secretary of State for Defence	Ministry of Defence
The relevant parish council	Flint Town Council Sealand Community Council Connah's Quay Town Council Bagillt Community Council Holywell Town Council Hayfield Parish Council Edale Parish Council Green Fairfield Parish Council Wormhill Parish Council Peak Forest Parish Council Castleton Parish Council Hope Parish Council Aston Parish Council King Sterndale Parish Council Thornhill Parish Council Hartington Upper Quarter Parish Council Chapel-en-le-Frith Parish Council Whaley Bridge Town Council Chinley, Buxworth and Brownside Parish Council New Mills Parish Council Quarnford Parish Council

SCHEDULE 1 DESCRIPTION	ORGANISATION
	Leekfrith Parish Council Biddulph Town Council Horton Parish Council Rushton Parish Council Heaton Parish Council Kidsgrove Town Council Brereton Parish Council Macclesfield Town Council Crewe Town Council Haslington Parish Council Odd Rode Parish Council Moreton cum Alcumlow Parish Council Newbold Astbury Parish Council Moston Parish Council Cranage Parish Council Peover Superior and Snelson Parish Council Swettenham Parish Council Lower Withington Parish Council Siddington Parish Council Congleton Town Council Henbury Parish Council Gawsworth Parish Council Sutton Parish Council Nether Alderley Parish Council Marthall Parish Council Wilmslow Town Council Over Alderley Parish Council Prestbury Parish Council Rainow Parish Council Disley Parish Council

SCHEDULE 1 DESCRIPTION	ORGANISATION
	Wardle Parish Council Bunbury Parish Council Alraham and Calveley Community Council Stoke and Hurleston Parish Council Cholmondeston and Wettenhall Parish Council Aston Juxta Mondrum Parish Council Poole Parish Council Church Minshull Parish Council Leighton and Minshull Vernon Parish Council Warmingham Parish Council Sandbach town council Middlewich Parish Council Bradwall Parish Council Holmes Chapel Parish Council Somerford Parish Council Somerford Booths and Hulme Walfield Parish Council Eaton Parish Council Marton Parish Council Twemlow Parish Council Goostrey Parish Council Chelford Parish Council North Rode Parish Council Bosley Parish Council Great Warford Parish Council Chorley Parish Council Alderley Edge Parish Council Bollington Parish Council Mottram St Andrew Parish Council Adlington Parish Council Pott Shrigley Parish Council

SCHEDULE 1 DESCRIPTION	ORGANISATION
	Kettleshulme and Lyme Handley Parish Council Poynton with Worth Parish Council Higher Hurdsfield Parish Council Little Warford Parish Council Tattenhall and District Parish Council Tiverton and Tilstone Fearnall Parish Council Allostock Parish Council Rushton Parish Council Little Budworth Parish Council Darnhall Parish Council Winsford Town Council Sproston Parish Council Beeston Parish Council Tarporley Parish Council Bostock Parish Council Davenham Parish Council Lach Dennis and Lostock Green Parish Council Hope Woodlands Parish Council Taddington Parish Council Tideswell Parish Council Bradwell Parish Council Litton Parish Council Little Hucklow Parish Council Great Hucklow Parish Council Abney and Abney Grange Parish Council Kingsley Parish Council Cheddleton Parish Council Ipstones Parish Council Onecote Parish Council Warslow and Elkstones Parish Council

SCHEDULE 1 DESCRIPTION	ORGANISATION
	Consall Parish Council Cotton Parish Council Leek Town Council Bradnop Parish Council Waterhouses parish Council Grindon Parish Council Butterton Parish Council Wetton Parish Council Ilam Parish Council Heathylee Parish Council Fawfieldhead Parish Council Brown Edge Parish Council Endon and Stanley Parish Council Longsdon Parish Council Tittesworth Parish Council Wootton Parish Council Stanton Parish Council Backford Parish Council Little Stanney Parish Council Barrow Parish Council Thornton-le-Moors Parish Council Dunham-on-the-Hill and Hapsford Parish Council Elton Parish Council Clotton Hoofield Parish Council Duddon and Burton Parish Council Willington Parish Council Golborne David Parish Council Rowton Parish Council Littleton Parish Council Moston Parish Council

SCHEDULE 1 DESCRIPTION	ORGANISATION
	Croughton Parish Council Ince Parish Council Moulton Parish Council Aldford and Saughton Parish Council Saughall and Shotwick Park Parish Council Christleton Parish Council Mickle Trafford and District Parish Council Neston Parish Council Hargrave and Huxley Parish Council Tarvin Parish Council Utkinton and Cotebrook Parish Council Whitegate and Marton Parish Council Puddington Parish Council Ledsham Parish council Huntington Parish Council Great Boughton Parish Council Waverton Parish Council Guilden Sutton Parish Council Mollington Parish Council Upton-by-Chetser Parish Council Lea-by-Backford Parish Council Capenhurst Parish Council Hale Parish Council Frodsham Town Council Mostyn Community Council
The Environment Agency	The Environment Agency
Natural Resources Wales	Natural Resources Wales
Natural England	Natural England
Natural England Offshore Wind Farms	Natural England Offshore Wind Farms

SCHEDULE 1 DESCRIPTION	ORGANISATION
The Forestry Commission	North West and West Midlands East and East Midlands
The Historic Buildings and Monuments Commission for England (known as Historic England)	Historic England
The Canal and River Trust	The Canal and River Trust
Trinity House	Trinity House
The relevant Highways Authority	Derbyshire Dales District Highways High Peak Borough Council Highways Staffordshire Moorlands District Highways Wirral Council Highways Cheshire East Council Highways Cheshire West and Chester Council Highways Staffordshire County Council Highways Derbyshire County Council Highways National Highways
Integrated Transport Authorities (ITAs) and Passenger Transport Executives (PTEs)	Merseytravel PTE Transport for Greater Manchester
The Health and Safety Executive	Health and Safety Executive
NHS England	NHS England
The Coal Authority	Mining Remediation Authority
The Crown Estate Commissioners	The Crown Estate
The relevant police authority	Staffordshire Police Fire and Crime Commissioner Derbyshire Police and Crime Commissioner Merseyside Police and Crime Commissioner

SCHEDULE 1 DESCRIPTION	ORGANISATION
	Greater Manchester Combined Authority Cheshire Police and Crime Commissioner
The relevant ambulance service	West Midlands Ambulance Service East Midlands Ambulance Service North West Ambulance Service
The relevant fire and rescue authority	Derbyshire Fire and Rescue service Staffordshire Fire and Rescue Service Greater Manchester Fire Rescue Service Merseyside Fire and Rescue Service Cheshire Fire and Rescue Service

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 Integrated Care Board NHS Staffordshire and Stoke-on-Trent Integrated Care Board NHS Greater Manchester Integrated Care Board NHS Derby and Derbyshire Integrated Care Board NHS South Yorkshire Integrated Care Board
NHS England	NHS England
The relevant NHS Trust	East Cheshire NHS Trust East Midlands Ambulance Service Ambulance Service NHS Trust North West Ambulance Service NHS Trust
The relevant NHS Foundation Trust	Cheshire and Wirral Partnership NHS Foundation Trust Countess Of Chester Hospital NHS Foundation Trust

STATUTORY UNDERTAKER	ORGANISATION
	Mersey Care NHS Foundation Trust Midlands Partnership NHS Foundation Trust The Clatterbridge Cancer Centre NHS Foundation Trust Wirral University Hospital NHS Foundation Trust West Midlands Ambulance Service NHS Foundation Trust
Railways	Network Rail Infrastructure Ltd
Railways	National Highways Historical Railways Estate
Road Transport	Merseyside Passenger Transport Executive (Merseytravel)
Canal Or Inland Navigation Authorities	The Canal and River Trust
Universal Service Provider	Royal Mail Group
Homes and Communities Agency	Homes England
The relevant Environment Agency	The Environment Agency Natural Resources Wales
The relevant water and sewage undertaker	Severn Trent 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

STATUTORY UNDERTAKER	ORGANISATION
	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 generator with CPO Powers	Orsted Icen ESS (UK) Limited Uniper UK Limited Deeside Power (UK) LTD. Foresight Group Lightsource 204 Limited Liverpool City Region Combined Authority RWE Generation UK PLC
The relevant electricity distributor with CPO Powers	SP Electricity North West National Grid Electricity Distribution (West Midlands) Limited SP Manweb Plc Advanced Electricity Networks Ltd 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

STATUTORY UNDERTAKER	ORGANISATION
	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	
The relevant electricity interconnector with CPO Powers	Getlink Projects 2 LTD.

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

LOCAL AUTHORITY
Amber Valley Borough Council
Barnsley Metropolitan Borough Council
Barnsley Metropolitan Borough Council
Birmingham City Council
Cheshire East Council
Cheshire West and Chester Council
City of Wolverhampton Council
Derby City Council
Derbyshire County Council

LOCAL AUTHORITY
Derbyshire Dales District Council
Dudley Metropolitan Borough Council
Dudley Metropolitan Borough Council
East Staffordshire Borough Council
Flintshire County Council
Halton Borough Council
High Peak Borough Council
Kirklees Council
Leicestershire County Council
Liverpool City Council
Manchester City Council
Newcastle-under-Lyme Borough Council
North East Derbyshire District Council
Nottinghamshire County Council
Oldham Council
Peak District National Park Authority
Rotherham Metropolitan Borough Council
Sefton Council
Sheffield City Council
Shropshire Council
South Derbyshire District Council
Stafford Borough Council
Staffordshire County Council
Staffordshire Moorlands District Council

LOCAL AUTHORITY
Stockport Metropolitan Borough Council
Stoke-on-Trent City Council
Tameside Metropolitan Borough Council
Telford & Wrekin Council
Trafford Council
Walsall Council
Warrington Borough Council
Warwickshire County Council
Wirral Council
Worcestershire County Council
Wrexham County Borough Council

TABLE A5: THE MARINE MANAGEMENT ORGANISATION

Section 42(1)(a) of the PA2008 requires consultation with the Marine Management Organisation in any case where the proposed development would affect, or would be likely to affect, any of the areas specified in subsection 42(2).

ORGANISATION
The Marine Management Organisation

APPENDIX 2: RESPONDENTS TO CONSULTATION AND COPIES OF REPLIES

CONSULTATION BODIES WHO REPLIED BY THE STATUTORY DEADLINE:
Allostock Parish Council
Amber Valley Borough Council
Bagillt Community Council
Birmingham City Council
Canal and River Trust
Cheshire East Council
Cheshire West and Chester Council
Coal Authority
Congleton Town Council
Cranage Parish Council
Derwent Hope Woodlands Parish Council
Environment Agency
Forestry Commission
Flint Town Council
Goostrey Parish Council
Great Borough Parish Council
Hartington Upper Quarter Parish Council
Health and Safety Executive
High Peak Borough Council
Historic England
Kirklees Council
Marine Management Organisation

Marton Parish Council
Moston Parish Council
National Gas Transmission
National Grid Electricity Transmission
Natural England
Natural Resources Wales
Network Rail
North Rode Parish Council
Onecote Parish Council
Orsted
Peak District National Park Authority
Prestby Parish Council
Rotherham Metropolitan Borough Council
Royal Mail
Severn Trent Water
Sheffield City Council
Somerford Parish Council
SP Energy Networks
Stafford Borough Council
Staffordshire County Council
Staffordshire Fire and Rescue
Stockpot Council
Stoke on Trent City Council
Teddington and Priestcliffe Parish Council
Trinity House
Warrington Borough Council

West Midlands Ambulance Service
Wirral Council
Worcestershire County Council

From: [REDACTED]
To: [Peak Cluster CCS Pipeline](#)
Subject: Response from Allostock Parish Council
Date: 09 February 2026 10:16:11

[You don't often get email from clerk@allostockparishcouncil.gov.uk. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

Allostock Parish Council makes the following comments:

Peak Cluster Pipeline.

This is a huge project and the map shows a wide corridor crossing many properties and valuable farmland.

This has the potential to disrupt many lives and businesses as well as destroying wild life habitat.

The area close to us at Holmes Chapel appears to be an above ground section and as such will be unsightly in this rural area.

In our opinion the problems outweigh the advantages which are unproven.

Allostock Parish Council.



**Chief Executive
Development Management**

Town Hall
Ripley
Derbyshire DE5 3BT
Tel: 01773 570222
Email: enquiry@ambervalley.gov.uk
Web: www.ambervalley.gov.uk

**The Planning Inspectorate
C/o Quadient
69 Buckingham Avenue
Slough
SL1 4PN**

Our Ref : ALANR-COR/2026/0003
Your Ref :
Date : 4 February 2026
Ask For :
Direct Dial :
Email : @ambervalley.gov.uk

Dear

Proposal	Request for comments on Scoping Opinion in relation to the Peak Cluster CCS Pipeline
Location	Boroughwide Derbyshire
Applicant	The Planning Inspectorate C/o Quadient 69 Buckingham Avenue

Thank you for your letter received on 13 January 2026.

Having considered the information submitted, Amber Valley Borough Council has no comments to make in respect of the proposed scoping opinion.

Yours sincerely

Planning Manager.

From: [Clerk - Bagillt CC](#)
To: [Peak Cluster CCS Pipeline](#)
Subject: RE: EN0710001 - Peak Cluster CCS Pipeline - EIA Scoping Consultation and Notification
Date: 26 January 2026 13:40:54
Attachments: [image007.png](#)
[image008.png](#)
[image009.png](#)
[image011.png](#)
[image012.png](#)
[image013.png](#)
[image001.png](#)

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Please find comments from Bagillt Community Council.

Bagillt Community Council – Response to the Proposed Peak Cluster CCS Pipeline (Scoping Opinion)

Bagillt Community Council has considered the proposed Peak Cluster Carbon Capture and Storage (CCS) Pipeline and wishes to submit the following observations for the Scoping Opinion:

1. Impact on Local Communities

Bagillt is concerned about the potential impacts of the proposed development on our constituents and neighbouring villages, including Greenfield and Mostyn. We stress that communities in the pipeline corridor and surrounding areas need to be considered fully in both environmental and logistical assessments.

2. Protected Sites and Ecology

We note that there are Sites of Special Scientific Interest (SSSI) along the riverside in Bagillt. The Environmental Statement should carefully assess any impacts on these sites. In addition, the ecology of the Dee Estuary is of high importance and must be thoroughly evaluated, particularly in relation to potential coastal and marine effects.

3. Coastal and Estuarine Considerations

We recommend that the developers engage with the Dee Estuary Strategy to assess potential impacts on coastal processes, including erosion and sediment transport, from the proposed pipeline.

4. Cumulative Impacts

Even though the pipeline does not appear to pass directly through Bagillt, the Environmental Statement should consider cumulative impacts in the region, including other Nationally Significant Infrastructure Projects (NSIPs) such as the Connah's Quay Low Carbon Power project and the HyNet developments.

5. Transboundary Effects

Potential impacts on the marine environment, particularly the Dee Estuary and Irish Sea during offshore construction, should be fully scoped and addressed.

Bagillt Community Council looks forward to reviewing the full Environmental Statement and requests that the council, our constituents, and neighbouring villages are actively considered in all stages of assessment, with particular regard to environmental, ecological, and community impacts.

From: [REDACTED]
To: [Peak Cluster CCS Pipeline](#)
Subject: RE: EN0710001 - Peak Cluster CCS Pipeline - EIA Scoping Consultation and Notification
Date: 21 January 2026 15:46:32
Attachments: [image001.jpg](#)
[image003.png](#)
[image004.png](#)
[image006.png](#)
[image007.png](#)
[image008.png](#)
[image002.png](#)

You don't often get email from [REDACTED]@birmingham.gov.uk. [Learn why this is important](#)

Dear [REDACTED],

Thanks for the clarification. I can confirm that Birmingham City Council has no comments to make on the Scoping Opinion.

Kind regards,

[REDACTED]

[REDACTED] | Planning Management Specialist | Planning and Development | Place, Prosperity and Sustainability | Birmingham City Council
[REDACTED]@birmingham.gov.uk

Please note that any views expressed in this email and/or attachments constitute an informal officer opinion only and are given without prejudice to the determination of any planning application or to the views of the Planning Committee. Under the Freedom of Information Act 2000, information you provide may be made available for public inspection.



OFFICIAL

From: Peak Cluster CCS Pipeline <PeakClusterCCS@planninginspectorate.gov.uk>
Sent: 21 January 2026 14:58
To: [REDACTED]@birmingham.gov.uk>; Peak Cluster CCS Pipeline <PeakClusterCCS@planninginspectorate.gov.uk>
Subject: RE: EN0710001 - Peak Cluster CCS Pipeline - EIA Scoping Consultation and Notification

You don't often get email from peakclusterccs@planninginspectorate.gov.uk. [Learn why this is important](#)

Dear [REDACTED]

Thank you for your email. I can confirm that the GIS system we use to identify consultees, identified 'Birmingham Districts' as a neighbouring authority to the host authority on the excel spreadsheet. I attach a copy of the GIS map output which I hope will clarify. Please let me know if you have any further queries.

Best wishes

[REDACTED]

From: [REDACTED]@birmingham.gov.uk>
Sent: 21 January 2026 12:06
To: Peak Cluster CCS Pipeline <PeakClusterCCS@planninginspectorate.gov.uk>
Subject: RE: EN0710001 - Peak Cluster CCS Pipeline - EIA Scoping Consultation and Notification
Importance: High

|

You don't often get email from eddie.wrench@birmingham.gov.uk. [Learn why this is important](#)

Good afternoon [REDACTED]

I have had a look at the proposals and they seem to be a long way from Birmingham's borders. Can I ask if we were meant to be consulted, as I couldn't see how we fitted into the relevant 'consultation bodies' defined in The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 (as amended)? Thanks

Kind regards,

[REDACTED]

[REDACTED] | Planning Management Specialist | Planning and Development | Place, Prosperity and Sustainability | Birmingham City Council
[REDACTED]

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OFFICIAL

OFFICIAL

From: Peak Cluster CCS Pipeline <PeakClusterCCS@planninginspectorate.gov.uk>

Sent: 13 January 2026 15:18

Subject: EN0710001 - Peak Cluster CCS Pipeline - EIA Scoping Consultation and Notification

You don't often get email from peakclusterccs@planninginspectorate.gov.uk. [Learn why this is important](#)

Dear Sir/Madam

FAO: Head of Planning

Please see attached correspondence on the proposed Peak Cluster CCS Pipeline.

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 February 2026**. The deadline is a statutory requirement that cannot be extended. Further information is included within the attached letter.

Kind regards

[REDACTED]



[REDACTED] | Environmental Advisor
The Planning Inspectorate



Secretary of State
The Planning Inspectorate
Environmental Services
Temple Quay House
2 The Square
Bristol
BS1 6PN

Your Ref EN0710001

Our Ref

Tuesday 10th February 2026

BY EMAIL ONLY PeakClusterCCS@planninginspectorate.gov.uk

Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) – Regulations 10 and 11

Application by Peak Cluster Limited (the applicant) for an Order granting Development Consent for the Peak Cluster CCS Pipeline (the proposed development)

Thank you for your consultation on the Environmental Impact Assessment Scoping Opinion.

We are the charity who look after and bring to life 2000 miles of canals & rivers. Our waterways contribute to the health and wellbeing of local communities and economies, creating attractive and connected places to live, work, volunteer and spend leisure time. These historic, natural and cultural assets form part of the strategic and local green-blue infrastructure network, linking urban and rural communities as well as habitats. By caring for our waterways and promoting their use we believe we can improve the wellbeing of our nation.

The Peak Cluster Limited proposals comprise four onshore Carbon Capture Facilities and a transportation CO2 pipeline to Mean Low Water Springs (MLWS) along with required above ground installations (AGI).

A preliminary pipeline scoping corridor has been identified, including alternative routes at some key locations, which is approximately 300m wide. It is understood that the final pipeline corridor route is subject to change following further investigation. The pipeline corridor will cross the Canal & River Trust's (the Trust) network and interact with our assets in numerous places, including construction works and routes.

Within the scoping boundary presented the Trust own, manage and operate respective sections of the Trent & Mersey Canal, Shropshire Union Canal, Macclesfield Canal, Peak Forest Canal, and two feeder channels to Rudyard Reservoir and Combs Reservoir.

As land owner and operator of the waterways the Trust would wish to see any potential impacts on: our waterway users (boaters and moorings, towpath users and wildlife); infrastructure (canals, bridges, culverts, towpaths, and embankments etc); and the habitats that our waterway support, fully identified and addressed within the Environmental Statement (ES) and supporting application documents. It would be important to safeguard the environmental quality, structural integrity and navigational safety along the Trust's waterways during construction and operation of the proposed development.

The Scoping Report provides information on the likely nature and form of the proposed development and identifies areas of potential impacts. The proposed methodologies identified in the report appear to be broadly appropriate.

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The Trust consider that it is necessary that the following matters should be considered within the Environmental Statement. These are ordered to reflect the chapters within the Scoping Report.

Chapter 5 - Air Quality

The Trust agree that assessment of dust emissions during construction should be scoped into the ES. Any assessment of construction dust should include Trust waterways, canal corridors, along with their users (for boaters (including leisure and residential moorings), towpath users and wildlife) as sensitive receptors. Any further 'dust assessment' and appropriate dust mitigation measures to be outlined in any OCEMP or CEMP(s) should fully consider any impact and mitigation required for the above receptors.

Chapter 6 – Biodiversity

The Trust's canal corridors and waterways can support rich ecology and biodiversity and the potential impacts on the ecological value of these should be fully considered within the ES and should detail appropriate and proportionate mitigation, where applicable.

The Scoping Report states (paragraph 6.5.1) that the Scoping Boundary intersects forty five Water Framework Directive (WFD) river waterbody catchments which may potentially be directly or indirectly impacted by the proposed development. At this stage, the exact nature, location and extent of watercourse impacts is not known and investigation is ongoing. The WFD waterbody catchments, are listed at Appendix E, however canals are not included. The Trust would seek clarification that respective canal operational catchments are to be included within the reviews of WFD catchments.

The Priority Habitat Inventory Habitats Table (page 126 – Volume 1) does not include Todbrook and Combs Reservoirs under Standing Open Waters (eutrophic standing waters) priority habitat. They are identified as SSSI's in the Scoping Report however they are also a priority habitat, which should be recognised.

The proposed development has the potential to influence how canals function as wildlife corridors and disrupt connectivity across the landscape. Pipeline installation can be invasive and destructive amongst boundary habitats, which fragments riparian habitat zones alongside waterway corridors and this displaces species that rely on these connecting features and disrupts ecological connectivity and wildlife movement. It is important to recognise that these impacts are not necessarily localised, as canals serve as biodiversity corridors through rural and urban landscapes. Removing vegetation can contribute to increased erosion, flood risk, and increased pollution risk, which has the potential to travel long distances within the canal ecosystem.

As mitigation, the method of pipeline construction close to canal corridors should be as minimally invasive as possible, (trenchless techniques) leave a minimal footprint, and ensure that appropriate boundary habitats are protected and retained, or replaced to maintain connectivity. Any construction works and/or pipe connection that would cross the corridor would need to consider any potential impacts on habitats along waterways, e.g. vibration, excavation, habitat loss or fragmentation or sediment mobilisation and include protection from water and light pollution.

The current Study Area interacts with the Trust's waterways outlined above. The ES should include consideration of these waterways appropriately within the aquatic ecology element, and the value of the ecological habitat, connectivity, and water quality, and any potential impact, should be identified and assessed in the ES, providing mitigation and enhancement where appropriate.

Measures to safeguard the ecological value of the Trust waterbodies should be included in any Outline Construction Environmental Management Plan (OCEMP) prepared to support the DCO application.

In terms of mitigation and biodiversity net gain there may be potential to consider compensatory planting along our waterways on Trust land in the vicinity of the crossings.

Chapter 7 – Landscape and Visual

The Trust's waterway and towpath network are recognised corridors for boating, recreational routes and outdoor provision, and active travel for local communities, which are well frequented for their amenity value. There are potentially significant temporary effects during the construction and permanent visual effects post completion

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(built form, infrastructure and any removal of vegetation) which would affect the current character, tranquillity and experience of the relevant waterways, which should be fully considered in any ES or visual assessment.

It is understood that the intention is for the pipeline to be underground along its length, including underneath the canals, which would be appropriate to help mitigate any long term visual impact along waterway corridors. Each crossing of the waterways should be subject to careful assessment, consideration and mitigation appropriate to the character of the area, including landscaping removal. The impact of lighting (temporary and permanent) within the pipeline corridor would need to be assessed and mitigated accordingly.

The canal network would be affected during the construction phase, although currently canal viewpoints haven't been included as the bare-earth ZTVs and the 10 km capture-facility LVIA buffer does not show any visibility from canal corridors. The canal is a high-sensitivity recreational receptor, and given its long, open sightlines, the potential for distant views of taller structures cannot be ruled out until refined ZTVs (including vegetation and built form) have been produced.

Chapter 7 outlines that viewpoint selection will be refined as design parameters develop and through ongoing consultation. The Trust request that representative viewpoints are considered at the PEIR or ES stage to include the canal corridor as the scheme develops, to allow any emerging visibility and cumulative effects on the canal to be assessed if later ZTVs indicate potential impacts.

Table 7-7 lists PRow's, promoted routes, the National Cycle Network and recreational users, as receptors however canals and towpaths aren't referenced at this stage. They function as public linear routes with high-sensitivity user groups and should be explicitly included within the visual receptor typology. It would be appropriate for canals and towpaths to be clearly identified within the receptor typology, with viewpoints added where relevant at the PEIR/ES stages, to ensure that any construction-phase and operational effects on the canal corridor are fully assessed as the ZTV modelling and design work progresses.

The users of waterways (including water and towpath/footpath users such as walkers, and boaters and residential moorings) should be recognised as potential receptors within any LVIA/visual assessment, and should be acknowledged in representative viewpoints, based on the value of the landscape character and amenity of waterways. Boaters should be included as receptors that are likely to experience views of the proposal as they will experience transient views of the site at a slow pace like passing walkers.

Chapter 8 - Transport

The preliminary pipeline scoping corridor identified still includes alternative routes and is subject to further investigation to finalise its route. The exact construction vehicle routes for the project are not yet known. The preliminary corridor will interact with the Trust's network at numerous points, including where pipeline infrastructure would be installed adjacent to and under waterways and where construction and/or access routes are carried over Trust land or waterway corridors by canal bridge structures.

Chapter 8 (3.2.69) outlines that the Scoping Boundary does 'not include mitigation land, off-route access roads, temporary compounds and connections to local utilities that may be required as the locations of these are not yet known', and the Trust welcome that the above will be included in the Draft Order Limits and the Environmental Assessment. The Trust welcomes (8.3.1) that the Study Area will include the highway links, bus routes, pedestrian and cycle networks, railways and navigable waterways which could potentially be impacted.

Chapter 8 outlines it is assumed that construction HGVs will travel to the site via the Strategic Road Network (SRN) and primary road network and then use the **most appropriate local routes**. Further detail on the specific roads to be used will be presented within both the PEIR and ES. The Scoping Report acknowledges that traffic and transport impacts have the potential to go beyond the Scoping Boundary, and these would be assessed within the PEIR and ES.

Section 8.4 of Chapter 8 outlines the key highway links (motorways, A and B roads) within the Scoping Boundary or that would provide access to respective sections of pipeline. A preliminary review of the SRN outlined is that the Trust's network interacts with these routes including bridges, and there is further potential for canal bridges in the Local Road Network to interact with the construction routes that will serve the proposed development.

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These bridges are located on the A530, A54, B5053 and the B6062 and not all are suitable for construction vehicles or have dimensional constraints. There are numerous Trust owned bridges within the current Scoping Boundary, which are accommodation bridges or are constrained by dimension and/or capacity, which would influence the type of traffic that can traverse these bridges.

The Trust consider that the ES should include an assessment of the potential impacts of traffic movement, associated with the proposed development, on canal and bridge infrastructure where the highway network is carried over waterways. Canal bridges can have dimensional constraints or weight limits that may affect proposed construction traffic routes and could make them susceptible to damage from HGV traffic.

Of particular note would be the use of accommodation bridges owned by the Trust. The Trust has different obligations maintaining such bridges in comparison with public road bridges. When the canals were built, the accommodation bridges were built to connect land which was severed by the new canal. The obligation of the Trust to maintain these bridges is to enable them to carry a load equivalent of that using the bridge at the time it was built. Ordinarily, this was horse-drawn carts which is considered the equivalent of a 3-tonne maximum gross vehicle weight. The Trust has no obligation to maintain such a bridge at any greater capacity. As a consequence, the use of accommodation bridges by vehicles heavier than 3 tonnes may increase the risk of harm to both users of the structure and waterway beneath.

Any proposed use of such bridge infrastructure, during any phase, should consider the potential impact to bridge structures (in dimensional and loading capacity). Construction traffic routing should avoid constrained bridges unless structural capacity assessments confirm suitability.

The Scoping Report outlines that prior to construction, a Construction Environmental Management Plans (CEMP) and Traffic Management Plan(s) (TMP) will be prepared to demonstrate how traffic that may arise because of the project will be managed. The Trust would seek for any mitigation required or protection of its structures to be mitigated in any such guiding documents going forward.

The Scoping Report states that the receptors will be identified once construction routes are known and the Study Area is defined. The Trust welcome that waterways users are recognised with regard to potential temporary effects in Chapter 8. It would be appropriate for users of waterways, towpaths and recreational routes near waterways to be considered as receptors in any assessment.

Any indivisible abnormal load movements, travelling across our structures, must be notified to the Trust via the ESDAL website or by email to abnormal.loads@canalrivertrust.org.uk and a minimum of 7 clear working days' notice is required to allow the Trust to respond to proposed vehicle movements across a Trust structure.

Access for the Trust can be required 24/7 on operational grounds along access routes or in proximity to our network, and this access needs to be retained for the Trust at all times., during all phases of the proposed development.

Any temporary stoppages or towpath closures required in connection with the proposed development, including any underground pipeline crossing, should be considered well in advance of the works. These should be minimised and, for any stoppages required, measures put in place to minimise any impact on the navigation and users of the waterway. Typically stoppages of the waterway will only be permitted in the winter stoppage season, with nine months' advance notice. The applicant is advised to discuss potential stoppages as soon as possible.

It is the statutory duty of the Trust to safeguard and maintain the navigational safety and function of its waterways. The navigational safety, minimum navigation dimensions, and use of the Trust's waterways should not be prejudiced by the proposed development at any stage.

Chapter 9 - Noise and Vibration

The Trust agree that the potential effects of noise and vibration should be considered in the ES. Our following comments should be cross referenced with our comments in relation to Chapter 14: Socio-economics and Chapter 15: Human Health.

The waterway corridors are tranquil spaces and contribute to the health and wellbeing of nearby residents and users (boaters (including those using leisure and residential moorings) and tow path users (including anglers,

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commuters, and other recreational users). The proposed development, during construction and operation, has the potential to impact on the amenities of users of the waterway from noise and vibration.

Chapter 9 outlines that noise sensitive receptors include residential properties, sensitive commercial and community uses and public open spaces (including Public Rights of Way) and that the baseline will be further refined to account for all noise sensitive receptors within the Study Area, including non-residential properties and public open spaces. Where Trust waterways fall within the Study Area, residential moorings and users of waterways (including walkers along towpaths, boating facilities and boaters) should be considered as receptors in terms of noise and vibration, and considered in any mitigation proposal.

The undergrounding of any pipe can potentially affect the structural integrity of canal infrastructure, which is not built to modern engineering standards and can be susceptible to vibration impacts. Any works to install pipes below or over the canal would need to be carefully managed to avoid any significant vibration that could adversely impact the stability of the waterway.

Chapter 10 – Historic Environment

The waterway network and corridors within and in close proximity to the scoping boundary include formal heritage and non-designated heritage assets. The pipeline route is to be finalised and the scoping corridor will be further refined down to an approximately 100 m wide boundary, which will form the boundary for the final application. Whilst large proportions are underground, given the requirement for above ground infrastructure and construction works, it is appropriate that effects on the historic environment should be scoped into the ES.

The initial baseline has been reviewed, and within the Appendices, there are a number Conservation Areas and listed structures along canal corridors that have not been plotted on the Figures 10-1.A-G which shows the location of designated heritage assets. The baseline tables in Appendix H (showing designated assets recorded within the 1 km and 5 km Study Areas) does not include, for example, Chester Canal, Trent & Mersy – Kent Green, Middlewich and Macclesfield Conservation Areas, which should be included in any ES.

Canal Conservation Areas are composed of low-lying but iconic structures in the landscape such as milestones, locks and bridges (many of which are listed buildings) and rural open landscapes, and vistas are often important to their setting. There is often commentary within canal conservation area appraisals on the importance of landscape setting to individual character zones. All conservation areas and their settings should be included in the baseline.

The Trust's networks of waterways and towpaths interact with the Scoping Boundary in numerous places, which currently excludes construction routes, and our respective heritage designations and value could experience significant impacts to their significance and settings from the proposed development, during both construction and permanently once completed. The extent of the works, including construction routes, could impact a number of canal related listed assets including bridges, locks, tunnels and milepost markers.

After reviewing the initial historic environment baseline information, Canal Conservation Areas, listed canal structures, Scheduled Monuments and their settings within the scoping boundary should be included in the baseline and any assessment. The potential impact on the above designated and non-designated canal related heritage assets should be considered in any submitted ES, including physical impact and potential impact on their significance and setting.

Chapter 10 outlines that the significance of environmental effect is typically a function of the value (Table 10-6) of a receptor and the magnitude (Table 10-7) of an impact. Each heritage asset relevant to the assessment will be assigned a value in accordance with the criteria in Table 10-6, which indicates that Grade II listed buildings are considered to be of Medium Value. Section 66 of the Act does not differentiate between listed building grading and has the same duty in respect to setting considerations as for alteration/extension/demolition works. The consideration given to a Grade II listed building should be based on particular sensitivity of any building type to change as well as listed grading. All listed buildings are of special interest and are nationally important and should be protected accordingly.

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Chapter 11 – Water Environment

The Trust concur that a Water Environment impact assessment should be scoped into the ES. There are numerous watercourses within the Study Area, which will need to be assessed to understand the level of impact from all phases of the proposed development.

Any assessment of potential impact on the Water Environment in the ES should include the Trust's canals, feeder channels and reservoirs, during all phases of the proposed development, in relation to impact on water quality, flood risk, water management and drainage routes as it could affect both the water quality and quantity within our network.

It is noted that the potential impact on water quality is dependent on numerous factors and as the Water Environment baseline develops, so will the consideration of downstream water feature attributes. Trust assets (canals) should be explicitly mentioned alongside other water courses, recognising that they are as vulnerable as main rivers and ordinary watercourses with respect to flooding, siltation, run-off, pollution and contamination. The baseline identifies specific canal crossings within the baseline for each relevant pipeline section however canals and reservoirs, and feeder channels, should also be included as receptors.

Table 11-12 classifies the importance of water receptors however canals are not included. The current wording implies that canals could be categorised as 'low' or 'negligible' importance, which does not accurately reflect the ecological diversity and functional value of canal habitats. They should also be explicitly recognised as **receptors** in assessments given their ecological value and role within the wider water environment.

Canals and reservoirs within the Study Area are already identified as potential **sources** of flood risk. All sources of flood risk should be considered.

The scope and methodology in Section 11.8 does not mention the impact on supply to the canal, during the works. Consideration must also be given to the water supply to the Trust's network, which includes feeders into reservoirs, reservoirs into canals, and surface water feeds to canals, which are separate to any reservoir feed. Additionally, any water control structures should not be compromised (e.g. weirs, sluices, and outfall discharges) in the interests of safeguarding water management.

During construction, the details of how any water is to be captured, treated and disposed of should be considered in proximity to the water crossings, in terms of dewatering excavations and trenches. The Scoping Report refers to new temporary access tracks being needed alongside the pipeline, and that these may require some crossings of watercourses. As temporary works these are likely to be a combination of culverts on smaller watercourses and clear-span structures on larger watercourses. It is welcomed that measures will be put in place to minimise the potential for adverse impacts, which should include maintenance of drainage flows to prevent backing up, situation or blockage of culverts and drainage channels near our infrastructure.

The route corridors could impact a number of watercourses and ditches which pass under our waterways via culverts, or in some instances, discharge into the canals. These would need to be located and protected to ensure the potential for silty waters or contaminants entering the canal is mitigated.

Drainage methods used for development can have significant impacts on waterways, and as such the Trust would seek to have drainage details of the proposed development clarified to ensure it is carried out in a safe and appropriate manner to safeguard the water quality and quantity of our network. Regard would also need to be given to run-off and surface water discharge from the construction compounds. Please note that the Trust is not a land drainage authority, and our explicit consent would be required for surface water discharges.

Any OCEMP or CEMP, or management plans, for various phases (a Water Management Plan (WMP), Water Quality Monitoring Plan, Emergency Response Plan, and a Dewatering Strategy) should include waterway protection measures and mitigation for canals and feeder channels.

Chapter 13 – Ground Conditions

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It is welcomed that Chapter 13 considers geology and ground conditions, in relation to potential contamination however the Trust consider that an assessment of ground conditions with regard to land stability should also be considered as outlined below.

The potential impact of the construction, operation and decommissioning of the proposed development upon the Trust's watercourses with regard to contamination should be included in any assessment, including the Phase 1 Preliminary Risk assessment. It should be explicit that the Trust's canals and feeder channels would be included in the Study Area as watercourses are identified the scoping boundary.

Chapter 13 refers to ongoing ground investigation and UXO assessment, to assess the potential risks to human health, controlled waters and the environment. Any contamination assessment should consider the Trust's watercourses as receptors, with regard to potential pollution pathways within conceptual models and the watercourses should be protected from potential pollution from contaminated sources during any phase of the proposed development. The Trust concur with potential effects identified for Ground Conditions and Geology in section 13.6, which also identifies the following:

- *Permeable strata surrounding the pipeline may provide a preferential pathway for contaminants to migrate into non-contaminated soils, geology and groundwater; and*
- *Potential for aggressive ground conditions posing a risk to the pipeline.*

These may be significant given the potential for a) long migration routes to be created, and b) any groundwater bodies with a high brine content (more prevalent on the westerly parts of the proposed development).

The identification of potential effects to watercourses, including Trust canals and feeder channels, should be identified and mitigated accordingly and waterway protection measures should be put in place (dewatering/mobilisation of contaminants).

The Trust concur with the mitigation identified at this stage. Any OCEMP should include details of working practices or mitigation measures to reduce or eliminate dust generation, unintentional runoff from exposed soils, dust or excavation, specific measures required in relation to potentially contaminated ground and include an environmental pollution emergency response protocol in the event of any environmental pollution taking place (which references the Canal & River Trust where applicable). At operational stage, the Trust support the preparation of an Environmental Management System and Surface Water Drainage Plan (SWDP) to control potential impacts from pollution to surface watercourses.

Development and construction works under, over or in proximity to waterway infrastructure has the potential to adversely affect its structural integrity, during construction and long term, by reason of excavation, earthmoving, drilling, boring, vibrations or the tracking of plant and machinery, loading, drainage and water management.

Ground conditions will influence the design, route, construction, and long-term maintenance of the pipeline network. There is minimal reference to geotechnical constraints in Chapter 13, to assess land stability and potential adverse environmental affects.

Chapter 13 should also assess geology and ground conditions with regard to the works potentially affecting land stability, to ascertain that no construction works or development in close proximity to or under any canal, feeder or earth structure supporting the waterway infrastructure would adversely affect its structural integrity. Where the route is to pass over or within 250m of a canal and navigable waterway, the Trust should be provided with the relevant geoenvironmental and geotechnical assessments for review and comment.

Appropriate construction practice and environmental management, in any OCEMP or CEMP, following assessment of ground conditions, can help to mitigate potential impact on stability and appropriate construction and protection measures should be employed to safeguard land stability. At this stage, it is unclear how close construction traffic, plant and machinery would reach waterway corridors, and such activities have the potential to impact the waterway infrastructure from surcharging or loading. An appropriate buffer should be provided to waterways and or earth structures, where no plant, machinery or construction traffic should track or materials be stored.

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Any trees to be removed in the vicinity of the canals or supporting infrastructure should include a methodology for removing trees and treating the roots to prevent shrinkage whilst ensuring that the integrity of the canal is maintained and protected.

The construction technique and method of works would also need to be carried out in accordance with the Canal & River Trust Code of Practice. <https://canalrivertrust.org.uk/business-and-trade/undertaking-works-on-our-property-and-our-code-of-practice>. Part 2 of the Code of Practice refers to service crossings and it does not permit overhead utility crossings

Chapter 14 – Socio-economic

Trust assets (waterways and reservoirs) are recognised for recreational pursuits, contributing to local economy, tourism and health and well-being as an opportunity for outdoor activities and sustainable active travel. Waterways should be acknowledged as important recreational and tourism features for local communities as part of the assessment to be safeguarded from adverse impacts associated with the proposed development.

Impacts on the landscape and visual character of our waterway network or impacts to boat movements could impact the attractiveness of our network, with potential economic consequences. There are visitor and commercial moorings across the network and temporary or permanent closure of these during development could impact the local visitor economy. We request that this is considered as part of the ES. Any potential impact upon waterway recreational functions, businesses and moorings (e.g. boaters, anglers) should be included in any assessment upon surrounding tourism and recreational amenity.

The Trust owns numerous watercourses within the scoping boundary and that may be crossed by the pipeline.. Any development should not compromise the safe operation or navigation of the Trust's waterways or compromise its navigational envelope.

Chapter 15 – Human Health

The Trust agree that potential effects on human health should be scoped in any ES. Chapter 15 highlights that there is evidence linking contact and exposure to the natural environment with improved health and wellbeing and that the design and use of the built and natural environment are key determinants of health and well being.

The Trust's network can contribute to supporting the health and well-being of communities and visitors through the provision of access to a network of free blue and green spaces, that foster social interaction, promote physical activity, walking and cycling, connection with nature, and provide active travel routes. They provide a calm space for relaxation and contemplation, for angling and other activities to connect with nature, as well as activities on the water such as boating, paddle boarding and canoeing.

The Trust has published an Impact Report which evidences the benefit of our blue/ green infrastructure and shows how communities are benefitting from using and engaging with our network of canals. Our network is one of the UK's largest free-to-access blue spaces. The annual social value being generated by our network and activities is £4.6 billion including £1.1 billion cost savings to NHS derived from active use of the waterways and the towpaths.

[Our impact | Canal & River Trust \(canalrivertrust.org.uk\)](https://canalrivertrust.org.uk)

Our network can provide ready and easy access to blue-green space, the outdoors and nature, opportunities to connect people to place, nature and each other, and bolster physical activity and a sense of belonging which all contributes to the health and wellbeing of nearby residents and recreational users. These opportunities and interactions could be affected by the potential issues highlighted in Chapter 15, whereby potential changes to air quality, noise and vibration, landscape and visual amenity, connectivity and access to welcoming towpaths, tranquil environments, and water-related recreation could be impacted.

Given the potential opportunities that access to our network can provide, the Trust would seek for the potential impact on the opportunities offered by the waterway network to be considered including its contribution to providing access to connectivity, recreation and blue/green space provision. The Trust consider that users of the network, including residential moorings, boaters and users of canal towpaths to be considered as receptors and considered in any mitigation proposal.

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Cumulative Impacts

There is potential for the pipeline corridor to interact with Hynet hydrogen pipeline, Hynet CO2 pipeline and HS2 safeguarded land, which should be included in consideration of other major projects in the area and consideration of cumulative impacts.

Comments as land owner and statutory undertaker

From our experience with NSIPs and other major infrastructure, we understand that often detailed design will come forward after consent. In order to address the Trust's likely concerns about the proposed development (which will be broadly understood from the above comments on the proposed environmental impact assessment and the assessment itself), at the consenting stage, the Trust will seek protective provisions in the DCO. The standard protective provisions for the Trust ensure undertakers work with the Trust to design, construct, operate and maintain their new infrastructure in a way that minimises impact on the Trust's network. They secure collaborative working and cost recovery through the Trust's Code of Practice. The Trust's Code of Practice is referenced above and can be found at: <https://canalrivertrust.org.uk/business-and-trade/undertaking-works-on-our-property-and-our-code-of-practice>. The Trust created the Code of Practice to provide to all third parties working in and around the Trust's network with expectations, standards and processes to ensure the integrity and safety of the network, safeguard operations and conserve its heritage and the natural environment, in line with its statutory duties and charitable objectives. We expect most concerns raised by the Trust, about the proposed development, will be adequately addressed through the standard protective provisions.

As a statutory undertaker, the Trust would challenge a DCO application seeking compulsory acquisition powers over its land as it is willing to enter into voluntary agreements for the rights the proposed development may require. It may be that agreements for land and rights can also contain mitigation for assessed impacts of the proposed development on the Trust's network.

The applicant is advised to contact the Canal & River Trust's Works Engineering Team at Enquiries.TPWNorth@canalrivertrust.org.uk for more information about the Code of Practice, which is available at (<https://canalrivertrust.org.uk/business-and-trade/undertaking-works-on-our-property-and-our-code-of-practice>). Part 2 of the Code of Practice refers to service crossings.

The above comments are given without prejudice to any further matters which may be raised by the Trust at a later stage as more details emerge.

Please do not hesitate to contact me with any queries you may have.

Yours sincerely,

[REDACTED]
Area Planner

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Date: 09/02/2026

OUR REF: 26/0073/NSIP

YOUR REF: EN0710001

Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (The EIA Regulations) – Regulations 10 and 11 Application by Peak Cluster Limited (the applicant) for an Order granting Development Consent for the Peak Cluster CCS Pipeline (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 13/01/2026. 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 Volume 1 and Volume 2 (Appendices) dated January 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

- Common Toad

This priority amphibian species is known to be widely distributed across Cheshire. The impact of the proposed development upon this species, particularly permanent land take and the risk posed to amphibians from open trenches during the spring movement to and from ponds should be assessed and mitigated.

- Aquatic Invertebrates

Whilst the scoping report considered aquatic invertebrates this is only in the context of the rivers and streams. Cheshire ponds are known to support a number of uncommon and priority invertebrate species. Consequently, any ponds directly affected by the development should be surveyed and assessed for their potential to support important (protected, priority, red data, rare) aquatic invertebrates.

- Hedgerows

A Hedgerows Regulations assessment of any hedgerows significantly affected by the proposed works is required.

- Grassland Habitats

Detailed botanical surveys including an NVC survey supported by a full grassland species list with DAFOR data for each species recorded should be undertaken for any grassland affected by the proposed development which is categorised as either 'other neutral grassland' 'other lowland acid grassland', 'Lowland Dry Acid grassland' or 'Lowland meadow'.

Landscape and Visual

The LVIA methodology is generally considered acceptable however the initial landscape and visual baseline requires further surveys to ensure accurate characterisation. This additional survey work should be communicated early to Cheshire East for approval and where needed and possible further additional survey work may be required pending a more detailed route option. It is considered that there should also be an assessment of nighttime effects particularly with regards to any lighting proposed.

The LVIA should be undertaken as an iterative design process, as recommended by GLVIA3, with any major Landscape and Visual impacts of significant assets being avoided as part of the pipeline detailed layout process where possible. The assessment should detail evidence of the approach to an iterative design process and demonstrate how harm has been avoided. Should significant harm result, this should be discussed at an early stage with Cheshire East Council to allow identification of any avoidance options, especially within Local Landscape Designations, destruction all/part of, of sensitive ecological sites, ancient woodlands, heritage sites, archaeology, significant landscape geological features including for example valley slopes, cliffs and exposed rock faces, noticeable changes in topographical levels etc.

Any harm to the landscape should be supported by a comprehensive landscape reinstatement strategy and appropriate ecological management measures. Due to the early stage of design and the lack of detail particularly in relation to exact route, lighting effects and the precise siting of AGIs and BVIs, we would welcome further engagement with the project team to discuss the appropriate approach to assessment and mitigation. We reserve the right to add to table 7-7: Visual Receptors, including M6 users, railway users, if deemed necessary, as the route is refined.

As per elements within the EIA scoping report, we would recommend that all LVIA assessments, deductions and mitigation are organised into authority-by-authority sections for ease of review.

Appendix I Cumulative Effects Assessment Provisional Long List: Due to the current pace of proposals, we recommend that the list of proposed developments or consented schemes included in the assessment is reviewed periodically as the design is refined. The pipeline would potentially pass through a number of significant major residential sites and strategic allocations therefore the baseline may change significantly.

We reserve the right to require photomontage visuals of above ground elements from public rights of way, where needed (due to landscape sensitivity issues) at the next stage and their assessment to be included within the LVIA.

We consider that the assessment should be supported by a drone fly by, at an oblique angle (not Plan) footage of all proposed routes within Cheshire East and of a good digital quality, in order to assess the route, field by field for local impacts. This should include onscreen time code for reference. The final drone rendered footage should have the pipeline route corridor easily identified.

The assessment should detail measures to avoid the damage of existing landscape character including hard and soft elements which form the character area. A clear methodology is required for all soil excavation, storage and handling.

In addition the assessment should be supported by:

- plans and section drawings/ elevations and design details of any AGI/BVI,

- landscape layout plans, including species, planting specifications, and both hard and soft landscape proposals for AGI/BVI.
- Details of all above-ground compounds (permanent and temporary), and details of all temporary laid tracks, temporary farm gate access improvements
- A clear reinstatement timeline and methodology of temporary large staging/compound areas
- A Landscape Strategy and Design Rationale, including a full mitigation strategy temporary and permanent proposals.
- A long term monitoring, Management and Maintenance Plan.

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

Built Heritage

We note that the proposed pipeline route corridor is located very close to some of the designated Conservation Areas in Cheshire East. These Conservation Areas should be included in the mapping and should form part of the assessment. There should also be sufficient information to detail construction techniques and mitigation where the pipeline corridor would be in close proximity to, or pass under, vulnerable buildings or structures.

Please note that 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 built heritage. We would recommend that further detailed discussions are held with the Heritage Team in the near future to agree an appropriate approach to the assessment and identification of mitigation.

Archaeology

It is stated that the assessment will consider the effect of the development on Designated Heritage Assets within a 5km radius of the limits of any future Development Consent Order (DCO) for above-ground elements of the development and 1km for below-ground elements. Detail on the limits of the study areas is provided in Paragraphs 10.3.5-9 but this section would benefit from some re-phrasing as it is not clear what is being proposed, especially as this general commitment seems to differ from what is set out at Paragraph 10.7.16, with respect to below ground components. This seems to suggest a 1km limit at Paragraph 10.3.7 but only 500m at Paragraphs 10.7.17 and 10.8.3. This may

be a textual error but, for the record, a 1km search area from the draft order limits for the assessment area is recommended.

In general, the approach outlined in the Scoping Report is considered appropriate however, we would make a number of observations and comments as follows:

1. With respect to the other Nationally Significant Infrastructure projects in Cheshire (HyNet CO2 pipeline scheme, Frodsham Solar Farm) we have recommended that discrete geoarchaeological desk studies are prepared as part of the consideration of the effect of these developments on the historic environment. This approach has been strongly endorsed by Historic England and has been driven by the presence of extensive peat deposits on land affected by the projects and, where affected by development, their potential to provide information on the past environment through programmes of field assessment and analysis. Techniques employed have included pollen, macrofossil, charcoal, insect remains, and soil micromorphological analysis. Similar deposits are present within the Peak Cluster study area in Cheshire so we consider that it is appropriate that a similar study should be prepared for this project and included in the ES. At ES stage, this would be a desk-based exercise but it would establish the need and justification for further fieldwork and the specific areas of study. This is a specialist area and would require the involvement of a suitably-experienced body.
2. A linear scheme such as this will cut through numerous former township and ancient parish boundaries, often preserved today as modern civil parish boundaries. These are not generally specifically recorded in the Cheshire HER but can easily be identified on the Cheshire tithe Maps Online website: [Cheshire Tithe Maps Online](#) . In many cases, these will be some of the most ancient features in the landscape and, where affected by the scheme, should be identified in the assessment and a section recorded during field mitigation.
3. Table 10.5 in Volume 1 of the Scoping reports states that the proposed trial trenching will be targeted on areas of potential identified by other assessment work noted above. This is entirely appropriate but is likely to leave large areas where no archaeological areas of interest have been identified. Other NSIP projects such as HyNet Co2 have seen the trenching extended to cover a sample of these ‘blank’ areas, an approach that has identified archaeological deposits at a number of locations which is not unexpected, given the ephemeral nature of much of the rural archaeology in the region. Consideration should therefore be given to a similar approach on this project. There may also be a case for the use of innovative techniques (Geochemical analysis, etc) in apparently blank areas to try and identify areas of activity. In addition, it is noted that the HyNet CO2 pipeline NSIP saw a significant amount of trenching undertaken before formal granting of the DCO. It is recognised that that there can be difficulties in securing access for intrusive survey work before the DCO is granted but the approach has undoubtedly been beneficial in establishing the need for further mitigation at particular locations at an early stage in the project.

4. The North West Regional Research Framework has recently been updated and reference should be made to this in the PEIR and Environmental Statement studies, with particular reference to the research questions which the project has the potential to address. A link to the project's website appears below:

[Research Agenda - North West Regional Research Framework](#)

5. The project will affect parts of Cheshire East which lie within the Peak District National Park, whose archaeological advisors have responded to the national Scoping Report Consultation. Similarly, the National Trust's archaeological advisors will respond with regard to affected areas within Lyme park, a Grade II* Registered Park, the north-western part of which lies outside the National Park.

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

The proposed scope for assessing air quality impacts is generally considered acceptable at this stage however given that the proposal will be subject to significant design refinements, we would recommend that further discussions are held with the Environmental Protection officers of the Council as the scheme progresses and the design is refined in order to ensure that the air quality assessment is appropriate to the final design submitted.

Geology and Ground Condition

On the basis of the information provided, the proposed methodology contained within Chapter 13 (Geology and Ground Conditions) is generally considered acceptable. As part of planned surveys it is proposed to undertake the following in relation to land contamination:

- Site Walkover – focussing on higher risk areas within the Scoping Boundary
- Phase I Desk Study of the full extent of the Scoping Boundary
- Ground Investigation – where required to focus on specific areas within the Scoping Boundary

We are in general agreement with this methodology. The council would request that we are provided with these reports for our comments at appropriate stages as the design is refined. We would recommend an environmental search is undertaken with us to identify any information we may hold which may benefit the assessment.

Human Health

We note that a commitment is made to undertake a detailed baseline assessment of the existing human health receptors along the length of the route. We consider that a separate Health Impact Assessment should also be undertaken.

We consider that the following should be assessed in detail:

- Impacts on those in the vicinity of the construction of the pipeline that may experience adverse health effects. We would want to ensure those members of the community with protected characteristics as defined in the Equalities Act be specifically considered.
- Impacts on social connections is a concern with the pipeline cutting across a number of main roads. We would suggest that impacts on community infrastructure consider social isolation and loneliness, particularly for older and disabled people affected by this if it restricts their access to services, friends and family.
- Access to health infrastructure is another area requiring focus as the main roads to both Macclesfield Hospital and Leighton Hospital (A523, A536, A537 and A530) would all be impacted by the pipeline. This would affect patients and staff accessing the sites and also emergency ambulances so appropriate mitigation measures would need to be identified. Similarly, it may be that GP surgeries and other health facilities may have access affected and social care staff may struggle to access their clients and facilities. Any potential impacts need to be considered.
- An explicit consideration of mental health and wellbeing should also be included.
- There should be a commitment to consulting with the respective Directors of Public Health and their teams as part of the assessment.

We note that the Human Health section of the EIA Scoping Report proposes to scope out the potential changes to air quality, landscape and visual amenity, and traffic and transport impacts with respect to the operational stage of the development. We would note that the AGIs/BVI would be present throughout the operational stage and would likely present an impact on all these areas, particularly with respect to landscape and visual amenity. It is difficult at this stage to determine the extent of any impact as there is insufficient information on the scale and location of these proposed assets within Cheshire East therefore we consider they should remain within the scope of the assessment.

General Comments

EIA Scoping Report Volume 1 Para 2.6.2 – This should contain a complete list of documents that comprise the Development Plan covering the whole of the Peak Cluster boundary. For Cheshire East this comprises:

- The Cheshire East Local Plan Strategy, adopted 2017
- The Cheshire East Site Allocations and Development Policies Document, adopted 2022
- Made Neighbourhood Plans within the Peak Cluster development area boundary

Please note that Cheshire East retains the saved policies of the Cheshire Replacement Minerals Local Plan 1999 and saved policies in the Cheshire Replacement Waste Plan 2007 until replaced by the new local plan.

We note that several sections of the scoping boundary are within Areas of Search for sand and gravel and Preferred Areas for salt as shown in the Cheshire Replacement Minerals Local Plan 1999. These should be identified and considered as part of the assessment.

Socio-Economics (Chapter 14):

- Regarding the scope of the socioeconomic effects that would be assessed, it is proposed in paragraph 14.1.4 that the assessment will consider the effects on the labour market, local communities and land use (including businesses' premises and land and development land). However, the assessment should also consider potentially significant effects on the local economy more generally, including different industries (not just the tourism industry) and on major employment sites. It is notable that one of the potential pipeline routes overlaps with the southern, currently undeveloped, part of an allocated employment site in Middlewich – Site LPS 44.
- The assessment should also consider the impact on the local housing market. Table 14-13 states that the project's construction phase may potentially have a significant impact on residential properties and implies they will be affected by some disruption (changes to access is mentioned; construction work noise is another possible issue).

Reference documents (as listed in Section 14.2):

- The HCA Additionality Guide (published 2014 and still available via the gov.uk web pages) was "withdrawn" by central government in 2022 (see <https://www.gov.uk/government/publications/additionality-guide>). However, there is related, more up-to-date guidance available (covering some of the same concepts and effects – deadweight, displacement, substitution, leakage, multipliers, etc) in the MHCLG Appraisal Guide (published March 2025): <https://www.gov.uk/government/publications/the-mhclg-appraisal-guide/the-mhclg-appraisal-guide>
- There may also be relevant information in the Neighbourhood Plans covering those parishes through which the proposed pipeline may potentially pass.

Data sources (as summarised in Section 14.4):

- More up-to-date data is now available from some of the listed datasets. In particular:
 - The new (2025) English Indices of Deprivation were published in late October 2025 at <https://www.gov.uk/government/statistics/english-indices-of-deprivation-2025> . The Peak Cluster assessment ought to take

account of this evidence, seeing as it is far more recent than the previous (2019) Indices cited in 14.4.1.

- BRES (Business Register and Employment Survey) data for 2024 was released in late October 2025.
- Visit Britain's previous (2016) England Accommodation Stock Audit is due to be updated again in 2026, according to its website: <https://www.visitbritain.org/research-insights/england-accommodation-stock-audit>
- It is not clear what report or dataset is meant by 'VisitBritain (2019). England Domestic Tourism' (Ref 14-20), as the web link provided for that in the References section of Chapter 14 (<https://www.visitbritain.org/england-domestic-tourism>) is broken. However, related information on domestic tourism (up to 2024) can be found at <https://www.visitbritain.org/research-insights/england-domestic-tourism-regional-and-subregional-data>
- Also of relevance in assessing the economic impacts are:
 - the UK Business Counts data (published annually on the Office for National Statistics' (ONS) NOMIS website (<https://www.nomisweb.co.uk/>), with the data currently going up to 2025. This data breaks down counts of enterprises by industry, with these figures being available at (and below) local authority level.
 - the Annual Survey of Hours and Earnings (ASHE) data (also published on NOMIS and also going up to 2025 at present), which are available down to local authority level, although survey sampling error margins mean that the local authority level figures are much less precise than ASHE data for larger geographical areas or local authority level data (on other socioeconomic topics) from the 2021 Census.
 - 2021 Census data on employment by (broad) occupation.
 - VisitBritain/ VisitEngland's latest Annual Survey of Visits to (English) Visitor Attractions (the 2024 results published in June 2025), may be of relevance, particularly for any attractions that are close to (and potentially directly affected by) the proposed pipeline route: <https://www.visitbritain.org/annual-survey-visits-visitor-attractions-latest-results>
- Data on household income, which would reflect the standard of living of local residents in a way that GVA per head (skewed by the impact of commuting flows and differences between local authorities' age structures) cannot. Data on gross disposable household income (GDHI) per head is published annually by ONS (down to local authority level), with the latest data (up to 2023) available here: <https://www.ons.gov.uk/economy/regionalaccounts/grossdisposablehouseholdincome/bulletins/regionalgrossdisposablehouseholdincomegdhi/1997to2023>
- It would be useful, as part of a housing market assessment, to include data on house prices (median house prices) and housing affordability ratios (such as the ratio of median house price to the median earnings of people working in the geographical area in question). This data is published by ONS annually, down to local authority level, with the latest figures (up to 2024) available here: <https://www.ons.gov.uk/releases/housingaffordabilityinenglandandwales2024>

We note that the EIA Scoping Report proposes that impacts on development land, utilities and renewables infrastructure would be scoped out for the operational and decommissioning stages of the scheme. We consider that this should be included in the assessment. The pipeline route corridor has the potential to have severely adversely impact and sever a number of strategic allocations in our Local Plan and the inclusion of potential easements during the operational stage of the development could adversely affect the ability to bring forward these designations.

Climate Change

The Environmental Impact Assessment Scoping Report Volume 1 should include references to all local policies within the Climate Change section. There should be appropriate consideration given to the Cheshire East Carbon Action Plan 2045 and the climate change mitigation under this section.

Table 17-18: Climate Change Assessment Scope indicates that GHG Impact Assessment would be scoped into the EIA however Peat is not specifically highlighted. Whilst it is noted that Peat may only be located within limited sections of the route, the disturbance to Peat through excavation, drainage, or compaction has potential to release of stored carbon as greenhouse gases and the EIA should consider the impacts of this disturbance on greenhouse gas emissions and climate objectives.

Traffic and Movement

Public Right of Way and Green Infrastructure

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.

The EIA should refer to Public Rights of Way using the nomenclature depicted on the Definitive Map and Statement (e.g. Prestbury Footpath No. 1).

The EIA should include an assessment of the impact of the proposed development on users of the Public Right of Way, both during construction and post-construction.

