

THE PROJECT, SITE SELECTION AND ALTERNATIVES**THE VPI IMMINGHAM LLP (LAND AT ROSPER ROAD) COMPULSORY PURCHASE
ORDER 2024****DOCUMENT CD 8.19****REBUTTAL STATEMENT OF EVIDENCE**

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Contents	Page
1. INTRODUCTION	3
2. REBUTTAL	3
3. STATEMENT OF TRUTH	5

1 INTRODUCTION

- 1.1 My name is James Beresford-Lambert and I have been an Engineering Manager at VPI Immingham LLP (**"the Acquiring Authority"**) for 4 years.
- 1.2 As the Engineering Manager for the Acquiring Authority on the VPI Carbon Capture Project (**"Project"**), I am responsible for all technical and project delivery aspects of the Project including engineering and design development, program management (to final investment decision (**"FID"**) and execution), quality control, contracting and procurement, risk and interface management, surveys, data management and planning and permitting delivery. My focus is on technical and project delivery aspects rather than commercial matters. I have been engaged on the Project for the last 4 years.
- 1.3 The purpose of my Rebuttal Statement of Evidence is to address the points raised in Mr Wailes' statement of evidence (**CD 8.12**), in relation to safety considerations and to address the points raised throughout Mr Wailes' and Mr Young's statement of evidence (**CD 8.12** and **CD 8.14**) in relation to the extent of land required for the Project. The fact that I have not addressed each point in the Objectors' evidence does not mean that I agree with it.

2 REBUTTAL

Safety and risk of incident during development construction and operation of the plant

- 2.1 The comments from Mr Wailes are misleading in relation to safety aspects of the Project.
- 2.2 VPI will not incorporate equipment at extreme high-pressure (200+ Bar). The normal operating pressure for the CO₂ export will be 150 Bar with a maximum compressor discharge (subject to vendor confirmation) at around 180 Bar. The high pressure components of the Project are located at the Eastern side of the Order Land, the furthest distance possible from the Humber Oil Refinery. The high pressure facilities comprise the high pressure CO₂ compressor and discharge pipework including chilling and metering prior to export to the Viking CCS manifold. The amount of CO₂ within these facilities is actually less than 50 tonnes so the CO₂ released during an incident will be quite small. It should be noted that CO₂ inventory is not stored but is constantly exported to the Viking CCS pipeline. When the plant is not operating the CO₂ is safely removed from the facilities and pressure reduced to atmospheric via a gradual venting process. A 40m high vent is located in the southern part of the Order Land forming part of the Proposed Development from which the CO₂ is slowly released to ensure no safety issues either on the Order Land or beyond.
- 2.3 There is significantly less risk from CO₂ leakage from the Project than from the Viking CCS pipeline.
- 2.4 VPI has conducted quantitative risk assessment (QRA) and fire, explosion, gas dispersion, risk analysis (FEGDRA) studies during FEED which are industry

recognized methods for consequence analysis by the Health and Safety Executive. The results do not identify any scenario under which a fire or explosion event can escalate beyond the Order Land.

- 2.5 VPI considers that the P66 CO₂ export line and connection to the Viking CSS pipeline presents a substantially greater risk to VPI's activities than any of VPI's activities towards P66, due to the proximity of that work and the inventory of CO₂ within that export line.
- 2.6 The CHP is indeed a lower tier COMAH site as stated at paragraph 5.3 of Mr Wailes' proof of evidence (**CD 8.12**), due to the storage of distillate fuel on site. However, VPI also manages a high pressure natural gas supply pipeline from Thornton Curtis to the CHP and distribution of natural gas as a fuel throughout the CHP to the gas turbines and auxiliary boiler burners. These hydrocarbons present a greater safety risk than those of CO₂ and could result in major accident hazards including fire and explosion with risk of escalation. There are far greater major accident hazards on the higher tier COMAH Humber Refinery than either the CHP or the Project, with escalation potential that is known, with emergency protocols in place. These existing risks are far greater than those of the Project. The CHP Lease does not have security provisions of the type being sought by P66 in respect of Project.
- 2.7 VPI has over 20 years' experience handling chemicals on the CHP. Neither CO₂ nor amine are classified as hazardous substances under the COMAH Regulations. As such the addition of the Project will not result in a change to the lower tier COMAH rating of the VPI facilities.
- 2.8 Construction risks are similar to any power or process plant development whereby competent parties are selected to manage and execute the works under HSE Construction (Design and Management) Regulations 2015. Works in proximity to third party assets will be assessed and protective measures implemented so as not to adversely impact them. This is normal practice within the UK construction industry.
- 2.9 VPI has recent greenfield project experience with the 50MW gas engine and 300MW open cycle gas turbine projects to the North of the CHP which included construction activities in proximity and a pipe bridge over existing P66 pipelines. The management of construction risk is therefore firmly within VPI's experience and does not require any special provision under its current land agreements.

