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Sent by email to:
consultation@peakcluster.co.uk

Dear sir/madam

PHASE 1 CONSULTATION ON PEAK CLUSTER PROJECT - REPRESENTATION BY CPRE CHESHIRE

I am writing on behalf of the Cheshire branch of the Campaign to Protect Rural England (CPRE).

Who are we?

CPRE campaigns for a thriving and beautiful countryside. We work alongside other charities to encourage a sustainable “brownfield first” approach to meeting development needs, which will achieve a true balance of economic, social and environmental objectives. With several hundred members in our local branch (both individuals and organisations) and many supporters we represent an important community voice in Cheshire and adjacent parts of the Liverpool and Greater Manchester city regions.

CPRE Cheshire covers that portion of the proposed Peak Cluster project which extends from the eastern boundary of Cheshire East to the Wirral coast. Our branch does not cover the parts of the scheme which fall within Derbyshire or Staffordshire. We understand that a separate response may be submitted to this or future consultations on behalf of CPRE branches covering those areas.

General principles

CPRE Cheshire acknowledges the important role that cement manufacture plays in the construction and other industries. We also note that 40% of UK production is based in the Peak District and that there is a pressing need to reduce the carbon emissions associated with the industry. However, it is essential that this is done in a way which avoids or minimises other environmental harms.

In CPRE Cheshire’s view, a national priority should be to de-carbonise the construction industry by maximising the use of recycled aggregates and other viable and suitable alternatives to cement which are less carbon intensive. In this wider context the proposed Peak Cluster Carbon Capture and Storage (CCS) scheme is not strictly a “de-carbonisation” project as its emphasis will be on capturing and storing rather than reducing the amount of CO2 which is generated. Whilst we understand the need argument which has been put forward for CCS it is important that appropriate wider efforts to de-carbonise the industry are progressed as quickly as is practicable.

Impacts of the project on the countryside in Cheshire

CPRE Cheshire notes that the current consultation is being undertaken at a time when many details have yet to be defined. Although we understand that an Environmental Statement (ES) will be prepared this has only reached the Scoping Opinion stage to date. Whilst we welcome early-stage engagement this has the consequence that many aspects are unknown, for example: the precise alignment of the piping; the location, height and design of above-ground infrastructure; and any compensation packages for farmers and other landowners.

It is however inevitable that the scheme will have impacts on our branch area. These include temporary impacts whilst the underground infrastructure is laid and also permanent above-ground impacts. **We are particularly concerned about the permanent harm that could be caused by the Above Ground Infrastructure sites (AGIs).** For example, the Wirral AGI with an estimated ground area of 300 X 180 metres, buildings of up to 15 metres in height and a 50-metre high chimney is likely to cause substantial loss of openness and visual harm within the Wirral Green Belt. Whilst the other AGIs near Macclesfield, Holmes Chapel and Ellesmere Port would be smaller they could also have detrimental effects if insensitively sited and could cause harm to Green Belt and/or open countryside areas. In addition, we understand that the area immediately above the sunk pipeline has to remain accessible, but it is unclear how wide an area would be involved. We urge that every step is taken to mitigate and avoid harms in the event of the scheme progressing to its next stages.

Green Belt, countryside and landscape character

We note that most of the length of the scheme proposed within our Cheshire branch area would be in countryside or urban fringe areas, which in turn include:

- Those parts of the Peak District National Park that lie within the boundaries of Cheshire East.
- Those north eastern parts of Cheshire East that lie within the Peak Park Fringe.
- Substantial areas (mainly around Congleton, Macclesfield, Chester, Ellesmere Port and Wirral) which are designated as Green Belt.
- A number of areas designated in Local Plans for their special landscape value.
- Remaining areas which are outside the above designations but which are nevertheless within attractive open countryside e.g. the length of the scheme through central/southern Cheshire.
- Several river basins and potentially some canals.

Each of the above-mentioned designations carry specific implications which must be taken into account in the assessment and design of the scheme. For example, in the Green Belt areas any development should address the openness and specific purposes of this designation. National policy requires that substantial weight be attributed to harm to the Green Belt. The special qualities of the National Park and local landscape designations need to be protected. The scheme must be designed in a way which minimises impacts upon all these designations and on the open countryside.

