



Written Representations

EN070008

West Lindsey District Council

1. Introduction

1.1 The proposed development comprises of the Viking CCS Pipeline, a Nationally Significant Infrastructure Project. The project consists of a 55km pipeline that will transport up to 10 million tonnes of carbon dioxide a year from Immingham to the former Theddlethorpe Gas Terminal. From here, it will join an existing offshore pipeline to the Viking area within the UK southern North Sea, where the carbon dioxide will be injected into depleted gas reservoirs 2.7km beneath the seabed. Associated infrastructure and ancillary works are also proposed. The applicant is Chrysaor Production (UK) Limited.

1.2 WLDC is one of the host authorities for the project. The other host authorities consist of North Lincolnshire, North East Lincolnshire, East Lindsey and Lincolnshire County Council.

1.3 So far as WLDC is concerned the pipeline would run underground through the District for approximately 2km, from the north east of the settlement of Riby, through agricultural fields, across the A18 and down to the south east where it enters into North East Lincolnshire. One of three proposed block valve stations (Washingdales Lane) will lie outside of, but close to (400m) the District boundary to the south east of Riby.

2. Local and National Policy

2.2 The Central Lincolnshire Local Plan (CLLP) forms part of the development plan for West Lindsey (replacing the previous Central Lincolnshire Local Plan, adopted in 2017). The Local Plan was adopted on 13th April 2023 and therefore represents an 'up to date' statutory development plan to which significant weight should be afforded in decision making under section 105 of the PA 2008.

2.3 The Central Lincolnshire Joint Strategic Planning Committee (CLJSPC) recognises that there is the need to move towards a low carbon future, this is a key theme within the most recently adopted version of the CLLP 2023.

This theme is detailed within Paragraphs 3.1.4. and 3.1.5. of the CLLP states that

3.1.4. The Central Lincolnshire Joint Strategic Planning Committee (CLJSPC) is rising to that challenge as set by parliament. No longer will planning decision makers in Central Lincolnshire merely 'encourage' development proposals to achieve certain standards, or only 'welcome' development that goes a little beyond certain building regulation basic minimums. Development in Central Lincolnshire must do, and can do, far better than that. We are legally obliged to do more. And, for future generations, we are morally obliged to do more.

3.1.5. The four authorities which are represented on the CLJSPC have all recognised the climate crisis we face and the urgent need for action. Indeed, if we continue to emit around 1.2 million tonnes of CO₂ in Central Lincolnshire (as we did in 2018), then by around 2026/27 we will have emitted around 9 million tonnes. 9 million tonnes is Central Lincolnshire's entire CO₂ lifetime budget (or fair share) of global emissions, as calculated by the Tyndall Centre, if the globe is to stay under 2°C rise in temperatures as recommended by the Intergovernmental Panel on Climate Change (IPCC). Put another way, if we continue to emit CO₂ in Central Lincolnshire like we presently do, then from around 2027 we will have exceeded our budget or allowance, and we would then have to rely on other locations to emit less than their fair share to compensate for our excess emissions. Staying below 9 million tonnes does not mean we have to be net zero carbon here in Central Lincolnshire by 2026/27. But it does

mean that the earlier we act now, the more energy we conserve now and the more renewable energy we generate now, then the longer timeframe we get to use up our 9 million tonnes of CO2 budget. The further we push that end date of consuming the 9 million tonnes beyond 2026, the greater chance we all have of achieving a smooth transition to a net zero carbon Central Lincolnshire.

2.4 This is broadly reflected in Policy S16- Energy Infrastructure of the CLLP which states that; *The Joint Committee is committed to supporting the transition to net zero carbon future and, in doing so, recognises and supports, in principle, the need for significant investment in new and upgraded energy infrastructure.*

Where planning permission is needed from a Central Lincolnshire authority, support will be given to proposals which are necessary for, or form part of, the transition to a net zero carbon sub-region, which could include: energy storage facilities (such as battery storage or thermal storage); and upgraded or new electricity facilities (such as transmission facilities, sub-stations or other electricity infrastructure.

However, any such proposals should take all reasonable opportunities to mitigate any harm arising from such proposals, and take care to select not only appropriate locations for such facilities, but also design solutions (see Policy S53) which minimises harm arising.

2.5 NPS (National Policy Statement) EN-1 sets out the national policy for energy infrastructure and is an overarching document that does not specifically cover CCS. However, it does include high level support for CCS projects. NPS EN-1 outlines the Government's ambition to reach the legally binding net zero target by 2050. NPS EN-1 recognises that: *"the most likely method for transporting the captured CO2 is through pipelines"*.

2.6 It is recognised that the proposal would not necessarily help towards net zero within the district, instead transporting CO₂ through part of the District by the underground pipeline. Nevertheless the Central Lincolnshire Local Plan adopted in April 2023 and WLDC is largely supportive of such proposals in principle subject to other material considerations being satisfied.

3. Key Issues WLDC

3.1 WLDC have submitted a Local Impact Report (LIR) which addresses the relevant potential impacts of the development within the District so far as the 2km of underground pipeline is concerned and the development as a whole, where necessary.

3.2 WLDC and the Central Lincolnshire Authorities are generally supportive of such projects as detailed within Section 1 of this statement.

3.3 Visually, WLDC are content with the applicant's submission. Within the WLDC boundary the pipeline would be underground and therefore the visual impacts would likely only be temporary through the construction period with one of laydown areas directly adjacent to the north district boundary and the installation of a temporary access road along the A18- Barton Street. The Washingdales Lane Block Valve Station is to be located c. 400m to the south east of the WLDC boundary. It is minor in its scale and would be contained by appropriate landscaping strips. WLDC is content that the visual impacts upon the AGLV designation are acceptable.

3.4 WLDC is satisfied with the submission in terms of Biodiversity Net Gain and the net increase proposed, which is predicted to be a net gain of 10.42% for area-based habitat units,

a net gain of 2597.43% for hedgerow habitats and a net gain of 26.12% for watercourse habitats . The mitigation for the removal of trees and partial hedgerow removal is considered to be acceptable. Routing of the pipeline has been done to minimise as far as possible the impacts on habitats. Further survey work on the relevant ecology reports is needed and has been recognised by the applicant. WLDC finds that the ecology and biodiversity matters are acceptable.

3.5 The pipeline would run through agricultural fields, which, in this location comprise of Grade 2 and 3 land as defined by Natural England Classifications. WLDC is content with the reinstatement of the agricultural land post burying of the pipeline as detailed within the submitted Outline Soil Management Plan.

3.6 The ongoing archaeology work, comprising of trial trenching is welcomed and the continued discussions between the applicant and Lincolnshire County Council is encouraged. The proposal would preserve the setting of the nearby Listed Buildings within the nearby settlements of Riby and Keelby.

3.7 With regard to Transport, Traffic and Archaeology, WLDC defers to Lincolnshire County Council as their specialist consultees. Traffic and Transport impacts are considered to be acceptable, recognising that the impacts during construction can be appropriately managed through a Construction Environmental Management Plan (CEMP).

3.8 The associated risks of accident and major disasters are detailed within a suite of documents within the DCO submission. WLDC considers that such risks could be appropriately managed through the construction period as well as post development.

4. Conclusion

WLDC and the Central Lincolnshire Authorities support a move, and projects, that contribute towards a net zero future. Overall, the development is considered to have a neutral impact upon the District and WLDC are supportive of the Viking CCS project subject to the DCO securing the relevant considerations and mitigation measures.

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