CCSA Permitting & Planning Working Group (UK)

25/09/2025
10:00 – 12:00 (BST)

CCSA

House Keeping & Introductions

- This meeting is being recorded
- Slides and recording will be available for members after the meeting
- CCSA Competition Law Policy notice is attached to the meeting invite
- 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 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.
- Introductions of any new members joining the call.

Agenda

	Time	Topic	Speaker
1.	10:00 [5 mins]	**Introductions & CCSA competition law policy notice**	Matt Brown, RWE (Chair)
2.	10:05 [15 mins]	**Permitting & Planning Updates** • CCSA Delivery Plan Actions & Recommendations • Streamlining planning reform • Cumulative Impacts	CCSA Secretariat
3.	10:20 [5 mins]	**Water Updates** • Cunliffe Review • National Water Framework	Nicola Smith, SSE
4.	10:25 [30 mins]	**Presentation: Environmental Capacity in Industrial Clusters**	Tom Glyn-Jones, Mark Ellis-Jones (Environment Agency)
5.	10:55 [60 mins]	**Modernising Environmental Permitting for Industry Consultation** • Overview of relevant consultation areas by Defra • CCSA Member Positioning & Input	DEFRA All
6.	11:55 [5 mins]	**AOB, next steps and next meeting date**	Matt Brown, RWE (Chair)

Permitting & Planning Updates

Max Musing & Despoina Tsimprikidou
CCSA

CCSA

CCUS Delivery Plan – Emerging issues

1. **Transport and/or storage projects are developing that don't anticipate government funding support** for their part of the chain (although they depend on capture projects happening).

2. **Many T&S projects intend to store CO_2 captured outside the UK**.

3. **Most companies are still investing in project development**, and projects are moving through the development phases, but this is progressing more slowly than it would under a clearer policy regime. Companies with multiple projects are now focusing in on one or two.

4. **Over the last few years, deindustrialisation is a notable trend, with industries that need CCS to decarbonise being shut down.** Some retrofit projects are being cancelled, while the opportunity of CCUS to help save these industries are being lost.

5. **Some new build projects are facing being paused because of lack of clear route to market.** It is becoming harder to convince boards to keep investing without clear site of when ROI will be realised.

6. **On average, project deployment dates are moving to the right.** Few developers give a cut-off date by which they need clarity but internal deadlines for continued devex spending is being considered.

If you haven't already, please:

- **Get in touch with me to give an update on your project – rebecca.bell@ccsassociation.org**
- **Complete the survey on devex at risk by following this link or scanning the QR code ->**

CCUS Delivery Plan: Planning & permitting progress

5 DCOs have been **granted** - **8** more have been **submitted**

3 Planning permissions have been **granted - 8** more have been **submitted**

8 Environmental permits granted – **6** more have been **submitted** (England & Wales)

The need for FIDs to be taken and the cluster programme timelines to be met has positively pushed ahead permitting timelines for projects participating in the process.

- However, some projects have experienced significant delays in their permit determination process.
- There have been cases where regulators' statutory / internal response timelines have been exceeded

A clear permitting framework for onshore carbon capture has **not** been published

- While it is relatively well understood, it remains complex with multiple permits from multiple regulators and statutory consultees required.

Guidance has been published on:

- Emerging techniques for post-combustion carbon capture here.
- Monitoring stack emissions from carbon capture plants with solvent-based abatement
- Methodology for the scientific derivation of Environmental Assessment Levels (EALs)
- Emerging techniques for hydrogen production with carbon capture.

The CCSA is witnessing improved and closer regulator-industry engagement, however our ask of government remains that they **accelerate and streamline permitting and consenting.**

Consultations

Organisation	Recently completed consultations (x9)	Date
DESNZ	Revisions to National Policy Statements	29 May
ESNZ Committee	National Planning for Energy Infrastructure	12 May
DESNZ	Community Benefits and Shared Ownership Working Paper	16 Jul
DEFRA	Biodiversity net gain for nationally significant infrastructure projects	24 Jul
HSE	Regulatory proposals for CCUS and offshore hydrogen production	13 Aug
NSTA	Consultation on proposals to introduce new and amended NSTA fees	12 Aug
DESNZ	Hydrogen economic regulatory framework	09 Sep

