

CCSA Permitting & Planning Working Group (UK)

21/05/2025
14:00 (BST)



House keeping & Introductions

- Slides & Recording will be available for members after the meeting.
- CCSA Competition Law Policy notice is attached to the meeting invite and available on the CCSA website.
- If you are not speaking, please mute your microphone.
- Please **raise your hand** if you wish to comment, you will be invited to come off of mute, if you can also turn on your camera.
- Please also pose any **comments in the chat** and these will be picked up by the secretariat.
- **Introduction** of any new members.

Agenda

	Time	Topic	Speaker
1.	14:00	Introductions & housekeeping	CCSA Secretariat
2.	14:05	CCSA Working Group Structure	CCSA Secretariat
3.	14:10	Planning & Permitting Updates	CCSA Secretariat
4.	14:30	Forward plan for the group and priority setting	All attendees
5.	14:45	Discussion: Cumulative impacts workstream	All attendees
6.	15:15	Conclusions & AOB	CCSA Secretariat

CCSA communications

We are changing the way we send CCSA Working Group & Forum email and invitations, allowing members to opt in and out of meetings and distribution lists.

- ✓ Please ensure you **add the new additional domain to your safe sender list** in your email platform: email.ccsassociation.org
- ✓ Going forward we ask members to **download the iCal file from our emails and add it to your calendar.**



You are receiving this invite as you are subscribed to the CCSA members mailing list. You can update your subscriptions to CCSA mailings lists via the [Manage preferences](#) link below.

Carbon Capture & Storage Association, (CCSA), London, Brussels
[Unsubscribe](#) [Manage preferences](#)

If you're planning to attend, please **download the iCal and accept the meeting invite** 📧

Download the iCal

New CCSA working group structure

Based on member feedback, we are implementing a revised working group structure to better cover key topics, enhance input, and provide timely, relevant information.

- As of 1st April 2025, this “*Permitting and Planning Task Subgroup*” has been renamed as the **“Permitting and Planning Working Group (UK)”**
 - This will be a UK focussed Working Group.
 - The final Terms of Reference will be shared with members after today’s discussion.
 - The group will convene on a ‘needs basis’ (likely 3 times per year) to reflect the growing work in this area.
- You can find the full update on the CCSA’s working group structure [here](#)

New CCSA Working Group Structure



Permitting & Planning Updates

Max Musing & Despoina Tsimprikidou
CCSA



Consultations

Organisation	Recently completed consultations (x9)	Date
MoJ	Judicial review and NSIPs	30 Dec
MHCLG	Planning Reform: Streamlining Infrastructure Planning	6 Feb
Welsh Government	Preferred Policy on CCUS	24 Feb
HMT	10-year Infrastructure Working Paper	28 Feb
EA	EALs for CCS	13 Mar
DESNZ	Building the North Sea's Energy Future	30 Apr
EA	Decarbonisation Readiness Guidance	9 May
ESNZ Committee	Inquiry: National Planning for Energy Infrastructure	12 May
Welsh Government	Hydrogen Policy	16 May

Organisation	Open consultations (x1)	Date
DESNZ	Revisions to National Policy Statements	29 May

Organisation	Overdue or expected consultations (x2)	Date
HSE	Requirements for HSE regulation to facilitate CCUS and Hydrogen deployment	2024 (now expected in 2025)
MHCLG	National policies for planning decisions	Spring 2025
DEFRA	EPR Reform	June 2025

Planning & Infrastructure Bill

- The CCSA is continuing to develop its position on the Planning and Infrastructure Bill – in collaboration with other trade associations; most notably Energy UK and Renewable UK.
- In terms of process insights:
 - ❑ *The bill team appears reluctant to engage at this stage and is avoiding detailed scrutiny.*
 - ❑ *Their aim is to push the bill through committee stage by 1 June.*
 - ❑ *After this, it is expected to spend significant time in the House of Lords – this is likely the best opportunity for more targeted engagement.*
- **The CCSA is mostly supportive of the Bill**, however there are areas which could be amended to allow for streamlined cluster deployment.
- The majority of our discussions are being fed through the **CCSA Legislation Working Group**.
- Please let me know if you would like to be added to this group, or update your preferences.

You are receiving this invite as you are subscribed to the CCSA members mailing list. You can update your subscriptions to CCSA mailings lists via the Manage preferences link below.

