

# CAROLYN THOMAS

## MS FOR NORTH WALES / AS DROS GOGLEDD CYMRU

Planning Inspectorate (by email only)

5<sup>th</sup> September 2023

Dear Planning Inspectorate,

Since 2021, I have represented the people of North Wales in the Senedd, Wales's National Parliament. I write to raise serious concerns both on behalf of myself and residents about the proposed Liverpool Bay CCS project and associated infrastructure.

I believe the project will serve to further entrench fossil fuel reliance and poses significant risk to the safety of residents living near the pipeline. I am very concerned that the possible risks of this project have not been properly considered and mitigated. As the former Deputy Leader of Flintshire Council with experience of the portfolio for road maintenance, I also feel not enough consideration has been given to the impact this project will have on the local road network.

I have structured my representations into six sub-categories:

1. Undermining the goal of sustainability
2. The Wellbeing of Future Generations (Wales) Act 2015
3. Highway Infrastructure
4. Flood risk
5. Leakage risk and community safety
6. Economic impact

### **Undermining the goal of sustainability**

Fundamentally, carbon capture projects undermine the goal of sustainability and are simply a lifeline for the fossil fuel industry. It is a mere sticking plaster when the focus ought to be on achieving long term sustainability to curb the climate crisis.

The resigning head of UK Hydrogen and Fuel Cell Association, Chris Jackson, said in 2021 "I believe passionately that I would be betraying future generations by remaining silent on the fact that blue hydrogen is at best an expensive distraction, and at worst a lock-in for continued fossil fuel use that guarantees we will fail to meet our decarbonisation goals." Yet the UK has made huge public funding available for blue hydrogen and CCS, at the expense of investment in genuine renewables.

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In fact, peer reviewed research by [Howarth and Jacobsen from Stanford and Cornell Universities](#), found “the greenhouse gas footprint of blue hydrogen is more than 20% greater than burning natural gas or coal for heat”. How can the applicant argue the Liverpool Bay CCS is consistent with achieving net-zero when creating blue hydrogen is such a polluting process.

So far, no carbon collection scheme has collected as much carbon as promised. For instance, United States oil and gas giant Chevron has acknowledged its flagship carbon capture and storage project off Australia's north-west coast is [operating at just a third of its capacity](#) as problems bedevil the facility.

After billions of dollars in public and private investments over decades in the USA, there are no carbon capture success stories — only colossal failures. One of the largest was the [Petra Nova coal plant in Texas](#), once the poster child for CO<sub>2</sub> removal. But the plant consistently underperformed, before it finally closed for good last year.

Renewable energy and energy efficiency are reliable, cost-effective, and ready for widespread deployment. Given huge advances in production and storage, we could meet 100% of our energy needs with clean, renewable energy. The UK Government would be far better off investing the £20billion of taxpayer’s money in renewable technology which would guarantee a sustainable future, without the huge risks involved with CCS projects such as the one proposed for Liverpool Bay.

### **The Wellbeing of Future Generations (Wales) Act 2015**

In Wales we have a landmark piece of legislation that helps us all work together to improve our environment, our economy, our society and our culture. This is called the [Well-being of Future Generations Act](#).

The Act identifies seven core well-being goals all public bodies in Wales must achieve. One of these is ‘A Globally Responsible Wales’, defined as, “A nation which, when doing anything to improve the economic, social, environmental and cultural well-being of Wales, takes account of whether doing such a thing may make a positive contribution to global well-being.”

I strongly believe these proposals fails to comply with the ethos and objectives of the Wellbeing of Future Generations Act and in particular the aim of a Globally Responsible Wales. ENI, Liverpool Bay CCS Limited’s parent company is currently expanding its UK (North Sea) and global fossil fuel portfolios. Such investments directly contradict this goal.

Indeed, former Future Generations Commissioner [Sophie Howe urged public bodies to end investment in climate-wrecking fossil fuel companies](#), saying; ‘it is the poorest people, both here in Wales and globally, that are least responsible and yet most affected by climate change. We must divest from fossil fuels now to help support more vulnerable countries where people are already experiencing the front-line impacts of climate change.’

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This is in clear conflict with ENIs record globally, with the firm implicated in [human rights abuses and environmental damage in Mozambique](#), one of the poorest countries in the world.

In my opinion, the UK Government's pledge to invest £20billion of public money in carbon capture and storage projects including Liverpool Bay CCS is misplaced and fails to recognise the growing body of evidence that such schemes are hazardous to local populations and undermine global ambitions to phase out fossil fuel reliance.

### Highway Infrastructure

As the former cabinet member for Streetscene at Flintshire County Council I would like to raise concerns regarding the impact the Applicant's plans will have on highway infrastructure locally. Deterioration following a decade of austerity means the resilience of the road network is very poor.

The proposed pipe is thirty inches in diameter and additional clearance around the pipe will be required. Given the area is already congested with pipes and ducts, I believe there is limited capacity for such a large addition. There needs to be consultation with the NMWTRA & Scottish Power as there are plans regarding the deteriorating A494 Dee Bridge which will impact including moving of a pylon and undergrounding of cables at Queensferry. It has already been raised that there is underground congestion to do that work.

