Cheshire

People taking action for wildlife

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FAO HyNet North West Project Team
Liverpool Bay CCS Ltd

21 March 2022

To whom it may concern,

Re: HyNet North West Carbon Dioxide Pipeline – Preferred Route Consultation

The Cheshire Wildlife Trust (CWT) is the leading conservation charity in the Cheshire area, focussing on all aspects of wildlife. In our response to the second consultation for the HyNet North West Carbon Dioxide Pipeline Preferred Route we seek to represent the views of our 17,000+ local members, particularly those who live in Cheshire West and Chester (CWaC) and on the Wirral.

General Comments

Biodiversity Net Gain (BNG)

We welcome the commitment from the applicant that the DEFRA 3.0 metric will be used to complete a BNG assessment for the project and advise that a minimum 10% net-gain is targeted in light of the 'green' nature of the project and the fact that both climate and biodiversity are intrinsically linked. We advise the CIEEM Biodiversity Net Gain Report and Audit Templates[1] are utilised to ensure the assessment is undertaken appropriately, presented clearly and demonstrates that all 10 of the Good Practice Principles of Biodiversity Net Gain[2] have been followed.

PEIR – Chapter 10 Greenhouse Gas – Response to the Scoping Opinion

We previously expressed our disappointment that that greenhouse gas (GHG) emissions associated with land use change throughout the construction of the project had been scoped out of further assessment in the EIA Scoping Report. However, following review, PINS did not agree that GHG emissions arising from the disposal of biomass nor that GHG emissions arising from the reduction in carbon sequestration could be scoped out of the EIA. In response the applicant has noted this PINS comment but also stated that that they do not anticipate the emissions arising from the disposal of biomass and from the reduction in carbon sequestration will be large as the "Carbon Dioxide Pipeline is not expected to intersect any large areas of woodland"[3]. The disturbance of deep peats at Frodsham, Helsby and Ince Marshes and at Gowy Meadows in order to facilitate the construction and operation of this scheme will result in significant GHG emissions. These are both areas of significant natural capital value that store large amounts of carbon and we strongly advise these areas are targeted specifically (in addition to areas of woodland and

[1] https://cieem.net/resource/biodiversity-net-gain-report-and-audit-templates/
[2] CIRIA (2019) Biodiversity Net Gain. Good Practice Principle for Development. A Practical Guide. CIRIA C776a. https://cieem.net/resource/biodiversity-net-gain-good-practice-principles-for-development-a-practical-guide/
[3] PEIR Vol 2. Chapter 10 – Greenhouse Gas. Table 10-1 Summary of the EIA Springing Opinion in Relation to GHG

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saltmarsh) when assessing emissions arising from the disposal of biomass and the reduction in carbon sequestration. We recommend that the applicant seeks the advice of a peatland emissions expert on this matter (e.g. a representative from a local academic institution, Natural England, the Centre for Ecology and Hydrology or a local Wildlife Trust etc.) rather than a representative from the Local Enterprise Partnership (LEP) as suggested in the PEIR.

Deep peats are carbon rich and complex hydrological bodies. To prevent peat oxidisation, and the increased GHG emissions this results in, peatlands must be kept wet. Open trenching and backfilling will expose and oxidise bare peat during the construction stage resulting in an increase in emissions. This also creates a disturbed weakened area for water to move below the surface. Adding to this effect, buried services such as pipelines that run beneath or through a peat body also act as a conduit for groundwater, allowing water to flow easily along the route of the pipeline. Ongoing work by Lancashire Wildlife Trust has found that the resultant effect of this is localised lowering of the water table in the 15 m either side of the pipeline. This localised water table lowering also results in increased peat oxidisation and increased GHG emissions. Therefore, we expect that the proposed combination of trenching and laying pipelines through deep peat deposits, although considered to be temporary in the EIA scoping report and PEIR, is highly likely to result in a significant residual increase in GHG emissions in the absence of mitigation.

Given the purpose of the HyNet project is to contribute to achieving net-zero, we strongly advise that the potential for a significant residual increase in peatland GHG emissions as a result of the scheme is assessed within the EIA.

Currently Known Ecological Features within the Preferred Route Corridor

We are disappointed to see that in general the issues raised in our previous comments do not appear to have been taken into consideration during the preferred route corridor (PRC) selection process. We therefore reiterate that any development proposals associated with the HyNet North West Carbon Dioxide Pipeline should ensure the following important ecological features are avoided throughout the entirety of the Preferred Route Corridor:

- Statutory designated sites for nature conservation;
- Non-statutory designated sites for nature conservation (including non-designated assets such as potential Local Wildlife Sites);
- Irreplaceable habitats and peatlands;
- Priority and notable habitats, and;
- Ecological networks and wildlife corridor statutory and non-statutory designated sites for nature

Any development adjacent these features should incorporate substantial mitigation to lessen impacts to biodiversity while seeking to enhance overall condition and achieve measurable net-gains for biodiversity. This can be achieved by prioritising a scheme design that avoids important ecological features for biodiversity, while also improving the permeability and function of the development site for wildlife by creating new resources within, and creating new connections to the wider landscape.

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We are disappointed that our previous alternative route proposals have has not been investigated further as they would minimise impacts on important ecological features.

Section 1

We object to Section 1 of the PRC in its current layout as there are at least five important ecological features located within the red line boundary of which some will be unavoidable.