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Planning and Infrastructure Bill

[AS INTRODUCED]

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CHAPTER 1
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- 4 Applications for development consent: consultation
- 5 Applications for development consent: consultation with Category 3 persons
- 6 Applications for development consent: acceptance stage
- 7 Applications for development consent: costs
- 8 Planning Act 2008: legal challenges

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Connections to the electricity transmission and distribution systems

- 9 Connections to electricity network: licence and other modifications
- 10 Scope of modification power under section 9
- 11 Procedure relating to modifications under section 9
- 12 Directions to modify connection agreements
- 13 Managing connections to the network: strategic plans etc

Consents for electricity infrastructure in Scotland

- 14 Consents for generating stations and overhead lines: applications
- 15 Variation of consents etc
- 16 Proceedings for questioning certain decisions on consents
- 17 Applications for necessary wayleaves: fees
- 18 Regulations
- 19 Sections 14 to 18: minor and consequential amendments
- 20 Environmental impact assessments for electricity works

Bill 196 59/1

CCSA response to the Revised NPSs consultation

- The consultation opened on the 24th April.
- The CCSA has conducted one round of comments with members already.
- Not a full response, as some of the questions fall outside of our remit – most notably revisions to onshore/offshore wind NPS policy. However **we have focused on CP30, the NESOs SEPs, and additional ways in which planning could be streamlined.**
- There is still an opportunity to inform our response.
- A second draft will be **circulated today**, with our submission going into DESNZ on/before **Thursday 29th May.**



Department for
Energy Security
& Net Zero

Consultation | Planning for New Energy Infrastructure

Revised draft National Policy Statements for
energy infrastructure

Closing Date: 29 May 2025

April 2025

CCSA response to the Revised NPSs consultation – Key Positions

CP30

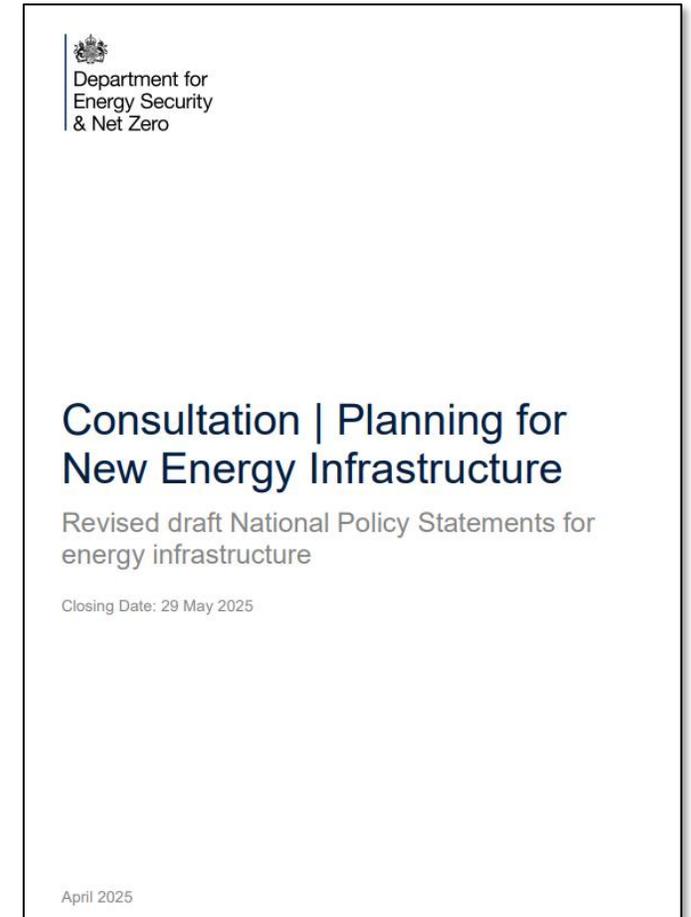
- The inclusion of Clean Power 2030 (CP30) policy within EN-1 should help to inform planning / developer decisions to bring forward projects and maintain energy transition momentum and progress towards net zero. But consider:
 - **Infrastructure requirements beyond energy?**
 - **CCUS build out beyond 2030?**
 - **EfW – which is not in the CP30 advice** – now does not receive CNP policy.
 - **Technologically specific regional variances are not detailed in CP30.**

The NESOs SEPs

- The NESOs advice should better inform planning decisions – given the significant resource that is being invested. However, **it should not be viewed in isolation**, as the NESOs SEPs can't account for all energy infrastructure citing considerations.

Additional Points

- **Developing the dedicated CCUS NPSs should be a priority.**
- Planning system resourcing remains a long-standing problem.
- Other parts of the CCUS value chain could benefit from CNP policy provision.