A condition survey of the affected PROW and CRS site should be provided, to take account of the surface, widths and furniture on the route. It should be stated that the reinstatement of the affected PROW and CRS shall be to at least the same standard as pre-construction, with the option to improve on that specification where beneficial to the public and in agreement with the landowner and other interested parties.

The EIA should identify the Middlewood Way by name in order that its importance for both leisure and active travel is considered within the assessment. The assessment should

include options for diverting users around the construction site to maintain the continuity of the route for all users.

There should be a survey of usage of the Middlewood Way affected by the proposed development in order to inform the assessment of impact. This should include the following:

- 12 hour count of users,
- 1 term-time week day, 1 term-time weekend day
- 1 school holiday week day, 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: in manual wheelchair/in electric wheelchair

The assessment should recognise that public access to the identified PROW and CRS site along with access to those not directly affected by the scoping boundary, may be affected by construction traffic, and any effects should be assessed.

The EIA should take account of the fact that users of PROW and CRS sites may also be *audio* receptors of the proposed development. 7.2.1, Table 7.1 of the EIA Scoping Report states that “The Countryside and Rights of Way (CROW) Act 2000 (Ref 7-6) sets out the legal basis for the definition of PROW, users of which may be visual receptors of the Proposed Development.” It should be noted that the legal basis for the definition of Public Rights of Way pre-dates the 2000 Act and is used in other key legislation.

The EIA should identify that both the NPPF and the Cheshire East Local Plan recognise PROW as a valued part of the traffic and movement networks in addition to forming leisure routes (8.2.1 Table 8-2).

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



Principal Planning Officer
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Your Ref: EN0710001

Date: 9 February 2026

Dear [REDACTED]

Consultation response on EIA Scoping Report- relating to application by by Peak Cluster Limited (the applicant) for an Order granting Development Consent for the Peak Cluster CCS Pipeline (the proposed development)

Introduction

I write in response to the statutory consultation correspondence dated 13th January 2026 carried out in relation to the Environmental Impact Assessment Scoping Report (SR) concerning the above development proposal.

The Applicant commissioned an Environmental Impact Assessment (EIA) Scoping Report, dated January 2026, in accordance with Regulations 10 and 11 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017

The Council is identified as a 'consultation body' as defined in the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 (as amended) and has therefore been consulted prior to PINS adopting its Scoping Opinion. The deadline for consultation responses is 10th February 2025.

The Council has reviewed the EIA Scoping Report and seeks to highlight the areas below for further dialogue with the Applicant to shape the scope of the EIA and ensure comprehensive identification and assessment of the proposal's impacts. These comments are made on a without prejudice basis and having regard only to the material provided. The Council reserves 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.

Design and Landscape/Visual Impact

1. The pipeline is indicated to be installed using an open-cut trench installation, with a working width, ranging from 30 to 40m. The proposed pipeline is anticipated to pass through a number of Landscape Character Areas as per the CWaC Landscape Strategy 2016. This also includes for Areas of Special County Value (ASCV). Within the applicants Scoping report, Table 7-21 Landscape and Visual Scope- Peak Cluster Pipeline (Central) the Long term effects on landscape character at Construction, Operation and Decommissioning stages has been scoped out. The LPA accepts that the applicant has indicated that consideration would be given to trees, woodland and hedgerows wherever practicable. Nonetheless, the LPA consider that the impact of the open cut trench method on vegetation and in particular mature woodland if not avoided would be significant and whilst we would welcome an approach to micro siting the pipeline away from these features where possible in the first instance and encourage all measures possible to avoid the loss of mature specimen trees, the LPA perceive that on the basis of information available, given the scale of the proposal and potential for loss of trees and woodlands and the associated long term effects this could have the long term effects on landscape character particularly if an easement is required preventing replacement planting and therefore the long terms effects of construction and operation should be scoped in.
2. Furthermore, the LPA have limited information regarding the scale and siting of the Connection AGI 2 and AGI 3 aside from paragraph 3.2.99 which set out that these will be between 5000m² and 15,000m². The AGI's search areas are relatively large and include areas within very close proximity to a number of residential dwellings. On the basis of the information available the LPA suggests that 'Long term effects to people's views and visual amenity as a result of the existence and operation of the Proposed Development' should be scoped in given the AGI would be permanent installations. The LPA also suggests that the long term effects associated with lighting should be scoped in and details submitted showing the location and design of construction and operational lighting and provide an assessment. The design standards that any additional lighting will be required to meet should also be described in the ES, including any measures incorporated to avoid intrusive lighting impacts for human or ecological receptor.
3. Please ensure that consideration is given to the guidance recommendations as per each Landscape Character Area. In regard to Table 7-23: Landscape and Visual Scoping - Peak Cluster Pipeline (West) and Coastal AGI the Landscape and Visual Scoping, given the lack of information at this stage, we would seek further discussion with the development team surrounding the content of the LVIA.

Flexibility

1. The LPA note the applicants desire to incorporate flexibility into their draft DCO using the 'Rochdale Envelope' approach for this purpose. The LPA also note that the applicant has confirmed that where the details of the Proposed Development cannot be defined precisely, the Applicant will apply a worst-case scenario. Notwithstanding the applicants attention to The Planning Inspectorate's Advice Note 9, the LPA consider that the ES should be as narrow as possible and limit the range of options with it clearly established where the location has not been fully finalised. It would not be reasonable for the applicant to submit essentially multiple different options which are materially different or introduce an unacceptable degree of uncertainty, the description of the ES must be specific and meet Regulation 14 of the EIA Regulations. The uncertainty around an unspecific/ unfixed boundary would in particular introduce significant effects to a number of other scoped in effects including housing land supply allocated within the local plan 'Table 14-18: Development land, utilities and renewable infrastructure', Biodiversity, Highway Safety and residential amenity.

Greenhouse Gas and Climate change

1. It is noted that Table 17-18: Climate Change Assessment Scope indicates that GHG Impact Assessment would be scoped into the EIA. However, Peat does not appear to be specifically mentioned. Separately Table 13-8: Geology and Ground Conditions Baseline Information- Peak Custer Pipeline (Central) identifies within Ground Gas that there is a 'Potential for ground gas relating to the on/offsite infilled land, historical landfills, potential Made Ground and the Peat present in isolated areas across the Pipeline'. In this case, whilst Peat presence within the study area is limited and may be spatially confined, the LPA would suggest that any disturbance to Peat through excavation, drainage, or compaction has potential to release of stored carbon as greenhouse gases. It is therefore essential that the EIA fully considers the implications of peat disturbance for greenhouse gas emissions and climate objectives within the climate change scope.

Archaeology and Historic Environment

1. A DCO pipeline with the overall length proposed within this application will cut through numerous former township and ancient parish boundaries, often preserved today as modern civil parish boundaries. These are not generally specifically recorded in the Cheshire HER but can easily be identified on the Cheshire tithe Maps Online website: Cheshire Tithe Maps Online . In many cases, these will be some of the most ancient features in the landscape and, where affected by the scheme, should be identified in the assessment and a section recorded during field mitigation. Table 10.5 in Volume 1 of the Scoping reports states that the proposed trial trenching

will be targeted on areas of potential identified by other assessment work noted above. This is entirely appropriate but is likely to leave large areas where no archaeological areas of interest have been identified. Projects such as HyNet Co2 have seen the trenching extended to cover a sample of these 'blank' areas, an approach that has identified archaeological deposits at a number of locations. This is not a surprise, given the ephemeral nature of much of the rural archaeology in the region and consideration needs to be given to a similar approach on this project. There may also be a case for the use of innovative techniques (Geochemical analysis, etc) in apparently blank areas to try and identify areas of activity.

2. In addition, it may be noted that HyNet CO2 saw a significant amount of trenching undertaken before formal granting of the DCO. It is recognised that there are real difficulties to securing access for intrusive survey work before the DCO is granted but the approach has undoubtedly been beneficial in establishing the need for further mitigation at particular locations at an early stage in the project.
3. The North West Regional Research Framework has recently been updated and reference should be made to this in the PEIR and Environmental Statement studies, with particular reference to the research questions which the project has the potential to address. A link to the project's website appears below:

[Research Agenda - North West Regional Research Framework](#)

4. Figure 10.2F: Designated Heritage Assets in Volume 2 of the Scoping Report omits the Registered Battlefield at Rowton Heath, a 17th-century Civil War engagement. This is outside the red-line Scoping Report Boundary but is within the study area limits for Designated Heritage Assets and the effect of the scheme on the site should be considered in the PEIR and ES. In terms of Scheduled Monuments, none appear to lie within the red-line Scoping Report boundary but two Scheduled cropmarks (SM1014380 and SM1014379), shown on Figure 10.2F and interpreted as Roman practice camps, lie right on the red-line boundary. Careful consideration of the effects of the development at this location will be required. Finally, it is noted that the Scheduled medieval castle and prehistoric hillfort at Beeston (SM1007900) does not appear to be depicted on Figure 10.2.E. As this is an upstanding Designated site, the effect of the development on the monument should be assessed in the forthcoming studies.
5. Other National Infrastructure projects in Cheshire (HyNet CO2, Frodsham Solar Farm) have attracted recommendations from APAS for the preparation of discrete geoarchaeological desk studies as part of the consideration of the effect of these developments on the historic environment. This approach has been strongly endorsed by Historic England and has been driven by the presence of extensive peat deposits in land affected by these schemes and, where affected by development, their potential to provide information on the past environment through programmes of field assessment and analysis. Techniques employed have included pollen, macrofossil, charcoal, insect remains, and soil micromorphological analysis. Similar

deposits are present in the Peak Cluster study area in Cheshire so it is appropriate that a similar study should be prepared for the project and included in the ES. At ES stage, this would be a desk-based exercise but it would establish the need and justification for further fieldwork and the specific areas of study. This is a specialist area and would require the involvement of a suitably-experienced body.

6. Attention would also be drawn to the fact that undesignated and non designated heritage assets have not been scoped into the ES. The LPA consider that potential significant effects could occur in regards to these assets and these should be scoped in particularly considering the proximity to any AGI's or the landscape character of these assets during construction.

Major Accidents and Disasters Scope Technological or manmade hazards

1. The details scoped into table 18-14 are noted and the LPA is in agreement that these should form part of the ES. The LPA does seek to raise that the proposed pipeline would be in close proximity to the Hoole Bank Tar Lagoon, which includes material deposited at the site which was a byproduct of historical oil refining processes and was known as acid tar waste. The waste was disposed of by a company called Lobitos Oilfields Ltd, the former name of LUKL, and came from the company's Ellesmere Port refinery. At the time the disposal activity took place, it was an accepted and legal industry practice. Waste disposal activities were undertaken under an agreement with the then owners. Now the site has no apparent legal owner. The site is 'special site' by the Environmental Agency due to the severity of its contamination. The LPA note that within Manmade Hazards-Pollution Accidents, land and water pollution accidents has been scoped page 526 for construction and operation. The LPA advise that given the proximity to the Hoole Bank Tar Lagoon and extent of any construction phases, as well as operation phases, any pollution accident should be scoped in as the impacts relating to Hoole Bank Tar Lagoon would be significant.

CONCLUSION

In summary, this is a highly complex consultation due to the sheer volume of material presented for stakeholders to review and provide meaningful comment. The Council are strongly of the view that the ES must be comprehensive and thorough, without this the project cannot be considered acceptable in principle.

The statutory consultee response is provided without prejudice to any actions the Council may take as landowner should the need arise.

Yours faithfully


Senior Planning Officer



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: [REDACTED] – Senior Environmental Advisor

The Planning Inspectorate

By Email - PeakClusterCCS@planninginspectorate.gov.uk

5th February 2026

Our Ref: ENSIP-36

Dear [REDACTED]

Re: EN0710001 Scoping consultation - Peak Cluster CCS Pipeline - project will capture CO2 emissions at source and transport them via a new pipeline for safe, permanent storage beneath the East Irish seabed - Cement and Lime Facilities in Derbyshire and Staffordshire and a connection to Carbon Dioxide Store in the East Irish Sea

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

The Coal 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.

Our records indicate that some areas of the route that fall within those parts of the coalfield where coal mining features are present at surface or shallow depth.

The Coal Authority is of the opinion that building over the top of, or in close proximity to, mine entries should be avoided wherever possible, even after they have been capped, in line with our adopted policy:

<https://www.gov.uk/government/publications/building-on-or-within-the-influencing-distance-of-mine-entries>

The EIA Scoping Report, dated January 2026, covers ground conditions in Chapter 13. The report notes that for the purposes of EIA scoping the development has been grouped into the following:

- Breedon Capture Facility;
- Tarmac Capture Facility;
- Buxton Lime Capture Facility;
- Holcim Capture Facility;
- Peak Cluster Pipeline, split East (Between Central AGI Feeder and Connection AGI 2, near Ellesmere Port); and West (from Connection AGI 2 to the Coastal AGI); and
- Coastal AGI to MLWS Pipeline(s), including the Coastal AGI.

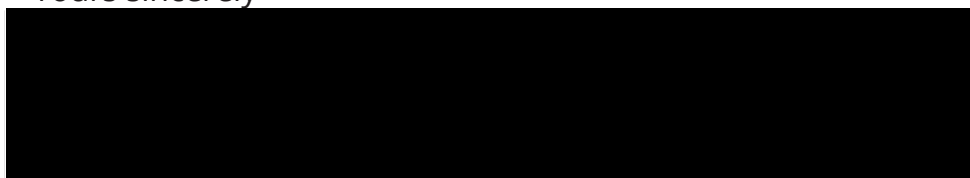
The report notes that the Breedon Capture Facility, Tarmac and Buxton Capture Facility, Holcim Capture Facility, Peak Cluster Pipeline (Central Section) and Peak Cluster Pipeline (West Section) are outside of the coal mining reporting area, on this basis no coal mining features will be recorded in these areas. The report authors comment that the Peak Cluster Pipeline (East Section) is within an area where coal mining features are recorded at surface and shallow depth and for the Coastal AGI and MLWS Pipeline Moreton Beach is within the coal reporting area but no recorded features are noted.

The report authors note that both desk based and intrusive ground investigations will be undertaken. We assume that this will include risks posed by coal mining features if they are present in the area. We also note that the Scoping Report states that consultation will be undertaken with relevant statutory bodies including the Coal Authority (trading as the Mining Remediation Authority).

We are pleased to see that consideration of ground conditions, including risks posed by recorded coal mining features to certain parts of the project, are noted as being scoped into the ES.

If you would like to discuss this matter further, please contact me on the above number.

Yours sincerely



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 and/or information that has been published. 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 for consultation purposes.

From: [REDACTED]
To: [Peak Cluster CCS Pipeline](#)
Cc: [REDACTED]
Subject: Congleton Town Council - Peak Cluster CCS Pipeline - EIA Scoping Consultation
Date: 09 February 2026 16:04:49
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)

You don't often get email from [REDACTED]@congleton-tc.gov.uk. [Learn why this is important](#)

Good Afternoon

In response to your letter dated 13.01.26, Congleton Town Council submits the following comment:

Under section 4.2.13, page 47, an additional level of 'hyper local' consultation should be inserted that allows for on-site or in-community discussion at those most sensitive and heavily impacted areas, such as Timbersbrook.

Kind regards

[REDACTED]
Communities Manager

T: [REDACTED]
M: [REDACTED]
W: www.congletonpartnership.co.uk
W: www.congleton-tc.gov.uk/



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From: [REDACTED]
To: [Peak Cluster CCS Pipeline](#)
Subject: EN0710001 Application by Peak Cluster Limited (the applicant) for an Order granting Development Consent for the Peak Cluster CCS Pipeline
Date: 03 February 2026 16:43:46

You don't often get email from clerk@cranageparishcouncil.gov.uk. [Learn why this is important](#)

Dear Planning Inspectorate

Cranage Parish Council writes in response to your request for information which should be provided in the Environmental Statement for the above proposed development.

Cranage Parish Council considered this communication at the Parish Council meeting on 20th January 2026, where it was RESOLVED to submit the following comment:

- **Planning Inspectorate Ref: EN0710001.** Application by Peak Cluster Limited (the applicant) for an Order granting Development Consent for the Peak Cluster CCS Pipeline (the proposed development)

Comment:

Cranage Parish Council would request that the Environmental Statement should be as wide as possible to cover all aspects of environmental harm, and that the pipeline is developed in accordance with the policies in the Cranage Neighbourhood Plan (currently at Reg 15 stage)

The Parish Council requests that any other technologies that convert or neutralise carbon emissions are fully explored prior to construction of this major CO2 relocation scheme.

With Kind Regards

[REDACTED]

Clerk to Cranage Parish Council

Tel: [REDACTED]

Email: clerk@cranageparishcouncil.gov.uk

This e-mail and its contents are confidential. If you receive it in error please delete as soon as possible and do not copy transmit or print in any form. Cranage Parish Council operates anti virus software on its computer system but does not accept responsibility for any virus which may have affected this e-mail or any attachment(s); it is the responsibility of the recipient to check

Peak District Development Response to Peak Cluster Proposal (DHWPC note 2)

Response to the Environmental Impact Assessment (EIA) EN07 10001

We (I) object both in principle and detail to this Development which is within a National Park, whose environment is rare, nature diverse and precious. If this Development is approved there would be reputational damage to the National Parks, as 75 years are celebrated since their foundation. We have witnessed visitor numbers double since the Pandemic to the extent that the Peak District National Park is reputed to be the second most visited park internationally. The facilities are already under strain and need to be enlarged.

We have three major objections to the Development:

Nature Loss

We do not believe the mitigation or restoration described in the EIA will be sufficient to overcome the permanent nature and biodiversity loss caused by the excavation of the 195km long, 300m wide trench for the main high pressure pipeline and the connecting pipes to the quarries. The EIA also refers to permanent pressure relief and stop valve houses, storage of heavy plant, materials and fuels as well as temporary site offices.

Efficiency and emissions from carbon capture

There are differences of opinion concerning the models used to calculate the whole life global warming gas emissions (covered in PAS 2080) and the whole life economics of carbon capture plants. This Development proposal is not transparent or independent concerning the data and calculations used to justify the processes of chemical scrubbing, pressurization and deep sea storage. Neither are emissions of other priority pollutants, for example hydro and fluorocarbons, micro and nano particulates predicted. We suggest carbon capture, transport methods and storage, utilisation and conversion of carbon dioxide are still under development and as yet inappropriate for this type of inland mining.

Economic environmental impact

This Development proposal for a multibillion pound construction project lasting several years threatens the future growth of the major economic activity of the area, which is from its visitors. There are no local benefits to this scheme and it will reduce the attractiveness to both urban and commercial investment. It will also undermine efforts to reduce the UK's reliance on new concrete (affected by other mineral resources) and promote circular sustainability and alternative materials.

FAO: [REDACTED]
Planning Inspectorate

Our ref: XA/2026/100520/01
Your ref: EN0710001

PeakClusterCCS@planninginspectorate.gov.uk

Date: 10 February 2026

Dear [REDACTED],

Pre-application – Peak Cluster CCS Pipeline – EIA Scoping Opinion

Thank you for your consultation on the Scoping Report, submitted under the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017, in support of the Application by Peak Cluster Limited (the Applicant) for an Order granting Development Consent for Peak Cluster CCS Pipeline. This consultation was received on 13 January 2026.

We have reviewed the report, referenced 'Peak Cluster Environmental Impact Assessment – Scoping Report Volume 1 and Volume 2, Document Reference: DOC-W05-014-Final, prepared by ARUP and AECOM, dated January 2026' and can provide the following advice in relation to matters within our remit.

We do not agree with the scope of the Environmental Impact Assessment (EIA) and would recommend further issues are scoped in to meet the requirements of the EIA regulations.

Further detailed comments are provided within the following appendices:

- Appendix A – Comments on the scope of the EIA
- Appendix B – General advice on the proposals and EIA content
- Appendix C – Additional advice for the Applicant

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.

We trust this advice is useful.

Yours sincerely,



Planning Advisor – National Infrastructure Team

e-mail: Nlteam@environment-agency.gov.uk

Appendix A – Comments on the scope of the EIA

Flood Risk

Document Reference(s): Chapter 11, Tables 11-15 and 11-16	
Issue	The impact that the proposed development may have on flood defences has not been referenced or scoped in.
Impact	If appropriate mitigation is not implemented the stability and structure of flood defences may be adversely impacted.
Solution	Assessment of the impacts the proposed development may have on flood defences should be scoped in. This should assess both the above ground and below ground elements of defences. Additionally, construction method should implement sufficient mitigation to ensure there is no disruption to flood defences which may cause a breach event to occur.

Document Reference(s): Chapter 11, Table 11-15	
Issue	Assessment of flood risk to and from the proposed development at the capture facilities during operation has been scoped out.
Impact	New development and extensions of current developments may be at risk of flooding, and if not assessed, appropriate mitigation may not be implemented.
Solution	Undertake an assessment of flood risk posed to the development during the operational phase and ensure sufficient mitigation and resilience methods are implemented.

Document Reference(s): Chapter 11, Table 11-16	
Issue	Tidal flood risk has been scoped out for the operational phase for the Coastal Above Ground Installation (AGI).
Impact	Flood risk impacts to and because of the proposed development during operation could be underestimated.
Solution	Tidal flood risk for the operational phase for the Coastal AGI should be scoped in.
Additional narrative/ explanation	

Table 11-16 p.319 suggests tidal flood risk is scoped out of the operational phase. This seems premature as the coastal AGIs are situated within the tidal floodplain and could be at risk from tidal flooding, particularly when Upper and Credible Maximum climate change allowances are applied. There may be flood risk impacts to the Coastal AGI and because of the Coastal AGI which need to be considered. On this basis tidal flood risk should be scoped in for the operational phase, particularly in the context of the Coastal AGI.

Document Reference(s): Chapter 11	
Issue	There is no reference to an assessment of flood zone 3b and if proposals are proposed within this extent.
Impact	Vulnerable infrastructure could be placed within the functional floodplain causing increased risk both onsite and offsite.
Solution	Undertake an assessment of the extent of flood zone 3b and place proposed development outside of the functional floodplain. If this is not possible, the Applicant should propose adequate mitigation measures and compensate for any loss of floodplain to ensure there is no net loss.

Water Resources

Document Reference(s): Chapter 3 and Chapter 11	
Issue	Additional water is described as required at each Lime and Cement processing site. Whilst condensate and existing licences are inferred to be an available source of supply, not enough detail is yet known to scope out the risks and impacts (to the viability of the scheme) associated with the operational water demand.
Impact	The Derbyshire Derwent and Dove catchments have extremely limited water availability. Applications for new licences or increases to existing abstraction licences are likely to be refused or issued with extremely restrictive conditions. The Applicant should consider in detail what the water demands of the project are to ensure and plan for a secure and sustainable supply of water.
Solution	Operational water demand should be scoped in. A water supply strategy should accompany (or be incorporated into) the Environmental Statement which evaluates additional water demands by the scheme and options for sources of supply.

Additional narrative/ explanation The Environment Agency seeks confidence that a practical and sustainable water supply can be found to meet additional demands posed by the carbon capture process as described at the sites located in the Derbyshire Derwent and Dove catchments. A water supply strategy should consider the following: • Broad estimates of volumes of water required for carbon capture (cooling) associated with the scheme, this can be estimated if not know exactly at this early stage; • An appraisal of currently held licences available to the scheme at each site and recent use to indicate headroom which may available to the scheme; • A review of water availability as set out in the catchment abstraction licensing strategies which would apply to the development at different locations.	

Groundwater and Land Contamination

Document Reference(s): Chapter 11, Section 11.5.1 and Tables 11-15 and 11-16; Chapter 13, Section 13.6.2 and Tables 13-15 and 13-16	
Issue	There is no mention of heat as a pollutant during operation.
Impact	Carbon capture storage (CCS) pipelines can operate at higher than ambient temperatures. This can impact land, groundwater and surface water.
Solution	Thermal impacts from operation of the pipeline should be specifically mentioned and scoped in.
Additional narrative/ explanation Heat as a groundwater pollutant was introduced in 2023 via the Environmental Permitting (England and Wales) (Amendment) (England) Regulations 2023 SI No.2023/651. As such, discharges that might lead to an input of heat into groundwater are groundwater activities. We aim to be proportionate and pragmatic in our application of the principles of the Environmental Permitting Regulations and requiring a permit would feel disproportionate for many activities at or near the ground surface. At this stage we require the potential thermal implications of buried pipelines, in relation to risks to groundwater, to be considered via desk-based assessment. In those rare instances where we are concerned that there are risks which require	

ongoing control or management, we may opt to regulate it as a groundwater activity under schedule 22 of the Environmental Permitting Regulations (EPR) 2016.

The Environment Agency currently has no specific guidance relating to the potential thermal implications of buried infrastructure including pipelines. We suggest that our guidance for ground source heating and cooling systems should be used as a guide. The following link contains relevant information, including thermal plume modelling and an interactive system map and spreadsheet: [Environmental impacts of temperature changes from ground source heating and cooling systems - GOV.UK](#).

Document Reference(s): Chapter 18, Table 18-13

Issue	Pollution accidents are not scoped in for land and water during construction and decommissioning.
Impact	Pollution accidents during construction and decommissioning could impact land and water.
Solution	Pollution accidents should be scoped in for land and water during construction and decommissioning.

Document & chapter: Chapter 18, Table 18-14

Issue	Fire (manmade hazard) at an AGI during operation cannot be ruled out at this stage. Fire (manmade) during construction and decommissioning at any part of the route cannot be ruled out at this stage.
Impact	Potential insufficient mitigation to prevent and manage risks from major fire event.
Solution	Fire (manmade hazard) at an AGI during operation and fire (manmade) during construction and decommissioning at any part of the route should be scoped in or further explanation should be provided to justify scoping out.

Water Quality

Document Reference(s): Chapter 11, Section 11.5 and Tables 11-15 and 11-16

Issue	There are several topics that could negatively impact water quality which are not mentioned in the identification of potential effects. For example, risk from foul water in all phases, risk from increased sediment due to construction activities, and risk from thermal impacts

	from discharges associated with new on-site power generation during operation. Whilst chemical pollution is mentioned, this is broad and it is unclear where the specific risk is from. For example, fuel or oil leaks/ spills, chemicals used in the cement/ lime process or power generation maintenance, or bentonite breakout associated with Horizontal Directional Drilling (HDD). In both Tables 11-15 and 11-16, potential water quality impacts on surface water receptors seems to be repeated. However, it is unclear what impacts are scoped in.
Impact	If the effects are not appropriately identified, then there is a risk that they are not assessed which could result in a deterioration of water quality. If causes of impacts to water quality are not sufficiently identified in the scope, it is more difficult to provide suitable mitigation measures.
Solution	Include the topics above to the potential effects in section 11.5 to ensure that the key aspects that may affect the water environment are fully presented. If the Applicant believes they can justify why these are not included, they should explain. As such, it is recommended that Table 11-15 and 11-16 are also updated to ensure it is clear what impacts on water quality are scoped in. If the two rows of potential impacts should be labelled up as “direct and indirect adverse impacts” then this should also be clarified.

Document Reference(s): Chapter 11, Table 11-15 and Table 11-16; Chapter 18, Table 18-13 and Table 18-14	
Issue	In Table 11-16, foul drainage has been scoped out during operation and decommissioning on the basis that there should be no requirement for foul drainage. However, it is assumed that there will be people onsite for operational maintenance and during deconstruction, as part of decommissioning. Therefore, as it is unclear how foul drainage will be managed, it should not be scoped out. Given that the Applicant previously identified in Table 11-15 and 11-16 that how foul drainage will be managed is unknown, it is unclear how it is stated in Tables 18-13 and 18-14 that there will be “no use of the sewage system associated with the Proposed Development”. The sewage system is scoped out for all phases, but it is unclear why.

Impact	If foul water is not scoped in, there could be a risk to water quality if foul water can get into the receiving water environment. This can be particularly negative in areas which are identified as Nitrate Vulnerable Zones.
Solution	Foul drainage should be scoped in for all phases in Table 11-16. The Applicant should also explain why they are scoping out the sewage system in Tables 18-13 and 18-14. If foul waste will be managed via sealed cesspits or port-a-loos, rather than disposal by sewer connection, this should be clarified.
Additional narrative/ explanation: We note that in Table 11-15, foul drainage is scoped in for all phases which we agree with. The explanation is that it is not known how “foul drainage will be managed during all phases and so on a precautionary basis these topics have been scoped in”. Based on the same logic, we believe the Applicant should scope it in for all aspects of the project, not just the Capture Facilities.	

Document Reference(s): Chapter 12, Sections 12.2.19, 12.4.10, 12.4.11 and 2.4.14	
Issue	Section 12.2.19 suggests that there could be changes in water and sediment quality during piling, capital dredging and dredge disposal, as part of the construction and operational process. We agree with these impacts, but it is unclear if these are scoped in. Sections 12.4.10 and 12.4.14 suggest that there could be increased suspended sediment concentrations, and potential sedimentation, during construction and operation. We also agree with these impacts, but it is unclear if these are scoped in.
Impact	Sediment from construction and maintenance dredging can negatively impact marine water quality, as well as marine ecology. If the identified impacts are not scoped in this could result in a deterioration of water quality.
Solution	The sediment effects identified in the sections above should be scoped in for the Marine Environment. We recommend that the Marine Environment chapter is updated with a table/s to ensure consistency with other chapters and for ease regarding what impacts have been scoped in.
Additional narrative/ explanation:	

It is acknowledged that section 12.4.11 suggests that there is insufficient evidence to exclude any potential construction pathways from further assessment within the EIA, however this is not clear if this means it is scoped in. There is also no subsequent reference to operational pathways.

There were multiple same headings which made it harder to assess. For example, “Potential Construction Impacts” was listed under each heading. It may make it easier to read if the headings were more specifically named i.e. “Potential Marine Ecology Construction Impacts” vs “Potential Physical Processes Construction Impacts”.

Document Reference(s): Chapter 12, Section 12.2.19

Issue	It is suggested that there could be an impact to marine ecology from changes in marine water quality due to accidental spills from vessels and surface run-off from land-based construction activities. However, there is no mention of spills during operation, despite there likely being dredging vessels used for maintenance. It is unclear if these are scoped in. No mitigation measures have yet been provided for review and are unsecured, therefore there is a risk that they will be insufficient.
Impact	Marine works, vessel operations and dredging could increase the risk of fuel, oil or chemicals, which if they enter the marine water environment could reduce the water quality.
Solution	Changes to marine water quality should be scoped in for both construction and operation, at least until a Construction Environmental Management Plan (CEMP) and a marine pollution prevention plan can be reviewed.

Document Reference(s): Chapter 18, Table 18-13 and Table 18-14

Issue	Table 18-13 identifies that there “may be a risk of leaks and spillages of hazardous materials associated with the Capture Facilities”, however land and water has only been scoped in as at risk of a pollution accident during the operation phase. As HDD will occur in construction, and fuel and oil will be onsite during construction activities and decommissioning, it should be scoped in for all phases. In Table 18-14 land and water has been scoped out for all phases for pollution accidents, which we disagree with given that it says “during the construction phase there may be an increase in the risk of leaks

	and spillages of hazardous materials associated with the construction activities” and that “during construction of the pipeline there is a risk of contaminating watercourse”.
Impact	During construction there are many activities which could result in fuels, oils or chemicals spilling. Although these activities are less frequent during operation and decommissioning, any maintenance on site means that there is still a risk of accidental spills. If leaks and spillages occur on land, there is a risk to water quality due to contaminants getting into surface runoff.
Solution	Leaks and spillages impacting land and water should be scoped in for all phases in Table 18-13. Pollution accidents for land and water should be scoped in for construction in Table 18-14. Although it suggests the risks could be “controlled through standard control measures”, we have not yet been able to review a draft CEMP, therefore no mitigation measures are agreed or secured. Subsequently, the pollution accident risk must be scoped in, until there is confidence in the mitigation measures being sufficient.
Additional narrative/ explanation: It is likely measures will also need to be included in an Operational Environmental Management Plan (OEMP), Decommissioning Environmental Management Plan (DEMP), and Sustainable Drainage Systems (SuDS) used for treatment explained in a Drainage Strategy.	

Fisheries

Document Reference(s): Chapter 6, Section 6.2	
Issue	The Salmon and Freshwater Fisheries Act 1975 and The Eels (England and Wales) Regulations 2009 have not been included in the list of legislation that is relevant to biodiversity. The legal responsibility on the Applicant pertaining to this fish specific legislation has not been considered.
Impact	By omitting relevant legislation, the Applicant does not demonstrate that they have fully considered the impacts on fish from the construction, operation and decommissioning of the scheme.
Solution	The Salmon and Freshwater Fisheries Act 1975 and The Eels (England and Wales) Regulations 2009 should be acknowledged in the

	list of legislation in Chapter 6, with consideration given to its relevance for specific topics within the assessment scope.

Document Reference(s): Chapter 6, Table 6-4, Table 6-7 and Table 6-8	
Issue	References to the Peak District Dales Special Area of Conservation (SAC) in the tables listed above do not include white-clawed crayfish (Annex II) as a primary reason for selection or brook lamprey and bullhead (both Annex II) as species present as qualifying features.
Impact	Omitting to refer to these protected species could mean they are not included in the baseline or considered in the EIA.
Solution	Include white-clawed crayfish, brook lamprey and bullhead in the EIA for watercourses crossed by the scheme in the Peak District Dales SAC.

Document Reference(s): Chapter 6, Section 6.5.7	
Issue	Fish surveys have not been proposed where up to date survey data is not available.
Impact	Without a clear understanding of the baseline, the significance of impact-pathways cannot be properly assessed.
Solution	Complete additional fish surveys at proposed crossings of main watercourses where there are impact-pathways that could impact fish and up to date fish survey data is not available in order to understand the baseline and identify potential fish receptors from impacts.

Document Reference(s): Chapter 12, Section 12.2.5	
Issue	Omission to include sea lamprey and river lamprey (both Annex II) as qualifying features of the Dee Estuary SAC.
Impact	Omitting to refer to these protected species may mean they are not included in the baseline or considered in the EIA.
Solution	Include sea lamprey and river lamprey as part of the baseline for the Dee Estuary SAC.
Additional narrative/ explanation	
There is functionally linked land for the Dee Estuary SAC within the Environment Agency's jurisdiction.	

Biodiversity

Document Reference(s): Chapter 6, Sections 6.2.2 to 6.2.4	
Issue	Reference is not made to The Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2024.
Impact	Risk of not considering new environmental definitions in legislation in respect of Biodiversity Net Gain (BNG), such as 'irreplaceable habitat', along with related offences to said habitats.
Solution	Include reference to The Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2024 for completeness.

Document Reference(s): Chapter 6, Section 6.5	
Issue	Omission to include key notable species from the initial study of the biodiversity baseline environment. For example, within Table 6-8: 'Notable species identified within the Aquatic Desk Study Area', otter, water vole and white clawed crayfish are not listed; however, records of these species are identified on National Biodiversity Network (NBN) Atlas (an open data website for biodiversity records) as being within 2km of the scoping boundary.
Impact	Potential for species presence to be underestimated or for further surveys to not be undertaken.
Solution	Utilise all biodiversity record data sources available, such as NBN Atlas .

Document Reference(s): Chapter 6, Table 6-13 (sub-section Aquatic Ecology)	
Issue	White clawed crayfish surveys are absent from the Aquatic Ecology survey scope. This species is listed as an Annex II species within the Peak District Dale SAC and multiple records are located within 2km of the scoping boundary.
Impact	Potential for the presence of white clawed crayfish to not be established and appropriate mitigation to not be undertaken.
Solution	If watercourses within the scoping boundary are assessed as having suitable habitat for white clawed crayfish, further survey efforts should be undertaken to determine their presence/ absence following best practice guidance.

Document Reference(s): Chapter 6, Table 6-13 (sub-section Aquatic Ecology)	
Issue	Habitat condition assessments in the form of Modular River Physical (MoRPH) surveys are proposed for watercourses crossed by the scheme; however, a full River Condition Assessment (RCA) has not been proposed. MoRPH surveys only cover the field survey elements of the wider RCA which is required for reporting a watercourse's condition within the Biodiversity Net Gain Metric.
Impact	Relying solely on MoRPH survey data would result in non-compliance with Defra's Statutory Biodiversity metric guidelines which potentially leads to the incorrect classification of river habitat condition and inaccurate calculations of baseline biodiversity units.
Solution	To inform watercourse habitat condition, a full RCA should be undertaken by a qualified RCA assessor for all watercourses within the Order limits and all watercourses within 10m of the Order limits, in line with Defra's statutory biodiversity metric guidance.
Additional narrative/ explanation There is a minor typographical error in relation to the watercourse habitat condition assessment. Within Table 6-13, the MoRPH survey is followed by reference Ref 6-16. However, under the reference list, the link to the cartographer website is Ref 6-15.	

Marine

Document Reference(s): Chapter 3, Section 3.2 e.g. 3.2.137 (and other references in report to trenched pipe distance down foreshore)	
Issue	The reasonable worst-case footprint of the work in the transition from landfall to mean low water springs (MLWS) is not defined clearly.
Impact	Risk of under-assessing the impacts unless the scope is tightened. It could mean survey areas cannot be proportionately targeted and the Water Framework Directive (WFD) pathways (turbidity, morphology, bacteriological risk) cannot be scoped with confidence.
Solution	Provide a more clearly defined reasonable worst-case footprint (including maximum trench width, distance, method boundaries, sheet-piling limits, extent of nearshore working, or compound footprint) in the Environmental Statement.

Additional narrative/ explanation

Although the Scoping Report describes much of the potential activity, it provides general descriptions, with no clear overlay of the activity on the landfall to MLWS diagram to illustrate the two-pipe approach and the location of the open cut trench.

For example:

- Text refers to Plate 3-4 as the general approach to be taken for the open-cut trench installation for a coastal pipeline. But Plate 3-4 is representative of a single pipe and no piling approach.
- Text does say an indicative construction corridor “likely to be 50-100m” (see 3.2.136) or “approximately 100m” (section 4.3.5) but this is generalised language and not provided with evidence how this will be laid out.
- Likely use of trenchless methods beneath the embankment – with distance down the beach varying (and this figure appears to be measured from the as yet undefined landfall compound location (see 3.2.137), rather than the expected placement on the foreshore.

Document Reference(s): Chapter 6, Table 6-7

Issue	The above table implies that the Dee Estuary SAC and Mersey Narrows and North Wirral Foreshore Special Protection Area (SPA) are outside the scoping boundary when they are within the scoping boundary.
Impact	This statement is incorrect and the true activity and impact may not be assessed/considered.
Solution	Ensure Dee Estuary SAC and Mersey Narrows and North Wirral Foreshore SPA are included as within the scoping boundary.

Document Reference(s): Chapter 11, Section 11.5 and Table 11-11

Issue	Key protected sites are recognised, but impact pathways are not explained for shellfish waters and Bathing Waters. Please see additional narrative.
Impact	Risk that impact pathways will not be included in the Environmental Statement or WFD assessment.
Solution	Include Shellfish Water and Bathing Water pathway risk in the scope of assessment.

Additional narrative/ explanation

The Scoping Report does not provide:

- outline pathways linking the *proposed construction methods* to *site vulnerabilities*
- any indication of whether plume modelling, noise modelling, or morphological assessment will be undertaken

Although Moreton and Meols Bathing Waters (BW) and the North Wirral (West) Shellfish Waters and water framework waterbodies are listed as receptors in Table 11-11, the Scoping Report has no scoping narrative for these to consider:

- Trenching effects on bacteriological water quality for BW
- risks of short-term deterioration during construction (e.g. from sediment disturbance) for shellfish waters
- And changes to shellfish water quality resulting from contaminant mobilisation

Appendix B – General advice on the proposals and EIA content

Flood Risk

Document Reference(s): Chapter 11, Section 11.6.5	
Issue	New temporary access tracks may require the crossing of watercourses using culverts.
Impact	Culverting will have an adverse effect on the watercourse and flood risk.
Solution	Implement a minimal number of new crossings as possible. Main rivers should not be culverted. Additionally, all new crossings should be bridges which are as clear span as possible. Best practice requirement should be adhered to.
Additional narrative/ explanation It is best practice to adhere to the following requirements: • Soffit height of the bridge must be a minimum of 600mm above the 1 in 100 years plus climate change allowance flood level • All abutments must be set back a minimum 1m from the top of bank/landward toe of flood defences and as minimal as possible • Any loss of floodplain due to abutments and ramps will need to be compensated for • All parapets and railings need to be permeable and open as possible with a minimum 100mm spacing	

Flood Modelling

Document Reference(s): Chapter 11, section 11.8.2	
Issue	Baseline data from readily available sources, such as existing models, may be out of date.
Impact	Flood risk impacts to and because of the development could be inaccurately assessed.
Solution	The proposed development is within the vicinity of and crosses several watercourses where the Environment Agency holds detailed hydraulic modelling. Existing models should be assessed for their suitability and may require updating to account for the latest climate change allowances and hydrological methods. For further details please see the guidance on

	Using modelling for Flood Risk Assessment available online at: Using modelling for flood risk assessments - GOV.UK

Document Reference(s): Chapter 11	
Issue	Fluvial and tidal climate change uplifts are not prescribed in the scoping report.
Impact	Future flood risk impacts could be underestimated.
Solution	Ensure the appropriate climate change allowances are considered in the context of the development lifetime and vulnerability classification.
Additional narrative/ explanation The scoping report describes how climate change scenarios can be used to determine future fluvial and surface water flood extents. This is welcomed. For clarity, as the development would likely be classed as “Essential Infrastructure” the Higher Central and Upper allowance (where tidal) climate change allowance should be used. In addition, a Credible Maximum scenario should be considered as a sensitivity test so that the resilience of the development to future climate change can be properly understood. In the context of fluvial flooding the “Upper” climate change allowance can be used as a proxy for the Credible Maximum scenario. For tidal flooding, the H++ scenario should be used. Further details can be found on the guidance of Climate Change Allowances for Flood Risk Assessment available at: Flood risk assessments: climate change allowances - GOV.UK	

Water Resources

Document Reference(s): Chapter 3 and Chapter 11	
Issue	We agree that construction water demands should be scoped in. However, Table 11-15 only describes potable water demands.
Impact	The Derbyshire Derwent and Dove catchments have extremely limited water availability. Applications for new licences or increases to existing abstraction licences are likely to be refused or approved with extremely restrictive conditions. The Applicant should consider in detail what the construction water demands of the project are to ensure and plan for a secure and sustainable supply of water.
Solution	A water supply strategy should accompany (or be incorporated into) the Environmental Statement which evaluates construction water demands and evaluates options for sources of supply.

Additional narrative/ explanation The Environment Agency seeks confidence that a practical and sustainable water supply can be found to meet additional demands posed by the construction process within the Derbyshire Derwent and Dove catchments in particular. A water supply strategy should consider the following: • Broad estimates of volumes of water required for common construction activities (this can be estimated if not know exactly at this early stage) these include but are not limited to: ○ Potable supply to welfare stations ○ Dust suppression ○ Wheel wash; ○ Concrete batching • A review of water availability as set out in the catchment abstraction licensing strategies which apply to the development at different locations; • An appraisal of sources of supply which may include but are not limited to: ○ Water company supply – Early engagement advised and consideration for the practicality of mains supply in remote rural areas; ○ Third party tankering – Numbers of heavy goods vehicles (HGVs) and traffic movement should be considered ○ Surface water abstraction; ○ Groundwater abstraction; ○ Rainwater harvesting; ○ Currently held licences (which, in some cases already include dust suppression as a licensed activity) which are available to the scheme at each site and recent use to indicate headroom which may or may not be made available.	

Groundwater and Contaminated Land

Document Reference(s): Chapter 13	
Issue	Limited specific detail given.
Impact	Data presented to date will not be sufficient to characterise land and determine risk and mitigation.
Solution	Subsequent reports will need to build on the information presented to date and provide significant additional detail. This should include, but not

	be limited to, groundwater flooding, WFD Groundwater Bodies, groundwater abstractions (private and public), and references to water quality.
Additional narrative/ explanation	
Geological features such a sinks and springs are present within the vicinity of the route and must be considered when the final route is being decided. These could pose geotechnical risks. Poor design, management and mitigation in these areas may lead to risks to land and groundwater. We note that the Applicant has committed to significant further works, including sections 11.7.2, 11.8.7, 11.9.4 and Table 13-11.	

Document Reference(s): Chapter 13, Table 13-4	
Issue	Further consideration is needed for works in areas of former and active non-coal mining works.
Impact	Disturbing mining waste could lead to harm to construction workers or uncontrolled release of harmful substances to land and water. Routeing could be impacted by shafts, rakes, mines and former opencast workings.
Solution	Ensure detailed reports of all historical mining activities are obtained.
Additional narrative/ explanation	
The Applicant specifically mentions coal mine reports from the MRA. These may not include non-coal mining activities, such as metal mining, which has historically also been carried out in some areas of the route. We note that local authorities and The Mining Remediation Authority are consultees for this application (e.g. section 13.7.13, Table 13-15, and Table 13-16). The Applicant should review records on coal and non-coal mining activities.	

Document Reference(s): Chapter 13, Table 13-7	
Issue	It is stated that there are no source protection zones (SPZs) within pipeline east. Section 3 (North Feeder AGI to outside the Central Feeder AGI search area) passes through an SPZ3, with associated SPZ1 and SPZ2 >1km from the boundary.
Impact	Mitigation for works within SPZ3 may not be in place in this area.
Solution	Ensure SPZs are fully mapped and relevant mitigation is considered.

Additional narrative/ explanation

A plan of SPZs and other ground and groundwater receptors along the route may be beneficial.

Document Reference(s): Chapter 13, section 13.6.2

Issue	There should be specific mention of the impact on groundwater and geology, including geochemistry, from materials being left in the ground at and after decommissioning.
Impact	Degradation of materials over time and unmonitored leakage of any residual contaminants could cause harm to ground and groundwater.
Solution	This topic appears to be scoped in, albeit not explicitly, and specific mention in section 13.6.2 would provide greater surety of its inclusion.

Document Reference(s): Chapter 13, sections 13.7.2 to 13.7.6

Issue	Further guidance documents need to be considered.
Impact	All available guidance and best practice documents should be used by the Applicant to mitigate harm to ground and groundwater.
Solution	For completeness, consider referencing relevant British Standards here (as provided in the LCRM pages on GOV.UK). See also our groundwater protection position statements. Consider reference to EA and CL:AIRE guidance on piling into contaminated ground. Piling might not be proposed for the on-land works in this scheme, but similar techniques and considerations might be valuable.

Document Reference(s): Chapter 13, section 13.8.1

Issue	It is stated that infrastructure would be moved to avoid areas of potential contamination.
Impact	Potential to knowingly permit a 'groundwater activity' without appropriate authorisation or exemption if gross contamination is not managed correctly. Risk is posed to human health including groundworkers and the wider environment.
Solution	The Applicant must ensure that any legal obligations relating to management of known land contamination are followed and demonstrate

	that the contamination does not pose significant possibility of significant harm or significant possibility of significant pollution of controlled waters.
Additional narrative/ explanation The required actions will depend in part on whether the Applicant is the legal owner of the land at the time of the decision. The nature and extent of any potential or proven contamination will also determine the appropriate response. We suggest reference to: • Contaminated land statutory guidance - GOV.UK • Environmental Permitting Guidance Groundwater Activities Choosing to remediate a grossly contaminated site could be used as an opportunity for a positive impact from the scheme. We are satisfied that where infrastructure cannot be moved, ground remedial measures would be implemented and a Remediation Strategy devised and discussed with the regulatory authorities prior to any remedial works.	

Document Reference(s): Chapter 13, section 13.8.1	
Issue	There is no discussion of unexpected or previously unknown contamination being encountered during works.
Impact	If a protocol for how to manage unexpected contamination in accordance with Land Contamination Risk Management guidance is not proposed risks to controlled waters may not be adequately assessed and mitigated.
Solution	During construction and decommissioning there must be a procedure of actions to take in case unexpected or previously unknown contamination is encountered during works. This could be in the CEMP and DEMP; if so, it should be included in the outline copies when produced.

Document Reference(s): Chapter 18, tables 18-5 to 18-12	
Issue	Geology and groundwater (including SPZs and abstractions) are not included. We consider they should be as defined in 18.3.5 ("land, soil, water")
Impact	Risks to these receptors are not adequately considered.
Solution	Ensure risks to geology and groundwater and included in any subsequent work.

Water Quality

Document Reference(s): Chapter 3, Sections 3.2.11, 3.2.29, 3.2.45, 3.2.58 and 3.2.117	
Issue	A new substation may be included at each of the Breedon Capture Facility, Tarmac Cement Works, Buxton Lime Capture Facility, Holcim Capture Facility and Coastal AGI if power is supplied from the grid. Therefore, there are possible risks for water quality contamination in the event of a pollution incident or fire.
Impact	Firewater and other oil/ chemicals from a substation will deteriorate water quality unless it is contained and removed sufficiently.
Solution	The Applicant should make it clear that the Substations will be impermeably lined and have a sealed drainage system, which includes an automated shutoff valve. The relevant equipment at the substation should be banded.

Document Reference(s): Chapter 3, Sections 3.2.12, 3.2.16, 3.2.20, 3.2.31, 3.2.32, 3.2.46, 3.2.47 and 3.2.56; Chapter 11, Section 11.8.3	
Issue	Breedon Capture Facility, Tarmac Cement Works and Buxton Lime Capture Facility are proposed to potentially need a new on-site power generation station. It is unclear how the process waste water will be managed and if it will be discharged to the water environment.
Impact	If waste water is not managed it could introduce contaminants and thermal impacts, negatively affecting water quality.
Solution	The Applicant should provide details on water associated with power production. If any discharges are required, it should be acknowledged that a permit may be required.
Additional narrative/ explanation: See link for more details: Discharges to surface water and groundwater: environmental permits - GOV.UK It is acknowledged for Breedon Capture Facility that it states that excess wastewater will be treated to a standard suitable for surface water discharge via existing lagoons, and that water runoff will connect into the site-wide system. However, it is unclear how water in lagoons and runoff is disposed of or discharged.	

For Tarmac Cement Works, and Buxton Lime Capture Facility which operates within the same site, it says that condensate will be processed in a new water treatment plant but is unknown where water goes after the treatment plant. Whilst for cooling purposes a closed-circuit system is assumed, it should be clarified if this means for Tarmac Cement Works there will be no discharge of water.

Only section 3.2.56 for Holcim Capture Facility states that consideration of additional water and effluent treatment will be a key element, but this is not understood to be in relation to a power station.

We agree with section 11.8.3 which states, “However, some waste chemicals commonly associated with carbon capture technology, such as amine, should not be discharged to the water environment and will generally need to be taken offsite for appropriate disposal elsewhere.”

Document Reference(s): Chapter 3, Sections 3.2.81 and 3.2.136; Chapter 11, Section 11.6.4

Issue	Where HDD is proposed, there will be a risk of a frac-out.
Impact	If drilling fluid breaks out, it can negatively impact the water quality if it gets into watercourses.
Solution	The Applicant needs to commit to producing a Drilling Fluid Management Plan, as part of the CEMP. They should also consider if they can commit to the bentonite pellets being per- and polyfluoroalkyl substance (PFAS) free. Entry and exit pits must be at least 10m from top of bank of any watercourses.

Document Reference(s): Chapter 3, Sections 3.2.87 and 3.2.117; Chapter 11, Section 11.8.5

Issue	For the Peak Cluster Pipeline and Coastal AGI, site offices and welfare facilities are mentioned as key elements in Chapter 3, but it is unclear what the provision is for collection and disposal of foul waste. There is no mention of foul water for Breedon Capture Facility, Tarmac Cement Works, Buxton Lime Capture Facility and Holcim Capture Facility in their key elements of Chapter 3, however section 11.8.5 states that “It is expected that all of the existing cement and lime manufacturing sites have existing... foul drainage arrangements”. The details of how foul waste will be managed at these sites is unknown.

Impact	There is a requirement to ensure that foul water treatment and disposal is adequate to minimise risk to water quality.
Solution	The method of foul water containment and disposal at each facility, pipeline and phases should be included in the relevant documents.

Document Reference(s): Chapter 3, Section 3.2.96	
Issue:	The AGI site will incorporate a range of infrastructure, such as pipework and valves, instrumentation and sensors, cable trays, and electrical transformers. It is unclear how this will be managed to reduce risk of spills or fire.
Impact	Firewater and oil insulating medium associated with transformers will deteriorate water quality unless it is contained and removed sufficiently.
Solution	Similar to substations, if there is any risk of pollution incidents or fire risk then appropriate sealed drainage, bunding equipment and use of oil interceptors should be used.

Document Reference(s): Chapter 11, Table 11-1	
Issue	The above table omits to include two relevant pieces of legislation: - Bathing Water Regulations 2013 The Bathing Water Regulations 2013 - Water Supply Regulations 2016 The Water Supply (Water Quality) Regulations 2016
Impact	Section 10 of the proposed pipeline (North Wirral Coastal Path to MLWS) overlaps with two Bathing Water Areas – Moreton (UK40900) and Meols (UK40800). If important legislation is omitted, then suitable protections may not be secured.
Solution	The Applicant should update Table 11-1 to ensure correct legislation is included.

Document Reference(s): Chapter 11, Table 11-12	
Issue	In above table doesn't recognise social use of bathing.
Impact	Given that section 10 of the proposed pipeline (North Wirral Coastal Path to MLWS) overlaps with two Bathing Water Areas – Moreton

	(UK40900) and Meols (UK40800) this social importance should be acknowledged.
Solution	The Applicant should update the table to ensure correct importance is included.

Document Reference(s): Chapter 11, Sections 11.6.2 and 11.9.3	
Issue	Section 11.6.2 says that there may be a Water Quality Monitoring Plan, this lacks certainty. Section 11.9.3 suggests that no water quality, flow or other monitoring is proposed, we disagree with this.
Impact	If a monitoring plan is not suitably designed then it may not be able to detect relevant trends, if any, on water quality during the phases of the project.
Solution	A monitoring plan should be produced, and it should provide details of frequency, quantity, location and method of monitoring. These locations should include monitoring upstream and downstream of any proposed surface water outfalls and water crossings. Methods may include in-situ handheld devices or samples sent off to UKAS (United Kingdom Accreditation Service) accredited laboratories. This is best practice on many recent projects. Monitoring should start prior to construction to ensure an accurate baseline, and continue all throughout construction, and into the operation to ensure that all mitigation measures are acting as expected and ensure there is no risk to water quality from the project.
Additional narrative/ explanation Omission to undertake monitoring could lead to misidentification of sensitivity levels of watercourses due to assumption that watercourses with lower flows (low Q95 scores) are less sensitive to alterations, for water quality this is often not the case, especially where base flows may be supplemented by treated discharge. Interruptions in natural base flow may lead to greater proportion of discharge within the watercourse, thereby reducing water quality. Reduction of natural base flow via, e.g. u/s or d/s culverting may also lead to reduction in hydromorphic work, possibly leading to detriment in WFD status of watercourse or WFD status of the d/s waterbody that the watercourse flows into.	

Document Reference(s): Chapter 11, Section 11.9.1

Issue	Olfactory observations regarding water quality of water features will be undertaken as part of the planned surveys.
Impact	Olfactory observations are not generally a reliable indicator of the quality of the water flowing in a watercourse.
Solution	Water quality samples, such as water samples (pH, metals etc) using approved water sampling techniques, should be taken at the survey locations to supplement the qualitative observations of the surveyor.

Biodiversity

Document Reference(s): Whole scoping report	
Issue	Omission to include reference to watercourse buffer zones.
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	Maintain a riparian buffer around all watercourses including rivers and ditches at a 10-metre minimum from the top of the bank to align with BNG guidance (see additional narrative).
Additional narrative/ explanation The 10-metre 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 During the construction phase, temporary construction compounds within 15 metres of watercourses could be screened with fencing on sides adjacent to the watercourse, and working lighting could be positioned to avoid light-spill onto sections of the watercourse. Both measures would lower the risk of disturbance to riparian mammals occupying the watercourse.	

Document Reference(s): Chapter 11, Section 11.6.5	
Issue	New temporary access tracks may require the crossing of smaller watercourses using culverts.
Impact	Culverts have the potential to impact upon the riparian zone, fragmenting habitats, creating barriers to mammal passage and altering natural flows and sediment transport.
Solution	Avoid the use of culverts. Use the water crossing hierarchy when determining watercourse crossings (see additional narrative).
Additional narrative/ explanation Open span crossings with set-back abutments are preferred for all uses (permanent and temporary). If open span is not suitable, then arched or three-sided culverts, which do not interfere with the channel bed and allow passage of water and sediment downstream, are the next best choice. There may be potential for existing watercourse crossing points to be improved for ecology. For example, removal of a culvert and replace with an open span bridge. This option could be explored to provide watercourse units for the Biodiversity Net Gain metric.	

Geomorphology

Document Reference(s): Chapter 3, Sections 3.2.137 and 3.2.142	
Issue	Open cut trenching is proposed in the intertidal zone.
Impact	Given the dynamic nature of the coastal environment at this location, there is the possibility of the interruption of sedimentary processes and possible changes in wave climate leading to impacts on the foreshore, especially with the use of sheet piling to maintain the open cut trench corridor.
Solution	Consider using a trenchless technique to MLWS, such as micro-tunnel or tunnel boring machine, to avoid impacts to the intertidal area.

Document Reference(s): Chapter 3, Section 3.2.146; Chapter 12, Section 12.2.20	
Issue	It is proposed that the pipeline would remain in-situ following decommissioning.
Impact	Given the dynamic nature of the intertidal environment, possible changes in climatic conditions and potential changes in sediment movement

	pathways, there is the possibility that the pipeline, if left in situ, will be exposed by erosional forces and become a hazard.
Solution	The DEMP should include the possibility of pipeline exposure in the future. The plan should include procedures and funding mechanisms to deal with such issues if/ when they occur in the future, regardless of which organisation/ authority is in existence at that time. Potential pipeline exposure in the fluvial environment via lateral movement across the floodplain or lowering of riverbeds due to increased activity should also be considered and planned for in the DEMP.

Marine

Document Reference(s): Chapter 3, Section 3.4.6	
Issue	The report states that the Wirral has been chosen as the preferred landfill Strategic Opportunity Corridor (SOC) option as it best meets the Project Value Measures and in so doing is the option best aligned to the tests within the National Permitting Service (NPS). One of the ways it is said to meet the tests set out in the NPS is that <i>“It minimises potential for impacts to International Conservation Designations, which are afforded the highest level of biodiversity protection, through use of trenchless techniques to minimise works within the Dee Estuary SAC, in line with NPS EN-1”</i>. We do not believe this statement is correct as the report also states that the proposed development will have significant open cut trenching across the width of the Dee Estuary SAC (e.g. Section 3.2.137).
Impact	This statement is incorrect and not representative of the true activity and impact.
Solution	Provide the correct statement in documents going forward to clarify that there is trenching across the Dee Estuary SAC.

Document Reference(s): Chapter 19, Section 19.4.2	
Issue	It is not clear if the additional high level overview report mentioned forms part of the Environmental Statement and how this sits alongside the cumulative effects assessment already planned.
Impact	There is work undertaken below the MLWS that creates a functional overlap between the offshore installation operations and the intertidal

	MLWS zone — a point important for EIA, Marine Management Organisation (MMO) licensing, and WFD assessment.
Solution	Ensure that this activity is included within the cumulative assessment for both the Environmental Statement and the WFD assessment.

Appendix C – Additional advice for the Applicant

Construction compounds (Section 3.2.87)

Further understanding of the drainage management, such as SuDS types proposed, is requested in the Preliminary Environmental Information Report (PEIR).

Mitigation measures to manage vehicle/ plant storage and associated fuel storage should be described in an outline CEMP.

Coastal AGI (Section 3.2.117)

For key elements of the coastal AGI, it is unclear how 'Landscaping and drainage areas' and 'Drainage / utilities' are different. The Applicant should explain this.

OEMP (Section 11.6.2)

Section 11.6.2 says that there will be an Outline CEMP and an Outline Demolition EMP, however it is unclear if there will be an OEMP. We recommend an OEMP is produced to manage matters during maintenance and normal procedures.

Drainage strategy (Sections 11.6.2 and 11.6.6)

It is suggested in section 11.6.6 that surface water runoff will be managed to ensure the required attenuation and treatment prior to discharge from the site in accordance with the drainage hierarchy. It also says that any discharges of process water will also need to be carefully managed with appropriate treatment. It should be acknowledged by the Applicant that any discharges may require a permit. See link for more details: [Discharges to surface water and groundwater: environmental permits - GOV.UK](#)

Section 11.6.2 says that it may include a Water Management Plan (WMP), we would recommend this is produced for all phases to detail the management of surface water runoff.

Water Receptors (Tables 18-5 to 18-12)

In Table 18-5 to Table 18-12 the Major Events Receptor heading is called "Main rivers, ordinary watercourses, canals" but then in the Description only Main rivers are named. It is unclear if this is because there are no ordinary watercourses or canals nearby, or if there are too many to name. The Applicant should clarify this.

In Table 18-9 to Table 18-12, main rivers aren't named, it states, "The Pipeline route passes through multiple water features". We recommend fully listing them in the table or providing the reference number for another section where they can be read.

Proposed Structure of the Environmental Statement (Table 20-1)

We request that the Applicant considers if the current proposed structure of the Environmental Statement (in Table 20-1) will be very repetitive. For instance, will

each of the Environmental Statement Volume III to VII all have their own Chapter 8: Water Environment and Flood Risk? Furthermore, will the different Volume (b) Technical Appendices mean that there will be multiple WFD Assessments or Drainage Strategy, for instance, for each of the facilities and pipeline sections?

Construction impacts (Section 6.6.1)

Given the scale of the proposal and significance of the pipeline, it should be ensured that the list of construction impacts is complete. The EIA should approach the impact-pathway-receptor model in a precautionary way in order to ensure a comprehensive assessment.

Impacts on diadromous fish (Section 12.2.19)

Impacts on diadromous fish from noise and vibration, changes in water quality from capital and maintenance dredging (and disposal) needs to be assessed in detail. The assessment should include an understanding of the likely underwater noise and how it will affect receptors. Furthermore, the assessment should present what the size of the plume might be from dredging and what the levels of water quality will be and how this will affect diadromous fish. Details on the methods of dredging proposed should be presented as certain methods such as suction dredging and water injection dredging can negatively impact on European eel and may require compliance with The Eels (England Wales) Regulations 2009.

