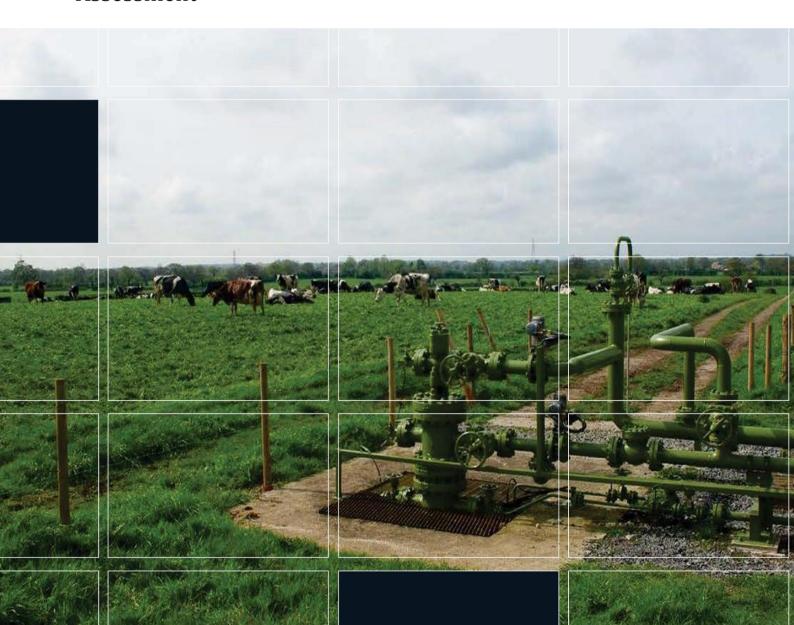


Keuper Gas Storage Project

Preliminary Environmental Information Report – Cumulative Effects Assessment Cumulative Effects Assessment PREPARED FOR Keuper Gas Storage Limited

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ACRONYMS AND ABBREVIATIONS

Acronym	Description
CEA	Cumulative Effects Assessment
DCO	Development Consent Order
EIA	Environmental Impact Assessment
ERM	Environmental Resources Management



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Acronym	Description
ES	Environmental Statement
KGSL	Keuper Gas Storage Limited
KGSP	Keuper Gas Storage Project
МС	Material Change
PEIR	Preliminary Environmental Information Report

CUMULATIVE FFFECTS ASSESSMENT

18.1 INTRODUCTION

- 18.1.1.1 This chapter of the Preliminary Environmental Information Report (PEIR) assesses the potential cumulative effects of the construction and operation and maintenance of the Proposed Development. Decommissioning is not considered in this Cumulative Effects Assessment (CEA) on the basis that it is not possible to anticipate other developments that could be concurrent with such activities, as a result of the amount of time that will pass before decommissioning activities will commence.
- 18.1.1.2 The chapter also provides the policy context for cumulative effects, consultation feedback of the Proposed Development, the assessment methodology and criteria used in the assessment, and the results of the assessment for each relevant environmental topic.
- 18.1.1.3 Cumulative effects are defined as those in which the impacts (beneficial or adverse, direct and indirect, long-term and short-term) arise from a range of activities throughout an area or region, where each individual effect may not be significant if taken in isolation. Developments that are reasonably foreseeable and/or consented, and in proximity to the Proposed Development, may lead to cumulative effects on the same receptor.¹

18.2 LEGISLATION, POLICY AND GUIDANCE

18.2.1 LEGISLATION

The Town and Country Planning Environmental Impact Assessment (EIA) Regulations 2017²

18.2.1.2 Schedule 4, paragraph 5 states "a description of the likely significant effects of the development on the environment resulting from...(e) the cumulation of effects with other existing and/or approved projects, taking into account any existing environmental problems relating to areas of particular environmental importance likely to be affected or the use of natural resources"

² UK Government. (2017). The Town and Country Planning Environmental Impact Assessment (EIA) Regulations. (Online). Available at: <u>The Town and Country Planning (Environmental Impact Assessment)</u> Regulations 2017



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¹ UK Government. (2024). Nationally Significant Infrastructure Projects: Advice on Cumulative Effects Assessment. (Online). Available at:

https://www.gov.uk/guidance/nationally-significant-infrastructure-projects-advice-on-cumulative-effects-assessment

18.2.2 NATIONAL POLICY

The Overarching National Policy Statement (NPS) for Energy (EN-1) (2024)³

18.2.2.2 NPS EN-1 sets out national policy for delivery of major energy infrastructure in the UK, published in 2023 and later updated in 2024. The specific policies within NPS EN-1 relating to cumulative effects are detailed below in **Table 18.1**.