Organisation	Open consultations (x1)	Date
DEFRA	Modernising environmental permitting for industry	21 Oct
MHCLG	Streamlining infrastructure planning	27 Oct
DESNZ	CCUS Future Network Strategy	31 Oct
DESNZ	Evolution of economic regulation for CO2 Storage	31 Oct

Organisation	Overdue or expected consultations (x2)	Date
DESNZ	Non-Pipeline Transport	Nov
DESNZ	Third Party Access Regulations	Oct

MHCLG Consultation on Streamlining Infrastructure Planning

This consultation seeks views on changes to guidance, services operated by the public sector, and secondary legislation under the Planning Act 2008 to streamline the infrastructure planning process for NSIPs

1. New guidance about consultation and engagement following removal of statutory pre-application consultation requirements through the PIB.
2. Guidance and secondary legislation to support notification and publicity.
3. Guidance to support the acceptance stage for applications.
4. The use of Initial Assessments of Principal Issues (IAPI) to focus examinations.
5. Guidance for public bodies about their role in examinations.
6. Changes to secondary legislation related to the examination of applications including compulsory acquisition.
7. Reforms and improvements to pre-application services provided by the Planning Inspectorate, and the fast-track process.
8. Supporting pre-application services through effective resourcing of statutory bodies.

How to foster well developed applications?

How to improve the efficiency with which applications are examined?

How to improve the services provided during the NSIP process?


GOV.UK

Home > Housing, local and community > Planning and building

Open consultation

Consultation on streamlining infrastructure planning

From: Ministry of Housing, Communities and Local Government

Published 1 September 2025

Last updated 24 September 2025 — See all updates

Get emails about this page

Applies to England and Wales

The consultation is open until 27 October.

The CCSA are developing a high-level letter response, with targeted member feedback (where this is offered).

EALs

- Additional evidence received on AMP → this substance is being revisited by the EA.
- EAL consultation response has been published here.
- EA considering work on additional substances to which CCSA submitted further feedback – further info will be shared when available.
- EA published EAL derivation methodology.
    - Teach-in session for CCSA members took place on 11th September.

Cumulative Impacts

- Dedicated workshops to take place in **November** and **February** – calendar placeholders will be circulated shortly.
- To produce an industry **position paper** outlining options and recommendations to regulators.
- Using Teesside as a case study.
    - Please submit your interest to participate in this workstream to Despoina.Tsimprikidou@ccsassociation.org

Water Updates

Nicola Smith, SSE

CCSA

National Framework for Water Resources 2025: Water for growth, nature and a resilient future

CCSA Planning and Permitting Working group 25 September 2025

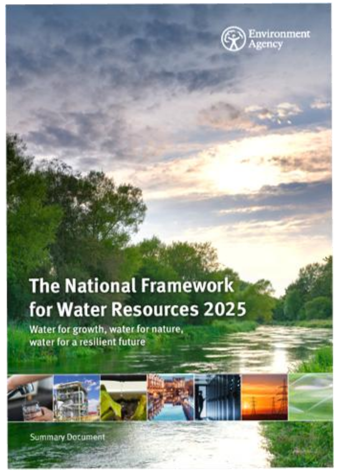
Nicola Smith Head of Environment SSE Thermal

National Framework for Water Resources 2025: water for growth, nature and a resilient future –

Aims of the National Framework

Action required from government, regulators, regional groups, water companies, abstractor groups and water users across all sectors

- Without action:
  - 5 billion litres/day shortfall for PWS by 2055
  - 1 billion litres/day shortfall for non-PWS by 2055, including water for energy security and agriculture
- Growing pressure on water resources:
  - threat to water supply to homes
  - restricts economic growth
  - damage resilience for energy supplies
  - limit food production
  - harm the environment
- 60% of deficit to be addressed through demand management and leakage reduction



National and Regional Water Deficits

Water Resources West

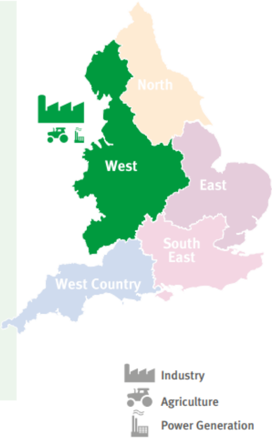
(The map shows the full area of WRW including parts of Wales. The values also include Welsh zones within the boundary, but the headline figures in the Framework do not)

