



Viking CCS Pipeline Project Case Team
Planning Inspectorate
vikingccspipeline@planninginspectorate.gov.uk
(Email only)

MMO Reference: DCO/2024/00006
Planning Inspectorate Reference: EN070008
Identification Number: 20047160

25 April 2024

Dear Sir or Madam,

Planning Act 2008, Chrysaor Production (UK) Limited, Proposed Development Consent Order for the Viking Carbon Capture and Storage (CCS) Pipeline

The Applicant seeks authorisation for the construction and operation of a DCO Application, comprising of a 55.5 kilometre (km) 24-inch diameter onshore pipeline commencing at the Immingham Facility and ending at the Theddlethorpe Facility. The onshore pipeline will connect into the existing 36-inch Lincolnshire Offshore Gas Gathering System (LOGGS) offshore pipeline by means of a crossover. The pipeline will transport carbon dioxide.

The offshore elements of the Viking CCS Project, including the transport of Carbon Dioxide through the LOGGS pipeline to the Viking gas fields under the North Sea are subject to a separate consenting process, through the Offshore Petroleum Regulator for Environment and Decommissioning (OPRED) and North Sea Transition Authority (NTS).

Deadline 1 Submission

This document comprises the Marine Management Organisation's (MMO) Deadline 1 response in respect of the above Development Consent Order (DCO) Application.

This written representation is submitted without prejudice to any future representation the MMO may make about the DCO Application throughout the examination process. This representation is also submitted without prejudice to any decision the MMO may make on any associated application for consent, permission, approval or any other type of authorisation submitted to the MMO either for the works in the marine area or for any other authorisation relevant to the proposed development.



Yours faithfully

Zoe Trott
Marine Licensing Case Manager

D [REDACTED]
E [REDACTED] [@marinemanagement.org.uk](mailto:[REDACTED]@marinemanagement.org.uk)
Copies to: Amy Trakos – Senior Case Manager:
[REDACTED] [@marinemanagement.org.uk](mailto:[REDACTED]@marinemanagement.org.uk)

Responses to the Examining Authority's First Written Questions (WQ1)

- 1.1.1 The MMO note that the ExA has directed a question to the MMO. The MMO has reviewed this question and offer the following response:
- 1.1.2 **Q1.7.40:** *'Schedule 9 Scope of Provisions. There are no Protective Provisions for the Marine Management Organisation as no draft Deemed Marine Licence has been submitted for the offshore elements of the Project. This is raised in other questions, but this would appear to be an important element if the Proposed Development is to become functional. Please comment on this apparent omission?'*
- 1.1.3 It is the applicant's responsibility to identify the marine licensable activities that will be undertaken and to apply for a deemed Marine Licence as part of this DCO application. Alternatively, the applicant can apply for a separate marine licence consent directly from the MMO. The MMO advised the applicant during a call on 19 April 2024 and provided further guidance on identifying the marine licensable activities in the application.
- 1.1.4 The applicant confirmed to the MMO on 23 April 2024, that whilst the order limits stretch to the mean low water springs mark, no marine licensable activities will be taking place below mean high water springs.
- 1.1.5 The applicant also confirmed to the MMO that the offshore works are under a separate consent process, and that they have applied to the North Sea Transition Authority (NSTA) for a carbon dioxide storage licence.
- 1.1.6 The applicant has confirmed that they consider the projects to be separate due to distance between the two proposed works. The applicant therefore considers this as two separate Environmental Impact Assessment (EIA) projects. The applicant is submitting an Environmental Statement for the Offshore works to OPRED as part of the consent process for the carbon dioxide storage licence.
- 1.1.7 Given the above, the MMO have no further comments at this stage. However, the MMO would like to remind the applicant that it is their responsibility to identify any marine licensable activities to be carried out and apply for a marine licence if required.