A second draft will be **circulated today**, with our submission going into DESNZ on/before **Thursday 29th May**.

Substance	CAS number	Proposed short-term (ST) EAL mg/m ³	Proposed long-term (LT) EAL mg/m ³
2-amino-2-methylpropanol (AMP)	124-68-5	None	0.007
2-(diethylamino)ethanol (DEELA)	100-37-8	None	0.11
Diethanolamine (DEA)	111-42-2	None	0.003
Diethylamine (DiEA) / N-Ethylethanamine	109-89-7 / 61193-06-4	0.33	0.033
Morpholine (MOR)	110-91-8	0.04	None
N-nitrosomorpholine (NMOR)	Not Applicable	0.000037	0.000005
Piperazine (PZ)	110-85-0	None	0.015

- Additional evidence received on AMP → this substance is being revisited by the EA.
- EAL consultation response will be published shortly after.
- EA considering work on additional substances.
- EA published [EAL derivation methodology](#).
 - Would members be interested in a dedicated teach-in session?

EPR Reform

Streamlining permitting

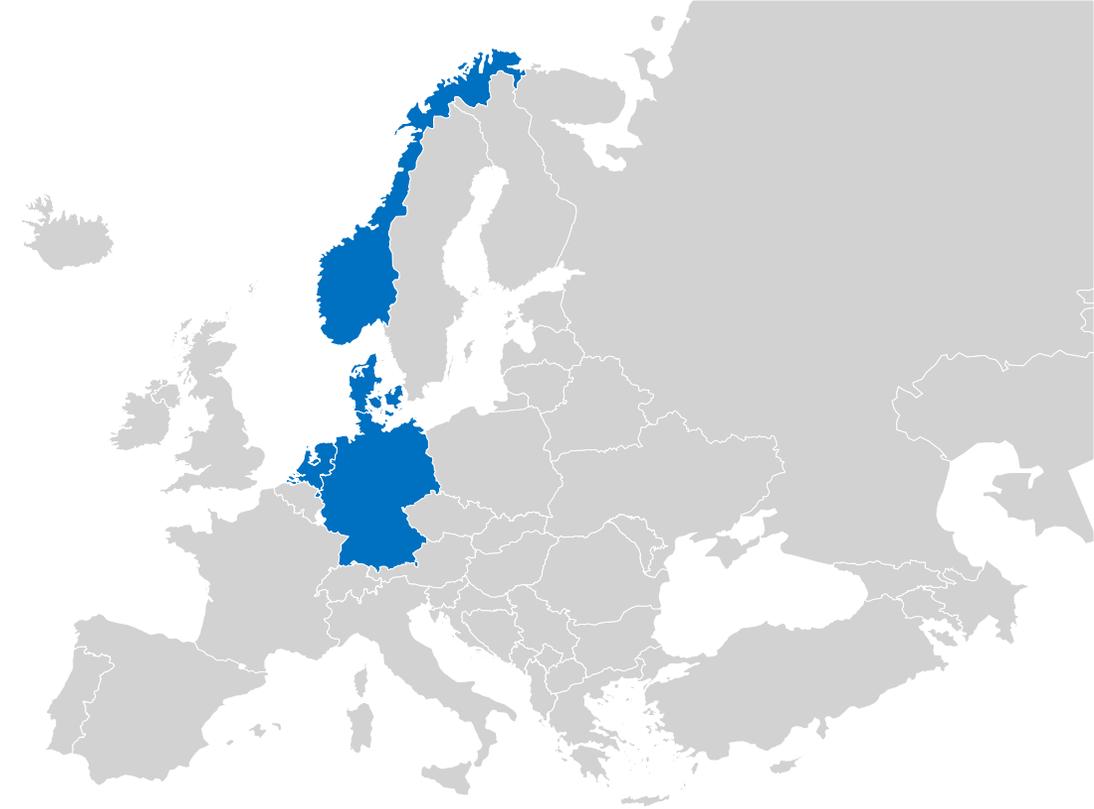
- Significant permitting delays for FOAK CCUS projects
- Regulatory approach to risk management
- Alignment of EPR with other regimes
- Regulatory statutory duties

Clarity on water license review processes

- Certainty of access to water
- Time limited abstraction licenses
- Transition of abstraction licensing to EPR

Solvent Confidentiality for environmental permitting of CCUS

- Lack of protection for capture technology developers' Intellectual Property
- Need for second-generation solvent UK market and associated environmental benefits of proprietary solvents



CCSA input on “Reforming the environmental permitting framework for industry”

Thursday 10th April 2025

Permitting & Planning Priority Work Areas

All



DRAFT - Terms of Reference for the Permitting & Planning Working Group (UK)

Mission

The P&P Working Group comprises individuals drawn from the broader membership of the CCSA, representing the whole CCUS value chain, whose aim is to identify and address environmental permitting, planning processes as well as environmental impacts of CCUS, GGR and low-carbon hydrogen projects.