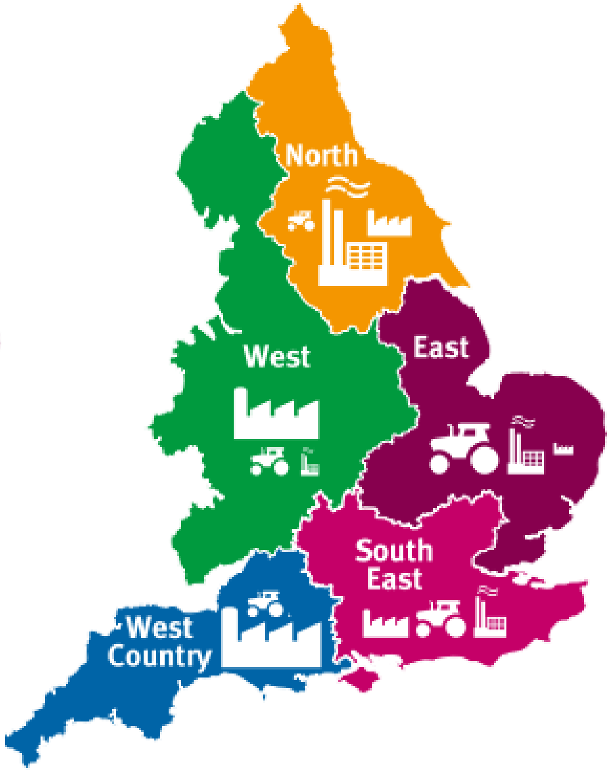
Additional public water supply needs between 2030 and 2055: 1073 Ml/d including

- Drought resilience: **62 Ml/d**
- Population change: **232 Ml/d**
- Environmental improvement: **572 Ml/d**
- Climate Change: **84 Ml/d**

Estimated total demand from other users: 416 Ml/d

- **52%** industry (food and drink, metal production, chemicals)
- **28%** agriculture (spray irrigation)
- **13%** power generation





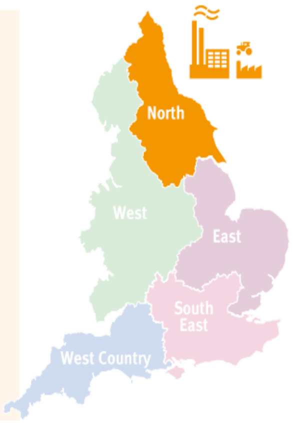
Water Resources North

Additional public water supply needs between 2030 and 2055: 345 Ml/d including

- Drought resilience: **70 Ml/d**
- Population change: **99 Ml/d**
- Environmental improvement: **109 Ml/d**
- Climate Change: **60 Ml/d**

Estimated total demand from other users: 222 Ml/d

- **27%** industry (food and drink, chemicals, mineral products)
- **20%** agriculture (spray irrigation)
- **51%** power generation



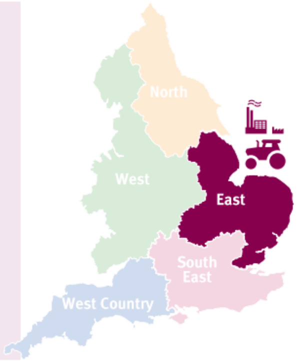
Water Resources East

Additional public water supply needs between 2030 and 2055: 679 Ml/d including

- Drought resilience: **114 Ml/d**
- Population change: **165 Ml/d**
- Environmental improvement: **415 Ml/d**
- Climate Change: **26 Ml/d**

