

NORTH LINCOLNSHIRE COUNCIL

LOCAL IMPACT REPORT

Planning Act 2008 (as amended)

Infrastructure Planning (Examination Procedure) Rules 2010

**SUBJECT: APPLICATION FOR AN ORDER GRANTING DEVELOPMENT
CONSENT FOR THE VIKING CCS PIPELINE**

APPLICANT: CHRYSAOR PRODUCTION (UK) LIMITED

SITE: IMMINGHAM TO THEDDLETHROPE

Planning Inspectorate's Reference: EN070008

April 2024

1. INTRODUCTION

- 1.1 This report has been prepared by North Lincolnshire Council in accordance with the advice and requirements set out in the Planning Act 2008 and Advice Note One: Local Impact Reports (Version 2) issued by the Infrastructure Planning Commission in April 2012.
- 1.2 The Advice Note states that when the Commission decides to accept an application it will ask the relevant local authorities to prepare a Local Impact Report (LIR). Its preparation should be prioritised and indicate where the local authority considers the development would have a positive, negative or neutral effect on the area. The Report may include any topics that they consider to be relevant to the impact of the development on their area as a means by which their existing body of knowledge and evidence on local issues can be fully and robustly reported to the Commission.
- 1.3 North Lincolnshire Council (NLC) is one of the host local authorities for the proposed development, which runs through a number of authority areas.
- 1.4 In producing this LIR NLC has not sought the views of local parish councils and local interest groups because the parish councils and other local groups have the opportunity, through the consultation process, to make their observations direct to the Planning Inspectorate.
- 1.5 The Council has engaged in constructive discussions with the application for a number of years prior to the submission of the application for development consent. A Statement of Common Ground is currently in production reflecting those discussions. This LIR represents the current position at the time of drafting and it is anticipated that any concerns or outstanding issues will be addressed through the completion of the statement of common ground.

2. LOCATION

- 2.1 It is considered that the Application documents appropriately set out the context for the site. This includes identification of the existing developments in the area and identification of the nearest settlements, sensitive receptors and other planning constraints. NLC does not wish to add to the description of the site that has been set out in the application documents.
- 2.2 The Order Limits extend for a significant distance and travel through a number of local authority areas. The comments presented in this LIR relate only to those parts of the proposed development and the Order Limits that are located within North Lincolnshire Council's administrative boundary; these being the northern construction compound, the Immingham facility and approximately 1km of the proposed pipeline.

3. PLANNING HISTORY

- 3.1 The Planning Design and Access Statement [APP-129] submitted by the Applicant accurately outlines the planning history of the site in respect of North Lincolnshire at Section 4.2. This includes identifying a number of other Nationally Significant Infrastructure Projects located in area.
- 3.2 Planning applications PA/2023/421 and PA/2023/422, relating to the proposed carbon capture facilities at VPI Immingham and Phillips 66 Humber Refinery are still pending with the LPA yet to issue a formal decision. These applications have been with the LPA for some time and are at a very advanced stage of the determination process. The LPA are currently working with the Applicant's to resolve outstanding concerns raised by statutory consultee's. It is currently anticipated that the LPA will be in a position to issue decisions on both planning applications within the examination period and the ExA will be kept updated on this matter.

4. LOCAL POLICY FRAMEWORK

- 4.1 The current Development Plan for North Lincolnshire comprises the saved policies of the North Lincolnshire Local Plan (NLLP) (2003); the North

Lincolnshire Core Strategy (NLCS) (2011); and the North Lincolnshire Housing and Employment Land Allocations Development Plan Document (HELADPD) (2016). There are no Neighbourhood Plans relevant to the determination of this application. It is considered that these Development Plan documents are “important and relevant” considerations as defined in the Planning Act 2008.

4.2 The Development Plan policies relevant to the consideration of this application are set out below.

4.3 **North Lincolnshire Local Plan (NLLP) (2003):**

- RD2 – Development in the Open Countryside;
- T1 – Location of Development;
- T2 – Access to Development;
- T18 – Traffic Management;
- T19 – Car Parking Provision & Standards;
- R5 – Recreational Paths Network;
- LC1 – Special Protection Areas, Special Areas of Conservation and Ramsar Sites;
- LC2 – Sites of Special Scientific Interest and National Nature Reserves;
- LC4 – Development Affecting Sites of Local Nature Conservation Importance;
- LC5 – Species Protection;
- LC6 – Habitat Creation;
- LC7 – Landscape Protection;
- LC12 – Protection of Trees, Woodland and Hedgerows;

- LC20 - South Humber Bank – Landscape Initiative;
- HE5 – Development affecting Listed Buildings;
- HE8 – Ancient Monuments;
- HE9 – Archaeological Evaluation;
- DS1 – General Requirements;
- DS7 – Contaminated Land;
- DS11 – Polluting Activities;
- DS12 – Light Pollution;
- DS13 – Groundwater Protection and Land Drainage;
- DS14 – Foul Sewage and Surface Water Drainage;
- DS15 - Water Resources; and
- DS16 – Flood Risk; and

