



Level 5,
10 Dominion Street
London EC2M 2EF
Tel: 020 7417 5200
Fax: 020 7417 5222
Email:
info@corygroup.co.uk
www.corygroup.co.uk

Geoff Underwood
Examining Authority
National Infrastructure Planning
Temple Quay House
2 The Square
Bristol
BS1 6PN

22 November 2024

Dear Mr Underwood,

EN010128 CORY DECARBONISATION PROJECT – NOTIFICATION OF INTENTION TO SUBMIT A CHANGE APPLICATION

I write to update you on matters pertinent to the preparation for the Examination of the Cory Decarbonisation Project ('the Proposed Scheme') and to notify you of the Applicant's intention to submit a Change Application in relation to a series of design refinements to the Proposed Scheme.

This letter includes the information required by Step 1 of the PINS Advice Page ('PINS AP') *Changes to an application after it has been accepted for examination*.

Change Application Notification

The Proposed Scheme is a carbon capture scheme, a technology which is explicitly supported by the Energy National Policy Statements (NPS) and identified as critical national priority infrastructure. Section 3.5 of NPS EN-1 sets out the need for carbon capture infrastructure; in particular, paragraph 3.5.7 refers to the Government's investor and supply chain roadmaps to ensuring a carbon capture sector that is investible, cost effective and focused on delivery.

In that context, the Applicant is continuing to undertake design development to ensure that the Proposed Scheme has the flexibility to be investible, cost effect and delivery. This design development has identified a series of refinements that will enable the optimisation of the operation of the Proposed Scheme through allowing for greater flexibility in the location and parameters of some elements of the Proposed Scheme. One of those changes (described at the time as relating to 'cooling') was referred to at the Preliminary Meeting by the Applicant. However, following further design work being undertaken by the Applicant since then, further amendments have been identified.

The Applicant has also noted the contents of the Rule 8 Letter, and the ExA's view that further consideration needs to be given to whether or not the removal of the Great Breach Pumping Station from the Order Limits should go through the full 'Change' process or not.



As such, this Change Notification been produced in relation to these design refinements so that all design refinements can be considered as package of changes.

Description of Changes

The list below outlines which elements of the Proposed Scheme which require amendment and the justification for these.

From the outset, the Applicant can confirm that none of these changes involves any additions to the Order limits and so the Infrastructure Planning (Compulsory Acquisition) Regulations 2010 do not apply.

Increased Flexibility

The Applicant is seeking to update the **Draft DCO (AS-056)** to facilitate an approach that would allow for flexibility and efficiency of the Proposed Scheme as identified by the ongoing design development.

- Work Number 1A – Design development has identified that the cooling system for the Proposed Scheme may be able to be optimised through additionally providing for the use of electrically driven fans passing air over finned tubes to cool fluid being used as part of the carbon capture process. These finned tubes would sit above the proposed process pipe and duct bridges and equipment components within the area of Work No. 1A. This change would involve the addition of “*air-cooled heat transfer systems*” at the end of Work Number 1A in Schedule 1 of the DCO. These fins would be within the overall height parameters set by the DCO.
- Work Number 1B – The Stack(s) may no longer be located directly on top of the Absorber Column(s), rather the Stack(s) could potentially be connected to, but forming a separate stack, or totally separate from, and directly adjacent to, the Absorber Column(s). This change would facilitate a ground-mounted gas-gas heat exchanger, which may enhance heat recovery and reduce the cooling load for the Carbon Capture Facility. The height of the Stack(s) will remain similar to the current proposals. The Applicant will retain the minimum 30m distance between the top of the Stack(s) and the Absorber Column(s) to avoid downwash of pollutants. However, it is acknowledged that greater clarity of this potential design approach needs to be accounted for in how the parameters are expressed in Schedule 16 of the DCO, and so this will form the basis of the Change Application.



Parameters

The following relate to the parameters set by the Applicant, specifically those set out in the **Indicative Elevations (AS-016)**, **Table 2-2** within **Chapter 2: Site and Proposed Scheme Description** of the **Environmental Statement (APP-051)** and **Schedule 16 of Draft DCO (AS-056)**:

- Potential maximum increase in the height of the 'Regenerator' – The Applicant now seeks the flexibility for the Solvent Regeneration System to be able to be constructed, such that the Regenerator Column sits above the Solvent Processing System, rather than separately, thereby increasing the overall height of the System to 60m (63m AOD)¹.
- Exclusion of the 'Great Breach Pumping Station' – This relates to the reduction of Order Limits to exclude the Great Breach Pumping Station (the removal of plot 1-122). The Applicant had originally included this plot to allow for the ability to undertake 'protective works' if these were required to the pumping station – although none had been assessed as necessary in the Environmental Statement, previous engagement with the Environment Agency indicated that they were concerned that this might be necessary in any event. However, given that the Environment Agency then in its Relevant Representation considered that they did not want the pumping station in the Order Limits, the plot was removed. As stated at ISH1, this change does not have any implications for any other aspect of the Application documentation save for the plans showing the Order Limits and the Book of Reference. In particular, the plot was a small plot and its removal has limited effect to the study areas of assessment (which post removal, would in any event become more precautionary).