Estimated total demand from other users: 515 Ml/d

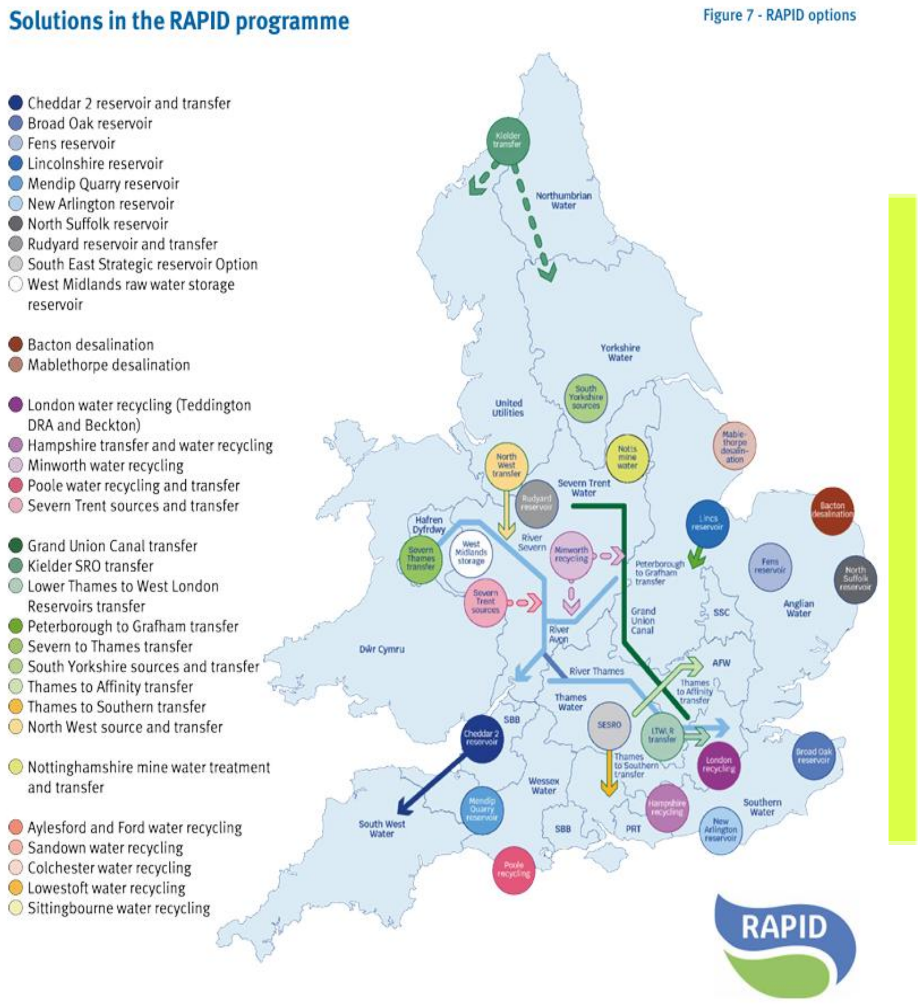
- **12%** industry (food and drink, chemicals, mineral products)
- **51%** agriculture (spray irrigation)
- **27%** power generation



sse Thermal

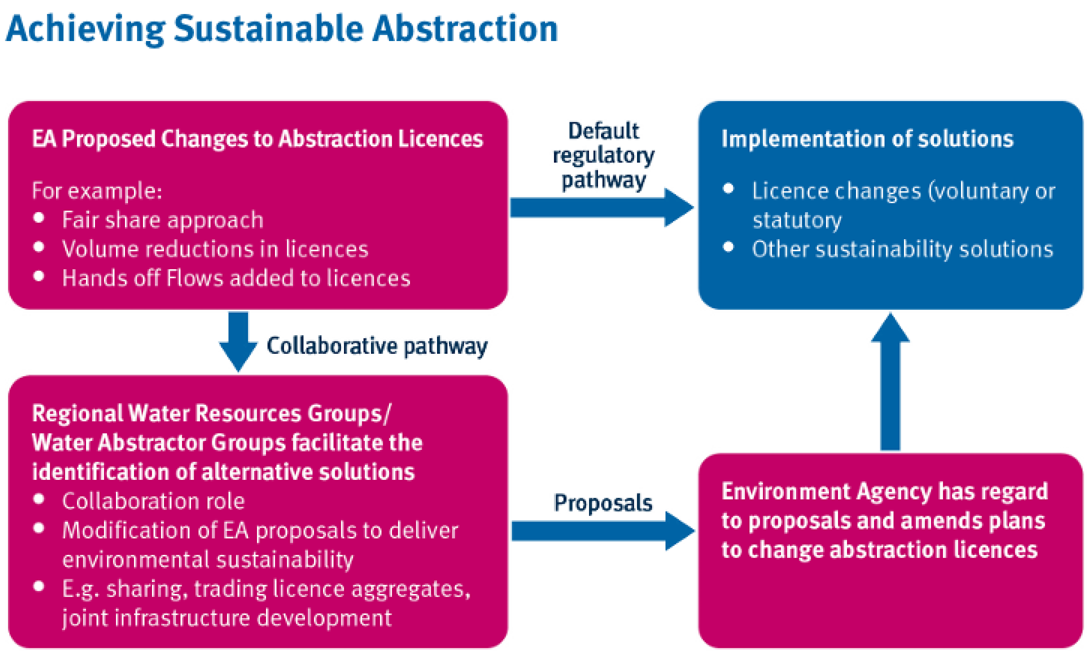
RAPID and Strategic Resource Options (SROs)