4.4 **North Lincolnshire Core Strategy (NLCS) (2011):**

- CS1 – Spatial Strategy for North Lincolnshire;
- CS2 – Delivering More Sustainable Development;
- CS3 – Development Limits;
- CS5 – Delivering Quality Design in North Lincolnshire;
- CS6 – Historic Environment;
- CS11 – Provision and Distribution of Employment Land;
- CS16 – North Lincolnshire’s Landscape, Greenspace and Waterscape;
- CS17 – Biodiversity;
- CS18 – Sustainable Resource Use and Climate Change;
- CS19 – Flood Risk;
- CS20 – Sustainable Waste Management; and

- CS25 – Promoting Sustainable Transport;

4.5 North Lincolnshire Housing and Employment Land Allocations Development Plan Document:

- PS1 – Presumption in favour of sustainable development;
- SHBE-1 – South Humber Bank
- Inset Map 57 – South Humber Bank

4.6 North Lincolnshire Council is currently in the process of preparing a new Local Plan to 2038. Once formally agreed this document will replace the current North Lincolnshire Local Plan (2003), North Lincolnshire Core Strategy (2011) and Housing and Employment Land Allocations DPD (2016).

4.7 NLC submitted the new Local Plan and supporting evidence to the Government's Planning Inspectorate for examination on 11 November 2022. However, the plan is still at an early stage of examination, with hearings currently anticipated to take place in January and March 2025 at the earliest, and a number of unresolved objections. As such the local planning authority is giving very limited weight to the emerging local plan in decision-making and this position is unlikely to change either prior to the close of the examination, or the date by which the Secretary of State is due to make a decision on the application.

4.8 The policies within the emerging Local Plan that are deemed relevant to the determination of the proposed development are as follows:

- SS1 – Presumption in Favour of Sustainable Development;
- SS2 – A Spatial Strategy for North Lincolnshire;
- SS3 – Development Principles;
- SS10 – Strategic Site Allocation – South Humber Bank
- SS11 – Development Limits;
- EC2 – Existing Employment Areas;

- EC4 – South Humber Bank Landscape Initiative
- TC2 – Place Making and Good Urban Design;
- RD1 – Supporting Sustainable Development in the Countryside;
- DQE1 – Protection of Landscape, Townscape and Views;
- DQE3 – Biodiversity and Geodiversity;
- DQE4 – Local Nature Reserves;
- DQE5 – Managing Flood Risk;
- DQE6 – Sustainable Drainage Systems;
- DQE7 – Climate Change and Low Carbon Living;
- DQE11 – Green Infrastructure Network;
- DQE12 – Protection of Trees, Woodland, and Hedgerows;
- HE1 – Conserving and Enhancing the Historic Environment;
- T1 – Promoting Sustainable Transport;
- T3 – New Development and Transport;
- T4 – Parking;
- DM1 – General Requirements;
- DM3 – Environmental Protection;
- ID1 – Delivering Infrastructure;

4.9 In addition to the Development Plan policies listed above, there are supplementary planning documents and guidance documents which have relevance to the proposed development as set out below:

- Sustainable Drainage Systems (SuDS) and Flood Risk Guidance (2017);
and
- Landscape Character Assessment & Guidelines (1999).

5. KEY ISSUES

5.1 The key issues identified by North Lincolnshire Council in relation to this National Significant Infrastructure Project are:

- Local planning policy context

- Landscape and visual impact
- Ecology and Biodiversity
- Traffic and Transport
- Water resources and flood risk
- Historic environment
- Air Quality
- Noise and Vibration

6. LOCAL PLANNING POLICY CONTEXT

- 6.1 The local Development Plan does not make specific allocation of land for new energy related or carbon capture infrastructure/facilities.
- 6.2 The Order limits relevant to North Lincolnshire lie outside of any defined development boundary and are located partly within and partly outside of local policy allocations. The Immingham Facility (Work no.'s 01, 01a, 01b & 01c) is located within strategic employment allocation SHBE-1 (South Humber Bank). This policy allocates 900 hectares of land for B1, B2 and B8 port related activities to take special advantage of the location within an existing port environment, flat topography and being adjacent to an existing deep water channel of the Humber Estuary. This strategic allocation is proposed to be brought forward in the emerging new local plan.
- 6.3 The other parts of the proposed development located within North Lincolnshire are located outside of any policy allocation. These being the northern construction compound (Work no.'s 07, 07a & 07b); and approximately 1km of the pipeline route (Work no.'s 03 & 03a).
- 6.4 It is understood that the western pipeline route option (Work no. 02) is no longer being taken forward for consideration as part of the Development Consent Order application.