Data Sources (Section 12.2.4)

Summary of data sources should include the Environment Agency's own data on benthic plants and animals found on Defra Digital Services Platform (<https://environment.data.gov.uk/>) open data in full, or for benthic invertebrates and fish, via the EA Ecology & Fish Data Explorer tool (<https://environment.data.gov.uk/ecology/explorer/>).

The marine plants data the Environment Agency hold is on open data, and spatial data held on the Multi-Agency Geographic Information for the Countryside (MAGIC) Interactive Map MAGIC Interactive Map (<https://magic.defra.gov.uk/>). MAGIC holds Information on the WFD high sensitivity and lower sensitivity habitats defined by WFD as well as a layer of the Environment Agency saltmarsh.

A search of the benthic invertebrate data held on Centre for Environment, Fisheries and Aquaculture Science (Cefas) One Benthic data portal is also recommended.

Landfall and watercourse crossings

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 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.
- Position of HDD/trenchless crossing should also take into consideration lateral movement of the watercourse. Ideally trenchless crossings should be launched/received outside of the floodplain.
- 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. Decommissioning plans should therefore take these factors into consideration and consider removal of such infrastructure at decommissioning or at any time after.
- Consider opportunities to deliver WFD mitigation measures, including Nature-based Solutions (NbS), as part of the design.
- Avoid preventing delivery of mitigation measures, e.g. avoid bringing cables/pipelines to surface level in floodplains earmarked for future river restoration (see note above regarding launch/ reception locations).

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 10km² connected to a downstream WFD waterbody take the classification of that d/s waterbody.
- ii. BNG guidelines indicate that structures built within 10 metres 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 [EA] 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 bank top 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 the satisfaction of the Environment Agency.

- 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 [Environment Agency] 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. *[NB this has been referred to in the EIA scoping bibliography]*.

Water course 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.

Landslide risk

It should be noted that there may be landslide risk associated with the proposed development particularly on the Mam Tor slopes and in other areas in the Peak District due to subsidence from old mineshafts. If a landslide was to occur and debris

were to enter a watercourse it could cause blockages, flooding upstream or diversion of the flow to one side of the channel, restricting channel width which would result in greater speed of flow. This risk should be considered during the production of environmental management plans supporting this scheme.

Opportunities for Environmental Betterment

We encourage the Applicant to engage with us regarding opportunities for environmental betterment and BNG through supporting the delivery of local projects. For example, there are a number of opportunities to improve fish migration on watercourses that the scheme proposes to cross. The project should look to incorporate such opportunities as part of the compensation and mitigation package, such as where impacts cannot be avoided or where there are residual effects after mitigation.

General Errors and Omissions

A typographical error is present within section 6.5 of the Main Report which states that results of the Aquatic Ecology Baseline are in Appendix F of Volume 2 Appendices. However, the Aquatic Ecology Environment Agency Data Gap Analysis is within Appendix E.

It appears that sections 12.4.18 and 12.4.19 are a repetition of 12.4.15 and 12.4.16. If alternative text should have been supplied for either set of paragraphs, we would appreciate sight of this for completeness.

Environmental Permitting Advice

Flood Risk Activity Permits (FRAPs) and associated disapplication of legislation

The Environmental Permitting (England and Wales) Regulations 2016 require a permit or exemption to be obtained for any of the following activities:

- erecting any temporary or permanent structure in, over or under a main river, such as a culvert, outfall, weir, dam, pipe crossing, erosion protection, scaffolding or bridge
- altering, repairing or maintaining any temporary or permanent structure in, over or under a main river, where the work could affect the flow of water in the river or affect any drainage work
- building or altering any permanent or temporary structure designed to contain or divert flood waters from a main river
- dredging, raising or removing any material from a main river, including when you are intending to improve flow in the river or use the materials removed
- diverting or impounding the flow of water or changing the level of water in a main river
- quarrying or excavation within 16 metres of any main river, flood defence (including a remote defence) or culvert

- any activity within 8 metres of the bank of a main river, or 16 metres if it is a tidal main river
- any activity within 8 metres of any flood defence structure or culvert on a main river, or 16 metres on a tidal river
- any activity within 16 metres of a sea defence structure
- activities carried out on the floodplain of a main river, more than 8 metres from the river bank, culvert or flood defence structure (or 16 metres if it is a tidal main river), if you do not 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 DCO has been approved, and we advise the Applicant to consult us at the earliest opportunity.

Disapplication of FRAPs

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.

Installations

The proposal includes carbon capture facilities at four cement and lime plants in Derbyshire and Staffordshire:

- Breedon (Hope Cement Works)
- Tarmac (Tunstead Cement Works)
- Buxton Lime
- Holcim (Cauldon Cement Works)

These sites already operate under existing Environmental Permits which regulate the current cement and lime production activities as A1 installations, under the Environmental Permitting (England and Wales) Regulations.

The introduction of carbon capture facilities at these sites will require permit variations or new permits. As part of this, the proposed technology would require a Best Available Techniques (BAT) assessment.

We recommend parallel tracking the DCO application and permit applications. This is beneficial because:

- It offers the best option for ensuring that all issues can be identified and resolved, where possible, at the earliest possible stages.
- It will enable the Examining Authority to be confident that the design being assessed is capable of being permitted.
- Will avoid the potential need for amendments to the DCO post-permission.

The Applicant is advised to engage with us via our permitting pre-application service at their earliest convenience. Further details are available here: [Get advice before you apply for an environmental permit - GOV.UK](#). The Applicant should also be aware of our major project coordination service, which may be suitable for this project: [Request environmental permit coordination for major projects - GOV.UK](#).

Other regulated industrial Installations and Control of Major Accident Hazards Regulations (COMAH) sites

It is noted that Chapter 18 considers potential impacts of technological or manmade hazards and interaction with the pipeline with specific reference to COMAH sites. However, there are also a number of industrial Installations permitted under the Environmental Permitting (England and Wales) Regulations 2016, within the Study Area. These sites often hold chemical inventory and fuel, and it is therefore recommended that their inter-relationship with the pipeline and the potential for events to occur which could lead to potential incidents is also explored and included within the Environmental Statement.

Landfill sites

The Applicant should note the presence of the installations landfill Danes Moss, which is situated near the proposed development.

Further discussions will be required if there are impacts to permitted landfill sites.

We provide the following comments with regards to surrendered landfill sites:

- EAWML 53842 Golden Nook “British Waterways” (Pipeline Section 7) (Grid Ref SJ 47966 61804) is a surrendered landfill. Canal dredgings were deposited including small quantities of organic matter (plants) as well as oils released from canal boats. The site was granted a low risk surrender in 2023. There is potential for noxious gases and contaminated liquids (leachate) in the waste body. Any material removed should be transferred to an appropriately permitted facility.

- 53907 Annaban (Pipeline Section 9) (Grid Ref : SJ 25299 90696) was a non-engineered landfill that was permitted from 1988 to take a mix of wastes including asbestos contaminated, and wood contaminated, materials. The permit was varied so that the site could only accept inert waste from 1994. The permit was varied to stop waste acceptance in 2015 and the permit holder company dissolved in May 2021 when the site was then deemed “abandoned”. There is potential for exposure to asbestos, landfill gas and to contaminated liquors (leachate) whilst working within or close to the waste body. The adjacent historic site to the East will likely have similar issues. There is potential for asbestos, noxious gases and contaminated liquids (leachate) in the waste body. Any material removed should be transferred to an appropriately permitted facility.

Abstraction licensing

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](#).

If the dewatering activity can be demonstrated to be discharged to the same source of supply without intervening use (i.e. non-consumptive), this will increase the likelihood of a licence being granted.

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.

Waste on-site

Excavated materials that are recovered via a treatment operation can be re-used on-site under the CL:AIRE Definition of Waste: Development Industry Code of Practice. This voluntary Code of Practice provides a framework for determining whether excavated material arising from site during remediation or land development works are waste.

Developers should ensure that all contaminated materials are adequately characterised both chemically and physically, and that the permitting status of any proposed on-site operations are clear. If in doubt, the Environment Agency should be contacted for advice at an early stage to avoid any delays.

The Environment Agency recommends that developers should refer to:

- [CL:AIRE Definition of Waste: Code of Practice](#)
- [EA Regulatory Position Statement 215](#): Treating small volumes of contaminated soil and groundwater

Waste to be taken off site

Contaminated soil that is, or must be, disposed of, is waste. Therefore, its handling, transport, treatment and disposal is subject to waste management legislation, which includes:

- Duty of Care Regulations 1991
- Hazardous Waste (England and Wales) Regulations 2005
- Environmental Permitting (England and Wales) Regulations 2010
- The Waste (England and Wales) Regulations 2011

Developers should ensure that all contaminated materials are adequately characterised both chemically and physically in line with British Standards BS EN 14899:2005 'Characterisation of Waste - Sampling of Waste Materials - Framework for the Preparation and Application of a Sampling Plan'. The permitting status of any proposed treatment or disposal activity should be clear. If in doubt, the Environment Agency should be contacted for advice at an early stage to avoid any delays.

If the total quantity of waste material to be produced at or taken off site is hazardous waste and is 500kg or greater in any 12-month period, the developer will need to

register with us as a hazardous waste producer. Refer to [our website](#) for more information.

Control of emissions from non-road going mobile machinery (NRMM)

Where development involves the use of any NRMM with a net rated power of 37kW and up to 560kW, that is used during site preparation, construction, demolition, and/or operation, at that site, we strongly recommend that the machinery used shall meet or exceed the latest emissions standards set out in [Regulation \(EU\) 2016/1628 \(as amended\)](#). This shall apply to the point that the machinery arrives on site, regardless of it being hired or purchased, unless agreed in writing with the Local Planning Authority (LPA).

This is particularly important for major residential, commercial, or industrial development located in or within 2km of an Air Quality Management Area for oxides of Nitrogen (NO_x), and or particulate matter that has an aerodynamic diameter of 10 or 2.5 microns (PM₁₀ and PM_{2.5}). Use of low emission technology will improve or maintain air quality and support LPAs and developers in improving and maintaining local air quality standards and support their net zero objectives.

We also advise, the item(s) of machinery must also be registered (where a register is available) for inspection by the appropriate Competent Authority (CA), which is usually the local authority. The requirement to include this may already be required by a policy in the local plan or strategic spatial strategy document.

The Environment Agency can also require this same standard to be applied to sites which it regulates. To avoid dual regulation this informative should only be applied to the site preparation, construction, and demolition phases at sites that may require an environmental permit.

NRMM includes items of plant such as bucket loaders, forklift trucks, excavators, 360 grab, mobile cranes, machine lifts, generators, static pumps, piling rigs etc. The Applicant should be able to state or confirm the use of such machinery in their application to which this then can be applied.

Environment Agency Land Interests

The Environment Agency has numerous land interests which fall within the scoping boundary. These land interests relate to various boreholes. It is unclear at this stage whether this land will be affected by the proposals and to what extent.

The Applicant contact the Environment Agency's Estates team directly at their earliest convenience to discuss all interactions between the proposed development and Environment Agency land. Please contact our Estates team on the following details: EstatesLandEng@environment-agency.gov.uk.

From: [Town Clerk - FTC](#)
To: [Peak Cluster CCS Pipeline](#)
Subject: RE: EN0710001 - Peak Cluster CCS Pipeline - EIA Scoping Consultation and Notification
Date: 23 January 2026 12:22:24
Attachments: [image004.png](#)
[image005.png](#)
[image006.png](#)
[image008.png](#)
[image009.png](#)
[image010.png](#)
[image001.png](#)
[image002.png](#)

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Can you please accept these revised comments please.

Regards.

Please accept the following revised response from Flint Town Council:

Our Planning Committee has reviewed the notification. We note that the proposed pipeline corridor appears to reach the coast via the Wirral peninsula and does not physically pass through our town's administrative boundary.

However, given our location and our current involvement in the examination phase of the Connah's Quay Low Carbon Power project, we wish to make the following observations for the Scoping Opinion:

- **Cumulative Impacts:** The Environmental Statement should specifically consider the cumulative environmental and logistical impacts of this project alongside other active NSIP developments in the Dee Estuary and North Wales region, including the HyNet and Connah's Quay infrastructure.
- **Transboundary Effects:** Any potential impacts on the marine environment of the Dee Estuary or the Irish Sea during the offshore phase of construction should be thoroughly scoped.
- **Historical Sites:** The Council is aware of the potential impact of the pipeline on sites of historical interest on the Wirral. Given the long-standing links between Flint and the Wirral across the River Dee, the Council has an interest in the preservation of any sites that may be uncovered during future pipeline works.

We have no further technical comments or specific data to provide under Regulation 11(3) at this stage. We look forward to being kept informed as the project progresses to the formal application stage.



FLINT TOWN COUNCIL / CYNGOR TREF Y FFLINT

[REDACTED], Town Clerk

Email: townclerk@flinttowncouncil.gov.wales

Telephone number: [REDACTED]

Town Hall, Market Square, Flint, CH6 5NW

From: Town Clerk - FTC

Sent: 21 January 2026 14:46

To: 'Peak Cluster CCS Pipeline' <PeakClusterCCS@planninginspectorate.gov.uk>

Subject: RE: EN0710001 - Peak Cluster CCS Pipeline - EIA Scoping Consultation and Notification

Please accept the below response from Flint Town Council:

Our Planning Committee has reviewed the notification. We note that the proposed pipeline corridor appears to reach the coast via the Wirral peninsula and does not physically pass through our town's administrative boundary.

However, given our location and our current involvement in the examination phase of the Connah's Quay Low Carbon Power project, we wish to make the following observations for the Scoping Opinion:

Cumulative Impacts: The Environmental Statement should specifically consider the cumulative environmental and logistical impacts of this project alongside other active NSIP developments in the Dee Estuary and North Wales region, including the HyNet and Connah's Quay infrastructure.

Transboundary Effects: Any potential impacts on the marine environment of the Dee Estuary or the Irish Sea during the offshore phase of construction should be thoroughly scoped.

We have no further technical comments or specific data to provide under Regulation 11(3) at this stage. We look forward to being kept informed as the project progresses to the formal application stage.



FLINT TOWN COUNCIL / CYNGOR TREF Y FFLINT

[REDACTED], Town Clerk

Email: townclerk@flinttowncouncil.gov.wales

Telephone number: [REDACTED]

Town Hall, Market Square, Flint, CH6 5NW

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

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

Ref: EN0710001

Date: 10 February 2026

Dear Sir/Madam

Planning Application for **Peak Cluster CCS Pipeline**

Thank you for seeking the Forestry Commission's advice about the impact that this application may have on Ancient Woodland. As a non-statutory consultee, the Forestry Commission is pleased to provide you with the attached information that may be helpful when you consider the application:

- Details of Government Policy relating to ancient woodland
- Information on the importance and designation of ancient woodland

Ancient woodlands are irreplaceable. They have great value because they have a long history of woodland cover, with many features remaining undisturbed. This applies equally to Ancient Semi Natural Woodland (ASNW) and Plantations on Ancient Woodland Sites (PAWS).

It is Government policy to refuse development that will result in the loss or deterioration of irreplaceable habitats including ancient woodland, unless "*there are wholly exceptional reasons, and a suitable compensation strategy exists*" (National Planning Policy Framework paragraph 193).

We also particularly refer you to further technical information set out in Natural England and Forestry Commission's Standing Advice on Ancient Woodland – plus supporting Assessment Guide and Case Decisions.

As a Non-Ministerial Government Department, we provide no opinion supporting or objecting to an application. Rather we are including information on the potential impact that the proposed development would have on the ancient woodland.

Part of the development site is on land adjacent to an ancient woodland site. For ancient woodlands, any proposal should have a buffer zone of at least 15 metres from the boundary of the woodland to avoid root damage (known as the root protection area). Where possible, a buffer zone should:

- contribute to wider ecological networks
- be part of the green infrastructure of the area

A buffer zone should consist of semi-natural habitats such as:

- woodland
- a mix of scrub, grassland, heathland and wetland

Development proposals within a buffer zone should not be approved.

Subsequent Enforcement Notices may be materially relevant to planning applications in situations where the site looks to have been cleared prior to a planning application having been submitted or approved.

If the planning authority takes the decision to approve this application, we may be able to give further support in developing appropriate conditions in relation to woodland management mitigation or compensation measures. Please note however that the Standing Advice states that *"Ancient woodland, ancient trees and veteran trees are irreplaceable. Consequently, you should not consider proposed compensation measures as part of your assessment of the merits of the development proposal."*

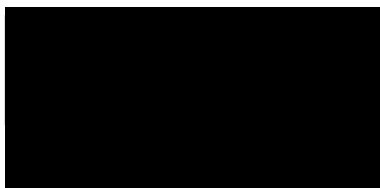
We suggest that you take regard to any points provided by Natural England about the biodiversity of the woodland.

The Town and Country Planning (Consultation) (England) Direction 2024 (published January 2024) requires local planning authorities in England to consult the Secretary of State before granting planning permission for certain types of development, including development that affects ancient woodland: The Town and Country Planning (Consultation) (England) Direction 2024 - GOV.UK (www.gov.uk).

As a result, if impacts cannot be avoided or fully mitigated against, wholly exceptional reasons apply, a suitable compensation strategy exists, and local planning authorities intend to grant planning permission for development that would result in loss or deterioration of ancient woodland, the authority is required to consult the Secretary of State for Housing, Communities and Local Government before granting planning permission.

We hope these comments are helpful to you. If you have any further queries, please do not hesitate to contact me.

Yours sincerely



Area Admin Officer

A summary of Government policy on ancient woodland

Natural Environment and Rural Communities Act 2006 (published October 2006).

Section 40 – “Every public authority must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity”.

National Planning Policy Framework (published December 2024).

Paragraph 193 – “*development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists*”.

National Planning Practice Guidance – Natural Environment Guidance. (published March 2014)

This Guidance supports the implementation and interpretation of the National Planning Policy Framework. This section outlines the Forestry Commission’s role as a non statutory consultee on “*development proposals that contain or are likely to affect Ancient Semi-Natural woodlands or Plantations on Ancient Woodlands Sites (PAWS) (as defined and recorded in Natural England’s Ancient Woodland Inventory), including proposals where any part of the development site is within 500 metres of an ancient semi-natural woodland or ancient replanted woodland, and where the development would involve erecting new buildings, or extending the footprint of existing buildings*”

It also notes that ancient woodland is an irreplaceable habitat, and that, in planning decisions, **Plantations on Ancient Woodland Sites (PAWS) should be treated equally in terms of the protection afforded to ancient woodland in the National Planning Policy Framework**. It highlights the Ancient Woodland Inventory as a way to find out if a woodland is ancient.

The UK Forestry Standard (5th edition published March 2025).

Page 23: “Areas of woodland are material considerations in the planning process and may be protected in local authority Area Plans. These plans pay particular attention to woods listed on the Ancient Woodland Inventory and areas identified as Sites of Local Nature Conservation Importance SLNCIs)”.

Keepers of Time – A Statement of Policy for England’s Ancient and Native Woodland (published June 2005).

Page 10 “The existing area of ancient woodland should be maintained and there should be a net increase in the area of native woodland”.

Natural Environment White Paper “The Natural Choice” (published June 2011)

Paragraph 2.53 - This has a “renewed commitment to conserving and restoring ancient woodlands”.

Paragraph 2.56 – “The Government is committed to providing appropriate protection to ancient woodlands and to more restoration of plantations on ancient woodland sites”.

Standing Advice for Ancient Woodland and Veteran Trees (first published October 2014, revised 14 July 2022)

This advice, issued jointly by Natural England and the Forestry Commission, is a material consideration for planning decisions across England. It explains the definition of ancient woodland, its importance, ways to identify it and the policies that are relevant to it.

The Standing Advice refers to an Assessment Guide. This guide sets out a series of questions to help planners assess the impact of the proposed development on the ancient woodland.

Biodiversity 2020: a strategy for England's wildlife and ecosystem services (published August 2011).

Paragraph 2.16 - Further commitments to protect ancient woodland and to continue restoration of Plantations on Ancient Woodland Sites (PAWS).

Importance and Designation of Ancient and Native Woodland

Ancient Semi Natural Woodland (ASNW)

Woodland composed of mainly native trees and shrubs derived from natural seedfall or coppice rather than from planting, and known to be continuously present on the site since at least AD 1600. Ancient Woodland sites are shown on Natural England's Inventory of Ancient Woodland.

Plantations on Ancient Woodland Site (PAWS)

Woodlands derived from past planting, but on sites known to be continuously wooded in one form or another since at least AD 1600. They can be replanted with conifer and broadleaved trees and can retain ancient woodland features, such as undisturbed soil, ground flora and fungi. Very old PAWS composed of native species can have characteristics of ASNW. Ancient Woodland sites (including PAWS) are on Natural England's Inventory of Ancient Woodland.

Other Semi-Natural Woodland (OSNW)

Woodland which has arisen since AD 1600, is derived from natural seedfall or planting and consists of at least 80% locally native trees and shrubs (i.e., species historically found in England that would arise naturally on the site). Sometimes known as 'recent semi-natural woodland'.

Other woodlands may have developed considerable ecological value, especially if they have been established on cultivated land or been present for many decades.

Information Tools – The Ancient Woodland Inventory

This is described as provisional because new information may become available that shows that woods not on the inventory are likely to be ancient or, occasionally, vice versa. In addition ancient woods less than two hectares or open woodland such as ancient wood-pasture sites were generally not included on the inventories. For more technical detail see [Natural England's Ancient Woodland Inventory](#). Inspection may determine that other areas qualify.

As an example of further information becoming available, Wealden District Council, in partnership with the Forestry Commission, Countryside Agency, the Woodland Trust and the High Weald AONB revised the inventory in their district, including areas under 2ha. Some other local authorities have taken this approach.

Further Guidance

Felling Licences - Under the Forestry Act (1967) a Felling Licence is required for felling more than 5 cubic metres per calendar quarter. Failure to obtain a licence may lead to prosecution and the issue of a restocking notice.

Environmental Impact Assessment - Under the Environmental Impact Assessment (Forestry) (England and Wales) Regulations 1999, as amended, deforestation which is likely to have a significant impact on the environment may also require formal consent from the Forestry Commission.

From: clerk@goostreyparishcouncil.gov.uk
To: [Peak Cluster CCS Pipeline](#)
Subject: Scoping Consultation Response
Date: 27 January 2026 21:42:53

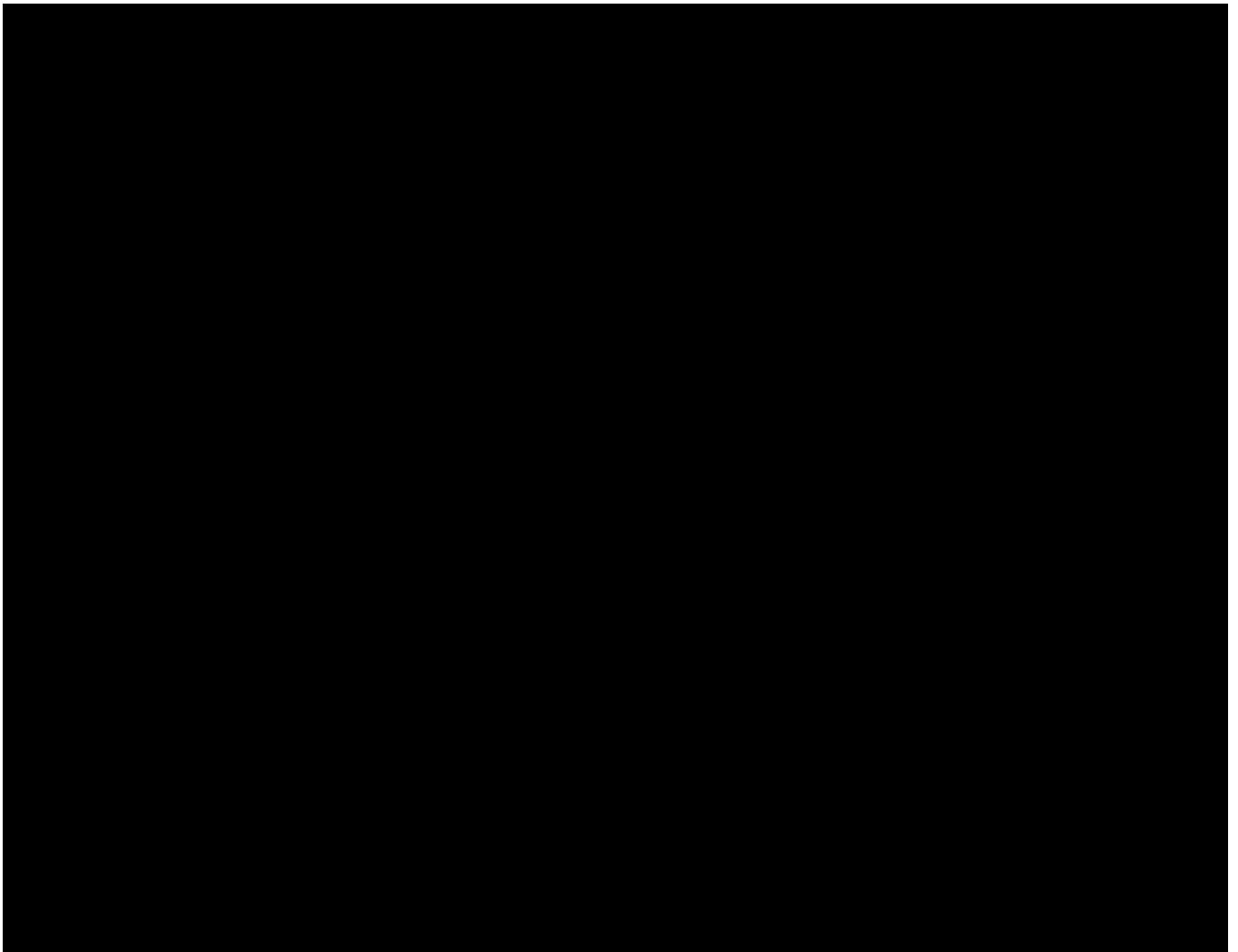
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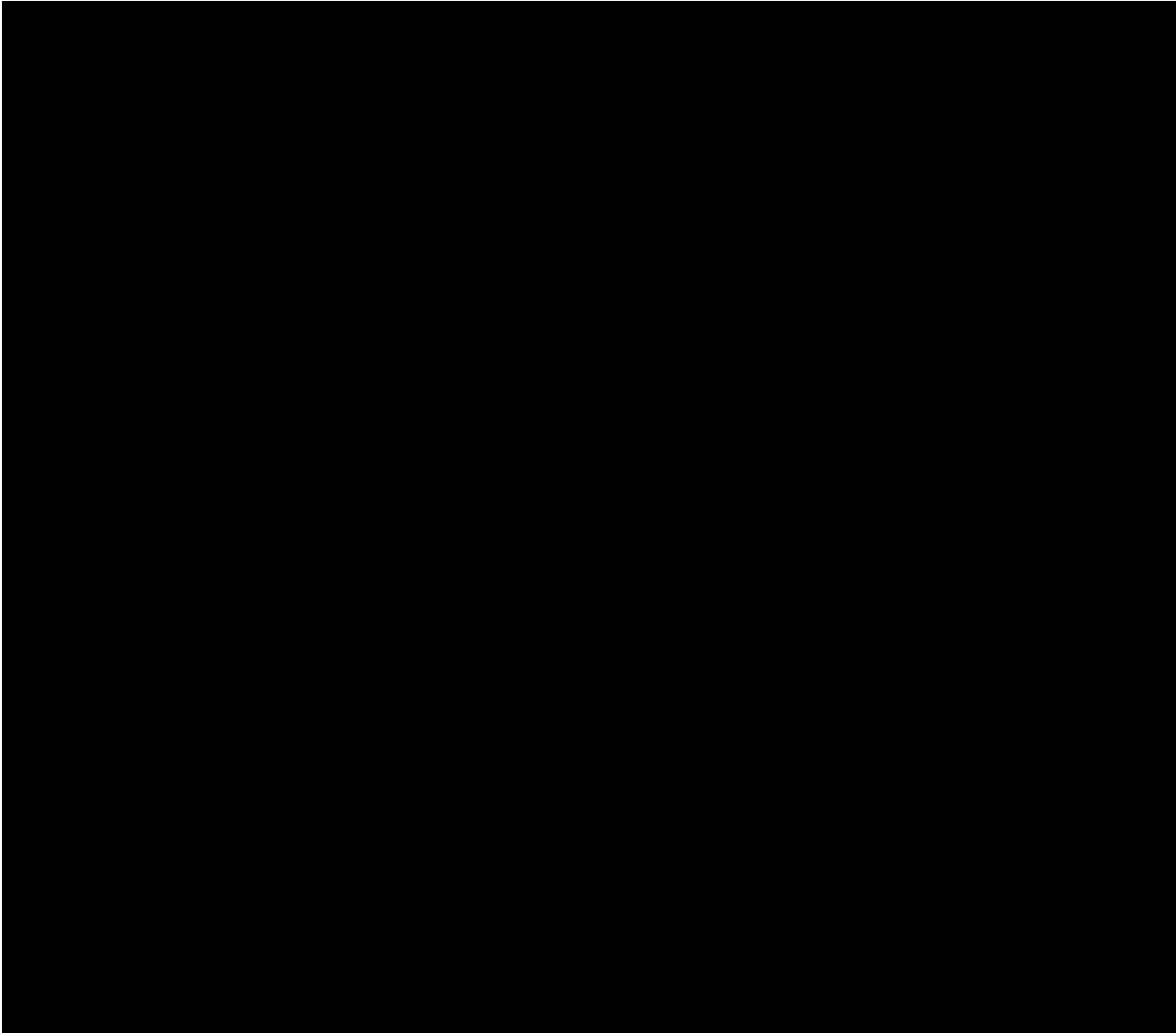
Dear Sir,

Goostrey Parish Council has no comment to make at this time but would like to be kept informed throughout the process.

-

Kind regards





Clerk to Goostrey Parish Council

Telephone [REDACTED]

Confidentiality: This email and its contents and any attachments are intended only for the above named. As the email may contain confidential or legally privileged information, if you are not the above named person or responsible for delivery to the above named, or suspect that you are not an intended recipient please delete or destroy the email and any attachments immediately.

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From: [REDACTED]
To: [Peak Cluster CCS Pipeline](#)
Subject: Scoping Consultation - EN0710001
Date: 05 February 2026 16:54:46

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Hello all,

I can confirm that Great Boughton Parish Council has considered the Peak Cluster scoping consultation request at its meeting on 19th January 2026, and that the Parish Council has no comments to make.

With thanks,

[REDACTED]

Clerk & Responsible Financial Officer
Great Boughton Council

Visit: www.greatboughtonparishcouncil.gov.uk

Office: 01244 637277

Mobile: [REDACTED]

[REDACTED]

From: [Clerk to HUQ-PC](#)
To: [Peak Cluster CCS Pipeline](#)
Subject: Re: EN0710001 - Peak Cluster CCS Pipeline - EIA Scoping Consultation and Notification
Date: 13 January 2026 16:24:03
Attachments: [image001.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)

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Thank you for your email. Hartington Upper Quarter Parish Council has no comment it wishes to make.


Clerk, Hartington Upper Quarter Parish Council

On 13/01/2026 13:06 GMT Peak Cluster CCS Pipeline
<peakclusterccs@planninginspectorate.gov.uk> wrote:

Dear Sir/Madam

FAO: Parish Clerk

Please see attached correspondence on the proposed Peak Cluster CCS Pipeline.

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 February 2026**. The deadline is a statutory requirement that cannot be extended.

Further information is included within the attached letter.

Kind regards





██████████ | Environmental Advisor

The Planning Inspectorate



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DPC:76616c646f72



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From: [REDACTED]
To: [Peak Cluster CCS Pipeline](#)
Cc: [REDACTED]
Subject: Peak Cluster Scoping Consultation
Date: 10 February 2026 16:23:03
Attachments: [image001.png](#)

You don't often get email from [REDACTED]@highpeak.gov.uk. [Learn why this is important](#)

Thank you for the opportunity to comment on the scoping stage.

We would offer the following comments from our Arboricultural Officer

[REDACTED]@[highpeak.gov.uk](#).

The Arboricultural elements/constraint are components of a number of current sections within the EIA scoping report. However, aside from general references there is no (as far as can be ascertained) any specific reference to Arboricultural impacts within the report. Arboricultural impacts are likely to be one of the most visible along the route of the pipeline and potentially at the site of capture facilities, AGI's and BVS, both negatively in terms of loss/damage and positively in terms of mitigative planting. The routing of the pipeline may be impacted by the requirement to avoid such high value features as veteran trees.

Ancient woodland is specifically noted (p126-130) and hedgerow surveys are noted at p146. Tree Preservation orders and hedgerow regulations are noted at p159.

In order for the Arboricultural impacts to be understood and for mitigatory measures to be proposed and assessed, it will be necessary to carry out tree surveys to the relevant British Standard. This is currently BS5837-2012. It is noted that the scoping corridor (for the pipeline) will be further refined down to a 100m wide boundary. The 100m corridor allows contractor to make minor routing adjustments to 'minimise disruption of ecological features such as trees..' This is welcomed and the timing of surveys would presumably align with the reduction of the provisional corridor to the lower width to avoid abortive work.

3.2.81 Trenchless construction used for SSI, Ancient woodland etc is noted and welcomed as a mitigatory measure.

It is accepted that the LVIA will inform iterative design processes in terms of siting etc and this may have an impact on siting of infrastructure. Again, the timing of surveys will need to work alongside the iterative process.

However, the Arboricultural survey process will -in the view of this Council- need to be specifically scoped into the Environmental Impact Assessment, as a stand-alone section, due to the significant impacts that could be occasioned by the proposal and

the similarly significant impacts on several other sections of the report

Yours sincerely

██████████ - Principal Officer (Planning Policy)

High Peak Borough Council & Staffordshire Moorlands District Council

Telephone: ██████████

Email: ██████████@highpeak.gov.uk

LocalPlan@highpeak.gov.uk

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Conservation Team Advice

Date: 30/01/2025

Application Ref: CON/2026/0006

Site Address: Peak Cluster CCS Pipeline

Proposal: Application by Peak Cluster Limited (the applicant) for an Order granting Development Consent for the Peak Cluster CCS Pipeline (the proposed development)

Conservation Advice

Within the High Peak boundary (excluding the Peak District National Park), the proposed development would involve a pipeline running the northwest to southeast through the borough, terminating at the Tarmac and Buxton Lime Capture Facility located northeast of Buxton.

The consultation request has provided two key documents – Environmental Impact Assessment Report Volume 1 and Environmental Impact Assessment Report Volume 2. Each of these volumes has key sections or sub-documents relating to the historic environment, notably:

- Chapter 10 ‘Historic Environment’ of Environmental Impact Assessment Report Volume 1 (pg.263-279)
- EIA Scoping Report – Appendix B: Supporting Figures in Environmental Impact Assessment Report Volume 2
- EIA Scoping Report Appendix G: List of Representative Viewpoints in Environmental Impact Assessment Report Volume 2
- EIA Scoping Report – Appendix H: Historic Environment Baseline Tables in Environmental Impact Assessment Report Volume 2

Environmental Impact Assessment Report Volume 1

Volume 1 - Chapter 10 ‘Historic Environment’ discusses the proposed scope of study area of both above-ground and below-ground works associated with the proposed development. Chapter 10 also includes potential mitigation measure for the historic environment.

As identified in the report, the above-ground and below-ground works associated with the proposed development have the potential to affect the setting and special interest of a number of designated and non-designated heritage assets at all stages of development (construction, operation and de-commission).

Par.10.3.5 of the report outlines that the study area for designated heritage assets is 1km for below-ground works and 5km for above-ground components (which are listed in Appendix H). The report then goes on to state that the study area to be taken forward for Environment Impact Assessment (EIA) will be:

- 500 m from the draft Order Limits (once established) in relation to the below ground components of the Proposed Development;
- 2 km from the draft Order Limits in relation to above ground components of the Proposed Development; and
- Wider up to 5 km from the draft Order Limits (once established) in relation to above ground components of the Proposed Development for heritage assets of particular sensitivity to change.

Par.10.1.4 of the report outlines that non-designated heritage assets (NDHAs) will be considered and presented within the Preliminary Environmental Information Report (PEIR). Section 10.1 does not set any parameters for the study area of NDHAs. 10-5 (Scope of Proposed Development Surveys) indicates that the study areas defined in section 10.3 would be applied to designated and non-designated heritage assets. However, NDHAs are not mentioned in section 10.3.

It is noted that the mitigation options for the historic environment will be developed during the impact assessment process, and Historic England and the relevant local planning authorities will be consulted on the possible mitigation measures/environmental management plans.

From a conservation perspective, we raise no objections to the parameters for the EIA in regard to designated heritage assets but suggest clarification is provided for the study area of non-designated heritage assets.

Environment Impact Assessment Report Volume 2

As noted above, Volume 2 of the EIA report covers the potential designated heritage assets and receptors which may be affected by the proposed development. the following figures were identified as relevant to the historic environment:

Document description	Figure Ref
The Scoping Boundary	Figure 1.2B
Key Environmental Constraints	Figure 1.4B
Key Components of Proposed Development	Figure 3.3
Designations	Figure 7.2
Capture Facilities and Coastal AGI Zone of Theoretical	Figure 7.4a

Visibility - Bare Earth	
Tarmac and Buxton Lime (Turnstead) Capture Facilities Cone of theoretical Visibility – Bare Earth	Figure 7.4c
Tarmac and Buxton Lime (Turnstead) Capture Facilities Zone of Theoretical Visibility – Screened	Figure 7.5c
Tarmac and Buxton Lime (Turnstead) Capture Facilities – Representative Viewpoints	Figure 7.6b
Proposed Traffic and Movement Study Area – Tarmac and Buxton Lime (Turnstead) Capture Facilities Likely Construction Routes	Figure 8.1
Designated Heritage Assets	Figure 10.1B
High Level Assessment of Sensitive Receptors	Figure 10.2B

In addition to the above, a list of all the designated heritage assets which have been identified in the study area is provided in ‘*Appendix H – Historic Environment Baseline Tables*’, which provides a useful baseline of information in relation to designated heritage assets. However, Appendix H does not include details of non-designated heritage assets within the Historic Environment Baseline.

Conservation Officer: [REDACTED]

High Peak Borough Council

The Planning Inspectorate
By email

Your ref: EN0710001

Date: 10 February 2025

Dear Sir / Madam

Peak Cluster CCS Pipeline Environmental Impact Assessment Scoping Report

Thank you for your email and letter of 13 January requesting our comments on the Peak Cluster CCS Pipeline EIA Scoping report prepared by ARUP and AECOM for Peak Cluster Ltd.

The role of Historic England

As you may be aware, Historic England is the Government's advisor on all aspects of the historic environment in England. Historic England's general powers under section 33 of the National Heritage Act 1983 were extended (via the National Heritage Act 2002) to modify our functions to include securing the preservation of monuments in, on, or under the seabed within the seaward limits of the UK Territorial Sea adjacent to England. We also provide our advice in recognition of the English marine plan areas (inshore and offshore), as defined by the Marine and Coastal Access Act 2009 and the objectives and policies of published Marine Plans.

Comments

In summary, we concur with the overall conclusion of the above referenced report that the historic environment, as relevant to the construction, operational and decommissioning phases of this proposed development will be scoped into the Environmental Impact Assessment. We do, however, have the following detailed comments:

Para 10.1.4 The data search for non-designated heritage assets should include the National Record of the Historic Environment held by Historic England, as well as the relevant local authority Historic Environment Records, the Peak District National Park Authority Historic Buildings, Sites and Monuments Record and records held by the National Trust.

'Defining the Study Area' We consider that the study areas proposed are appropriate. We welcome the proposal to review these study areas following consultation and examination of

the Zone of Theoretical Visibility. It is important that a bespoke approach is taken for the assessment of each individual capture facility's (and other infrastructure) impact on the setting of heritage assets to ensure that local topography and longer distance views from sensitive receptors within the Peak District, which may lie beyond their 5km study area, is considered.

Table 10-5 'Trial Trenching Evaluation' is listed as taking place 'Post-DCO'. In order to produce a robust assessment, it is highly likely that archaeological evaluation by trial trenching will need to be undertaken to inform the EIA, especially given the unreliability of geophysical survey within large parts of the scoping boundary. Whilst the potential difficulties are appreciated, trial trenching has been successfully undertaken on other NSIP projects at the pre-determination stage, such as the Morgan and Morecambe Offshore Windfarm Transmission Assets project.

Table 10-6 Grade II listed buildings and Grade II Registered Parks and Gardens are designated as such due to their national significance and should be placed within the 'High' value category (i.e. they have 'demonstrable national importance').

Where the proposed development passes through the Jodrell Bank WHS buffer zone, an assessment of impacts based on the WHS' Outstanding Universal Value will need to be undertaken in accordance with the latest UNESCO guidance. That guidance will need adding to table 10-4 and para 10.7.5.

10.7.17 The study areas here should reflect those presented in the 'Defining the Study Area' section (i.e. 1km, 2km and 5km) and include reference to the review following consultation and the production of the ZTV.

10.8.1 As referenced above, Grade II listed buildings and Grade II Registered Parks and Gardens are 'nationally important assets' and should be included here.

The assessment will need to consider in more detail the non-designated heritage assets of national significance, for both physical impacts and setting. We can highlight in particular:

- The monastic precinct / lands of Dieu-la-Cres Abbey, north of Leek. The pipeline corridor avoids the monument itself but encompasses the precinct.
- The lead mining landscape around Peak Forest, Bradwell, Castleton and Hope. There are a number of scheduled monuments within this area, which the Scoping Report identifies, however these sit alongside extensive areas of non-designated post medieval (and earlier) lead mining rakes, mines, spoil heaps, shafts and other above and below ground features. Often these are directly associated with the remains or mine complex which are protected within the scheduled area. They form part of their landscape, historic and archaeological settings and can be of demonstrably equivalent significance.

- miscellaneous other mining remains and industrial landscapes the pipeline corridor passes through (such as the coal mining landscape west of Bridgmont) and any potential routes of early tramways / plateways systems.
- Prehistoric potential within dry river valleys (cave systems etc) – this is an issue we are currently dealing with on the east side of Caudon Quarry.
- Roman Camps to the east of Chester. Whilst only the Roman camps are scheduled, the areas between them may contain archaeological remains associated with these camps that may be of potential national significance.

In addition to the capture facilities and other above ground infrastructure (including new grid connections), the settings assessment must also consider proposals for landscaping, drainage areas, biodiversity enhancements, construction compounds, temporary access and environmental mitigation (including any landscape change as a result of BNG offsetting etc.)

Opportunities for beneficial impacts on sites or monuments near to the proposed development should be explored (e.g. conservation works / interpretation / landscaping etc).

Comments from the Historic England Regional Science Advisors

Our principal comment concerns the need to ensure that geoarchaeological work is undertaken and appropriately phased so that it can inform the selection of suitable geophysical survey techniques. As noted below, it is essential that the choice of geophysical methods reflects the varied landscapes and environmental conditions that the proposed development will traverse. Undertaking appropriate geoarchaeological work first will enable this.

Geoarchaeology and Geophysical survey

Part of the proposed development lies within a geologically complex area of the Cheshire Plains, characterised by deep glacial, alluvial, and peat deposits. In such conditions, standard geophysical survey techniques (such as magnetometry) frequently fail to detect archaeological features. The proposed development may also traverse areas of moorland containing peat and similar deposits in both Staffordshire and Derbyshire, which are again not necessarily conducive to conventional geophysical approaches.

For these reasons we emphasise the importance of undertaking a thorough and detailed geoarchaeological desk-based assessment (DBA) at the earliest opportunity. This, along with further geoarchaeological ground investigations, will support the development of an initial deposit model, which can be refined as further data becomes available during the works.

Geoarchaeological investigations and borehole surveys will be of paramount importance in areas where geophysics does not always produce results, and the geoarchaeological reports will aid in the selection of further survey types (including alternative forms of intrusive evaluation, such as is discussed below with regards to lithics).

Please refer to Historic England's guidance on geoarchaeological investigations and deposit modelling:

<https://historicengland.org.uk/images-books/publications/geoarchaeology-earth-sciences-to-understand-archaeological-record/>

<https://historicengland.org.uk/images-books/publications/deposit-modelling-and-archaeology/>

Para 10.4.3 When developing the baseline, consideration should be given to deposits with palaeoenvironmental potential, such as peat. Peat can be of high archaeological and palaeoenvironmental value, providing conditions that preserve organic remains, retaining evidence of past landscape and environmental change. Historic England's *Peatlands and the Historic Environment* (2024) guidance offers useful advice for understanding the cultural and heritage significance of peat deposits:

<https://historicengland.org.uk/images-books/publications/peatlands-and-historic-environment/>

Para 10.6 Recognition should also be placed on the indirect impacts to designated and non-designated heritage assets. These can include, but are not limited to, changes in hydrology as a result of the construction works.

Table 10-5 outlines the proposed development surveys, including a Historic Environment DBA, heritage walkover survey, AP/LiDAR data, geophysical survey, and trial trench evaluation. We consider the current range of surveys to be relatively narrow. It should be expanded to include the geoarchaeological surveys noted above, AP and LiDAR surveys incorporating the capture of new data where gaps are identified, and a broader suite of evaluation techniques beyond trial trenching alone. This is particularly important where desk-based research indicates the potential for remains, such as lithic scatters, battlefields, or aircraft crash sites, that may not be effectively assessed using traditional field evaluation methods. Historic England guidance such as that on *Managing Lithic Sites* can help in developing this:

<https://historicengland.org.uk/images-books/publications/managing-lithic-sites/>

Relevant research frameworks, such as the West Midlands, East Midlands, and North-West Regional Research Framework, should be consulted as part of the DBA process. The DBA should also begin to identify which framework research questions the scheme may be able to

address. Research frame works can be accessed at the following [URL:https://researchframeworks.org/](https://researchframeworks.org/)

Table 10-8, Table 10-9 Permanent physical impacts can occur at decommissioning stage, for example through additional excavation to remove pipes, cables etc., machinery driving over earthworks.

Table 10-9 We disagree with the decision to scope out “Physical impacts to known below ground archaeological remains” and “Physical impacts to as yet unknown belowground archaeological remains” during operation. Any anthropogenic changes to the water environment may have a detrimental effect on the preservation of archaeological deposits within water sensitive heritage assets, whether in peatlands or in sites where archaeological remains rely on anoxic, waterlogged conditions for survival. These impacts can be ongoing and do not stop with the end of a scheme’s construction phase.

Any ground works will need to consider the discovery of human remains and Treasure (see links below).

Links

[Treasure Act \(1996\)](#)

[Treasure \(Designation\)\(Amendment\) Order 2023](#)

[Burial Act 1857](#)

11 Water Environment

Chapter 11 sets out how the scheme may impact the water environment and the potential likely significant effects on receptors. We were disappointed that there was no recognition that alterations to the water environment can have an impact on the preservation of archaeological remains which rely on water for preservation. Historic England’s guidance on the preservation of archaeological remains provides clear direction on how such considerations should be incorporated. Appendix 3, which covers Water Environment Assessment Techniques, may be particularly relevant in this context:

<https://historicengland.org.uk/images-books/publications/preserving-archaeological-remains/>

Yours faithfully



Development Advice Team Leader

CEMHD Policy - Land Use Planning,
NSIP Consultations,
Building 1.2,
Redgrave Court,
Merton Road,
Bootle, Merseyside
L20 7HS.

HSE email: NSIP.applications@hse.gov.uk

Email: PeakClusterCCS@planninginspectorate.gov.uk

Dear [REDACTED]

Date: 2 February 2026

**PROPOSED PEAK CLUSTER CCS PIPELINE (the project)
PROPOSAL BY PEAK CLUSTER LIMITED (the applicant)
INFRASTRUCTURE PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 2017 (as
amended) REGULATIONS 10 and 11**

Thank you for your letter of 13 January 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

Will the proposed development fall within any of HSE's consultation distances?

According to HSE's records, the proposed Peak Cluster CCS Pipeline project components as specified in the *Peak Cluster, Environmental Impact Assessment – Scoping Report Volume 1, Document Reference: DOC-W05-014-Final, January 2026, Figures 1.2, drawing title ‘The Scoping Boundary’ Rev 02, dated 27/11/2025*, do appear to cross the Consultation Zones of several Major Accident Hazard (MAH) sites and MAH pipelines. Please see the list attached in Appendix 1 a (MAH sites) & 1b (MAH pipelines).

The Applicant should make contact with the operators of MAH sites (see Appendix 1a), to inform an assessment of whether or not the proposed development is vulnerable to a possible major accident.

Since the works will entail underground pipework, HSE strongly recommends that at the earliest opportunity, the applicant liaises with the pipeline operators (see Appendix 1 b). There are three particular reasons for this:

- i) the pipeline operator may have a legal interest in developments in the vicinity of the pipeline. This may restrict developments within a certain proximity of the pipeline.
 - ii) the standards to which the pipeline is designed and operated may restrict major traffic routes within a certain proximity of the pipeline. Consequently, there may be a need for the operator to modify the pipeline or its operation, if the development proceeds.
 - iii) to establish the necessary measures required to alter/upgrade the pipeline to appropriate standards.
- HSE's Land Use Planning advice would be dependent on the location of areas where people may be present. When we are consulted by the Applicant with further information under Section 42 of the Planning Act 2008, we can provide full advice.

Hazardous Substance Consent

It is not clear whether the Applicant has considered the hazard classification of any chemicals that are proposed to be present at the development. Hazard classification is relevant to the potential for accidents. For example, hazardous substances planning consent is required to store or use any of the Categories of Substances or Named Hazardous Substances set out in Schedule 1 of The Planning (Hazardous Substances) Regulations 2015 as amended, if those hazardous substances will be present on, over or under the land at or above the controlled quantities. There is an addition rule in the Schedule for below-threshold substances. If hazardous substances planning consent is required, please consult HSE on the application.

Consideration of risk assessments

Regulation 5(4) of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 requires the assessment of significant effects to include, where relevant, the expected significant effects arising from the proposed development's vulnerability to major accidents. HSE's role on NSIPs is summarised in the following Advice Note 11 Annex on the Planning Inspectorate's website - [Annex G – The Health and Safety Executive](#). This document includes consideration of risk assessments on page 3.

Explosives sites

Explosives Inspectorate has no comment to make on 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 sincerely

[Redacted Signature]

[Redacted Signature]

CEMHD4 NSIP Consultation Team

Appendix 1

a. Major Accident Hazard sites:

	HSE Reference	MAH site Operator	MAH site Address
1	H0855	Exolum Pipeline System Ltd.	Backford North PSD, Caughall Lane, Backford, Chester, CH2 4BW.
2	H1205	Barker & Briscoe Ltd.	North Wirral Brickworks, Carr Lane, Moreton, Merseyside, CH46 5NB.
3	H4347	British Salt Ltd.	Cledford Lane, Middlewich, Cheshire, CW10 0JP.
4	H4608	Keuper Gas Storage Limited.	Land off King Street at Drakelow Farm, Lach Dennis, Northwich, CW9 7SF.
5	H4813	Geocycle UK Ltd.	Geocycle UK Ltd, Yelsway Lane, Stoke-on-Trent, Staffordshire, ST10 3EQ.

b. Major Accident Hazard pipelines:

	HSE Reference	Transco Reference	Pipeline Operator	Pipeline
1	12463	2708	National Gas	25 Feeder Birch Heath / Mickle Trafford
2	6726	1011	Cadent Gas Ltd	Holmes Chapel / Macclesfield
3	6744	1029	Cadent Gas Ltd	Wilmslow Supply
4	6759	1043	National Gas	4 Feeder Ecclestone / Weston Point
5	6974	1246	Cadent Gas Ltd	Ellesmere Port / Woodchurch
6	7607	-----	RWE nPower plc	Shotwick To Cheshire OCGT Natural Gas Pipeline
7	7618	1870	Cadent Gas Ltd	Chester / Ellesmere Port (VN101)
8	7622	1874	Cadent Gas Ltd	Holmes Chapel / Macclesfield (VN106)
9	7630	1881	National Gas	21 Feeder Mickle Trafford / Deeside
10	7631	1882	National Gas	21 Feeder Elworth / Mickle Trafford
11	7632	1883	National Gas	4 Feeder Audley / Plumley
12	7633	1884	National Gas	21 Feeder Pickmere / Audley
13	8402	2680	National Gas	25 Feeder Bridge Farm / Birch Heath

From: [Majors Planning](#)
To: [Peak Cluster CCS Pipeline](#)
Subject: RE: EN0710001 - Peak Cluster CCS Pipeline - EIA Scoping Consultation and Notification
Date: 15 January 2026 09:41:47
Attachments: [image001.jpg](#)
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[image011.png](#)
[image012.png](#)
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Dear [REDACTED],

I write further to your below email issued to Kirklees Council / LPA.

I can confirm that we have no comment to make.

Yours sincerely,

[REDACTED]

Team Leader – Development Management (Major Developments)

Planning and Development Service
Place Directorate
PO Box 1720, Huddersfield, HD1 9EL

[REDACTED]

Website: www.kirklees.gov.uk



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From: Peak Cluster CCS Pipeline <PeakClusterCCS@planninginspectorate.gov.uk>
Sent: 13 January 2026 15:18
Subject: EN0710001 - Peak Cluster CCS Pipeline - EIA Scoping Consultation and Notification

CAUTION: External email. Do not click links or open attachments unless you recognize the sender and know

the content is safe.

Dear Sir/Madam

FAO: Head of Planning

Please see attached correspondence on the proposed Peak Cluster CCS Pipeline.

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 February 2026**. The deadline is a statutory requirement that cannot be extended.

Further information is included within the attached letter.

Kind regards



 | Environmental Advisor
The Planning Inspectorate



@PINSgov



The Planning Inspectorate



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Peak Cluster CCS Case Team
Environmental Services
Infrastructure Decisions and Applications Service
Planning Inspectorate
c/o QUADIENT
69 Buckingham Avenue
Slough
SL1 4PN

Planning Inspectorate
Reference: EN0710001
Our reference:
DCO/2026/00002

PeakClusterCCS@planninginspectorate.gov.uk

[By email only]

06 February 2026

Dear Sir/Madam,

Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) – Regulations 10 and 11

MMO scoping consultation response on the application by Peak Cluster Limited (the “Applicant”) for an Order granting Development Consent for Peak Cluster Carbon Capture and Storage (“CCS”) Pipeline (the “Proposed Development”)

Thank you for your scoping consultation dated 13 January 2026 and for providing the Marine Management Organisation (the “MMO”) with the opportunity to share our comments with you on the Peak Cluster CCS Pipeline Scoping Report.

The MMO’s role in Nationally Significant Infrastructure Projects

The MMO was established by the Marine and Coastal Access Act 2009 (the “2009 Act”) to make a contribution to sustainable development in the marine area and to promote clean, healthy, safe, productive and biologically diverse oceans and seas.

The responsibilities of the MMO include the licensing of construction works, deposits and removals in English inshore and offshore waters and for Welsh and Northern Ireland offshore waters by way of a marine licence¹. Inshore waters include any area which is submerged at mean high water spring (“MHWS”) tide. They also include the waters of every estuary, river or channel where the tide flows at MHWS tide. Waters in areas which are closed permanently

¹ Under Part 4 of the 2009 Act



or intermittently by a lock or other artificial means against the regular action of the tide are included, where seawater flows into or out from the area.

In the case of Nationally Significant Infrastructure Projects (“NSIPs”), the 2008 Act enables Development Consent Order’s (“DCO”) for projects which affect the marine environment to include provisions which deem marine licences².

As a prescribed consultee under the 2008 Act, the MMO advises developers during pre-application on those aspects of a project that may have an impact on the marine area or those who use it. In addition to considering the impacts of any construction, deposit or removal within the marine area, this also includes assessing any risks to human health, other legitimate uses of the sea and any potential impacts on the marine environment from terrestrial works.

Where a marine licence is deemed within a DCO, the MMO is the delivery body responsible for post-consent monitoring, variation, enforcement and revocation of provisions relating to the marine environment. As such, the MMO has a keen interest in ensuring that provisions drafted in a deemed marine licence (“dML”) enable the MMO to fulfil these obligations.

Further information on licensable activities can be found on the MMO’s website³. Further information on the interaction between the Planning Inspectorate and the MMO can be found in our joint advice note⁴.

The Project: Peak Cluster CCS Pipeline

The Project comprises a new high pressure pipeline network, that will convey carbon dioxide from new build carbon capture facilities, at existing lime and cement manufacturing sites in Derbyshire and Staffordshire, to a coastal network exchange point and compressor station for onward transport to suitable geological carbon dioxide storage under the east Irish Sea. The onshore capture and transportation system comprises four carbon capture facilities, the Peak Cluster pipeline and required Above Ground Installations (AGI), a Coastal AGI and further pipeline(s) traveling from the Coastal AGI to mean low water springs (MLWS).

MMO Comments on the Peak Cluster CCS Pipeline Scoping Report

1. General comments

- 1.1. The MMO has powers under the Infrastructure Planning (Fees) Regulations 2010 (as amended) to charge for its services in relation to any advice, information or other assistance (including a response to a consultation) provided in connection with:
- an application or proposed application, for an order granting development consent, and
 - an application/proposed application to make a change to, or revoke, such an order, and

² Section 149A of the 2008 Act

³ <https://www.gov.uk/planning-development/marine-licences>

⁴ <https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/2013/04/Advice-note-11-Annex-B-MMO.pdf>

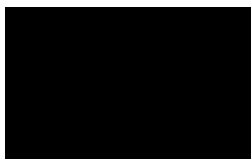


- any other prescribed matter relating to NSIPs, including both statutory and non-statutory work.

- 1.2. The MMO wishes to highlight that reviewing the EIA Scoping Report is therefore considered chargeable work, which requires the Applicant to accept a fee estimate prior to the MMO undertaking any work.
- 1.3. The Applicant first engaged with the MMO on 08 January 2026, following which the MMO issued a fee estimate on 27 January 2026, however, it has not yet been accepted. Therefore, the MMO has been unable to complete a review and consult with our technical advisors at Centre of Environment, Fisheries and Aquaculture Science (CEFAS) on the scoping report. This means that we are unable to provide any comments for this consultation deadline.
- 1.4. The MMO notes, however, that once the fee estimate has been accepted, we can engage with the project and provide comments at a later date.

If you require any further information, please do not hesitate to contact me using the details provided below.

Yours Sincerely,



Marine Licensing Case Officer

D [REDACTED]
E [REDACTED]@marinemanagement.org.uk



Marine
Management
Organisation

...ambitious for our
seas and coasts



From: [Marton Parish Clerk](#)
To: [Peak Cluster CCS Pipeline](#)
Subject: Concerns raised by residents - Marton Parish Council
Date: 27 January 2026 16:28:19

You don't often get email from marton.clerk@gmail.com. [Learn why this is important](#)

Good evening,

Thank you for the information sent out about the Peak Cluster pipeline.

Residents have raised concerns about pipelines potentially leaking and the environmental impact that this could have.

The Parish Council would be most appreciative if any information on this matter could be passed on so that this could be circulated to residents.

Thanks,



Clerk to Marton Parish Council

From: clerk@mostonparishcouncil.gov.uk
To: [Peak Cluster CCS Pipeline](#)
Cc: [REDACTED]
Subject: Moston Parish Council Comments on Peak Cluster CCS Pipeline - EIA Scoping Consultation and Notification
Date: 06 February 2026 18:30:03
Importance: High

You don't often get email from clerk@mostonparishcouncil.gov.uk. [Learn why this is important](#)

For the attention of [REDACTED]

Dear [REDACTED]

Thank you for your letter dated 13th January 2026, Reference EN0710001 Peak Cluster consultation route.

Please find below, comments from Moston Parish Council which refer to the interactive map, Section 6 Cranage to Tarporley which has 2 potential routes, 1 north of Middlewich which does not have any impact on Moston and a more southerly potential route which would pass through Moston and is problematic due to the explanations below.

This proposed route would enter Moston by having to cross under the A533, Booth Lane and the adjacent Trent and Mersey Canal between Bridge Farm and The Middlewich Eastern Bypass, construction of which is to commence in Spring 2026.

This route in post code CW100HH runs close to Tetton Lane to the North and West until it reaches Tetton Hall Cottages and then shows 2 alternative routes North and South until West of Occlestone Green, where it reverts back to a single proposed route joining the proposed North of Middlewich Route.

Land to the north west of Bridge Farm adjacent to Tetton Lane, although not identified on the Cheshire East Local Plan (which is being updated), has been identified as land for future residential development.

- **Subsidence Hollows**

Tetton Lane itself suffers subsidence as a result of random brine pumping which was prevalent in the area. There are numerous subsidence hollows along Tetton Lane between Tetton Hall and Booth Lane. Cheshire Brine Subsidence Compensation Board would require input before any form of construction took place in this area as Land Movements continue to occur.

This link shows the afore mentioned subsidence hollows
[British Geological Survey \(BGS\) | large image viewer | IIPMooViewer 2.0](#)

- **Interference with a Public Right of Way.**

Moston Footpath 4 is a well used public right of way and identified on the Cheshire East Definitive Map. The footpath runs from Tetton Lane, close to Rose Cottage into a field directly through the potential route, until it reaches the double bends on Warmingham Lane, Moston.

Please see [Public Map Viewer - Cheshire East](#)

- **Concerns over close proximity to Horseshoe Farm Gypsy Site**

This proposed route crosses Warmingham Lane between Home Farm and Horseshoe

Farm, a gap of just 30 metres. [REDACTED] with full planning as a Residential Site and also a Transit Site. It is home both permanent and temporary to a number of families with children. Their safety needs to be seriously considered.

In conclusion, Moston Parish Council considers this route to have too many negative aspects and not viable for the intended purpose.