³ UK Government. (2024). The Overarching National Policy Statement for Energy. (Online). Available at: Overarching National Policy Statement for energy (EN-1) - GOV.UK



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TABLE 18.1 - NPS EN-1 POLICIES RELATING TO CUMULATIVE EFFECTS AND THEIR CONSIDERATION WITHIN THE CHAPTER

Requirement of NPS EN-1	Consideration within Chapter
Paragraph 3.3.77: "development consent applications should include details of how connected infrastructure will be consented, how cumulative impacts will be assessed and whether any necessary consent, permits and licenses have been obtained."	The methodology and approach of how the assessment of Cumulative effects will be undertaken in the ES have been set out in this chapter.
Paragraph 4.1.5: "In considering any proposed development, in particular when weighing its adverse impacts against its benefits, the Secretary of State should take into accountits potential adverse impacts, including on the environment, and including any longterm and cumulative adverse impacts, as well as any measures to avoid, reduce, mitigate or compensate for any adverse impacts, following mitigation hierarchy."	Chapters 6-17 of this PEIR have taken into account the potential adverse impacts of the Proposed Development and any cumulative adverse impacts will be assessed in the ES. Measures to avoid, reduce, mitigate or compensate for any adverse impacts, following mitigation hierarchy will be presented in the ES.
Paragraph 4.2.12: "Applicants should set out how residual impacts will be compensated for as far as possible. Applicants should also set out how any mitigation or compensation measures will be monitored and reporting agreed to ensure success and that action is taken. Changes to measures may be needed e.g. adaptive management. The cumulative impacts of multiple developments with residual impacts should also be considered."	The cumulative impacts of multiple developments with residual impacts have been considered and a long list have been identified in this chapter. The monitoring and reporting of mitigation and / or compensation measures will be discussed in the ES.



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Requirement of NPS EN-1	Consideration within Chapter
Paragraph 4.3.3: "The Regulations require an assessment of the likely significant effects of the proposed project on the environment, covering the direct effects and any indirect, secondary, cumulative, transboundary, short, medium, and long-term, permanent and temporary, positive and negative effects at all stages of the project, and also of the measures envisaged for avoiding or mitigating significant adverse effects."	Chapters 6-17 of this PEIR have taken into account the likely significant effects of the Proposed Development at all stages. Any cumulative effects will be assessed in the ES. Measures to avoid, reduce, mitigate or compensate for any adverse impacts, following mitigation hierarchy will be presented in the ES.
Paragraph 4.4.6: "The impacts of more than one development may affect people simultaneously, so the applicant should consider the cumulative impact on health in the ES where appropriate."	Chapter 14, Population and Human Health assesses the impact of the Proposed Development on human health. The cumulative impact of the Proposed Development on health will be considered in the ES.
Paragraph 4.11.7: "The Planning Act 2008 aims to create a holistic planning regime so that the cumulative effect of different elements of the same project can be considered together."	Cumulative effects have been assessed in the chapter.
Paragraph 4.12.15: "Working in close cooperation with the EA or NRW and/or the pollution control authority and other relevant bodies, such as the MMO, the SNCP, Drainage Boards, and water and sewerage undertakers, the Secretary of State should be satisfied, before consenting any potentially polluting developments, that:the effects of existing sources of pollution in and around the site are not such that the cumulative effects of pollution when the proposed development is added would make that development unacceptable,	Chapter 7 Hydrology and Flood Risk assesses the impact of the Proposed Development on pollution in and around the site. The cumulative impact of the Proposed Development on pollution in conjunction with other relevant proposed developments will be considered in the ES.



