

Peak Cluster CCS Pipeline

Application Reference Number: EN0710001



Applicant: Peak Cluster Ltd

Submission September 2027

Written with reference to:

The Planning Act 2008. *Planning Act 2008, c.29.*

The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 – Regulations 5(2)(q).

QUALITY INFORMATION:

Prepared By	Checked By	Verified By	Approved By
EL/CT/JD	CT	JD	CT

REVISION HISTORY

Revision	Revision Date	Details	Authorised	Name	Position
00	2025	PINS Issue	Y	Chris Taylor	Head of Planning and Consents
01	January 2026	Public Issue	Y	Chris Taylor	Head of Planning and Consents

LIST OF OUTSTANDING ISSUES AND INFORMATION (Reference against Issues Tracker*)

This table will be updated as we move through phases of consultation and project development, e.g. Design Envelope Freezes.			

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1.0 Project Overview

1.1 Name and Description

Peak Cluster is an innovative project aimed at capturing CO₂ emissions from cement and lime production in Derbyshire and Staffordshire. The captured CO₂ will be transported via a buried pipeline to a coastal location on the Wirral peninsula, from where it will be permanently stored under the seabed by Morecambe Net Zero (MNZ). MNZ, which secured its storage licence from the North Sea Transition Authority (NSTA) in 2023, is now working towards its storage permit and will store the CO₂ captured by Peak Cluster.

Peak Cluster will include a new underground CO₂ pipeline, capture facilities at cement and lime plants in Derbyshire and Staffordshire, and a connection to the MNZ CO₂ storage site. The project aims to capture over 3 million tonnes of CO₂ per year.

MNZ | Peak Cluster represents the full chain collaboration between MNZ and Peak Cluster, including the Capture Facilities.

The Peak Cluster CCS Pipeline, a nationally significant infrastructure project as defined in sections 14 and 21 of the Planning Act 2008 for which a Development Consent Order (DCO) is sought, anticipated to comprise works including:

- Peak Cluster Pipeline
- Breedon Capture Facility
- Tarmac Capture Facility
- Buxton Lime Capture Facility
- Holcim Capture Facility
- Above Ground Installations (AGIs)
- Block Valve Stations (BVS)

- Coastal AGI
- Compressor Stations and Compressor Compounds
- Coastal AGI to Mean Low Water Spring (MLWS) pipeline
- Works required for construction and operation including, but not limited to, construction compounds, temporary construction accesses, permanent accesses and environmental mitigation including BNG
- Other ancillary work

Peak Cluster is a carbon dioxide transport pipeline network connecting carbon capture sites in Derbyshire and Staffordshire to a coastal location on the Wirral peninsula.

1.2 Background

Peak Cluster originated from a group of operational sites working in collaboration to develop the necessary infrastructure to achieve zero-carbon emissions. It includes four industrial manufacturers of cement and lime in Derbyshire and Staffordshire, managed by Progressive Energy. Each capture facility's design is being developed by the respective Peak Cluster partner (Tarmac Limited, Breedon Cement Limited, Holcim UK, and Buxton Lime), tailored to the specific requirements, operating conditions, space, and utilities available at each site. Consequently, different capture technologies and design choices will be made to optimise each facility. The flexibility needed for the optimal final design will vary by site and will be detailed in the DCO application. The design work for the project is ongoing, using a Rochdale Envelope approach as per PINS Advice Note 9.

1.3 Applicant and Key Contacts

For the Peak Cluster CCS Pipeline, the Applicant: **Peak Cluster Limited**. A joint venture special purpose company to promote the delivery of Peak Cluster.

Project Director: Mr Rob Gully
Land and Consents Director: Dr Chris Taylor
DCO Lead: Dr Jim Doyle

1.4 Anticipated DCO Submission Date

The applicant intends to submit its DCO application in September 2027

1.5 Purpose of this Document

In May 2024, the Government released its Nationally Significant Infrastructure Project: 2024 Pre-application Prospectus, introducing a new pre-application service tailored for Nationally Significant Infrastructure Projects (NSIPs), including the Proposed Development. This service is underpinned by updated guidance available on the 2024 National Infrastructure Planning Guidance Portal.