Biodiversity

It is inevitable that a scheme of this scale and nature would have effects on biodiversity which must be addressed. The scheme must be designed so as to avoid harm to irreplaceable habitats such as ancient woodlands and important peat deposits. Designated sites must be protected in line with their ecological significance, and harm to protected species must be avoided in line with legal requirements. All harms must be avoided, adequately mitigated or as a last resort compensated for in line with paragraph 193a)

of the National Planning Policy Framework. A fully evidenced Biodiversity Net Gain of at least 10% should be delivered. Protection, mitigation and enhancement measures must comply with the priorities set out in the Cheshire and Warrington and Liverpool City Region Local Nature Recovery Strategies.

Recreation in the countryside

It is also likely that the proposal would affect recreational users of the countryside, for example by disturbing the alignment of public rights of way and bridleways, and by causing noise and other disturbance during the construction period. The scheme must be designed to minimise or eliminate these impacts.

Agricultural land quality and the farming industry

The scheme is likely to affect substantial areas of agricultural land identified as grade 2 “very good” or grade 3 “good to moderate”. It is essential that a full assessment of agricultural land quality is undertaken to inform the development of the scheme. Impacts upon all agricultural land must be minimised for example by using land of lower quality as a preference for any areas which would be permanently lost to development or to allow future access, minimising the construction period, and effectively storing and replacing top soils. Harm to the viability of farm holdings must be avoided.

Safety and pollution control

We are aware that concerns have been raised by some local residents about public safety and pollution control issues, for example connected with the pumping of CO₂ gas at high pressure and perceived risks of rupture and gas escape. It should go without saying that the scheme must not progress unless it is confirmed that these matters would be fully addressed via the relevant regulatory controls.

Community engagement

This letter does not attempt to address all the concerns which we understand have been raised by local communities along the route of the project. It is imperative that any further development of the scheme be informed by further detailed engagement with local communities, and that all material factors raised by them are addressed.

Central Feeder AGI – south west of Macclesfield

The area of search for this AGI covers a large area of attractive countryside, which is designated as Green Belt. Part of the area is also within the Alderley Edge and West Macclesfield Wooded Estates Local Landscape Designation. It is essential that any development within this area protects its special qualities which are set out in page 37 of the Cheshire East Local Landscape Designation Review 2018. These include the following (amongst others):

- *Frequent mature trees (including specimen oaks) and large woodland blocks, including ancient woodland sites, creating texture and wider estate character.*
- *The cohesiveness of the estate landscapes, many focused around distinctive historic buildings set within an undulating and wooded landscape of fields linked by quiet country lanes.*
- *High recreational amenity and open space value, providing an important resource to nearby urban areas.*
- *Sparsely settled, strongly agricultural landscape with numerous scattered farm buildings and*

country houses and halls with strong vernacular styles.

- *Varied views, with visibility often limited by woodland. Longer views across the borough are from higher vantage points.*
- *An intact rural landscape with few detracting elements. A rich variety of woodland cover and a lack of intrusion from major infrastructure and development contribute to a sense of enclosure and tranquillity.*

Whilst the area appears to be mainly grade 3 farmland according to the broad brush ALC map it is essential that loss of such farmland is minimised or preferably avoided. Further study is needed to identify and avoid areas which are grade 3a upwards ("best and most versatile") land.

Connection AGI1 – north west of Holmes Chapel

Whilst this site falls outside the Green Belt and any formal landscape designation, it is nevertheless an area of open rural countryside within which development impacts must be avoided or minimised.

Connection AGI2 (south of Ellesmere Port) and AGI3 (west of Ellesmere Port)

These locations fall within the Green Belt. It is important that any development here should protect the openness and purposes of the Green Belt in this area.

Coastal AGI – north Wirral

This location falls within the Green Belt. We are particularly concerned about the scale of this AGI, with an estimated ground area of 180 X 300 metres, buildings of up to 15 metres in height and a chimney of up to ca 50 metres in height, and the resultant harm that would be caused to the openness, purposes and visual appearance of the Wirral Green Belt. The area is also particularly sensitive in ecological terms due to its proximity to the Wirral coastline, which is a designated Ramsar site and Special Area of Conservation. These designations are of the highest level and it is vital that development should avoid harm to them. The area is also important in recreational terms due to its positioning in relation to the North Wirral Coastal Park and King Charles III Coastal path, which is well used by walkers, cyclists and other recreational users. Harm to the enjoyment of recreational users must be avoided.

Conclusion

I would be grateful if the comments set out above could be taken into account in decisions about the future development of the Peak Cluster project and would like to be appraised of at what point a draft Environmental Statement (ES) and Biodiversity Net Gain Assessment will be available. Thank you.

Yours Sincerely,

Jonathan Clarke,
Chair of CPRE Cheshire