

PLANNING ACT 2008 (as amended)

INFRASTRUCTURE PLANNING (EXAMINATION PROCEDURE)
RULES 2010

Rule 17 - Deadline 6 Response

SUBJECT: Viking CCS Pipeline

APPLICANT: Chrysaor Production (UK) Limited

INTERESTED PARTY:

**NORTH EAST LINCOLNSHIRE
COUNCIL**

Interested Party Reference number: 20047168

YOUR REF: EN070008

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Following the submission of Deadline 6, North East Lincolnshire Council's closing statement response is below.

Highways and Transport Matters;

The supplementary information provided by the applicant has been reviewed by Highways Officers and the following comments have been provided;

We have reviewed the RSA provided and we have concluded that we have significant concerns as to its failure to consider all 4 junctions within the application that we are currently in discussion about. There are a number of items to which we agree.

Based on that document, we will now provide our observations as follows.

The document in our possession at point 1.2.2 shows a map of the general area in which the scheme is located. This map identifies 4 locations access 11AA, 11AC, 12AA and 13AA.

Item 2.1.1 suggests the audit team have not been made aware of any previous audits, which would indicate that they have looked at this scheme in the entirety.

Section 3 identifies items observed by the Audit Team.

3.1.1 fails to identify specific locations and generalises the concerns detailed at 'various' locations. The image depicts access 11AA only.

3.1.2 identifies access 13AA specifically.

3.5.1 identifies locations 10AA, 11AA and 11AC and provides solutions regarding signs and movement recommendations. To date, we have no detailed information regarding proposal 10AA.

3.5.2 suggests signage at locations 10AA, 11AA, 11AC, 12AA and 13AA. This discusses 5 locations when the original map at 1.2.2 identifies 4 locations.

What is of major concern to us is that there has been no concerns or observations made regarding access 12AA. We deem this access to be totally unacceptable from a road safety perspective.

The A18 from its junction with the A46 to the county boundary had a long history of Killed and Seriously Injured (KSI) history.

As an example, collision data 2001 – 2015 records 8 fatal collisions with 12 fatalities, 37 serious injury collisions and 102 slight injury collisions. Included in that data is an example of a fatal collision which occurred in 2008 at the exact location of the proposed access 12AA. A significant proportion of the collisions recorded occurred between the A46 and the B1203.

As a result of this collision data, major improvements to the A18 have taken place and data from 2016 to the present day shows zero fatalities, 3 serious injury collisions and 20 slight injury collisions. This is a marked improvement and a clear success for the Authority in reducing road casualties and increasing public confidence that the A18 is a safer place.

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Having visited the site with the Road Safety Engineer to undertake observation and assessment of the proposed access 12AA, we wholly agree that 12AA is fundamentally unsafe to all road users, and that only one single access should be permitted at 13AA subject to the conditions listed below. We understand that this will result in the necessity to create a haul road off highway as a result however, given the risks of creating 12AA, we feel that this would be the safest and most acceptable solution.

Junction 11AA

- *Current design will result in larger vehicles having to commence the turn right into the access at the point where vehicles are exiting, creating a risk of conflict.*
- *Junction radii should be reviewed for access and egress to ensure vehicles can safely turn right into the access without creating a risk of conflict with vehicles exiting from the site.*
- *Some localised widening is proposed to accommodate right turn ghost island – no details on proposed running lane widths have been identified for the existing carriageway. Running lane widths on main A46 carriageway are critically important having regard to the increased risks of side swipe collisions or head on collisions with vehicles waiting to turn right from the ghost island.*
- *Junction geometry requires review to allow for vehicles to safely turn left into the site should they miss the initial turn – this will also assist with right turn manoeuvres into the site allowing additional space for the turn.*
- *No details provided on existing signage. Review required for any existing signage which may obstruct the visibility splays and details on where these signs will be relocated to*

Also, regarding the suggested wording that was sent through by the applicant on 17th September 2024, NELC are not in agreement that this is not a material consideration. Whilst we are happy to continue discussions on the site locations, we must strongly emphasise our road safety concerns, as outlined in the attached.

I would also state that whilst other locations have been agreed in principle from NELC, this will be subject to full designs for these junctions and would request as part of the SoCG that it is stated all designs must be submitted to the LPA prior to works commencing (to include full designs/ construction details/traffic management arrangements/etc).

I would also reiterate the concerns we have previously raised regarding the existing farm track that falls just South of location 12AA, which was subsequently removed from your proposed locations. As stated in our meeting on Monday 16th September 2024 we have noticed that there have been various vehicles utilising this track to undertake what appears to be survey works on the land and we would continue to express our road safety concerns at this location.

Heritage and Conservation;

The supplementary information provided by the applicant has been reviewed by the Heritage Officer and the following comments have been provided;

The final wording for the Statement of Common Ground is agreed. However, I feel the response should be 'Agreed but not material' as although I am happy with this wording it does not/cannot

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assess the archaeology until the trial trenching report is finished in December and there are still changes that are required that haven't been made to the DAMS (which is why it is interim).

However ideally evaluation is completely prior to any mitigation strategy being produced, even one at high level. The on-site excavation work, as far as I can assess, is being completed in a well organised methodological way and the short weekly updates which are being produced are very useful in keeping abreast of the progress. This is working very well and would be something that I would wish to use in other long linear schemes.

However, excavation work aside, this scheme has lacked structured contact which is vital in understanding how a project is progressing and the short turnaround times – in this case a 200p+ report with a two weeks turn around for comments is not enough time – and this arrived and expired while I was on leave so I didn't even have the chance to comment on the initial stages – thankfully my curatorial colleagues in other LPAs did. This is not the first time this has happened and expecting LPA staff to turn around large documents with little notice and no considerations for our already full workloads is at best unhelpful and unprofessional.

Other Matters;

Due to the short time frame in which details have been provided by the applicant, the technical consultees have not been able to give this the due care and attention required and therefore are uneasy to agree all the matters as requested. Therefore, the SoCG reflects the position of the Council currently. It must be emphasized that the highways matters are of a significant concern regarding safety.

Conclusion;

In conclusion, North East Lincolnshire Council can confirm that there are specific matters outstanding and these need to be resolved. We would be happy to advise and assist as necessary.