- 6.5 Parts of the application site lie outside of defined development limits and as such policies RD2 of the North Lincolnshire Local Plan and CS2 and CS3 are relevant in assessing the principle of development. These policies seek to generally direct development within defined development limits and to previously developed sites. However, Policy RD2 does allow employment related development appropriate to the open countryside provided that the open countryside is the only appropriate location and that the development cannot reasonably be accommodated within development boundaries. Policies CS2 and CS3 similarly make allowance for uses that require a countryside location.
- 6.6 In this instance the proposal seeks to construct carbon capture transmission infrastructure immediately adjacent to existing CO₂ emitters, within a heavily industrialised area. The location of the identified emitters and other potential emitters in the Immingham industrial area is a key driver in site selection. Given this locational requirement and the scale and nature of the development proposed it is not possible to be located within existing development boundaries; this is not uncommon for infrastructure developments of this nature. It is also acknowledged that the Immingham Facility will be developed on brownfield land previously used as construction laydown in connection with the Immingham Power Station. Therefore, there is justification for siting the proposed development outside of defined development limits in this instance.
- 6.7 With regards to the appropriateness of the location, both the application site and the local area has a history of heavy industry and power generation and associated infrastructure. Furthermore, the siting of the proposed development also means that it will be viewed in the context of existing large-scale industrial structures and energy infrastructure. For these reasons it is considered that the proposed development is an appropriate form of development in this location subject to it complying with the relevant policies contained in the Development Plan.

- 6.8 The Immingham Facility is located within strategic employment allocation SHBE-1, which seeks to develop a large area of the South Humber Bank for port related industrial and employment uses. Whilst the proposed development is not port related, it is directly related to the existing industrial uses immediately adjacent the site and within the wider area and as such it's location is considered to be justified. It is also noted at para. 4.4.1 of the Housing and Employment land Allocations DPD that the expected port related activities will be predominantly heavy industrial users and as such pollution and waste control measures will be crucial to the success of the site in sustainability terms. The proposed carbon capture transmission infrastructure will play an important role in allowing the decarbonisation and reduction in polluting emissions from existing and future industrial operations in the area. This is demonstrated by the pending applications for carbon capture facilities at both the P66 Humber Refinery and the VPI Immingham Power Station.
- 6.9 Facilitating the decarbonisation of existing and potential future operators in this heavily industrialised area is in accordance to both local and national planning policy which seeks to minimise carbon emissions and to contribute to sustainable development.
- 6.10 Overall it is considered that the proposed development generally accords with the aims of the Development Plan subject to conformity with the relevant policies of the plan, including those that seek to protect the environment and amenity of the area.
- 6.11 The following sections consider the more detailed elements of the proposal.

7. LANDSCAPE AND VISUAL IMPACT

- 7.1 A Landscape and Visual Impact Assessment (LVIA) has been submitted as part of the ES. It appears to have been prepared in an appropriate manner that is consistent with recognised best practice and guidance, notably the Landscape Institute/IEEMA's 'Guidelines for Landscape and Visual Impact Assessment' (Third Edition), as well as other associated published advice and

technical guidance. It is clear and concise and appears to draw sound and reasonable conclusions regarding the likely landscape and visual impacts of this development in accordance with the guidance. It is therefore regarded to form a suitable basis upon which to assess the landscape and visual impacts of this proposal.

- 7.2 A series of viewpoints have been analysed as part of the assessment and these have been complemented by a collection of photomontages. This viewpoint analysis provides an important assessment of key and representative views from a range of locations at varying distances and aspects and adds value to the information provided in this chapter of the Environmental Statement.
- 7.3 There are no designated landscapes affected by the development that are located within North Lincolnshire. The proposed works relating to the Immingham Facility, the Northern Construction Compound and the relatively small section of pipeline that are located within North Lincolnshire are within a part of the landscape which is heavily industrialised with manufacturing and energy related infrastructure as well as significant transport related infrastructure setting a relatively urban/industrialised context.
- 7.4 There will be changes to views primarily associated with the construction and operational phases of development. However, these changes will be localised in nature and will not be at odds with the existing industrialised nature of the landscape.
- 7.5 Construction impacts will be limited in duration and will primarily affect receptors using the local and national highway network. Views from the edge of the nearest settlement of South Killingholme (in respect of the Northern Construction Compound) will be mitigated as a result of distance and intervening roads and landscaping.
- 7.6 During operation impacts within North Lincolnshire will largely be limited to the Immingham Facility, which will be visible from Humber Road and Rosper

Road, including a 25m high vent stack. Again, these impacts will be very localised and the proposed infrastructure will be viewed against the backdrop of existing heavy industrial uses.

7.7 Landscaping will be used to mitigate the visual impacts of the proposed development and NLC is pleased to note that the Applicant proposes to landscape the Immingham Facility in accordance with policy LC20 of the North Lincolnshire Local Plan (South Humber Bank Landscape Initiative). This is welcomed and details will be agreed at the post consent stage via Requirements.

