

VPI IMMINGHAM LLP'S RESPONSE TO FWQ 1.5.8

1.5.8 Proposed Change Request and the IAGI. The Applicant has just submitted a Change Request which relates to: a) the reduction of the Order Limits for works related to the IAGI and associated accesses; and b) the removal of Option 2 for the pipeline route in the vicinity of the IAGI. Phillips 66 Limited [RR-084] and Immingham VPI LLP [RR-115] both made objections to the Application. The concerns related not just to the proposed Option 2 but also such issues as the amount of the permanent and temporary land take and also the safeguarding through the Protective Provisions. Do these companies wish to maintain their objections to the application for a DCO and, if so, on what basis?

VPI's Response: VPI Immingham LLP (VPI) welcomes the Change Request and notes that it has been accepted by the Examining Authority. VPI engaged with the Applicant on the changes prior to the Applicant submitting them, and the Change Request has significantly reduced the overlap between the Applicant's proposed development and VPI's proposed carbon capture plant.

VPI continues to strongly support the Applicant's proposed development, which must come forward simultaneously with its own project and both of which are key elements of decarbonising the Humber region and national energy supplies. VPI maintains its representation, but following the Change Request this now only relates to certain areas of land over which the Applicant seeks powers of compulsory acquisition or temporary possession.

Areas of overlap between the two projects remain and need to be regulated to ensure that both can come forward in an appropriate and co-ordinated way. Both projects require access to and use of these areas of land during their respective and overlapping construction periods.

The land over which the Applicant seeks powers of compulsory acquisition and temporary possession and which VPI also requires use of are plots 1/32, 1/57 and 1/59, as shown on the Land Plans (Revision D3, 15 March 2024, EL Ref. AS-049). Additionally, while there is no temporary or permanent possession sought by the Applicant for the land adjacent to plot 1/57 (depicted as a white triangular wedge) on the Land Plans, the red line boundary could result in this land being inaccessible by VPI. VPI requires access to this land and will continue to collaborate with the Applicant to enable this.

Plot 1/32 also has a small 'arm' extending north-west into the site of VPI's proposed capture plant – this is shown on the Works Plans (Revision 8, 15 March 2024, EL Ref. AS-046) as required for Work Nos. 01 (Permanent AGI Construction Works), 01c (Electrical Connection) and 02 (Carbon Dioxide Pipeline Works). However, notwithstanding that, VPI understands that this is required solely for an egress from the Applicant's AGI site in the event of an emergency, and there would not be any structures or buildings erected in this area. On that basis, the Applicant's and VPI's respective developments are not physically inconsistent in this area.

VPI anticipates that regulation of the remaining overlaps and the powers sought in the DCO will be via an agreement between it and the Applicant, along with protective provisions in the DCO. VPI looks forward to progressing the agreement or protective provisions with the Applicant.

25 April 2024