

The Planning Inspectorate
Temple Quay House
Temple Quay
Bristol
BS1 6PN

8 January 2024

To The Planning Inspectorate

Relevant Representation: Viking CCS Pipeline

- 1.1 This representation is submitted by Air Products (BR) Limited (**Air Products**) in respect of the proposed Viking CCS Pipeline project (**Viking**). Air Products wishes to register as an interested party in the Examination.
- 1.2 Air Products is a world-leading industrial gases company that has been in operation for nearly 80 years, and more than 60 years in the UK and Ireland. It has over 1,000 UK and Ireland employees working across 35 production facilities, in addition to a number of hydrogen refuelling stations and hydrogen, nitrogen and oxygen plants. The company develops, engineers, builds, owns and operates some of the world's largest industrial gas projects.
- 1.3 Air Products is also currently working with Associated British Ports to promote the Immingham Green Energy Terminal application for development consent, which was Accepted for Examination on 19 October 2023. Air Products will be the first user of the proposed new terminal with the proposed landside development of a hydrogen production facility in Immingham.
- 1.4 Air Products supports, in principle, the development of Viking and welcomes any contribution it would make towards the decarbonisation of UK industrial activities and the UK meeting its net zero targets, subject to its concerns relating to its existing assets in the area (set out below) being fully addressed.

2 AIR PRODUCTS' ASSETS

- 2.1 Air Products operates in and around the Stallingborough area and has existing assets which currently serve two oil refineries which are likely to be affected by Viking. In particular:
 - 2.1.1 An oxygen pipeline which runs as shown coloured red on the plan at Annex 1 and in parts buried where shown hatched. Air Products operates and maintains this pipeline pursuant to a deed easement granted by Phillips 66 Limited who owns the full length;

- 2.1.2 A nitrogen pipeline which runs as shown coloured green and red on the plan at Annex 2 and in parts buried where shown hatched. Air Products operates and maintains this pipeline under a licence granted by Phillips 66 Limited and Humber Oil Terminals (Trustees) Limited who together own the full length;
- 2.2 Viking proposes a new onshore pipeline approximately 55.5km in length running from the proposed new Immingham Facility and ending at the proposed new Theddlethorpe Facility where it will then connect to an offshore system, as more particularly set out in the Environmental Statement Volume II, Chapter 3 (Description of the Proposed Development) (document reference EN070008/APP/6.2.3).
- 2.3 The Book of Reference (document reference EN070008/APP/3.3) has identified Air Products as having a category 2 interest in part of the order land over which compulsory powers of acquisition of land and subsurface, acquisition of rights and temporary use of land, and powers to temporarily possess and use land are sought. The draft development consent order (**DCO**) provides for the extinguishment, suspension and interference of private rights. Air Products is also identified as having a category 3 interest in respect of a number of plots within the order land.

3 INTERFERENCE WITH AIR PRODUCTS' ASSETS

- 3.1 Air Products objects to the proposed powers of compulsory acquisition over land in which it has an interest.
- 3.2 To date there has been limited communication with the Applicant in relation to their proposals, the powers sought over the land in which Air Products has an interest, and what kind of interference is proposed by Viking. Air Products would welcome further opportunity to discuss with the Applicant to better understand its proposals and their potential impact on Air Products' operations.