7.8 Overall it is considered that the landscape and visual impacts of the development relevant to North Lincolnshire will not be significant. This is due to the lack of sensitivity of the landscape in this part of the authority area, existing heavy industrial uses and infrastructure in the area, the localised nature of identified impacts and proposed mitigation through additional landscaping.

8. BIODIVERSITY AND ECOLOGY

8.1. The Environmental Statement contains numerous chapters relating to ecology. The assessments have been prepared in an appropriate manner that is consistent with recognised best practice and guidance. The information that is provided appears to be sufficiently detailed to enable a full appraisal of the potential impacts of the development.

8.2 The ES identifies known sites of ecological importance. Bespoke study areas were identified for varying nature conservation interests around the Order limits. An extensive suite of surveys were undertaken in support of the proposals, including surveys for habitats and a range of protected and notable species.

- 8.3 The submitted Report to Inform the Habitats Regulations Assessment has identified a likely significant effect (LSE) on the Humber Estuary Special Protection Area (SPA) and Ramsar site due to noise and visual disturbance of breeding avocet and wintering and passage waterbirds using Rosper Road Pools. This effect may occur due to the project alone, but also acting in combination with one or more other projects proposed around Rosper Road Pools. The use of close-board noise fencing is proposed to attenuate sound power levels to an acceptable standard, in order to ensure no adverse effect on the integrity of the Humber Estuary Special Protection Area (SPA) and Ramsar site. This mitigation measure will need to be secured by DCO requirements.
- 8.4 The Local Sites in North Lincolnshire that lie close to the proposals are all Local Wildlife Sites (LWS). These are:
- Rosper Road Pools LWS
 - Mayflower Wood Meadow LWS
 - Burkinshaw's Covert LWS
 - Eastfield Road Railway Embankment LWS
- 8.5 Station Road Field LWS has already been lost to the Able Marine Energy Park development, with compensatory neutral grassland habitat developing at Halton Marshes Wet Grassland.
- 8.6 Mitigation measures proposed within the Construction Environmental Management Plan (CEMP) are set out in section 6.9 of the PEIR and are welcomed. With mitigation measures in place, no significant impacts on Local Sites or priority habitats are anticipated within North Lincolnshire.
- 8.7 It should be noted that it is relatively easy for a hedgerow to be "important" in North Lincolnshire due to the reduced criteria thresholds and the potential to count additional features. See:
<http://www.legislation.gov.uk/ukxi/1997/1160/schedule/1/made>

- 8.8 Proposals to minimise impacts on hedgerows and to carry out reinstatement are welcomed.
- 8.9 Appropriate measures to safeguard protected and priority species are proposed in the CEMP.
- 8.10 Appropriate measures are also proposed to deal with any invasive non -native species that are encountered, including Japanese knotweed, giant hogweed and Himalayan (Indian balsam).
- 8.11 Overall, an appropriate approach has been followed for the survey of habitats and species. Impacts are proposed to be avoided where possible, through careful siting of the pipelines. The detailed consideration of alternatives prior to the selection of the proposed route is welcomed. Other mitigation measures are proposed as appropriate.
- 8.12 The commitment to providing Biodiversity Net Gain is welcomed. However, it appears that the approach to the Immingham Facility requires further explanation. The VPI Carbon Capture (PA/2023/421) baseline survey shows the area as scrub and grassland. However, the Viking CCS baseline shows bare ground. This may reflect an assumption that the VPI development will have taken place in advance of Viking CCS and will have addressed habitat losses, but this is not clear.
- 8.13 In the biodiversity metric, high strategic significance should only be assigned where there is an adopted document that gives guidance on a specific location. Blanket Biodiversity Action Plan proposals are not likely to be adequate. High strategic significance should be assigned sparingly as it results in less habitat being created than would otherwise be the case (Defra).
- 8.14 Similarly, ecological desirability (medium significance) should reflect the position in the landscape, not just the potential for protected or priority species.

8.15 BNG proposals appear to differ from those in the LEMP.

9. TRAFFIC AND TRANSPORT

- 9.1 The Council has assessed the submitted information concerning the assessment of potential traffic and transport effects of the proposed development. This is set out in ES Chapter 12 (Traffic and Transport) and supporting appendices, including a Transport Assessment (TA), draft Construction Environmental Management Plan (CEMP) and draft Construction Phase Traffic Management Plan (CTMP).
- 9.2 The assessments submitted focus on the impact of the construction phase of the pipeline as vehicle movements during the operational phase are anticipated to be minimal so were scoped out of the assessment.
- 9.3 The nature of the proposals mean that the majority of the works will occur outside of North Lincolnshire. However, the Immingham Facility, Northern Construction Compound and short section of pipeline are located within North Lincolnshire.
- 9.4 Chapter 12 and the TA state that the anticipated hours of work for the majority of staff will be 07:00 – 19:00 and therefore the majority of movements will occur outside the peak hours on the highway network. The draft CTMP (Appendix 12.5) suggests working hours of 07:00 – 17:00 in the winter and 07:00 – 19:00 in the summer. If this is the case, the vehicle trips in winter are still likely to fall outside of the evening peak on the highway network, which is identified as 16:00 – 17:00.
- 9.5 The Northern Compound is located on Habrough Road, just to the south of Habrough Roundabout on the A160. This is the location which was used as the site compound for the A160/A180 works and it is assumed that the existing site access will be used, which is acceptable for this type of usage. Although the site access is within North Lincolnshire, it is anticipated that most vehicles will access the site via the A160, which is part of the Strategic Road