Requirement of NPS EN-1	Consideration within Chapter
particularly in relation to statutory environmental quality limits."	
Paragraph 5.8.15: "The minimum requirements for Flood Risk Assessments (FRA) are that they shouldconsider and quantify the different types of flooding (whether from natural and human sources and including joint and cumulative effects) and include information on flood likelihood, speed-of-onset, depth, velocity, hazard and duration."	This will be addressed in the Flood Risk Assessment (FRA) which will accompany the ES as a Technical Appendix.
Paragraph 5.8.32: "Where development may contribute to a cumulative increase in flood risk elsewhere, the provision of multifunctional sustainable drainage systems, natural flood management and green infrastructure can also make a valuable contribution to mitigating this risk whilst providing wider benefits."	This will be addressed within the FRA, which will accompany the ES as a Technical Appendix.
Paragraph 5.9.9: "The applicant should undertake an assessment of any likely significant heritage impacts of the proposed development as part of the EIA Consideration will also need to be given to the possible impacts, including cumulative, on the wider historic environment."	Likely significant heritage impacts have been assessed in Chapter 12, Cultural Heritage. Potential cumulative impacts on the wider historic environment will be assessed in the ES.
Paragraph 5.10.16: "The applicant should carry out a landscape and visual impact assessment and report it in the ES, including cumulative effects."	A Landscape and Visual Impact Assessment (LVIA) has been undertaken in Chapter 11, Landscape and Visual Impact Assessment. Potential cumulative impacts on the wider historic environment will be assessed in the ES.



KEUPER GAS STORAGE PROJECT CUMULATIVE EFFECTS ASSESSMENT

Requirement of NPS EN-1	Consideration within Chapter
Paragraph 5.13.4: "The applicant's assessment should consider all relevant socio-economic impacts, which may include:cumulative effects – if development consent were to be granted for a number of projects within a region and these were developed in a similar timeframe, there could be some short-term negative effects, for example a potential shortage of construction workers to meet the needs of other industries and major projects within the region."	All relevant socio-economic impacts have been assessed in Chapter 13, Socio-economic Characteristics and Chapter 14, Population and Human Health. Cumulative effects will be assessed in the ES.
Paragraph 5.14.21: "The Secretary of State should only consider refusing development on highways grounds if there would be an unacceptable impact on highway safety, residual cumulative impacts on the road network would be severe, or it does not show how consideration has been given to the provision of adequate active public or shared transport access and provision."	Potential effects of the Proposed Development on traffic and transport are not anticipated to be materially different to that of the Consented Development, and as a result has been scoped out of the PEIR.
Paragraph 5.16.7: "The ES should in particular describe:any cumulative effects."	Scope and approach of Cumulative effects have been identified within this chapter which will then be assessed in the ES.



The National Planning Policy Framework (NPPF) (2025)4

- The NPPF sets out government's planning policies for England and 18.2.2.3 how these are expected to be applied. Requirements within the NPPF relating to cumulative effects are detailed below.
 - "However, in the context of the Framework and in particular the presumption in favour of sustainable development arguments that an application is premature are unlikely to justify a refusal of planning permission other than in the limited circumstances where both: a) the development proposed is so substantial, or its cumulative effect would be so significant, that to grant permission would undermine the plan-making process by predetermining decisions about the scale, location or phasing of new development that are central to an emerging plan" (Paragraph 50);
 - "Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network, following mitigation, would be severe, taking into account all reasonable future scenarios." (Paragraph 116);
 - "To help increase the use and supply of renewable and low carbon energy and heat, plans should: a) provide a positive strategy for energy from these sources, that maximises the potential for suitable development, and their future re-powering and life extension, while ensuring that adverse impacts are addressed appropriately (including cumulative landscape and visual impacts)." (Paragraph 165);
 - "Strategic policies should be informed by a strategic flood risk assessment, and should manage flood risk from all sources. They should consider cumulative impacts in, or affecting, local areas susceptible to flooding, and take account of advice from the Environment Agency and other relevant flood risk management authorities, such as lead local flood authorities and internal drainage boards." (Paragraph 171);
 - "Planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on

⁴ UK Government. (2025). National Planning Policy Framework. (Online). Available at: National Planning Policy Framework - GOV.UK



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- health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development." (Paragraph 198);
- "Planning policies and decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas."
 (Paragraph 199); and
- "Planning policies should...set out criteria or requirements to ensure that permitted and proposed operations do not have unacceptable adverse impacts on the natural and historic environment or human health, taking into account the cumulative effects of multiple impacts from individual sites and/or a number of sites in a locality" (Paragraph 223);

Planning Practice Guidance (PPG) for EIA (2020)⁵

18.2.2.4 Paragraph 024 of the PPG for EIA (2020) states that "each application (or request for a screening opinion) should be considered on its own merits. There are occasions, however, when other existing or approved development may be relevant in determining whether significant effects are likely as a consequence of a proposed development. The local planning authorities should always have regard to the possible cumulative effects arising from any existing or approved development."

