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7.0 LEGISLATIVE CONTEXT AND PLANNING POLICY

7.1 Introduction

- 7.1.1 This chapter provides an overview of the legislative and policy context that is relevant to the Proposed Development.
- 7.1.2 Section 7.2 details the legislative and decision-making framework set out in the Planning Act 2008 ('2008 Act') (HM Government, 2008), including the primacy of the National Policy Statements ('NPS') and Marine Policy Statements ('MPS'). Section 7.3 provides an overview of the NPS and MPS of most relevance to the Proposed Development.
- 7.1.3 Section 7.4 sets out recent UK Government energy and climate change policy which establishes objectives for decarbonising the power and industrial sectors and the legally binding commitment to achieve 'Net Zero' in terms of greenhouse gas (GHG) emissions by 2050, with the Committee on Climate Change's (CCC) May 2019 Net Zero Technical Report (CCC, 2019) identifying a need for gas-fired electricity generation with Carbon Capture and Storage ('CCS') in order to hit the Net Zero 2050 target. The CCC is an independent, statutory body that was established under the Climate Change Act 2008 in order to advise the UK and devolved governments on emissions targets and to report to Parliament on progress made in reducing GHG emissions and preparing for and adapting to the impacts of climate change.
- 7.1.4 The National Planning Policy Framework ('NPPF') (Ministry of Housing, Communities & Local Government, (MHCLG) 2019a) and local planning policies considered to be of most relevance to the Proposed Development are set out in sections 7.5 and 7.6 respectively. The Proposed Development Site (described in detail in **Chapter 4: The Proposed Development** (Environmental Statement (ES) Volume I – **Application Document Ref. 6.2**) lies within the administrative area of North Lincolnshire Council ('NLC') and section 7.6 identifies the key policies within the NLC Local Development Framework.

7.2 Legislative and Decision-making Framework

- 7.2.1 Elements of the Proposed Development fall within the definition of a Nationally Significant Infrastructure Project ('NSIP') under Section 14(1)(a) and Sections 15(1) and (2) of the 2008 Act, notably the onshore generating station, which will have a generating capacity greater than 50MW. As such, a Development Consent Order ('DCO') is required to authorise this part of the Proposed Development in accordance with Section 31 of the 2008 Act.
- 7.2.2 Integral to the generating station is the Carbon Capture Plant ('CCP') (**Work 1C**) which is installed on the Combined Cycle Gas Turbine (CCGT) (**Work 1A**) and removes carbon dioxide emissions from it. These have a shared cooling system (**Work 1B**).

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- 7.2.3 Section 115 of 2008 Act also states that a DCO can include consent for ‘associated development’, that is, development that is not part of, but is associated with the NSIP. This may be development that supports the construction or operation of the NSIP, which helps to address the impacts of the NSIP or is of a type normally brought forward with the particular type of NSIP (here the generating station). The proposed gas, water and electricity connections would support the operation of the Proposed Development and are considered to be associated development for the purposes of Section 115 of the 2008 Act.
- 7.2.4 Under the 2008 Act, the policy framework for examining and determining applications for a DCO is provided by NPS. Section 5 of the 2008 Act allows the Secretary of State (‘SoS’) to designate NPS setting out national policy in relation to the types of NSIP listed at Section 14 of the 2008 Act.
- 7.2.5 The NPS are the primary policy used by the SoS to examine and determine applications for NSIP. Section 104 of the 2008 Act requires the SoS to determine applications for NSIP in accordance with the relevant NPS unless this would:
- lead to the UK being in breach of its international obligations;
 - be in breach of any statutory duty that applies to the SoS;
 - be unlawful;
 - result in the adverse impacts of the development outweighing the benefits; or
 - be contrary to regulations about how decisions are to be taken.
- 7.2.6 The Energy White Paper (EWP) (UK Government, 2020) states that the Government has
- “decided that it is appropriate to review the NPS, to ensure that they reflect the policies set out in this white paper and that we continue to have a planning policy framework which can deliver the investment required to build the infrastructure needed for the transition to net zero.”*
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- 7.2.7 The EWP confirms that the Government aims to designate updated NPS by the end of 2021. No draft NPS have yet been published for public consultation.
- 7.2.8 While the review is undertaken, the current suite of NPS remains relevant government policy and has effect for the purposes of the 2008 Act. They therefore continue to provide a proper basis on which PINS can examine, and the SoS can make decisions on, applications for development consent. The EWP further states:

"Nothing in this white paper should be construed as setting a limit on the number of development consent orders which may be granted for any type of generating infrastructure set out in the energy NPS."