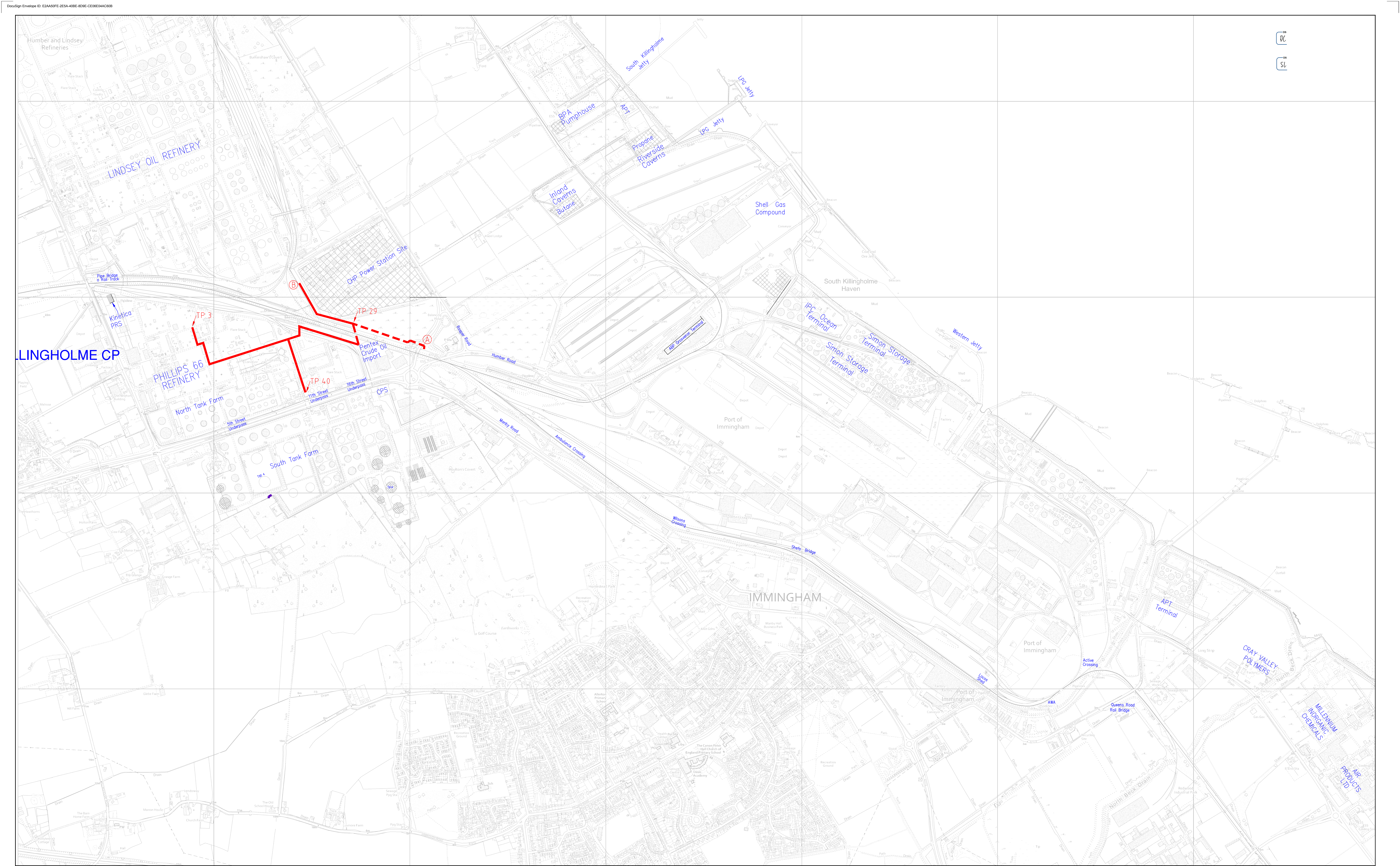
4 PROTECTION OF AIR PRODUCTS' ASSETS

- 4.1 Air Products would like to agree with the Applicant the inclusion of Protective Provisions in the draft DCO for the protection of Air Products' existing infrastructure, and/or an asset protection agreement as relevant.
- 5 Air Products reserves the right to make further representations as part of the Examination process and would welcome further opportunity to discuss with the Applicant with a view to reaching agreement on these matters.

Yours faithfully,

Air Products (BR) Limited

Annex 1



DC
SL

LINGHOLME CP

KEY:
 ——— 8" OXYGEN LINE
 - - - UNDERGROUND PIPING
 TP - TIE IN POINT

Notes

Reference Drawings

Equipment On This Drawing

Rev.	Date	Description	Drn	Chk.	App'd.
2	27/05/22	ISSUED FOR INFORMATION	FA	MA	MA
1	05/05/22	ISSUED FOR INFORMATION	FA	MA	MA
0	11/02/22	ISSUED FOR CLIENT COMMENT - REVIEW	FA	MA	MA