The Prospectus outlines three tiers of pre-application service offered by the Planning Inspectorate (PINS), each providing a different level of support to applicants prior to submitting an NSIP application:

- Basic
- Standard
- Enhanced

Peak Cluster will follow the **Standard** pre-application service tier, as confirmed by PINS by email on 22 October 2024.

According to Paragraph 009 (Reference ID 02-009-20240430) of the Planning Act 2008: Pre-application stage for Nationally Significant Infrastructure Projects guidance, the pre-application process for NSIPs is led by the applicant. To support a robust and effective process—particularly in terms of engagement and the

quality of the application—applicants are encouraged to prepare a Programme Document at the outset of the pre-application stage for submission to the PINS.

This document is intended to help all participants in the pre-application process, especially statutory consultees, understand the proposed timeline and ensure their input is scheduled at the most appropriate stages. It also serves as a key project management tool for the applicant, supporting the timely preparation and submission of application documents for PINS' consideration at the acceptance stage.

As such, this Programme Document will be maintained by Peak Cluster Ltd. (Applicant) throughout the pre-application period, and a public-facing version will be made available on the Peak Cluster website.

Peak Cluster Ltd. will proactively update PINS on any changes to the Programme Document, highlighting the completion of key milestones and demonstrating ongoing progress in preparing the application and will include the following;

- The intended date of application submission.
- A detailed timetable outlining the pre-application process, including key events, milestones, and a target completion timeframe
- Peak Cluster Ltd. view of the principal issues to be addressed, and the actions planned to resolve them.
- Proposals for engagement with statutory consultees and local authorities, including any planned financial support mechanisms such as Planning Performance Agreements (PPAs).
- Identification of risks that could affect the pre-application process, along with the approach to tracking and managing those risks.
- Cross-references to the Statement of Community Consultation (SoCC), as required under Section 47 of the Planning Act 2008.

2.0 Key Milestones

2.1 Key Milestones leading to Application Submission

Milestone	Date
EIA Scoping Report Submitted	12 th January 26
EIA Scoping Opinion Received	23 rd February 26
Non-Statutory Consultation (Phase 1)	12 th January 26 – 27 th February 26
Anticipated Statement of Community Consultation Period (minimum 28 days)	September 26 – October 26
Statement of Community Consultation Published	November 26
Statutory Consultation Period (Phase 2)	November 26 – February 27
Preparation of Statements of Common Ground	On-going
Adequacy of Consultation Milestone	June 2027
Application Submitted	September 2027

3.0 Pre-application Issues and Potential Risks

This section sets out the main issues identified by the Applicant during the pre-application stage, including the activities that will be undertaken to address those issues. It also identifies potential risks during the pre-application stage.

The main issues that will be identified in the pre-application process are set out in Table 3.1 below.

Table 3.1: Main Issues Identified by the Applicant

Topic	Description of Issue	Management of Issue
Design	Length of the pipeline / complexity of engineering design in the specific areas?	<i>The Scheme will undergo several design stages informed by surveys, consultations, and stakeholder input. Site selection aims to minimise impacts on both the environment and the community....</i>
Pipeline route through Lime Park/ Harehill	National Trust (NT) estates and properties, impact on management and access for public and staff	Ongoing liaison with NT over both properties

Interface with other utility projects	Proposed pipeline Scoping boundary runs close to other utilities projects or existing infrastructure	Ongoing Liaison with specific utilities to ensure collaborative approach and mutual understanding of each other's projects.
Topic	Description of Issue	Management of Issue
Update to key legislation	Planning and Infrastructure Act, 2025.	Act will change the statutory requirements for various elements around consultation, awaiting advice note to be published.