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7.2.9 The NPS that are considered to be of relevance to the Proposed Development are covered below in Section 7.2

7.2.10 In making decisions on NSIP, the 2008 Act (Section 105) also states that the SoS must have regard to any local impact report submitted by a relevant local authority, any relevant matters prescribed in relation to the Proposed Development and any other matters that the SoS thinks are both 'important and relevant'. In the case of the Proposed Development, other matters that are important and relevant may include recent and relevant UK Government energy and climate change policy including national infrastructure plans and assessments; the Clean Growth Strategy (Department for Business, Energy & Industrial Strategy, (BEIS) 2017); the UK Carbon Capture Usage and Storage (CCUS) Deployment Pathway (Department for Business, Energy & Industrial Strategy, 2018); the EWP (HM Government, 2020a); and the Ten Point Plan (HM Government, 2020b), amongst others). These documents set out important Government objectives for decarbonising the power and industrial sectors, in addition to the Government's target (enshrined in law) of achieving Net Zero in terms of GHG emissions by 2050.

7.2.11 Other matters that the SoS thinks are both important and relevant may include the policies within the NPPF (MHCLG, 2019a), Planning Practice Guidance (PPG) (MHCLG, 2019b) and local development plan documents (DPD).

7.2.12 Each technical chapter of the ES refers to the policies from these NPS that are relevant to the assessment of the environmental effects reported within that chapter.

7.2.13 The UK MPS (Department for Environment, Food & Rural Affairs (Defra), 2011) is the framework for preparing Marine Plans and taking decisions affecting the marine environment. The East Inshore and East Offshore Marine Plans (Defra, 2014) establishes the plan led system for the marine area in which the riverine parts of the Proposed Development Site are located. These are considered further below.

7.3 National Planning Statements (NPS) and Marine Policy Statements (MPS)

7.3.1 As identified above the relevant designated NPS are as follows and while under review, remain valid:

- Overarching NPS for Energy (NPS EN-1) ('EN-1') (DECC, 2011a);
- NPS for Fossil Fuel Electricity Generating Infrastructure (NPS EN-2) ('EN-2') (DECC, 2011b);

- NPS for Gas Supply Infrastructure and Gas and Oil Pipelines (NPS EN-4) ('EN-4') (DECC, 2011c); and
- NPS for Electricity Networks Infrastructure (NPS EN-5) ('EN-5') (DECC, 2011d).

7.3.2 The appropriate marine policy documents are the UK MPS (Defra, 2011) are the East Inshore and East Offshore Marine Plan (Defra, 2014).

7.3.3 These documents, from a planning policy perspective, have been the focus in terms of scoping the EIA, as reported on in the EIA Scoping Report (**Appendix 1A**, ES Volume II – **Application Document Ref. 6.3**).

Overarching National Policy Statement for Energy (NPS EN-1)

7.3.4 Part 2 of EN-1 sets out '*Government policy on energy and energy infrastructure development*'. It confirms the following:

- the Government's commitment to meet its (then) legally binding target to cut GHG emissions by at least 80% by 2050 compared to 1990 levels;
- the need to affect a transition to a low carbon economy so as to reduce GHG emissions; and
- the importance of maintaining secure and reliable energy supplies as older fossil fuel generating plant closes as a result of the European Union Emissions Trading System ('EU ETS') and the UK moves toward a low carbon economy.

7.3.5 Part 3 of EN-1 sets out the need for nationally significant energy infrastructure. Paragraph 3.1.1 states that the UK '*needs all the types of energy infrastructure covered by this NPS in order to achieve energy security*' and that the '*Government does not consider it appropriate for planning policy to set targets for or limits on the different technologies*' (Paragraph 3.1.2). The EWP also states that the Government "are not targeting a particular generation mix for 2050, nor would it be advisable to do so" (HM Government, 2020a).

7.3.6 Paragraph 3.1.3 of EN-1 stresses that the SoS should assess applications for DCO for the types of infrastructure covered by the energy NPS on the basis that the Government has demonstrated that there is a need for those types of infrastructure and that the scale and urgency of that need is as described for each of them. Paragraph 3.1.4 confirms that the SoS should give substantial weight to the contribution that all projects would make toward satisfying this need when considering applications under the 2008 Act.