Network and therefore the responsibility of National Highways. Any traffic arriving from the south will be travelling on roads which are the responsibility of North East Lincolnshire Council. It is therefore unlikely that construction traffic travelling to the Northern Compound will have an adverse impact on the adopted highway within North Lincolnshire.

- 9.6 The Immingham Facility is located to the east of Rosper Road. Access for construction traffic will be from a temporary access point on Rosper Road, with the creation of a permanent access on Rosper Road for operational purposes. No location plans or indicative designs appear to have been submitted for the proposed. The locations and designs will need to be agreed with North Lincolnshire Council. It is expected that they will be designed to DMRB standards and meet the relevant visibility requirements.
- 9.7 Table 23 in Appendix 12-2 (Construction Traffic Flows) estimates there will 54 two-way vehicle movements per day to the access point, which is a modest increase on the AADT flows. It is therefore not anticipated that the construction of this facility will have an adverse impact on the adopted highway within North Lincolnshire.
- 9.8 A short section of pipeline will be provided within North Lincolnshire, from the Immingham Facility to the A180. Two options have been identified for the routing of the pipeline; however it is understood that the eastern route option has now been selected, this will involve crossing Humber Road and the railway line before running parallel to Manby Road. The proposed method of crossing Humber Road will need to be agreed at an early stage with the relevant Highway Authority. Any required traffic management measures will need to be agreed with North Lincolnshire Council, National Highways and possibly North East Lincolnshire Council.
- 9.9 A draft CEMP and CTMP have been submitted. The draft CEMP sets out the initial mitigation measures that have been identified to avoid or reduce adverse impacts during construction. It is intended that the draft CEMP will be updated during the FEED (Front End Engineering Design) process and

finalised by the appointed contractor prior to the start of construction. The final CEMP will cover all construction activities and will require approval by all local authorities prior to construction commencing. It will however remain a live document and will be updated as and when required.

- 9.10 The draft CEMP lists a suite of separate environmental control plans, including a CTMP and Travel Plan, which will be developed prior to construction.
- 9.11 Both Chapter 12 (Traffic and Transport) of the Environmental Statement and the CEMP include a comprehensive list of suggested measures that will be implemented to mitigate against the impact of construction traffic on the highway network. A framework CTMP has been submitted with the DCO application, although this appears to focus more on the technical details associated with construction traffic, than how the impact of construction traffic will be mitigated.
- 9.12 In conclusion, , it is agreed that the main impact of the scheme will be during the construction of the pipeline and associated infrastructure. The majority of vehicle movements will either occur outside of North Lincolnshire, or on the Strategic Road Network within North Lincolnshire. Only a small number of movements are predicted to occur on the local road network within North Lincolnshire. The impact of these movements will be managed through the CEMP and associated CTMP. The construction of the Proposed Development is therefore not predicted to have an adverse impact on the local highway network within North Lincolnshire.

10. WATER RESOURCES AND FLOOD RISK

- 10.1 The application has been accompanied by detailed reports and assessments exploring the impact of the development on water resources and flood risk. The reports appear to have been carried out to accepted standards and methodologies.

- 10.2 Construction flood mitigation measures would be applied to reduce the risk to the construction sites and workers. The standard construction methods and mitigation are described in the Draft CEMP (including the need for the contractor to produce a Flood Warning and Evacuation Plan to cover emergencies. Given this mitigation, flood risk can be effectively and appropriately managed during the construction phase.
- 10.3 The Immingham facility is proposed to be a manned facility and is located within an area of tidal flood risk due to its proximity to the Humber Estuary. There is the potential for impact on operational staff associated with the residual tidal flood risk associated with a breach of the Humber flood defences. The submitted Flood Risk Assessment (FRA) (ES Volume IV: Appendix 11.5) contains details of the residual breach tidal flood risk to these facilities, with average modelled flood depths up to 3.25 m, 2.01 m, 2.06 m within the Immingham Facility. However it is proposed that the Immingham Facility will not remain operational during a breach flood event given that the facilities which feed CO₂ into the pipeline would shut down during the flood event. Given that the likelihood of a breach event occurring is very low, and the sites will not be operational during a breach event, the likelihood of an impact to the workers is very low.
- 10.3 There are no impacts on surface water receptors, flood risk and people, property and infrastructure anticipated with the buried pipeline, given that the pipeline will be buried to a suitable cover beneath the ground and watercourses.
- 10.4 A Surface Water Drainage Strategy has been submitted and there will be a need to agree a detailed surface water drainage scheme for the Immingham Facility prior to construction of the facility. This mitigation is adequate to ensure that there are no unacceptable impacts as a result of an increase in surface water flood risk.