Extent of land required for the Project

- 2.10 The extent of the Order Land is fully consistent with negotiations with P66 to date when considering both permanent footprint and land required to construct the Project as evidenced in the Land Lease HoT (**Appendix 3** of **CD 8.4** and **Appendix 1** of **CD 8.21**) and planning application documentation (**CD 1.7**).
- 2.11 In terms of what we have discussed with P66 to date for temporary construction land we have always maintained we need as much of the Order Land for as long as possible to enable safe and efficient construction. In fact, the requirement for significant construction land is recognised by the evidence of Mr Young in section 6.5 (**CD 8.14**).

- 2.12 In relation to Mr Young's evidence section 5.2 and Figure 6 (**CD 8.14**), VPI has not seen this allocation of land previously and neither has the referenced pipeline corridor ever been defined. The pipeline corridor has been assumed to be the route around the perimeter of the Southern area of the Order Land as shown in 215005-00703-00-CI-DPP-00013 Rev 2 dated 17/07/2024 Humber Zero FCC FEL2 Civil Layout Drawing P66 HOR/VPI/Harbour Interface Overall Site Masterplan (developed and issued by P66) (**Appendix 7** of **CD 8.2**). Figure 6 is also misleading in that it shows a Harbour Energy T&S area that includes both permanent land and land allocated for construction facilities. The VPI land has not been treated in the same way only showing the permanent footprint of the Project facilities. Figure 6 has never been discussed or agreed with VPI.
- 2.13 The evidence of Mr Young (section 4.13, **CD 8.14**) is addressing the Project permanent footprint only, not taking into account the space which VPI require to construct the plant.
- 2.14 As already stated in the letter sent by Pinsent Masons to Burges Salmon (**CD 4.3**) VPI is willing to offer the pipeline corridor of land or rights in it (whichever P66 prefer) back to P66 following Project completion. Access to the Killingholme Ditch can be provided but irrespective of who owns the freehold, access is necessary for other third parties such as the Internal Drainage Board (IDB) and would not be prevented by VPI. Access can be provided to allow for the extension to the existing pipebridge provided that the works are scheduled so as not to adversely impact the Project construction. An above ground hydrogen pipeline in the corridor around the Order Land perimeter will create safety and construction risk to both VPI and Harbour should it be constructed prior to the VPI and Harbour schemes, and it would be safer and less complex for all parties if this were implemented following completion of the Project.
- 2.15 In the evidence of Mr Wailes (paragraph 8.2, **CD 8.12**) again the VPI requirement for construction land is not acknowledged and reference is only made to the permanent facilities footprint. As P66 have noted in Mr Young's evidence (paragraph 4.7, **CD 8.14**) P66 require double the amount of land (based on the carbon capture project footprint) for construction land for their project - so clearly P66 understands the need for securing enough space for construction purposes to deliver the project. P66 will be aware of VPI's requirement to use the whole of the Order land for construction of the Project, but this seems to have been disregarded in Mr Wailes' evidence.

3 STATEMENT OF TRUTH

- 3.1 This statement of evidence has been prepared and provided for this inquiry by me and I confirm that the facts stated in my proof are either within my own knowledge or, where indicated, reflect the advice that I have received. The opinions that I have expressed represent my true opinion.



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James Beresford-Lambert
Date: 8 May 2025