7.3.7 Section 3.3 of Part 3 of EN-1 sets out why the Government believes that there is an urgent need for new electricity infrastructure, including:

- meeting energy security and carbon reduction objectives – all types of energy infrastructure covered by the NPS are needed to achieve energy security in the UK at the same time as reducing GHG emissions;
- the need to replace closing electricity generating capacity – at least 22 gigawatts (GW) of existing electricity generating capacity will need to be replaced in the coming years, as a result of ageing power stations and tightening environmental regulation. Additionally, 10GW of nuclear generating capacity is expected to close over the next 20 years (from 2011);
- the need for more electricity capacity to support the increased supply from renewable sources – decarbonisation of electricity generation is reliant on a dramatic increase in the amount of renewable energy; however, many renewable sources (such as wind, solar and tidal) are intermittent and cannot be adjusted to meet demand. Furthermore, EN-1 recognises that there will still be a role for fossil fuel generation to provide a cost-effective means of ‘back up’ electricity generation at short notice to support renewable technologies; and
- future increases in electricity demand – the demand for electricity is expected to increase and total electricity consumption could double by 2050. Depending upon the choice of how electricity is supplied, total capacity may need to more than double to be sufficiently robust to all weather conditions.

7.3.8 Paragraph 3.3.15 states the urgency at which new energy infrastructure should be brought forward as soon as possible and certainly within the next 10-15 years (from 2011).

7.3.9 Paragraphs 3.6.4 - 3.6.7 explains the role CCS can have in meeting emissions targets while maintaining security of supply, as CCS has the potential to reduce carbon emissions by 90%. Paragraph 3.6.4 notes the uncertainty about the future deployment of CCS in the economy, which can be resolved by demonstrating CCS at commercial scale.

7.3.10 Paragraph 3.6.5 notes the Government is supportive of commercial scale demonstration projects which are a priority for UK energy projects. The projects are intended to demonstrate the full chain of CCS involving the capture, transport and storage of carbon dioxide in the UK. Paragraph 3.6.5 states the examining authority *“should take account of the importance the Government places on demonstrating CCS, and the potential deployment of this technology beyond the demonstration stage, in considering applications for consent of CCS projects and associated infrastructure”*.

7.3.11 In order to support the delivery of CCS policy, the Government has placed a condition on the consenting of new fossil fuel generating stations (EN-1, Paragraph 3.6.6); that all commercial scale (at or above 300MWe) combustion generating stations have to be constructed to be Carbon Capture Ready (‘CCR’).

7.3.12 Paragraph 3.6.8 again emphasises the need for new fossil fuel generation to provide back-up to renewable generating capacity and to help with the transition to low carbon electricity generation:

“It is important that such fossil fuel generating capacity should become low carbon, through development of CCS, in line with carbon reduction targets. Therefore, there is a need for CCR fossil fuel generating stations and the need for the CCS demonstration projects is urgent.”

7.3.13 Section 3.8 of EN-1 ‘The need for nationally significant gas infrastructure’ is relevant as it highlights (paragraph 3.8.1) that although the UK’s reliance on fossil fuels will fall, the transition will take some time, and gas will continue to play an important part in the country’s fuel mix for some years to come. The continued need for gas-fired generation to form part of the energy mix, albeit with CCS, in order to ensure security and flexibility of electricity supplies, is recognised in more recent government policy, notably the EWP, (HM Government, 2020a).

7.3.14 Part 4 of EN-1 sets out a number of ‘assessment principles’ that must be taken into account by applicants and the SoS in preparing and determining applications for nationally significant energy infrastructure. General points include (Paragraph 4.1.2) the requirement for the SoS, given the level and urgency of need for the infrastructure covered by the energy NPS, to start with a presumption in favour of granting consent for applications for energy NSIP. This presumption applies unless any more specific and relevant policies set out in the relevant NPS clearly indicate that consent should be refused or any of the considerations referred to in Section 104 of the 2008 Act (noted above) apply. In relation to the Proposed Development, there is no conflict with relevant policies in the NPS and none of the considerations set out in Section 104 of the 2008 Act apply.

7.3.15 Paragraph 4.1.3 goes on to state that in considering any project, and in particular, when weighing its adverse impacts against its benefits, the SoS should take into account:

- its potential benefits, including its contribution to meeting the need for energy infrastructure, job creation and any long-term or wider benefits; and
- its potential adverse impacts, including any long-term and cumulative adverse impacts, as well as any measures to avoid, reduce or compensate for any adverse impacts.

7.3.16 Paragraph 4.1.4 continues by stating that within this context, the SoS should take into account environmental, social and economic benefits and adverse impacts, at national, regional and local levels.