4.0 Engagement Plan

This section outlines Peak Cluster Ltd. approach to pre-application consultation, including planned engagement with statutory consultees and local authorities. As the project progresses, the engagement plan will be cross-referenced to the Statement of Community Consultation (SoCC).

Peak Cluster Ltd. is also continuing broader engagement with stakeholders, landowners, and local communities.

Each group has distinct interests in the Proposed Development and may prefer different methods of engagement. The following sections identify these groups and describe how Peak Cluster Ltd. intends to engage with each.

Table 4.1: Summary of Stakeholder Groups Targeted for Pre-application Engagement

Stakeholder Group	Name	Method of Consultation
Statutory Bodies	Environment Agency	Direct engagement. Written briefings
	Natural England	On-line and in-person briefings
	Historic England	On-line and in-person briefings
	Cheshire Brine Subsidence Compensation Board	Technical meetings and written correspondence
	University of Manchester (Jodrell Bank Observatory)	Statement of Common Ground
	Peak District National Park Authority	Online and in-person consultation events
	Network Rail	Project newsletter
	National Highways	Project website
	National Grid	Project website
Host Authorities	High Peak Borough Council	Direct engagement
	Derbyshire Dales Council	Written briefings
	Staffordshire Moorlands Council	On-line and in-person briefings
	Cheshire East Council	Technical meetings and written correspondence
	Cheshire West and Chester	

Council	Statement of Common
Wirral Council	Ground
Derbyshire County Council	Online and in-person
Staffordshire County Council	consultation events
East Midlands Combined Authority	
Liverpool City Region Combined Authority	

Neighbouring Authorities	Halton Borough Council	Direct engagement (where necessary)
	Warrington Borough Council	Written briefings
	Stoke-on-Trent City Council	
	Shropshire Council	Technical meetings and written correspondence
	Amber Valley Borough Council	Statements of Common Ground (where necessary)
	Northeast Derbyshire District Council	On-line and in-person consultation events
	South Derbyshire District Council	Project newsletter
	East Staffordshire Borough Council	Project website
	Newcastle-under-Lyme Borough Council	
	Stafford Borough Council	
	Manchester City Council	
	Oldham Council	
	Stockport Council	
	Tameside Metropolitan Borough Council	
	Trafford Council	

	Kirklees Council Barnsley Council Sheffield City Council Flintshire County Council Wrexham County Borough Council Greater Manchester Combined Authority	
Technical Engagement	Statutory Undertakers /Asset Owners	Direct engagement Written briefings Online and in-person briefings Technical meetings and written correspondence Statements of Common Ground / Protective Provisions where appropriate
Landowners	Landowners, occupiers and those with interest in land in accordance with Section 42 and 44 of the Planning Act 2008.	Direct engagement in person and via land agents Specific engagement and meetings, where required, including with specialisms such as EIA and engineering. Continued engagement through written and project briefings. Project Newsletters and Project Website. Negotiation of Licence Agreements, Heads of Terms and Voluntary Agreements or simply Negotiation of Voluntary Agreements Statements of Common Ground

		Online and in-person consultation events
Community		
	Parish Councils	Direct engagement
	Environment and Community Groups	Written briefings
	Health and Social Care Providers	Online and in-person briefings
	Youth and Elderly Groups	Statement of Common Ground / Protective
	Transport User Groups	Provisions where appropriate
	Local Businesses and Economic Development Organisations (e.g. Chambers of Commerce)	Project newsletter
	Local Voluntary and Charitable Sector Organisations	Project website
	Schools, Colleges and Universities	
	Residents' Associations	
Other		
	Parties making themselves known at consultation events and identified within the consultation zones, parties whom operators have had regular interface with.	Written briefings Online and in-person briefings where appropriate Online and in-person consultation events Project newsletter Project website

Peak Cluster Ltd. has started engagement with host authorities regarding Planning Performance Agreements (PPAs). These agreements should help to provide the necessary resource and support, enabling engagement regarding the Proposed Development. Cost recovery agreements are in place with the Environment Agency and Natural England and under discussion with Historic England. Further agreements will be sought with other consultees where this is believed necessary.

