

Strategic Matters for consideration at Issue Specific Hearing 2.

The investment company EIG has recently sold its ownership of West Burton CCGT power station to the petrochemicals group Total. Harbour Energy and EIG had an agreement concerning a potential pipeline system to transport CO₂ captured at that power station to the network of Viking CCS. Unless it differs from the recent trend amongst its peers, Total may follow the industry trend of investing in further fossil fuel production – delaying any commitment to design post-combustion carbon capture facilities at West Burton.

That trend (which BP, Harbour Energy's partner in Viking CCS, appears to be following) tends to undermine hopes that, by 2030 (the year by which the electricity grid must be fully decarbonised), the onshore Viking pipeline will have both CO₂ to transport and somewhere suitable beyond Theddlethorpe to send it (and something suitable to convey it).

This reinforces concern that the Applicant's "salami slice" proposal serves as a convenient fig leaf for the fossil fuel sector (and flawed government climate policy). By boosting their apparent credentials (and investor sentiment), proponents buy themselves time.

The recent Supreme Court judgement overturning Surrey Council's planning approval for Horse Hill fossil fuel project may affect commitment to Viking CCS. Clause 108 of that judgment includes the following sentence:

"An assumption made for planning purposes that non-planning regimes will operate effectively to avoid or mitigate significant environmental effects does not remove the obligation to identify and assess in the EIA the effects which the planning authority is assuming will be avoided or mitigated."

This presumably requires estimates for the probability that all greenhouse gas transported by the onshore pipeline will be permanently stored, from the moment the first supplies are transported, and that this will be before 2030.

Similarly, recent Judicial Reviews concerning the Secretary of State's granting of approval for two DCOs - Net Zero Teesside (current) and carbon capture facilities at Drax power station (withdrawn, perhaps under pressure) – and court cases over-ruling approvals for Whitehaven coal mine (Cumbria) and oil development in Biscathorpe (Lincolnshire) highlight fundamental weaknesses in policy.