

Solent CO2 Pipelines Project corridor consultation

New Forest District Council are grateful for the opportunity to comment on the proposed pipeline corridor, and welcome the prospect of proactive further engagement in the coming months.

With the limited amount of engagement and information available to date, the council is not in a position to provide a recommendation on a preferred option at this stage, although note from the consultation website that the two routes to Isle of Wight have been identified as the preferred options. At this stage, the following observations are made to form the basis of further discussions over the coming months:

i. Confirmation on the need for the project.

It is recognised that Carbon Capture and Storage (CCS) offers a means to prevent large emissions to atmosphere of the greenhouse gas Carbon Dioxide from coal and gas fired power stations.

It is also recognised that there are 78bn tonnes of Co2 storage available in the UK and the site proposed for storage associated with this proposal is the only potential store in the English Channel identified by the government. Whilst this is the only project that the council are aware of, there is uncertainty as to whether there are other emerging projects in Dorset that might look to dispose of CO2 to this underwater storage area and thus reduce the benefits being presented by this case because storage capacity is being taken up by others.

Additionally, at this stage the council remains unclear on how sustainability objectives will be met, how the carbon credits will be apportioned and the reliability and safety of this new technology.

ii. Rationale for the selection of consultation corridors and consideration of alternative route corridors.

The council is aware from the consultation material that a number of routes have already been discounted by the applicant, albeit the justification for discounting some routes from further consideration is not clear. There are considered to be additional alternative corridors which merit exploration and consideration. In particular, it is noted that there are no alternative consultation corridors for the land south of Fawley. The council would also be keen to know if a marine only route (with no landfall) has been considered. The council is particularly mindful of its duty to further the statutory purposes of the New Forest National Park and in this context, further consideration should be given to routes that avoid or minimise impacts on the National Park where appropriate.

Based on the limited information presented, including no in-depth ecological information it is recognised that the IOW routes are shorter and terrestrially ecologically less complex than the mainland option. However, that selection may change when further information is available.

The council is also just embarking on a new local plan with a significant need for new development sites based on government targets. The council will want to be sure that any consultation corridors limit the implications for its local plan with particular regard to its potential site selection work and its ongoing programme of delivery and management of recreational mitigation projects.

iii. Air quality, emissions, noise and vibration disturbance.

The potential impact of dust and particulate matter from the construction and decommissioning of the pipeline on local amenity will have to be appropriately assessed in accordance with national guidance and, if required, mitigated. This is likely to be of greater concern in areas in close proximity to local residents and businesses. Furthermore, impact from emissions from construction vehicles would also have to be considered in accordance with national guidance.

The council will need to be assured that the potential human health impacts that may arise due to historically contaminated land, construction related dust emissions, groundwater contamination, vibration disturbance and air pollution would have a negligible to minor public health significance if mitigations are implemented.

It is assumed that transport and emissions related to the general maintenance of the pipeline would be minimal. It would be expected that any such potential impacts are considered and, if necessary, screened out during the application stage. In relation to the operation of the pipeline, there are concerns about the potential generation of truck movements on the A326 for the transportation of carbon to the site and any associated impacts arising from this. This may require further mitigation to be required, albeit no details of transport impacts are currently available for review in this regard.

There are known areas of historic landfill and land uses (particularly within the Lepe corridor) which would require appropriate assessment, consideration and potential remediation in advance of any works. In addition, there is a likelihood that potential land contamination would be identified during the construction phase which would again require appropriate assessment and, if required, action.

It is understood that the CO2 within the pipeline will be transported in liquid form. Clarity on the measures that will be in place to reduce the risk of CO2 leaking from the pipeline and contaminating land and / or ground waters will be sought, including the proposed actions likely if such a situation was to arise.

Once a preferred corridor is identified, the council would be keen to work with Exxon Mobil to understand in greater detail the potential issues arising with regard to contamination, including further investigative studies and risk assessments.

In relation to the construction of the pipeline, the potential impact of noise from the construction of the pipeline on local amenity will have to be appropriately assessed in accordance with national guidance and if required mitigated. This is likely to be of greater concern in areas in close proximity to local residents and businesses. Working hours for the construction of the pipeline would also need to be considered and reviewed by the relevant local planning authority.