11. HISTORIC ENVIRONMENT

11.1 The Council has reviewed the following documents for the section of the project that falls within North Lincolnshire:

- APP-050 Environmental Statement - Volume II - Chapter 8: Historic Environment
- APP-089 Environmental Statement - Volume IV - Appendix 8-1: Historic Environment Desk Based Assessment
- APP-090 Environmental Statement - Volume IV - Appendix 8-2: Aerial Review and Light Detection and Ranging (LiDAR)
- AS-001 Environmental Statement - Volume IV - Appendix 8-3: Written Scheme of Investigation (WSI) for Archaeological Evaluation. (Supersedes APP-091).

11.2 These comments take account of the Applicant's Change Request dated 19th March 2024 and the revised boundary of the DCO at the northern end of the project in North Lincolnshire as shown on: AS-046
4.2_Works_Plans_Part_1_of_2_Revision_A.

11.3 The short section of this project in North Lincolnshire comprising the Immingham Facility and the northernmost section of the pipeline contains a wealth of archaeological and palaeo-environmental evidence. This evidence attests the presence of Bronze Age, Iron Age and Roman occupation and activity, including evidence of salt-working, on and around the edge of the former coastline and salt marshes where former tidal inlets provided access to the Humber estuary and Lincolnshire coast.

11.4 One such former tidal inlet is located at the Immingham Facility where previous and recent archaeological investigations have identified an enclosed Iron Age roundhouse settlement located on the southern edge of the inlet which was infilling at this time. The settlement was first identified in the investigations for the A160/A180 upgrade and Rosper Road/Manby Road roundabout link in 2015/2016.

- 11.5 More recently, in 2023, archaeological investigations were undertaken for the proposed VPI Carbon Capture Plant (pending planning application ref: PA/2023/421) that coincides with the area of the Immingham Facility site. Here, archaeological evaluation comprising geoarchaeological boreholes and palaeoenvironmental assessment and archaeological trial trenching identified the continuation of the Iron Age farmstead northwards within the Immingham Facility site.
- 11.6 The earlier phase of Iron Age settlement was replaced into the Roman period and in the 3rd century AD a separate occupation area developed to the east across an area that straddles Rosper Road. These later Roman settlement remains were left in-situ beneath the surface of the VPI CHP car park adjacent to the road, they lie just to the north of the DCO red line boundary at the northeast corner of the Immingham Facility.
- 11.7 The extents of the settlements north and south of the former tidal inlet at the Immingham Facility/VPI Carbon Capture Plant and CHP sites are not accurately shown in the Desk Based Assessment Report (APP-089; Fig 3 (2 of 20), gazetteer monument nos 9, 10, 13) as the HER data was obtained in mid-2022 before the latest investigations and the HER has been updated since.
- 11.8 The Iron Age and Roman settlements on and around the Immingham Facility are among several other occupation sites of these periods in the surrounding area in North Lincolnshire. These are described within Chapter 8 of the Environmental Statement [APP 050] with the exception being a new recorded monument, a Ring Ditch and undated gullies identified during a trial trench evaluation on the south side of the A180 adjacent to the DCO boundary. These features are considered likely to represent an Iron Age/Romano-British roundhouse and occupation site and may form part of a larger site located to the southeast just inside the North-East Lincolnshire boundary recently identified by geophysical survey.

- 11.9 The applicant has undertaken geophysical survey along much of the pipeline route, none of which was in North Lincolnshire.
- 11.10 Geophysical survey data is available for the Immingham Facility site courtesy of the VPI Carbon Capture plant evaluation; the route of the pipeline to the south along on the north side of the A180 was deemed unsuitable for geophysical survey due to the presence of overground pipes and below-ground services. The pipeline route then crosses into North-East Lincolnshire.
- 11.11 The applicant is currently proposing to undertake archaeological trial trench evaluation to further inform the archaeological assessment. This work was due to commence in early April. No further archaeological trial trenches are required at the Immingham Facility, the evaluation for the VPI Carbon Capture plant was comprehensive (AOC, 2023 updated March 2024) and provides adequate information to assess the Viking CSS project.
- 11.12 Two trial trenches along the pipeline route in North Lincolnshire are proposed north of the A180 where access/existing constraints allow. The trenches target the area where the site of a possible Medieval farmstead is recorded within the DCO limit (APP 089, Fig 3 (2-20), monument no. 25) and the probable Iron Age/Romano-British Ring Ditch is located immediately adjacent to the DCO boundary.
- 11.13 Until the trial trenches are completed and reported on, the identification and assessment of archaeological significance of any unknown remains present in the section of the pipeline in North Lincolnshire cannot be made. It is expected that the results of the trial trench evaluation will be made available during the Examination period.
- 11.14 The northern construction compound for the project lying to the west of Habrough Road is also within North Lincolnshire. This area was evaluated for the A160/A180 upgrade in 2014/15 and subsequently used as a construction compound. No archaeology was identified in the evaluation trial trenches and

no further archaeological work is considered necessary for the Viking CCS project.

