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Resources Wales

JNCC Reference: OIA-11461

NRW Reference: CML2365

Date: 15 April 2026 Natural

By email: stephen.treby@naturalresourceswales.gov.uk

Dear Stephen,

HyNet Carbon Dioxide Transportation and Storage Project – Liverpool Bay – Revised Combined Vessel Management Plan and Navigation and Safety Plan

Thank you for consulting JNCC regarding the revised combined vessel management plan and navigation and safety plan which we received on 24 March 2026.

The advice contained within this minute is provided by JNCC as part of our statutory advisory role to the UK Government and devolved administrations on issues relating to nature conservation in UK offshore waters (beyond the territorial limit).

Ornithology

We thank the applicant for clarifying works under Marine Licence Activity 2 – Pipeline spool laying and protection, and Marine Licence Activity 4 - Installation of the New Douglas Carbon Capture and Storage (CCS) Platform and connecting to/repurposing existing pipelines, which we previously queried.

We note that in answer to query number 11 in the “Technical Note: CML2365 Conditions 3.27 & 3.29 Responses to regulatory queries to discharge conditions” it is stated that the indicative schedule presented in the Vessel Management Plan (VMP) reflects a planning envelope only, and that pipeline spool installation activities will be scheduled outside the restricted seasonal period as per the conditions of Marine Licence CML2365. However, the detailed plan in Section 4.4. ACTIVITY 2 – PIPELINE SPOOL LAYING AND PROTECTION of the revised Vessel Management Plan, still shows installation activities occurring inside the restricted seasonal period. There is no mention of the seasonal restriction within the VMP. It would still appear that there is a conflict between the VMP and the condition of Marine Licence CML2365 regarding a seasonal restriction on pipeline installation, and we recommend the VMP is amended accordingly.

Applicant Response:

The Applicant acknowledges JNCC's comment regarding the apparent inconsistency between the indicative programme presented in **Section 4.4 – Activity 2: Pipeline Spool Laying and Protection** and the seasonal restriction requirements of Marine Licence CML2365.

The Vessel Management Plan (VMP) has been reviewed to ensure clarity and consistency with the requirements of the Marine Licence, in particular **Condition 3.18**, which restricts pipeline installation activities between **1 November and 31 March (inclusive)**.

Section 2.2 – Environmental Protection Measures explicitly states that all construction activities have been scheduled to ensure compliance with the seasonal restriction, and that no activities will be undertaken within the restricted period without prior approval.

The VMP confirms that all construction programmes presented within the document, including those in Section 4.4 and associated tables, are indicative only and form part of a planning envelope. These programmes have been developed to demonstrate how works could be undertaken, but do not represent fixed or committed construction dates.

The VMP further confirms that the programme does not supersede or modify the requirements of Marine Licence CML2365; and Condition 3.18 takes precedence over all indicative programme information, such that pipeline installation activities will be scheduled outside the restricted period unless otherwise agreed in writing with the Licensing Authority.

This clarification ensures that the VMP is fully aligned with Marine Licence CML2365 and that no pipeline installation activities will be undertaken within the restricted period unless agreed in writing with the Licensing Authority.

Please contact me with any questions regarding the above comments.

Yours sincerely,

Erin Sherratt

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The Joint Nature Conservation Committee (JNCC) is the statutory adviser to Government on UK and international nature conservation, on behalf of the Council for Nature Conservation and the Countryside, Natural Resources Wales, Natural England and NatureScot. Its work contributes to maintaining and enriching biological diversity, conserving geological features and sustaining natural systems