

**Date:** 26 April 2024

**Our ref:** 473732

**Your ref:** EN070008



## **Summary of Natural England's Written Representations (dated 26 April 2024) in respect of Viking CCS Pipeline**

Natural England's advice is that, in relation to identified nature conservation issues within its remit, there is no fundamental reason of principle why the project should not be permitted. However, Natural England considers that the applicant has provided insufficient evidence and is not yet satisfied that the following issues have been resolved:

- **Internationally Designated Sites - Humber Estuary Special Protection Area (SPA)**

- Temporary loss of functionally linked land for non-breeding birds during construction (NE3, NE6, NE12) ('amber').
- Noise and visual disturbance to non-breeding birds within functionally linked land during construction and decommissioning (NE3, NE16, NE18) ('amber').
- Noise and visual disturbance to breeding birds within functionally linked land during construction (NE15) ('amber').
- Lighting disturbance to breeding and non-breeding birds within functionally linked land during all phases (NE8) ('amber').
- Noise and visual disturbance to breeding birds within functionally linked land during operation (NE9) ('amber').
- In-combination assessment (NE24) ('amber').

- **Nationally Designated Sites - Humber Estuary Site of Special Scientific Interest (SSSI)**

- As per Internationally Designated Sites above.

- **Nationally Designated Landscapes - Lincolnshire Wolds National Landscape**

- Assessment of alternatives (NE29a) ('amber').
- Assessment of the Special Qualities of the Lincolnshire Wolds National Landscape (NE29b-c) ('amber').
- Residual landscape and visual effects on the statutory purposes of the Lincolnshire Wolds National Landscape during construction and operation (NE29d-h) ('amber').

- **Soils and Best and Most Versatile Agricultural Land**

- Survey Approach - Extent (NE26b) ('amber')
- Outline Soil Management Plan (NE26c-e) ('amber')

Natural England has also noted several 'yellow' issues. We would ideally like to be addressed, but we are satisfied that for this particular project it is unlikely to make a material difference to our advice or the outcome of the decision-making process.

- **Internationally Designated Sites - Humber Estuary Special Protection Area (SPA)**
  - Non-breeding bird surveys - pipeline route (NE4) ('yellow').
  - Assessment of impacts to black-tailed godwit (NE7) ('yellow').
  
- **Soils and Best and Most Versatile Agricultural Land**
  - Survey Approach - Timing (NE26a) ('yellow')
  - Outline Soil Management Plan (NE26f-g) ('yellow')

We welcome the further information provided by the applicant since submission of our Relevant Representations (RR-073) and consider that the following issues have now been resolved, subject to the completion of agreed revisions to the Habitats Regulations Assessment (HRA) for internationally designated sites issues, and subject always to the appropriate requirements being adequately secured for all relevant issues:

- **Internationally Designated Sites - Humber Estuary Special Protection Area (SPA)**
  - Inclusion of the most recent list of component species of the Humber Estuary SPA waterbird assemblage (NE2) ('green')
  - SPA non-breeding bird usage at the Northern Compound (NE5) ('green')
  - SPA non-breeding birds at Viking Fields during maintenance visits to the dune isolation valve (NE10) ('green')
  - Timing of works at Viking Fields (NE14) ('green')
  - In-combination assessment of disturbance to SPA birds at Rosper Road Pools (NE17) ('green')
  - Works within the SAC (NE21) ('green')
  - Cumulative impacts assessment (NE25) ('green')

Please refer to Natural England's Written Representations (dated 13 March 2024) for detailed advice and response to the Examining Authority's (ExA's) first written questions.