Table 1. Ecological features located within Section 1 of the PRC

Site Name	Ecological Feature	Location
Frodsham, Helsby and Ince Marshes	CWaC LWS	Unavoidable within Section 1
Frodsham, Helsby and Ince Marshes	Peatland	Unavoidable within Section 1
Coastal Floodplain and Grazing Marsh (CFGM)	Priority Habitat	Unavoidable within Section 1
Watercourses, ditches and ponds	Priority Habitat	Potentially avoidable within Section 1
Deciduous woodland	Priority Habitat	Potentially avoidable within Section 1

As previously stated, our preferred route corridor for the connection from Stanlow to Ince would not impact on the Frodsham, Helsby and Ince Marshes LWS or the CFGM and deep peat reserves associated with this site. Instead it would be possible to follow the existing access road from the Stanlow Site at Oil Sites Road to the Protos site, thereby only impacting the tarmac sealed surface of negligible ecological value.

Section 2

We object to Section 2 of the PRC in its current layout as there are at least seven important ecological features located within the red line boundary of which some will be unavoidable.

Table 2. Ecological features located within Section 2 of the PRC

Site Name	Ecological Feature	Location
Gowy Meadows	CWaC LWS	Unavoidable within Section 2
Gowy Meadows	Peatland	Unavoidable within Section 2
Coastal Floodplain and Grazing Marsh (CFGM)	Priority Habitat	Unavoidable within Section 2
Collinge Wood and Meadow	CWaC LWS	Potentially avoidable within Section 2
Shropshire Union Canal (main line)	CWaC LWS	Potentially avoidable (with HDD) within Section 2
Watercourses, ditches and ponds	Priority Habitat	Potentially avoidable within Section 2
Deciduous woodland	Priority Habitat	Potentially avoidable within Section 2

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As previously stated, our preferred route for this section would not impact on the Gowy Meadows and Ditches LWS or the CFGM or deep peats associated with this site. Our preferred route for this section would avoid Gowy Meadows by passing south of the LWS via Gowy Landfill, to the North of (and avoiding impacts to) Gowy Woodland Park. This option would minimise impacts on the priority habitats associated with Gowy Meadows and Ditches LWS.

On the assumption that impacts to the Shropshire Union Canal (main line) LWS can be avoided via HDD or alternative construction techniques, we would prefer the South alternative route is progressed as this route appears to cross fewer minor watercourses and avoids two parcels of woodland in the area.

Section 3

We object to Section 3 of the PRC in its current layout as there are at least seven important ecological features located within the red line boundary of which some will be unavoidable.

Table 3. Ecological features located within Section 3 of the PRC

Site Name	Ecological Feature	Location
Lea by Backford Railway Cutting	CWaC LWS	Potentially avoidable via Southern route selection
Viaduct Wood	CWaC LWS	Potentially avoidable within Section 3
Wood West of Crabwell Manor	CWaC LWS	Potentially avoidable within Section 3
Saughall Bank	CWaC LWS	Unavoidable within Section 3
Lowland meadow	Priority Habitat	Potentially avoidable within Section 3
Watercourses, ditches and ponds	Priority Habitat	Potentially avoidable within Section 3
Deciduous woodland	Priority Habitat	Potentially avoidable within Section 3

On the assumption that there would be a sufficient buffer to the Viaduct Wood LWS, we would prefer the South alternative route is progressed as this route would avoid direct impacts to the Lea by Backford Railway Cutting LWS.

Section 4

On the assumption that impacts to the River Dee SAC and SSSI can be avoided via HDD or alternative construction techniques, we have the following comment on Section 4 of the PRC in its current layout.

Table 4. Ecological features located within Section 4 of the PRC

Site Name	Ecological Feature	Location
River Dee and Bala Lake / Afon Dyfrdwy a Llyn Tegid	SAC/SSSI	Potentially avoidable via trenchless crossing

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Although we do not object to the PRC in Section 4 on the provision that impacts to the internationally designated site can be avoided, we advise that the proposed centralised compound in this section is sited away from the River Dee to avoid additional pressures on the SAC/SSSI and its designated features.

Section 5

We strongly object to Section 5 of the PRC in its current layout as there are at least seven important ecological features located within the red line boundary of which some will be unavoidable.

Table 5. Ecological features located within Section 5 of the PRC

Site Name	Ecological Feature	Location
Sea View Wetland	LWS (Wales)	Potentially avoidable via Elowe South selection
Aston View Wetland	LWS (Wales)	Potentially avoidable via Elowe South selection
Peatlands associated with Sea View and Aston Wetlands	Peatland	Potentially avoidable via Elowe South selection
Connah's Quay Ponds and Woodland	SSSI	Immediately adjacent Section 5
Brook Park Farm Wood	LWS (Wales)	Unavoidable within Section 5
Ancient Semi Natural Woodland (id 35855)	AWI 2021 (Wales)	Unavoidable within Section 5
Restored Ancient Woodland (id 37348)	AWI 2021 (Wales)	Potentially avoidable within Section 5

We strongly object to the selection of this route section and advise the detailed route is redesigned. If this section is progressed regardless, we would prefer the Elowe South alternative route is progressed as this route would avoid direct impacts to the Sea View and Aston View Wetland LWS's and associated peat deposits. We would also prefer the Altami Brook South alternative route is progressed as this route would minimise impacts to the Brook Park Farm LWS.

Section 6

On the assumption that impacts to the Leadbrook Wood LWS and restored ancient woodland can be avoided (including a suitable buffer of at least 15 m) we do not have any comments on Section 6 of the PRC in its current layout.

Table 6. Ecological features located within Section 6 of the PRC

Site Name	Ecological Feature	Location
Leadbrook Wood	LWS (Wales)	Potentially avoidable within Section 6
Leadbrook Wood Restored Ancient Woodland (id 31213)	AWI 2021 (Wales)	Potentially avoidable within Section 6

Section 7

Patron Richard Walker
President Felicity Goodey CBE DL **Chairman** Bill Stothart
Chief Executive Charlotte Harris

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We do not have any comments to make on Section 7 of the PRC in its current layout.

We trust you will find these comments helpful.

Yours sincerely,

Ross Harding
[redacted]