Peak Cluster Ltd. will undertake Statutory Consultation and publish a SoCC, as required under Section 47 of the Planning Act 2008. Before publishing the SoCC, Peak Cluster Ltd. will consult with host authorities on the draft version for a period of 28 days.

4.1 Adequacy of Consultation Milestone

The adequacy of consultation milestone ('AoCM') provides the Applicant with an opportunity to outline the stages of consultation that have taken place to date and demonstrate compliance with the Statement of Community Consultation ('SoCC') and the Programme Document, as well as summarise the consultation responses and the way in which these responses are shaping the DCO application, to the Planning Inspectorate.

On 30th April 2024, the Department for Levelling Up, Housing and Communities (now Ministry of Housing, Communities and Local Government) issued guidance titled 'Planning Act 2008: Pre-application stage for Nationally Significant Infrastructure Projects' (the Guidance) which describes the AoCM as "*a short statement of the elements of consultation which have been carried out compared with the components set out in the Programme Document and the SoCC*". Intended to be submitted no later than around three months before submission of the DCO application, the AoCM is also described within the Guidance as an "informal but nonetheless important opportunity to check that the pre-application programme is on track, and if it is seriously adrift the Planning Inspectorate will advise the applicant about the steps necessary to enable the application to be submitted having fulfilled the statutory requirements".

The Applicant intends to submit an Adequacy of Consultation Milestone Report for Peak Cluster to the Planning Inspectorate in June 2027 pursuant to the Guidance.

5.0 Document Submission Timeline

Table 5.1: Document Submission Timeline (Including Meetings with PINS for updates at opportune times in delivery)

Meeting Dates	Documents	Key areas for discussion	Deadline for submission of documents
12 th March 2026	Updated Programme Description/ Issues Tracker inputs and outputs from consultation	Feedback on Phase 1 consultation, review of key and new issues following consultation	By end of February, 2026 for PINS to review.
Quarter 2 Meeting (date to be agreed)	Updated Programme Description /Issues Tracker	Update on Design Envelope Freeze 2; changes made to Scoping Boundary following consultation and possible changes in approach following advice regarding Planning and Infrastructure Act, 2025.	2 weeks before meeting date for PINS to review
Quarter 3 (date to be agreed)	Updated Programme Description /Issues Tracker	Update on survey progress and interface with Statutory	2 weeks before meeting date for PINS to review

		consultees and stakeholders	
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Dependencies and Risks

In line with Planning Inspectorate guidance, identifying and managing dependency and risk factors early in the pre-application stage supports a resilient and well-coordinated application process. The following sections outline key dependencies and associated risks that may influence the delivery of the Development Consent Order (DCO) programme.

6.1 External Dependencies

Peak Cluster Ltd. will adopt the Issues Tracker provided by PINS.

The issues tracker will be reviewed and updated periodically.

6.2 Risk Mitigation Strategies

A Risk Manager has been appointed to lead the identification, recording, tracking, and resolution of risks and opportunities associated with the project. The approach focuses on capturing the core nature of each risk or opportunity and its potential impacts, enabling targeted and effective mitigation strategies.

As the project progresses, the Programme Document will be appended with a Risk Register. This will detail the risk mitigation strategy and monitor outcomes, ensuring that risks are actively managed and opportunities are progressed in line with project objectives.

6.0 Monitoring and Updates

To ensure transparency and alignment with Planning Inspectorate expectations, this Programme Document will be subject to regular monitoring and updates, with revised versions shared with PINS and made publicly available via the project website as the DCO process progresses.

7.1 How the Programme will be Reviewed and Updated

The programme will be reviewed and updated with revisions published as required throughout the pre-application stage.

7.2 Contact Point for Updates

Key contact address for Peak Cluster: consultation@peakcluster.co.uk