Yours faithfully

[REDACTED]
for and on behalf of Moston Parish Council

[REDACTED]
Parish Clerk and Responsible Financial Officer
Moston Parish Council

Thank you for your email. [REDACTED]
[REDACTED]

Submitted via email to: PeakClusterCCS@planninginspectorate.gov.uk

Date: 10th February 2026

Dear Sir/Madam,

Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) – Regulations 10 and 11

Application by Peak Cluster Limited (the Applicant) for an Order granting Development Consent for the Peak Cluster CCS Pipeline (the Proposed Development)

I refer to your letter dated 13th January 2026 regarding the above proposed DCO. This is a response on behalf of National Gas Transmission PLC (NGT). Having reviewed the scoping consultation documents, NGT wishes to make the following comments regarding gas infrastructure which may be affected by proposals.

NGT has many feeder mains located within or in proximity to the Order limits. Details of this infrastructure is as follows:

- Feeder Main – FM21 – Mickle Trafford to Deeside PS
- Feeder Main – FM04 – Ecclestone to Weston Point
- Feeder Main – FM25 – Bridge Farm to Mickle Trafford
- Feeder Main – FM21 – Elworth to Mickle Trafford
- Feeder Main – FM21 – Warburton to Audley
- Feeder Main – FM04 – Audley to Warburton
- NGT Freehold – CH588024
- NGT Freehold – CH529892
- Cathodic Protection Groundbeds/TR
- Ancillary apparatus

Please note that NGT has existing rights for these pipelines which provides rights for ongoing access and prevents the erection of permanent / temporary buildings / structures, change to existing ground levels or storage of materials etc within the easement strip.

Where the Promoter intends to acquire land, extinguish rights, or interfere with any of NGT's apparatus, NGT will require appropriate protection and further discussion on the impact to its

apparatus and rights including adequate Protective Provisions. A Deed of Consent will also be required for any works proposed within the easement strip.

General Pipeline Information

NGT requires its pipelines remain accessible during and after completion of any works. Some work types have specific restrictions when being undertaken in the vicinity of gas assets, therefore, early consultation with NGT is essential.

General information Promoters should be aware of is contained in *UKOPA GPG/042 - Guidance on the Issues to be Considered by Promoters, Designers and Planners of New Developments in the Vicinity of High Pressure Pipelines* [Good Practice Guide](#).

Our pipelines are normally buried to a depth cover of 1.1 metres, however actual depth and position must be confirmed on site by trial hole investigation under the supervision of an NGT representative. Ground cover above our pipelines should not be reduced or increased. Further guidance around working safely may be sought from NGT and additional specifications provided where required.

Any works within the vicinity of NGT's pipelines must adhere to the safe working requirements set out in [T/SP/SSW/22](#).

If any excavations are planned within a pipeline's easement, or within 10 metres (whichever is higher), or within 10 metres of an Above Ground Installation (AGI), or if any embankment or dredging works are proposed, then the actual position and depth of the pipeline must be established on site in the presence of a NGT representative. A safe working method must be agreed prior to any work taking place to minimise the risk of damage and ensure the final depth of cover does not affect the integrity of the pipeline.

Any large installations which may result in a population increase in the vicinity of a high pressure gas pipeline must comply with the HSE's Land Use Planning (LUP) methodology, and the HSE response should be submitted to NGT for review. NGT will typically support the HSE's advice, however, the HSE's LUP methodology differs from IGEM risk assessment methodology and as such, the pipeline operating conditions / specifications and the formation of a population cluster and / or increased population density near the pipeline as a result of development, may provide sufficient reasons on safety grounds for NGT to request that the Promoter / Developer conducts a risk assessment in form of a Quantitative Risk Assessment (QRA). The QRA must be completed by a specialist company approved to carry out these assessments for NGT.

Pipelines and Buried Services

There is specific criteria that must be adhered to for developing electrical infrastructure near NGT's pipelines to avoid unacceptable levels of interference.

Utility crossings over NGT's pipelines are restricted and require formal written permission in the form of a Deed of Consent before any installation / construction within the pipeline easement is permitted.

The Promoter is to engage with NGT for further guidance in the early stages of design to ensure the required integrity assessments are agreed, and consideration has been given to electrical interference, security, crossing points, future access and safe construction methods, all of which must be mutually agreed prior to undertaking any works on site.

Pipelines must cross NGT's pipeline as close to perpendicular as possible to limit the risk of interference. A new pipeline must not be laid parallel within NGT's easement strip. The separation distance for a pipeline is 1000mm. However, trenchless installation techniques may increase the required separation to be further.

Lead Development Liaison Officer
[REDACTED]@nationalgrid.com
[REDACTED]

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:
PeakClusterCCS@planninginspectorate.gov.uk

10 February 2026

Dear Sir/Madam

RE: APPLICATION BY Peak Cluster Limited (THE APPLICANT) FOR AN ORDER GRANTING DEVELOPMENT CONSENT FOR THE Development Consent for the Peak Cluster CCS Pipeline (THE PROPOSED DEVELOPMENT)

SCOPING CONSULTATION RESPONSE

We refer to your letter dated 13 January 2026 in relation to the above proposed application. This is a response on behalf of National Grid Electricity Transmission PLC (NGET).

Having reviewed the scoping report, I would like to make the following comments regarding NGET existing or future infrastructure in close proximity to the current red line boundary.

NGET has high voltage electricity substations and overhead transmission lines within close proximity the scoping area. The overhead lines form an essential part of the electricity transmission network in England and Wales.

Existing Infrastructure

Overhead Lines

4ZL ROUTE 400 kV OHL	BIRKENHEAD - CAPENHURST 1 BIRKENHEAD - CAPENHURST 2
4ZE ROUTE 400kV OHL	CAPENHURST - FRODSHAM 1 CAPENHURST - FRODSHAM 2
YYS ROUTE 132kV OHL	CAPENHURST - INCE 1 CAPENHURST - INCE 2
ZO ROUTE 400kV OHL	DAINES - DEESIDE 1 DAINES - DEESIDE 2
ZE ROUTE 400kV OHL	CELLARHEAD – DAINES CELLARHEAD – MACCLESFIELD CELLARHEAD - DAINES

ZEA ROUTE 400kV OHL
YV ROUTE 400kV OHL

DAINES - MACCLESFIELD
CELLARHEAD - MACCLESFIELD
DAINES – MACCLESFIELD
BREDBURY - MACCLESFIELD
MACCLESFIELD - STALYBRIDGE - STOCKSBRIDGE

Underground Cables

FLINTSHIRE BRIDGE - HUNTERSTON HVDC (400)
Cable fibres

We enclose a plan showing the location of NGET's apparatus in the scoping area.

In addition, GIS shapefiles of approximate locations of our national electricity transmission network are freely available from here: <https://www.nationalgrid.com/electricity-transmission/network-and-infrastructure/network-route-maps>. You can also check if your works will affect our transmission network by using the Line search website: <https://lsbud.co.uk/>.

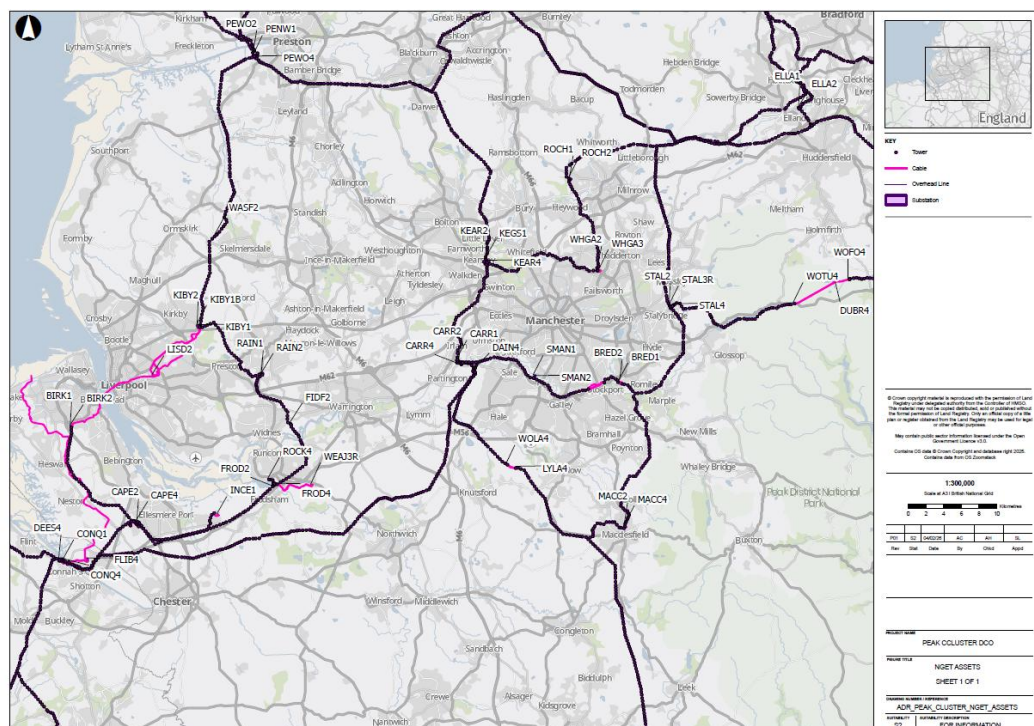


Figure 1: NGET Assets in proposed development area

New infrastructure

The National Energy System Operator (NESO) took over the electricity network planning responsibility from National Grid Electricity System Operator Limited (NGESO) on the 1st October 2024. Please consult with NESO separately from NGET where further information on the strategic need or capacity is sought.

Please refer to the Holistic Network Design (HND) and the NESO website to view the strategic vision for the UK's ever growing electricity transmission network: <https://www.neso.energy/publications/beyond-2030/holistic-network-design-offshore-wind>; and <https://www.neso.energy/publications/beyond-2030>

It should be noted that there may be further interactions with new strategic infrastructure where the projects are in their early development.

NGET requests that all existing and future assets are given due consideration given their criticality to the high-voltage transmission of electricity across the UK. We remain committed to working with the promoter in a proactive manner, enabling both parties to deliver successful projects wherever reasonably possible. As

such we encourage that ongoing discussion and consultation between both parties is maintained on interactions with existing or future assets, land interests, connections or consents and any other NGET interests which have the potential to be impacted prior to submission of the Proposed DCO.

The Great Grid Upgrade is the largest overhaul of the electricity grid in generations, we are in the middle of a transformation, with the energy we use increasingly coming from cleaner greener sources. Our infrastructure projects across England and Wales are helping to connect more renewable energy to homes and businesses. To find out more about our current projects please refer to our network and infrastructure webpage. <https://www.nationalgrid.com/electricity-transmission/network-and-infrastructure/infrastructure-projects>. Where it has been identified that your project interacts with or is in close proximity to one of NGET's infrastructure projects, we would welcome further discussion at the earliest opportunity.

These projects are all essential to increase the overall network capability to connect the numerous new offshore wind farms that are being developed, and transport new clean green energy to the homes and businesses where it is needed.

The following points should be taken into consideration.

Specific Comments – Electricity Infrastructure:

- NGET's Overhead Line/s is protected by a Deed of Easement/Wayleave Agreement which provides full right of access to retain, maintain, repair and inspect our asset
- Statutory electrical safety clearances must be maintained at all times. Any proposed buildings must not be closer than 5.3m to the lowest conductor. NGET recommends that no permanent structures are built directly beneath overhead lines. These distances are set out in EN 43 – 8 Technical Specification for "overhead line clearances Issue 5 (2019)".
- If any changes in ground levels are proposed either beneath or in close proximity to our existing overhead lines, then this would serve to reduce the safety clearances for such overhead lines. Safe clearances for existing overhead lines must be maintained in all circumstances.
- The relevant guidance in relation to working safely near to existing overhead lines is contained within the Health and Safety Executive's (www.hse.gov.uk) Guidance Note GS 6 "Avoidance of Danger from Overhead Electric Lines" and all relevant site staff should make sure that they are both aware of and understand this guidance.
- Plant, machinery, equipment, buildings or scaffolding should not encroach within 5.3 metres of any of our high voltage conductors. When those conductors are under their worst conditions of maximum "sag" and "swing" and overhead line profile (maximum "sag" and "swing") drawings should be obtained using the contact details above.
- If a landscaping scheme is proposed as part of the proposal, we request that only slow and low growing species of trees and shrubs are planted beneath and adjacent to the existing overhead line to reduce the risk of growth to a height which compromises statutory safety clearances.
- Drilling or excavation works should not be undertaken if they have the potential to disturb or adversely affect the foundations or "pillars of support" of any existing tower. These foundations always extend beyond the base area of the existing tower and foundation ("pillar of support") drawings can be obtained using the contact details above.
- NGET high voltage underground cables are protected by a Deed of Grant; Easement; Wayleave Agreement or the provisions of the New Roads and Street Works Act. These provisions provide NGET full right of access to retain, maintain, repair and inspect our assets. Hence, we require that no permanent / temporary structures are to be built over our cables or within the easement strip. Any such proposals should be discussed and agreed with NGET prior to any works taking place.
- Ground levels above our cables must not be altered in any way. Any alterations to the depth of our cables will subsequently alter the rating of the circuit and can compromise the reliability, efficiency

and safety of our electricity network and requires consultation with National Grid prior to any such changes in both level and construction being implemented.

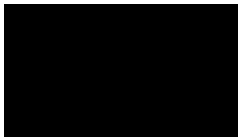
Further Advice

NGET requests to be consulted at the earliest stages to ensure that the most appropriate protective provisions are included within the DCO application to safeguard the integrity of our apparatus and to remove the requirement for objection. All consultations should be sent to the following email address: box.landandacquisitions@nationalgrid.com

We hope the above information is useful. If you require any further information, please do not hesitate to contact the Land Development Liaison team. In the meantime, we look forward to receipt of further information and consultation relating to potential impacts on our assets.

The information in this letter is provided notwithstanding any discussions taking place in relation to connections with electricity customer services.

Yours faithfully,



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



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

Technical Guidance Note 287

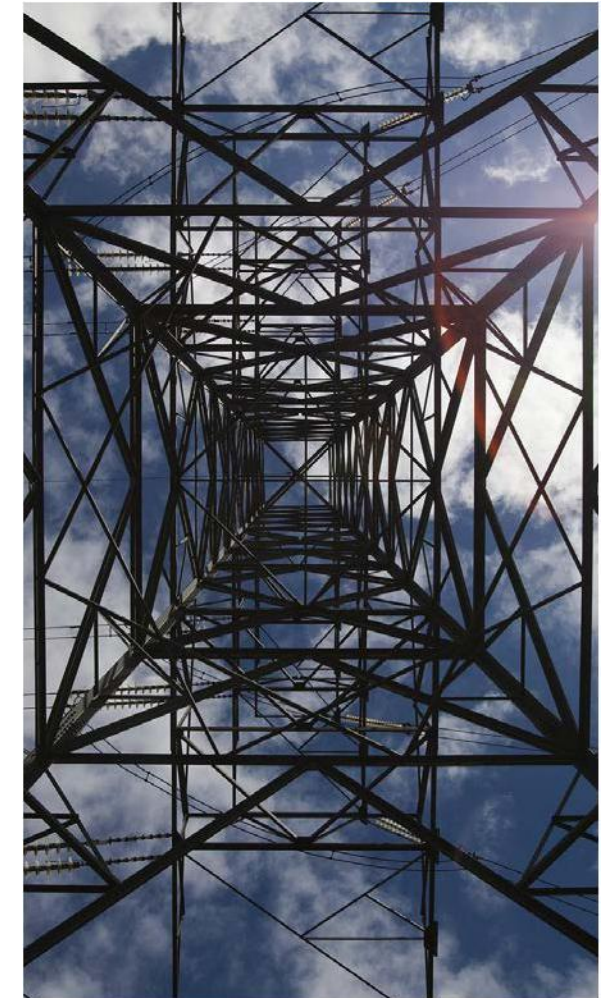
Third-party guidance for working near National Grid Electricity Transmission equipment

nationalgrid





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Disclaimer

National Grid Gas Transmission and National Grid Electricity Transmission or their agents, servants or contractors do not accept any liability for any losses arising under or in connection with this information. This limit on liability applies to all and any claims in contract, tort (including negligence), misrepresentation (excluding fraudulent misrepresentation), breach of statutory duty or otherwise. This limit on liability does not exclude or restrict liability where prohibited by the law, nor does it supersede the express terms of any related agreements.



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.

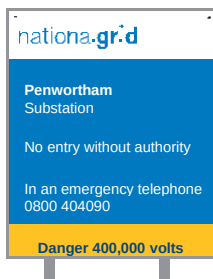
The scope of the report covers information on basic safety and the location of our assets – and also highlights key issues around particular types of development and risk areas.

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.

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.

400kV

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





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

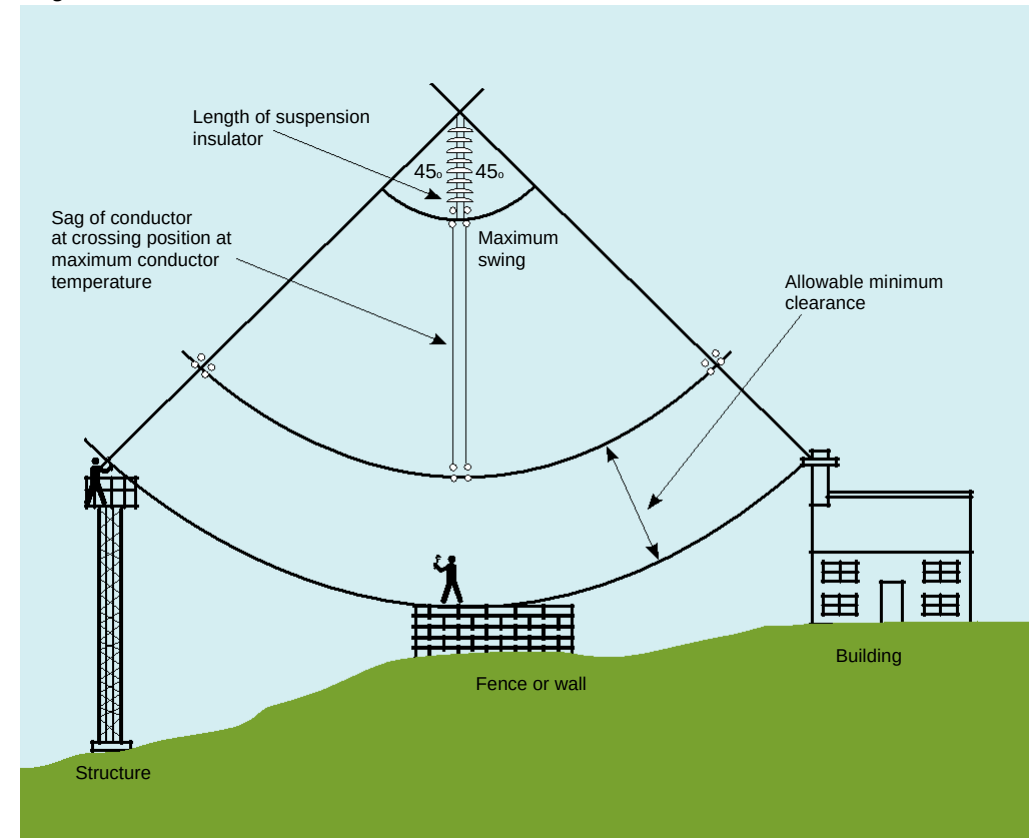
The clearance distances referred to in this section are specific to 400kV overhead lines. National Grid can advise on the distances required around different voltages i.e. 132kV and 275kV.

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

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The undergrounding of electricity cables at Ross-on-Wye

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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 laid 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 separation 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.

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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.

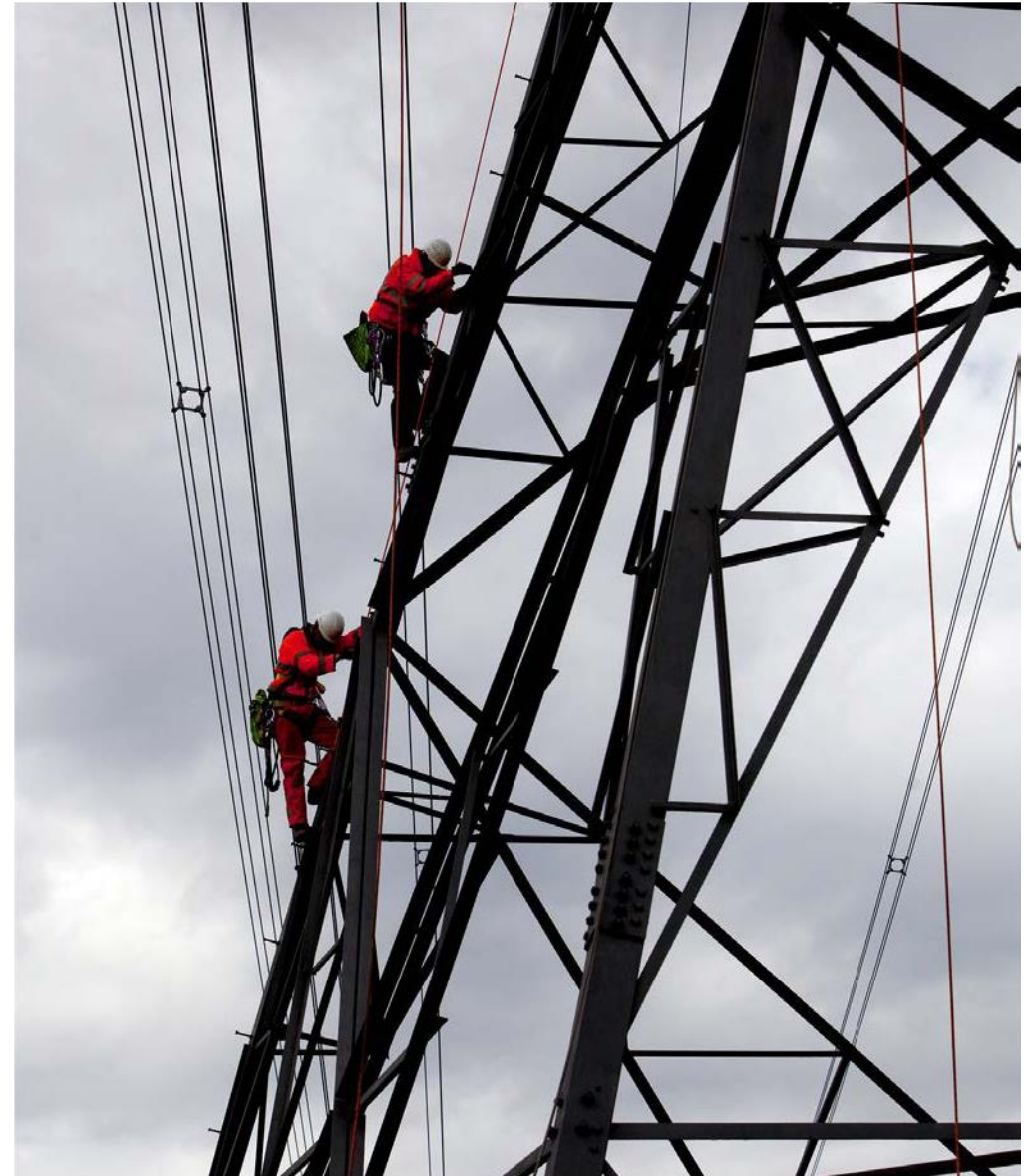
Maintenance access

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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previous page

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.

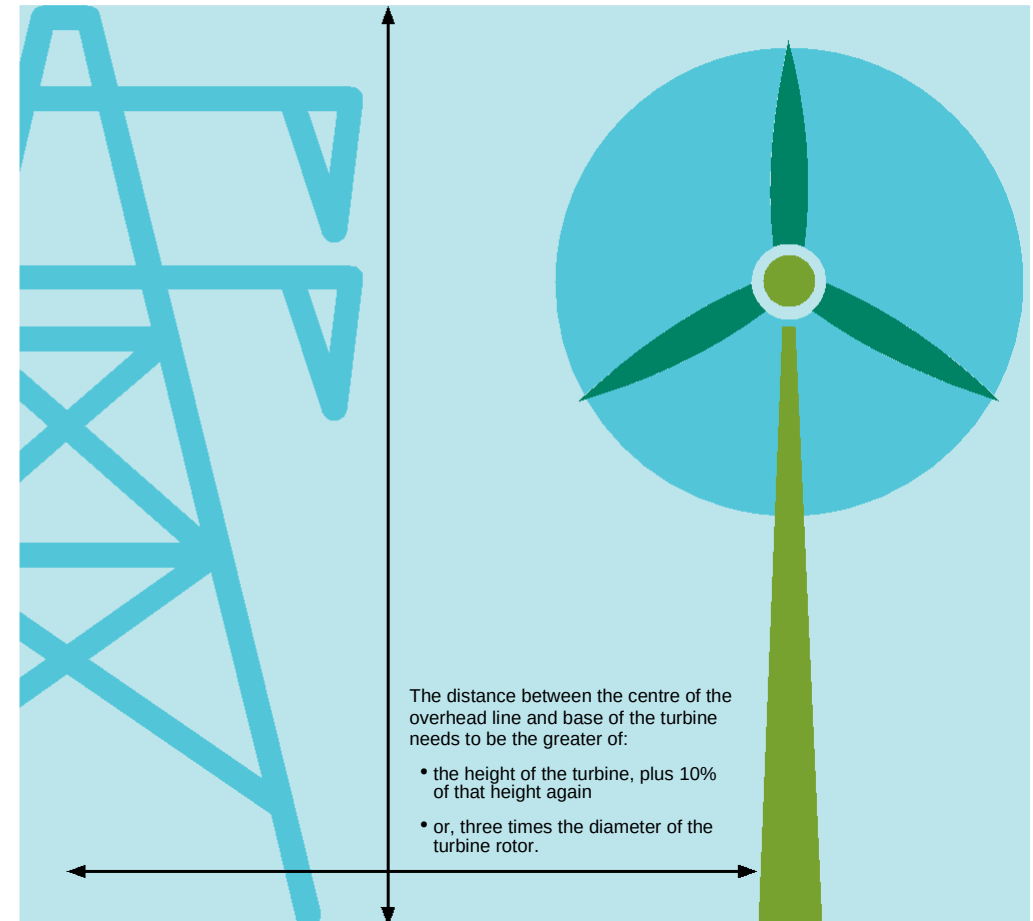
Commercial and housing developments

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.

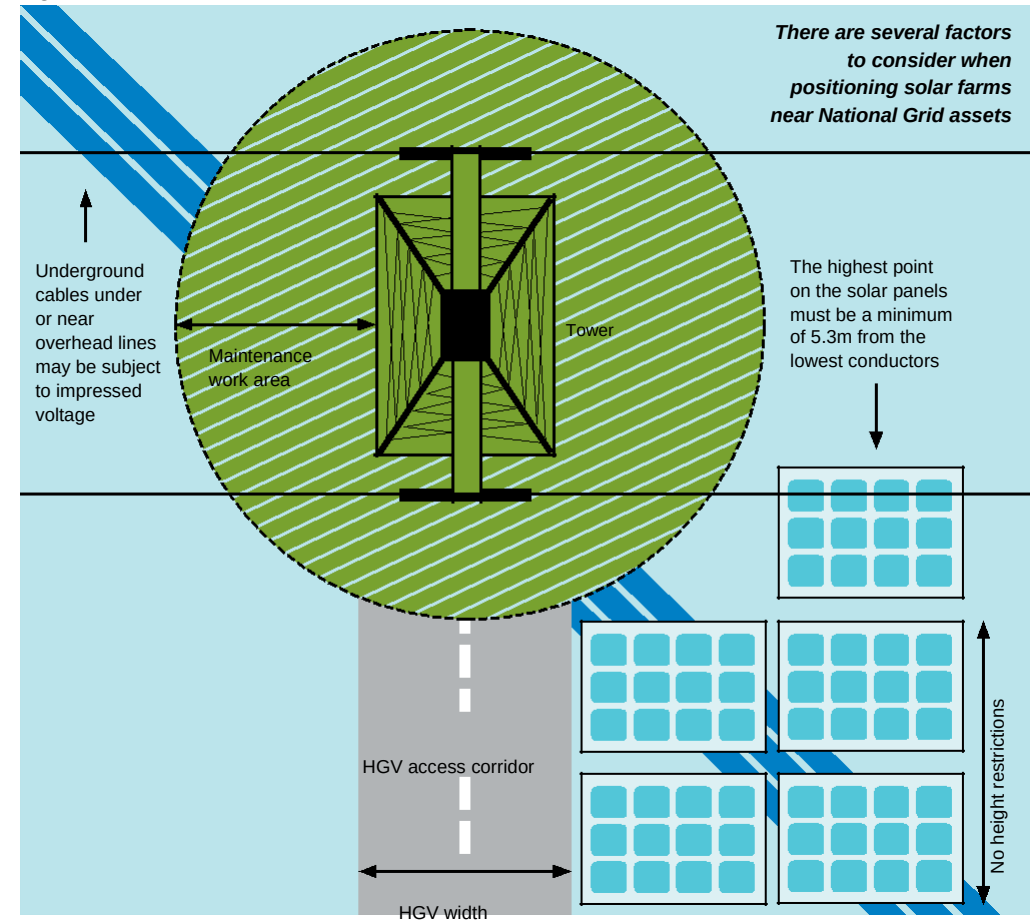
Solar panels that are directly underneath power lines risk being damaged on the rare occasion that a conductor or fitting falls to the ground. A more likely risk is ice falling from conductors or towers in winter and damaging solar panels.

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,

Diagram not to scale



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.



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

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(2) Vertical Axis indicates meters above OS GB Datum 2m distance between minor marks/box

**X & Y Co-ordinate of tower base.
Route & Tower Number
Tower Type**

Span Length (m)

Height of Conductor Attachment Point Above OS GB

Bottom Conductor Displayed at Max Sag

5.3m Clearance line at Max Orange dashed line

7.3m Clearance line at Max Sag Blue dashed line

Lidar Data showing Buildings, Roads, Vegetation etc.

North Arrow

OHL Plan View & Downward Looking Imagery

5.3m Clearance line at Max Swing Orange dashed line

**Section Operating Voltage,
Conductor Type, Conductor Name,
Bundle Configuration & Sagging Condition**

(1) Vertical & Horizontal Scale – can be used in conjunction with a ruler to take measurements.

IMPORTANT: NOTE HORIZONTAL & VERTICAL SCALES DISTANCE (1) MAY DIFFER FROM HORIZONTAL & VERTICAL GRID MARKS SCALE/BOX DISTANCE (2).

Generic Data Origin of Drawing

Key for LIDAR Data

ENA43-8 Clearance to Objects at 400kV

Swing & Sag Diagram

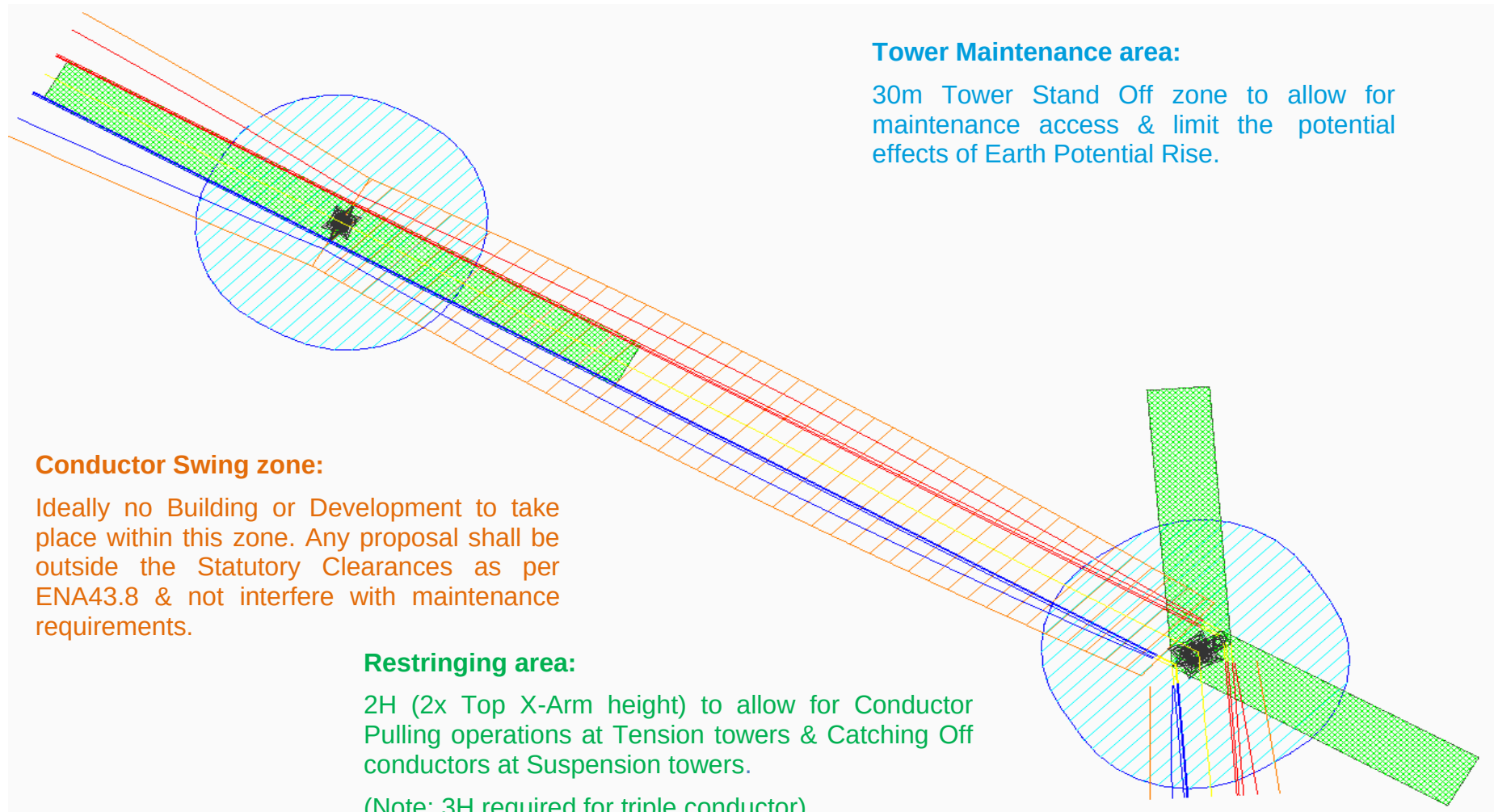
NG Drawing Specific Data

SECTION	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P	Q	R	S	T	U	V	W	X	Y	Z	AA	AB	AC	AD	AE	AF	AG	AH	AI	AJ	AK	AL	AM	AN	AO	AP	AQ	AR	AS	AT	AU	AV	AW	AX	AY	AZ	BA	BB	BC	BD	BE	BF	BG	BH	BI	BJ	BK	BL	BM	BN	BO	BP	BQ	BR	BS	BT	BU	BV	BW	BX	BY	BZ	CA	CB	CC	CD	CE	CF	CG	CH	CI	CJ	CK	CL	CM	CN	CO	CP	CQ	CR	CS	CT	CU	CV	CW	CX	CY	CZ	DA	DB	DC	DD	DE	DF	DG	DH	DI	DJ	DK	DL	DM	DN	DO	DP	DQ	DR	DS	DT	DU	DV	DW	DX	DY	DZ	EA	EB	EC	ED	EE	EF	EG	EH	EI	EJ	EK	EL	EM	EN	EO	EP	EQ	ER	ES	ET	EU	EV	EW	EX	EY	EZ	FA	FB	FC	FD	FE	FF	FG	FH	FI	FJ	FK	FL	FM	FN	FO	FP	FQ	FR	FS	FT	FU	FV	FW	FX	FY	FZ	GA	GB	GC	GD	GE	GF	GG	GH	GI	GJ	GK	GL	GM	GN	GO	GP	GQ	GR	GS	GT	GU	GV	GW	GX	GY	GZ	HA	HB	HC	HD	HE	HF	HG	HH	HI	HJ	HK	HL	HM	HN	HO	HP	HQ	HR	HS	HT	HU	HV	HW	HX	HY	HZ	IA	IB	IC	ID	IE	IF	IG	IH	II	IJ	IK	IL	IM	IN	IO	IP	IQ	IR	IS	IT	IU	IV	IW	IX	IY	IZ	JA	JB	JC	JD	JE	JF	JG	JH	JI	JJ	JK	KL	JM	JN	JO	JP	JQ	JR	JS	JT	JU	JV	JW	JX	JY	JZ	KA	KB	KC	KD	KE	KF	KG	KH	KI	KJ	KK	KL	KM	KN	KO	KP	KQ	KR	KS	KT	KU	KV	KW	KX	KY	KZ	LA	LB	LC	LD	LE	LF	LG	LH	LI	LJ	LK	LL	LM	LN	LO	LP	LQ	LR	LS	LT	LU	LV	LW	LX	LY	LZ	MA	MB	MC	MD	ME	MF	MG	MH	MI	MJ	MK	ML	MM	MN	MO	MP	MQ	MR	MS	MT	MU	MV	MW	MX	MY	MZ	NA	NB	NC	ND	NE	NF	NG	NH	NI	NJ	NK	NL	NM	NN	NO	NP	NQ	NR	NS	NT	NU	NV	NW	NX	NY	NZ	OA	OB	OC	OD	OE	OF	OG	OH	OI	OJ	OK	OL	OM	ON	OO	OP	OQ	OR	OS	OT	OU	OV	OW	OX	OY	OZ	PA	PB	PC	PD	PE	PF	PG	PH	PI	PJ	PK	PL	PM	PN	PO	PP	PQ	PR	PS	PT	PU	PV	PW	PX	PY	PZ	QA	QB	QC	QD	QE	QF	QG	QH	QI	QJ	QK	QL	QM	QN	QO	QP	QQ	QR	QS	QT	QU	QV	QW	QX	QY	QZ	RA	RB	RC	RD	RE	RF	RG	RH	RI	RJ	RK	RL	RM	RN	RO	RP	RQ	RR	RS	RT	RU	RV	RW	RX	RY	RZ	SA	SB	SC	SD	SE	SF

15 APPENDIX B



OHL Tower Stand Off & Reconductoring Area



Date: 10 February 2026
Our ref: 538229
Your ref: EN0710001



The Planning Inspectorate
c/o QUADIENT
69 Buckingham Avenue
Slough
SL1 4PN

Consultations
Hornbeam House
Crewe Business Park
Electra Way
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CW1 6GJ

T 0300 060 900

BY EMAIL ONLY

Dear [REDACTED]

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

Proposal: Peak Cluster CCS Pipeline

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

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

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 full, detailed advice on the scope of the Environmental Impact Assessment (EIA) for the proposed development. This Annex also highlights the issues we consider as higher risk (**Red** or **Amber**) to reflect our level of concern at this stage. These ratings are defined as:

- **Red:** fundamental issues where Natural England disagrees with the approach or position as proposed, with potential lasting and significant adverse effects on the natural environment without substantial new information or change in approach
- **Amber:** issues with the potential to become red issues in the absence of further new information or change in approach

Un-rated items are those where Natural England do not raise fundamental concerns but offer additional advice and recommendations.

Summary of key concerns on proposed Scope

A summary of Natural England's most urgent concerns regarding the scope of the assessment for the Peak Cluster CCS Pipeline is set out below.

General Approach

- **Alternatives** – all alternatives should be fully considered and presented for the proposed development, including options for non-piped transportation methods on land and at sea (ship, rail, road) for connection to an offshore carbon storage site, along with elaboration on the preferred use of the Morecambe Net Zero (MNZ) facility for the Peak Cluster development.
- **Approach to cumulative assessment** – careful and holistic consideration is required of the proposals in relation to other intrinsically related projects, such as the MNZ facility, including how conditions, including any potential mitigation or compensation measures, could be implemented.

Terrestrial elements

- **Air Quality assessment and permitting approach** – appropriate methodology and approach is required including scoping in of operational impacts from capture facilities; a clear approach should also be outlined to the permitting process in relation to the DCO process.
- **Protected landscape** – inclusion of a cumulative landscape assessment is required, along with confirmation on scoping in of temporary and permanent effects of the pipeline on the Peak District National Park (PDNP) and its setting, for all stages of the development.
- **Natterjack Toad species surveys** – surveys for Natterjack Toad are required including as a feature of designated sites and a protected species in its own right, which are currently absent in the Scoping report.
- **Soils, Best & Most Versatile (BMV) land and Peat** – assessment approach should include appropriate methodology for surveying and assessing soils and BMV land, including consideration of impacts on peatlands.

Marine and intertidal elements

- **Offshore infrastructure connection** – substantial further information is required on the feasibility and implications of trenchless methods (eg Horizontal Directional Drilling (HDD)), including details on exit pit locations, pipeline protection, use of cofferdams, timing of works, and scale of working corridors.

Natural England has engaged with the Applicant via our Discretionary Advice Service (DAS) to provide early advice in relation to this project. We are keen for this engagement to continue throughout the pre-application process on the key topics highlighted in this response.

For any further advice on this consultation please contact us via consultations@naturalengland.org.uk.

Yours sincerely

East Midlands Area Delivery Team – Natural England

Annex A – Natural England’s Advice on EIA Scoping

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1 General Advice

1.1 General Principles of the EIA

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 provided¹.
- 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

Through our discussions with the developer and the information provided in the Scoping report, Natural England are confident that the above general principles have been or are going to be addressed within the ES.

¹ National Infrastructure Planning [Advice Note Seven, Environmental Impact Assessment, Process, Preliminary Environmental Information and Environmental Statements](#) (see Insert 2 – information to be provided with a scoping request)

1.2 Environmental Data

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>.

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

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.

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.

You should also consider where applicable our advice on the environmental considerations and use of data and evidence to support offshore wind and cable projects in English waters – see: [Environmental considerations for offshore wind and cable projects - Home \(sharepoint.com\)](#). This includes Natural England and Joint Nature Conservation Committee (JNCC)'s shared advice on 'Nature conservation considerations and environmental best practice for subsea cables in English inshore and UK offshore waters'. The outputs of Natural England's project 'Offshore Wind Marine Environmental Assessments: Best Practice Advice for Evidence and Data Standards' are also provided.

2 Natural England's Advice on the Terrestrial Scope of the EIA

2.1 Designated Sites

2.1.1 Table 1: Designated Sites (terrestrial)

Reference	Comment	Recommendation	Key Issues (Amber/Red)
Tables 6-10, 6-11, 6-12 – Scoping Summary	Designated sites have been scoped into the ES assessment for all elements of the proposal, which is welcomed. No reference is made to Passage birds or Natterjack Toad in these tables, which will need to be assessed within the ES as features of designated sites and/or protected species in their own right.	The ES should include a full assessment of the direct and indirect effects of the development on the qualifying/notified features of the relevant designations and identify appropriate measures to avoid, minimise or reduce any adverse effects. This includes marine sites, where relevant. It should be noted that Natural England's comments on the scope of the Marine Assessment are held separately in Section 3 of this response.	
Internationally Designated Sites			
Section 6.3 – Identification of Internationally Designated Sites	Section 6.3 of the scoping report sets out the use of a 15km study area for internationally designated sites, extending this to 30km from sites with mobile qualifying features such as birds & bats. Natural England notes that section 6.10 does not include reference to the wider 30km search area, however, we are content that all relevant sites have been identified for inclusion in the assessment at section 6.10.3. Scoping Report Tables 6-4, 6-5, 6-6 and 6-7 indicate the sites within the relevant search area from each element of the development, which is welcomed. Natural England is content that the	Due to the scale of the proposals, and the number of designated sites potentially affected, Natural England advises that the ES and HRA must be clear in their consideration of impacts to each designation, from each element of the development. Natural England has made additional comments regarding cumulative effects later in this response (See comments under 'cumulative assessment' at Page 14).	

	relevant terrestrial sites have been identified for each element of the development.		
Section 6.10 - HRA	Natural England welcomes the Applicant's intention to include a Habitats Regulations Assessment with the ES submission.	Use of an evidence plan may be beneficial for this project, to ensure all relevant information is gathered to inform the assessment, with which Natural England is keen to engage.	
Tables 6-4, 6-5, 6-6, 6-7 – Designated Site Features	NE notes that for multiple sites, numerous features are missing or incorrect in the 'reason for designation' column in tables 6-4 to 6-7. This is relevant to both internationally and nationally designated sites.	Natural England advises that Designated Sites Viewer is used to ensure all relevant features are included for assessment. Useful conservation advice for each site can also be found at this site, including useful information to inform the assessment of 'assemblage' features, where relevant (e.g. here for the Mersey Estuary SPA).	Amber
Nationally Designated Sites – Sites of Special Scientific Interest			
Section 6.3 – Study Area	Section 6.3 of the scoping report sets out the use of a 5km study area for nationally designated sites. In particular, it is noted that the underpinning SSSIs of standing water designations have not been identified: e.g. West Midlands Mosses SAC comprises four individual SSSI sites: - Clarepool Moss - Abbots Moss - Chartley Moss - Wybunbury Moss Midland Meres & Mosses – Phase 1 & 2 Ramsar Sites are also underpinned by a number of individual SSSIs.	The study area should be widened to a known range where mobile species are a feature of designated sites. This should be consistent for SSSI features as well as internationally designated features which are mobile. Where internationally designated sites have been scoped into assessment, the underpinning SSSIs should also be considered. Where an absence of impacts is apparent, i.e. where a site is not hydrologically linked and has no mobile features, further assessment may not be necessary, but this should be noted in the ES.	Amber
Table 6-7 –	Natural England notes a number of SSSI sites	These sites should be considered within the ES, or	Amber

Identification of Nationally Designated Sites	have not been identified within Table 6-7: - Alderley Edge SSSI - Mersey Narrows SSSI - Lindow Common SSSI - Thorncliffe Moor SSSI Similarly, the following site has not been identified in Table 6-5: - Combes Valley SSSI	justification provided for their omission.	
Table 6-7 – Identification of Nationally Designated Sites & Table 5-9 – Air Quality	Several Geological SSSIs have been identified within the Air Quality Chapter as ecological receptors. For example Cauldon Railway Cutting SSSI and Caldon Low SSSI.	Relevant Geological SSSIs should be identified and assessed within the ES. It may be appropriate for this assessment to be made in the Geology and Ground Conditions Chapter, with cross-reference being made to this within the Biodiversity Chapter. In particular, it is noted that Cauldon Railway Cutting SSSI falls within the Red Line Boundary at the Holcim Facility. Any impacts to the geological interest of this SSSI must be assessed within the ES.	Amber
Chapter 13 – Table 13-8 – Baseline Information	Natural England notes Sandbach Flashes SSSI has not been included within the Geology and Ground Conditions Chapter as a sensitive receptor. Reference is particularly made to Moston Flash (SSSI Unit 1) which is adjacent to the pipeline.	This unit is a geological notified feature which is part of the SSSI and has hydrological links to biological features of other SSSIs. LiDAR data suggests subsidence in this area appears to be increasing so Natural England recommends the stability of this area needs further investigation through the development process.	Amber
Section 6.3 – Baseline Information	Tables 6-4, 6-5, 6-6 and 6-7 indicate the sites within the relevant search area from each element of the development, which is welcome, however, owing to the length of the pipeline, the	NE advises the ES should be clear and consistent in its description and use of route sections. Consideration of impacts from each route section, as set out at Figure 4.1, may be beneficial to avoid complication in	Amber

	presentation of baseline information for the pipeline within Table 6-7 is difficult to interpret. When reviewing the document, we encountered some confusion regarding the sections of pipeline that were included in the Pipeline (East) vs the Pipeline (Central), particularly whether the branch of pipeline connecting to the Holcim Facility was included in the Central or east section.	the ES.	
Identification of Potential Effects – All Terrestrial Sites			
Section 6.6 - Identification of Potential Effects	The potential impacts listed at 6.6.1 at each stage of the development (construction, operation and decommissioning) are welcomed at this early stage, along with the impacts listed at paragraph 6.10.4 specifically relating to the HRA, however, these are broad categories of impact and the ES must consider impacts to each relevant designated site in more detail, considering both direct and indirect impacts to habitat and species features.	Impacts should be considered from: - Killing/Injury of designated site qualifying species - Loss/damage to designated site qualifying habitats & Geological features, including habitats which are functionally linked to designated sites (including habitats of ornithological features and other mobile features, namely Lamprey & Natterjack Toad). These may arise from: - o Direct: Development footprint, accidental encroachment during construction - o Indirect: Air Quality (See Table 2), Water Quality (See Table 4), Hydrology (See Table 4), Migration Barriers, Spread of Invasive Non-Native Species (INNS) etc - Disturbance to designated site qualifying species. Including from:	Amber

		○ Noise/Vibration (See Table 3) ○ Light ○ Visual This list is not exhaustive, and Natural England would welcome discussion and agreement with the applicant on all relevant impacts to be considered.	
Section 6.6 - Identification of Potential Effects	Potential impacts to Functionally Linked Land used by bird species have been identified, however, this impact has not been included with regard to any other species.	The ES must also consider impacts to other mobile species via impacts to functionally linked land. Namely, Lamprey spp and Natterjack Toad, which are qualifying features of relevant coastal designations, but are known to use habitats outside the designated areas. For example, Lamprey breeding success can be altered via impacts to migration routes upstream of the designated site.	Amber
Section 6.6 – Identification of Potential Effects	NE has set out further detailed comments on key impact pathways covered in separate ES Chapters in the below tables 2 to 4.	The ES should have clear signposting and cross-referencing where assessments of impacts to designated site features are held in other chapters. This may include Air Quality, Water Environment and Flood Risk, Noise & Vibration, Marine Environment, Geology and Ground Conditions etc. NE advises that all relevant conclusions with regard to impacts to designated sites from these pathways should be summarised in one place, usually within the biodiversity chapter, for ease of understanding.	
Section 6.6 – Identification of Potential Effects	NE welcomes the identification of visual disturbance as a relevant impact at both paragraph 6.6.1 and 6.10.4 in relation to the HRA.	The assessment should also determine whether there is any visual disturbance associated with the construction, operation or decommissioning of the project, e.g. presence of machinery or personnel in view of receptor birds. Visual disturbance combined	

		with increased noise levels can increase risk of disturbance. NatureScot's guidance Disturbance Distances in selected Scottish Bird Species – NatureScot Guidance NatureScot may be helpful in assessing potential effects of human disturbance.	
Planned Surveys			
Sections 6.8.5 & 6.8.6 – Bird Survey	Natural England notes further emphasis should be put on gathering existing data, alongside the proposed project specific bird surveys.	Further consideration should be given to existing data, including: recent applications and local records of bird counts, e.g. local record centres, CWT, Record, Webs Data, other Hynet applications or DCOs in area.	Amber
Sections 6.8.5 & 6.8.6 – Bird Survey	The proposed passage and wintering bird survey durations and timings are not considered adequate. Table 6-13 states that a second year's wintering and passage surveys will be undertaken 'where necessary'.	Due to the project's large development footprint and proximity to designated sites, Natural England advises two years of wintering and passage surveys should be completed to provide a more robust understanding of SPA bird usage on the site and to inform design of suitable mitigation, where relevant.. Natural England would welcome further discussion with the applicant regarding survey scope in due course; survey extent in the second year may also be influenced by the results from results in the first year. NE advises the passage period should include September to April inclusive.	Amber
Sections 6.8.5 & 6.8.6 – Bird Survey	Natural England welcomes the inclusion of Nocturnal surveys at the compressor station locations at Hoylake, however, we advise further Nocturnal survey effort is required.	NE advises nocturnal surveys should include locations at the foreshore at Hoylake, as this area is subject to significant recreational disturbance during the day, so behaviour and use of this area may differ significantly at night-time.	Amber
Sections 6.8.5 & 6.8.6 – Bird Survey	The full extent of breeding bird survey proposed is unclear.	Breeding Common Tern are qualifying features of the Dee Estuary SPA and Mersey Narrows and North Wirral Foreshore SPA. Breeding Little Tern are also a	Amber

		qualifying feature of the Dee Estuary SPA. As such, Natural England advises that breeding surveys should be scoped in within the relevant foraging ranges for breeding Common Tern & Little Tern from these designations. Natural England would welcome further consultation regarding the scope of breeding bird surveys.	
Section 6.8.6 – Bird Survey	No surveys are proposed for other species of importance to the Peak District Moors SPA, South Pennine Moors SPA and underpinning SSSIs. Merlin and Short Eared Owl are both qualifying features of these SPAs. Culew and twite are also named notified features of the South Pennine Moors SSSI, along with the overall assemblage of breeding birds.	Surveys should be tailored to pick up other species from nearby SPAs and underpinning SSSIs. This includes not only golden plover but also species such as merlin, short-eared owl, peregrine, curlew and Twite. In addition, a number of the underpinning SSSI designations include breeding bird ‘assemblage’ features, which should be considered. This is especially important where works involve permanent land loss or works for four or more years (four years represents the average lifespan for golden plover).	Amber
Table 6-13 – Natterjack Toad Survey	No surveys are proposed for Natterjack Toad. This species is a qualifying feature of the Dee Estuary Ramsar, as well as a notified feature of Red Rocks SSSI. Further comment is made in section 2.3 of this response with regard to licencing and the species’ status as a European Protected Species (EPS).	Surveys for Natterjack Toad should be included in suitable habitat within the Wirral to enable an assessment of impacts to be undertaken within the HRA (and for protected species licencing purposes). The population associated with the Dee Estuary Ramsar and Red Rocks SSSI is known to have expanded around the coast; as such, suitable habitat (including along the North Wirral Foreshore) may be functionally linked to these designations.	Red
Mitigation			
Section 6.9 – Mitigation	Natural England welcomes the reference made to the mitigation hierarchy.	Natural England advises that detailed consideration of alternatives must be presented in the ES.	

Hierarchy	The Scoping report briefly discusses the consideration of alternatives and design evolution (Section 3.4), but is limited in detail at this stage. The selection of the two Coastal Above Ground Infrastructure (AGI) options is not referenced in Section 3.4.	Whilst it is welcomed that options are being considered, justification for the selections of the two Coastal AGI locations should be presented.	
Section 6.9 – Mitigation	The use of Horizontal Directional Drilling (HDD) is noted in the site selection discussion (Section 3.4), being a key mitigation measure to avoid impacts to coastal designations. Natural England notes that whilst HDD has advantages over trenchless techniques, there remain significant potential impacts during construction.	The risks associated with HDD and trenchless techniques must be fully assessed in the ES. It should be clearly mapped which sections of pipeline will be installed via HDD and open trench techniques. Further comments on HDD are provided in Sectionn 3 of this response.	Amber
Section 6.9 – Mitigation & Compensation	It is noted that compensatory replacement habitat is referenced at paragraph 6.9.2.	NE urges caution when considering any compensatory habitat creation as mitigation. With regard to Internationally Designated sites, compensation must be considered through the derogations stage of HRA and cannot be considered as mitigation. Similarly, ‘embedded’ mitigation measures may only be considered at the screening stage of HRA where they are part of the design of the development, i.e. are not specifically included to avoid an effect. All mitigation should be designed proportionately, based on a robust assessment of impacts.	Amber
Cumulative Assessment			
Section 6.10 -	Natural England’s primary focus with regard to	The HRA must include assessment of effects in	Amber

HRA	cumulative assessment will be with regard to designated sites and the impacts arising on these from cumulative effects. Section 6.10 does not reference an in-combination assessment.	combination with other plans/projects.	
Chapter 19 – Cumulative Assessment	Natural England welcomes the proposed methodology for cumulative assessment, using the Planning Inspectorate's <i>'Advice on Cumulative Effects Assessment'</i> guidance. The criteria used to develop the long list of developments to be considered (paragraph 19.2.6) are noted, and generally match NE's general advice (see recommendations column).	Natural England's general advice regarding the scope of in-combination assessment is set out below: It is generally well established that the scope of an in-combination assessment is restricted to plans and projects which are 'live' at the same time as the assessment being undertaken. These can potentially include: - The incomplete or non-implemented parts of plans or projects that have already commenced; - Plans or projects given consent or given effect but not yet started. - Plans or projects currently subject to an application for consent or proposed to be given effect; - Projects that are the subject of an outstanding appeal; - Ongoing plans or projects that are the subject of regular review and renewal - Any draft plans being prepared by any public body - Any proposed plans or projects that are reasonably foreseeable and/or published for consultation prior to application	
Chapter 19 – Cumulative Assessment –	It is noted that the search area for projects on the National Infrastructure Planning Programme of Projects has been set at 15km.	NE recommends where potential impacts are identified to designated sites, an appropriate search is made <u>from the designated site boundary</u> , as impacts could	Amber

Search Area		be derived from other projects beyond the identified 15km search area – i.e. air quality effects from a development 16km from the project, but within 10km (the Air Quality impact study area) of the designated site boundary.	
Appendix I – Cumulative Effects Assessment Long List & Figure 19.1A-G	Natural England welcomes the provision of the Cumulative Assessment Long List.	It is noted that no applications have been identified in the Staffordshire County Council area, however, there is a current application at Cauldon quarry to consolidate permissions, extend the area and time of the winning and working of the quarry (SCC/22/0136/FULL-ES Staffordshire County Council). This should be added to the long-list for consideration in cumulative assessment. In addition, none of the other numerous recent applications at Cauldon quarry are included. These should be added to the long-list for consideration in cumulative assessment. Consideration of the Hynet project and associated CCS infrastructure will be important.	Amber

2.1.2 Table 2: Air Quality – Chapter 5

Reference	Comment	Recommendation	Key Issues (Amber/Red)
Section 3.2 – Description of the proposed development – Project Uncertainty	The flexibility required for the design of each of the capture facilities is acknowledged. It is likely that operational emissions (and construction emissions) from each facility will require assessment separately, with different assumptions made/ Rochdale envelope	The approach to assessment will need consideration to ensure a reasonable worst case scenario for all pollutants and all protected sites is undertaken. Several options/ scenarios may require assessment if there is uncertainty.	Amber

	assumptions etc. However, as the development is being assessed as a whole, care will need to be taken as to how in-combination emissions are assessed. We note consideration of very different potential technologies appear to be in-scope at present (e.g. range of CO2 capture technologies at Breedon/ Holcim (3.2.7/ 3.2.56); with connection either to grid or gas powered generation at several sites (3.2.10/ 3.2.30/ 3.2.45), with choice of gas or biomass for the lime kilns at Buxton (3.2.44), and also noting that some of the existing kilns will be replaced (3.2.41) which may have different “worst case” emissions.	Natural England is keen to engage with Applicant on these issues through the pre-application process.	
Section 3.2 – Description of the proposed development - Amines	Paragraph 3.2.7 includes the potential use of amine solvents at the Breedon site.	Emissions from use of amine solvents will need to be included in the Air Quality (AQ) assessment as a potential contributor to nitrogen deposition. NE recommends the use of the Environment Agency’s Guidance on Emerging Techniques for Post-combustion carbon dioxide (CO2) capture (2021). This has been noted as relevant guidance in Table 5-4.	
Section 3.2 – Description of the proposed development – Cumulative Impacts	N/A	It will be important to ensure assessment of impacts from different parts of the project (e.g. the four separate carbon capture facilities) are all taken into account – e.g. traffic impacts from construction activities taking place on the same road network but at different times, or overlapping construction/ operation impacts. Any cumulative effects of uncertain aspects of the project will require assessment. Natural England would welcome discussion and agreement on the	Amber

		cumulative methodology as the project develops, including any emerging plans or projects that should be included.	
Section 3.2 – Description of the proposed development – Novel Technologies	A full list of emissions from different aspects of development, and from different activities - especially where these are novel technologies – e.g. Cryogenic capture within an oxyfuel environment (also eg 3.2.40) will be required. This will include emissions from e.g. condensate from water treatment, and any wastes. Closed circuit systems may be anticipated to have emissions during maintenance/ leaks etc.	Further clarity on technologies will be required during the pre-application period to enable a full list of emissions to be included and an appropriate assessment methodology agreed.	Amber
Table 5-11 – Scoping Summary - Pipeline	Construction vehicle movements have been scoped into the assessment (Table 5-11).	It is accepted that this will be a rolling operation, but construction/ laydown areas may require assessment with longer term construction traffic emissions that will require consideration. Impacts from trenchless techniques to lay the pipeline within the SAC/SPA will also require consideration (construction plant emissions, including stationary plant). Where impacts will be <1yr, it is anticipated that impacts of emissions will be less likely to harm the integrity of sites. However, if within or adjacent to protected sites even short term emission impacts could be relevant. Emissions from construction compounds and stationary plant must be considered in the ES.	
3.2.116 & Table 5-12 – Coastal AGI	As it stands, two options for the coastal AGI are proposed (in this case location rather than technology). It is anticipated that these options	Any cumulative effects of uncertain aspects of the project will require assessment. Natural England would welcome discussion and agreement on the	

	will be refined through the pre-app stages to a preferred option in the ES, and subject to consideration in the final air quality assessment.	cumulative methodology as the project develops, including any emerging plans or projects that should be included.	
Section 3.3 – Rochdale Envelope	The extent of uncertainty and necessity for a Rochdale Envelope/limit of deviation approach is recognised. Identification of the worst case is appropriate, but at present there does not appear to be sufficient clarity as to what the worst case could be in terms of air quality impacts on protected sites given the fact that several options on technology use etc are in scope (also 3.4.21). Maximum operational emission levels may be an appropriate assumption (with identified stack height ranges) but these may have to include maximum emissions from all possible technologies. It is acknowledged that design parameters will evolve and be presented in the Statutory Consultation and eventually the DCO application. Limits of Deviation in the pipeline are appropriate, and should assume, where relevant, that emissions occur at the edges of these closest to the protected site.	Assumptions and parameters for air quality assessment should be discussed with Natural England through the pre-application process.	Amber
Chapter 5 - Table 5.4 – Standards and Guidance	Natural England's recently published Air Quality Standing Advice has not been referenced. It is noted that the EA's guidance on assessing deposition modelling for amines is used, which will be an important part of the deposition assessment if amine solvents are used.	Natural England has produced air quality 'Standard Advice for Air Quality Impacts in Nationally Significant Infrastructure Projects' (See Annex B attached). As this project involves novel technology, Natural England will provide bespoke air quality advice for this proposal (including that within this response), in addition to this standard advice. However, the general principles of the standard advice	

		remain relevant. This has been shared with the applicant during pre-application discussions. Natural England's 'standing advice' on air quality for local authorities contains similar advice and is available online: Air pollution and development: advice for local authorities - GOV.UK.	
Table 5.6 – EALs	The EALs for human health are acceptable to use where there are no environmental/ecological ones set. However, in some cases ecological receptors may be more susceptible to these pollutants than humans. For example: - NEER158 – NEER158 Edition 1 Lethal and sub-lethal impacts of air pollution on terrestrial invertebrates: Literature review – NEER158 and Monchanin et al. (2021) – which identified that As, Cd, Pb and Hg impact invertebrates even at levels below those recommended as 'safe' for humans. Such issues should be considered in the assessment even if ecological thresholds are not set. Similarly, some listed pollutants may have an impact on nitrogen deposition (amines in particular) or acid deposition which must be assessed. Critical levels and critical loads for ecological sites do not appear to have been referenced, and these must be included.	Critical levels and loads for protected sites must be included. Any thresholds in addition to standard critical levels/ loads should be agreed with Natural England.	Amber

Section 5.3 (and 5.4.7)	The use of a 10km study area for ecological receptors is considered appropriate at this stage.	Should modelling indicate impacts could extend beyond this boundary, or the associated road network affect protected sites outside this area, further protected sites may require consideration.	
Table 5.7 – Breedon Capture Facility	The presence of three SSSIs within the site boundary and four more within 1km (as well as 26 other designated sites within 10km) indicates there may be air quality impacts from the Breedon facility, depending on emissions from the facilities themselves and traffic arising. This will require assessment in the ES and HRA (for the Habitats sites).	To be undertaken at next stage of assessment, and any residual impacts discussed with NE.	Amber
Table 5.8 – Tarmac and Buxton lime Capture facilities	The Tarmac and Buxton sites also have several designated sites in close proximity, including the Peak District Dales SAC within 200m. These will require consideration.	To be undertaken at next stage of assessment, and any residual impacts discussed with NE.	Amber
Table 5.9 – Holcim Capture Facility	The Caldon Dales SSSI is within the boundary of Holcim facility, with five further SSSIs within 1km of the site and 16 further protected sites within 10km. These will require consideration.	To be undertaken at next stage of assessment, and any residual impacts discussed with NE.	Amber
Section 5.4.10 – Peak cluster pipeline – East, West and Central (Including AGI's) & Section 5.4.12 - Coastal AGI to MLWS Pipeline(s)	Construction impacts from the pipeline and AGIs (i.e. AQ emissions from traffic, Non-Road Mobile Machinery etc) upon designated sites will require consideration. If there will be no operational emissions, as indicated at tables 5-11 & 5-12 this should be justified in the assessment.	To be undertaken at next stage of assessment, and any residual impacts discussed with NE. Operational pipeline emissions as outlined at 3.2.91 would likely be negligible, however, the use of helicopters is novel & Operational Vehicle Emissions should be kept under review pending the finalised scope of activity required for maintenance.	Amber

Section 5.4.4 - Baseline Environment	The LPAs listed exclude those located in Wales, which still fall within the 10km study area.	Flintshire CC and other relevant Welsh LPAs should be listed and consultation with Natural Resources Wales is recommended with regard to protected sites in Wales.	
Section 5.4.14 – Future Baseline	It is accepted that the future AQ baseline is assumed to be the current baseline. Although it is likely NOx will continue to decline there is no evidence that ammonia will continue to do so.	The proposed approach is acceptable.	
Section 5.5 – Identification of Potential Effects	The identified sources of emissions are appropriate. However, the following sources should also be considered: - Operational traffic - Onsite power generation (construction & operation) – e.g. where generation is required at capture facilities - Waste emissions (from construction & operation) - e.g. any removal of waste solvents etc off site which could cause emissions	The final list of identified sources should be included at the next stage of assessment. Natural England queries whether there are any relevant emissions from other operational activities, including CO2 compression at the Coastal AGI, for example.	Amber
Section 5.6 - Methodology	Paragraph 5.6.3 states that the process will involve ' <i>Comparison of the changes with the defined significance criteria to determine the level of impact</i> '. It is accepted that this approach is used for the EIA, but the key issue in ecological terms is whether there will be undermining of the Conservation Objectives (for Habitats sites) or whether there will be harm to the interest of SSSIs. These should be taken into account during the assessment process when allocating 'sensitivity criteria'.	Methodology to be clarified at next stage of assessment.	Amber
Section 5.6 – Methodology –	Where a protected site is within 200m of a road, construction (and operational) traffic along that	Methodology to be clarified at next stage of assessment.	Amber

Construction Traffic	road should be assessed in combination, to assess whether concentrations or deposition >1% of the relevant critical level or critical load would be generated, as per Natural England's guidance on air quality effects Air pollution and development: advice for local authorities - GOV.UK		
Tables 5-10, 5-11 and 5-12 – Scoping Summary – Decommissioning Impacts	While it is recognised that detailed assessment will be undertaken in the statutory consultation/EIA, it is not considered appropriate to exclude decommissioning impacts from dust or traffic assessment (as demolition activities will generate dust and traffic) – and the SSSIs present within the site boundary/order limits are not considered ' <i>low sensitivity ecological receptors</i> '. Although the extent of impacts and any mitigation required would be scoped in advance of demolition activities, it should also be addressed at this stage to ensure the full life time of the proposal has the potential to be managed without adverse impact on the environment.	Decommissioning impacts from dust and vehicle movements should be scoped in to the assessment.	Amber
Tables 5-10, 5-11 and 5-12 – Scoping Summary – Operational Impacts	Operational activities, including any that are already undertaken, would be required to be included in the assessment as they would form part of the proposed development. For example, the text under dust emissions indicates ' <i>...there would be no change to any operational activities that may generate dust...</i> ' but whether there is change or not, any activities forming part of the proposed development require assessment. This also applies to temporary/ emergency activities during operation for maintenance etc – though it is accepted that the impacts of these would likely	Operational emissions from the proposed development must be assessed in the ES, regardless of existing emissions.	Red

	be negligible.		
Section 5.8 - Mitigation	Consideration of potential mitigation measures are welcome, including use of the CEMP & CTMP – but full assessment of what impacts these will mitigate and how efficient they will be is required. In particular, operational impacts at the capture facilities are currently unknown, so mitigation will need to take this into account. Operation in accordance with set Emission limit Values (ELVs) is considered to be an operational technique rather than mitigation, but any tightening of these ELVs in response to an identified impact could be considered as mitigation.	Mitigation of residual impacts of operational capture facilities in particular will be important, and these should be shared with Natural England following assessment where adverse effects on protected sites cannot be excluded. They will need to be incorporated into the DCO. Impacts prior to mitigation should be considered at the screening stage of the project's HRA, with additional mitigation only considered at the Appropriate Assessment stage.	Amber
Section 5.8 – ELVs and Permitting	It is currently unclear what is the intended approach to permitting alongside the DCO. Where the intention is not to run permitting alongside the DCO process, it would not be appropriate to address ELVs only at the permitting process, as the DCO can only be granted if the Secretary of State is confident that there will not be harm to designated sites, with any mitigation needed to ensure this being required/committed as part of the DCO.	The approach to permitting alongside the DCO should be agreed with Natural England and the Environment Agency as early as possible in the development process.	Red
Appendix I (Provisional Cumulative Effects Assessment Long List) - Table I-1	The long-list at present appears to include relevant projects, though Natural England recommends further consideration is required for the adjacent items.	Cumulative Assessment must include: - Where the proposed development will link into other projects (for example, if connection with the grid is required for power generation at the capture facilities, and this connection is not considered part of the Peak Cluster Project).	Amber

		- Local Plan allocations. - Agricultural developments (that could emit ammonia and therefore impact on nitrogen or acid deposition at the protected sites). It is noted that some of these have been included in the long list (eg anaerobic digestion facility) but the final version should include search terms used.	