Additionally the potential impact of noise from structures associated with the operation of the pipeline, such as the pigging stations, would have to be appropriately assessed in accordance with national guidance and if required mitigated.

iv. Biodiversity and ecology.

Designated Sites.

The plan area for New Forest District Council includes, and is close to, a number of significant environmental designations of international nature conservation importance including:

- the New Forest SAC;
- the New Forest SPA;
- the New Forest Ramsar site;
- Solent and Southampton Water SPA;
- Solent Maritime SAC;
- Solent and Southampton Water Ramsar; and
- Solent & Dorset Coast SPA.

To enable the development to proceed, the Conservation of Habitats and Species Regulations require that appropriate mitigation measures are in place to ensure that the proposed development can take place without a harmful impact on the integrity of protected sites.

Our current Local Plan 2016-2036 Part 1 includes Policy ENV1: 'Mitigating the impacts of development on International Nature Conservation sites'

which sets out the broad approach which will be applied to development to secure appropriate mitigation, management and monitoring measures to ensure no adverse impact on the integrity of such sites. A project such as this would be likely to need to provide its own mitigation to ensure there were no significant residual effects on ecological receptors.

The proposed route corridor may also impact the Solent Wader and Brent Goose network of sites used by over-wintering wading birds and Brent Geese, that functionally support the Solent's Special Protection Areas (SPAs). It will be important that any impacts are identified, and appropriate mitigation put in place.

Environmental Enhancement.

The council would welcome opportunities to discuss options for environmental enhancements and biodiversity net gain through this project which could include, but is not limited to:

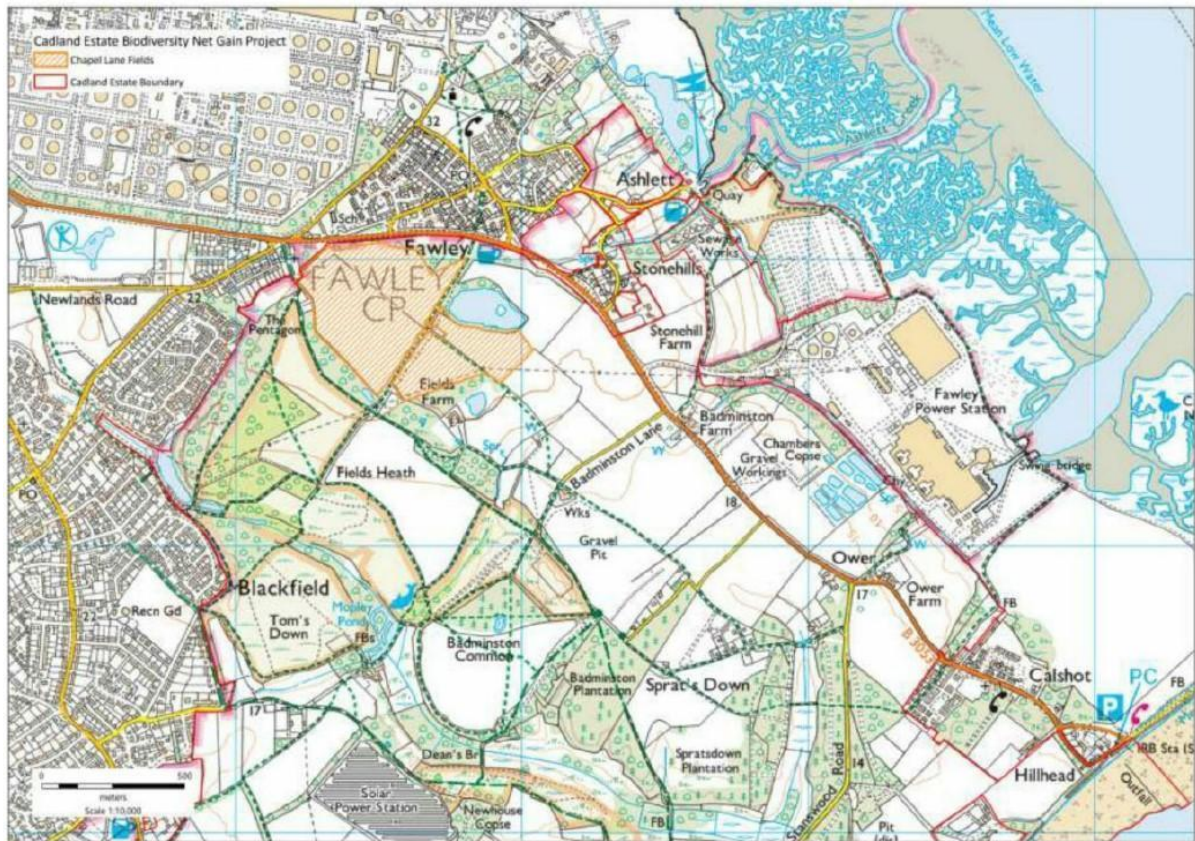
- increased grassland species diversity along field;
- margins and road verges; thin, gappy hedgerows;
- reptile and amphibian refuges would be built; and
- bat roosting habitats