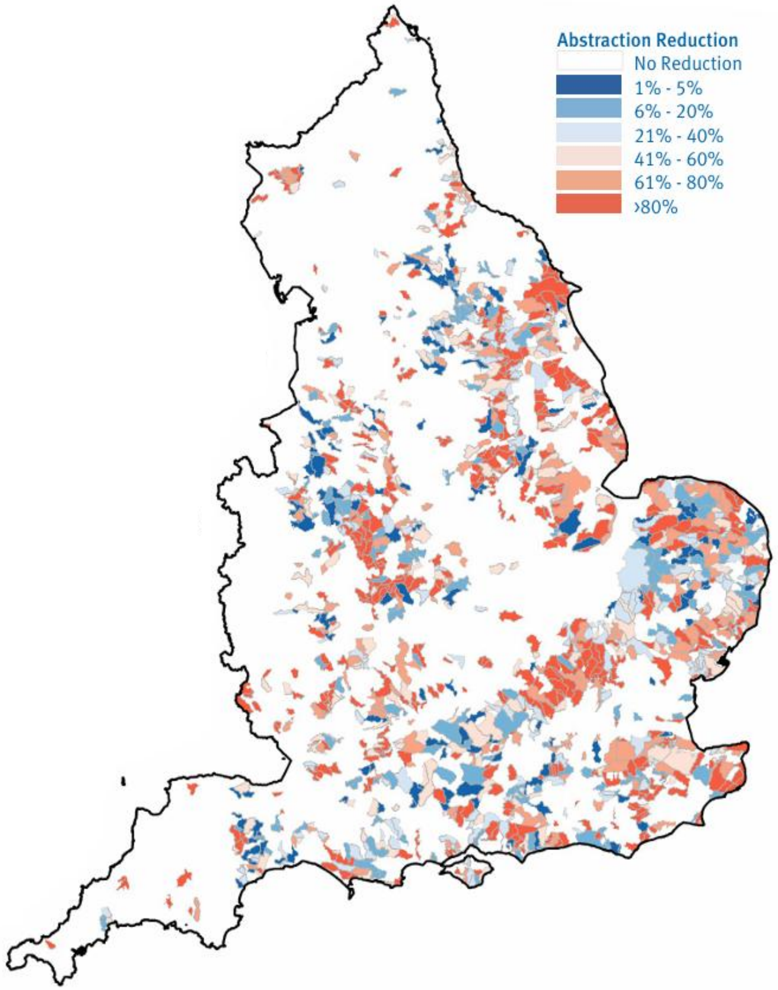
- Range of water resource options needed
- RAPID (Regulators' Alliance for Progressing Infrastructure Development) gated process for development of Strategic Resource Options > 2800 Ml/d being assessed
- "Needs to be greater join-up of options between sectors of use, particularly the water industry and the energy sector"
- Demand management needed before SROs come online



National Framework for Water Resources 2025:

Achieving Sustainable Abstraction





Section 7 :Taking Action on Water for Energy

The report recognises that water is vital for use in the production of energy, and energy is vital to support growth and economic security.
Expect to see demand for low carbon energy generation increase significantly from all sectors over the coming decades with an associated increased demand for water.

Work carried out for the Environment Agency estimates that the water needs for Carbon Capture and Storage and hydrogen production alone will amount to 767 Ml/d by 2050

Engagement with the sector has demonstrated that there is a need for a better understanding of where water is available so that it is not a barrier to progression.