2.1.3 Table 3: Noise and Vibration – Chapter 9

Reference	Comment	Recommendation	Key Issues (Amber/Red)
Section 9.4.2 – Ecological Receptors	Paragraph 9.4.2 indicates that ecological receptors for noise effects are considered in Chapter 6. As a result, Chapter 9 does not discuss noise and vibration impacts to ecological receptors.	Identification of ecological receptors for assessment within the Noise and Vibration chapter is key to enable full assessment of impacts to designated sites. It is important to note that important functionally linked land outside designated site boundaries may also need to be considered as a receptor within the assessment.	Amber
Section 9.6 – Assessment Methods	The Assessment of noise effects upon ecological receptors may differ significantly from human receptors & application of the same thresholds is unlikely to be suitable. Further advice has been set out in the recommendation column.	The noise assessment should present the predicted noise at the sensitive receptor and set this in the context of the existing noise environment – i.e. how noise levels will change, including the type of noise such as consistent or sudden loud bangs etc. Factors such as noise ‘peakiness’, including rise time of a noise signal and the frequency content of the noise source, should also be included as these factors may affect behaviour. To understand peak noise levels and the repetition rate of peak noises over a period of time, we suggest L_{Amax} and/or L_{Apeak} levels are assessed, in addition to L_{Aeq}. This will help to understand both average and maximum levels, as each can affect behaviour.	Amber

		If noise levels are predicted to increase significantly (for example, major works in close proximity to areas used by high numbers of SPA birds), noise contour maps should be provided. The location of noise contours matching thresholds of concern can be compared against the mapped distribution of birds. When interpreting noise assessment results, Natural England does not propose specific thresholds for determining when an impact will occur. Factors including the degree of change, sensitivity of certain species, nature of the sound, duration of exposure and extent of area used by designated site features that is affected should all be considered together. Nonetheless, as a general rule of thumb, noise levels below 50bB are unlikely to be significantly disturbing. For predicted noise levels between 50dB and 70dB LAmax, suitable avoidance or mitigation measures should potentially be explored, depending on the above factors. Noise levels above 70dB LAmax are likely to be disturbing, and suitable avoidance or mitigation measures should be explored.	

2.1.4 Table 4: Water Environment – Chapter 11

Reference	Comment	Recommendation	Key Issues (Amber/Red)

Sections 11.3.2 & 11.3.5 – Study Area – Surface Water	A 500m study area has been used to to identify surface water features. The study area is caveated by paragraph 11.3.5, which notes that '<i>consideration of any other downstream water feature attributes will also be made</i>' during subsequent stages of assessment.	Where evidence suggests that hydrogeological effects may extend beyond the identified buffer distance, these areas and receptors should also be considered within the assessment. Natural England generally advises that where there is surface water connectivity to a designated site, impacts via this connection should be considered, regardless of the distance.	
Section 11.3.3 – Study Area – Groundwater	A 1km study area has been used to identify groundwater features. Paragraph 11.3.3 states Where evidence suggests that hydrogeological effects may extend beyond the 1 km buffer, these areas and receptors will also be considered within the assessment.	This 1km default study area is considered appropriate, however it should be acknowledged that the limestone geology of the White Peak is complex, with almost all rainfall conveyed via subsurface pathways, of which the exact pathways are unknown. This is a result of the Karst Limestone geology. In a number of locations, the proposed pipeline passes through areas which drain to Designated sites. Where there is uncertainty regarding groundwater connectivity with a designated site, further investigation and assessment is likely to be required. If Karstic Linkages are identified, the study area may need to be modified.	
Section 11.4 – Baseline Environment	Paragraph 11.4.3 lists key sources of information for the hydrology and flood risk assessment.	Natural England suggests seeking available information on Groundwater studies and modelling for Cheshire, as extensive recent research has been undertaken by the Environment Agency and United Utilities.	
Section 11.4 – Baseline Environment	Key Groundwater Dependent Terrestrial Ecosystems (GWDTEs) have been identified within the study areas for each element of the development. However, several statutory sites that support wet-grasslands, meadows, and standing waters such as mere and mires have not been listed in this chapter.	This approach is accepted and, as noted before, it is advised that the ES should have clear signposting and cross-referencing where assessments of impacts to designated site features are held in other chapters. NE advises that all relevant conclusions with regard to impacts to designated sites should be summarised in one place, usually within the biodiversity chapter, for	

	It is stated in Table 11-5 that <i>'There are also several Protected Areas within a few km of the Study Area. These Protected Areas will be considered as part of the water environment impact assessment where they are hydrologically connected to or potentially influenced by water features within the study area. However, any surface water dependent terrestrial ecosystem sites and habitats that are independent of watercourses will be assessed under 'Biodiversity'.</i>	ease of understanding.	
Section 11.5 – Identification of Potential Effects	Paragraph 11.5.1 identifies <i>'Potential impacts on groundwater from the installation of subsurface infrastructure potentially altering the natural groundwater flow regime, redirecting or impeding flow paths'</i> , which is welcomed.	This is particularly relevant in the Karst limestone of the White Peak, where subsurface flow paths are largely unknown; pipeline installation may require bedrock removal. Changes in the flow regime, or introduction of pollutants, has the potential to damage designated sites fed by groundwater. In addition, as noted in Table 1, LiDAR data has shown increasing subsidence at Sandbach Flashes SSSI; any changes to the hydrology, i.e. diversion of flow from the flashes, has the potential to have significant adverse effects on the SSSI. LiDAR data suggests subsidence in this area appears to be increasing so Natural England recommends that the stability of this area needs further investigation through the development process.	
Sections 11.8.8-10 – Nutrient Neutrality	It has been noted in Tables 11-8, 9 and 10 that Water Quality impacts to the Peak District Dales SAC are possible from the Tarmac Facility, Buxton Lime Facility, and Pipeline East. In	Usually, Nutrient Neutrality advice applies only to development creating additional overnight stays within the catchment, i.e. housing, hotels, etc. as set out in the advice letter sent of LPAs in 2022 ³ . However, for large	Amber

³ [Natural England Water Quality and Nutrient Neutrality Advice \(16 March 2022\) - NE785](#)

	particular, it is noted that Nutrient Neutrality may be required. The Peak District Dales SAC is failing to meet its Conservation Objectives as a result of excessive phosphorous pollution². As a result, all development in the catchment must demonstrate that it will not contribute additional nutrients to the SAC. The Nutrient Neutrality Methodology considers both the wastewater contribution of phosphorous from overnight stays, and the surface water contribution of phosphorous from land use changes.	scale development such as this, where phosphorous impacts from surface water alone may be significant, it may be appropriate to evidence an absence of additional phosphorous input from land use changes via use of the Nutrient Budget Calculator⁴. It is noted that surface water drainage will be installed at the capture facilities; Natural England advises that well designed SuDS are usually able to mitigate water quality impacts from operational surface water discharges. Whilst Nutrient Neutrality focusses on phosphorous, other water quality impacts must be considered too, including sediment, chemicals, fuels/oils etc. This is relevant for operational surface water discharges and pollution events during construction. Natural England would welcome further dialogue with the Applicant with regard to their approach to avoidance of water quality impacts to the Peak District Dales SAC.	
Section 11.6 - Mitigation	Natural England welcomes the intention to use both a CEMP and DEMP to avoid and mitigate pollution events during construction and decommissioning. We also welcome the proposed Drainage Strategy, which will likely play an important role in avoiding operational water quality impacts.	NE welcomes the reference to the CIRIA SuDS Manual to inform the drainage strategy, including use of the simple index approach. Further guidance specific to Phosphorous can be found in CIRIA C808 'Using SuDS to reduce phosphorus in surface water runoff'⁵.	
Tables 11-15 and 11-16	The summary tables indicate that water quality impacts to surface water and ground water (it is	Impacts to groundwater flow regime must also be considered.	Amber

² [Peak District Dales Special Area of Conservation - Evidence Pack - TIN192](#)

⁴ [Peak District Dales SAC: nutrient neutrality calculator - GOV.UK](#)

⁵ https://www.ciria.org/CIRIA/CIRIA/Item_Detail.aspx?iProductCode=C808F&Category=FREEPUBS

	assumed the second row in each of these tables is meant to say 'ground water' not surface water) will be scoped in, but do not identify impacts via changes to the groundwater flow regime, as was previously noted in Section 11.5: ' <i>Potential impacts on groundwater from the installation of subsurface infrastructure potentially altering the natural groundwater flow regime, redirecting or impeding flow paths</i> '.		
Section 11.9 – Planned Surveys	No further survey or monitoring is proposed as part of the assessment.	As noted above, where there is uncertainty regarding groundwater connectivity with a designated site, further investigation and assessment may be required, where ground investigations identify dolines or fissures along the route. This may include Dye tracing or similar. In Table 1 of this response Natural England has noted LiDAR evidence of subsidence at Sandbach Flashes SSSI. Further investigation of the stability of this area may be required to inform any potential impacts of the project to both the geological interest of the SSSI, and the hydrological pathways that feed the site.	Amber

2.2 Nationally Designated Landscapes

2.2.1 Table 5: Landscape – Chapter 7

Reference	Comment	Recommendation	Key Issues (Amber/Red)
Table 7-1, 7-2, 7-3 – Legislation & Policy	Natural England welcomes the legislation, policy and guidance referenced.	Account should also 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.	
Avoidance & Alternatives	Paragraph 7.8.2 states that avoidance of landscape impacts has been considered during optioneering, which is welcomed. However, little further information is provided in this chapter regarding how Designated Landscapes have shaped design decisions.	Given the location of the cement and lime facilities, complete avoidance of the PDNP and its setting are not possible. As such, the ES must show how landscape impacts, in particular impacts on the special qualities of the Peak District National Park (PDNP), have been minimised through site and route selection.	Amber
7.6.5 – Levelling Up and Regeneration Act	Natural England welcomes the reference made to Furthering the Purposes of the PDNP.	The ES must clearly set out how the proposed development contributes to furthering the statutory purposes of the PDNP, under Section 245 (Protected Landscapes) of the Levelling Up and Regeneration Act (LURA) 2023 ('the Duty'). The statutory purposes of the PDNP include: • to conserve and enhance the area's natural beauty, wildlife and cultural heritage; and • to promote opportunities for the public understanding and enjoyment of their special qualities. The Duty underlines the importance of the mitigation hierarchy for firstly avoiding harm to the statutory purposes of the designated landscape and, where this is not possible, in mitigating the effects. Defra guidance also outlines that, under the Duty, relevant authorities (in this case the Secretary of State as decision maker) should as far as reasonably practical 'contribute to the conservation and enhancement of the natural beauty, special qualities, and key characteristics of Protected Landscapes'. Natural England advises that measures to enhance the landscape to further the statutory purposes should be	

		explored at each stage of the mitigation hierarchy, which are additional to any mitigation or compensation for impacts. The ES should set out measures to further the statutory purposes which are proportionate, reasoned and appropriate in line with the PDNP management plan, and apply to both the NP and its setting. Natural England is keen to engage with the Applicant and the PDNP Authority early in the process to explore these measures.	
7.4.5 – PDNP Management Plan	Clear reference to the PDNP’s Management plan and special qualities has been made here and throughout the chapter, which is welcomed.	Management Plans describe the natural beauty, special qualities and key characteristics of, and targets and objectives for, the designation. As such, the PDNP management plan should be used to inform the assessment of effects, design of mitigation and any measures to further the purposes of the landscape.	
7.3 - Study Area	Natural England welcomes the use of Zones of Theoretical Visibility (ZTVs) to define the relevant study area for the Capture Facilities and Coastal facility. However, no ZTVs have been presented at this stage for the AGIs, Block Valve Stations (BVSs) or Pipeline Corridor and it is unclear how their Study Areas have been defined. Nonetheless, the PDNP and its setting have correctly been identified as receptors within the study area for all Capture Facilities, Pipeline (East) and the Northern AGI (see further comment re Summary Table 7-22 which appears to include an error).	ZTVs for the AGIs, BVS and Pipeline should be provided, accompanied by commentary on their interpretation, to evidence the suitability of the defined Study Areas. ZTVs should use 10 metre contours in the modelling, for accuracy appropriate to its purpose.	Amber

	Natural England has no comments on landscape effects beyond those relevant to Nationally Designated Landscapes.		
7.4.90-93 – Representative Viewpoints	Natural England welcomes the early identification of viewpoints (VPs). It is noted that VP selection is subject to further refinement, with preliminary VPs only identified for capture facilities at this early stage. Agreement on VPs with Local Planning Authorities is also welcomed. Natural England has not held a site visit at this stage, so we have limited detailed comments on the proposed VPs at this stage. Some limited comments are set out below.	Natural England urges consultation and agreement of VPs relevant to the assessment of impacts to the PDNP, including sensitive receptors such as National Trails and Public Rights of Way.	Amber
Figure 7.6c - Viewpoints – Capture Facilities	Figure 7.6c illustrates the proposed VPs localised in close proximity to the capture facility at Cauldon. The ZTV shows visibility extending up to and beyond 10km to the North and North West of this facility, when screening has been considered.	It may be appropriate for additional viewpoints to be included further North and North-West, to capture longer ranging views from inside the PDNP.	Amber
7.4.90-93 – Viewpoints – Pipeline Corridor	It is stated that a 'limited number' of VPs will be selected for the pipeline corridor. These VPs have not been presented at this stage. At this stage, no ZTVs have been produced for the pipeline route.	It is unclear why only a limited number of VPs are being considered for the Pipeline Corridor. The corridor, whilst considered temporary, will present a significant linear feature in the landscape and has potential to introduce significant adverse effects. In addition, without successful reinstatement, long term residual effects may occur. In particular, sequential visual impacts are possible as a result of the length of the pipeline. Appropriate VPs must be selected to ensure these sequential effects are considered.	Amber

		Use of ZTVs for the pipeline route may be appropriate to both illustrate the extent and range of visual effects, but also to identify key viewpoints and routes likely to experience sequential effects.	
7.4.90-93 – Viewpoints – AGIs	Paragraph 7.4.93 notes that due to the AGIs being small, visual impacts are likely to be localised. At this stage, no ZTVs have been produced to evidence this.	Natural England advises that ZTVs should be produced to evidence the suitability of a 2km Study area, and the selection of representative VPs.	Amber
Section 7.5 – Identification of Potential Effects	Natural England welcomes identification of effects to the special qualities of the PDNP and its setting during both construction and operation. These are relevant for all capture facilities, Northern AGI and Pipeline East. Particular reference is made at paragraph 7.4.15 to impacts to ecological designations having knock on effects to the value attached to the landscape. This is also relevant to non-designated habitats, in particular irreplaceable and priority habitats, which cannot be reinstated following pipeline installation, for example.	Natural England advises that potential permanent effects from pipeline reinstatement works must be considered in the ES. Particular consideration of geology and hydrology is relevant to avoid long term residual effects from scarring of the land. For example, where bedrock excavation is required during pipeline burial there is potential for changes to hydrology and subsequently above ground vegetation. Consideration must be given to ecological impacts that may affect the value attached to the landscape. In particular, effects to irreplaceable and priority habitats that cannot be reinstated should be avoided.	Amber
7.6 - Methodology	Natural England welcome the use of GLVIA3. Paragraph 7.6.5 states that ‘<i>The LVIA will include a separate assessment of the likely effects on the purposes and special qualities of the PDNP.</i>’ This is welcomed.	This assessment is likely to be our primary focus, given our statutory role in advising on the impacts of NSIP proposals on the statutory purposes of designated landscapes to conserve and enhance natural beauty, as set out in the Planning Inspectorate’s Advice Note 11, Annex C ⁶ .	

⁶ <https://www.gov.uk/guidance/nationally-significant-infrastructure-projects-nsip-advice-on-working-with-public-bodies-in-the-infrastructure-planning-process-annex-c-natural-e#designated-landscapes>

	The use of NatureScot's 'Special Landscape Qualities - Guidance on assessing effects' is also considered appropriate.	It will be important for the ES to clearly detail expected construction timelines and any phasing, to support the assessment. Natural England is keen to engage with the Applicant on the assessment of impacts to the PDNP and its setting.	
Cumulative Effects	Little reference has been made in this chapter regarding cumulative landscape assessment.	The assessment should include cumulative effects of the development with other relevant existing or proposed developments in the area on the National Park and its setting. Comments made in Table 1 regarding Cumulative Effects are also relevant.	Red
7.8 - Mitigation	Natural England welcomes the reference made to the mitigation hierarchy. At this stage, our advice on any required mitigation is limited. Some key points are highlighted in the recommendations column.	Paragraph 7.8.2 notes that a reinstatement strategy will be provided. This is likely to be a key mitigation measure, as proper reinstatement to baseline conditions is needed to avoid permanent impacts from pipeline, as described elsewhere in this table. Paragraph 7.8.4 states '<i>The design will also identify opportunities for landscape restoration and enhancement, by introducing planting which repairs or reinforces existing vegetation patterns and contributes to biodiversity net gain</i>'. This is welcomed; Natural England advises that the relevant Local Nature Recovery Strategies (LNRS) should be considered with regard to restoration and enhancement. The PDNP Management Plan should also be used to inform decision making on ecological and landscape enhancements.	
Tables 7-18 to 7-24 - Summary	Table 7-22 has scoped out impacts to the PDNP for both temporary and permanent effects from all stages of development of the Pipeline (East).	Impacts to the PDNP from the Pipeline (East) must be scoped in to the assessment. This includes the pipeline both within the PDNP itself, and its setting.	Red

	This is incorrect and contradicts the chapter's content. Natural England agrees that the Central Feeder AGI can likely be scoped out of assessment of impacts to the PDNP due to its distance from the designation and the intervening settlement of Macclesfield.		

2.3 Protected Species Licencing

2.3.1 Table 6: Protected Species – Chapter 6

Reference	Comment	Recommendation	Key Issues (Amber/Red)
Chapter 6 – Biodiversity	Natural England's general advice with regard to protected species licencing is set out in the recommendations column.	The Applicant should check to see if a mitigation licence is required using Natural England guidance on licensing Natural England wildlife licences. We have set out in the remainder of this table our advice on the suitability of relevant currently planned species surveys. Where surveys show a need for a protected species licence, applicants can make use of Natural England's charged 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.	
Table 6-13 Scope of Proposed Development's Biodiversity Surveys	GCN - Current survey proposals focused on eDNA, traditional presence/absence, and population size classes where necessary are consistent with best practice and NE's expectations regarding licensing requirements.	The recognition of the need for population size class assessments in areas where impacts from the scheme may be higher and involve permanent habitat loss is welcomed, and should be re-evaluated as necessary as the project design develops. Similarly, if there are impacts to GCN occurring in areas of high habitat suitability and/or high functional importance, extending the survey buffer from 250m to 500m should be considered as appropriate.	
Table 6-13 Scope of Proposed Development's Biodiversity Surveys	GCN – District Level Licencing: Footnote 1 states: <i>'Proposed survey and licensing route for great crested newt will need to be confirmed through consultation with stakeholders in relation to District Level Licensing (DLL) or traditional EPS mitigation licensing. Detailed survey proposals may subsequently be developed.'</i>	Natural England advises that a project-wide district level licencing approach is not possible for this project. This is primarily due to the scheme crossing areas which are not part of an active DLL scheme. It is recommended that early engagement with Natural England's Wildlife Licencing Service (NEWLS) should be sought to agree the approach to GCN licencing for the project.	
Table 6-13 Scope of Proposed Development's Biodiversity Surveys	Bats – Current survey proposals are sufficient and appropriate for a scheme with a long linear spatial footprint.	As recognised and stated in Table 6-13 regarding the proposed bat survey effort, where access or health and safety concerns preclude the use of standard survey methods, alternative survey techniques should be used wherever possible to obtain relevant information.	
Table 6-13 Scope of Proposed Development's	Badger – The proposed survey approach is broadly consistent with Natural England badger licensing guidance on sett surveys, coverage and buffer zones.	With respect to main setts specifically, a 30m buffer is acceptable for initial scoping information; however, a 50m buffer may be more appropriate during planned works, dependent on the type of works to be	

Biodiversity Surveys		undertaken nearby, and on any mitigation measures such as exclusion.	
Table 6-13 Scope of Proposed Development's Biodiversity Surveys	Otter – The proposed survey effort with respect to otters is appropriate, proportionate, and in line with best practice guidance.	No specific comments or recommendations to make at this time regarding otters.	
Table 6-13 Scope of Proposed Development's Biodiversity Surveys	Water Vole – The proposed survey approach is broadly in line with NE's expectations regarding adherence to best practice and for licensing requirements.	Surveys should extend between 200m and 500m upstream and downstream of development activity to ensure identification of suitable water vole habitat, although this can be scaled to an extent depending on the proposed level of development and impacts nearby. It is noted, though, that proposals are to undertake water vole surveys in conjunction with otter surveys where possible, and for which the larger and expected survey buffers for upstream and downstream surveys have been proposed, and so may well be sufficient.	
Table 6-13 Scope of Proposed Development's Biodiversity Surveys	Reptiles – The initial proposed survey effort with respect to reptiles is sufficient; however, this may need refining as the project design develops, particularly towards the Western end of the pipeline footprint where works may intersect with areas suitable for both common and EPS species of reptile.	Further consideration should be given to the need to carry out additional surveys, including transects and refugia grids where relevant, particularly if it is likely that the project will result in impacts to habitats used by reptile species.	
Table 6-7: Biodiversity Baseline - Pipeline	Natterjack Toads – No specific references to survey effort for Natterjack Toads has been made within Table 6-13, only within Table 6-7 in the context of The Dee Estuary and Ribble & Alt Estuaries Ramsar Sites.	Consideration must be given to the need to carry out specific survey work to identify the presence of, and therefore any likely impacts from the scheme to, Natterjack Toads, particularly towards the Western end of the pipeline footprint, where the works may intersect with habitats associated with those connected to the Red Rock SSSI and Dee Estuary Ramsar, which are designated for Natterjack Toads. If impacts	Red

		are identified and cannot be avoided and designed out, then the need for licences should be considered as appropriate.	

2.4 Soils and Best and Most Versatile Agricultural Land

2.4.1 Table 7: Soils & BMV land – Chapter 13

Reference	Comment	Recommendation	Key Issues (Amber/Red)
Section 13.2 – Legislation, Policy & Guidance	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 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 the ES.	Further guidance is set out in the Natural England Guide to assessing development proposals on agricultural land ; this should be referenced within the ES.	
Section 13.4 – Baseline Environment	NE welcomes the use of provisional ALC mapping to inform the baseline environment and provisional BMV land take for each element of the development, however, it must be noted that <u>provisional ALC mapping and desk-based assessment cannot be used to identify and avoid BMV land during detailed design</u> . This is due to both the scale (80ha) and absence of differentiation between ALC grades 3a and 3b within the provisional mapping.	The ES should present a breakdown of land take for each element of the proposal, including ALC grade and amount of BMV.	
Section 13.5 – Planned Surveys	ALC survey is planned, but only ' <i>Focussed on localised areas within the Scoping Boundary where initial ALC Grade is 3 or above</i> '. Natural	Natural England advises a detailed ALC survey should be undertaken across the full order limits prior to consent, in line with established best practice for land	Amber

	England does not agree with this approach. Whilst the Provisional Mapping is a helpful tool to inform early stage design and routing, it should not be relied upon to inform the ES Assessment.	quality assessment and the sustainable management of agricultural soils, to enable: - avoidance of BMV land as far as practicable; - a complete assessment of the effects of all parts of the development on agricultural land quality, and - to inform soil management and reinstatement. The capture facilities, AGIs and other above ground infrastructure may lead to the permanent loss of agricultural land. The impact of the full pipeline installation, whilst being temporary, has potential to degrade land quality without mitigation (i.e. appropriate soil management).	
Section 3.4.8 – Pipeline Routing	The early pipeline routing considered Grade 1 and 2 agricultural land, but has not considered Grade 3a as a result of the provisional mapping not differentiating between 3a and 3b. At this early stage, ALC survey of route options is not expected and is likely to be disproportionate, however, NPS EN1, paragraph 5.11.12 specifies minimising impacts to land of all BMV grades (1, 2 & 3a). As such, without appropriate ALC survey of the emerging order limits, the ability of the project to effectively avoid BMV land is limited.	Natural England advises a detailed ALC survey should be undertaken across the full order limits prior to consent, in line with established best practice for land quality assessment and the sustainable management of agricultural soils.	Amber
Section 13.7 – Scope and Methodology	NE welcomes the use of IEMA's 'A New Perspective on Land and Soil in Environmental Impact Assessment'. The sensitivity of BMV land has been identified	NE advises that the Magnitude of effects to BMV land should be assessed as: - Permanent loss of more than 20ha BMV land: Major	Amber

	correctly.	- Permanent loss of between 5 and 20 ha of BMV land: Moderate - Permanent loss of less than 5ha BMV land: Minor	
Section 13.7 – Scope and Methodology	No indication is provided regarding the cumulative assessment methods for impacts to BMV land.	NE acknowledges there is no one defined approach to cumulative assessment of impacts to BMV land, but advises the methodology set out in IEMA's 'A New Perspective on Land and Soil in Environmental Impact Assessment' may be a useful guide.	Amber
Section 13.8 - Mitigation	Mitigation discussed in this chapter does not include reference to a Soil Management Plan.	A Soil Management Plan is required to ensure soil resources on site are management appropriately during construction, operation and decommissioning to retain the long-term potential of the land. The importance of minimising impacts on soil health are clearly set out at NPS EN1 5.11.13. 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.	Amber
Section 13.9 - Summary	Whilst this chapter considers BMV land, assessment of BMV land is not specifically noted within the Scoping Summary tables 13-15 and 13-16.	Impacts to BMV land must be assessed within the ES.	Amber
Further Guidance - Soil Health	N/A	A new ISEP advice note, ' <i>Soil Health in Environmental Assessments and Reports</i> ', provides a practical framework for assessing development impacts on soil health and is intended to complement the 2022 land and soil guidance by expanding on the assessment of biological and chemical soil properties alongside	

		physical soil functions, see the ISEP land and soil guidance here: New ISEP advice note: Soil health in environmental assessment	
Chapter 13 - Peatland	Natural England notes an absence of reference, (including importance, assessment, avoidance or protection) of peatlands.	Due to the scale of the development, consideration of the sustainable management of the soil resource should be included. This should include an approach to peat, which should state how it will be identified, development on areas of deep or restorable peat avoided and how any unavoidable impacts on peat will be managed or mitigated. Natural England utilises the England Peat Status Greenhouse Gas and Carbon Storage open data source to identify peat. It may be useful to refer to existing borehole data from the British Geological Survey (BGS) but if there is a lack of data across the proposal site then a peat survey may be required. We advise that peat surveys should be carried out in line with the Peatland Survey Guidance 2017 (Guidance on Developments on Peatland). This includes carrying out a low-resolution peat survey to determine peat depth at a density of 100m x 100m on a regular grid pattern across the whole development area. Where deep peat soils supporting peat habitat are identified, a higher resolution survey may be necessary. The development of a Peat Management Plan alongside the Soil Management Plan for the project is recommended.	Amber

2.5 Biodiversity Net Gain

2.5.1 Table 8: Biodiversity Net Gain – Chapter 6

Reference	Comment	Recommendation	Key Issues (Amber/Red)
Section 6.11 – Biodiversity Net Gain	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. This includes the intertidal zone but excludes the subtidal zone (an approach to marine net gain is being developed but this will not form part of mandatory BNG). As such, Natural England welcomes the commitment made by the applicant (paragraph 6.2.2 & Section 6.11) to deliver a minimum of 10% biodiversity net gain, evidenced by the use of the Statutory Biodiversity Metric.	The scheme should consider the relevant Local Nature Recovery Strategies ⁷⁸⁹¹⁰ in any Biodiversity Net Gain enhancement design. This can both deliver strategic benefit to the local environment and achieve higher unit scores in the metric via the strategic significance multiplier.	

2.6 Ancient Woodland, Priority Habitats/ Species & Irreplaceable Habitats

2.6.1 Table 9: Ancient Woodland, Priority Habitats & Irreplaceable Habitats

Reference	Comment	Recommendation	Key Issues (Amber/Red)

⁷ <https://derbyshirenaturerecovery.co.uk/strategy/lhrs/>

⁸ <https://cheshirelnp.co.uk/local-nature-recovery-strategy/>

⁹ <https://www.liverpoolcityregion-ca.gov.uk/local-nature-recovery-strategy>

¹⁰ <https://staffsandstokelnrs.co.uk/>

Tables 6-4 and 6-7 – Baseline Information	No Ancient Woodland is mapped within 1km of the capture facilities, however numerous parcels have been identified within or adjacent to the Pipeline Route. Ancient Woodland and Ancient and Veteran Trees are Irreplaceable Habitats, i.e. those habitats which would be technically very difficult (or take a very significant time) to restore, recreate or replace once destroyed, taking into account their age, uniqueness, species diversity or rarity. NPS EN1 sets out strong protections for Ancient Woodland: - Paragraph 5.4.33 states <i>‘Applicants should include measures to mitigate fully the direct and indirect effects of development on ancient woodland, ancient and veteran trees or other irreplaceable habitats during both construction and operational phases’.</i> - Paragraph 5.4.55 states: <i>‘The Secretary of State should not grant development consent for any development that would result in the loss or deterioration of any irreplaceable habitats, including ancient woodland, and ancient and veteran trees unless there are wholly exceptional reasons and a suitable compensation strategy exists’.</i>	The development should avoid Ancient Woodland and Ancient/Veteran Trees wherever possible, and include mitigation measures to avoid any indirect impacts where relevant. It should also consider opportunities for enhancement. Natural England and the Forestry Commission have prepared standing advice on ancient woodland, ancient and veteran trees. <u>Other Guidance & information:</u> Natural England maintains the Ancient Woodland Inventory which can help identify ancient woodland. The wood pasture and parkland inventory sets out information on wood pasture and parkland. The ancient tree inventory provides information on the location of ancient and veteran trees.	Amber
Chapter 5 – Air Quality – Section 5.3 & 5.4.7	It is noted that Ancient Woodlands are an irreplaceable habitat and can be susceptible to impacts from air pollution, especially when rich in mosses and lichens.	Where these are within 200m of a road, or could be adversely affected more than 2km from the site boundary, this impact should be considered in line with Natural England’s standing advice on ancient	

		woodland.	
Additional Comments – Priority Habitats and species	N/A	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. 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. 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. The ES 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	
Additional Comments – Irreplaceable habitats	Whilst Priority Habitats have been identified in the baseline, Irreplaceable Habitats are not referenced within the scoping report.	All Irreplaceable habitats should be considered in the ES, with their avoidance being prioritised, owing to the fact they cannot be reinstated.	Amber

2.7 Connecting People with Nature

2.7.1 Table 10: Connecting People with Nature

Reference	Comment	Recommendation	Key Issues (Amber/Red)
Chapter 8 – Traffic and Movement	Paragraph 8.6.28 states that <i>‘An assessment of national/regional walking and cycle routes as well as PRow will also be carried out where these are directly affected by construction works or intersected by a construction route’</i> which is welcomed.	The ES should consider potential impacts on access land, common land, public rights of way, National Trails and, where appropriate, the England Coast Path and coastal access routes in line with NPS EN-1. NPS EN-1 paragraph 5.11.30 states: <i>‘Public Rights of way, National Trails, and other rights of access to land are important recreational facilities for example for walkers, cyclists and horse riders. The Secretary of State should expect applicants to take appropriate mitigation measures to address adverse effects on coastal access, National Trails, other rights of way and open access land and, where appropriate, to consider what opportunities there may be to improve or</i>	

		<i>create new access. In considering revisions to an existing right of way, consideration should be given to the use, character, attractiveness, and convenience of the right of way'.</i> The ES 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. 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. The linear nature of the project may offer opportunities to connect the landscape for people and nature.	

2.8 Habitat Severance & Climate Change

2.8.1 Table 11: Habitat Severance & Climate Change

Reference	Comment	Recommendation	Key Issues (Amber/Red)
Chapter 6 -	No reference has been made to Habitat	Given the sheer scale of the project, a landscape-scale	Amber

Biodiversity	Severance in the Scoping report. The scale and linear nature of the proposed pipeline, approximately 200km in length, mean there are likely to be significant impacts on wider biodiversity through habitat severance and permanent or temporary loss. This is made particularly relevant by our changing climate. Opportunities for enhancement of habitats, including linear connections to improve connectivity across the project's footprint, should be sought and included wherever possible.	assessment will be needed on severance impacts on biodiversity and the functionality of habitats, including timescales of construction and quantum of habitat affected, along with proposals on how impacts to these features will be avoided through the mitigation hierarchy.	
Chapter 17 – Climate change	Whilst it is beyond Natural England's remit to provide detailed comment on the proposed climate change assessment, Natural England can provide the adjacent recommendations.	The England Biodiversity Strategy published by Defra establishes principles for the consideration of biodiversity and the effects of climate change. The ES should reflect these principles and identify how the development's effects on the natural environment will be influenced by climate change, and how ecological networks will be maintained. The NPPF requires that the planning system should contribute to the enhancement of the natural environment 'by establishing coherent ecological networks that are more resilient to current and future pressures' (NPPF Para 164), which should be demonstrated through the ES. Avoidance of Peatlands and other carbon sequestering habitats should also be specifically considered in the ES, with opportunities for their enhancement, e.g. via peatland restoration or woodland planting, being incorporated wherever possible. Given the nature of the project, it is particularly pertinent that all opportunities are taken to minimise the carbon footprint of the development and contribute to net zero not just via mechanical carbon storage, but also via	

		good design and implementation of nature based solutions. 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.	

3 Natural England's Advice on the Marine and Intertidal Scope of the EIA

3.1.1 Table 12: Marine Assessment – Chapter 12

Reference	Comment	Recommendation	Key Issues (Amber/Red)
Section 12.1 – General Comments	NE notes the absence of a clearly defined scope for Marine Ecology. This is despite works extending to Mean Low Water Springs (MLWS) and therefore likely to affect nearshore and intertidal habitats. The current project description lacks sufficient detail to fully understand the likely interactions with designated intertidal habitats.	Include a dedicated marine and intertidal ecology topic that covers habitats, species and ecological processes from Mean High Water Springs (MHWS) to MLWS and any offshore interaction.	Amber
Section 12.1 – General Comments	Internationally designated sites, MCZs and coastal SSSIs that may be affected by coastal or marine works are not clearly identified or have been grouped together under incorrect names (e.g. Mersey Narrows & North Wirral Foreshore SPA, SAC, Ramsar and SSSI). The intertidal part of the scoping boundary is within and in close proximity to the following sites: - Mersey Narrows and North Wirral Foreshore Ramsar and SPA - The Dee Estuary Ramsar and SPA - Mersey Estuary Ramsar and SPA - Ribble and Alt Estuaries Ramsar and SPA - Dee Estuary SAC	Provide a comprehensive list of marine and coastal designations screening including SACs, SPAs, Ramsar Sites, MCZs and coastal SSSIs. This should be supported by a clear Zone of Influence justification. Natural England recommend that the Applicant checks and clarifies whether any areas of the Liverpool Bay SPA fall within the Scoping Boundary.	Amber

	- Sefton Coast SAC - Liverpool Bay SPA - Dee Estuary SSSI - North Wirral Foreshore SSSI - Mersey Narrows SSSI - Sefton Coast SSSI We note that Liverpool Bay SPA is described as adjacent to the Proposed Development's Scoping Boundary, although mapping indicates the scoping boundary may encroach into this SPA.		
Section 12.1 – General Comments	Due to there being insufficient detail to assess potential impacts at this stage, post-construction monitoring should be scoped in for intertidal habitat recovery.	Include proposals for proportionate post-construction monitoring of intertidal habitats where disturbance occurs.	Amber
Section 12.1.1	The coastal AGI to MLWS pipeline(s) will be installed using a mixture of trenchless (e.g. Horizontal Directional Drilling (HDD)) and trenching methods within the intertidal area. We understand that the project design will continue to be developed, with the statutory consultation presenting data from forthcoming ecological and geophysical surveys. Key to this, for coastal habitats, in both the intertidal and terrestrial Landfall Zone (between MLWS and the landward side) will be the feasibility of trenchless cable installation methods.	The Applicant should continue to develop and finalise the project design and construction methods (in particular the feasibility of trenchless installation methods) using the forthcoming baseline survey data and analysis. The use of trenchless pipeline installation will help minimise impacts of the installation in the sensitive intertidal zone. However, the Applicant should also assess/consider the worst-case scenario i.e. open-cut methods in their assessment. Natural England is aware from past experiences that the use of HDD relies heavily on local site and environmental conditions and so cannot be guaranteed. To facilitate this, we support the undertaking of	Amber

		feasibility studies and ground investigations including undertaking baseline habitat surveys of coastal habitats in a timely way to inform the methodology and environmental assessments. A key output of this will be providing a Landfall HDD (trenchless installation methods) Feasibility report. The Applicant should take into consideration lessons learned from other projects that have made landfall along the Lancashire coast and elsewhere nationally. Evidence from similar projects should be presented to show what distances HDD for a pipeline of similar diameter has been achieved.	
Section 12.1.1	Geotechnical Information - experience from other cable installations, primarily along the Lincolnshire Coast, has identified issues with the technical viability of HDD with failures and several sink holes and bentonite frac-outs occurring. Therefore, we advise at the time of consent geotechnical investigations in the form of boreholes, will be required to support the Application and demonstrate that HDD is feasible, especially within the boundary of a designated site.	As a minimum, Natural England advises that geotechnical data from the intertidal area of the project and the entry and exit pit locations are most relevant, particularly recognising that the first 30m from the entry pit is where most frac-outs are likely to occur. Natural England directs the Applicant to advice provided to the Theddlethorpe Hydrogen Storage scoping response on the Lincolnshire Coast and in particular comments relating the sea water extraction pipe for the associated desalination plant. These can be found from page 168 of the Scoping Opinion Adopted by the Secretary of State on 30 October 2025 . The same comments in relation to size of pipeline required, its need to be reinforced and implications for trenchless techniques in relation to depth and distance.	Amber
Section 12.1.1	HDD Method Statement and Contingency Plan. In relation to HDD and potential bentonite frac-out/break out we draw the Applicant's attention	Produce a HDD method statement and contingency plan.	Amber

	to the North Falls OWF EN010119-001612-7.15 Outline Horizontal Directional Drill Method Statement and Contingency Plan (Rev 4).pdf. We believe this to be a good example of what is required. We also advise that the Applicant should consider how the coast may alter throughout the lifetime of the project, both in terms of vertical change in beach profile and coastal retreat. In other words, consider how will cable / pipeline burial and siting of infrastructure be managed throughout the lifespan of the project? Even though trenchless techniques are designed to reduce impacts to sensitive habitats they still need to move between the entry and exit pits. How will this be managed? Please see advice provided on the Sea Link Kent landfall submitted at Deadline 3a: Appendix J3A. All of the concerns and considerations raised there are also relevant to this project, especially in relation to access from sea to the exit pit location, and mitigating impacts from vehicle movements. We would also expect a Landfall Method Statement based on geophysical and geotechnical investigations to be submitted into examination. Additionally, we would expect a HDD Management plan similar to that which was submitted by the Applicant at Deadline 8 of the North Falls Examination (Outline HDD Method Statement and Contingency plan).		
Section 3.2.1.7	Exit pit locations.	Substantial further information is required on the exit pit locations, pipeline protection, use of cofferdams, timing	Red

	When considering exit locations, we advise there is likely to be a requirement for pipeline protection due to the dynamic nature of the coastline and erosion. The need for pipeline protection will need to be fully justified with consideration given to Marine Coastguard Agency (MCA) issues, due to reducing water depth by no more than 5%, changes in seabed elevation over the lifetime of the project and avoiding disruption of sediment transportation. We advise considering other projects in the area and the lessons learned from their development works. In particular, the potential need for pipeline protection at the exit pit location and the implications from seabed lowering at this location and along the pipeline over the lifetime of the project, potentially creating a resistant raised pinnacle and/groyne which is likely to disrupt coastal process, sediment transport and affect sensitive habitats. The construction and use of cofferdams require further consideration. Considering that the duration of this activity is potentially 6 months per cofferdam, what is the potential for changes in hydrodynamics and sediment transport on sensitive habitats and coastal erosion? Will there be any scouring and how will that recover? If there are two cofferdams <i>in situ</i> at the same time, will they funnel tidal inundation increasing velocity and potentially erosion of habitats along its path and directly to the natural sea coastal defence? Again, Sea Link Appendix J3A is relevant here.	of works, and scale of working corridors.	

	In addition, due to how coastal habitats are formed, repeating movement of vehicles will compact the sediment causing a depression when compared to surrounding habitat. This causes pooling of water, increasing velocity of tidal inundation and the potential to inhibit vegetation establishment.		
Section 3.2.1.7	The proposed construction of cofferdams associated with each pipeline raises significant concerns regarding potential impacts on qualifying bird features within nearby designated sites. Timing of works - given installation works may require 18 months, affecting designated sites with wintering bird interest, we strongly advise careful consideration of timings of works to minimise overlap with the wintering bird season. This could involve installation of one pipeline during summer months of the first year (between 1st April and 30th September) followed by installation of the second pipeline during the following summer, also noting winter is not an ideal time for installation due to storms. If this is not possible, or works are planned to occur consecutively, works should be started in April one year and finished in September the following year to prevent works impacting two overwintering periods. If the consecutive option is chosen, clear mitigation will need to be proposed and adopted to limit visual and noise disturbance to birds. A standard cold weather working condition would also need to be adopted.	Provide clear detailed information on the scale of potential cofferdams along with working areas and disturbance buffers. Worst-case scenarios for disturbance and habitat loss should be presented. Consider timing of construction of the cofferdams to minimise impacts to the features of nearby designated sites.	Red

	Natural England notes a working corridor of 100m is proposed which is potentially 50m in length. This is a sizeable area of impact which will have an additional 450m disturbance zone for birds beyond this in the intertidal zone. In relation to the HRA, this scale of impact will incur a Likely Significant Effect (LSE), with a high risk of Adverse Effect on Integrity (AEol) from the lost foraging/roosting areas, especially during high spring tides.		
Section 12.2.19	There is insufficient detail for the impact pathways. Potential impact pathways such as sediment plumes, noise, changes to prey availability and habitat loss/ disturbance are not clearly addressed. Visual and noise disturbance are not mentioned for birds. Only changes in existing lighting conditions are noted in the list of potential impacts on passage and wintering birds during construction. This is particularly important during the construction phase of the project where there could be significant disturbance to passage and overwintering birds.	Further detail should be provided for all relevant marine impact pathways and qualifying features. Identification of receptors, pathways and the definitions for the sensitivity of receptors should be discussed and agreed with Natural England as part of the Evidence Plan Process. We advise that consideration of visual disturbance and displacement impacts on red-throated diver and common scoter associated with Liverpool Bay SPA from any vessels used within the Scoping Boundary should be considered for both construction and operation, noting that vessel displacement typically extends to 2km for red-throated diver and 2.5km for common scoter. Visual disturbance and displacement by vessels is a recognised pressure for these features and should be assessed alongside lighting impacts. Consideration should be given to the magnitude, duration, and spatial extent of disturbance on the features within the Scoping Boundary in relation to the relevant Biologically Defined Minimum Population Scale (BDMPS) population for the species and season	Amber

		(Furness, 2015¹¹). Whilst we recognise that for the purposes of this EIA Scoping Report, the visual disturbance pathway may only require consideration outside the SPA, these should still be addressed, with HRA screening confirming whether any pathway to the SPA exists. However, we highlight here that the Conservation Objective¹² relating to the distribution of qualifying features of Liverpool Bay SPA may apply to most or all of the attributes listed in the associated Supplementary Advice to the Conservation Objectives (SACOs)¹³ and should ultimately be considered against them. Ensuring integrity of attributes relating to supporting habitats and processes should allow birds to distribute themselves optimally within (<i>and, sometimes, outside</i>) the SPA boundary. This is perhaps particularly relevant for food availability; extent and distribution of supporting habitat; quality of supporting habitat; predation; and disturbance caused by human activity.	
Section 12.2.7	As a minimum, the baseline surveys for intertidal habitats should include a description of the physical and biological nature of the seabed within, and adjacent to, the project area.	Natural England has published best practice advice for offshore wind and cable projects. This includes relevant information on the level of detail required for the baseline characterisation surveys within the marine area of the project.	Amber
Section 12.1	NE welcomes reference to Physical Processes but considers the scope insufficiently detailed to rule out impacts on sediment transport, erosion/accretion or coastal morphology.	Include a proportionate physical processes assessment, including sediment pathways, particularly for intertidal and nearshore areas.	Amber

¹¹ Furness, R.W., (2015). *Non-breeding season populations of seabirds in UK waters: population sizes for biologically defined minimum population scales (BDMPS)*. Natural England Commissioned Reports, **164**. Natural England, Peterborough.

¹² <https://publications.naturalengland.org.uk/file/6428729689767936>

¹³ <https://publications.naturalengland.org.uk/publication/3236717?category=3229185>

Section 12.2.4 (Fish and Shellfish)	The North Wirral foreshore and adjacent intertidal areas are of high importance for shellfish resources, particularly cockles (<i>Cerastoderma edule</i>) which can support commercially and culturally significant inshore fisheries within the Dee and Mersey estuarine system. Intertidal construction activities have the potential to affect cockle beds directly through changes to sediment composition and hydrodynamic processes. While Natural England recognises the ecological importance of shellfish habitats, management of commercial shellfish fisheries falls within the remit of the North Western Inshore Fisheries and Conservation Authority (NWIFCA).	The submitted ES should acknowledge the importance of the area for cockle fisheries and assess potential direct and indirect ecological effects on shellfish habitats. Natural England defers to NWIFCA for detailed advice on fisheries management and commercial impacts.	Amber
Chapter 19 – Consideration of Alternatives	Natural England seeks to understand the consideration given to alternative carbon storage sites both in the Irish Sea and North Sea as well as alternative non-pipeline transportation (ship, rail, road) for connection with an offshore carbon storage site, and particular to the Morecambe Net Zero (MNZ) carbon store. The central location of the Peak Cluster project gives rise to a number of potential storage sites in UK waters. Natural England appreciates that due to the scale of the industrial cluster, non-piped methods to the coast will likely be discounted. However, there should also be consideration of shipped transport from a port location to offshore stores. The Peak Cluster proposed development ties the	All alternatives should be fully considered and presented for the proposed development.	Red

	potential of carbon storage sites to those within the Irish Sea and potentially only the Morecambe Net Zero site, as the Scoping Report states that MNZ will be developing and operating the pipeline from the Coastal AGI. Natural England wishes to flag that at present, there is only one location which has been awarded a storage permit by the North Sea Transition Authority (NSTA) in the Irish Sea, which is the HyNet Carbon Dioxide Transportation and Storage Project - Offshore. However, we are aware that MNZ has been awarded a storage licence and is working towards its full storage permit. Furthermore, the NSTA has launched the second carbon storage licensing round which offers two locations within the Irish Sea. As we are not aware of any live proposals for carbon storage sites except HyNet, this poses a risk to a guaranteed offshore storage site.		
Chapter 19 – Holistic assessment and cumulative impacts	Natural England highlights that the pipeline begins under this proposed development and continues under a separate consent to the offshore storage. We consider the two projects are intrinsically linked, and furthermore, that the storage development is necessarily required for the proposed development to come forward. Natural England, therefore, seeks to understand a clear and practical approach to the assessment of the proposed development and MNZ projects to ensure that they are considered holistically and that cumulative impacts can be	Natural England advises that careful consideration is required by the Applicant and relevant parties to consider how conditions, including mitigation measures and potentially compensation measures, can be implemented and consented in a holistic context with other intrinsically linked projects (notwithstanding this is subject to all other aspects of the Peak Cluster proposals being addressed to the satisfaction of the decision maker). Natural England has advised for similar scenarios on other projects that to manage this risk it may be appropriate to include a condition stating that should the	Red

	fully considered. Particularly where timeframes are unlikely to align, the merits of the applications are unlikely to be considered by the same examining authority/competent authority and there are subsequent implications for DCO requirements and marine licence discharge. Without which there is the potential risk of inconsistent assessment, determination and the risk of overlapping or contradictory requirements.	proposed development gain permission, no works commence until all other developments and associated works permissions had been obtained. Such an approach would ensure that any secondary, indirect and cumulative impacts identified were able to be addressed and manages the risk of stranded assets.	
Sections 19.2 and 19.3	The North Wirral foreshore is subject to multiple coastal and marine pressures. Marine cumulative effects are not clearly addressed. No projects have been identified for the shortlist of other developments to be included in the cumulative effects assessment (CEA). Therefore, we are unable to comment on the scope of the CEA at this stage. For marine developments, this list should include Irish Sea offshore wind farms and other renewable energy projects such as Mersey Tidal Power project. Impacts on designated site features from other plans and projects, such as the nearby RNLI life boat launch location, should also be taken into account.	Include coastal and marine receptors within the cumulative effects assessment, including other foreshore works and dredging activities. Provide a full list of other developments to be included in the cumulative effects assessment and in-combination assessment.	Amber
Additional Comment	Additional considerations. Unexploded Ordnance (UXO) clearance.	Further information is required on the potential risk of UXOs and the need to make the location of the exit pits safe.	Amber
Additional Comment	Repairs and replacement over the lifetime of the project. A leak under the intertidal zone will be challenging to repair without excavation.	Further information is needed on how the infrastructure will be accessed for repairs and replacement over the lifetime of the project.	Amber

Annex B: Standard Advice for Air Quality Impacts in Nationally Significant Infrastructure Projects (NSIPs)

Natural England provides the following standard advice on air pollution. This advice relates to the protection of protected sites under the Conservation of Habitats and Species Regulations 2017 (the Habitats Regulations) and the Wildlife and Countryside Act 1981 and should be taken as Natural England's formal representation. This standard advice is applicable to all stages of the NSIP process and may be used by the applicant for NSIP pre application stages, by the Examining Authority (ExA) during the statutory stages of the NSIP and by the relevant Secretary of State as the competent authority.

Protected sites are 'sites of special scientific interest' (SSSIs) and 'habitats sites' (also called 'European sites'). For the purposes of this advice, Habitats Sites are Special Areas of Conservation (SACs), possible SACs, Special Protection Areas (SPAs), Potential SPAs, Ramsar sites, and sites identified, or required, as compensatory measures for adverse effects on Habitats Sites. Although their regulatory frameworks differ, the general principles and approach for air pollution assessment outlined for Habitats Sites are also relevant for SSSIs. Where the following advice applies to both, we use the term protected sites. Where the advice or approach differs, the individual terms are used.

This includes advice on information that is required to assess this and how to interpret the results of air quality modelling for the decision maker to conclude whether air quality impacts would have an adverse effect on the integrity of a Habitat site or a SSSI. You should also consider any relevant caselaw that could affect how you carry out any air quality assessments.

Air pollutants

This advice covers the following air pollutants from the construction, operation and decommissioning phases of a proposal

- ammonia (NH₃)
- nitrogen oxides (NO, NO₂ or NO_x)
- nitrogen deposition
- acid deposition
- sulphur dioxide (SO₂)

Standing advice on air pollution and development is also available here:

<https://www.gov.uk/guidance/air-pollution-and-development-advice-for-local-authorities>

Whilst the standing advice does not cover NSIPs, it does include additional technical advice which may prove useful. However, in summary, Table 1 provides the steps that we advise should be taken to assess air quality impacts on protected sites. The applicant should provide their own assessment containing the information and detailed modelling you need. You need to review this and make your own conclusion.

Table 1: Sequential approach to air quality assessments

Stage	Step	Supplemental evidence/ basis for judgment
Initial screening for credible risk of an effect	1 Check Distance criteria - could significant emissions reach a protected site? Yes = move to Step 2 No = no further HRA required	The Air Pollution Information System (APIS) includes an introduction to air pollution. APIS provides site specific information on the interest features of individual protected sites and

			the sensitivity to air quality impacts of those features. Please see Table 2 for industrial air pollution screening distances. For road traffic impacts, roads on the affected road network that lie within 200m of a designated site should be considered. Use Magic Map to check the location of designated sites. Search for the location then select the 'Designations' option.
	2	Check if the qualifying habitats or supporting habitat of qualifying species are sensitive to air quality impacts. Yes = move to Step 3 No = no further HRA required APIS Site relevant Critical Loads and Levels (based on literature and professional judgement) http://www.apis.ac.uk/src1 Some habitats may not have a critical load because there is not enough data. In these cases, you should find the critical load for a similar habitat type or feature.	The qualifying features of Habitats Sites can be identified in the relevant Site Conservation Objectives and Supplementary advice packages, which include a definitive list of legally qualifying features. These objectives are available here. Alternatively, a list of qualifying features can also be found by searching for the Habitats Site and SSSIs on Designated Sites View, alongside Conservation Objectives and Supplementary Advice for Habitats Sites. The above links will also show whether any of the qualifying features for Habitats Sites have a Restore or Maintain Conservation Objective in relation to air quality thresholds (critical levels or loads). If the site is a SPA or an SAC/SSSI designated for an animal species (as opposed to a habitat), determine whether the predicted pollution effects on the supporting habitat will have a negative effect on the notified species.
Detailed AQ modelling	3	Undertake detailed modelling using a recognised dispersal model – i.e. Atmospheric Dispersion Modelling System (ADMS) Unless robust site-specific evidence is provided, we advise the lower range of the critical load should be used in modelling. If there are site specific reasons why it is more appropriate to use the higher end of the range, then this should be clearly evidenced.	Air Quality modelling should include relevant scenarios that are clearly identified. One such example of scenarios is a baseline plus future forecasts as follows: Baseline, a construction year, and future operational year(s), do nothing (without proposal), do something (with proposal); taking into account background trends for each pollutant). For proposals that will emit pollutants from a point source, it is helpful to provide isopleths of the dispersion modelling results, showing the predicted contours of pollutant concentration and deposition of the development. These may be assessed against the locations of protected sites and sensitive features within those sites. At least 3 years of meteorological data should be included within the AQ modelling for sources other than for road transport modelling The Institute of Air Quality Management (IAQM) has produced the following document to assist its

			members in the assessment of the air quality impacts of development on designated nature conservation sites: air-quality-impacts-on-nature-sites-2020.pdf
Applying screening thresholds	4a	Apply Screening Threshold Alone If below threshold alone, move to step 4b. If above = move straight to step 5	Ascertain the Process Contribution (PC) from the plan or project (emissions and predicted deposition). Apply Screening threshold (1% of critical level or load) alone using the <u>annual averages</u>. If the process contribution is less than 1% of the relevant long-term benchmark (Environmental Assessment Level, Critical Level or Critical Load), the emission is not likely to have a significant effect <u>alone</u> irrespective of the background levels.
	4b	Apply Screening Threshold In-combination. If below threshold in-combination = no LSE/significant risk of damage etc and no further assessment required. If above = move straight to step 5 Applicants might use the Joint Nature Conservation Committee (JNCC) 'decision-making thresholds' as a reason for not completing an in-combination assessment. If so, you should check they have correctly followed the JNCC guidance on decision-making thresholds. If this guidance shows they do not need to complete an in-combination assessment, continue to step 5. If applicants have not used the decision-making thresholds, or have not followed them correctly, they will need to provide an in-combination assessment.	Use information from competent authorities (Planning Portal, PINS NSIP register or Environmental Permitting register) to determine if there are plans or projects in the pipeline (not included in the current baseline) that should be considered in-combination If the combined process contribution is less than 1% of the relevant long-term benchmark (Environmental Assessment Level, Critical Level or Critical Load), the emission is not likely to have a significant effect <u>in-combination</u> irrespective of background levels.
Detailed Assessment of ecological impacts	5	This step is to consider the ecological impacts of AQ on the interest features of the designated site and is not based only on numerical figures. If it is not certain whether sensitive features are located within the areas to be impacted, a site visit may be helpful to determine this. For SSSIs, this step should provide all the information necessary, including any required mitigation, for the decision maker to determine if there would be an adverse effect on a SSSI. If Habitats Sites are impacted by the proposals, move to Step 6.	The following information is likely to be helpful for the decision maker: Is the sensitive feature(s) located within the pollution footprint? Should it be there for the site to meet its Conservation Objectives or is there some other, natural reason (e.g. hydrology), why the sensitive feature(s) would not be expected to occur there? Check APIS Trends Tab for reasonable expectation on whether background pollution may be decreasing or not. Habitats that have already been subject to high background nitrogen deposition can develop tolerance to further deposition. This cannot be used to justify further exceedance as it would undermine conservation objectives to reverse decline. You should consider predicted effects on

			the species richness of a habitat against the site's conservation objectives.
Appropriate Assessment (AA) for habitats sites	6	The competent authority to undertake their AA to conclude whether or not there will be an adverse effect on integrity (AEOI) of habitats sites. Any mitigation proposed should also be assessed at this point. Should the AA conclude that the proposal would have an AEOI that cannot be excluded with mitigation measures, consider the derogation route of the HRA process. Should compensation measures be required under derogation, please contact Natural England for specific advice. Note: If an AA has been undertaken of the proposals <u>alone</u> and concluded that there will not be an adverse effect on integrity, if there are residual impacts that are not fully mitigated, these will need to be considered in combination with other plans or projects	Where mitigation is required to enable a conclusion of no adverse effect on integrity to be reached the AA must be able to show that mitigation measures can be relied upon to avoid adverse effects over the full lifetime of the project (ie construction, operation and decommissioning where relevant). To be viable, such measures should be effective, reliable, timely, guaranteed and of sufficient duration. The assessment of such measures should be supported by evidence. When deciding on whether the proposals set out in the NSIP will have an adverse effect on Integrity on a Habitats Site, the Conservation Objectives and any supplementary advice should be taken into account. Including whether the site is already exceeding the environmental thresholds for ammonia, nitrogen oxides and nitrogen deposition and has a restore conservation objective.