Clarifications in Schedule 1

The following amendments to the **Draft DCO (AS-056)** comprise changes to the wording only. These revisions are intended to provide additional clarification as to what is able to be included within specific Work Numbers as defined by the **Works Plans (AS-053)**:

- Work Number 1A (i) – The word 'system' will be included. This is to all system processes which form part of flue gas pre-treatment are encapsulated in what is consented.
- Work Number 1A (v) – The word 'system' will be included. This is to capture all system processes which form part of solvent heat exchange are encapsulated in what is consented.
- Work Number 1C (iii) – The phrase 'and deoxidation' will be added after liquefaction unit(s). This is to capture all processes, including deoxidation

¹ Previously the maximum height of this component was 50m (53m) AOD.



which form part of the CO₂ conditioning system(s) (of which the liquefaction also forms part) .

- Work Number 1C – Addition of ‘chemical storage and distribution handling facilities’. This is in addition to the ‘chemical storage and distribution handling facilities’ which will be located in Work Number 1E(viii). A number of chemicals are required for operation of the Carbon Capture Facility, including for flue gas pre-treatment and CO₂ Processing Plant which are located in within Work Number 1.

Environmental Considerations

Within the Change Application, the Applicant will include an environmental analysis to consider if the proposed changes would affect the environmental assessments reported in **Chapter 5: Air Quality (APP-054)** to **Chapter 21: Cumulative Effects (APP-70)** of the **Environmental Statement (Volume 1)**, as amended, and the extent to which these would be different as a result of the proposed changes described above.

At this early stage, the Applicant considers that the only EIA topics likely to be of relevance for these proposed changes are Townscape and Visual, Air Quality and Noise and Vibration, and so the Change Application will focus on these topics, whilst confirming whether this initial view is correct.

However, it is also noted that the noise levels assumed in **Chapter 6: Noise and Vibration** of the **Environmental Statement (Volume 1) (APP-055)** will change as a result of these changes, and whilst the Applicant is considering whether any air quality modelling to account for the potential change to stack design is necessary (i.e. the stack potentially being off-set from the absorber column), the base parameters that informed the assessment in **Chapter 5: Air Quality** of the **Environmental Statement (Volume 1) (APP-054)** (i.e. that there is a 30m gap between the top of an Absorber Column(s) and Stack(s)) are remaining and so it is likely that there would be minimal differences to the modelling presented in the assessment. From a Townscape and Visual perspective, these changes all relate to flexibility within a new industrial facility that has already been assessed, as such it is also considered unlikely that any new likely significant effects would arise. However, this will be considered in the Change Application, which will include revised iteration of **Appendix 10-4: Photomontages** of the **Environmental Statement (Volume 3) (APP-104)** to account for the proposed change to the Absorber Column(s) and Stack(s), cooling system and the Regenerator parameters.

As such, at this stage is not considered that the proposed change is expected to result in changes to the overall likely significant effects as reported in the Environmental Statement. However, this will be confirmed in the Change Application.



Documents

The Applicant proposes that it would submit the following updated Application documentation as part of the Change Application submission

Document Number	Document Title	Examination Reference
1.4	Application Document Tracker	AS-050
2.5	Engineering Plans - Indicative Equipment Layout Plans	AS-054
2.10	Engineering Plans - Indicative Elevation Plans	APP-016
3.10	Updated Draft DCO (Schedules 1 and 16)	AS-056
4.3	Book of Reference	AS-058

Please note that the above documentation does not include updating the Land Plans or Works Plans to account for the Great Breach Pumping Station change, as such plans have already been submitted to the Examination.

Consultation and Programme

The Applicant believes the alterations proposed are minor changes that do not require consultation and would be able to be considered solely within the Examination processes. However, it understands that this is a matter for the ExA's discretion. As such, should the ExA deem consultation necessary, the Applicant proposes the following consultation programme and structure. This programme allows for minimal changes to the Examination timetable, allowing for the Change Application to be submitted by Deadline 3.

Submission by Deadline 3 would ensure that all matters raised by this Change Application could be discussed at the second round of hearings which are currently scheduled to take place in week commencing 10th February 2025.

In this context, the Applicant proposes the following programme for the consultation and consideration of the Change Application:

- Change Application notification submitted – 22nd November 2024.
- Procedural Decision by ExA – respectfully requested by 29th November 2024.
- Publication of advertisements and notices and arrival of letters. – Wednesday 11th December 2024. Consultation starts on 12th December 2023. The Applicant proposes that the notices are placed on site, in a local newspaper and sent to all section 56 parties for the Proposed Scheme. Those notices will point to information about the Changes on the Proposed Scheme website.



- Closure of consultation - 10th January 2025.
- Submission of Change Application at Deadline 3 – 17th January 2025.

The Applicant can confirm that, given the discussions at the Hearing, it has informed Munster Joinery/Landsul Limited of this proposed Change Notification and will be sending a copy of this Notification to them upon sending it to the ExA. It is understood from those discussions that the submission of this proposed Change Notification will not prevent the parties working together to develop the requested focussed SoCG for Deadline 3.

The Applicant hopes that this letter is helpful to the ExA in considering next steps. If the ExA or the case team have any question on any of the above, please do not hesitate to contact me or my project team.

Yours sincerely,



Richard Wilkinson
Project Director
Email: decarbonisation@corygroup.co.uk
Phone: 