Biodiversity Net Gain Credits.

It is assumed that the project will be captured by mandatory Biodiversity Net Gain (BNG) requirements. There would be a strong request for BNG offsetting to occur near to the point of impact within the same local authority boundary.

The council would request to be kept updated with respect to the applicant's approach to BNG. The council is keen to keep apprised of potential supply and demand for Biodiversity Units which may affect delivery/viability of other projects in the planning area.

The council would also like to highlight a BNG net gain site located immediately adjacent the refinery may be impacted. This is a BNG offset site for application 21/11156.



v. Design, landscape and visual impact.

The council will want to be assured that the development is sustainable and as attractive, durable and adaptable as it can be and that functionality and aesthetics have been taken into account.

Once a corridor has been selected, the council will want to review the landscape and visual impact assessment to ensure that any visual disturbance associated with the pipeline envelope would be limited to the construction phase and temporary in nature and impact.

Part of the consultation corridor for the Mainland route is within the Green Belt where it will be important to ensure that the development meets the test of what constitutes appropriate development, and otherwise seeks to minimise impacts on openness.

The potential impact of lighting from structures associated with the operation of the pipeline (and the impact of lighting from the construction of the pipeline), such as the piggings stations, would have to be appropriately assessed in accordance with national guidance and if required mitigated. This is likely to be of greater concern in areas in close proximity to local residents and businesses.

vi. Flood risk, coastal defence and climate change.

Flood risk and coastal defence.

The council would like to understand in detail the proposed transition from land to sea at the proposed Milford-on-Sea location. This includes any expectation to construct a structure at this point as this could impact on sediment transport.

Beach sediment is an important defence against coastal flooding and erosion. Sediment transport is known to be predominately westward in Christchurch Bay ([16. Hengistbury Head to Hurst Spit \(Christchurch Bay\) Sediment Transport Study 2012 \(scopac.org.uk\)](#)).

If a barrier to sediment transport were to be installed (such as a protective rock revetment) this could have a negative impact on the flood and coastal risk management of areas such as Barton-on-Sea, Milford-on-Sea and Hurst Spit (which itself provides a flood and coastal risk management function).

Therefore, if the Mainland Corridor were to be selected, a thorough assessment of the likely impacts on sediment transport would be needed. The council would suggest the delivery team review the Christchurch Bay Strategy - [Christchurch Bay and Harbour FCERM Strategy 2021-2024 - Poole & Christchurch Bays Flood and Coastal Erosion Risk Management \(twobays.net\)](#) to be aware of risks and future management policies.

The council would highlight that the method of pipeline construction within the marine zone will need to be particularly carefully considered as, if on the seabed (rather than in a trench), there may be issues arising for sediment transport.

There will be a need to consider the southern edge of the offshore area that has an allocated dredging license area crossing from west to east. In the past, material (shingle) has been dredged from areas that are included within the marine corridor. It is likely that these areas will be dredged again in the future to provide beach material for flood and coastal risk management. The pipe would need to be buried deep enough at these locations so that future dredge operations are not impacted.

Coastal monitoring data is available to the delivery team from www.coastalmonitoring.org

Climate Change.

We are committed to tackling the local climate emergency following our declaration of a climate and nature emergency in October 2021. Whilst climate change presents a challenge for us and our residents, through prompt action we can create opportunities and make a difference.

In April 2024, the council adopted the Planning for Climate Change Supplementary Planning Document (SPD). This provides guidance to the planning policies contained in the Local Plan Part One 2016-2036: Planning Strategy (2020). It sets out how developers should address climate change in planning applications in order to meet Local Plan requirements, in particular our policies STR1 and ENV3.