Mitigation measures

If you cannot conclude there is no adverse effect, the applicant will need to apply mitigation measures. Measures will only be appropriate if you can quantify their effectiveness in reducing emissions on the protected site. You should check that mitigation measures are in place to avoid adverse effects on site integrity over the lifetime of the project.

Mitigation may include measures that:

- the applicant volunteers
- you impose through formal conditions or restrictions in any permission or authorisation – these may be different or stricter measures than ones proposed by the applicant

Examples could include:

- relocation or redesign of developments to avoid impacts on protected sites
- control of other emissions of the same pollutants with an overlapping effect
- a change in stack height for industrial processes
- Euro 6 standards for construction machinery
- adding wooded shelterbelts, trees, green walls and hedges to limit dispersal of emissions, as long as these measures in themselves would not negatively impact the protected site

Table 2: Industrial air pollution screening distances

Emission source	Distance for SSSIs	Distance for habitats sites
Industrial developments	2km	5km
General combustion processes (under 20MW energy input)	500m	500m
General combustion processes (20MW to 50MW energy input)	2km	2km
General combustion processes (over 50MW energy input)	2km	10km
Mechanical and biological waste treatment	500m	500m
Landfill waste	2km	2km
Compost (under 500 tonnes maximum annual operational throughput)	500m	500m
Compost (500 to 75,000 tonnes maximum annual operational throughput)	1km	1km
Compost (over 75,000 tonnes maximum annual operational throughput)	2km	2km
Airports, helipads and other aviation proposals	5km	5km
Oil and gas exploration and extraction	500m	500m
Quarries	200m	200m
Other industrial developments causing air pollution	500m	500m

Additional advice

Common Standards Monitoring¹ is used to define the ecological condition of a protected site. It is undertaken on a broader level and does not currently consider air quality impacts. The relevant benchmark for assessing impacts is the critical thresholds. Therefore, the existing status of a designated site should not be the sole reason for judgement on potential impact.

For many protected sites, the current background pollution may already be exceeding the relevant critical load/level from a different source type to the project being assessed (e.g. where the main source of background exceedance is due to agriculture, but the proposal is an industrial project). Proposals must consider their own impacts against the relevant environmental thresholds. There are many reasons why background levels are high, but the conservation objective is to 'maintain or restore' air pollutants to within these benchmarks. The objective would be undermined by proposals that add further emissions, including if it compromises any strategic initiatives to reduce air pollution levels.

You must determine if there is evidence that the increased emissions represent a measurable risk and could compromise the strategic initiatives. You would need to consider information on:

¹ [HYPERLINK "https://jncc.gov.uk/our-work/common-standards-monitoring/"](https://jncc.gov.uk/our-work/common-standards-monitoring/) [Common Standards Monitoring | JNCC - Adviser to Government on Nature Conservation](#)

- the extent to which any declining national trends in air pollution, or strategic initiatives to tackle emissions affecting the site more locally, might otherwise lead to improvements
- the rate at which such improvements are anticipated
- the extent of the impacts of a plan or project, and whether those impacts can properly be considered temporary and reversible

If the affected area is small, consider the risk to site integrity proportionally. For example, how important is the area in terms of rarity, location, distribution, vulnerability to change and ecological structure. If it is a supporting habitat, consider its importance to the designated species on the site. Consider any site survey information that may provide evidence of existing impacts.

Emissions from road transport (if applicable):

Emissions from road transport may be an operational impact or be limited to the construction phase of proposals. Roads on the affected road network that lie within 200m of a designated site should be considered. If all affected roads are further than 200m from a protected site, then there is no likely significant effect (habitats sites) or no impact (SSSIs) on protected sites from air pollution

Improvements in vehicle technology and a move to further electrification of the vehicle fleet will, over time, result in lower background levels of nitrogen deposition and nitrogen oxide pollution near to roads. As most sites are currently over the relevant thresholds and have a “restore” objective, this should be noted as a “retardation” of the restore objective and expressed in months and years. Retardation of less than one year is acceptable as air quality is considered against an annual average. Please note that ammonia impacts cannot be assessed in this manner as there is no certainty of a declining trend.

Defra Emissions Factor Toolkit

The Defra Emission Factor Toolkit (EFT) allows for gradual introduction of electric vehicles into the fleet (cars and LGVs) up to 2050. These are the emission factors we advise that NSIPs should be using (which we advise should also consider ammonia emissions as well as NO_x – using one of three sets of emission factors available). However, the User Guide to the EFT highlights that calculation tools only support assessment years 2018 up to 2030, reflecting that predictions and assumptions beyond then become less certain. Where EFT calculated emissions are to be used after 2030 to inform air quality assessments, the EFT indicates that appropriate caveats around the limitations of the analysis must be included to accompany the assessment. We therefore advise that emission factors no later than 2030 are used for HRAs– which would mean percentages of EVs are at predicted 2030 levels. A key concern is that, although EVs themselves have no tailpipe emissions, and the percentage of them will increase, the remaining combustion engine vehicles on the road may become more polluting as they age as selective catalytic reduction technology may create ‘ammonia slip’ over time. Ammonia slip is the unreacted ammonia (NH₃) that escapes from a selective catalytic reduction (SCR) or selective non-catalytic reduction (SNCR) system used to reduce NO_x in exhaust gases.

Motorways within the affected road network

There is potentially an added complexity to the need for in-combination assessments when considering traffic on motorways, as including these roads can mean that the assessment takes

account of traffic growth related to strategic factors or long range (external) trips that are independent of the specific plan or project and neighbouring plans or projects. These roads are strategically important and tend to have high volumes of traffic as well as being well represented in traffic models. The air quality assessment should therefore include traffic flows on these roads, but the external trips can be excluded from the initial screening assessment. A justification and explanation of which journeys are included and excluded in the traffic model should be provided.

The conclusions reached on the air pollution impacts of the HRA must be incorporated into the wider HRA conclusions for other impact pathways identified for the proposals.

How to Use this Advice in Decision Making

Provided you have followed the above advice and have been able to conclude there would be no adverse effects on any protected sites we would be able to agree with your decision to authorise the project

Ein cyf/Our ref: CAS-297137-F3K9
Eich cyf/Your ref: EN0710001

PeakClusterCCS@planninginspectorate.gov.uk

Dyddiad/Date: 09 February 2026

Annwyl Syr/Madam/Dear Sir/Madam,

**PLANNING ACT 2008 (AS AMENDED) AND THE INFRASTRUCTURE PLANNING
(ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 2017 (THE EIA
REGULATIONS) – REGULATIONS 10 AND 11**

**Application by Peak Cluster Limited (the applicant) for an Order granting
Development Consent for the Peak Cluster CCS Pipeline (the proposed
development)**

Thank you for referring the above proposal for a scoping opinion, which we received on 13 January 2026. Natural Resources Wales (NRW) has reviewed the information provided in the Environmental Impact Assessment – Scoping Report Volume 1 & 2, Document Reference: DOC-W05-014-Final, Prepared by ARUP and AECOM dated January 2026.

Our approach in responding to this consultation reflects the development being wholly in England therefore English statutory consultees picking up impacts relevant to English environmental constraints. Here, we provide high level comments on the approach including general advice pertaining to our remit. Should you wish to consult on specific matters we would welcome the opportunity to respond.

Please note that comments provided herein are made without prejudice to any further advice NRW may need to give, or decisions NRW may need to take, should circumstances change or new information emerge.

Protected Sites

We note that the entire redline boundary of the site lies outside Wales and therefore consider that Natural England (NE) will lead on nature conservation matters relating to this proposal. However, potential impacts on designated features within Welsh sections of relevant protected sites must be considered and reflected appropriately within the Environmental Impact Assessment (EIA) and the resulting Environmental Statement (ES).

We therefore have the following comments:

1. We recommend that the EIA and Habitats Regulations Assessment (HRA) fully include the Welsh components of the following designated sites:

- Dee Estuary Special Area of Conservation (SAC), Special Protection Area (SPA), Site of Special Scientific Interest (SSSI) and Ramsar.
 - River Dee and Bala SAC.
 - Liverpool Bay SPA.
2. We welcome the inclusion of impacts on functionally linked land for ornithology and further advise that any related effects on the Welsh elements of the Dee Estuary and Liverpool Bay SPAs are also assessed.
 3. We advise that potential water quality impacts on the above Welsh sites are fully considered, including:
 - Construction related surface water run-off -related surface water run-off
 - Works down to Mean Low Water Springs (MLWS).
 - Hydrostatic testing.
 - Operational impacts.
 4. We welcome the recognition of potential impacts on fishery receptors but would request that sediment impacts on the Dee Estuary cockle fishery be included as part of the ES.

Dee Conservancy

NRW is the Statutory Harbour Authority and Local Lighthouse Authority for the Dee Conservancy. Although the proposed construction and operational areas lie outside the Dee Conservancy boundary, NRW notes that safe navigation within the Dee Estuary remains a priority. NRW would welcome further information on the expected use of survey vessels, rigs, safety boats and other marine craft during all phases of the project. These vessels may require access to the Dee Estuary for safe mooring.

We advise you to consult the Harbour Master on any matters regarding navigation, transportation and shipping in the Dee Conservancy (estuary) region (harbourmaster@deeconservancy.org).

Cumulative Effects

We note and welcome the inclusion of the HyNet and Point of Ayr projects within Appendix I: Cumulative Effects Assessment Long List. We advise that the initial screening exercise also considers developments within the Flintshire and Wrexham council areas.

Other matters

The advice in this letter relates to matters which are included on our [consultation topics list](#). We do not rule out the potential for the proposed development to affect other environmental interests that are not included on this list.

We advise the applicant that, in addition to development consent, it is their responsibility to ensure they secure all other permits/consents/licences relevant to their development. Please refer to our [website](#) for further details.

Please do not hesitate to contact us if you require further information or clarification on any of the above.

Yn gywir / Yours faithfully,



Uwch Gyngorydd - Cynllunio Datblygu/Senior Advisor - Development Planning
Cyfoeth Naturiol Cymru/Natural Resources Wales

E-bost/E-mail: northplanning@cyfoethnaturiolcymru.gov.uk

Croesewir gohebiaeth yn Gymraeg a byddwn yn ymateb yn Gymraeg, heb i hynny arwain at oedi./Correspondence in Welsh is welcomed, and we will respond in Welsh without it leading to a delay.



To:
FAO
Planning Inspectorate

Email:
PeakClusterCCS@planninginspectorate.gov.uk

From: Town Planning Team NWC
Network Rail
1st Floor

Square One
4 Travis Street

Manchester

M1 2NY

TownPlanningNWC@networkrail.co.uk

Date: 16th January 2026

Dear [REDACTED]

EN0710001

Peak Cluster CCS Pipeline - EIA Scoping Consultation and Notification

Thank you for consulting Network Rail on the application by Peak Cluster Limited for an Environmental Impact Assessment Scoping Opinion. Network Rail has undertaken an assessment of the submitting consultation information and our current position is that there is insufficient information available to enable a full assessment of the impact on Network Rail interests at this stage.

We therefore request that the following information is included within the scope of the scheme's Environmental Statement and through parallel workstreams:

1. Detailed Location Plans

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

2. Rail Asset Impact Assessment

- Clarify how the proposed works will affect Network Rail operations and assets, including any temporary or permanent works beneath or adjacent to rail lines.

3. Property Agreements

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

4. 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

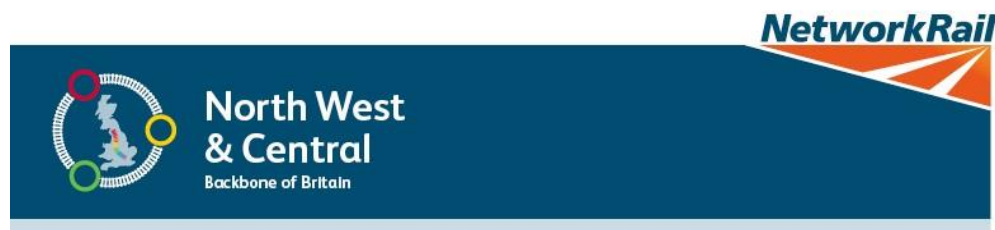
their enquiry. Enquiry will then be assigned to one of the Asset Protection team to progress. The assigned team member will then be in a position to review and comment on any submissions from the outside party).

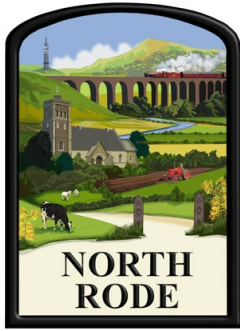
5. Regulatory Approvals

- All necessary railway regulatory approvals will be required, including Land Clearance and any other consents relevant to works near or on railway property.

From

[REDACTED]
Town Planning Technician NWC
Network Rail Property (NW&C)
Square One, 4 Travis Street, Manchester M1 2NY
Email: TownPlanningNWC@networkrail.co.uk





North Rode Parish Council

Serving the community of
North Rode

Postal Address

Colley Farm, North Rode,
Congleton, Cheshire, CW12 2PH

Phone

Tel (01260) 223247

Email

clerk@northrodepc.co.uk

9th January 2026

To Planning Inspectorate

Your Reference EN071001

Proposed Peak Cluster CCS Pipeline – consultation with North Rode Parish Council

I would refer to your correspondence to North Rode Parish Council dated 13th January 2026 in respect of the Peak Cluster CCS pipeline proposal.

Thank you for providing the opportunity to make comment.

The matter was discussed at a meeting of the Parish Council which was held on 5th February 2026.

Councillors wished the following points to be considered as part of the consultation towards the Environmental Statement:-

- How will the River Dane will be crossed and disruption to wildlife minimised?
- How will narrow and busy lanes in North Rode be crossed to minimise disruption to road users, local residents, businesses and farms?
- How will access to working farmland bisected by the working width be provided for farmers?
- What building/farming restrictions will be in place alongside and above the pipeline?
- How will access to public footpaths be maintained across the working width?
- Concerns were expressed as regards the high potential of damage to field and road drains from the works. What checks will be done as regards putting drains back correctly?
- What is the estimated dates on which the work in North Rode will be progressed?
- What is the estimated time period for disruption to take place?
- How will the work be phased?

- What size of vehicles will use the narrow lanes – particularly in relation to Church Lane and Bank Lane which are single vehicle width at certain points and currently suffer severe congestion problems at times?
- Will service 'depots' be created within North Rode land?
- What recourse will be in place if the work is not done to the satisfaction of the land owners / or problems occur thereafter?
- Will trees be removed and then replaced?

Thank you for your attention to these comments.

Yours sincerely

A solid black rectangular box used to redact the signature of the Clerk to North Rode Parish Council.

Clerk to North Rode Parish Council

From: [REDACTED]
To: [Peak Cluster CCS Pipeline](#)
Subject: EN0710001 - Peak Cluster CCS Pipeline - EIA Scoping Consultation and Notification
Date: 09 February 2026 19:00:31

You don't often get email from clerk@onecote-pc.gov.uk. [Learn why this is important](#)

Dear Sir,

After some consideration our opinion follows.

The timescale should be divided:

- a. Planning stage;
- b. Construction;
- c. Operation;
- d. Decommissioning;
- e. Residual post decommissioning

The geographic scope should identify areas impacted along the proposed route also those which are outside the route of the proposed pipeline. For instance for construction traffic it is the impact from commencement through to delivery and return that should be in scope.

The impact on the local environment should be considered together with the impact on all users of the environment for instance people, animals, invertebrates, aquatic species.

The impact of noise, light, vibration, dust and changes to the visual appearance of the landscape, impact on watercourses, increase or decrease in likelihood of flooding.

Kind regards

[REDACTED]
Clerk to Onecote Paris Council

From: [REDACTED]
To: [Peak Cluster CCS Pipeline](#)
Subject: EN070001 - Scoping Consultation for the Peak Cluster CCS Pipeline
Date: 09 February 2026 09:33:33
Attachments: [image001.png](#)

You don't often get email from [REDACTED]@orsted.com. [Learn why this is important](#)

In response to your letter, Ref EN070001, we are writing to advise that we do not consider Orsted Icení ESS (UK) Ltd to be a consultation body in relation to Peak Cluster CCS Pipeline project. To our knowledge there is no direct link between the projects.

Best regards,

[REDACTED]
Construction Manager
Onshore Construction
EPC

Tel. [REDACTED]
[REDACTED]@orsted.com



Learn more at orsted.co.uk

Chase Hill Road, Killingholme
DN40 3LU North East Lincolnshire

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Specific Comments on Section 10: Historic Environment of Scoping Report Volume 1

10.3 Defining the Study Area

Para 10.3.7 confirms that a "study area of 1km from the draft Order Limits (once established) in relation to below ground components of the Proposed Development will be taken forward for assessment in the EIA".

Para 10.3.8 confirms that for "above ground components of the Proposed Development, an initial study area of 2km is proposed to be taken forward for assessment in the EIA, and a wider study area of up to 5km will be proposed for assets beyond the 2km study area that are highly sensitive to change as a result of the Proposed Development".

Response: at **para 10.7.17**, it states: "Taking into account the historic baseline information collated for this Scoping Report, the following study areas will be taken forward for assessment in the EIA:

500m from the draft Order Limits (once established) in relation to below ground components of the Proposed Development".

This is reiterated at **para 10.8.3**.

This is a reduction of 500m and at odds with the 1km study area identified for inclusion in the EIA at **para 10.3.7** for below ground components of the Proposed Development. No explanation or justification for this is provided in either **Section 10.3** or **10.7** or in the accompanying baseline information at **Appendix H**. As per **para 10.3.9**, we agree that study areas must be agreed following further consultation with LPAs (including the PDNPA), after further examination of the ZTV studies, and further design development.

No study area has been confirmed for the identification or assessment of Non-Designated Heritage Assets (NDHAs) or other non-statutory heritage assets. Confirmation of study area for assessment of the Proposed Development on NDHAs/non-statutory heritage assets should be provided.

10.4 Baseline Environment

NDHAs have not been identified through the scoping exercise. **Para 10.7.14** confirms that NDHAs "have not been presented in this chapter. Information for these assets will be requested from the relevant Historic Environment Records (HER) and incorporated into the assessment presented within the DBA, PEIR and ES".

Response: Liaison with the PDNPA will be expected to ensure the study area and scope of assessment for NDHAs and other non-statutory heritage assets is proportionate to the potential impact of the Proposed Development.

The PDNPA should be formally consulted for historic environment data as well the relevant HERs as we hold additional datasets, including particularly important information on leadworking sites/landscapes which includes below ground and upstanding remains at a landscape scale. The PDNPA consider many of these sites to be of equivalence significance to formally designated Scheduled Monuments. There will be a charge for our data sheets.

Under the heading 'Future Baseline', **para 10.4.6** states "there is unlikely to be any change to the historic environment baseline conditions described in the previous section".

Response: Whilst it is acknowledged that this is in reference to designated heritage assets only (given NDHAs are not identified as part of the scoping exercise), there is no consideration given to the potential future historic environment baseline within the context of NDHAs. This is particularly

relevant given the likelihood for significant effects at the Breedon site, Hope Cement Works, which was subject to a review for inclusion on the NHLE as a Registered Park and Garden in 2020 (further comment provided below).

There is no methodology (either in **Section 10.4** or in **Section 10.7**) provided to explain how changes to the baseline in the future might affect the potential effects of the Proposed Development on the historic environment (including both designated and non-designated heritage assets) or how they would be assessed within the EIA.

10.5 Planned Surveys

Table 10-5: Scope of Proposed Development Surveys establishes that a ‘Heritage Walkover Survey’ will be conducted, comprising “*site visits to view relevant designated and non-designated assets and identify additional assets not recorded in existing datasets*”.

Response: What is the planned scope of this survey? Does it comprise systematic coverage of the whole scoped extent? A methodology for this survey should be provided.

10.6 Identification of Potential Effects

Para 10.6.9 states that “*Embedded Mitigation will be built into the Proposed Development to minimise impacts to heritage assets and their setting, as far as possible, with particular consideration given to the listed buildings and known archaeological sites located within the Scoping Boundary.*”

Response: whilst the identified receptors should receive full consideration through the embedded mitigation (and, if necessary additional mitigation) of the Proposed Development, a similar level of consideration should likewise be applied to mitigating any potential significant effects on other designated heritage assets, including Conservation Areas and RPGs (particularly given the potential impact on the Grade II* RPG and Conservation Area of Lyme Park), and NDHAs.

10.7 Scope and Methodology

Para 10.7.3 identifies the data sources that will be used for desk-based research.

Response: Data sources should also include the PDNPA HER (see also **para 10.7.14**).

Table 10-6 contains the criteria for determining the value of heritage assets.

Response: There are some queries about the categorisation of different heritage assets within this table. For example, NDHAs (of “*demonstrable national or international importance*”) are included within the ‘High’ category, however there is no allowance for Grade II listed buildings of demonstrable national or international importance to be included within this category.

We also query the meaning of the language used in the ‘Medium’ category to describe “*averagely preserved historic landscape character areas*” and “*historic townscapes with historic integrity in that the assets that constitute their make-up are clearly legible*”. These definitions of heritage assets are unclear and confusing.

Further, more detail/clarification should be provided between different types of significance embodied by Conservation Area designations. Within the PDNP, Officers consider most Conservation Areas to be of High significance.

We would advise a review of the contents of this table to ensure the contents and distinctions between different categories are clear.

Table 10-7 contains the criteria for determining the magnitude of impact of the Proposed Development on heritage assets.

Response: Whilst it is accepted that the language used to determine impacts is aligned with EIA methodology/terminology, it would be useful for this section to include an explanatory statement of how these effects (in EIA terms) relate to levels of harm defined within the language of the NPPF (i.e. substantial, less than substantial).

Similarly, there should be consistent terminology used for defining the special interest of an asset, i.e. either 'heritage value' or 'significance'.

Under the heading 'Consultation', **para 10.7.12** states that *"engagement with Historic England and relevant Archaeological Advisors for Local Planning Authorities should be undertaken to confirm the scope of the historic environment Desk-based Assessment and heritage surveys."*

Response: Consultation with LPAs should include Built Environment officers.

General Comments

Chapter Structure/Technical Consultant

If Historic Environment is to be addressed in a combined chapter, it is essential that the assessment is prepared by technical consultants suitably qualified in both archaeological and built environment impact assessments.

The EIA may benefit from the disciplines being divided into separate chapters prepared by suitably qualified technical consultants and for ease, given the predicted scale of both impact assessments.

Views and Visual Impact Assessment

Within the methodology, there is no reference to how views / a Visual Impact Assessment might be utilised to understand potential significant impacts on heritage assets. The initial ZTV studies illustrate potential visibility from numerous sensitive historic environments, affecting listed buildings, RPGs, Conservation Areas, Scheduled Monuments and NDHAs and / or the setting of these assets. Views which are useful for identifying and assessing potential impacts on above ground heritage assets should be identified within the EIA and utilised as part of the Historic Environment assessment.

Initial viewpoints / broad viewpoint locations (informed by initial ZTV studies and other landscape and environmental conditions) have been identified in a series of maps at **Appendix B**. Whilst it is expected that viewpoint locations will be subject to further consultation and agreement with statutory bodies and refinement subject to further design evolution, from an initial review there are a number of highly sensitive historic environments (including individual heritage assets and settlements) which are not presently represented in the viewpoint study. Within the PDNP, broad areas of visibility from settlements not represented by a viewpoint include: Hathersage, Bamford, Chelmorton, Cressbrook, Onecote, Wetton, Upper Elkstone, Calton, and Great Hucklow. There is likely to be other, more remote / non-settlement locations which are of important heritage consideration which may also be underrepresented in the views study.

The viewpoint selection will be expected to be subject to a degree of careful scrutiny to ensure the assessment includes those views which aid an understanding of potential impacts on heritage assets within the PDNP.

Mapping

Please can the PDNP boundary be added to all the relevant maps/figures in **Appendix B**.

Where designated assets straddle study area boundaries (i.e. the 5km boundary), please include the map the full extent of the designation. For example, the boundary identifying Hathersage Conservation Area is missing on **Figure 10.1B**, whilst others including Foolow and Edale Conservation Area boundaries and several Scheduled Monuments have only been partially mapped where they fall within the study area. Please ensure this is applied across all figures mapping heritage assets (designated and non-designated).

Initial Principal Heritage Concerns

Lyme Park

Given the developing nature of the design details which are the subject of the Proposed Development, the PDNPA does not have a fully informed or detailed understanding of the likely significant impacts on the Historic Environment within the PDNP or its setting (and the likelihood of potential individual effects is not set out in the Scoping Report).

Notwithstanding this, it is clear that the Proposed Development in its current form (which includes two options for routing the pipe through/on the outskirts of Lyme Park) has the potential to result in a significant adverse impact on the heritage assets within Lyme Park, particularly Lyme Park Conservation Area and Lyme Park Grade II* RPG, as well as potentially affect the setting of a number of listed buildings within the parkland, including the Grade I Lyme Park (principal hall) and Grade II* Cage, amongst others.

The potential impacts on Lyme Park, the mitigation of such impacts and their assessment within the EIA should be a foremost consideration of the Historic Environment assessment.

Hope Cement Works

History/Context: The Hope Cement Works was established in 1929 by G. and T. Earle. In 1942, George Earle commissioned the esteemed landscape architect, Geoffrey Jellicoe, to develop a landscape strategy/programme of intent that would be used to influence the evolution and development of the quarry within the landscape (soon to be designated as a National Park). The plan was further developed in turn by Sheila Haywood (formerly Jellicoe's assistant), who continued the supervision of the landscape and was succeeded in turn by John Windsor (formerly Haywood's assistant) and David Jarvis (formerly Windsor's assistant).

RPG Designation Review: Hope Cement Works was the subject of a review by Historic England (in partnership with The Gardens Trust) in 2020 for inclusion as a Registered Park and Garden on the NHLE as part of a national project reviewing post-war landscapes. A Designation Report prepared by Historic England (18 August 2020) summarised their recommendation that the site not be registered owing to its status as an active quarry and to not consult on the assessment for the same reason. It was considered, given ongoing limestone and shale quarrying and processing, and valid permissions for these activities until 2042 (with the final extent and content of the quarry, and outcome of Jellicoe's strategy, unknown until the cessation of these activities) that registering the site would not be appropriate at the time.

Historic England's Designation Report concludes by stating that at the point at which extraction at the site ceases (in 2042), Hope Cement Works will be a "*static landscape*" with "*clearly defined boundaries*" and can subsequently be "*examined as a complete project*".

Historic England summarises the context for the consideration of the site:

"Industrial landscapes are seldom recognised as being of special interest per se, as, in most instances, landscape design is used as a means of hiding what is considered to be the negative impact of, for instance, power stations or car factories on their surroundings. This too was the imperative for the landscaping interventions at the Hope site, but its location, in a landscape of exceptional quality soon to be recognised as England's first National Park required much more than a landscape design. Jellicoe's suggested approach was to develop a strategy for mitigating the effects of a massive limestone quarrying and processing operation in a highly sensitive location, which would require adjustments as the extraction of materials continued decade after decade. The strategy recommended by Jellicoe has shaped the ongoing management of the site as the quarry advances westwards, and will hopefully continue to do so for the duration of the quarrying permission."

"The final report, completed in November 1943 was the first 50 year plan for a quarry in England, and marked a way forward for the landscaping of very large industrial concerns and the transformation of the landscape profession away from the design of parks and gardens".

Future Considerations:

Historic England's Designation Report highlights the potential that Hope Cement Works could be subject to a secondary review for designation as an RPG upon the cessation of its activities. Given there is no certainty that the site would become a designated heritage asset, it is not anticipated that Hope Cement Works would be treated as part of a Future Baseline assessment scenario within the EIA, however the significance of the Site (which, even if not identified to be of a national level by Historic England would be of considerable local/regional importance) and the potential impact of the Proposed Development on the landscape it embodies should form part of the forthcoming Historic Environment assessment.

Peak Cluster Scoping Opinion – Access & Recreation

The proposed scoping as provided may not adequately consider the likelihood of significant impacts on access and recreation. A separate section on access & recreation is recommended, in view of the proposed location within and surrounding the Peak District National Park, and the statutory purpose for promoting understanding and enjoyment and duty to promote the economic and social wellbeing of its communities.

The scoping report notes that recreation and tourism will be covered in the socio-economic sections, but also addressed elsewhere in the context of: visual impact on the population and users, transport impact on access and routes, noise on users of routes, and for amenity effects. It is considered that a separate section on access & recreation will draw this together to allow for adequate assessment of the environmental, economic, and social impact on all public access resources and opportunities for use by residents and visitors within and adjoining the Peak District National Park.

Relevant plans include:

- The emerging Local Plan Preferred Options
- The Peak District Walking, Wheeling, Cycling and Horse-riding Infrastructure Plan

The detailed assessment of routes/spaces is not provided at this stage, but should include:

- Public Rights of Way
- Access Land
- Active Travel Strategic Network
- Pennine Bridleway National Trail
- Promoted routes – Limestone Way, Gritstone Trail
- Claimed routes
- Permissive routes
- Recreational sites

To establish the baseline:

- Identify recreational opportunities that may be affected
- Determine users, activity types and levels of usage
- Consider travel distances and the network connectivity
- Undertake value assessments.

Consider the extent of changes in the amenity or recreation resource/receptors relating to:

- Permanent/temporary closure/diversion
- Loss/gain of amenity
- Existence of equivalent recreational opportunities
- Displacement of activities
- Enhancement

This approach can support the tourism study proposed in the socio-economic section.


Access & Rights of Way Officer

Internal Consultation Response relating to:

Peak Cluster, Scoping Opinion Request

Comments on Scoping Report, Section 10: Historic Environment.

-

To: [REDACTED], Strategic Planning Manager

Date: 30/01/2026

Detailed comments

The Historic Environment is covered in Section 10 of volume 1 of the Scoping Report, but it only considers designated heritage assets. It does however make provision for non-designated heritage assets, historic landscape character and other historic environment records to be considered as part of the Preliminary Environmental Impact Report (PEIR).

I agree that impact on archaeology, heritage assets and cultural heritage needs to be scoped into the EIA.

I agree that the assessment needs to include consideration of temporary construction impacts; permanent construction impacts; impacts from the operational phase and from decommissioning, as all have the potential to cause harm to the historic environment.

I welcome the consideration of all forms of mitigation, including works to remove/avoid or minimise harm (micro siting, route refinement etc.). This should be the default, and any impacts that can be designed out, should be designed out.

I broadly agreed with the broad scope of the future work and assessments proposed to contributed to the relevant chapter of the ES, but subject to the following detailed comments below.

Comments:

- Relevant legislation para.10.2.1 Table 10-1 - should the National Parks Act (1949), Environment Act (1995) and the protected landscapes duty in Levelling Up and Regeneration Act (2023) to be added for the PEIR and ES stage.
- Relevant policies – table 10-2 and para.10.7.5 only includes PDNPA Local Development Framework (2011) not the development management policies (2019), which is missing from the list and needs to be added and considered for the to be added for the ES stage.
- Standards and guidance – table 10-4 I would also add to this for the PEIR and ES stage Historic England's specific guidance on peats and peatland management, particularly the guidance around assessing the resource, appropriate survey and techniques, deposit modelling, assessing the state of preservation, under hydrogeology etc. [Guidance for Carrying out Peat Restoration: Assessing the Resource | Historic England](#)

- Proposed study area- para.10.3.5-10.3.9 – agree with the proposed areas and extents outlined subject to review following production of ZTV. But this differs to what is set out at para.10.7.16 with respect to belowground components. It states 1km at para. 10.3.7 and only 500m at 10.7.17 and para.10.8.3. I strongly advocate for the 1km from the draft order limits for the assessment area.
- Planned surveys to inform PEIR and ES chapters – table 10-5:

Walkover surveys – we need to know more about the proposed methodology and scope for this? Will it be systematic coverage the full extent of the scoping and assessment area; just immediately on the route; or will it really be a short visit to support the DBA. I advocate for proper systematic walkover survey across the whole extent. The nature and scope this would be very different depending on landscape context and nature of known/predicted archaeological resource e.g. improved agricultural fields vs. unimproved or moorland sites with peats that might need targeted focus of walkovers on areas of erosion, hags, water course and grips or gullies.

Non-invasive surveys – geophysics is planned, on ‘suitable and accessible land’. I would suggest range of non-invasive surveys should be extend to include geochemical and UAV surveys to provide a more complete picture, particularly as trial trenching is proposed significantly later in the programme. This has been used successfully to help inform approach to intrusive evaluation on other large scale development sites in the National Park (quarry sites) and as part of HS2.

Geologies that are not responsive to the more widely used geophysical techniques also need to be considered. Carboniferous limestone offers mixed and sometime unreliable results to magnetometry. Difficulties on geophysics on peats. Alternative or additional/supporting methods of assessment will be needed.

If the route includes ploughed and arable fields, then fieldwalking should be considered as pre-trial trenching evaluation technique.

Paleoenvironmental and Geoarchaeological Assessment - this needs to take place alongside the initial surveys and the desk based assessment so that it can inform the PEIR and the ES chapter, targeted at areas of known peat or potential peaty soils (Natural England's peat map provides a rough indication). It should follow Historic England guidance on assessment of the peat resource (link provided already above) and should highlight the archaeological interest and potential and the need .for further sampling and surveys at evaluation stage

Trial trenching – the report mentions that this will be ‘targeted’ but not how it will be targeted, and it states it will only take place along the pipeline corridor where it interacts with ‘significant archaeology’.

It is not clear what significant means in this context, because the very purpose of archaeological evaluation, including trial trenching is to characterise the nature, state of preservation and significance of the archaeological resource. Trial trenching cannot target ‘significant archaeology’ when its is design to help define and understand significance.

It needs to include areas of the direct pipeline corridor where direct physical impacts will take place e.g. compounds, laydown areas, storage areas, temporary roads and tracks, temporary car parks.

It also must include targeting of blank area also; to test where direct impacts are predicted as outlined, but it also needs to also test areas that appear to be absent of archaeology to evaluate the success of the evaluation techniques in correctly identifying areas of archaeological interest and potential, and what it may have missed.

- Potential Effects – para. 10.6.5 – this should explicitly include paleoenvironmental remains also.
- Mitigation options- para.10.6.10 also needs to explicitly include the provision open-area excavation, paleoenvironmental and geoarchaeological sampling (buried soils, coring etc.).

It also needs to consider where enhancements or compensatory measures can be delivered such as interpretation and dissemination (offsite, onsite, remote, online); conservation benefits that can be delivered along the route.

- Historic Environment Data- para.10.7.3 – needs to include consultation of the PDNPA HBSMR. Whilst we are not a formal HER we do hold a number of data sets in addition to the HER and which will be required for assessment of the historic environment to take place. Of particular interest and value are the Lead Mining data sets, that include sites and landscapes of regional and national significance; PDNPA's Historic Landscape Characterisation data and our knowledge of Aerial Photo sources available for our area.

Similarly, the National Trust's records also need to be consulted, as one of the proposed routes passes through Lyme Park.

Historic England's National Mapping Programme data would also be essential, as it includes many features already identified through LiDAR and Aerial Photo analysis.

- Receptor Value – para.10.7.9, Table 10-6 – all nationally designated heritage assets should be considered of high value. Grade II listed buildings and grade II registered parks and gardens contribute are designated because of their national significance and contribute to national research objectives.

Consideration also needs to given to heritage assets within the National Park, these do not just have their own intrinsic significance; they contribute to the Special Qualities of a nationally designated protected landscape, as described in PDNPA's management plan. The environmental assessment must have regard to our special qualities and the contribution of heritage assets to them.

- Magnitude of impact – para. 10.7.10, table 10-7 – the terms and values used should follow or at least echo and be attributable to the levels of harm defined in NPPF and it's supporting guidance e.g. *substantial*, *less than substantial*.
- Maps and drawings - National Park boundary should be on all relevant figures produced for the PEIR and ES. Where assets (designated or otherwise) fall partly within the boundary of the assessment area, the full extent of that asset needs to be mapped; the maps currently chop off any extent of the assets that fall outside of the study area.

From: [REDACTED]
Sent: 03 February 2026 14:30
To: [REDACTED]
Subject: RE: EIA Scoping Opinion Consultation - Peak Cluster DCO | Ref: 0126/0039

Hi [REDACTED]

Sorry for the delay in responding.

On the document itself, I have only look at Traffic & Movement, not Air Quality or noise & vibration. I mention this because I dealt with all 3 chapters for the A57 Link Roads and Mottram-Tintwistle bypass schemes...let me know if you want me to take a look.

Firstly, there are a lot of unknowns on the traffic side of things, basically a lot of the Chapter in the scope is to be determined as the scheme is further developed. The EIA or ES. Transport Assessment etc will provide this as we go forward.

I have picked out a small number of things in Traffic & Movement: -

Table 8-2: Traffic and Movement – Policy – needs to include reference to the Core Strategy, particularly Policies T1 and T2.

Table 8-4: Traffic and Movement – Breedon Capture Facility – incorrectly states that Castleton is located to the east of the site and Hathersage to the west; it's the other way round.

Under A57, it is worth noting that there is currently a 7.5 tonne weight limit on the road between it's junction with the A6013 Ladybower and Glossop.

Paragraph 8.6.37 – the Peak District NPA should also be consulted on the EIA.

I hope that this is helpful

Thanks

[REDACTED]

[REDACTED]

Transport Policy Planner

[REDACTED]

[REDACTED]@peakdistrict.gov.uk

From: [REDACTED]

Sent: 15 January 2026 14:49

To: [REDACTED] Ecology Consultation

<ecologygrp@peakdistrict.gov.uk>; [REDACTED]

[REDACTED]

[REDACTED] BuiltEnv <builtenv@peakdistrict.gov.uk>

Cc: [REDACTED]

[REDACTED]

[REDACTED]

Subject: EIA Scoping Opinion Consultation - Peak Cluster DCO | Ref: 0126/0039

Importance: High

**PLANNING ACT 2008 (AS AMENDED) AND THE INFRASTRUCTURE PLANNING
(ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 2017 (THE EIA
REGULATIONS) – REGULATIONS 10 AND 11**

**APPLICATION BY PEAK CLUSTER LIMITED (THE APPLICANT) FOR AN ORDER
GRANTING DEVELOPMENT CONSENT FOR THE PEAK CLUSTER CCS PIPELINE (THE
PROPOSED DEVELOPMENT)**

EIA SCOPING OPINION REQUEST

Dear All,

On Tuesday (13th January) we received a formal EIA Scoping Opinion consultation letter from the Planning Inspectorate in regards the Peak Cluster CCS project, which includes a CO₂ transit pipeline and carbon capture infrastructure at 4 emitter sites, 1 (Hope Cement Works) of which is within the National Park, with the other 3 being located in close proximity to the National Park boundary (2 at Tunstead Works, 1 at Cauldon Low).

The proposed development is a Nationally Significant Infrastructure Project (NSIP), as defined in the Planning Act 2008 (as amended). A summary of the NSIP planning process can be found at the following link:

<https://www.gov.uk/guidance/nationally-significant-infrastructure-projects-the-stages-of-the-nsip-process-and-how-you-can-have-your-say#preapp>

The proposed development is currently in the pre-application stage.

Environmental Statement (ES) and the scoping process.

To meet the requirements of The EIA Regulations, applicants are required to submit an ES with an application for an order granting development consent for any NSIP likely to have a significant effect on the environment. An ES will set out the potential impacts and likely significant effects of the proposed development on the environment. Schedule 4 of The EIA Regulations sets out the general information for inclusion within an ES.

The applicant has asked the Planning Inspectorate on behalf of the Secretary of State for its written opinion (a Scoping Opinion) as to the scope, and level of detail, of the information to be provided in the ES relating to the proposed development. The applicant has set out its proposed scope of the ES in its Scoping Report which is published on the 'Find a National Infrastructure Project' website:

<https://national-infrastructure-consenting.planninginspectorate.gov.uk/projects/EN0710001/documents>

Before adopting a Scoping Opinion, the Planning Inspectorate must consult the relevant 'consultation bodies' defined in The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 (as amended). The Planning Inspectorate has identified the Peak District National Park Authority as a consultation body which must be consulted before adopting its Scoping Opinion. The Planning Inspectorate has requested that the PDNPA

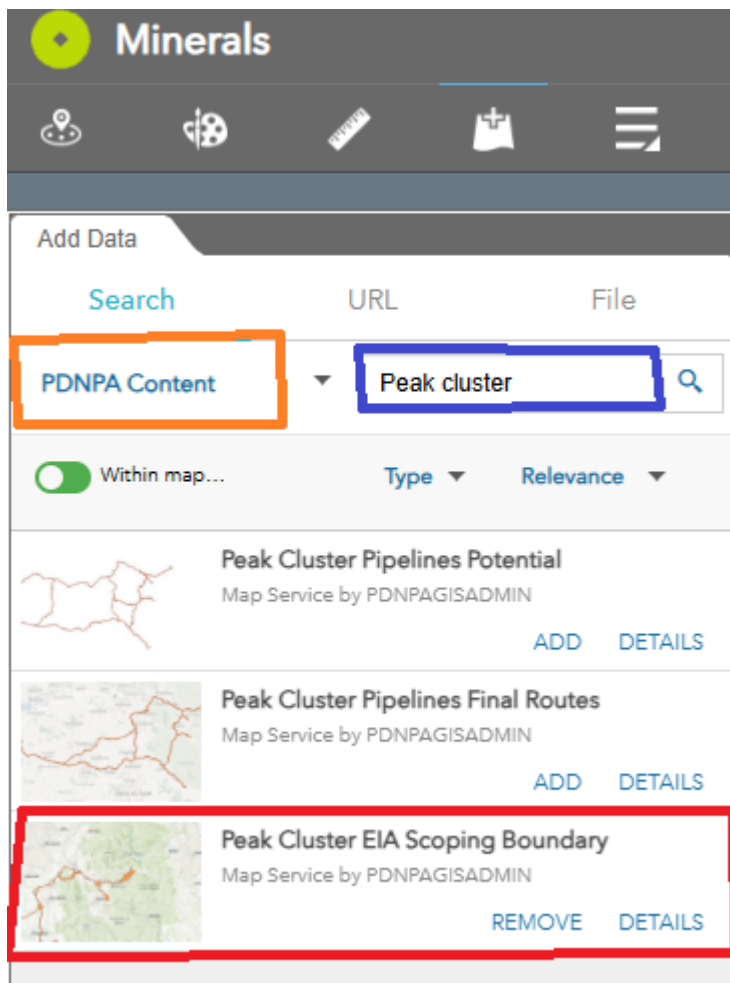
- inform the Planning Inspectorate of the information we consider should be provided in the ES, or
- confirm that we do not have any comments

As the such I am writing to request your advice regarding the scope of the ES relevant to your specialist area so that the PDNPA can form a Scoping Response which will assist the Planning Inspectorate in forming their own statutory Scoping Opinion in regards the proposed development.

The PDNPA must respond to the planning inspectorate by 10 February 2026, or it will be considered to not have any comments to make.

As such you are requested to provide a response to this e-mail no later than 30 January 2026 to allow me the time to collate a strategic response and provide it before the Planning Inspectorates deadline. If a response is received after 30 January 2026, it may not be included in the strategic response.

The documents (they are considerable) are available via the link above, but in order to assist further Mark has added the proposed route corridors to the Mapping Portal. You can add them as a layer by selecting the options highlighted below (and entering 'peak cluster' into the search box).



Please make any observations on the proposed scope of the Environmental Statement required to accompany the development consent order submission to me by return e-mail no later than **Friday 30th January 2026**.

If you have any queries please feel free to contact me.

Best regards,

[Redacted]

[Redacted]

Strategic Planning Manager

[REDACTED]

[REDACTED]

[\[REDACTED\]@peakdistrict.gov.uk](mailto:[REDACTED]@peakdistrict.gov.uk)

EIA Scoping Opinion Consultation request from the Planning Inspectorate in regards the Peak Cluster CCS NSIP to inform DCO submission.

Ecology Response.

Date: 3rd February 2026

Summary

The applicant has asked the Planning Inspectorate on behalf of the Secretary of State for its written opinion (a Scoping Opinion) as to the scope, and level of detail, of the information to be provided in the ES relating to the proposed development. The applicant has set out its proposed scope of the ES in its Scoping Report which is published on the '[Documents | Peak Cluster CCS Pipeline](#)'

It is considered that the proposed scope is sufficient to ensure that impacts are assessed at preparatory, construction and operational phases of the development.

Recommendations for avoidance, mitigation, compensation and enhancement measures will be proposed to minimise any adverse effects on these identified ecological features. Where necessary, the significance of any residual effects will be assessed. Examples of potential mitigation approaches are described; however, agreed mitigation proposals will be detailed within the EclA.

Planning policies and guidance

Relevant national, regional and local planning policies and guidance are cited and it is acknowledged in the document that those listed are not exhaustive. For instance,

BS 42020 Biodiversity: Code of Practice for Planning and Development should be included in Table 6.3.

We direct the applicant to the Peak District National Park's Nature Recovery Plan [The Peak District | Nature Recovery Plan](#). Although not a statutory document, it identifies priority habitats, species and ecological networks in the Peak District. It can be used to ensure that avoidance, mitigation and enhancement measures contribute to strategic nature recovery objectives.

Biodiversity Net Gain becomes mandatory for NSIPs in **May 2026**, subject to the confirmed government timeline. BNG considerations should begin at the early design stage. Off-site units, geographic offset requirements and habitat availability often need to be confirmed well in advance of Examination and DCO submission. We therefore welcome the fact that early engagement has taken place with regional and national stakeholders to discuss potential strategies to deliver BNG, (including Nature North, Natural England, EA, Cheshire Wildlife Trust and Derbyshire Wildlife Trust); and encourage the applicant to engage with the Authority as well.

Zone of influence

The defined study area and potential ZOI has been identified up to 15 km. The distance has been determined based on 'professional judgement and experience of other similarly scaled projects and should be sufficient in which to assess all possible effects on ecology and biodiversity.' We generally agree and the distance aligns with guidance from CIEEM (2024) ensuring all likely significant effects are assessed. However, more detailed justification for the ZOI for each

receptor should be provided in the EcIA. For example, potential impacts from noise, light/air pollution may influence receptors at greater distances.

A desk study will identify European statutory designated sites within 15 km of the Scoping Boundary, seeking to address potential effects upon their qualifying features particularly those such as mobile species e.g. birds or bats (where the search area may be extended to 30 km).

An initial study of the biodiversity baseline environment has been undertaken through desk-based research using relevant resources. It is understood that a more detailed desk study of the baseline biodiversity environment will be undertaken for the Preliminary Environmental Information Report (PEIR) and to assist in planning the surveys required for the EcIA.

The Priority Habitat Inventory (PHI) maps will be used to locate priority habitats. We request that the applicant consults the authority to determine if any additional areas of habitat that meet the criteria for priority habitat, but which are not currently on the inventory, may be impacted by the proposals. For instance, the priority habitats map does not currently fully reflect the number of traditional hayfields in the Peak District National Park. We are aware that a number of potentially impacted fields have been considered for SSSI designation.

Identification of Potential Effects

The scoping report identifies that the Proposed Development has the potential to result in effects on biodiversity features as set out within Tables 6.10 – 6.12 of the scoping report. The potential environmental effects will be assessed within the subsequent ES for the construction, operational and decommissioning phases of the Proposed Development.

The scoping report suggests that any significant adverse effects will be mitigated or compensated for, whilst ecological enhancements may be recommended where appropriate to meet planning policy objectives.

Conclusion

We are satisfied that the scope of the ES as detailed within the Scoping Report has adequately identified likely significant effects and is suitable to ensure potential ecological impacts are addressed; including adherence to avoidance-mitigation-compensation hierarchy.

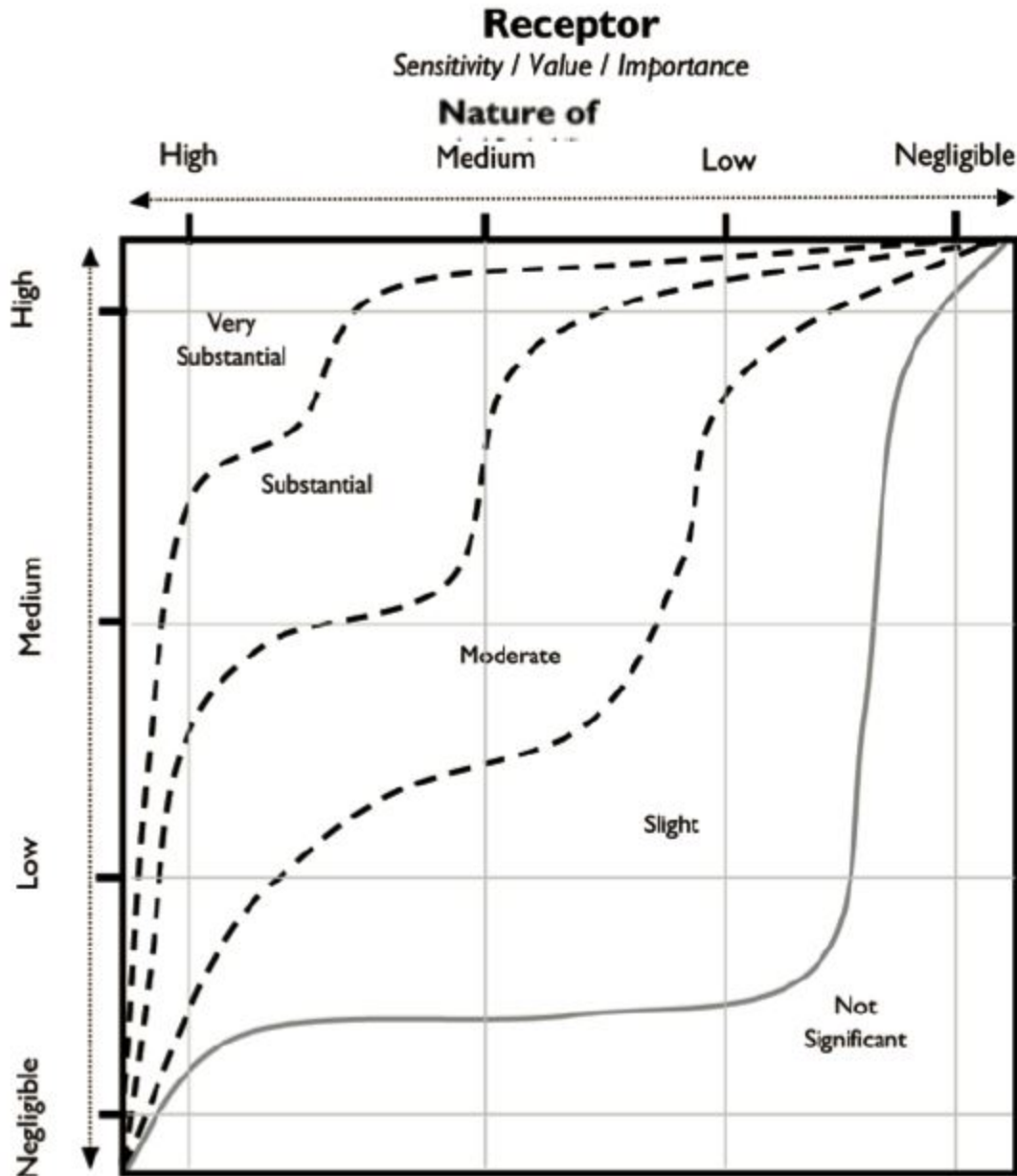
However, we request that the applicant consults the authority to determine if any additional areas of habitat that meet the criteria for priority habitat, (but which are not currently on the Priority Habitat Inventory), may be impacted by the proposals.

Any conflicts with National Park purposes should be suitably mitigated, including (but not limited to) consideration of Natural Zone policies and a Habitat Regulations Assessment if relevant.

We encourage the use of the Peak District Nature Recovery Plan to ensure alignment with local nature recovery priorities consistent with national policy.

Nature of Effect

Magnitude / Probability / Reversibility, etc



Peak District National Park Authority
Tel: 01629 816200
E-mail: customer.service@peakdistrict.gov.uk
Web: www.peakdistrict.gov.uk
Aldern House,
Baslow Road,
Bakewell,
Derbyshire,
DE45 1AE



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

Your ref: EN0710001
Our ref: NP/DDD/0126/0039
Date: 10th February 2026

By E-mail Only

Response to statutory EIA Scoping consultation

Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (The EIA Regulations) – Regulations 10 and 11

Application by Peak Cluster Limited (the applicant) for an Order granting Development Consent for the Peak Cluster CCS Pipeline (the proposed development)

The proposed development is a Nationally Significant Infrastructure Project (NSIP), as defined in the Planning Act 2008 (as amended). The applicant (Peak Cluster) has asked the Planning Inspectorate on behalf of the Secretary of State for its written opinion (a Scoping Opinion) as to the scope, and level of detail, of the information to be provided in the ES relating to the proposed development.

The Planning Inspectorate has identified the Peak District National Park Authority (PDNPA) as a consultation body which must be consulted before adopting its Scoping Opinion. The PDNPA has considered the Scoping Report prepared by Peak Cluster and outlines the matters it considers should be included in any Environmental Statement that may be prepared to accompany a Development Consent Order (DCO) application.

It should be noted that the comments are made relate to the specialisms of the National Park Authority and it is trusted that the comments of other statutory consultees in regards their specialist technical areas will be taken into account by the Planning Inspectorate when adopting the final Scoping Opinion.

Member of National Parks UK

Holder of Council of Europe Diploma



Chief Executive: [REDACTED]

Chair: [REDACTED] Deputy Chair: [REDACTED]

Working together for the Peak District National Park:

• To speak up for and care for the Peak District National Park for all to enjoy forever •

Information we hold may be disclosed under the Freedom of Information Act and the Environmental Information Regulations. Our Privacy Notice tells you about how we use, manage and store your personal information in line with the General Data Protection Regulation and DPA 2018. The Notice is published on our website or you can obtain a copy on request

INFORMATION TO BE INCLUDED IN AN ENVIRONMENTAL STATEMENT

1. Legislation and Planning Policy

National Park Purposes

Section 5(1) of the National Parks and Access to the Countryside Act 1949 defines the purposes for which National Parks were established:

‘(a) of conserving and enhancing the natural beauty, wildlife and cultural heritage of the areas specified in the next following subsection; and

(b) of promoting opportunities for the understanding and enjoyment of the special qualities of those areas by the public.’

Section 5(2) states the reasons for the Park’s designation as being of:

‘(a) their natural beauty, and

(b) the opportunities they afford for open-air recreation, having regard both to their character and to their position in relation to centres of population.’

The Levelling Up and Regeneration Act 2023 (LURA) was brought into statute on 26th October 2023. A key aspect of the legislation in relation to National Parks is Section 245: Protected Landscapes. This section amends Section 11A of the National Parks and Access to the Countryside Act 1949 such that:

*‘In exercising or performing any functions in relation to, or so as to affect, land in any National Park in England, a relevant authority other than a devolved Welsh authority **must seek to further the purposes** specified in section 5(1) and if it appears that there is a conflict between those purposes, must attach greater weight to the purpose of conserving and enhancing the natural beauty, wildlife and cultural heritage of the area comprised in the National Park.’*

A “relevant authority” means— (a) any Minister of the Crown, (b) any public body, (c) any statutory undertaker, or (d) any person holding public office.

Where previously a relevant authority was required to ‘have regard’ to national park purposes, they are now required to ‘further’ national park purposes. Given that the Peak Cluster project is to be funded through Government backing (National Wealth Fund), the developer is considered to be a ‘relevant authority’. **In addition, PINS, and the Secretary of State as ultimate decision maker in regards NSIPs, are considered a ‘relevant authority’. As such, the project must further the purposes of the National Park in order to meet the legal requirement of the LURA 2023.**

It is important that the scope of the Environmental Statement recognises this in the legislation and policy section and the submission itself delivers on the requirement to further the purposes of the National Park. Should it not, any decision would be open to legal challenge.

National Park Special Qualities

The ES should recognise the special qualities of the National Park as defined in the National Park Management Plan 2023-2028 when considering the likely significant effects of the development. The special qualities are defined as:

1. Beautiful views created by contrasting landscapes and dramatic geology

2. Internationally important and locally distinctive wildlife and habitats
3. Undeveloped places of tranquillity and dark night skies within reach of millions
4. Landscapes that tell a story of thousands of years of people, farming and industry
5. Characteristic settlements with strong communities and traditions
6. An inspiring space for escape, adventure, exploring and quiet reflection
7. Vital benefits for millions of people that flow beyond the landscape boundary

PDNPA Development Plan

Core Strategy Development Plan Document – Adopted October 2011

Development Management Policies (Part 2 of the Local Plan for the PDNP) – Adopted May 2019

Emerging Planning Policy

[Local Plan Review: Peak District National Park](#)

The Authority is currently undertaking a review of the Development Plan and has recently conducted a Regulation 18 consultation on a preferred approach including draft policies and draft policy positions. It is anticipated that a formal Regulation 19 consultation will be undertaken in the summer of 2026 and it is expected that the draft Plan will be submitted to the SoS before the end of 2026. As such, it is not unreasonable to expect that the PDNPA will have adopted a new development plan by the time the Peak Cluster NSIP project is subject to examination. It is therefore advised that the developer follows the progress of the Local Plan Review and seeks to ensure emerging policy is considered as part of the Environmental Statement.

Other relevant PDNPA Policy

The PDNPA 'Landscape Strategy' 2022-2031

National Park Management Plan 2023-2028

The Peak District Walking, Wheeling, Cycling and Horse-riding Infrastructure Plan

2. Landscape, Landscape Character, Visual Impact Assessment

The Environment Act 1995 states that UK National Park Authorities have two statutory purposes: to conserve and enhance the natural beauty, wildlife, and cultural heritage, and to promote opportunities for public understanding and enjoyment of their special qualities.

Section 245 LURA 2023 places an enhanced duty of relevant bodies, of which the Planning Inspectorate is one, and also the developer due to receiving government funding for the project; to 'seek to further' the statutory purposes of Protected Landscapes. As such, the scope of the ES should include provision to assess any enhancements that the project proposes to deliver in order to further National Park purposes.

The PDNPA 'Landscape Strategy' 2022 – 2031 is the 3rd core planning document for the PDNPA. This is especially relevant with regard to landscape designations and consideration of

landscape character in and adjoining the PDNP. It is important that the information for both Landscape Character Areas (LCAs) and Landscape Character Types (LCTs) is used in any assessment. In addition, this should inform a detailed landscape character assessment for the capture facilities, associated infrastructure and route corridors.

With regard to visual receptors, views from users of open access land needs to be included.

The Geoffrey Jellicoe-designed shale and limestone quarry screening landscape needs to be considered as a 'valued landscape' in any assessment made.