18.2.3 LOCAL PLANNING POLICY

- 18.2.3.1 The Chesire West and Chester Council (CWAC) Local Plan is split into Part One and Part Two. Part One of the Local Plan was adopted in January 2015⁶, whilst Part Two was adopted in July 2019⁷.
- 18.2.3.2 Within CWAC Local Plan (Part Two), Policy DM 53 Energy Generation, Storage and District Heat Networks states that "the cumulative impacts of existing and proposed developments on the landscape, natural environment and surrounding users will be acceptable".

⁷ Cheshire West and Chester Council (2019). Local Plan (Part Two). (Online). Available at: <u>Cheshire West and Chester Local Plan (Part Two) Land Allocations and Detailed Policies - Keystone</u>



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⁵ UK Government. (2020). Planning Practice Guidance for Environmental Impact Assessment. (Online). Available at: <u>Planning practice guidance - GOV.UK</u>

⁶ Cheshire West and Chester Council. (2015). Local Plan (Part One). (Online) Available at: <u>Cheshire West and Chester Local Plan (Part One) Strategic Policies - Keystone</u>

18.2.4 GUIDANCE

- 18.2.4.1 This CEA has been prepared in line with the following guidance as detailed in **Chapter 4**, **EIA Methodology and Consultation**:
 - Planning Inspectorate's Advice on Cumulative Effects Assessment (2025)¹; and
 - The Planning Inspectorate's Advice Note Seven: Environmental Impact Assessment: Process, Preliminary Environmental Information and Environmental Statements Version 7, 20208.
- 18.2.4.2 The CEA also considers the Institute of Environmental and Sustainability and Environmental Professionals (ISEP) Impact Assessment Outlook Journal, Volume 7: July 2020⁹ which focuses on demystifying cumulative effects.

18.3 CONSULTATION

18.3.1.1 This section provides a summary of the consultation undertaken to date on the CEA for the Proposed Development.

18.4 EIA SCOPING

- 18.4.1.1 A Scoping Opinion was sought from the Planning Inspectorate to determine the content of the assessment, as well as the approach and methods to be used. A Scoping Opinion was received from the Planning Inspectorate in June 2025.
- 18.4.1.2 **Table 18.2** summarises how this chapter of the PEIR addresses key points from the EIA Scoping Opinion comments related to cumulative effects.

https://www.google.com/url?sa=t&rct=j&q=&esrc=s&source=web&cd=&cad=rja&uact=8&ved=2ahUKEwjcnuiVsuKPAxVPU6QEHWWRMU8QFnoECBkQAQ&url=https%3A%2F%2Fwww.iema.net%2Fmedia%2Fnbsdjhlf%2Fia-outlook-journal-vol-7.pdf&usq=AOvVaw1x7K1nuPfdyt6S22zwq3VN&opi=89978449



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⁸ UK Government. (2020). Advice Note Seven: Environmental Impact Assessment: Process, Preliminary Environmental Information and Environmental Statements. (Online). Available at: <u>Nationally Significant Infrastructure Projects - Advice Note Seven: Environmental Impact Assessment: process, preliminary environmental information and environmental statements - GOV.UK</u>

⁹ Institute of Sustainability and Environmental Professionals. (2020). Impact Assessment Outlook Journal, Volume 7. (Online). Available at:

TABLE 18.2 - SCOPING OPINION

Consultee	Reference	Issue	Comment	Response to Comment
The Planning Inspectorate	2.1.3	Hydrogen Above Ground Installation (HAGI)	"The Inspectorate notes the proposed HAGI for connection to the HyNet hydrogen transmission system, which is to be consented as a separate project by Cadent. The updated ES should include an assessment of cumulative effects with the HAGI, where likely significant effects could occur."	Noted and accepted. The HAGI is discussed below in Section 18.7. The interaction between the Proposed Development and HAGI to be fully assessed as part of the ES within Chapter 18, Cumulative Effects Assessment.
The Planning Inspectorate	2.2.5	Assessment – cumulative effects assessment	"Paragraph 8.4.1.3 of the Scoping Report identifies that the largest distance at which proposed development could potentially have impacts is taken to be 2km, as the proposed development is not anticipated to have any substantive pollutant emissions to air. However, Table 8.1 identifies 5km as the proposed study area for cumulative effects. It is not clear what study area is proposed to be applied to the cumulative effects assessment or how this has been determined. Furthermore, the Inspectorate notes from Technical Appendices C (Air Quality) and F (Ecology and	Noted. Study Areas for CEA for each environmental topic to be provided in Chapters 6-17 of the ES.



