



## Meeting note

<b>Project name</b>	Humber Low Carbon Pipelines
<b>File reference</b>	EN070006
<b>Status</b>	<b>Final</b>
<b>Author</b>	The Planning Inspectorate
<b>Date</b>	22 September 2021
<b>Meeting with</b>	National Grid Carbon (NGC)
<b>Venue</b>	Virtual
<b>Meeting objectives</b>	Project Update
<b>Circulation</b>	All attendees

### Summary of key points discussed and advice given

The Planning Inspectorate (the Inspectorate) advised that a note of the meeting would be taken and published on its website in accordance with section 51 of the Planning Act 2008 (the PA2008). Any advice given under section 51 would not constitute legal advice upon which applicants (or others) could rely.

### Project Update – Department for Business, Energy and Industrial Strategy (BEIS) Cluster Consultation and Other Emitters

The East Coast Cluster (the combined Humber and Teeside clusters) had met eligibility criteria for phase 1 completion.<sup>1</sup> The Government would identify at least two proposed clusters to receive funding for early development. The Applicant (NGC) aimed to maintain programme momentum in its current form. The selection of a transport storage element of carbon capture usage and storage (CCUS) (Track 1 Cluster as BEIS Cluster Sequencing Consultation) was expected by the end of October 2021.

The Applicant was engaging regularly with emitters in the area. It had registered as an Interested Party (IP) in the Keadby 3 Low Carbon Gas Power Station project Examination and would be supporting Drax Bioenergy with Carbon Capture and Storage project in its forthcoming statutory consultation. Discussions had begun with North Lincolnshire Green Energy Park regarding project interfaces and the need for a statement of common ground (SoCG).

### Proposed Development

The first round of non statutory consultation had begun. Route options had been further refined into two configurations. Option A tunnelled under the Humber Estuary and option B would utilise other pipeline infrastructure to the north of the Humber (avoiding tunnel crossings). Options appraisal work had been completed, with option A recommended and forming the basis of the non-statutory consultation and technical assessments.

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<sup>1</sup> On the 19 October 2021 BEIS announced that the East Coast Cluster had been successful and confirmed as a tack 1 cluster

## **Approach to consultation**

A second round of non-statutory consultation is proposed for early 2022. This would provide additional detail about the above ground infrastructure and allow for consideration of any refinements following the completion of the BEIS cluster sequencing process as it relates to emitters. Changes to expected potential emitters could require route changes, which would be made clear during the first round of non-statutory consultation. The second round it intended to allow for non-statutory engagement regarding any new receptors arising from any changes to the proposals resulting from the BEIS cluster sequencing outcome. The Applicant intended to submit its Environmental Impact Assessment (EIA) scoping request in early 2022 following the non statutory consultations, thereby allowing it to include more detail in its Scoping Report. Statutory consultation would then be undertaken after scoping with detailed proposals. The Inspectorate acknowledged the Applicant's programme, which would avoid any overlap between the non-statutory consultation and the Inspectorate's scoping consultation.

## **Non-statutory consultation details**

The Applicant would be providing an overview of the project ambition as well as information about some technical detail and the planned consultation process. This would cover the broader route corridors following initial optioneering. The consultation was planned to run virtually until 22 October 2021, with interactive features. Physical consultation events were planned (subject to government covid-19 guidance) for the subsequent rounds of consultation. The consultation strategy had been discussed with local planning authorities (LPAs) and the feedback so far was positive in terms of the levels of engagement and the overall strategy, which was publicly available on the consultation website. The consultation was being advertised in a variety of ways. Options were available for providing digital or non-digital feedback.

## **Surveys and EIA**

Contact had been initiated with approximately 2000 landowners along the possible route corridors and discussions were being held regarding voluntary land access for surveys. Should it be required, the Applicant would progress the use of s172 of the Housing and Planning Act 2016 rather than s53 of the Planning Act 2008 (PA2008) to gain access to land. Discussions were ongoing with Natural England (NE) - initial conversations had focused on breeding and wintering bird surveys and methodologies and the parties would go on to consider the broader suite of surveys to be completed in 2022. Initial bird surveys had commenced using the agreed methodology. High resolution aerial photography of route corridors had been completed, to inform targeted phase 1 surveys. Potential interactions between the Proposed Development and the European sites covering the Humber Estuary was noted, which the Applicant explained had formed a key point of discussion with NE and other stakeholders.

The Applicant was considering the potential impacts of the Proposed Development together with the offshore element of the wider development and looking at preparing an assessment of potential combined and cumulative impacts as part of the Environmental Statement (ES).

## **Anticipated programme**

The anticipated programme was as follows:

- Q1/Q2 2022 – 2<sup>nd</sup> non statutory consultation, EIA scoping & continued surveys, statutory consultation, Preliminary Environmental Information Report (PEIR).
- Q3/Q4 2022 – Assessments & land rights, EIA surveys, ES, application submission.
- 2023/2024 – Examination and decision.

The Inspectorate strongly encouraged the Applicant to avoid submitting the application after the end of November 2022 as the Christmas/New Year period could reduce capacity to respond to questions or request signposting to information.