The proposal needs to be assessed within the context of the National Park environment and its primary landscape objectives, and the report should include (but not necessarily be limited to):

Landscape and Visual Impact Assessment (LVIA) including:

- Identification of landscape character (including landscape character areas and landscape character types) as part of any baseline assessment of landscape;
- Zone of Theoretical Visibility to ascertain likely viewpoints;
- Zone of Visual Influence (ZVI);
- Identification of sensitive visual receptors within the ZVI;
- Identification of public rights of way, open access land and key areas of recreational amenity within the ZVI;
- Viewpoint analysis; with particular attention to potential views identified within the Scoping Report (January 2026) and those listed below.
- Identification of visible elements of the carbon capture facilities and their associated infrastructure at the emitter sites in the context of the National Park landscape and its setting i.e. adjoining land.
- Photographic material to support the assessment of likely adverse impacts, with the sites, and the nature and scale of the development clearly annotated on photographs and photomontages.
- Photomontages/CGI images of the emitter sites as existing and as proposed post construction of the carbon capture facilities and their associated infrastructure.
- Photomontages/CGI images to show any potential landscape mitigation/compensation measures or landscape enhancements proposed by the scheme.

Viewpoints from within the National Park relevant to development at Hope Cement Works to be included as a minimum are:

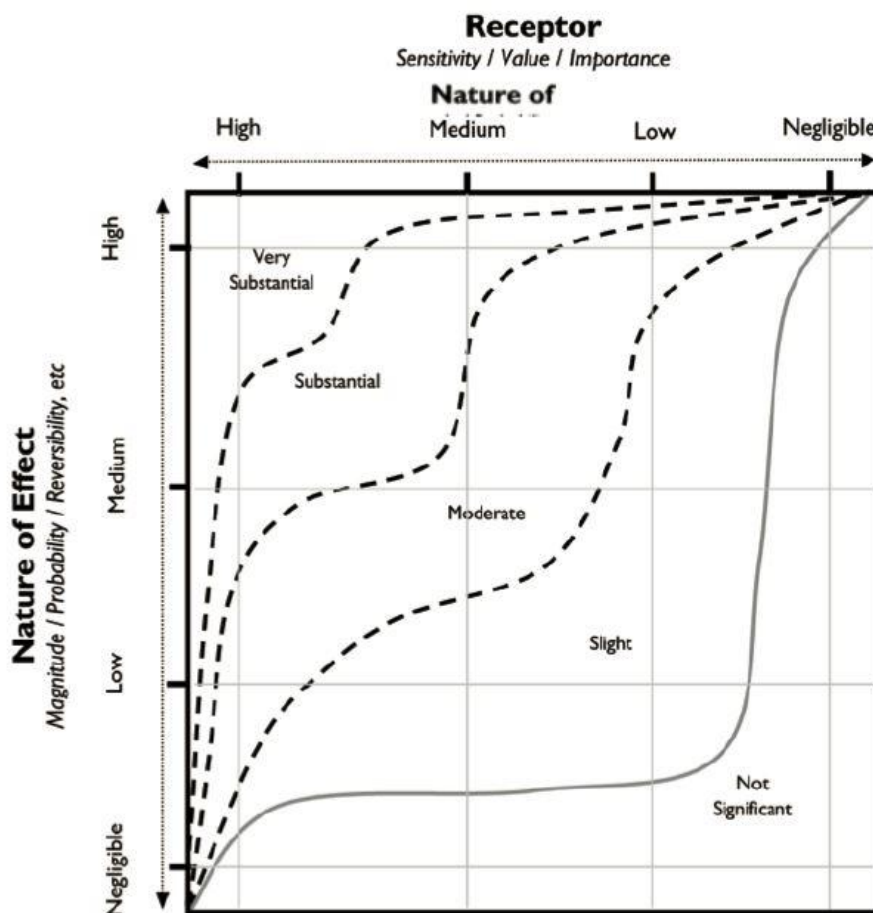
- Footpath between Pindale Cottage and Bradwell (Hope BW9);
- Pindale Road (NCN Route 6);
- Access Land between Siggate and Pindale Road;
- Footpath between Castleton and Hope (Hope FP 7);
- Eccles Lane at Bridge over Shale Quarry Access Road;
- A6187 Castleton Road;
- B6049 Stretfield Road;
- Footpath between Castleton and Hope (Castleton FP 34);
- Peveril Castle;
- Footpath North of Hope (Hope FP1);
- Brough Lane adjacent to Entrance to Elmore Hill Farm;
- Parsons Lane;
- A6187 Hope Road;
- Close to End of Access Road to Treak Cliff Cavern;
- Footpath above Treak Cliff Cavern (Castleton FP12);
- Footpath adjacent to Thornhill Lane (Thornhill FP11);

- Lose Hill;
- Win Hill;
- Hollins Cross;
- Mam Tor;
- PRoWs on elevated ground to the South West on Bradwell Moor;
- CROW Open access land and PRoW's on Abney Moor close by near Bleak Knoll;
- Looking west toward the Works from PRoW WD81/21 that links Hathersage and Thorpe Farm.

Specific consideration should be given to the impact of the carbon capture facilities and associated development at the emitter sites and their relationship with the National Park landscape and it's setting. The assessment should include adverse impacts and potential enhancements that could be achieved through the project, such that a balanced view of overall landscape harm/benefit can be arrived at.

In regards section 7.6.32 'People using parks and open spaces' of the Scoping Report. It is suggested that this wording should be amended to include people using the network of PRoW and Open Access Land.

In regards Table 7.17. It is considered to under-estimates the potential significance of effects for high / very high sensitivity receptors. The IEMA significance matrix below has been included to illustrate the point.



It is considered that '*major or moderate (significant)*' should be included for medium magnitude of effect / high sensitivity and '*major or moderate (significant)*' for low magnitude of effect / very high sensitivity.

3. Biodiversity

It is considered that the proposed scope is sufficient to ensure that impacts are assessed at preparatory, construction and operational phases of the development.

Recommendations for avoidance, mitigation, compensation and enhancement measures will be proposed to minimise any adverse effects on these identified ecological features. Where necessary, the significance of any residual effects will be assessed. Examples of potential mitigation approaches are described; however, agreed mitigation proposals will be detailed within the EclA.

Planning policies and guidance

Relevant national, regional and local planning policies and guidance are cited and it is acknowledged in the document that those listed are not exhaustive. For instance, BS 42020 Biodiversity: Code of Practice for Planning and Development should be included in Table 6.3.

The applicant should be directed to the Peak District National Park's Nature Recovery Plan [The Peak District | Nature Recovery Plan](#). Although not a statutory document, it identifies priority habitats, species and ecological networks in the Peak District and seeks to have regard to the statutory Local Nature Recovery Strategies across the area. It can be used to ensure that avoidance, mitigation and enhancement measures contribute to strategic nature recovery objectives.

Biodiversity Net Gain becomes mandatory for NSIPs in **May 2026**, subject to the confirmed government timeline. BNG considerations should begin at the early design stage. Off-site units, geographic offset requirements and habitat availability often need to be confirmed well in advance of Examination and DCO submission. We therefore welcome the fact that early engagement has taken place with regional and national stakeholders to discuss potential strategies to deliver BNG, (including Nature North, Natural England, EA, Cheshire Wildlife Trust and Derbyshire Wildlife Trust); and encourage the applicant to engage with the Authority as well.

Zone of influence

The defined study area and potential ZOI has been identified up to 15 km. The distance has been determined based on 'professional judgement and experience of other similarly scaled projects and should be sufficient in which to assess all possible effects on ecology and biodiversity.' The PDNPA generally agrees and the distance aligns with guidance from CIEEM (2024) ensuring all likely significant effects are assessed. However, more detailed justification for the ZOI for each receptor should be provided in the EclA. For example, potential impacts from noise, light/air pollution may influence receptors at greater distances.

A desk study will identify European statutory designated sites within 15 km of the Scoping Boundary, seeking to address potential effects upon their qualifying features particularly those such as mobile species e.g. birds or bats (where the search area may be extended to 30 km). An initial study of the biodiversity baseline environment has been undertaken through desk-based research using relevant resources. It is understood that a more detailed desk study of the baseline biodiversity environment will be undertaken for the Preliminary Environmental Information Report (PEIR) and to assist in planning the surveys required for the EclA.

The Priority Habitat Inventory (PHI) maps will be used to locate priority habitats. It is requested that the applicant consults the authority to determine if any additional areas of habitat that meet the criteria for priority habitat, but which are not currently on the inventory, may be impacted by the proposals. For instance, the priority habitats map does not currently fully reflect the number of traditional hayfields in the Peak District National Park. We are aware that a number of potentially impacted fields have been considered for SSSI designation.

The PDNPA requests consideration as to whether there is scope to avoid harm to areas that have been grant aided through the Farming in Protected Landscapes (FiPL) programme.

Identification of Potential Effects

The scoping report identifies that the Proposed Development has the potential to result in effects on biodiversity features as set out within Tables 6.10 – 6.12 of the scoping report. The potential environmental effects will be assessed within the subsequent ES for the construction, operational and decommissioning phases of the Proposed Development.

The scoping report suggests that any significant adverse effects will be mitigated or compensated for, whilst ecological enhancements may be recommended where appropriate to meet planning policy objectives.

Biodiversity Conclusion

The PDNPA is satisfied that the scope of the ES as detailed within the Scoping Report has adequately identified likely significant effects and is suitable to ensure potential ecological impacts are addressed; including adherence to avoidance-mitigation-compensation hierarchy. However, it is requested that the applicant consults the authority to determine if any additional areas of habitat that meet the criteria for priority habitat, (but which are not currently on the Priority Habitat Inventory), may be impacted by the proposals.

Any conflicts with National Park purposes should be suitably mitigated, including (but not limited to) consideration of Natural Zone policies and a Habitat Regulations Assessment if relevant. The PDNPA encourages the use of the Peak District Nature Recovery Plan to ensure alignment with local nature recovery priorities consistent with national policy.

4. Climate Change

The ES should include the matters defined in the scoping opinion request and as a minimum:

The assessment should establish a figure for 'Relative Emissions', which is a comparison between the 'Baseline Emissions' and the 'Absolute Emissions'. The Baseline should be established using the EIB Project Carbon Footprint Methodologies: Methodologies for the Assessment of Project GHG Emissions and Emission Variations (January 2023).

Assessment of emissions should include emissions associated with:

- Scope 1: activities associated with the construction of the pipeline and carbon capture facilities and associated infrastructure, including the release of carbon instigated by the disturbance of soils, combustion of fossil fuels, such as diesel for onsite power generation, plant machinery and vehicles; emissions associated with any proposed drilling and natural gas consumption.

- Scope 2: requirements for electricity associated with the operation of the carbon capture facilities, pipeline and associated development, including purchased electricity, heat, steam and cooling associated with lighting, ventilation and other uses associated with the carbon capture.
- Full comparison of resultant CO² emissions as a consequence of the development compared against those that would be produced at the emitter sites should carbon capture not be implemented.
- Mitigations associated with the restoration scheme and any positive contributions to the carbon balance should also be defined.

5. Cultural Heritage

If Historic Environment is to be addressed in a combined chapter, it is essential that the assessment is prepared by technical consultants suitably qualified in both archaeological and built environment impact assessments.

The EIA may benefit from the disciplines being divided into separate chapters prepared by suitably qualified technical consultants and for ease, given the predicted scale of both impact assessments.

Within the methodology, there is no reference to how views or a Visual Impact Assessment might be utilised to understand potential significant impacts on heritage assets. The initial ZTV studies illustrate potential visibility from numerous sensitive historic environments, affecting listed buildings, RPGs, Conservation Areas, Scheduled Monuments and NDHAs and / or the setting of these assets. Views which are useful for identifying and assessing potential impacts on above ground heritage assets should be identified within the EIA and utilised as part of the Historic Environment assessment.

Initial viewpoints and broad viewpoint locations (informed by initial ZTV studies and other landscape and environmental conditions) have been identified in a series of maps at **Appendix B**. Whilst it is expected that viewpoint locations will be subject to further consultation and agreement with statutory bodies and refinement subject to further design evolution, from an initial review there are a number of highly sensitive historic environments (including individual heritage assets and settlements) which are not presently represented in the viewpoint study. Within the PDNPA, broad areas of visibility from settlements not represented by a viewpoint include: Hathersage, Bamford, Chelmorton, Cressbrook, Onecote, Wetton, Upper Elkstone, Calton, and Great Hucklow. There is likely to be other, more remote / non-settlement locations which are of important heritage consideration which may also be underrepresented in the views study.

The viewpoint selection will be expected to be subject to a degree of careful scrutiny to ensure the assessment includes those views which aid an understanding of potential impacts on heritage assets within the PDNP.

It is requested that the PDNP boundary be added to all the relevant maps/figures in Appendix B. Where designated assets straddle study area boundaries (i.e. the 5km boundary), please include within the plan the full extent of the designation. For example, the boundary identifying Hathersage Conservation Area is missing on **Figure 10.1B**, whilst others including Foolow and Edale Conservation Area boundaries and several Scheduled Monuments have only been partially mapped where they fall within the study area. Please ensure this is applied across all figures mapping heritage assets (designated and non-designated).

Lyme Park

Given the developing nature of the design details which are the subject of the Proposed Development, the PDNPA does not have a fully informed or detailed understanding of the likely significant impacts on the Historic Environment within the PDNP or its setting (and the likelihood of potential individual effects is not set out in the Scoping Report).

Notwithstanding this, it is clear that the Proposed Development in its current form (which includes two options for routing the pipeline through/on the outskirts of Lyme Park) has the potential to result in a significant adverse impact on the heritage assets within Lyme Park, particularly Lyme Park Conservation Area and Lyme Park Grade II* RPG, as well as to potentially affect the setting of a number of listed buildings within the parkland, including the Grade I Lyme Park (principal hall) and Grade II* Cage, amongst others.

The potential impacts on Lyme Park, the mitigation of such impacts and their assessment within the EIA should be a foremost consideration of the Historic Environment assessment.

Hope Cement Works

History/Context: The Hope Cement Works was established in 1929 by G. and T. Earle. In 1942, George Earle commissioned the esteemed landscape architect, Geoffrey Jellicoe, to develop a landscape strategy/programme of intent that would be used to influence the evolution and development of the quarry within the landscape (soon to be designated as a National Park). The plan was further developed in turn by Sheila Haywood (formerly Jellicoe's assistant), who continued the supervision of the landscape and was succeeded in turn by John Windsor (formerly Haywood's assistant) and David Jarvis (formerly Windsor's assistant).

RPG Designation Review: Hope Cement Works was the subject of a review by Historic England (in partnership with The Gardens Trust) in 2020 for inclusion as a Registered Park and Garden on the NHLE as part of a national project reviewing post-war landscapes. A Designation Report prepared by Historic England (18 August 2020) summarised their recommendation that the site not be registered owing to its status as an active quarry and to not consult on the assessment for the same reason. It was considered, given ongoing limestone and shale quarrying and processing, and valid permissions for these activities until 2042 (with the final extent and content of the quarry, and outcome of Jellicoe's strategy, unknown until the cessation of these activities) that registering the site would not be appropriate at the time.

Historic England's Designation Report concludes by stating that at the point at which extraction at the site ceases (in 2042), Hope Cement Works will be a "static landscape" with "clearly defined boundaries" and can subsequently be "examined as a complete project".

Historic England summarises the context for the consideration of the site:

"Industrial landscapes are seldom recognised as being of special interest per se, as, in most instances, landscape design is used as a means of hiding what is considered to be the negative impact of, for instance, power stations or car factories on their surroundings. This too was the imperative for the landscaping interventions at the Hope site, but its location, in a landscape of exceptional quality soon to be recognised as England's first National Park required much more than a landscape design. Jellicoe's suggested approach was to develop a strategy for mitigating the effects of a massive limestone quarrying and processing operation in a highly sensitive location, which would require adjustments as the extraction of materials continued decade after decade. The strategy recommended by Jellicoe has shaped the ongoing management of the site as the quarry advances westwards, and will hopefully continue to do so for the duration of the quarrying permission."

"The final report, completed in November 1943 was the first 50 year plan for a quarry in England, and marked a way forward for the landscaping of very large industrial concerns and the transformation of the landscape profession away from the design of parks and gardens".

Future Considerations:

Historic England's Designation Report highlights the potential that Hope Cement Works could be subject to a secondary review for designation as an RPG upon the cessation of its activities. Given there is no certainty that the site would become a designated heritage asset, it is not anticipated that Hope Cement Works would be treated as part of a Future Baseline assessment scenario within the EIA, however the significance of the Site (which, even if not identified to be of a national level by Historic England would be of considerable local/regional importance) and the potential impact of the Proposed Development on the landscape it embodies should form part of the forthcoming Historic Environment assessment.

Specific Comments on Section 10: Historic Environment of Scoping Report Volume 1

10.3 Defining the Study Area

Para 10.3.7 confirms that a *"study area of 1km from the draft Order Limits (once established) in relation to below ground components of the Proposed Development will be taken forward for assessment in the EIA".*

Para 10.3.8 confirms that for *"above ground components of the Proposed Development, an initial study area of 2km is proposed to be taken forward for assessment in the EIA, and a wider study area of up to 5km will be proposed for assets beyond the 2km study area that are highly sensitive to change as a result of the Proposed Development".*

Response: at **para 10.7.17**, it states: *"Taking into account the historic baseline information collated for this Scoping Report, the following study areas will be taken forward for assessment in the EIA:*

500m from the draft Order Limits (once established) in relation to below ground components of the Proposed Development".

This is reiterated at **para 10.8.3**.

This is a reduction of 500m and at odds with the 1km study area identified for inclusion in the EIA at **para 10.3.7** for below ground components of the Proposed Development. No explanation or justification for this is provided in either **Section 10.3** or **10.7** or in the accompanying baseline information at **Appendix H**. As per **para 10.3.9**, we agree that study areas must be agreed following further consultation with LPAs (including the PDNPA), after further examination of the ZTV studies, and further design development.

No study area has been confirmed for the identification or assessment of Non-Designated Heritage Assets (NDHAs) or other non-statutory heritage assets. Confirmation of study area for assessment of the Proposed Development on NDHAs/non-statutory heritage assets should be provided.

10.4 Baseline Environment

NDHAs have not been identified through the scoping exercise. **Para 10.7.14** confirms that NDHAs *"have not been presented in this chapter. Information for these assets will be requested*

from the relevant Historic Environment Records (HER) and incorporated into the assessment presented within the DBA, PEIR and ES".

Response: Liaison with the PDNPA will be expected to ensure the study area and scope of assessment for NDHAs and other non-statutory heritage assets is proportionate to the potential impact of the Proposed Development.

The PDNPA should be formally consulted for historic environment data as well the relevant HERs as we hold additional datasets, including particularly important information on lead working sites/landscapes which includes below ground and upstanding remains at a landscape scale. The PDNPA consider many of these sites to be of equivalence significance to formally designated Scheduled Monuments. There will be a charge for our data sheets.

Under the heading 'Future Baseline', para **10.4.6** states *"there is unlikely to be any change to the historic environment baseline conditions described in the previous section"*.

Response: Whilst it is acknowledged that this is in reference to designated heritage assets only (given NDHAs are not identified as part of the scoping exercise), there is no consideration given to the potential future historic environment baseline within the context of NDHAs. This is particularly relevant given the likelihood for significant effects at the Breedon site, Hope Cement Works, which was subject to a review for inclusion on the NHLE as a Registered Park and Garden in 2020 (previously referenced above).

There is no methodology (either in **Section 10.4** or in **Section 10.7**) provided to explain how changes to the baseline in the future might affect the potential effects of the Proposed Development on the historic environment (including both designated and non-designated heritage assets) or how they would be assessed within the EIA.

10.5 Planned Surveys

Table 10-5: Scope of Proposed Development Surveys establishes that a 'Heritage Walkover Survey' will be conducted, comprising *"site visits to view relevant designated and non-designated assets and identify additional assets not recorded in existing datasets"*.

Response: What is the planned scope of this survey? Does it comprise systematic coverage of the whole scoped extent? A methodology for this survey should be provided.

10.6 Identification of Potential Effects

Para 10.6.9 states that *"Embedded Mitigation will be built into the Proposed Development to minimise impacts to heritage assets and their setting, as far as possible, with particular consideration given to the listed buildings and known archaeological sites located within the Scoping Boundary."*

Response: whilst the identified receptors should receive full consideration through the embedded mitigation (and, if necessary additional mitigation) of the Proposed Development, a similar level of consideration should likewise be applied to mitigating any potential significant effects on other designated heritage assets, including Conservation Areas and RPGs (particularly given the potential impact on the Grade II* RPG and Conservation Area of Lyme Park), and NDHAs.

10.7 Scope and Methodology

Para 10.7.3 identifies the data sources that will be used for desk-based research.

Response: Data sources should also include the PDNPA HER (see also para 10.7.14).

Table 10-6 contains the criteria for determining the value of heritage assets.

Response: There are some queries about the categorisation of different heritage assets within this table. For example, NDHAs (of “*demonstrable national or international importance*”) are included within the ‘High’ category, however there is no allowance for Grade II listed buildings of demonstrable national or international importance to be included within this category.

We also query the meaning of the language used in the ‘Medium’ category to describe “*averagely preserved historic landscape character areas*” and “*historic townscapes with historic integrity in that the assets that constitute their make-up are clearly legible*”. These definitions of heritage assets are unclear and confusing.

Further, more detail/clarification should be provided between different types of significance embodied by Conservation Area designations. Within the PDNP, Officers consider most Conservation Areas to be of High significance.

We would advise a review of the contents of this table to ensure the contents and distinctions between different categories are clear.

Table 10-7 contains the criteria for determining the magnitude of impact of the Proposed Development on heritage assets.

Response: Whilst it is accepted that the language used to determine impacts is aligned with EIA methodology/terminology, it would be useful for this section to include an explanatory statement of how these effects (in EIA terms) relate to levels of harm defined within the language of the NPPF (i.e. substantial, less than substantial).

Similarly, there should be consistent terminology used for defining the special interest of an asset, i.e. either ‘heritage value’ or ‘significance’.

Under the heading ‘Consultation’, **para 10.7.12** states that “*engagement with Historic England and relevant Archaeological Advisors for Local Planning Authorities should be undertaken to confirm the scope of the historic environment Desk-based Assessment and heritage surveys.*”

Response: Consultation with LPAs should include Built Environment officers.

6. Archaeology

The Historic Environment is covered in Section 10 of volume 1 of the Scoping Report, but it only considers designated heritage assets. It does however make provision for non-designated heritage assets, historic landscape character and other historic environment records to be considered as part of the Preliminary Environmental Impact Report (PEIR).

The PDNPA agrees that impact on archaeology, heritage assets and cultural heritage needs to be scoped into the EIA. The assessment needs to include consideration of temporary construction impacts; permanent construction impacts; impacts from the operational phase and from decommissioning, as all have the potential to cause harm to the historic environment.

The PDNPA welcomes the consideration of all forms of mitigation, including works to remove/avoid or minimise harm (micro siting, route refinement etc.). This should be the default position, and any impacts that can be designed out, should be designed out.

The Authority broadly agrees with the broad scope of the future work and assessments proposed to contributed to the relevant chapter of the ES, but subject to the following detailed comments below.

Comments:

- Relevant legislation - para.10.2.1 Table 10-1 - the National Parks Act (1949), Environment Act (1995) and the protected landscapes duty in Levelling Up and Regeneration Act (2023) to be added for the PEIR and ES stage.
- Relevant policies – table 10-2 and para.10.7.5 only includes PDNPA Local Development Framework (2011) not the development management policies (2019), which is missing from the list and needs to be added and considered for the to be added for the ES stage.
- Standards and guidance – table 10-4 add to this for the PEIR and ES stage Historic England's specific guidance on peats and peatland management, particularly the guidance around assessing the resource, appropriate survey and techniques, deposit modelling, assessing the state of preservation, under hydrogeology etc. [Guidance for Carrying out Peat Restoration: Assessing the Resource | Historic England](#)
- Proposed study area- para.10.3.5-10.3.9 – PDNPA agrees with the proposed areas and extents outlined subject to review following production of ZTV. But this differs to what is set out at para.10.7.16 with respect to belowground components. It states 1km at para. 10.3.7 and only 500m at 10.7.17 and para.10.8.3. The PDNPA strongly advocates for the 1km from the draft order limits for the assessment area.
- Planned surveys to inform PEIR and ES chapters – table 10-5:

Walkover surveys – the PDNPA need to know more about the proposed methodology and scope for this. Will it be systematic coverage the full extent of the scoping and assessment area; just immediately on the route; or will it really be a short visit to support the DBA. The Authority advocates for a comprehensive systematic walkover survey across the whole extent. The nature and scope of this would be very different depending on landscape context and nature of known/predicted archaeological resource e.g. improved agricultural fields vs. unimproved or moorland sites with peats that might need targeted focus of walkovers on areas of erosion, hags, water course and grips or gullies.

Non-invasive surveys – geophysics is planned, on 'suitable and accessible land'. The PDNPA suggests a range of non-invasive surveys should be extend to include geochemical and UAV surveys to provide a more complete picture, particularly as trial trenching is proposed significantly later in the programme. This has been used successfully to help inform approach to intrusive evaluation on other large scale development sites in the National Park (such as mineral extraction sites) and as part of the HS2 project.

Geologies that are not responsive to the more widely used geophysical techniques also need to be considered. Carboniferous limestone offers mixed and sometime unreliable results to magnetometry. There are also difficulties when using geophysics on peats. Alternative or additional/supporting methods of assessment will be needed.

If the route includes ploughed and arable fields, then fieldwalking should be considered as pre-trial trenching evaluation technique.

Paleoenvironmental and Geoarchaeological Assessment - this needs to take place alongside the initial surveys and the desk-based assessment so that it can inform the PEIR and the ES chapter, targeted at areas of known peat or potential peaty soils (Natural England's peat map provides a rough indication). It should follow Historic England guidance on assessment of the peat resource (link provided already above) and should highlight the archaeological interest and potential and the need for further sampling and surveys at evaluation stage

Trial trenching – the report mentions that this will be 'targeted' but not how it will be targeted, and it states it will only take place along the pipeline corridor where it interacts with 'significant archaeology'.

It is not clear what significant means in this context, because the very purpose of archaeological evaluation, including trial trenching is to characterise the nature, state of preservation and significance of the archaeological resource. Trial trenching cannot target 'significant archaeology' when it's designed to help define and understand significance.

It needs to include areas of the direct pipeline corridor where direct physical impacts will take place e.g. compounds, laydown areas, storage areas, temporary roads and tracks, temporary car parks.

It also must include targeting of blank area also; to test where direct impacts are predicted as outlined, but it also needs to also test areas that appear to be absent of archaeology to evaluate the success of the evaluation techniques in correctly identifying areas of archaeological interest and potential, and what it may have missed.

- Potential Effects – para. 10.6.5 – this should explicitly include paleoenvironmental remains also.
- Mitigation options- para.10.6.10 also needs to explicitly include the provision open-area excavation, paleoenvironmental and geoarchaeological sampling (buried soils, coring etc.).

It also needs to consider where enhancements or compensatory measures can be delivered such as interpretation and dissemination (offsite, onsite, remote, online); conservation benefits that can be delivered along the route.

- Historic Environment Data- para.10.7.3 – needs to include consultation of the PDNPA HBSMR. Whilst the Authority is not a formal HER it does hold a number of data sets in addition to the HER and which will be required for assessment of the historic environment to take place. Of particular interest and value are the Lead Mining data sets, that include sites and landscapes of regional and national significance; PDNPA's Historic Landscape Characterisation data and our knowledge of Aerial Photo sources available for our area.

Similarly, the National Trust's records also need to be consulted, as one of the proposed routes passes through Lyme Park.

Historic England's National Mapping Programme data would also be essential, as it includes many features already identified through LiDAR and Aerial Photo analysis.

- Receptor Value – para.10.7.9, Table 10-6 – all nationally designated heritage assets should be considered of high value. Grade II listed buildings and grade II registered

parks and gardens contribute are designated because of their national significance and contribute to national research objectives.

Consideration also needs to be given to heritage assets within the National Park, these do not just have their own intrinsic significance; they contribute to the Special Qualities of a nationally designated protected landscape, as described in PDNPA's management plan. The environmental assessment must have regard to our special qualities and the contribution of heritage assets to them.

- Magnitude of impact – para. 10.7.10, table 10-7 – the terms and values used should follow or at least echo and be attributable to the levels of harm defined in NPPF and its supporting guidance e.g. *substantial*, *less than substantial*.

Maps and drawings - National Park boundary should be on all relevant figures produced for the PEIR and ES. Where assets (designated or otherwise) fall partly within the boundary of the assessment area, the full extent of that asset needs to be mapped; the maps currently chop off any extent of the assets that fall outside of the study area.

7. Human Health

The ES should include an assessment based on the information outlined in the Scoping Opinion request and ensure that the chapter includes:

Review and present baseline data along with a review of the environmental context.

A preliminary review of the design proposals in the form of a 'Rapid Health Impact Assessment', undertaken in accordance with guidance. Potential health impacts (both adverse and beneficial) are identified for relevance against a series of broad health determinants.

An assessment providing more in-depth analysis and assessment of the potential impacts of the proposed development on the health determinants identified above, and the subsequent effects on health and wellbeing. Indicators to be considered in the assessment are:

- Access to Open Space and Nature;
- Air Quality, Noise and Neighbourhood Amenities;
- Accessibility and Active Travel;
- Crime Reduction and Community Safety;
- Access to Work and Training;
- Minimising the Use of Resources;
- Climate Change.

8. Transport

The Scoping Report acknowledges that there are currently many unknowns in regards transport matters relating to the scheme and that these will become clear as the project develops further. It is expected that the Environmental Statement and Transport Assessment (TA) will fully consider matters related to transport once haulage route options necessary for construction purposes are defined as the scheme develops. The PDNPA would expect the TA to fully consider the capacity of routes into and out of the National Park, in particular during peak times for visitor usage e.g. summer holidays, bank holidays, etc.

Whilst it will be important to consider both highway capacity and safety, the impact of additional vehicle movements, particularly HGVs on users of the National Park and their enjoyment of it should also be considered.

The PDNPA Management Plan 2023-28 defines the Park's Special Qualities which include:

'Undeveloped places of tranquillity and dark night skies within reach of millions' and 'An inspiring space for escape, adventure, exploring and quiet reflection'

The impacts of traffic movement in the context of these special qualities should be considered fully by the ES.

Table 8-2: Traffic and Movement – Policy – needs to include reference to the PDNPA Core Strategy, particularly Policies T1 and T2.

Table 8-4: Traffic and Movement – Breedon Capture Facility – incorrectly states that Castleton is located to the east of the site and Hathersage to the west, however the opposite is the correct geographic description.

Under A57, it should be recognised that there is currently a 7.5 tonne weight limit on the road between its junction with the A6013 Ladybower and Glossop.

Paragraph 8.6.37 – the PDNPA should also be consulted on the EIA.

9. Materials and Waste

The ES should include detailed information on the proposed waste management strategy, to include:

- Volumes of waste arising from the proposed development area
- Rates of waste generation
- Type of waste generated and potential for reuse as part of the construction process
- Proposals for backfilling and management of waste material.
- Appropriate mitigation through design of the waste disposal strategy.

10. Soils and Agriculture

The ES should consider:

- The degree to which soils would be disturbed/harmed as part of this development
- Proposals for handling different types of topsoil and subsoil and the storage of soils and their management whilst in store;
- The method of assessing whether soils are in a suitably dry condition to be handled (i.e. dry and friable), and the avoidance of soil handling, trafficking and cultivation during the wetter winter period;
- The effects on land drainage, agricultural access and water supplies, including other agricultural land in the vicinity;
- The impacts of the development on farm structure and viability, and on other established rural land use and interests, both during the site working period and following its reclamation;
- A detailed Restoration Plan illustrating the restored landform and the proposed after use.

The ES shall include details of:

- Phasing and any required habitat translocation
- Elements of natural regeneration,
- Proposed use of soils and soil forming materials
- Methods of implementation; use of machinery, soil handling and conservation methods.

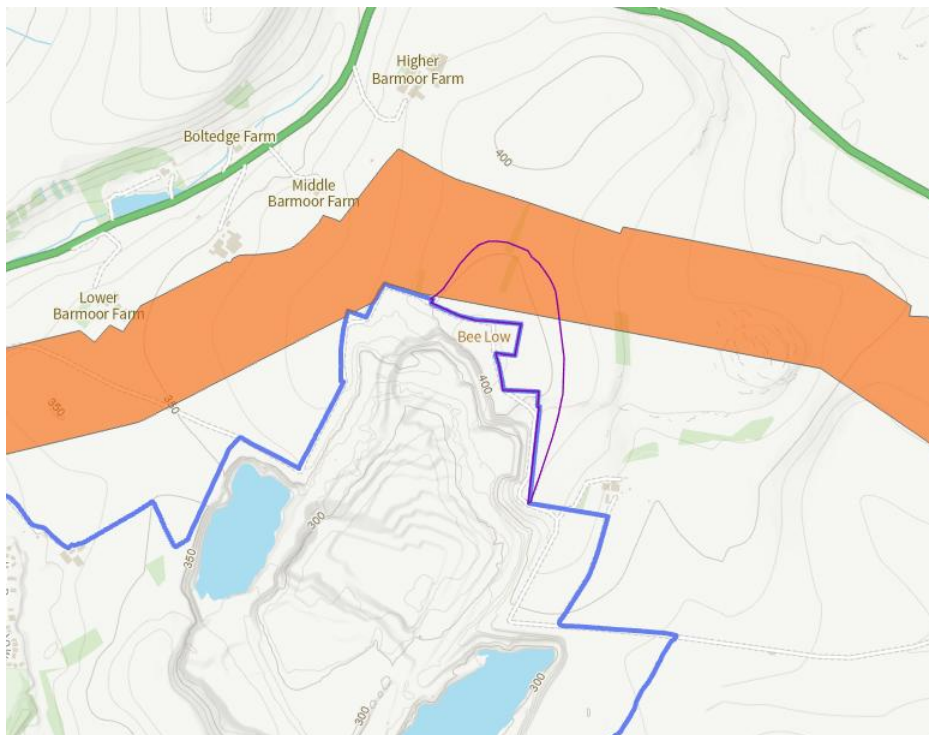
11. Geology

Table 13-4: Breedon Capture Facility – states that there is only one active quarrying within the EIA Scoping boundary, however Hope Shale Quarry is also present as well as Smalldale Head, a very low output opencast fluorspar working. **More pertinently, the proposed route corridor passes through the consented ‘Beelow’ extension to Doveholes Quarry, an active large scale aggregate producing site of regional and national importance (further detail below).** Moss Rake East and Moss Rake West are both restored former opencast fluorspar workings.

12. Risk of Major Accident or Disaster

The scoping opinion report states that the potential for major disasters will be included as part of the ES and outlines that they could include both natural and man-made hazards. Whilst it is considered the risk of a major accident or disaster is unlikely given modern working practices and regulatory controls, it is important the possibilities are explored.

Reference to the Quarry Regulations 1999 may be appropriate to include should aspects of the project affect any of the consented mineral extraction activities. The Doveholes to Hope pipeline route corridor overlaps the Beelow extension to Doveholes Quarry, with any route in this area being required to pass immediately to the north of the consented extraction area. See extract plan below.



Proposed pipeline route corridor

Doveholes quarry permission boundary (in DCC)

Beelow extension permission boundary (in PDNPA)

There is the potential for sinkholes to develop along the Doveholes to Hope route corridor due to the presence of unmapped historic lead workings close to the ground surface. These could occur during construction or operation and the route should be carefully considered to take account of this threat and remediation measures included in the event that a sinkhole develops in the vicinity of the pipeline.

Consideration of risk of major accidents or disasters in accordance with the IEMA's Major Accidents and Disasters in EIA: A Primer (September 2020) 3 stage approach.

13. Socioeconomics

The ES should include a chapter on socioeconomics as outlined in the Scoping Report in order to identify the benefits of carbon capture and storage that could arise from the construction phase of the development and its operational life. There could also be negative impacts upon tourism and recreation which the scoping report identifies and will need full consideration in the ES. Users of open access land should be considered as well as those using public rights of way. These impacts should be considered in the context of both the purposes of the National Park and its special qualities (outlined at the start of this letter) as defined in the Environment Act 1995 and the PDNPA Management Plan 2023 -2028.

The scoping report notes that recreation and tourism will be covered in the socio-economic sections, but also addressed elsewhere in the context of: visual impact on the population and users, transport impact on access and routes, noise on users of routes, and for amenity effects. It is considered that a separate section on access & recreation will draw this together to allow for adequate assessment of the environmental, economic, and social impact on all public access resources and opportunities for use by residents and visitors within and adjoining the Peak District National Park.

The detailed assessment of routes/spaces is not provided at this stage, but should include:

- Public Rights of Way
- Access Land
- Active Travel Strategic Network
- Pennine Bridleway National Trail
- Promoted routes – Limestone Way, Gritstone Trail
- Claimed routes
- Permissive routes
- Recreational sites

To establish the baseline:

- Identify recreational opportunities that may be affected
- Determine users, activity types and levels of usage
- Consider travel distances and the network connectivity
- Undertake value assessments.

Consider the extent of changes in the amenity or recreation resource/receptors relating to:

- Permanent/temporary closure/diversion
- Loss/gain of amenity
- Existence of equivalent recreational opportunities
- Displacement of activities
- Enhancement

This approach could support the tourism study proposed in the socio-economic section.

It will also be appropriate to consider the long-term socioeconomic impacts of the project in relation to the continued manufacture of cement in the Peak District region given the likelihood of further mineral extraction in the region to feed the respective cement and lime plants. These impacts could be both positive and negative. The ES should consider both and reach a balanced conclusion.

Table 14-13: Overview of Potential Impacts scopes out effects on communities, visitor attractions and business during the operation and maintenance phase of the development. The PDNPA considers these effects should be scoped into any assessment as the carbon capture infrastructure and associated developments at the emitter sites have the potential to be detrimental to visitor's enjoyment of the National Park due to their visual and operational impact, which may affect visitor numbers and ultimately the local economy in the long term.

14. Consideration of Alternatives

This Scoping Opinion relates to the potential future development of carbon capture facilities at the 4 emitter sites and an associated underground pipeline to transport CO₂ to the coast. A range of alternatives to the proposed development should be considered.

The ES should include consideration of alternatives in relation to:

- The 'do nothing' scenario and allow the emitter sites to continue to operate without capturing the CO₂ they emit.
- Whether alternative means of transporting captured CO₂ represents a more sustainable options e.g. transport via tanker on road or rail.
- Whether there are means of storing the CO₂ effectively at the emitter sites or at other locations.
- The option of ceasing cement/lime production at the emitter sites when their consents and associated mineral reserves are exhausted with a view to obtaining cement from other sources and/or locations.
- Whether there are other existing facilities which could meet the UK's need for cement and lime located outside of National Park's and their settings.
- Whether alternative facilities could reasonably be developed in order to meet the UK's needs outside of National Parks and their settings.
- Whether there are other viable binding products available at an industrial scale, capable of meeting the UK's needs that are more sustainable and less CO₂ intensive to produce than Portland Cement. Consideration as to whether these options be explored and developed at haste rather than seeking to exacerbate cement production via CCS.

15. Cumulative Impacts

The Scoping Report states that cumulative effects will be considered on the basis of intra-project effects and inter-project effects and defined by the IEMA and as set out by the guidance issued by the Planning Inspectorate. However, there is no defined industry standard for assessing cumulative effects at present.

Typically, cumulative impacts would be defined as successive effects, simultaneous effects (from concurrent development) and combined effects. On this basis combined and successive effects need be considered within the ES.

Combined Effects:

- The Authority takes the view that a decision as to which impacts should be assessed as to their potential to provide significant adverse effects in cumulation can only be properly taken after the initial assessment of all potential impacts. The implication of this is that it is necessary to assess individual impacts, not only as to their significance, but also to their degree of significance on a basis which allows them to be assessed cumulatively.

The scope of combined effects considered in the ES should include (but not necessarily be limited to):

- Cumulation between identified operational impacts e.g. noise, air quality, vibration, Lighting
- Cumulation of visual impact in addition to existing development
- Cumulative effects of the operation in conjunction with the existing associated mineral extraction and cement manufacture operations
- Cumulation of impacts arising from any development required to replace or rearrange existing infrastructure within the emitter sites

The scope of successive effects considered in the ES should include:

- The influence any approval of the project would have on the potential for further mineral extraction in the PDNPA and its setting in order to sustain the cement manufacturing industry.

Appendix I: Table I-1: Other Developments with the Potential for Inter-Project Impacts

Applications to be added to list for consideration of potential cumulative effects:

PDNPA: Planning application ref: NP/HPK/1225/1235 for the lateral extension of Hope Limestone Quarry to provide additional mineral reserves to allow continued on-site production of cement at Hope Limestone Quarry, Hope Works, Pindale Road, Hope, Derbyshire.

Staffordshire County Council: Planning application No. SCC/22/0136/FULL-ES for the consolidation of permissions for the winning and working of limestone and shale together with extensions of the limestone and shale quarries; an extension of time for the winning and working of remaining limestone and shale reserves; the deposit of mineral wastes; and the continued use of processing and ancillary plant at the Cauldon Quarry Complex, Yelsway Lane, Cauldon.

16. Additional Information

The Environmental Statement must be prepared with due regard to Schedule 4 of the EIA Regulations and, in particular, should ensure that the information submitted includes (but is not necessarily limited to):

- a description of the existing site, its environment and setting, and current development situation: Full up-to-date details and plans of the existing site;
- a description of the proposals: Full up-to-date details and plans of development proposed to be undertaken together with restoration timescales;
- a description of the proposed restoration proposals: A restoration strategy of sufficient detail to form the basis of future requirements, to include plans and drawings of the

proposals for the restoration and rehabilitation of the infrastructure required at the emitter sites.

An indication of any difficulties (technical or otherwise) encountered by the applicant in compiling the required ES (and Supporting Statement) information.

17. Non-technical Summary

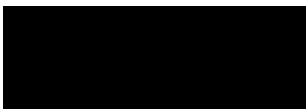
A non-technical summary of the Environmental Statement should be submitted in accordance with the EIA Regulations.

Reasons for the Information Requirements: The development is likely to have significant effects on the environment such as to adversely affect one or more of the interests identified in Schedule 4 of the EIA Regulations. Having considered the nature of the proposed development, the site and surroundings, the wider landscape, and the potential effects on the environment and the relevant interests, the PDNPA is of the opinion that the ES should contain appropriate reports of assessment of the matters listed in this Scoping Consultation Response. It is expected that a DCO application for this proposal would also need to be accompanied by relevant supporting information, plans and drawings, to the satisfaction of the PDNPA (in consultation with the relevant consultation bodies), under the 2017 EIA regulations.

Please note that should an application be made to the SoS for the proposed development, the information provided in this Scoping Consultation Response does not prevent the PDNPA from requesting further information at a later stage. The Authority may also, in writing, require the applicant to produce such evidence as may reasonably be called for to verify any information in the ES [regulation 22(11)].

Scoping Consultation Response:

Completed by: 
Strategic Planning Manager



Authorised by (Signed)

Date 10th February 2026

Authorised Officer of the Authority

Appendix A – Consultee Responses (attached to e-mail)

PDNPA Ecology
PDNPA Landscape
PDNPA Cultural Heritage
PDNPA Built Environment
PDNPA Archaeology
PDNPA Transport
PDNPA Rights of Way

From: [REDACTED]
To: [REDACTED]
Subject: Peak Cluster - L&V scoping comments
Date: 26 January 2026 09:30:16

Hi [REDACTED]

Environment Act 1995 - UK National Park Authorities have two statutory purposes: to conserve and enhance the natural beauty, wildlife, and cultural heritage, and to promote opportunities for public understanding and enjoyment of their special qualities; very relevant for the enhanced duty under s245 LURA 2023 -duty to 'seek to further' the statutory purposes of Protected Landscapes.

The PDNPA 'Landscape Strategy' 2022 – 2031 is the 3rd core planning document for the PDNP. This is especially relevant with regard to landscape designations and consideration of landscape character in and adjoining the PDNP.

It is important that the information for both LCAs and LCTs is used – in addition, this should inform a detailed landscape character assessment for the capture facilities and route corridors.

With regard to visual receptors, views from users of open access land needs to be included.

The Jellicoe-designed shale quarry screening landscape needs to be considered as a 'valued landscape'.

7.6.32 'People using parks and open spaces' – this wording should be amended to include people using the network of PRow and Open Access Land.

Table 7.17

I think this under-estimates the potential significance of effects for high / very high sensitivity receptors – I include the IEMA significance matrix to illustrate the point.

I therefore think that '*major or moderate (significant)*' should be included for medium magnitude of effect / high sensitivity and '*major or moderate (significant)*' for low magnitude of effect / very high sensitivity.

Cheers

[REDACTED]

[REDACTED]

Landscape Architect

[REDACTED]

@peakdistrict.gov.uk



Prestbury Parish Council

Peak Cluster Limited CCS Pipeline:

Application by Peak Cluster Limited (the applicant) for an Order granting Development Consent for the Peak Cluster CCS Pipeline (the proposed development)

Prestbury Parish Council has considered this proposal. The Parish Council has some grave concerns:

- The Parish Council strongly questions the destruction of ancient woodlands and habitat, which contribute significantly to CO₂ capture, to produce this pipeline. This seems counterproductive.
- The Parish Council feels that less destructive alternative schemes should be sought such as methods to lessen carbon dioxide at source or in an environmentally more sound way.
- The Parish Council questions the worthiness of this very destructive scheme to result in only three years' storage capacity. It seems a temporary solution for the destruction caused, especially the disruption during construction.
- The land is well managed agricultural land and this will affect the local economy. The effect on the livelihoods of those affected will be significant. For example, how will livestock welfare and movements be managed during construction?



██████ – Deputy Clerk
Prestbury Parish Council

m: ██████████
w: www.prestbury.gov.uk e: clerk@prestbury.gov.uk

From: [REDACTED]
To: [Peak Cluster CCS Pipeline](#)
Subject: Scoping consultation
Date: 20 January 2026 08:56:53

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Dear Sir/Madam

Thank you for consulting RMBC on the scoping of the Environmental Statement.

Given the proximity of the proposals to the administrative boundary of Rotherham, the Council do not wish to make any comments.

Kind Regards

[REDACTED]
Development Manager – Strategic Applications and Local Land Charges
Planning, Regeneration and Transport
Regeneration & Environment
Rotherham Metropolitan Borough Council

Tel: [REDACTED]

Visit our website: <http://www.rotherham.gov.uk>

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Proposed DCO Application by Peak Cluster Limited for Peak Cluster CCS Pipeline

Royal Mail response to EIA Scoping Consultation

Under section 35 of the Postal Services Act 2011, Royal Mail has been designated by Ofcom as a provider of the Universal Postal Service. Royal Mail is the only such provider in the United Kingdom. The Act provides that Ofcom's primary regulatory duty is to secure the provision of the Universal Postal Service. Ofcom discharges this duty by imposing regulatory conditions on Royal Mail, requiring it to provide the Universal Postal Service.

Royal Mail's performance of the Universal Service Provider obligations is in the public interest and should not be affected detrimentally by any statutorily authorised project. Accordingly, Royal Mail seeks to take all reasonable steps to protect its assets and operational interests from any potentially adverse impacts of proposed development.

Royal Mail and its advisor BNP Paribas Real Estate have reviewed the EIA Scoping Report dated January 2026. There are over 30 operational Royal Mail properties within 10km of the proposed scheme.

The construction of this infrastructure proposal has been identified as having potential to impact on Royal Mail operational interests, particularly given the impact the proposed development could have on the Strategic Road Network. However, at this point in time Royal Mail is not able to provide a consultation response due to insufficient information being available to adequately assess the level of risk to its operation and the available mitigations for any risk. Consequently, Royal Mail wishes to reserve its position to submit a consultation response/s at a later stage in the consenting process and to give evidence at any future Public Examination, if required.

In the meantime, any further consultation information on this infrastructure proposal and any questions of Royal Mail should be sent to:

████████████████████@royalmail.com), Senior Planning Lawyer, Royal Mail Group Limited

████████████████████@struttandparker.com), Strutt & Parker.

Please can you confirm receipt of this holding statement by Royal Mail.

End

From: [Asset.Protection](#)
To: [Peak Cluster CCS Pipeline](#)
Subject: RE: EN0710001 - Peak Cluster CCS Pipeline - EIA Scoping Consultation and Notification J-260114-27394
Date: 14 January 2026 14:40:15
Attachments: [image007.jpg](#)
[image008.png](#)
[image009.png](#)
[image011.png](#)
[image012.png](#)
[image013.png](#)
[image001.png](#)

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ST Classification: UNMARKED

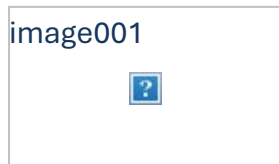
Good afternoon

Please be advised that we do not have any comment relating to the Environmental Statement.

Kind regards



Build Over Technician
Asset Protection
Asset Strategy & Planning
Chief Engineer



From: Peak Cluster CCS Pipeline <PeakClusterCCS@planninginspectorate.gov.uk>
Sent: 13 January 2026 12:28
Subject: EN0710001 - Peak Cluster CCS Pipeline - EIA Scoping Consultation and Notification

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Dear Sir/Madam

Please see attached correspondence on the proposed Peak Cluster CCS Pipeline.

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 February 2026. The deadline is a statutory requirement that cannot be extended. Further information is included within the attached letter.

Kind regards

[REDACTED]



[REDACTED] | Environmental Advisor
The Planning Inspectorate



@PINSgov



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planninginspectorate.gov.uk

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From: [REDACTED]
To: [Peak Cluster CCS Pipeline](#)
Cc: [REDACTED]
Subject: EN0710001 - Peak Cluster CCS Pipeline - EIA Scoping Consultation and Notification
Date: 15 January 2026 16:36:49
Attachments: [image001.png](#)
[image002.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)
[image003.png](#)
[Letter to stat cons_Scoping & Req 11 Notification.pdf](#)

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FAO [REDACTED]

EN0710001 - Peak Cluster CCS Pipeline - EIA Scoping Consultation and Notification

Thank you for consulting us on the Scoping Opinion for the above.

On behalf of the Head of Planning, I can confirm that the local planning authority has no comments.

Kind regards

[REDACTED]
Service Manager
Development Management
City Futures
Sheffield City Council

[REDACTED]
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Web: www.sheffield.gov.uk/planning or www.sheffield.gov.uk/buildingcontrol

Howden House, 1 Union Street, SHEFFIELD S1 2SH

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From: Peak Cluster CCS Pipeline <PeakClusterCCS@planninginspectorate.gov.uk>

Sent: 13 January 2026 15:18

Subject: EN0710001 - Peak Cluster CCS Pipeline - EIA Scoping Consultation and Notification

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Dear Sir/Madam

FAO: Head of Planning

Please see attached correspondence on the proposed Peak Cluster CCS Pipeline.

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 February 2026. The deadline is a statutory requirement that cannot be extended. Further information is included within the attached letter.

Kind regards

[Redacted Signature]



[Redacted Name] | Environmental Advisor
The Planning Inspectorate



@PINSgov



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From: [Clerk to Somerford Parish Council](#)
To: [Peak Cluster CCS Pipeline](#)
Subject: Re: EN0710001 - Peak Cluster CCS Pipeline - EIA Scoping Consultation and Notification
Date: 26 January 2026 10:39:57
Attachments: [1725461070386000_1760576428.png](#)
[1.png](#)
[5.png](#)
[2.png](#)
[3.png](#)
[4.png](#)

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Many thanks for the opportunity to comment on this. Somerford Parish Council met to discuss the proposals last week and resolved not to make any representations.

Best regards,

[Redacted Signature]

[Redacted Name], Parish Clerk
Somerford Parish Council

Somerford sig block.png



From: Peak Cluster CCS Pipeline
<PeakClusterCCS@planninginspectorate.gov.uk>
Date: Tue, 13 Jan 2026 13:06:11 +0000
Subject: EN0710001 - Peak Cluster CCS Pipeline - EIA Scoping Consultation and Notification

Dear Sir/Madam

FAO: Parish Clerk

Please see attached correspondence on the proposed Peak Cluster CCS Pipeline.

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 February 2026**. The deadline is a statutory requirement that cannot be extended.
Further information is included within the attached letter.

Kind regards

[REDACTED]



[REDACTED] | Environmental Advisor
The Planning Inspectorate

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From: [Planningsouth](#)
To: [Peak Cluster CCS Pipeline](#)
Cc: [Planningsouth](#)
Subject: RE: EN0710001 - Peak Cluster CCS Pipeline - EIA Scoping Consultation and Notification
Date: 09 February 2026 15:25:06
Attachments: [image007.png](#)
[image008.png](#)
[image009.png](#)
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[image012.png](#)
[image013.png](#)
[image014.png](#)
[image015.png](#)
[image016.png](#)
[image017.png](#)
[image018.png](#)

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 plans, noting that given the scale of the SPM network area impacted by the proposals which cover a very wide area, these plans show only the 132kV and not voltages below. SP Energy Networks comments at this stage relate to the existing network and proposed grid network upgrades.

Existing network

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.

Proposed Grid Connections

SP Energy Networks is currently preparing its investment programme for the period beyond 2028 and identifying proposals for network upgrades. SPEN will need to review the proposals against its own proposals and advise in due course.

Summary

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



Senior Environmental Planner | Land & Planning
Tel: [Redacted] | Mob: [Redacted]

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

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Internal Use

From: Peak Cluster CCS Pipeline <PeakClusterCCS@planninginspectorate.gov.uk>
Sent: 13 January 2026 14:55
To: Planningsouth <planningsouth@spenergynetworks.co.uk>
Cc: [REDACTED]@spenergynetworks.co.uk>
Subject: EN0710001 - Peak Cluster CCS Pipeline - EIA Scoping Consultation and Notification

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Dear Sir/Madam

Please see attached correspondence on the proposed Peak Cluster CCS Pipeline.

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 February 2026. The deadline is a statutory requirement that cannot be extended.
Further information is included within the attached letter.

Kind regards

[REDACTED]



[REDACTED] | Environmental Advisor
The Planning Inspectorate



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From: [REDACTED]
To: [Peak Cluster CCS Pipeline](#)
Cc: [REDACTED]
Subject: FW: EN0710001 - Peak Cluster CCS Pipeline - EIA Scoping Consultation and Notification
Date: 14 January 2026 14:11:05
Attachments: [image001.png](#)
[image002.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)
[image003.png](#)
[image955383.png](#)
[Letter to stat cons_Scoping & Reg 11 Notification.pdf](#)

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Good afternoon [REDACTED],

Thank you for your email and attached letter giving Stafford Borough Council the opportunity to comment on the Scoping Opinion for the above project.

In consideration of the nature and location of the proposal Stafford Borough Council wishes to provide a no comment response.

Regards,

[REDACTED]



[REDACTED] | Principal Planning Officer (MRTPI)
Stafford Borough Council | Civic Centre | Riverside | Stafford | ST16 3AQ
[REDACTED]@staffordbc.gov.uk | www.staffordbc.gov.uk

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From: Peak Cluster CCS Pipeline <PeakClusterCCS@planninginspectorate.gov.uk>
Sent: 13 January 2026 15:18
Subject: EN0710001 - Peak Cluster CCS Pipeline - EIA Scoping Consultation and Notification

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Dear Sir/Madam

FAO: Head of Planning

Please see attached correspondence on the proposed Peak Cluster CCS Pipeline.

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 February 2026. The deadline is a statutory requirement that cannot be extended.

Further information is included within the attached letter.

Kind regards

[Redacted]



[Redacted] | Environmental Advisor
The Planning Inspectorate



@PINSgov



The Planning Inspectorate



planninginspectorate.gov.uk

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Economic Development and Planning Policy

Wedgwood Building

Tipping Street, Stafford, ST16 2DH

Telephone: [REDACTED]

E-mail: [REDACTED]@staffordshire.gov.uk

Website: www.staffordshire.gov.uk

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

Your ref: EN0710001

Via email only

9th February 2026

Dear Sir/Madam

**Planning Act 2008 (as amended) and The Infrastructure Planning
(Environmental Impact Assessment) Regulations 2017 (The EIA
Regulations) – Regulations 10 and 11****Application by Peak Cluster Limited (the applicant) for an Order granting
Development Consent for the Peak Cluster CCS Pipeline (the proposed
development)****Scoping consultation and notification of the applicant's contact details and
duty to make available information to the applicant if requested**

Thank you for consulting Staffordshire County Council on the Environmental Statement (ES) scope. We have reviewed the Environmental Impact Assessment Scoping report submitted by the applicant and have the following observations to make. For County functions where comments are not made below we are content with the ES scope.

Ecology, Landscape & Archaeology - Summary

- The scoping report identifies the correct guidance used to prepare the LVIA.
- The removal of hedgerows, hedgerow trees and dry stone walls should be avoided wherever possible.
- Re-routing the pipeline to avoid semi-mature/mature hedgerow and field trees and use of suitable trenchless installation techniques below hedgerows and stone walls would be supported.
- Where individual trees (i.e. not those in wooded areas) are removed to accommodate the development, replacement planting at a minimum ratio of 3:1 will be expected. It will be acceptable to include existing and replacement trees in

the biodiversity metric calculation, but this may not be used to justify a lower ratio for replacement.

- A landscape scheme showing the planting schedule, specification and maintenance/management for all planting will be required.
- The proposed viewpoints appear appropriate.
- Additional viewpoints within the Peak District National Park should be agreed with PDNP.
- Photomontages showing predicted views towards the facility and pipeline working areas from all agreed viewpoints will be required.
- An Arboricultural Impact Assessment and tree protection plan, prepared in accordance with British Standard BS5837:2012 Trees in relation to design, demolition and construction – Recommendations, is required for all retained semi-mature and mature trees within and adjacent to the development area.

Whilst the proposed scoping in of archaeology and the historic environment is welcomed and supported, our Historic Environment Team have provided some detailed comments/suggestions with regards to the proposed approach, including recommendations for geoarchaeological assessment, enhancing the non-intrusive archaeological surveys, trenching apparently 'blank' areas, and bolstering the likely mitigation requirements. Further guidance is provided with regards to the need to consider research priorities, public outreach and compensatory measures. Generally, ecology scoping and proposed surveys etc., are welcomed. We have suggested additional points regards new data on Ancient Woodlands, plus the need to consider veteran trees during survey, and site lighting impacts in the construction and operational phases.

Landscape

The scoping report identifies up-to-date guidance on landscape and visual impact assessment that will be followed in compiling the Environmental Topic Area: Landscape and Visual. Section 7 appears to align with the principles of best practice set out in GLVIA3, and by following this national guidance, all relevant impacts will be assessed in the Environmental Report. Night time effects have also been included. The appropriate landscape character types as identified in 'Planning for Landscape Change' have been correctly scoped in for both the Holcim Capture Facility and the Peak Cluster Pipeline.

The landscape policy objective for the identified character types is landscape maintenance. Under this objective, strong emphasis should be placed on ensuring that the development integrates discreetly within the landscape and avoids the loss of characteristic features. The Holcim Capture Facility will require careful consideration of location, layout, scale, height, and external finishes. All above-ground structures should use recessive colours, with colour samples submitted at application stage.

Landscape enhancements will be necessary, and mitigation is likely to include advance planting. A landscape scheme showing the planting schedule, specification, and management/maintenance requirements for all planting will be required. During pipeline construction, the route will intersect hedgerows and dry-stone walls. Removal of these features should be avoided wherever possible through re-routing or

by using a suitable trenchless installation technique. Where removal is unavoidable, reinstatement must be carried out promptly and to a high standard. Hedgerow semi-mature/mature hedgerow and field trees should be retained. Where removal of individual trees can be justified to accommodate the development, replacement tree planting at a ratio of 3:1 will be required.

The proposed viewpoints appear appropriate; however, additional viewpoints beyond 2 km may be beneficial. While the most sensitive views are expected to fall within the 2 km ZTV, depending on the final design, the facility may be visible from areas such as Onecote and Grindon. Additional viewpoints within the Peak District National Park should be agreed with PDNP. Photomontages showing predicted views towards the facility and pipeline working areas from all agreed viewpoints will be required, including any proposed mitigation and illustrating anticipated vegetation growth at defined intervals.

Ecology

Biodiversity Net Gain and the Avoid-Mitigate hierarchy

It is noted that mandatory BNG is expected to apply to NSIPs in the near future and that the Statutory Defra biodiversity metric will be used to assess whether mitigation or compensation is adequate. The metric, condition assessments (excel workbooks) and a net gain report should all be submitted.

As this is a large project, the applicant should also consider providing a draft Habitat Mitigation and Monitoring Plan) at the application stage.

Habitats Regulations Assessment

The intention to provide information to enable Habitats Regulations Assessment is welcomed.

Surveys etc

The suggested surveys, scope and compliance with industry standard methodologies are acceptable. The following information is recommended:

1. A desk study including detailed ecological records from Staffordshire Ecological Record

2. It should be noted that in Staffordshire and other counties, Ancient Woodland Inventories are being updated in conjunction with Natural England. This data has not yet been published but must be used to assess potential impacts, including air quality impacts and direct habitat impacts. In Staffordshire it is understood the process has added around 7000 new sites between 0.25ha and 2 ha to the inventory. The applicant may need to press NE to release the data urgently.
3. Surveys should cover veteran and near veteran trees as habitats in their own right, rather than solely as landscape features or bat / bird sites. Where veteran trees are identified further surveys for specialist invertebrates may be required. All veteran trees should be regarded as irreplaceable habitat (NPPF Section 15 paragraph 180 (c) applies.)
4. How the applicant proposes to avoid, mitigate and, where damage is unavoidable, compensate for, loss of habitats and features that support protected or priority species, in addition to BNG requirements,

General Considerations

External lighting should be installed on construction facilities, buildings and / or access routes and /or exterior spaces so that sites can be safely accessed and to prevent poor-quality floodlighting etc., being retrofitted which then disturbs bat flight routes. The applicant should ensure that contour diagrams are submitted that demonstrate minimal levels of lighting on receptor habitats such as hedges, trees.

Tree protection

An Arboricultural Impact Assessment should be prepared in accordance with British Standard BS5837:2012 Trees in relation to design, demolition and construction – Recommendations. This will identify semi-mature and mature trees for retention and assist when defining the pipeline route. Root protection areas should be shown on a tree protection plan for retained trees within and adjacent to the development area. Where individual trees need to be removed to accommodate the development, replacement planting will be expected at a ratio of 3:1.