CUMULATIVE EFFECTS ASSESSMENT

Consultee	Reference	Issue	Comment	Response to Comment
			Nature Conservation), the study area and zone of influence (ZoI) considered for emissions to air from the proposed development may be as far as 10km from the proposed development. It is not yet known which technology would be applied to the proposed development or the likely significant effects arising from the chosen technology. The ES should clearly state and justify the chosen study area for the cumulative effects assessment."	

BASIS OF THE ASSESSMENT 18.5

- 18.5.1.1 The CEA is based on the following:
 - The contribution of the Proposed Development to impacts on receptors as predicted in the various topic assessments elsewhere in the PEIR (Chapters 6-17), which in turn are based on a worst-case or Rochdale Envelope approach where appropriate; and
 - Readily available information from the public domain on the impacts of other planned projects or developments on the same receptors.

ASSESSMENT METHODOLOGY OVERVIEW 18.6

- 18.6.1.1 The methodology for the CEA is guided by the Planning Inspectorate's Advice Note Seven: Environmental Impact Assessment: Process, Preliminary Environmental Information and Environmental Statements Version 7, 2020, which follows a fourstage approach:
 - Stage 1: Establishing the long list of other existing and, or approved development;
 - Stage 2: Establishing a short list of other existing and, or approved development;
 - Stage 3: Information gathering;
 - Stage 4: Assessment.
- 18.6.1.2 The methodology for each stage of the CEA process is described in the following sections.

18.7 CEA STAGE 1

- 18.7.1.1 Stage 1 of the CEA involved establishing a long list of other existing and / or approved developments. Zones of Influence, defined by each environmental topic, were taken into consideration when establishing the long list of other developments. The Zones of Influence for each environmental topic will be listed and presented in a figure which will accompany the ES.
- 18.7.1.2 The long list of other developments is not limited to those identified in Chapter 8: Cumulative Effects Assessment of the Scoping Report and has continuously been updated. The long list of other developments will also be updated for the ES.



18.7.2 LONG LIST OF OTHER DEVELOPMENTS

18.7.2.1 The long list of other developments is presented below in **Table 18.3**. This long list will be updated four months prior to submission to create final 'other developments' for consideration within the ES.



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TABLE 18.3 - LONG LIST OF OTHER DEVELOPMENTS

Application Reference	Summary Description of Development	Status	Screened In / Out of Stage 2?
N/A - Hydrogen Above Ground Installation (HAGI) for the Cadent Hydrogen Pipeline (22/03592/REQ) within the Proposed Development Site Boundary	To support the change from natural gas to hydrogen, the proposed NTS compound for natural gas is being replaced by the HAGI for connection to the HyNet hydrogen transmission system. The NTS from the Consented Development will no longer be constructed, and instead the HAGI will be progressed by Cadent as part of the HyNet North West Hydrogen Pipeline project. The construction, operation & maintenance and decommissioning of the HAGI is not part of the Proposed Development, however elements of the connection infrastructure will be located within the HAGI compound. The HAGI has been included in the PEIR and layout drawings for informative purposes but, the interaction between the HAGI and the Proposed Development will be assessed in Chapter 18, Cumulative Effects of the ES. The footprint of the HAGI will also be assessed as part of the HyNet North West Hydrogen Pipeline DCO application.	Awaiting Decision	Stage 2 of the CEA will be completed at the ES stage.
25/01122/REQ	Discharge of requirement 6 (stage 1) 6 (stage 2) 7 (stage 1) and 11 of the Hynet Carbon Dioxide Pipeline Development Consent Order (DCO).	Awaiting Decision	
22/03592/REQ	Hydrogen Pipeline	Awaiting Decision	
23/02929/FUL	Installation of a solar array and erection of associated fencing	Approved	
21/05070/OUT	Outline planning permission for a mixed use development of up to 1,550 units of residential dwellings; up to 11,000 sqm of specialist accommodation for older people including residential care home; local centre and active ground floor uses comprising up to 600 sqm of flexible floorspace for retail; up to 275 sqm of health, nursery and community; up to 7,700 sqm of employment space; up to 950 sqm of cafe, restaurant, takeaway and public house floorspace; up to a 2,250 sqm primary school with associated playing fields and associated road infrastructure, landscaping, public realm and amenity space.	Awaiting Decision	
20/03125/FUL	Erection of units for industrial/warehouse/storage use with associated ancillary facilities, servicing and access.	Approved	
20/02109/FUL	Construction of a Distribution Network Operator substation, Gas Insulated Substation building, Waste To Energy (WTE) electrical room, 2no. switchgear, 5no. car parking spaces, generator kiosk, security fencing and associated hard-standing.	Approved	
23/03965/FUL	Installation of a new Distiller Blow Off Pipeline System and associated development.	Awaiting Decision	
23/02047/OUT	Outline planning application for the erection of up to 100 residential dwellings	Awaiting Decision	
23/01531/FUL	The drilling and solution mining of four new additional brine cavities, retention of soil storage area, underground cabling and pipework, continuation of access tracks and development of associated above and below ground infrastructure (Phase 7 Project).	Approved	
20/04118/FUL	Creation of a solar farm	Approved	_