I do not believe proper consideration has been given to the impact on highways traffic during construction. Local residents will be severely impacted as the proposed pipe proposals route through many densely populated areas. In particular, the impact on access to local businesses, schools, hospitals and for blue light services is of serious concern.

### Flood risk

[Hynet themselves have accepted](#) that 'by 2050, it is likely that sea level rise may pose a flood risk to the DCO Proposed Development'. Flood prediction maps produced by Climate Central confirm this hypothesis. Given that the pipeline will be in use until 2065, what plans does the applicant have to properly maintain infrastructure that may be underwater in years to come as a result of sea level rises?

The pipeline and its construction could also impact on areas already at risk to flooding including Sealand, Broughton, Sandycroft and Mancot, predominantly caused by overdevelopment which has taken place for decades in the local area without any concurrent investment in drainage or sewerage infrastructure.

Properties in these areas have already seen significant flooding which is difficult to mitigate with increasing monsoon type rainfall. Given that the pipeline will interfere with 18 water courses in Flintshire, what assurances has the applicant given to residents who are already deeply concerned about flooding that works will not exacerbate the already existing threat?

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### Leakage risk & Community safety

There are currently just a handful of commercially working carbon capture schemes and all have problems. The main issue besides cost is leakages, whether from pipes or “natural” storage. Where leaks occur, they are easy to hide particularly under the seabed. Currently, gas leaks equate to 3% of UK gas emissions, highlighting the likelihood of such leakages.

Already, the increased CO<sub>2</sub> taken up in the oceans is having a major effect on animal life due to acidification which is on top of the global rise in sea-temperature. The proposed plans could worsen habitat loss and threaten marine biodiversity further.

According to the [Researchers for the Institute for Energy Economics and Financial Analysis](#) (IEEFA), trapped CO<sub>2</sub> will need monitoring for centuries to ensure it does not leak into the atmosphere – raising the risk of liability being handed over to the public, years after private interests have extracted their profits from the enterprise.

Despite this, ENI admitted in their [2023 AGM](#) that they would monitor the CO<sub>2</sub> reservoirs in Liverpool Bay for a mere 20 years. With such high levels of uncertainty surrounding the likelihood of leakages, the lack of any proper regulatory framework to ensure accountability should be of serious concern.

The fact that the [recent oil spill](#) that happened about 20 miles (33km) north of Rhyl, Denbighshire spilling 80,000 litres occurred under ENI's watch raises further questions. Why should this company be given further opportunity to cause environmental damage to our region?

The [UK Health and Safety Executive](#) when referring to Hynet said, ‘HSE accepts the current evidence base which indicates that CO<sub>2</sub>, as it will be processed, transported and stored as part of CCUS operations, presents major hazard potential’.

In 2020 this potential became reality when a pipe carrying CO<sub>2</sub> ruptured near the village of Satartia, Mississippi. Emergency personnel [evacuated about 200 residents](#) from there and the surrounding area, and 45 people sought medical attention. Given Hynet will pass through densely populated areas, the risk of serious harm is extremely high. How can the applicant be sure that such disasters will not occur in this instance?

### Economic impact

With regards to job creation in Flintshire as a result of the Hynet project, I would like to highlight the below extract from ENI's 2023 AGM Q&As (p.110).

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13. Increasingly, graduates do not want to work for companies whose portfolio remains dominated by oil and gas. Universities within the HyNet geographical footprint are beginning to ban fossil fuel companies from recruitment fairs (eg Wrexham Glyndwr in December 2022). How will ENI address the resultant skills shortages?

### Answer to the question

There are currently no particular shortages in the availability of personnel.

This answer extremely disappointing and provides no assure whatsoever that any skilled, well-paid, secure jobs will be forthcoming for members of local communities. Similarly, it also shows a total lack of willing to engage with and understand the concerns of local residents.

### Conclusion

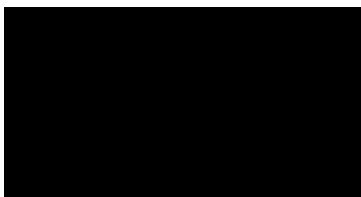
Overall, I strongly believe this project will fail to realise its intended objectives as an aid to reaching net-zero. No CCS project to date has achieved its promised storage rate. Public funding would be far better invested in genuinely sustainable renewable energy technology.

In my opinion, Hynet does not comply with the goals of the Wellbeing of Future Generations Act, and ENIs record on the global stage is at complete odds with the aspirations of a 'Globally Responsible Wales'. The planned works also pose a risk to local communities as the likelihood of leaks occurring is not fully known. There are also concerns that the pipe work could exacerbate existing flood risk for homes in Flintshire and cause damage to the county's highway network.

Far more work needs to be carried out alongside consultation with local residents prior to any works taking place. I hope the Planning Inspectorate will take into consideration the points raised in this representation.

If I can be of any further assistance, please do not hesitate to get in touch.

Sincerely,



Carolyn Thomas

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