Archaeology / Historic Environment

Staffordshire County Council's Historic Environment Team has reviewed the submitted Scoping Report, and we welcome and agree with the proposal that the impact on archaeology (known and potential), heritage assets (designated and non-designated), and historic landscape character will be scoped into the EIA. The means for doing this with regards to what will be included in the Preliminary Environmental Impact Report (PEIR) and/or the Environmental Statement, is generally supported, as is the proposed methodology for assessing the potential impact on designated heritage assets (i.e. scheduled monuments, listed buildings, conservation areas and registered

parks and gardens)- although we will defer to the relevant LPA Conservation Officers and Historic England (where appropriate) on these matters.

In terms of the proposed approach, largely in relation to the archaeological resource, we wish to raise some queries/concerns/suggestions:

- The extents of the proposed study areas (as outlined in Pars 10.3.5-9) are generally supported. However, there seems to be a contradiction elsewhere in the document with regards to the study area for below ground components (i.e. Pars 10.7.17 and 10.8.3) which propose a 500m study area rather than the 1km boundary proposed earlier in the document. A 1km study area would be our preference.
- In addition to the pipeline corridor, the archaeological assessment/evaluation work needs to include other elements of the proposed development, temporary or otherwise, where below ground (including soil stripping) impact is likely, including compounds, access tracks, laydown areas, storage areas etc.
- We would be keen for the desk-based assessment to also include/be informed by a palaeoenvironmental/geoarchaeological assessment. This would provide a baseline understanding of the palaeoenvironmental/geoarchaeological potential of the proposed route (and associated infrastructure etc.) and would inform the need and scope for further fieldwork and analysis in concert with/addition to those proposed.
- Whilst we welcome the proposal to undertake extensive geophysical survey to support the identification of previously unknown archaeological sites, given the scale of proposed development and the variability of the terrain, geologies, and indeed the often ephemeral nature of archaeology in a rural context, we are of the opinion that more thought should be given to employing an integrated suite of non-intrusive techniques, including the proposed geophysics, where deemed appropriate. This could include all, or a combination of, geophysical survey (e.g. magnetometry/ magnetic susceptibility as appropriate for the geologies/terrain etc.), geochemical analysis, UAV high-res LiDAR and multispectral surveys, fieldwalking (above and beyond what is likely to be carried out as part of the desk-based assessment walkover survey) and, potentially, metal detecting. Combined with an intelligent reading of the landscape (where areas of potential significance are identified), which should be included in the desk-based assessment, such an approach, should help ensure that the targeting of subsequent trial trenching is properly informed (rather than mainly relying on the results of magnetometry, the results of which can be hit and miss in certain geologies and can miss the aforementioned ephemeral rural archaeology), and ultimately help reduce the risk of encountering unexpected significant archaeology at the construction stage.
- With the trial trenching in mind, this shouldn't only focus on areas of archaeological potential identified through the desk-based assessment and non-intrusive works, and indeed previously unsurveyed areas (if applicable), this should also include a suitable sample of apparently 'blank' areas to test areas

where archaeology seems to be absent, and to evaluate the success of the non-intrusive evaluation work outlined above. Consideration should be given to undertaking some trial trenching (i.e. in areas where there are no access issues/other constraints) in advance of the formal granting of the DCO, this would further inform and enhance the baseline and highlight any risks and likely mitigation requirements at an early stage.

- Taking into account the fact that this development cuts across three Regional Archaeological Research Framework areas (i.e. East Midlands, West Midlands and North West), consideration should be given to the creation of a project specific bespoke set of research questions that should be addressed by the archaeological work. This would help focus research, resources and help target fieldwork. A good example of such an approach, although on a much larger scale, is the HS2 Phase One Historic Environment Research and Delivery Strategy (HERDS).
- The proposed mitigation options (i.e. Par 10.6.11) should be more comprehensive, for example it could also include strip, map and sample excavation and geoarchaeological/palaeoenvironmental sampling. Consideration should also be given to public benefit, outreach, and enhancements, compensatory measures, and conservation benefits that could be delivered as part of the proposed development.

Minerals & Waste

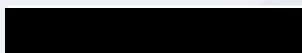
In relation to chapter 16 of the scoping report relating to the use of material and waste management we agree with those matters that are scoped into the EIA as indicated on tables 16-22 and 16-23.

In relation to the impact on the Cauldon cement works, the applicant should indicate what changes to the use of that works are required to accommodate the carbon capture plant.

Regarding changes in demand for aggregate minerals (materials), data will be available in the [annual reports](#) of the regional aggregate working parties and local aggregate assessments produced by the mineral planning authorities.

Regarding data on landfill void capacity, baseline data is sourced from the EA's 2024 Waste Summary Table for England (WDI), the applicant should also check if the recent West Midlands RTAB report is publicly available or can be obtained.

Yours sincerely


Principal Planning Policy Officer

From: [Buildings](#)
To: [Peak Cluster CCS Pipeline](#)
Subject: RE: EN0710001 - Peak Cluster CCS Pipeline - EIA Scoping Consultation and Notification
Date: 14 January 2026 11:42:53
Attachments: [image009.jpg](#)
[image010.png](#)
[image011.png](#)
[image013.png](#)
[image014.png](#)
[image015.png](#)
[image001.png](#)

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Hello,

Thank you for your email.

Staffordshire Fire and Rescue Service have no comments to be made regarding the consultation below.

Best Regards,


CPP Administrator - Protection
Central Prevent and Protect
Staffordshire Fire and Rescue Service HQ
Pirehill
Stone
Staffordshire
ST15 0BS

 [@staffordshirefire.gov.uk](mailto:buildings@staffordshirefire.gov.uk)

Visit our website for Safe and Well advice and guidance
www.staffordshirefire.gov.uk

final sig



From: Peak Cluster CCS Pipeline <PeakClusterCCS@planninginspectorate.gov.uk>
Sent: 13 January 2026 12:28
Subject: EN0710001 - Peak Cluster CCS Pipeline - EIA Scoping Consultation and Notification

Dear Sir/Madam

Please see attached correspondence on the proposed Peak Cluster CCS Pipeline.

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 February 2026. The deadline is a statutory requirement that cannot be extended. Further information is included within the attached letter.

Kind regards

[REDACTED]



[REDACTED] | Environmental Advisor
The Planning Inspectorate



@PINSgov



The Planning Inspectorate



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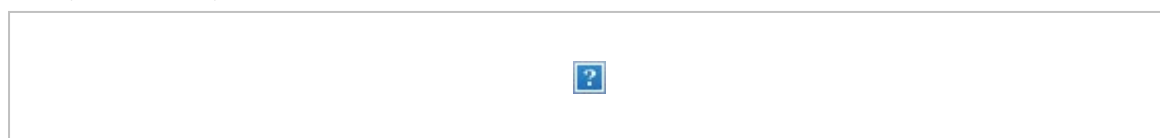
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DPC:76616c646f72



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From: [REDACTED]
To: [Peak Cluster CCS Pipeline](#)
Subject: EN0710001- Peak Cluster Pipeline - EIA Scoping Consultation and Notification
Date: 28 January 2026 10:31:45

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Good morning [REDACTED] – further to your email of 13th January 2026 please see below our comments on the proposals. I tried sending these directly to [REDACTED] (the applicant) this morning but got a notification that his in box is not available. If you are not the correct recipient could you please let me know who they should be sent to.

- Pipeline alignment and construction impacts

Early indications suggest that the proposed underground CO₂ pipeline may pass through or close to Disley and the High Lane edge. If this is confirmed, construction vehicle movements, abnormal loads and spoil removal are likely to rely heavily on the A6 corridor unless alternative routing is identified. Given existing pressures on the A6, any future proposal will need to demonstrate:

- a robust construction traffic management plan
- restrictions on peak hour operations
- mitigation measures for sensitive locations, including schools and constrained junctions

- Relationship with strategic transport proposals

Although the High Lane–Disley bypass is not currently funded, safeguarding work and early alignment considerations remain active within the draft LTP. The pipeline corridor has the potential to constrain future strategic transport options. We therefore need to emphasise the requirement for the promoter to formally consult with us on route protection and ensure the scheme does not prejudice long term transport infrastructure planning.

- Environmental scoping and cumulative impacts

Given the scale of the pipeline and its cross boundary implications, early engagement with SMBC is essential. The promoter should be advised that environmental scoping must fully capture highway impacts, cumulative effects, and interactions with other planned or emerging infrastructure.

Kind regards

[REDACTED] – Senior Planning Officer
Development Management
Growth - Services to Place
Stockport Council
Stopford House
Piccadilly
Stockport
SK1 3XE

TEL: [REDACTED]

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City of
Stoke-on-Trent

**Housing,
Regeneration &
Operations**
Civic Centre
Glebe Street
Stoke-on-Trent
ST4 1HH

Planning Inspectorate
Environmental Services, Infrastructure Decisions And Applications Services, C/o Quadient, 69 Buckingham Avenue
Slough
SL1 4PN

Reference Number: Our ref: 26/SCP/00052 - Your ref: EN0710001
Location: Peak Cluster Ccs Pipeline, Derbyshire And Staffordshire,
Description: ES Scoping Consultation

Dear Sir/Madam

I refer to your recent request for a consultation response relating to the above.

Stoke-on-Trent City Council do not have any comments to make.

Yours sincerely,


Senior Planning Officer, Development Management
@stoke.gov.uk | 

From: clerk@taddingtonparishcouncil.org.uk
To: [Peak Cluster CCS Pipeline](#)
Subject: EN0710001
Date: 19 January 2026 12:48:04

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Dear Sir/Madam,

I hope this reaches you well. We have received a letter as a relevant consultation body in relation to the Peak Cluster CCC Pipeline.

I am writing to confirm that Taddington and Priestcliffe Parish Council have no objections to the application made. If any further information is required, please do not hesitate to get in touch.

Kind Regards,

Parish Clerk

Clerk to Taddington and Priestcliffe Parish Council

website: www.taddingtonparishcouncil.org.uk

email: clerk@taddingtonparishcouncil.org.uk

From: [REDACTED]
To: [Peak Cluster CCS Pipeline](#)
Cc: [REDACTED]
Subject: RE: EN0710001 - Peak Cluster CCS Pipeline - EIA Scoping Consultation and Notification
Date: 10 February 2026 14:23:25
Attachments: [image003.jpg](#)
[image008.png](#)
[image009.png](#)
[image011.png](#)
[image012.png](#)
[image013.png](#)
[image001.png](#)
[Letter to stat cons_Scoping & Reg 11 Notification.pdf](#)

You don't often get email from [REDACTED]@trinityhouse.co.uk. [Learn why this is important](#)

Good afternoon [REDACTED],

I can confirm that Trinity House is content with the Scoping Report and has no further comments to add.

Kind regards,

[REDACTED]
Navigation Services Manager | Navigation Directorate | Trinity House
[REDACTED]@trinityhouse.co.uk | [REDACTED]
www.trinityhouse.co.uk



From: Peak Cluster CCS Pipeline <PeakClusterCCS@planninginspectorate.gov.uk>
Sent: 13 January 2026 14:29
To: Navigation <navigation.directorate@trinityhouse.co.uk>
Cc: [REDACTED]@trinityhouse.co.uk
Subject: EN0710001 - Peak Cluster CCS Pipeline - EIA Scoping Consultation and Notification

Dear Sir/Madam

FAO: [REDACTED] (Navigation Services Officer)

Please see attached correspondence on the proposed Peak Cluster CCS Pipeline.

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 February 2026. The deadline is a statutory requirement that cannot be extended.

Further information is included within the attached letter.

Kind regards

[REDACTED]



[REDACTED] | Environmental Advisor
The Planning Inspectorate



@PINSgov



The Planning Inspectorate



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East annexe
Town Hall
Sankey Street
Warrington WA1 1UH

Development Manager

From: [REDACTED]
To: [Peak Cluster CCS Pipeline](#)
Cc: [REDACTED]
Subject: RE: EN0710001 - Peak Cluster CCS Pipeline - EIA Scoping Consultation and Notification
Date: 14 January 2026 11:14:14
Attachments: [image003.png](#)
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Good morning,

Thank you for sharing the proposals with West Midlands Ambulance Service(WMAS).
I have had a read of the proposals and have no specific objections to the plan on behalf of WMAS.

Please let me know if there is anything further that you would need our input for.

[REDACTED]

[REDACTED]

Emergency Preparedness Manager
Operational NILO
Coventry, Warwickshire and Staffordshire



Phone [REDACTED]
Office [REDACTED]
email [REDACTED]@wmas.nhs.uk
ISSI [REDACTED]
Call sign [REDACTED]

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From: Peak Cluster CCS Pipeline <PeakClusterCCS@planninginspectorate.gov.uk>
Sent: 13 January 2026 12:28
Subject: EN0710001 - Peak Cluster CCS Pipeline - EIA Scoping Consultation and Notification

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Dear Sir/Madam

Please see attached correspondence on the proposed Peak Cluster CCS Pipeline.

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 February 2026. The deadline is a statutory requirement that cannot be extended. Further information is included within the attached letter.

Kind regards



 | Environmental Advisor
The Planning Inspectorate



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W

Wirral Council

[REDACTED]
Assistant Director
Regeneration & Place
PO Box 290
Brighton Street
Wallasey
CH27 9FQ

To

[REDACTED]
Senior Environmental Advisor
Environmental Services
Infrastructure Decisions and Applications Service
Planning Inspectorate
c/o QUADIENT
69 Buckingham Avenue
Slough
SL1 4P

Date: 10 February 2026

PINS ref: EN0710001

Dear [REDACTED],

Please find below Wirral Council's consultation response for consideration as part of your Scoping Opinion on the applicant's, Peak Cluster's, Scoping Report.

Proposed Development

The Environmental Statement that supports the development consent order must contain the information specified in regulation 18(3) of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 and must meet the requirements of regulation 18(4). It must also include any additional information specified in Schedule 4 to the 2017 Regulations which is relevant to the specific characteristics of this proposal and to the environmental features likely to be significantly affected. It should include the following sections as a minimum:

- A non-technical summary;
- Detailed scope of works;
- Reference to key plans and legislation. It is essential that all relevant guidance and policies be complied with as appropriate;
- Detailed baseline review (associated with all development issues); and
- Detailed integrated assessment of all environmental impacts. This assessment needs to take into account the nature of impact (importance, magnitude and duration – quantified as appropriate), reversibility of impact, mitigation, monitoring measures (including reference to long-term management and maintenance measures/plans) and residual impacts

The EIA scoping boundary currently includes all anticipated siting and routing configurations that could be developed within the pipeline corridor and associated

development, with the exception of mitigation land, off route construction access roads and connections to local utilities that may be required. The sections of the scoping boundary being considered as part of Wirral's consultation response fall within the jurisdiction and administrative boundaries of Wirral Borough Council. These sections being Section 9 -Willaston North to North Wirral Coastal Path (including Coastal Above Ground Installation (AGI)) and Section 10 – North Wirral Coastal Path to Mean Low Water Springs (MLWS), as shown on Figure 4.1 (page 51 of Environmental Impact Assessment – Scoping Report Volume 1).

The EIA Scoping Report refers to all these elements which is welcomed.

EIA Structure and Methodology

It is important that the conclusions of the environmental impact assessment are transparent and that all information used to draw conclusions is clearly presented and objective (including survey/assessment results) to enable third party verification. The applicant is proposing to consult best practice guidance to assist in preparing the EIA methodology and Environmental Statement (ES) - and this is welcomed. The proposed structure of the ES as put forward by Peak Cluster includes the following chapters:

- Chapter 1: Introduction;
- Chapter 2: Legislation and Planning Policy;
- Chapter 3: The Proposed Development;
- Chapter 4: EIA Approach and Methodology;
- Chapter 5: Air Quality;
- Chapter 6: Biodiversity;
- Chapter 7: Landscape and Visual;
- Chapter 8: Traffic and Movement;
- Chapter 9: Noise and Vibration;
- Chapter 10: Historic Environment;
- Chapter 11: Water Environment and Flood Risk;
- Chapter 12: Marine Environment;
- Chapter 13: Geology and Ground Conditions;
- Chapter 14: Socio-Economics;
- Chapter 15: Human Health;
- Chapter 16: Materials and Waste;
- Chapter 17: Climate Change;
- Chapter 18: Major Accidents and Disasters;
- Chapter 19: Cumulative Effects; and
- Chapter 20: Summary and Next Steps.

Appropriate consultation has been undertaken with relevant stakeholders based on the characteristics of the site and the relevant legislation. Specific comments are provided below.

It is noted that within each of these topics some areas will be scoped out.

It is understood that, where appropriate, the Environmental Statement will distinguish between likely significant effects associated with different sections of the scheme,

within the individual topic chapters. It is agreed that this is a sensible approach and may assist in determining the cumulative impacts of the scheme.

It is noted that a Preliminary Environmental Information Report (PEIR) stage will be undertaken as part of the statutory consultation. Clarification is sought on whether it is the project intent to agree an Evidence Plan with the Statutory Nature Conservation Bodies (SNCBs).

It is unclear whether the Peak Cluster CCS and Morecambe Net Zero projects are co-dependent on both being granted Development Consent. Clarification is also sought on timing for both NSIP projects given “deemed consent” considerations i.e. are the project advancing concurrently?

The scoping boundary relates to the terrestrial environment and options for Coastal AGI to MLSW. It is understood that the development partner Morecambe Net Zero, which is a separate project will provide the marine elements of the project inclusive of sub-sea pipeline and below-seabed CO₂ CCS chambers in the depleted gas fields. The Scoping Report does not include a map of the whole scheme which would be beneficial as evidence for how the marine, intertidal and terrestrial elements operate together as one cannot exist without the other to meet project objectives (i.e. mutually dependent).

Rochdale Principle and Design Parameters

Section 3.3 states that the design envelope will follow the Rochdale principles and design parameters approach, whereby the worst-case scenario is being assessed. If the design changes within this design envelope, then the impacts are deemed to have been assessed. If the design changes significantly then further consultation will be required. This follows best practice for EIA development. We request that Wirral Council should be informed of any changes to the design so it can consider whether these would be considered significant in terms of the regulations.

Strategic alternatives

The EIA Scoping Report, sections 1.2.3, 3.4 and 12.1.2, does not adequately set out the Strategic Opportunity Area selection process and method use for the whole project (terrestrial elements of the scheme in the Red Line Boundary) and the marine elements including:

- Assessment of alternative Coastal AGIs and subsea pipelines;
- Location of CCS storage chambers from existing gas infrastructure and pipeline route constraints on land and at sea;
- Length of sub-sea pipelines to CCS chambers; and
- Opportunities to utilise existing subsea pipeline infrastructure.
- Opportunities for synergies with other NSIPs, such as Hynet.

Wirral Council has sought advice from its ecological advisor, Merseyside Environmental Advisory Service (MEAS). On the basis of this advice, Wirral Council considers there is insufficient evidence and justification set out in the Design Evolution and Consideration of Alternatives section to justify selection of the Strategic Opportunity Corridor red line boundary. A detailed consideration of alternatives including an agreed multi-criteria assessment is required and given the development

footprint and proximity to international nature conservation designations, that is necessary as evidence of the basis of scoping boundary selection for the whole project.

Wirral Council also considers on the basis of MEAS advice that the Strategic Opportunity Corridor (SOC) should also consider existing critical infrastructure such as cables and pipelines – a map of existing critical infrastructure was not located. This should include mapping of constraints, other planned projects, accepting stage of maturity, (e.g. Hynet, noting Mersey Tidal scoping boundary is included) and existing below-ground infrastructure such as HVDC cable, other background projects for electricity cables and pipelines as these may constrain micro-selection of pipeline route. This may become an important consideration given land area available and environmental receptor sensitivity as it may limit options for mitigation, micro-routeing and may have potential to increase cumulative risks such as construction effects and potential land sterilization.

Consideration of Alternatives

Section 3.4 'design evolution and consideration of alternatives' state the scoping boundary has been identified following optioneering work undertaken by the applicant. This is summarised within the EIA report which states that a full description of the design evolution and assessment of alternative options will be presented in detail in the Assessment of Alternatives for the PEIR and ES.

This is required for EIA and HRA purposes and Wirral Council considers that this should include mapping of different pipeline routes as well as AGI landfall/inland options to demonstrate no reasonable alternative exists. Options should be presented alongside a matrix assessment (or equivalent) of the different options against the considerations and criteria discussed below which should be fully outlined.

Section 3.4 states that strategic options/alternatives have been developed and the EIA report notes this is to allow:

“...the identification of the potential landfalls and Strategic Opportunity Corridor (SOC) between sources of CO₂ from the Peak Cluster partner sites and the MNZ transportation and storage facilities in the East Irish Sea. The SOC options are wide corridors within which a CO₂ pipeline could be routed. The identification of the landfalls and SOC options were guided by a selection of environmental, land and engineering constraints and focused on the North West of England and North Wales and their coastlines.”

Full details of the Strategic Opportunity Corridor selection process is required to understand fully why Wirral has been chosen as the preferred landfall and SOC option. The EIA report briefly states this is because Wirral best met 'Project Value Measures' however it is not entirely clear what these are or how they were chosen.

The EIA report does advise that options have been considered which best:

- minimise interaction with National Parks (except for the unavoidable section of the PDNP which is common to all SOC options) and National Landscape areas,

which have the highest status of protection in relation to landscape and natural beauty (other than a short, unavoidable, connection to the Breedon site), in line with NPS EN-1;

- minimise potential for impacts to International Conservation Designations, which are afforded the highest level of biodiversity protection, through use of trenchless techniques to minimise works within the Dee Estuary SAC, in line with NPS EN-1;
- minimise impacts upon BMV agricultural land (defined as land in grades 1, 2 and 3a of the Agricultural Land Classification), through routing to avoid grade 1 land, where possible; and
- avoid substantial harm to, or loss of significance of assets of the highest significance, through the avoidance of direct impacts upon high value heritage assets, in line with NPS EN-1.

Further, the EIA report states pipeline routing was identified within an area of search (plate 3-10) taking into account national and international conservation designations, BMV agricultural land, water resources, water environment, flood risk, Green Belt, green space and peat soils as well as existing infrastructure.

Taking into account the above considerations, the Council wishes to highlight the following :

- The Hynet North West Hydrogen pipeline should be considered through optioneering/micro-routing process and alignment with such existing or proposed routes be weighted appropriately highly within the Project Value Measures to reduce environmental impact;
- The majority of the proposed pipeline routes through BMV land in Wirral;
- The proposed landfall and inland zones are either national and international conservation designations or functionally linked habitat;
- The majority of the route and AGI landfall/inland areas is within Green Belt;
- The proposed landfall AGI location is within the River Birket floodplain (Flood Zone 3) and areas of the inland AGI location are also at flood risk;
- These locations are locally prioritised for nature recovery in the Local Plan – River Birket Corridor Focus Area Nature Improvement Area;
- The landfall AGI comprises ‘Hoylake Carrs’ which is an EA funded natural flood management programme led by Cheshire Wildlife Trust and Wirral Council seeking to restore and enhance biodiversity across this area close to Meols and Hoylake.

It is considered by the Council that reasonable alternatives may exist, and the areas proposed for the pipeline and AGI locations are highly sensitive and do not constitute the route of least environmental impact in line with the parameters set out in the EIA report.

The Council is concerned that there is no transparency to this process as the alternatives have not been presented in the scoping report. Given the significance of the proposal, It is considered that alternatives should have been presented at this stage to enable relevant stakeholders to comment on alternatives before PEIR or Full EIA stage. It is also not clear what the project value measures are, again lacking in

transparency, or as set out in paragraphs 17 and 18 whether all alternatives have been assessed to the same degree of scrutiny.

TOPICS

A review of the various topics has been undertaken to critically review the submitted information.

Chapter 5: Air Quality

Wirral Council's Environment Health department have been consulted.

The approach set out with Chapter 5 of the scoping report is deemed as broadly appropriate, outlining the relevant statutory provisions in relation to Air Quality. Wirral Council request that the Wirral Council Air Quality Strategy 2024 – 2028 continue to be used in the preparation of the Environmental Statement.

The Study Area in 5.3.3 is to comprise buffers, including 2km buffer for operational human health receptors and 10km buffer for internationally and nationally designated ecological receptors. These should be clearly mapped out in the Environmental Statement, showing which urban settlements and ecological features/sites could be impacted upon in terms of any changes to air quality.

Having regard to the Baseline, Wirral Council notes that there is suggestion that the Annual Status Report (ASR) will be considered in order to establish a baseline level for Air Quality. It should, however, be noted that currently there is limited monitoring undertaken in Moreton and no monitoring undertaken in Meols (these being the proposed sites for the Coastal AGI facility). Wirral Council therefore query the validity of using this report to establish baseline details in these areas. It may be that specific monitoring would be required in these areas to establish a more realistic baseline.

Currently, Wirral's air pollution monitoring network focuses on monitoring nitrogen dioxide and particulate matter pollutant levels linked to road traffic emissions, as this represents the main issue faced by Wirral, and most other UK local authorities. The baseline assessments to be included with the ES should be divided to include specific and individual assessments relating to the relevant section(s) of the pipeline and local authority boundary they sit within.

Wirral Council are satisfied with the definitions set out in paragraphs 5.4.6 -7 for sensitive human receptors and ecological receptors.

Besides those identified for Coastal AGI to MLWS Pipeline, no details of likely receptors for remainder of pipeline within Wirral Borough. These will need to be clearly set out and identified within Environmental Statement, having formed part of baseline assessment, and in order to determine impact upon receptors.

Table 5-12: Air Quality Scope – Coastal AGI to MLWS Pipeline(s) states that due to the nature of the Coastal AGI no operational emissions are anticipated and as such have been scoped out for pipeline and Coastal AGI. The coastal AGI will,

however, include an up to a 50m high ventilation stack. No information has been provided as to the operation of the Coast AGI, but the need for a ventilation stack of this scale, would suggest that some type of emissions will occur from its operation. No information has been provided as to what is to be emitted from the stack, or when and how often the stack will in operation. Wirral Council request that the Coastal AGI be scoped in and its impacts on sensitive receptors (human and ecological) are fully considered within the ES, using the methodology as set out in paragraphs 5.6.3 - 5.6.17 of this scoping report (including any subsequent amendments to the methodology resulting from PINS having provided their scoping opinion), and that if necessary any mitigation be clearly set out within the ES.

Chapter 6: Biodiversity

MEAS as Wirral's ecological advisor has been consulted. In addition, Wirral's Biodiversity Net Gain Coordinator has been consulted.

MEAS's comments are as follows:

Habitats Regulations Assessment and Designated Sites

Figure 1.4G shows the red line scoping boundary is within, adjacent or within 15km to the following national and international sites in Liverpool City Region. These sites are protected under the Conservation of Habitats & Species Regulations 2017 (as amended) and Local Plan WD 3 applies:

- Sefton Coast SAC;
- Ribble and Alt Estuaries SPA;
- Ribble and Alt Estuaries Ramsar site;
- Mersey Narrows and North Wirral Foreshore SPA;
- Mersey Narrows and North Wirral Foreshore Ramsar site;
- Martin Mere SPA;
- Martin Mere Ramsar site;
- Dee Estuary SAC;
- Dee Estuary SPA;
- Dee Estuary Ramsar site;
- Mersey Estuary SPA;
- Mersey Estuary Ramsar site;
- Liverpool Bay SPA.

MEAS have considered the proposals and the possibility of likely significant effects on sites using the source-pathway-receptor model. There are construction, operational, maintenance and decommissioning phase pathways between the proposals and the national and international sites, therefore, the Council considers that the proposal requires Habitats Regulations Assessment for likely significant effects. The Assessment of Likely Significant Effects must be carried out **prior to determination of the Development Consent Order (DCO)**.

Sites of Special Scientific Interest

The development site is within the following statutory designated sites and Local Plan policy WD 3 applies:

- North Wirral Foreshore SSSI;
- Meols Meadow SSSI;

- Thurstaston Common SSSI.

Thurstaston Common SSSI is one of the largest lowland heathlands in the region and unit 4 is within the scoping boundary route of the peak cluster pipeline. This unit is in 'Unfavourable – Recovery' condition (03/12/2021) mainly due to ongoing issue of scrub encroachment. Meols Meadow SSSI is assessed as 'Unfavourable – No change' (27/10/2022) with reason for adverse condition due to inappropriate cutting/mowing. The applicant should consider how effects on these sites will be avoided, minimised and mitigated. If adverse effects cannot be avoided, options for compensation should be identified (NPPF paragraph 193). Proposals should only be taken forward where the benefits of the development clearly outweigh the effects on habitats and species. North Wirral Foreshore SSSI shares similar features to the Mersey Narrows and North Wirral Foreshore SPA/Ramsar sites.

At the point where the proposed landfall AGI at land east of Meols meets the Coast, the intertidal area is SAC, SPA, Ramsar and SSSI designated. Unit 2 of North Wirral Foreshore SSSI is assessed as 'Unfavourable – Declining' (23/12/2012). Reasons stated:

“Following assessment of bird numbers during October 2012 Turnstone and Bar-tailed Godwit have both been found to be unfavourable. Turnstone numbers have declined due to a loss of feeding habitat at Egremont Foreshore, Mersey Narrows SSSI, this is currently being investigated. There is circumstantial evidence that Bar-tailed Godwit numbers have declined due to disturbance and they have been displaced from the roost at North Wirral Foreshore and move to other sites during the high tide.”

Local Sites

The scoping boundary is within, adjacent and near to a network of Local Wildlife and Geological Sites. Local Plan policy WD 3 applies and as outlined in paragraph 10, the mitigation hierarchy should be followed with emphasis on avoidance and minimisation of impact.

Impact to Local Sites (wildlife and geological) are not considered in the EIA report. Wirral has a network of 71 Local Wildlife Sites (LWS) with 53 sites within the rural Green Belt most impacted by the proposed pipeline route. Local Site information in Wirral is held and managed by Cheshire Wildlife Trust and Wirral Wildlife who should be consulted. Local Sites should be scoped in and the Council considers that a full local site impact assessment should be undertaken as part of the EclA process.

The proposed AGI offshore CO2 transportation connection is within an intertidal area (mudflats and saltmarsh) of national and international importance for waterbirds. The landfall and inland AGI zones are functionally linked habitat.

Section 6.6 'identification of potential effects' (and Chapter 12) outline impact pathways relating to the construction, operational and decommissioning phases. These pathways are accepted with addition of:

- Loss of prey availability e.g. bivalves, lugworms in the intertidal zone;
- Bird strike risk - Figure 7.4e shows 4 x proposed stack locations at the landfall and inland AGI locations.

Chapter 6 recognises the presence of the above sites and other national and international sites within a 15km study area. See Tables 6-4 to 6-7. Further, section 6.10 (Habitats Regulations Assessment) outlines sites within the Liverpool City Region which are scoped in for further assessment. This is accepted.

The EIA report confirms a “Test of Likely Significant Effects Report” will be produced at the PEIR stage, and this will be updated as necessary for DCO application and will form part of a report to inform Appropriate Assessment, if required. This is accepted and the Council fully anticipates that Appropriate Assessment will be required.

HRA stage 3: Assessment of Alternatives may be required If adverse effects cannot be ruled out even with mitigation; and stage 4 (Imperative Reasons of Overriding Public Interest (IROPI) & Compensatory Measures) if no alternatives exist and the project must proceed for imperative reasons to ensure the overall coherence of the network of sites is protected. There is further assessment of alternatives below.

Ecology

Desktop Study

The environmental baseline is informed by a desk-based study based on national datasets. A more detailed study will be undertaken for the PEIR/EcIA and will inform survey and assessment. The EIA report confirms this will include records obtained from LERCs, WeBS and local specialist bird groups. This is welcomed and accepted. Cheshire Record is the LERC for Wirral: RECORD Home

Local Stakeholders

The Council strongly recommend engagement with local groups. Other local groups such as Wirral and Cheshire Badger Group, Wirral Wildlife, Wirral Amphibian and Reptile Group (ARG) and Wirral Barn Owl Trust must be consulted to inform desktop assessment, survey effort and mitigation and compensation measures.

Irreplaceable and Priority Habitat

Chapter 6 includes a list of Ancient Woodland within the pipeline route. It is not clear from this high-level assessment whether the updated Ancient Woodland inventory data has been accessed. This was recently completed by Cheshire Record and has led to additional woodlands in Wirral (and Cheshire) being identified as Ancient Woodland.

The Priority Habitat assessment is limited to national data. The Council consider that the PEIR and EcIA should be informed by local habitat where this is available. In the Liverpool City Region, Merseyside BioBank holds ecological network data which includes Wirral and Cheshire Wildlife Trust also hold habitat data. This should be accessed to ensure impact to Priority Habitat and Local BAP Habitats are fully assessed.

It is noted that several habitats listed as Priority Habitat in the table (page140) are also irreplaceable habitat. In Wirral this could include veteran trees, coastal sand dunes or old/ancient grasslands, for example. Lowland heathland is also locally rare comprising <1% of broad habitat types in the City Region. The Liverpool City Region State of

Nature Report provides important context in terms of local habitat and species trends and condition of designated sites. This should inform pipeline route selection. Section 6.8 outlines planned habitat surveys. This comprises:

- UKHab survey of scoping boundary and desktop habitat mapping using national datasets of scoping boundary plus 250m buffer to target survey;
- Surveys subsequently to be focused where permanent capture facilities and AGIs may be located;
- Habitat condition assessments to inform BNG assessment.
-

The landfall AGI location and survey of Meols Meadow SSSI and Thurstaston Common SSSI as well as other areas of higher botanical interest will require Phase 2 NVC survey by a suitably qualified botanist (FISC Level 5+). Botanical interest of arable field margins also should not be overlooked.

Wirral Council has recently undertaken a survey of saltmarsh at Hoylake as part of beach management plans and Natural England undertakes SSSI monitoring survey of the North Wirral Foreshore. It is recommended that access to this information is requested to inform botanical assessment.

Where watercourses are impacted Modular River Physical (MoRPh) survey may be required to inform BNG assessment.

Protected and Priority Species

Ecology Scope

Tables 6-10 to 6-12 scopes in/out ecological receptors for further assessment. The Council agree with the majority of receptors scoped in for EcIA with the exception of natterjack toad and brown hare which are omitted.

Natterjack toad are known to be present at Red Rocks and Hoylake and habitat at the landfall AGI location may be suitable for this European Protected Species. Survey is required and the Council strongly recommends liaison with Wirral ARG who recently confirmed breeding natterjack toad at Hoylake Beach c.2.8km to the west of the landfall AGI.

Farmland areas within the scoping boundary is important for brown hare which is a Priority Species. Transect surveys are therefore required.

In relation to breeding bird surveys, section 6.8 states *“Additional breeding bird surveys will be undertaken in locations which support habitats (river valleys, ancient woodland and large waterbodies) which can be important to rare breeding birds, e.g. wood warbler, lesser spotted woodpecker Dendrocopos minor, grasshopper warbler Locustella naevia, cuckoo Cuculus canorus and Cetti’s warbler Cettia cetti.”*

The Council considers the approach to breeding bird survey overlooks the importance of farmland bird species and important assemblages of S41 species e.g. skylark, grey partridge, yellowhammer etc. and Amber/Red List species. These birds depend on the farmland areas identified within the scoping boundary and as such should be prioritised within planned survey effort. Farmland breeding bird survey should therefore be scoped in.

Further, Wirral is important for barn owl and targeted survey is likely to be required. The Council recommends consultation with Wirral Barn Owl Trust to inform survey effort and mitigation measures.

Wirral is a stronghold for badger. The Council strongly encourages liaison with the Wirral and Cheshire Badger Group who monitor setts and activity across the borough on an annual basis.

Otter are known to be recolonising watercourses across the subregion including Wirral. The Council strongly recommends consultation with Mersey Rivers Trust when undertaking watercourse impact assessment.

Passage and Wintering Bird Survey

Section 6.8 outlines planned survey effort for passage and wintering birds. In summary this comprises:

- Passage and wintering bird surveys – commenced in October 2025 (from PROW only) comprising:
 - Monthly High and Low Tide WeBS counts at Hoylake between October 25 and April 26 inclusive (A transect that runs for 1km beyond the Scoping Boundary will be walked during the two-hour window either side of high or low tide – walked in the opposite direction each month)
 - Functionally Linked Land Surveys - Monthly high and low tide functionally linked land walkover surveys will be performed along the length of the Wirral peninsula from where the scheme makes landfall south to the M56. Surveys will be conducted between October 25 and April 26 inclusive
 - Nocturnal Surveys - Monthly high and low tide nocturnal surveys will be performed in the fields around the proposed compressor station locations at Hoylake. Surveys will be conducted between October 2025 and April 2026 inclusive

It is noted that the proposed survey refers to Hoylake. Whilst there is an impact pathway to birds at Hoylake, the landfall location is at Meols so survey should primarily cover this area.

One year of passage and wintering bird survey is proposed. However, given the scale and nature of proposals, 2 years of survey covering the spring/autumn passage and wintering bird period would be required as a minimum to allow for variation of bird use between years and other variables (e.g. weather and access issues). NatureScot guidelines are best practice and should be used to inform survey scope. As outlined in the EIA report, surveys should be accompanied by an ornithological desktop assessment. This assessment should be informed by WeBS online and core count data supplemented by LERC data and information held by local groups (referred to below) to help establish a robust approach to assessment.

Where vantage point or transect survey from PROW is limited and views are impaired, alternative access arrangements should be made to ensure findings are

representative of bird use of the site/area. Survey over multiple years accounts for such limitations.

The proposed landfall and inland AGI zones include agricultural land which is known to be functionally linked habitat. To help inform ornithological assessment and characterise the use of these areas the applicant should consult with local WeBS coordinators, Cheshire and Wirral Ornithological Society and refer to the following documents to inform their assessment:

- NECR483 Edition 1 Identification of Functionally Linked Land in the North West of England – Phase 2 (NECR483)
- Review and analysis of changes in waterbird use of the Mersey Estuary SPA, Mersey Narrows & North Wirral Foreshore pSPA and Ribble & Alt Estuaries SPA (NECR173)

This information and local knowledge will help establish areas where SPA/Ramsar birds are known to roost and forage outside of national and international sites, target survey activity and mitigation and compensation measures.

Biodiversity Net Gain

Section 6.11 recognises that 10% BNG for NSIPs will become mandatory in May 2026. A BNG assessment demonstrating how 10% BNG will be provided will be undertaken as part of the EclA. The Council will comment further once details are known however, in line with the BNG Hierarchy it is recommended BNG onsite provision is prioritised and retention/enhancement of medium and higher distinctiveness habitats. Any offsite provision should be delivered within Wirral.

Local Nature Recovery Strategy

The Liverpool City Region LNRS will be adopted in March 2026. The applicant should therefore use the LNRS local habitat map to inform their BNG assessment and wider ecological mitigation and compensation strategy. Additionally, the LNRS includes a long/short list of species which (alongside Cheshire BAP) are considered to be of County Level importance. This information should be used to inform EclA.

Wirral's BNG Coordinator comments on biodiversity impacts as follows:

It is noted that the following comments of Wirral's internal BNG Coordinator may differ on some aspects to that of MEAS's, however, it should be stressed that there has been insufficient time to resolve these differences and further engagement is required. The Council, not having been able to fully consider the biodiversity impacts of the project upon the Borough, reserves the right to submit further comments at a later date.

Several critical ecological aspects appear to be inadequately scoped within Chapter 6, particularly in relation to birds, coastal ecology, sensitive habitats, water vole, Local Wildlife Sites (LWS) and ancient woodland.

The scoping boundary also excludes certain secondary areas such as access routes, compounds and mitigation land which may result in significant ecological impacts not being captured at this stage.

Wintering Birds

The scoping report states that wintering bird surveys will be undertaken from public rights of way (PROW) where access is possible. This approach is insufficient, particularly on the Wirral where PROW access is extremely limited and does not reflect bird use of estuary habitats, coastal marshes or functionally linked land such as Hoylake Carrs. A minimum of two full winters of survey effort, access to private land and full vantage point mapping is required for a robust assessment.

Coastal AGI Ventilation Stack

No bird collision risk or displacement assessment has been proposed in relation to the 50 m vent stack. Given its height and proximity to internationally designated sites and functionally linked habitats, this is a major omission and will need full consideration.

Water Voles

Although the chapter refers generically to protected species surveys, we want to ensure targeted water vole surveys are included, particularly in the Wirral coastal section where landscape features provide suitable habitat. Current scoping commitments do not provide this clarity.

UKHab and NVC Surveys:

While a UKHab survey is proposed along the draft Order Limits, this is likely too narrow given that Order Limits may shift and that ancillary land is not included within the current boundary. A full UKHab survey across the full 300 m scoping corridor and NVC surveys for all semi natural priority habitats will be required to identify habitat sensitivity, assess losses and inform Biodiversity Net Gain.

Ancient Woodland Data

Ancient woodland within 2 km is acknowledged, but the scoping report does not commit to using the most up to date local LERC datasets. Given the sensitivity and legal weight of ancient woodland, updated local data must be incorporated to correctly identify constraints and avoidance measures.

Cumulative Effects

Given the number of concurrent and upcoming local schemes both coastal and inland cumulative effects must be explicitly scoped in rather than deferred. This is especially important for coastal birds, hydrological features and habitats where combined pressures may be significant.

Chapter 7: Landscape and Visual

Wirral Council do not consider they have had sufficient time to consider the Landscape and Visual impacts of the project upon the Borough and especially given the proposed erection of the Coastal AGI. This should be regarded as a holding response on these matters and the Council therefore reserves the right to submit further comments at a later date.

There are three Areas of Special Landscape Value which fall within or in close proximity to the scoping corridor. LAN-SA8.2 which stretches from Willow Lane to Brimstage. The corridor would intersect this towards its middle, running its full

length in a south to north direction. The second being LAN-SA8.3 which the scoping corridor intersects along Mill Hill Road up to its junction with Hillbark Road. Lastly, LAN-SA8.1, which flanks the western side of the Borough encompassing both land and the River Dee. This, however, would sit outside the scoping corridor.

Whilst there may be some visual impact during construction, with the pipeline being situated underground, it is not anticipated that there will be any long-lasting visual impact to the Areas of Special Landscape Value. However, in the absence of any detail at this stage the Council cannot be certain of this. It is noted that scoping has not included off route construction access roads and connections to local utilities, and what if any above ground works these may comprise, their permanence, or their visual impact. Wirral Council therefore ask that such works form part of the scoping for the Environmental Statement (ES), and their visual impact upon any Areas of Special Landscape Value be assessed and included within the ES.

The only above ground works we are currently aware of is the construction of the Coastal AGI. it is to comprise a ventilation stack up to a height of 50m. The exact siting of the Coastal AGI is currently unknown, with a number of site options being considered ('landfall zone and 'inland zone') as showing on Plate 3-6: Landfall and Inland Zones within the scoping report. Whilst not sitting within an Area of Special Landscape Value, the siting of the Coastal AGI is in relative close proximity to LAN-SA8.1 to its west.

There is particular concern relating to the height of the ventilation stack, however, of knowing the exact location of the Coastal AGI, the Council are unable to determine what impacts it will have on Areas of Special Landscape Value. The Council is also unable to determine what impact the introduction of the Coastal AGI would have on views into and out of the Borough.

Wirral Council would therefore ask that any visual impacts upon Areas of Special Landscape Value, as well as for views into and from the Borough are appropriately accounted for within the Environmental Statement.

Chapter 8: Traffic and movement

The Local Highways Authority (LHA) have been consulted.

The Council is satisfied in principle with the content of chapter 8 of this scoping report, with the applicant having included everything that the LHA would expect at this stage e.g. reference to the required TA/CMEP/RSAs/collision information that it will be provided to each LPA at full application stages for future detailed consultation purposes.

The proposed alignment of the pipe is predominantly through open field/farmland/greenbelt land (skirting around existing settlements) so one concern would have been reference to the PROW considerations. The applicant would appear to have included sufficient information at this stage within this document to address this, until such time that the application comes back for consultation.

The Council is concerned about the installation of apparatus within the adopted highway. No reference has been included covering 'legal agreements and relevant licences /permissions' If this pipeline is not to be deemed statutory undertakers equipment and is to remain a private asset a legal agreement and licence will be required for the permanent installation within the adopted highway network under the Highways Act 1980 and the New Roads & Street Works Act 1991.

Chapter 9: Noise and Vibration

Wirral Council's Environmental and Public Health departments have been consulted.

Wirral Council has had insufficient time to prepare a comprehensive consultation response on noise and vibration matters. As such the Council is unable at this point in time to fully respond on the Noise and Vibration impacts of the project upon the Borough. This should be regarded as a holding response on these matters and the Council therefore reserves the right to submit further comments at a later date.

Environmental Health do, however, note that 'Construction/operation/decommissioning of the proposed development of (AGI) may impact human health through temporary and permanent noise and vibration'. It is their understanding that this facility will be used to compress CO2 and is therefore likely to generate noise. The proposed locations are likely to be in close proximity to residential accommodation. A noise impact assessment would therefore be expected and consideration given to the impact of vibration arising from the facility/site.

Chapter 10: Historic Environment

MEAS and Wirral Council's Heritage Department have been consulted.

The approach set out with Chapter 10 of the scoping report is deemed as broadly appropriate. The proposed pipeline has the potential to impact a number of designated heritage assets during its construction. These have been highlighted in the initial scoping report as being in proximity to the proposed pipeline route. The report details listed buildings and conservation areas, however there is also potential for non-designated heritage assets to be affected by the proposals. with listed builds and conservation areas with Wirral having been highlighted on Figure 10.1.G.

Table 10.5 of the scoping report sets out that a Heritage Walkover Survey is to be undertaken, with site visits carried out to view relevant designated and non-designated assets and identify additional assets not recorded in existing datasets. The findings will inform the PEIR and Environmental Statement. This is welcomed, however, the Council advises that in line with NPPF paragraph 207, that the Environmental Statement to be submitted with the Development Consent Order must include individual assessments for each and every heritage asset (designated or otherwise). This includes the potential impact on their settings and views of the heritage assets. This is deemed a proportionate and reasonable request due to the considerable length of the pipeline and number of potential impacts along its route.

Account should be taken of archaeological significance of the area via specialist consultation, in addition to the potential impact on significant trees and woodland.

It is also noted that scoping has not included off route construction access roads and connections to local utilities. Wirral Council ask that these form part of the scoping for the Environmental Statement (ES), and their impact upon any heritage assets be assessed and included within the ES.

MEAS, who also advise Wirral Council on archaeological matters emphasise that they would expect to see archaeological heritage assets included within the PEIR, whether above or below-ground (Section 10.1.4). This could also include parkland, parish and township boundaries. The document proposes a 1km study area for this purpose to be based on the Draft Order Limits (once established) for the Proposed Development. Off-route access and temporary compounds are to be included (Section 10.3.7). The proposed Study Area is a reasonable and acceptable approach.

The Council are satisfied with the planned approach presented in Table 10-5 (Scope of Proposed Development Surveys) which comprises an Historic Environment Desk-based Assessment, Heritage Walkover Survey, AP/Lidar Survey, Geophysical Survey and the intrusive Trial Trench evaluation, which will contribute to determining the presence, potential for, and significance of any archaeological remains. However, there is some concern that Geoarchaeological Assessment has been omitted, and it is advised that this technique should be applied where warranted, for example in areas with potential for peat deposits, paleo-channels and alluvial deposits. The Council recommend the applicant consults Geoarchaeology: Using Earth Sciences to Understand the Archaeological Record (Historic England, December 2015) found here: <https://historicengland.org.uk/images-books/publications/geoarchaeology-earth-sciences-to-understand-archaeologicalrecord/> and also consults with the Historic England Science Advisor for the North West for further advice

Of significant concern is the proposed scope for the Trial Trenching which in its current format they find to be unacceptably limited. Whilst agreed that the trial trenching should target archaeological heritage assets as indicated by the DBA, other surveys, and from the Merseyside Historic Environment Record, to this the Council would add that Geophysical Survey is not 100% effective across all geological and site / ground conditions. Therefore, the Council would expect to see an evaluation outside of the positive results and in the areas of proposed ground disturbance. Furthermore, in this region undeveloped and historically undisturbed areas of green space are considered to have an as yet undefined archaeological potential. The Overarching National Policy Statement for Energy (EN-1) states "Where a site on which development is proposed includes, or the available evidence suggests it has the potential to include, heritage assets with an archaeological interest, the applicant should carry out appropriate desk-based assessment and, where such desk-based research is insufficient to properly assess the interest, a field evaluation." It should be acknowledged that trial trenching is just one type of intrusive archaeological evaluation and other techniques should be considered as appropriate.

The Council agree as stated in Section 10.6.3 that the construction of the Proposed Development has the potential to result in significant effects to non-designated heritage assets within the Scoping Boundary. This includes potential permanent impacts to buried archaeological remains. Further to the Scope and Methodology (Section 10.7) in this region MEAS expect all desk-based assessment and archaeological investigations to be informed by both volumes of the Historic Environment of NorthWest England: A Resource Assessment and Research Framework, 2007 and 2021 (<https://researchframeworks.org/nwrf/>) which identify what is important or significant archaeologically across the region. These could include objectives which relate to the archaeology of the Proposed Development site. The Receptor Sensitivity/Value is a standard approach and the Summary of issues to be scoped in / out (Tables 10-8 and 10-9) is agreed.

The Council have no archaeological concerns with the Environmental Impact Assessment – Scoping Report Volume 2 Appendices (January 2026, Document Reference: DOC-W05-014-Final).

Chapter 11: Water Environment and Flood Risk

There has been insufficient time for the Council to consult the Local Lead Flood Authority (LLFA). This should be regarded as a holding response on these matters and the Council therefore reserves the right to submit further comments at a later date.

Whilst the exact location of the Coastal AGI is currently unclear, with both 'Landfall' and 'Inland' zones having been identified as option, both areas sit within flood risk zones 2 and 3. The Coastal AGI will therefore likely be subject to flood risk. The Council would expect there to be a sequential test carried out in line with the NPPF, and that a site-specific flood-risk assessment be conducted. The Council would of course consult the LLFA on the information submitted as part the Environmental Statement or in support of the Development Consent Order application.

Chapter 12: Marine Environment

MEAS and Wirral's BNG Coordinator were consulted.

MEAS's comments are as follows:

Aquatic Baseline

Section 6.5 outlines an aquatic baseline. This is informed by a gap analysis of EA fish, invertebrate and macrophyte data (Appendix E). Table 6-8 includes several fish receptors and INNS fish/invertebrates. It is noted that the Birket including Arrowe Brook and Fender and Dibbinsdale Brook and Clatter Brook, are identified with gaps in recent fish data.

Depending on the extent of impact to freshwater and tidal habitats, the need for aquatic surveys including fish and INNS may be required. LERC data will also help supplement national EA data however there is typically a lack of aquatic biological records including structured data. Therefore, if impact is significant then survey would likely be required.

The LCR LNRS includes priorities for migratory fish and a short list of local priority species.

Chapter 12 states that no work is proposed beyond MLWS as consent for offshore elements are being sought separately. A marine licence for works up to MLWS will be sought. This is accepted and it is understood the applicant has met with MMO to discuss this matter.

The EIA report states that works in the intertidal zone are yet to be fully established but may comprise:

- The installation of the pipeline via trenchless techniques (e.g. via horizontal directional drilling);
- The installation of the pipeline via trenching;
- The installation of a cofferdam;
- The potential installation of near shore block valve, which could be on the seabed;
- dredging; and
- activities near flood defences.

As outlined above the intertidal area comprises national and international sites and HRA therefore applies. Section 12.2 outlines the marine study area which it states is specific to each receptor accounting for the mobility and impact pathways. As the marine zone is outside the scoping boundary and no works are proposed in that zone, this is accepted and should be fully defined at EclA stage.

A summary of marine data sources is set out comprising mainly national datasets. Access and permissions should be sought to existing local marine environmental baselines for existing and potential offshore and tidal projects in Liverpool Bay. Further, whilst more limited for marine, this should be supplemented by LERC data to inform the EclA.

The report states a full marine ecology baseline will be established for the PEIR and EclA. Planned surveys comprise habitat assessment and environmental baseline survey which comprises desktop review of geophysical seabed data, ground-truthing of habitats and video footage (drop down camera visuals at grab stations and areas of sensitive habitat). Sediment samples at every 1km along the pipeline route, vary sample locations, avoid sampling Annex I Habitats or sensitive habitats and sample along the centreline or either side of the route. The EBS should take additional samples / be varied where habitat change is noted along the pipeline route centreline.

It is unclear for passage and wintering birds, which WEBS years data sources have been assessed given that 5-year peak and mean data are necessary.

Section 12.2.19, benthic habitats and species – changes in water and sediment quality. Confirmation is required on assessment and data inputs for potential release of contaminants from sediment that may be disturbed from construction activities. For example, will this be based on sediment composition or will samples (cores or grabs) be taken for laboratory analysis?

With regard to Sections 12.4.16, 12.4.18 and 12.4.19 MEAS agree with scoping-in these topics. Changes from the scheme should be classified as indirect effects. Clarification is also sought on the scope of any hydro-environmental modelling to be undertaken as potential for hydrodynamic, sedimentary processes and physical process change is noted.

Scope of planned survey does not account for the need for botanical survey in the intertidal area. North Wirral Foreshore is a highly dynamic environment and pioneer dune and saltmarsh habitat is forming along this stretch of Coast. These are Annex I and qualifying SAC, SPA and Ramsar habitats and Phase 2 NVC survey should be required of the pipeline route through this area.

Primary fish or marine mammal surveys are not currently proposed but this will be reviewed as the project progresses. Further, details of sampling methods are not provided at this stage which is a limitation. Paragraph 12.2.23 confirms that initial meetings with NE, MMO, JNCC and the EA have been held in late 2025 and January 2026.

As scope of works in the intertidal zone is not yet confirmed it is not possible to accept survey effort or comment further at this time. However, once detail of works in the intertidal/supralittoral zone is fully understood, the Council would welcome the opportunity to discuss survey effort and techniques for benthic / biotope survey, sediment sampling techniques, marine mammals and fish with the applicant.

Evidence Plan approach

To ensure stakeholder/cross-organisational agreement on survey and assessment requirements the Council recommends the applicant prepares an evidence plan. This will help confirm scope and methods whilst ensuring the survey effort is proportionate and appropriate for the environmental baseline required for the DCO process.

At this time, the scope of Marine Net Gain (MNG) is not confirmed. However, given the links and interface with the marine zone and potential for MNG to be established during the timescales of this proposal; the Council recommend the applicant considers marine impact and the opportunity to provide a gain for the marine environment as best practice.

Chapter 13: Geology and Ground Conditions

There has been insufficient time for the Council to consult on this matter and we reserve the right to come back at a later date with further comment.

Chapter 14: Socio-Economics

There has been insufficient time for the Council to consult and to receive a response from our Economic Development Team. This should be regarded as a holding response on these matters and the Council reserves the right to come back at a later date with further comments. In line with policy WD 20 of Wirral's Local Plan, a project and development of this scale should demonstrate an increase in Social Value. Table 14-13 which sets out potential impacts and Table 14-18 which sets out the proposed

scope of the socio-economics assessment, both highlight the opportunity for employment, training, and apprenticeship opportunities for residents. We would like to this expanded on within Environmental Statement, with the inclusion of a social value statement setting out how social value will be secured and delivered in Wirral.

The Council also reserves the right to provide additional comments at a later date on the other potential impacts highlighted, such as loss of open space, availability of tourist accommodation, loss of community facilities, visitor attractions and businesses.

The potential temporary or permanent loss of development land is scoped in at the construction phase. The report Appendices (Figure 19.1G) makes reference to overlapping/nearby planning applications. Reference has been made to the outline application from Leverhulme (OUT/22/00946) that was refused. However, the Council is concerned, over how this pipeline proposal would impact more widely upon possible future applications for residential or other development and future statutory land use plans prepared either by the Liverpool City Region Combined Authority or Wirral Council. It is presumed a substantial initial safeguarding area and post-construction easement area will be a requirement which could have an impact upon site selection, layouts and possible housing numbers. To what extent and level of detail will this matter be explored within the Environmental Statement?

Chapter 15: Human Health

Wirral Council's Environmental and Public Health departments have been consulted. The approach set out with Chapter 15 of the scoping report is deemed as broadly appropriate, outlining the relevant statutory provisions, including Statutory Nuisance. There are, however, some areas that could be strengthened within the Environmental Statement (ES) to ensure human health impacts in Wirral are fully assessed. These include:

- Strengthen health baseline using Wirral JSNA data and inequalities mapping;
- Include assessment of vulnerable groups that may be impacted along the Wirral section;
- Provide more detail on the health effects of nuisance of construction e.g. dust;
- would benefit from modelling some of the health implications of CO₂ release / emergency scenarios but UKSHA may better guide on this;
- Construction phase could potentially result in disruption to active travel and green space which may have human impacts and would ask that these aspects be considered; and
- a proactive Wirral Community Engagement Plan to help develop the right mitigations for the risks specifically for populations in Wirral.

Chapter 16: Materials and Waste

MEAS were consulted.

The proposed methodology for assessing impacts to materials and waste seems reasonable. Mitigation will include outline CEMP and SWMP, also MMP if required to support the re-use of soils. This seems reasonable and the Council agree with the approach.

The Council recommend that the following information should be added/updated in this chapter:

- Waste Management Plan for England 2021 should be added to the relevant legislation/policy section;
- The following documents should be added to the bibliography section, Local Aggregate Assessments for each area, NW Aggregate Monitoring Reports and similar for Derbyshire/Staffordshire. Consideration should also be given to the relevant Waste Local Plan (and waste needs assessments) for each area;
- Table 16.5 Nationally and Regionally Available Construction Materials. It should be noted that while materials may be available in the NW, there is no crushed rock won in Wirral. There is also no landbank for sand and gravel within the Greater Manchester, Merseyside and Halton and Warrington LAA area, although marine won sand is landed in south Liverpool and river dredgings for aggregate use are landed in Bromborough;
- Table 16.7 Permitted Waste Sites – the landfill sites identified in Moreton are no longer operational; and
- For impacts on landfill capacity, does this need to be broken down into project areas, due to travel time and costs?

Chapter 17: Climate Change

MEAS and Wirral's Climate Emergency Team were consulted.

The Council consider the proposed approach and methodology for assessing impacts to climate change, climate change resilience and in-combination climate change impacts to be reasonable and follow best practice guidance.

The Council is however concerned as to whether it the approach to assessing the local climate impact is sufficient, particularly in the context of Wirral's Climate Emergency declaration and Climate Action Plan.

At present, the scope proposes assessing emissions only against UK wide carbon budgets and national Net Zero legislation, and Chapter 17 does not include any commitment to consider local carbon budget projections (such as Liverpool City Region) or Wirral's own climate targets. A locally aligned carbon budget assessment would allow the Council to understand the project's effect on the borough's decarbonisation pathway, not just the national position.

Similarly, Chapter 17 confirms that the Climate Change Resilience (CCR) assessment will rely on UKCP18 national climate projections, but it does not commit to incorporating local climate risk datasets, local hazard mapping, or the Council's local climate action/adaptation plans. While these datasets may appear in other EIA chapters, they should also inform the climate change assessment itself.

The scope also does not reference climate governance arrangements or any long-term monitoring framework, which are essential for ensuring accountability across the project's lifecycle.

Chapter 18: Major Accidents and Disasters

This chapter covers potential for the development to cause major accidents and the vulnerability of the development from major accidents and disasters. The proposed approach, receptors and methodology seem reasonable, but the Council will be guided by other technical specialists, such as the Health and Safety Executive (HSE).

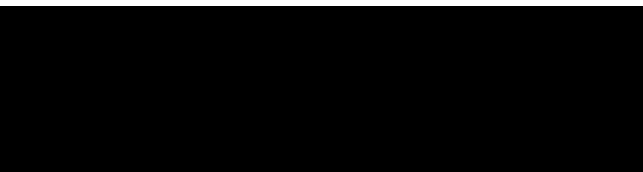
Chapter 19: Cumulative Effects

This chapter includes cumulative effects arising from the proposal covering both intra-project effects where a receptor is impacted by more than one effect from the same project and inter-project effects where several projects in-combination have an impact. The methodology and approach is reasonable. However, there is no discussion on what level of significance will be considered for including individual effects into the assessment for intra-project effects. It is advised that this be addressed at PEIR/Full EIA stage.

Appendix C includes a transboundary effects screening matrix. This defines a 15km Ecological Impact Assessment Study Area. The national and international sites within the Liverpool City Region are interconnected and their bird features interchange between sites. Therefore, impacts at North Wirral Foreshore may have much wider likely significant effects on wading bird populations of the Dee and Mersey estuaries, on the flight path of high tide roosts in Wirral or breeding birds linked to different estuaries or Liverpool Bay, for example.

Further, Liverpool Bay SPA is a transboundary marine site which spans from Anglesey in Northwest Wales up to South Cumbria. This coastal/marine corridor is an important highway for migratory birds along North Wirral Foreshore and north following Sefton Coast. The proposed stacks disrupt this strategically important highway and may also impact local migratory routes as outline above.

Such transboundary effects should be considered in terms of the projects impact alone and in-combination with other significant and local (approved and future) projects within the study area. Appendix I includes a list of NSIPs such as Mersey Tidal Power and Hynet as well as local projects in Wirral. However, this is only up to 2024 and appears to identify only projects in the immediate vicinity of the scoping boundary. This should be updated with new projects within the Ecological Impact Assessment Study Area to inform the HRA and EclA process.



Assistant Director Chief Planner
(Regeneration & Place)



[REDACTED]
Environmental Services
Infrastructure Decisions and
Applications Service
Planning Inspectorate
c/o QUADIENT
69 Buckingham Avenue
Slough, SL1 4PN

16 January 2026

Dear [REDACTED],

**Planning Act 2008 (as amended) and The Infrastructure Planning
(Environmental Impact Assessment) Regulations 2017 (The EIA
Regulations) – Regulations 10 and 11**

**Application by Peak Cluster Limited (the applicant) for an Order granting
Development Consent for the Peak Cluster CCS Pipeline (the proposed
development)**

**Scoping consultation and notification of the applicant's contact details and
duty to make available information to the applicant if requested**

Further to your letter dated 13 January 2026 regarding the above project, I can conform that due to the distance between the County of Worcestershire and the proposed project, Worcestershire County Council wish to make no comments.

The County Council acknowledges the duty under Regulation 11(3) of The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017.

Yours sincerely

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