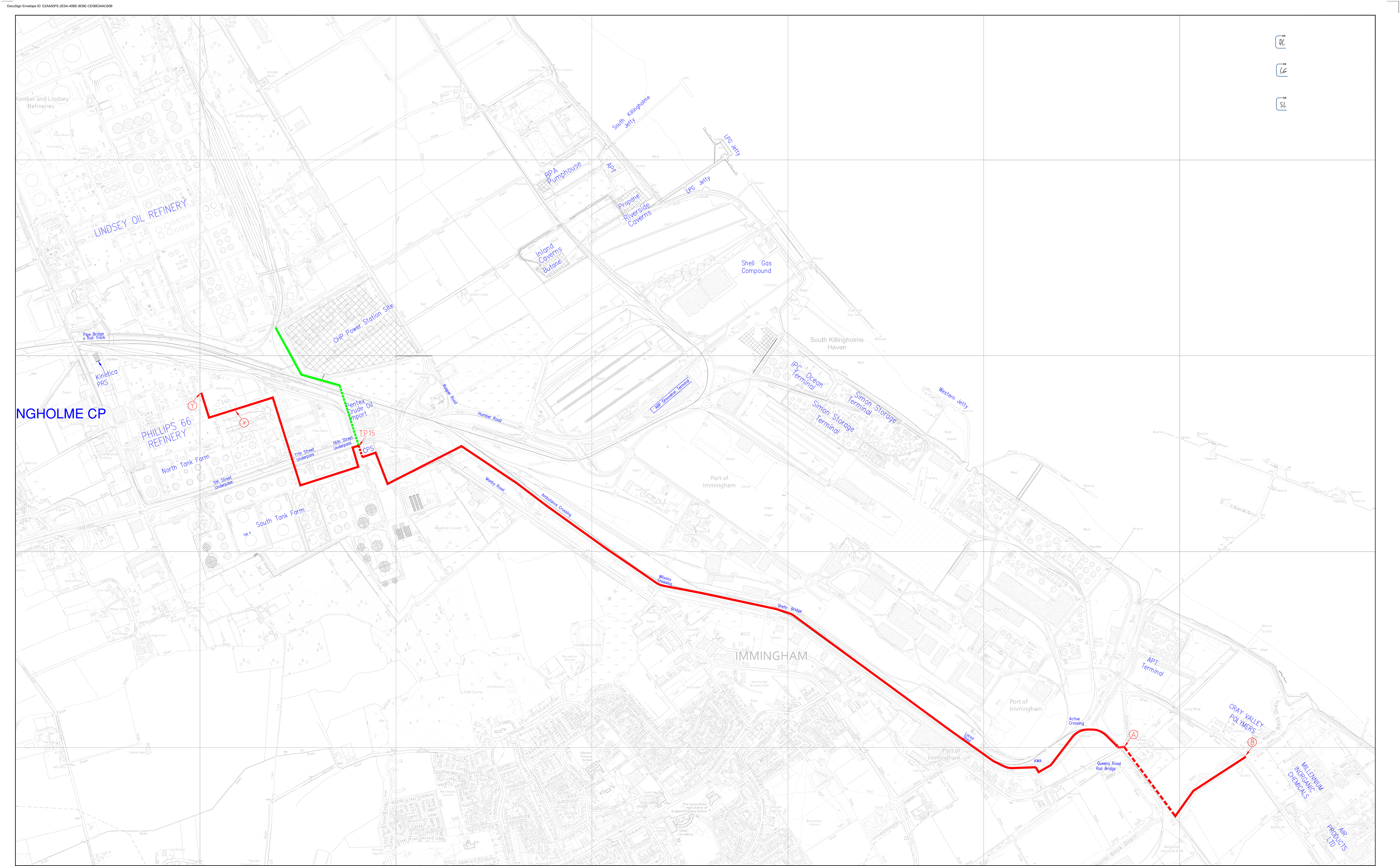
T.I.D. No.	
Tech. Memo/ S.M.C. No.	
A.S.C.	
Task Description	OFFSITE
Discipline	ELECTRICAL
Drawn	FA
Date	11/02/22
Scale	1:6000
Drng No.	1804-2200-A152

PHILLIPS 66 Humber Refinery

**OXYGEN (8" AP4-CWC2020)
PIPELINE ROUTING DRAWING
SOUTH KILLINGHOLME / IMMINGHAM LOCALITY**

Rev. **2**

Annex 2



DC
 LC
 SL

- KEY:**
- - 14" NITROGEN LINE
 - - - - UNDERGROUND PIPING
 - - NITROGEN LINE OWNED BY AIR PRODUCTS
 - TP - TIE IN POINT

Notes

Reference Drawings

Equipment On This Drawing

Rev.	Date	Description	Drn	Chk.	App'd.
3	09/06/22	ISSUED FOR INFORMATION	FA	MA	MA
2	27/05/22	ISSUED FOR INFORMATION	FA	MA	MA
1	05/05/22	ISSUED FOR INFORMATION	FA	MA	MA
0	11/02/22	ISSUED FOR CLIENT COMMENT - REVIEW	FA	MA	MA

T.I.D. No.	
Tech. Memo/ cMOR No.	
A.S.C.	
Client Description	OFFSITE
Discipline	ELECTRICAL
Drawn	FA
Date	11/02/22
Scale	1:6000
Drng No.	

PHILLIPS 66 Humber Refinery

NITROGEN (14" - P4601)
 PIPELINE ROUTING DRAWING
 SOUTH KILLINGHOLME / IMMINGHAM LOCALITY

1804-2200-A151

Rev. **3**