Recommendations for the Energy sector :

- continue to engage with regional water resources planning groups and water companies on the sector’s water needs
- identify and evaluate suitable options to meet future water demand, e.g. recycling, desalination
- where relevant, develop joint proposals for additional resources in conjunction with other sectors e.g. build green hydrogen near WatCo desalination plant, co-fund plant & share water
- improve its long-term planning for expected future water needs
- take account of water needs & availability in the design and siting of plants
- continue to improve its water efficiency in production methods

Environment Agency Enabling collaborative planning Project

The project was designed to identify existing opportunities and future potential routes to join up planning to meet the water needs of the energy sector, and to provide realistic options and recommendations of how to overcome these barriers

Policy and Regulation barriers

Lack of best value planning framework for water and energy collectively as this has been limited to the appraisal of public water supply deficits and there is no equivalent planning framework that currently interfaces with the regional or water company water resources planning process.

Uncertainty in future abstraction licence availability and allocation mechanism due to constraints in water availability to comply with environmental objectives and legislation.

Lack of clear role definitions and remits in government and regulators which can lead to delays, indecision and uncertainty. The energy sector and water sector, in the round, are unclear as to who should be leading on this issue.

Lack of incentive to engage on water availability before submission on energy planning application stage and competition law restricting the ability for the energy sector to share proposals before they are in the public domain increase the difficulty in planning for water resource needs.

Highly dynamic, evolving new energy technology areas with funding and water use uncertainty meaning that potential water needs are uncertain.

Financial barriers

Competition prohibiting transparency of energy sector plans disincentivises energy companies from sharing potential site or regional energy development locations and limits the development of spatially specific forecasts of future energy water use.

Organisational barriers

Depth of cross sector engagement and shared understanding (data and communication) resulting in a lack of engagement and a shared understanding of key issues.

Dynamic and variable nature of the energy sector resulting in piecemeal engagement and further challenges in moving from a centralised to decentralised system..

•Dynamic and variable nature of the energy sector resulting in piecemeal engagement and further challenges in moving from a centralised to decentralised system

Technical barriers

Competing strategic water demands to reconcile which could become a more significant issue over time as demands for water increase.

Lack of suitable locational or catchment level forecasts for energy production which does not provide the sufficient detail needed to inform water planning at a spatial scale.

Lack of visibility of water company constraints and potential costs (options) to supply water resulting in a lack of spatial steers early in the planning process.

Independent Water Commission Report

Final Report published 21 July 25

Sir Jon Cunliffe

Cunliffe Report

Key Recommendations (88 in Total)

1. Strategic Direction
Introduce a National Water Strategy for England and Wales.
Replace fragmented guidance with a cross-sectoral, long-term framework.
Establish a Ministerial Statement of Water Industry Priorities (MSWIP).

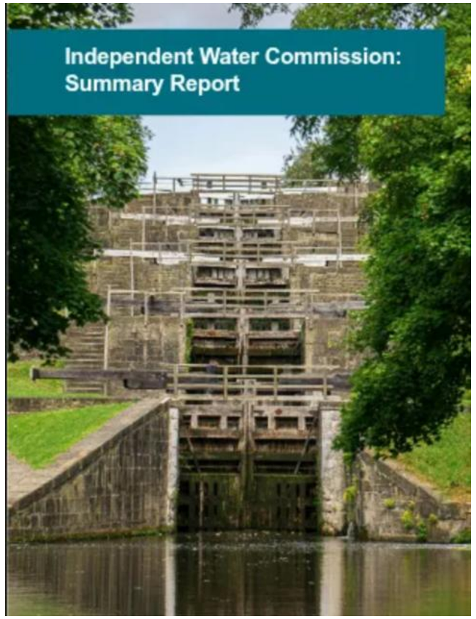
2. Planning Reform
Create regional systems planners in England and a national planner in Wales.
Consolidate 9 existing water company plans into 2 core frameworks: Water Environment and Water Supply.
Adopt a 5/10/25-year investment model to replace rigid 5-year delivery cycles.