- 11.15 The archaeological impacts of the Viking CCS project at the site of the proposed Immingham Facility can be well understood from the existing archaeological data. Work No.01, Work Nos.1a-c and Work No.02 (AS-046) will directly impact archaeologically significant Bronze Age, Iron Age and Roman remains described above, resulting in their destruction.
- 11.16 As such, this area will require archaeological mitigation to off-set this harm comprising archaeological strip map and record excavations in advance of the commencement of any groundworks associated with construction.
- 11.17 A Framework (Outline) Written Scheme of Investigation (WSI) for the archaeological mitigation investigations at the Immingham Facility should be prepared at the earliest opportunity and submitted during the Examination period to inform the assessment and decision-making process. The outline WSI for the Immingham Facility should be appended to the draft CEMP (APP-068).
- 11.18 The outline WSI should make provision for the preparation of a detailed project design to be prepared by archaeological contractor appointed to undertake the programme of excavation and post-excavation. The contractor's detailed project design would constitute the written scheme of investigation referred to under Schedule 2, Requirement 10 of the draft DCO (APP-006).
- 11.19 It should be noted that an archaeological mitigation strategy set out in a Framework WSI for Excavation has already been prepared and agreed with the local planning authority for the proposed VPI CC Plant that fully encompasses the area of the proposed Immingham Facility (PA/2023/421). It is unclear which of these developments would be constructed first should both be permitted.

- 11.20 Project planning and programming for the Viking CCS project will therefore need to pay close attention to the sequencing of these two developments ensuring that adequate time is allowed for the archaeological excavations to take place at the Early Works stage of the project should the Viking CCS project and construction of the Immingham Facility and works precede the construction of the VPI CC Plant.
- 11.21 Until the results of the evaluation trial trenching within North Lincolnshire to the south of the Immingham Facility are available to inform and complete the assessment of archaeological significance, the need for additional mitigation works cannot be commented on.
- 11.22 This information should be made available prior to the close of the examination so that the Examining body and Local Planning Authority has the opportunity to assess the results and the scope and content of any necessary mitigation measures to avoid or off-set harmful impacts.
- 11.23 With regards to built heritage assets, the tallest element of the proposed development is the vent pipe at the Immingham Facility at 25m, which in views east may be seen against the backdrop of the 3 no listed lighthouses in that area, however given there are already quite a range of tall industrial structures in the vicinity the development is not considered to represent a notable change to the setting of the lighthouses.
- 11.24 Other listed buildings further afield will not be affected due to distance and a lack of intervisibility.

12. AIR QUALITY

- 12.1 The Council has assessed the submitted information concerning the assessment of potential effects of the proposed development in respect of air quality. This is primarily set out in Chapter 14 of the ES and it's appendixes. The assessment appears to have been carried out to recognised and appropriate standards and methodologies.

12.2 Following the scoping and consultation process that has been undertaken, the scope of the air quality assessment in this chapter is as follows:

- Construction phase dust assessment (including site plant and non-road mobile machinery (NRMM) emissions) in line with Institute of Air Quality Management (IAQM) guidance.
- Construction phase site plant and non-road mobile machinery (NRMM) emissions assessment in line with IAQM guidance.
- Screening of construction phase road traffic emissions assessment in line with IAQM and Environmental Protection UK guidance

The proposed development covers several Local Authority Boundaries and is divided into Sections. Section 1 is most relevant for North Lincolnshire.

12.3 In accordance with IAQM Guidance, due to the presence of high sensitivity receptors within the screening distances set by the guidance, a detailed assessment of construction dust impacts is required.

12.4 Section 1 is classed as a 'medium risk' for dust soiling sensitivity and 'low risk' for human health sensitivity. The overall magnitude of risk is classified as 'medium-risk' without appropriate mitigation measures.

12.5 Section 14.8 of the report describes mitigation measures and references a Draft CEMP (*ES Volume IV: Appendix 3.1*) which has been reviewed. The DCO includes a requirement for the CEMP to be submitted to and approved by the relevant local planning authority prior to commencement of development.

12.6 Section J of the Draft CEMP contains measures relating to air quality which are detailed and extensive in nature. NLC agree that potential air quality impacts as a result of the construction phase can be appropriately mitigated via the implementation of the proposed CEMP. No significant air quality impacts are anticipated during the operational phase of development.

