

**WRITTEN REPRESENTATION
OF PD PORT SERVICES LIMITED**

Application by Chrysaor Production (U.K.) Limited ("Chrysaor") for an Order Granting
Development Consent for the Viking CCS Pipeline ("the Project")

Introduction

1. This Written Representation is submitted on behalf of PD Port Services Limited (Company Registration Number 01233997) of 17-27 Queen's Square, Middlesbrough, TS2 1AH ("PD Ports").
2. This Written Representation follows PD Ports' Relevant Representation [RR-082]. PD Ports makes this Written Representation on two grounds. Firstly, in order to protect its position in relation to land within and adjacent to the proposed Order limits which PD Ports has the benefit of a restrictive covenant ("the Covenanted Land"). Secondly, to ensure that access to and from the PD Ports warehousing site at Unit 7 Laporte Road, Stallingborough, Immingham DN40 2PR ("Laporte Road") is retained and PD Ports' operations from Laporte Road can continue unaffected from any impacts of the Project.

The Covenanted Land

3. The Covenanted Land is known as Unit 1 and Unit 2 Manby Road, South Killingholme North Lincolnshire and is registered under HMLR titles HS294686 and HS19809. The Covenanted Land is currently owned by Phillips 66 Limited ("P66"). The Covenanted Land is subject to a covenant for PD Ports' benefit restricting its use to those within Use Class B2 or B8 with an ancillary B1 user.
4. As set out in PD Ports earlier Relevant Representation, compulsory acquisition powers were sought for the subsurface of Plot 1/15, being the northern corner of the Covenanted Land and Plots 1/37, 1/46, 1/58, being the eastern tip of the Covenanted Land as shown on Sheet 1 of 36 of the Lands Plans [APP-016].
5. The Change Request [AS-038] to [AS-054] has been accepted by the Examining Authority, which removes Plot 1/15 from the Order Limits. In respect to PD Ports interests, only Plots 1/37, 1/46, 1/58, being the eastern tip of the Covenanted Land, are still affected by the DCO.
6. P66 were reported to have undertaken lengthy discussions with Chrysaor in CAH 1. Chrysaor in turn stated negotiations with P66 are at an advanced stage and a suite of agreements consisting of a lease, a deed of easement and a separate agreement are being progressed. Although PD Ports is listed with the Book of Reference [APP-11], Chrysaor has not engaged with PD Ports concerning the impact of the compulsory acquisition of the Project in respect of

the Covenanted Land. PD Ports does not appear on the Compulsory Acquisition Tracker [APP-030].

7. Therefore, PD Ports still considers that it is presently unclear as to how any rights given to Chrysaor through the DCO will take into account the benefit of its restrictive covenant and that the location of the pipeline will not affect the future development potential of the Covenanted Land.

Laporte Road

8. In addition, the works comprised in the Application will require road closures and diversions which may affect access to PD Ports site at Laporte Road. Access to Laporte Road will also be affected by the proposed Immingham Green Energy Terminal DCO ("IGET"). Road closures and diversions may be exacerbated if the impacts of the two projects overlap.
9. The IGET proposed road closures and diversions will restrict access to Laporte Road from the Immingham Dock to a three mile diversion route using the A1173 and Kiln lane during its construction phase. Egress from Laporte Road uses the Kiln Lane to access the A180 and the wider national road network.
10. The Project proposes works along the A180 and A1173 as shown at Sheets 5 and 8 (at Point 8-SB) of the Public Access and Rights of Way Plan [APP-033]. These works may affect access to and from Laporte Road and potentially interfere with PD Ports' operations. It is unclear how access will be maintained while the IGET diversions are also in place and that these will not result in a further interference with PD Ports' operations.
11. Further, PD Ports considers there is a lack of information provided by Chrysaor with respect to vehicle restrictions, particularly regarding potential weight and height restrictions on the A180 and A1173.
12. Altogether, the lack of this information means that PD Ports cannot fully consider the impact on its own operations as a result of the Project or its impact alongside that of IGET.

Conclusion

13. In light of the above, PD Ports will continue to participate as a Interested Party to the Examination and reserves the right to make further representations

during the Examination process in response to any further information provided by Chrysaor. PD Ports has also requested to speak at CAH 2 on 24 June 2024.

DWF Law LLP on behalf of PD Port Services Limited

25 April 2024