**For the following agenda topics, the Inspectorate and Applicant were joined by representatives of the Northern Endurance Partnership (NEP) and Offshore Petroleum Regulator for Environment and Decommissioning (OPRED).**

### **Overview of the offshore components and the NEP**

The NEP would be the developer for the offshore components of the carbon dioxide (CO<sub>2</sub>) export pipelines and storage for the Teesside and Humber side CO<sub>2</sub> emitters. Phase 1 of the development would include two CO<sub>2</sub> export pipelines, one from Teesside approximately 145km in length and one from Humber approximately 85km in length, and a targeted saline aquifer store in the North Sea. Future expansion would allow up to 27 million tonnes per annum of CO<sub>2</sub> storage in the Endurance store and additional stores in its proximity. The phase 1 Endurance store would have a total of five injector wells (one being spare) and one monitoring well, providing for up to 4 million tonnes per annum of CO<sub>2</sub> storage. The configuration of the offshore pipeline route was still to be finalised.

The Inspectorate queried the levels of certainty regarding the deliverability of the Endurance store, due to its impact on the feasibility of the proposed Humber Low Carbon Pipelines project. The response was that evidence would be available through the EIA submission for the offshore components (to be made to OPRED), and the process for the award of a store licence by the Oil and Gas Authority (OGA), which would involve submission of a store development plan. The OGA would only grant consent for the store licence application if and when it is satisfied with the evidence and only if OPRED has granted consent having reached a conclusion on the significant effects of the project on the environment.

NEP advised appraisal activity for the White Rose project and the Yorkshire and Humber CCS Cross Country Pipeline characterisation work was informing their approach, and seismic survey data had been acquired. The approach would be driven by the requirements of the OGA.

Informal scoping for the EIA was underway, with stakeholder contact, impact assessments and supporting studies planned over Q3/Q4 2021.

The ES would be submitted by NEP to OPRED towards the end of Q1/early Q2 2022. Final investment decisions are expected in Q2 2023.

Substantial survey activities were underway regarding potential pipeline routing, to establish any sections that require trenching or burying. The NEP stated that the ES assessments would be based on a reasonable worst case scenario.

OPRED provided an overview of its role within the wider CCS team in BEIS, assessing environmental impacts of proposed offshore developments, throughout the full stages of their life cycle. This includes making appropriate assessments as Competent Authority for the purposes of the Habitats Regulations.

### **Designated ecological sites and other developments**

Pipeline routing was still to be finalised, and multiple landfall options were under consideration. These could fall within or be located in proximity to a number of designated ecological sites.

It was explained that the Endurance store falls within the Southern North Sea Special Area of Conservation.

Key fisheries were also sited along both pipeline routings and the Endurance store area, and existing oil and gas infrastructure in the offshore area would also need to be considered. The NEP explained that a large number of potential CCS sites exist in the North Sea, using naturally occurring saline aquifers not developed for oil and gas. Some depleted oil and gas sites also offered potential carbon storage.

### **Overview of Endurance Store**

The structure of the Endurance store was described, covering an area of 25km x 8km and 430 metres in height, making it the largest potential CCS store in UK waters with a capacity of up to 450 million tonnes of CO<sub>2</sub> over its 25 year operational life. The trapping machine and integrity of the seal were integral elements, using layers of bunter sandstone, seal rocks and porous spaces between sand grains filled with saltwater, allowing the CO<sub>2</sub> to move through and be stored due to its density.

During phase 1, the NEP stated that the production of brine (formation water) was not anticipated (although there may be potential for formation water displacement from an outcrop of the Bunter sandstone formation, ~20km south east of the Endurance store area); it was acknowledged that the potential leakage of brine would need to be considered in EIA submissions for later phases. Work was ongoing to understand the likely impacts and discussions were ongoing with OPRED, particularly regarding the availability/timing of borehole drill data relating to formation water displacement, and the implications for the submission date of the ES. The NEP stated that a reasonable worst case assessment would be provided in the ES.

The OGA would award a store permit on the basis of an approved store development plan. A key component of this would be the Measuring, Monitoring and Verification plan (MMV) for monitoring CO<sub>2</sub> and environmental outputs, using a number of tools, including seismic and environmental surveys.

### **Terrestrial and Marine permitting alignment**

By the time of the Applicant's planned DCO application submission date at the end of 2022, a decision by OPRED on the offshore element was expected. The Applicant

expected offshore matters to be progressed to give assurances regarding the viability of the full chain components.

The Inspectorate advised the Applicant to consider using a Grampian condition or similar mechanism in the draft DCO to restrict the Humber Low Carbon project from being delivered prior to consent/ implementation of the consent for the Endurance store. The Inspectorate acknowledged uncertainties regarding linked permits and consents for projects in general. It advised some level of alignment in the consenting processes would be useful to improve availability of information during Examination. Emerging policy would need to be monitored.

The Inspectorate also advised NEP to consider registration as an Interested Party for the Humber Low Carbon Pipelines and Net Zero Teesside projects, to allow the Examining Authority to direct questions to NEP as required.