3. Legislative Reform
Review and rationalise over 100 pieces of water legislation.
Update the Water Framework Directive (WFD) and Urban Wastewater Treatment Regulations (UWWTR).
Introduce a new statutory target for water body health and integrate public health outcomes.

5. Infrastructure & Resilience
Develop statutory resilience standards for infrastructure and supply chains.
Improve asset mapping, delivery assurance, and security legislation.
Expand Direct Procurement for Customers (DPC) and streamline planning processes.

6. Governance & Ownership
Strengthen regulatory powers over ownership and governance.
Introduce a senior accountability regime and public benefit clauses in licenses.
Improve financial resilience and investor confidence.

7. Innovation & Technology
Introduce regulatory sandboxes and review innovation funding mechanisms.
Encourage collaboration with academia and industry.
Disseminate innovation learnings across the sector.



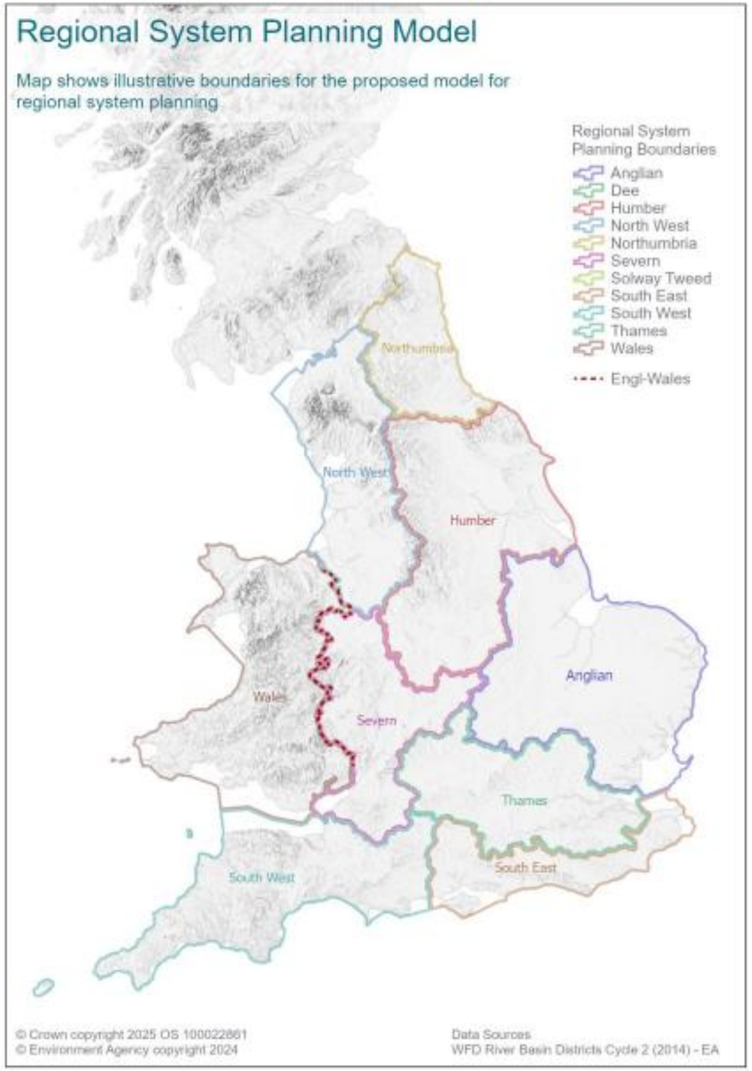
Proposed Regional System Planning Model

Recommendation 3: A comprehensive systems planning framework should be introduced for England and Wales, with responsibility for integrated and holistic water system planning. In England, the systems planners should be regional – or 'regional water authorities'. In Wales, the systems planner should be a national authority.