7.3.17 Other assessment principles include the matters to be covered within any ES; the Conservation of Habitats and Species 2017 Regulations (as amended) (HM Government, 2017); the consideration of alternatives; criteria for ‘good design’;

consideration of combined heat and power (CHP); consideration of CCS and CCR; climate change adaptation; and grid connection, amongst others.

7.3.18 Paragraph 4.7.4 states that the Government has taken a number of steps to facilitate and encourage the demonstration of CCS technology and that the demonstration programme was extended to include gas-fired generating stations.

7.3.19 Paragraph 4.7.7 states that the most likely method for transporting captured carbon dioxide is through pipelines that will be located both onshore and offshore. It notes that there are currently no carbon dioxide pipelines in the UK and considerable future investment in pipelines will be required for the purpose of the demonstration programme.

7.3.20 Paragraph 4.7.10 states that:

“to ensure that no foreseeable barriers exist to retrofitting carbon capture and storage (CCS) equipment on combustion generating stations, all applications for new combustion plant which are of generating capacity at or over 300MW and of a type covered by the EU’s Large Combustion Plant Directive (LCPD) should demonstrate that the plant is ‘Carbon Capture Ready’ (CCR) before consent may be given.”

7.3.21 Paragraph 4.7.10 therefore does not envisage the inclusion of carbon capture equipment within new power developments at this stage, however, this Proposed Development does include a CCP. Indeed, the Proposed Development is one of the enabling projects for the wider deployment of CCS on a regional scale, linking to the proposed ZCH Partnership and NEP carbon capture and storage cluster for Humberside and Teesside.

7.3.22 Part 5 of EN-1 lists a number of ‘generic impacts’ that relate to most types of energy infrastructure, which both applicants and the SoS should take into account when preparing and considering applications. These include air quality and emissions; biodiversity; landscape and visual; and flood risk impacts, amongst others. Paragraph 5.1.2 stresses that the list of impacts is not exhaustive, and that applicants should identify the impacts of their projects in the ES in terms of both those covered by the NPS and others that may be relevant. In relation to each of the generic impacts listed within Part 5 of EN-1, guidance is provided on how the applicant should assess these within their application and also the considerations that the SoS should take into account in decision-making.

[National Policy Statement for Fossil Fuel Electricity Generating Infrastructure \(NPS EN-2\)](#)

7.3.23 EN-2 confirms the vital role fossil fuel generating stations will play in providing reliable electricity supplies and a secure and diverse mix as the UK makes its transition towards a secure decarbonised electricity system. It also restates

from EN-1 (DECC, 2011a) the Government policy that all new generating stations should be required to capture and store the carbon emissions from a substantial proportion of their capacity.

7.3.24 EN-2 confirms at Paragraph 2.3.4 that the SoS should not give development consent for new combustion generating stations with a generating capacity at or over 300MW unless it is satisfied that the proposed development meets all the criteria for CCR set out in EN-1. The Proposed Development in this case exceeds the minimum CCR requirements in that design, sizing and assessment of a CCP has been undertaken as part of the development proposals and the plant will not be built without the CCP as the Applicant is fully committed to building a generating station which has a clear route to decarbonisation.

7.3.25 Section 2.4 acknowledges the impacts of fossil fuel generating stations, as set out in the generic impacts identified in Part 5 of EN-1, providing additional detail on air emissions, landscape and visual, noise and vibration, water quality and resources, amongst others.

UK Marine Policy Statement (MPS)

7.3.26 The MPS (Defra, 2011) is the framework for preparing Marine Plans and taking decisions affecting the marine environment. It establishes a vision for the marine environment, which is for 'clean, healthy, safe, productive and biologically diverse oceans and seas'. The MPS underpins the process of marine planning, which establishes a framework of economic, social, and environmental considerations that will deliver these high level objectives and ensure the sustainable development of the UK marine area. While the Proposed Development does not directly affect the wider marine environment, some temporary activities (Work 10B) and permanent minor components (parts of Works 4B and 5) of the Proposed Development are proposed within the estuarine waters of the river Trent and therefore the MPS needs to be considered.

7.3.27 Relevant high level marine objectives relevant to the Proposed Development include:

- achieving a sustainable marine economy:
 - infrastructure is in place to support and promote safe, profitable and efficient marine businesses.
- ensuring a strong, healthy and just society:
 - people appreciate the diversity of the marine environment, its seascapes, its natural and cultural heritage and its resources and act responsibly;
 - the use of the marine environment is benefiting society as a whole, contributing to resilient and cohesive communities that can adapt to

coastal erosion and flood risk, as well as contributing to physical and mental wellbeing;

- the coast, seas, oceans and their resources are safe to use;
 - the marine environment plays an important role in mitigating climate change; and
 - there is equitable access for those who want to use and enjoy the coast, seas and their wide range of resources and assets and recognition that for some island and peripheral communities the sea plays a significant role in their community.
- living within environmental limits:
 - biodiversity is protected, conserved and where appropriate recovered and loss has been halted.