Role

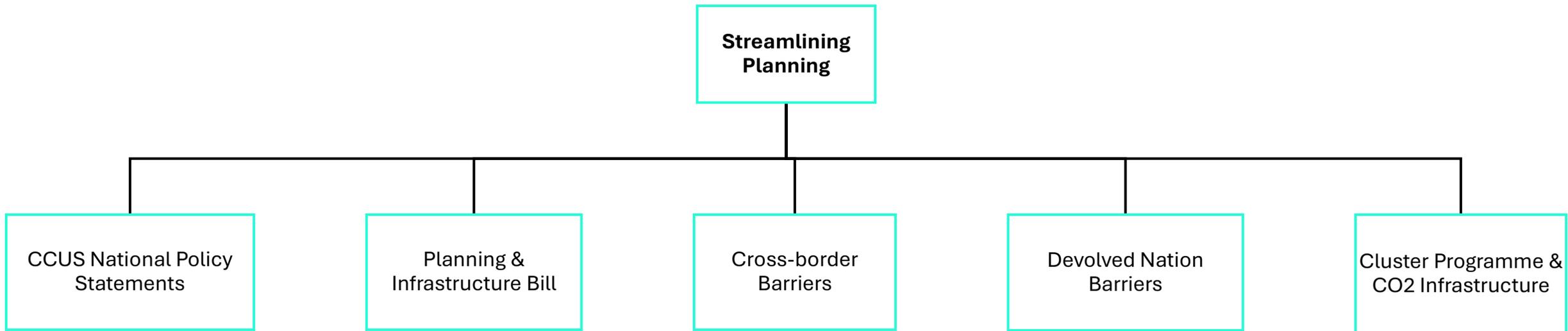
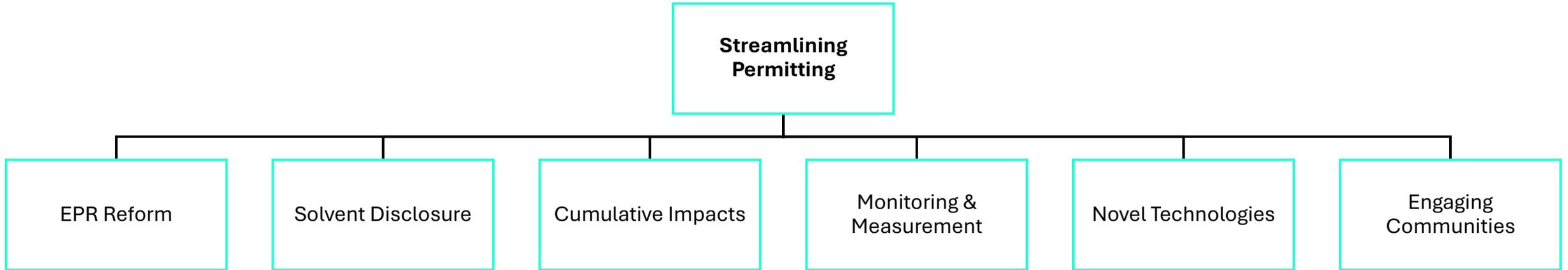
The Working Group has the following potential roles:

- Identify key permitting and planning challenges, barriers and blockers facing CCUS, GGR and low-carbon hydrogen projects.
- Develop recommendations and plans to address these challenges.
- Convene to agree on common industry positions when responding to relevant consultations.
- Coordinate industry engagement with UK regulators such as the Environment Agency, Natural Resources Wales, SEPA and DAERA and others.
- Help raise public understanding and awareness of the environmental impacts of CCUS projects and promote community engagement during permitting and planning processes.

Resources

- Members' time and costs, as provided by their employers (where appropriate).
- Administrative and secretariat support is provided by the CCSA.
- External resources as required and as approved by the CCSA Board.

Discussion: Permitting & Planning Priority Work Areas



AOB & Conclusions

- Review actions arising from the meeting.
- Next Meeting: **25 September 2025**
- AOB