This recommendation outlines the systems planners':

- functions
- geographic scale
- responsibilities for convening and consultation
- levers to drive action by other sectors
- national coordination arrangements
- composition – for instance, their chairs, strategic boards
- organisational independence

Figure 5 - Proposed Regional Systems Planning Illustrative Boundaries



Source: Defra Analysis produced for Commission[175]

Links

National Framework for Water Resources 2025: water for growth, nature and a resilient future - GOV.UK

Summary NFWR 2025, including asks for energy sector

Environment Agency Water Hub | Engage Environment Agency

Environmental Destination - Get involved! | Engage Environment Agency
Environmental Destination Technical Report
Catchment Summaries for Environmental Destination

Modelled Abstraction Reductions - National Framework for Water Resources 2025
link to download spreadsheet

Independent Water Commission Final Report

Independent Water Commission: review of the water sector - GOV.UK

Presentation: Environmental Capacity in Industrial Clusters

Tom Glyn-Jones & Mark Ellis-Jones,
Environment Agency

CCSA

Modernising Environmental Permitting Consultation

DEFRA

All

CCSA

Department
for Environment
Food & Rural Affairs

Modernising the environmental permitting framework for industry

Defra Industrial Emissions Team
September 2025

Work so far

We have identified a number of areas to develop permitting reform proposals:

- **Enabling innovation and encouraging new technologies and techniques**
- **Agile standards – rapid, predictable and integrated standard setting**
- **Delivering proportionate regulation and coherence in the framework**
- **Regulator effectiveness and efficiency**
- **A transparent framework**

Enabling innovation & encouraging new technologies and techniques

Key relevant proposals include:

- 'Regulatory sandboxes' – a more streamlined process for approving time-limited R&D trials
- Commercial confidentiality – reviewing requirements around public disclosure, particularly for R&D trials, ensuring transparency while supporting regulation of emerging NZ technologies
- Guidance on Emerging Techniques – propose formalising the existing effective system for setting emerging technology standards to improve accountability and delivery of government aims

Agile standards – rapid, predictable and integrated standard setting

Key relevant proposals include:

- A more dynamic Best Available Techniques (BAT) system – placing a duty on the EA to set standards, within a clear framework and appropriate oversight, to enable prompt standard setting for small industry
- Integrated consideration of NZ and Circular Economy priorities: eg balancing trade-offs in standard setting to ensure best overall environmental outcome, explore use of horizontal BAT and EU's AEPL changes in IED 2.0

Proportionate regulation & coherence in the system

Key relevant proposals include:

- Ensuring permitting covers carbon capture for utilisation, direct air carbon capture and carbon capture for stand-alone medium combustion plant
- Flexible tiers of regulation – to allow regulators to tailor regulation to risk for emerging technologies
- Adding non-waste anaerobic digestion into permitting

Improving regulator effectiveness and efficiency

Key relevant proposals include:

- Industrial clusters – exploring the role of permitting in addressing environmental headroom issues at industrial clusters
- Giving regulators the flexibility to set permit conditions (e.g. ELVs) based on site-specific factors
- Improve interactions with other regimes and policies, focusing on reducing duplication between planning and permitting

A transparent system

Key relevant proposals include:

- Narrative on the importance of transparency, public acceptance, ensuring people know about pollution from sites in their area
- UK PRTR updates - adding new pollutants to the register e.g. PFAS and PM10 and amending reporting thresholds for pollutants to better reflect emissions.

Next steps

- Continued engagement – please reach out for more detailed discussions.

- Consultation closes on 21 October.

- Government response in early 2026

Views and suggestions

CCSA Member Positioning: EPR Reform

This consultation seeks views on priority areas where the EPR framework could be improved through reform to support a modernised framework for industry and the energy sector.

1. **Commercial Confidentiality**: alternative approaches to create flexibility (e.g. R&D trials)
2. **BAT/GET Guidance:** to provide a more agile, timely and proportionate means of putting in place initial standards for emerging technologies such as CCUS – How does a forward-looking dynamic system look like?
3. **Streamlining permitting & planning:** alternative approaches to provide assurance in the permitting process, based on outline planning permission process & alignment with realities of net zero industrial clusters.
4. **Regulatory gaps:** to capture CCUS applications that are not yet included in EPR regulations such as DAC and CCU.

3 Oct: CCSA draft response shared with members

15 Oct: Member input deadline

21 Oct: CCSA Submission

Wider narrative and general views/reactions?

International solvent confidentiality examples?

Impacts of proposals on current and future deployment and permitting timelines?

Open until 21 October.

CCSA will develop a one draft response, with targeted member feedback.

AOB & Conclusions

- Review actions arising from the meeting.
- Next Meeting: **1 December 2025**
- AOB