13. NOISE AND VIBRATION

13.1 The Council has assessed the submitted information concerning the assessment of potential effects of the proposed development in respect of noise and vibration. This is set out primarily within Chapter 13 of the ES. This assessment appears to have been carried out in accordance with appropriate guidance and methodologies.

13.2 The Noise and Vibration assessment considers the following:

- Noise and vibration associated with construction and decommissioning works;
- Road traffic associated with construction and decommissioning works; and
- Noise associated with operational activities associated with Immingham Facility, Block Valve Stations and Theddlethorpe Facility

13.3 Baseline noise monitoring has been carried out to establish the existing noise climate at sensitive receptors within the noise and vibration study area.

Attended and unattended measurements were undertaken from 19 January to 26 January 2023 and from 26 January to 3 March 2023. Relevant to North Lincolnshire, attended monitoring was undertaken at NM1 (R1) – Properties on School Road, South Killingholme and NM17 (R50) – Hazel Dene, Marsh Lane, South Killingholme.

13.4 Using the calculated distances in Table 13-19, distances between sensitive receptors and the nearest boundary of the DCO Site Boundary were used to predict what properties would be affected by the Lowest Observed Adverse Effect Level (LOAEL) and Significant Observed Adverse Effect Level (SOAEL) for each assessment phase. Receptors R1 and R50 (those within North Lincolnshire) are not identified as being subject to a SOAEL impact.

13.5 The Northern compound located south of Harborough Roundabout and the A160 is approximately 200 m away from the nearest receptor R1 to the north. The set-up phase at the northern compound will likely require the use of bull

dozers and graders to complete the earthworks. As these works are temporary in nature and 200 m away from the nearest residential receptor, noise emissions from plant would not generate a significant effect. Notwithstanding this, activities in the construction phase would be controlled through mitigation measures secured in the CEMP.

- 13.6 Section I of the Draft CEMP contains measures relating to noise which are detailed and extensive in nature.
- 13.7 The highest levels of vibration that would be generated by pipeline construction would be vibratory roller use during reinstatement. Vibratory rollers may generate significant levels of vibration (i.e., exceeding 1.0 mm/s) at receptors within 20 m. Consequently, receptors within 20 m of Proposed Development route are identified as experiencing an exceedance of the SOAEL and a significant vibration effect. Receptors within 50 m are identified as an exceedance of the LOAEL.
- 13.8 Receptors R1 and R50 (those within North Lincolnshire) are not located within 20m of the pipeline route and will therefore not be subject a SOAEL impact.
- 13.9 However, measures to control vibration as defined in Section 8 of BS 5228-2 will be adopted where reasonably practicable. These measures will be secured within a Construction Environmental Management Plan (CEMP) for the construction phase.
- 13.10 Calculations of construction traffic noise during pipe set up and transport indicate a change in road traffic noise of, at worst, 0.5 dB. This is equivalent to a Negligible effect, which is not significant.
- 13.11 Calculations of construction traffic noise during construction of site access indicate a change in road traffic noise of, at worst, 1.6 dB. This is equivalent to a Minor Adverse effect, which is not significant. The roads predicted to experience a minor adverse effect are located outside of North Lincolnshire.

- 13.12 The impact of operational noise from the Immingham Facility, Block Valve Stations and the Theddlethorpe Facility (Options 1 and 2) have been assessed following the methodology set out in BS 4142. No receptors within North Lincolnshire are identified in close proximity to the above locations.
- 13.13 NLC are of the view that the proposed development will not result in significant noise and vibration impacts upon receptors within North Lincolnshire and that impacts in this regard will be appropriately mitigated via the implementation of the proposed CEMP. Impacts are not expected during operation.

14. CONCLUSION

- 14.1 National guidance on Local Impact Reports recommends that a view is given by the local planning authority of the relative importance of different social, environmental or economic issues and impacts of the scheme on them.
- 14.2 Short term negative social and environmental impacts are anticipated during the construction phase. Such impacts include increased traffic generation, construction disturbance and increased emissions. Longer term adverse impacts include the visual intrusion caused by the above ground installations; and the potential impact on heritage assets. North Lincolnshire Council are of the view that via the implementation of impact avoidance, design and mitigation measures that will be secured through Requirements (subject to comments raised above) contained within the draft DCO and through other regulatory regimes that these negative impacts will not be significant.
- 14.3 The Council also considers that the proposed development would provide a positive impact in terms of contributing to a reduction in the carbon emissions of the heavy industry and energy generating facilities located on the South Humber Bank.
- 14.4 The Council has been fully involved in the scheme throughout the pre-application consultation process and work will remain ongoing through the

Examination process. Additional clarification is required in respect of BNG proposals for the Immingham Facility and the archaeological investigation of the pipeline route located within North Lincolnshire; however it is anticipated that these issues can be addressed and updated within the pending Statement of Common Ground.

- 14.5 Overall, the Council is satisfied that the submitted application provides sufficient information to demonstrate that the principle of the application is acceptable and the Council would not wish to make an in principle objection.