The council will want to work with the development team to ensure that designs are climate change optimised from the earliest opportunity.

vii. Historic environment.

The council will be keen to see the disturbance to archaeological and cultural heritage assets minimised wherever possible. At this stage, very little information is available to inform the potential impacts arising.

Information on the conservation areas, historic parks, gardens and scheduled monuments for the New Forest Planning Area can be found on the council's website. Officers will be keen to review emerging studies and investigations when available over the coming months. Where necessary, it may be appropriate for a requirement to be included in a future DCO to ensure that appropriate measures are in place to protect, record or preserve any significant archaeological remains that may be found.

viii. Land use and safety including future maintenance provisions.

The council is keen to understand how the connections to existing grid and infrastructure along the selected route for power and communications will work.

The council is keen to understand the interrelation with other utilities/infrastructure (and maintenance of those), together with the cumulative impacts to the power needs in the wider area.?

The proposed Mainland Corridor route potentially impacts on a number of mineral safeguarding areas. In this regard, early engagement with Hampshire County Council will be necessary.

ix. Methods of construction and related work areas.

Once the preferred route is known the council will be keen to understand how much of the pipe would be installed using the trenchless approach to understand the impacts on both the environment and noise.

The Council will also be keen to understand the impact of site compounds and temporary traffic routes and any mitigation proposed.

x. Socio-economic benefits and effects including relationship to Freeport.

The council would be keen to understand the socio-economic effects on the **local economy**.

The temporary construction areas, contribution compounds will likely result in general disturbance and in increase on traffic on local roads, plus potential impacts on the Rights of Way network and cycle routes. However, the council understands that having additional people working on building the pipeline could well have a consequent temporary positive impact on expenditure within the local area, albeit primarily during the construction.

Additionally, the council is within the Solent Freeport for which a Full Business Case has been approved by the government and is now in delivery. The outer boundary of the Solent Freeport includes the whole of the New Forest District. Beyond the New Forest, it extends to include Southampton, Portsmouth and the Isle of Wight. The Freeport has no powers in relation to this wider area, its specific economic regulations only apply to tax sites and customs sites. This outer boundary represents the wider economic geography of the Freeport and will be the area within which retained business rates are reinvested (see below). A small part of the Fawley Waterside tax site falls within the boundary of the New Forest National Park.

A successful Freeport will unlock billions of pounds of investment, create thousands of new jobs and will secure the future of the Port of Southampton as a globally important trading hub. At this stage, it is unclear how the proposed project will relate to the Freeport opportunities arising and further clarity is sought in this regard.

xi. Traffic, travel and transportation impacts.

The impacts on the proposed pipeline would need to be considered in the light of an appropriate transport assessment and taking advice of Hampshire County Council as Local Highway Authority. The District Council is keen to be actively engaged in these considerations, including

the extent to which certain provisions of the Highways Act (and related legislation) are proposed to be disapplied through the DCO.

As stated above, the council recognises that during construction there will be a significant increase in workers in the area and would expect the transport assessment to set out the impacts of this.

xii. Water quality and resources.

There will be a need to ensure water quality and water resources to be safeguarded under any DCO, potentially through a requirement for a Water Management Plan and/or Pollution Prevention and Control Plan.

The council would be keen to work with the applicant, Lead Local Flood Authority National Park Authority to understand areas of risk of water pollution from surface water run off, as well as mitigation measures and treatment methodologies (and where they would be applied).

The council will also be keen to understand proposed mitigation measures for works within flood risk areas.

xiii. Progress in seeking agreement/consent with affected landowners.

The council would be keen to understand the progress and consents from landowners in the areas of the consultation corridors.

Additionally, it is noted that there is a 'wayleave' exclusion zone either side of the Mainland Corridor route and potential for sterilisation of land. The council would be keen to see if this wayleave, and route of the pipeline, be used as an opportunity for providing a bridleway/shared pedestrian/cycle route or an enhanced green corridor.

xiv. Extent to which existing powers available to local authorities are proposed to be disapplied and the envisaged future role of the LPA post-decision.

The council would be keen to work proactively on this through the development of a PPA to agree roles and responsibilities.