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Application Reference	Summary Description of Development	Status	Screened In / Out of Stage 2?
20/01566/MIN	Installation of two pipelines, new stoned area, new pump and instrumentation local to H157 wellhead, installation of a dosing unit housed in a cabin on a temporary basis (approximately 2 years) and secure fencing.	Approved	
25/01218/OUT	Outline planning application for the erection of up to 70 dwellings	Awaiting Decision	
24/03682/FUL	Erection of up to 120 dwellings	Awaiting Decision	



18.8 CEA STAGE 2

- 18.8.1.1 Stage 2 of the CEA will involve screening the long list to produce a shortlist of developments. The screening process will consider the temporal scale of other developments in relation to the Proposed Development and their likelihood to lead to cumulative effects.
- 18.8.1.2 Stage 2 of the CEA will be completed as part of the ES following the finalisation of the long-list noted above (4 months before MC application submission).

18.8.2 TEMPORAL CONSIDERATIONS

- 18.8.2.1 An overlap between the construction phase of the Proposed Development and that of other developments could lead to cumulative effects.
- 18.8.2.2 Other developments will be screened as 'possibly cumulative during construction' where an overlap between construction phases is likely. The other developments to be considered will be limited to a five-year period preceding the date of submission of the ES since planning permissions typically expire after a period of three to five years.
- 18.8.2.3 The CEA will assume a worst-case scenario, where the operation and maintenance phase of the Proposed Development overlaps with all other developments considered.

18.8.3 TECHNICAL CONSIDERATIONS

- 18.8.3.1 Not all the impacts of the Proposed Development could lead to cumulative effects with impacts from other developments. In addition, for the Proposed Development to have cumulative effects on the same receptor as other developments, the receptor would need to be within a Zone of Influence (ZoI) for the impact to be concerned.
- 18.8.3.2 Each ZoI will take into consideration the areas / receptors likely to be affected by the Proposed Development, including its facilities and the activities associated with its construction, operation and maintenance, and decommissioning.

18.8.4 SHORT LIST OF OTHER DEVELOPMENTS

18.8.4.1 Stage 2 of the CEA and the associated short list of other developments will be prepared and presented at the ES stage.

18.9 CEA STAGES 3 AND 4

- 18.9.1.1 Stage 3 is primarily focused on collecting further information relating to the other developments specified in the short list to inform Stage 4. Information collected at Stage 3 will include, but will not be limited to:
 - · Proposed design and location information;



- Proposed programme construction, operation and decommissioning; and
- Environmental assessments that set out baseline data and effects arising from the other existing and, or approved development.
- 18.9.1.2 This information will be collected from numerous data sources, such as the Planning Inspectorate and the Cheshire West and Chester Council (CWAC) Local Planning Authority (LPA).
- 18.9.1.3 Stage 4 of the CEA will assess the cumulative effects of the Proposed Development with the other existing and / or approved developments identified in Stages 1-3. As more information is collected, the CEA will move from a qualitative to a more quantitative assessment.
- 18.9.1.4 Although the CEA will be carried out using a precautionary approach, it is also intended to be proportionate and appropriate to the level of information available.
- 18.9.1.5 Stage 4 of the CEA will consider the following criteria:
 - Duration of effect;
 - Extent of effect;
 - Type of effect;
 - Frequency of effect;
 - Value and resilience of the receptor affected; and
 - Likely success of mitigation.

18.10 SUMMARY AND NEXT STEPS

- 18.10.1.1 This preliminary CEA has identified a long list of developments that may lead to cumulative effects.
- 18.10.1.2 The potential cumulative effects of the Proposed Development will continue to be assessed, and a full assessment will be included in the ES, in line with the methodology outlined in this chapter.



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