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Your Reference
AN/2023/134197/01-L01

Our Reference
PA/2023/421

Nicola Farr
Sustainable Places
Environment Agency

Planning permission for the construction & operation of a post-combustion carbon capture plant, including carbon dioxide compressor & metering, cooling equipment, stacks, substations, internal roads, partial ditch realignment, new & modified services, connections, internal roads, accesses, maintenance & laydown areas

VPI Power Station, Rosper Road, South Killingholme, DN40 3DZ

Dear Nicola

I write following receipt of the Environment Agency's objection (ref. NA/2019/114688/01-L01) to the above planning application.

The following responds to the points of the Agency's response listed under the section 'Overcoming our objection', as discussed at the meeting attended by VPI Immingham, AECOM and the Environment Agency on 15 May 2023.

As the development is classed as essential infrastructure it is important that this is addressed to ensure the development remains operational and safe in times of flood, as advised in a footnote to table 2 of the PPG (Flood risk and coastal change section, paragraph 079).

The Proposed VPI Development will comprise a post-combustion carbon capture (PCC) plant and associated facilities for capturing CO_2 from two of the gas turbines and two auxiliary boilers at the VPI Immingham CHP Plant. The Proposed Development is necessarily located adjacent to the existing activities that are to be decarbonised (namely the VPI Immingham CHP Plant) and are essentially 'retrofitted' to the CHP Plant. Given the association with the VPI Immingham CHP Plant the PPC is therefore assigned the development flood risk vulnerability classification of 'Essential Infrastructure', as defined in Table 2 of the Planning Practice Guidance (PPG) Flood Risk and Coastal Change due to the association with power generation.

Although classed as 'Essential Infrastructure' there is no requirement for the PCC plant to remain operational should flooding of the site occur. In the unlikely event that a tidal breach flood event does occur, and the site is inundated, it is possible to shut down the PCC plant for the duration of the flood event.

If the CHP Plant itself remains operational during a period of shut down of the PCC plant (e.g. due to a flood or for a maintenance outage), its emissions would be safely emitted to the atmosphere for that period as they are now (without the CO_2 being captured) via the existing stack.

The applicant should provide further information on how the development, in particular the substations, will be designed and built to remain operational during a flood. The scope to raise floor levels for these should be investigated further.

The new sub stations proposed as part of the VPI PCC plant development will only be used to supply power for the PCC plant; no other developments will be dependent on the power supply from these sub stations. As the sub stations will only be providing power to the PCC Plant, should flooding occur and the sub stations become non-operational there would be no impact on any plant or development other than the VPI PCC plant itself. Similar sub-stations on the wider VPI Immingham Site are located on raised, concrete table top to provide mitigation against potential flood events and it is the intention that the proposed PCC plant sub stations will be raised in a similar way.

Yours sincerely,

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