7.3.28 Chapter 3 of the MPS sets out sectoral issues, such as defence and national security, ports and shipping, and marine aggregates. A recognised sector is energy production and infrastructure development (3.3). It is acknowledged that the UK offshore area is considered to be one of the most promising locations anywhere in the world to permanently store carbon dioxide (Paragraph 3.3.31).

7.3.29 The East Inshore and East Offshore Marine Plans (Department for Environment, Food and Rural Affairs, 2014) establishes the plan led system for the marine area in which the riverine parts of the Proposed Development Site are located.

7.3.30 In section 2, the vision and objectives for the East marine plan areas is stated. The vision (page 23) comprises:

“By 2034, sustainable, effective and efficient use of the East Inshore and East Offshore Marine Plan Areas has been achieved, leading to economic development while protecting and enhancing the marine and coastal environment, offering local communities new jobs, improved health and well-being. As a result of an integrated approach that respects other sectors and interests, the East marine plan areas are providing a significant contribution, particularly through offshore wind energy projects, to the energy generated in the United Kingdom and to targets on climate change.”

7.3.31 Section 3 comprises the plan policies. Key policies include:

- Policy EC1: *“Proposals that provide economic productivity benefits which are additional to Gross Value Added currently generated by existing activities should be supported.”;*
- Policy EC2: *“Proposals that provide additional employment benefits should be supported, particularly where these benefits have the potential to meet employment needs in localities close to the marine plan areas.”;*

- Policy SOC3, which requires that proposals that affect the terrestrial or marine character of an area firstly avoid, or then mitigate, or then justify, these effects;
- Policy BIO1, which requires appropriate weight should be attached to biodiversity, using an evidence based approach;
- Policy BIO2, which requires that where appropriate, proposals for development should incorporate biodiversity and geological enhancement;
- Policy CCS1, which seeks to ensure that sufficient offshore storage sites are available for CCS over the long term in view of the importance of the East marine areas to England's CCS potential;
- Policy CCS2, which requires CCS proposals to demonstrate consideration of the re-use of existing oil and gas infrastructure rather than the installation of new infrastructure;
- Policy CC1, which requires proposals to incorporate climate change mitigation and adaptation, and minimise impacts on adaptation and mitigation measures;
- Policy CC2, which requires the minimisation of GHG emissions; and
- Policy PS3, which requires that proposals firstly avoid, or then mitigate, or then justify, interfering with current and future port and harbour expansion opportunities.

7.3.32 Section 3.11 'Carbon Capture and Storage' recognises that combustion (e.g., gas-fired) power stations *"may want to utilise coastal or estuarine sites within the East inshore plan area to make use of once through water cooling systems for efficiency and economic purposes,"* (Paragraph 325).

7.3.33 Paragraph 326 recognises that:

"The East marine plan areas afford a significant opportunity for the industry due to the large number of saline aquifers within the Bunter sandstone formation. Saline aquifers are estimated as having around 85% of the United Kingdom's potential storage capacity. Also, there are significant active and inactive hydrocarbon fields that could be used for storage. In addition, several clusters of industrial facilities emitting large amounts of carbon dioxide occur along England's East coast."

7.3.34 While the Proposed Development does not include any offshore transport or storage infrastructure – that being developed by the NEP –this demonstrates that the wider CCS aspirations for the ZCH are consistent with the MPS.

7.4 Other Matters that may be 'Important and Relevant'

- 7.4.1 In making decisions on applications for NSIP, Section 104 of the 2008 Act states that the SoS must also have regard to any other matters that they consider to be both 'important and relevant' to their decision.
- 7.4.2 A body of recent energy and climate change law, policy, and guidance is of potential relevance and is described below. Collectively, these provide further support to the urgent need for new energy infrastructure, including carbon capture equipped power stations, set out in EN-1, providing energy security and enabling the development of CCUS clustering in support of a net zero economy.
- 7.4.3 Paragraph 4.1.5 of EN-1 provides some clarification on the other matters that the SoS may consider both important and relevant, such as national planning policy and local plan documents. These are covered below in Sections 7.5 and 7.6.

[The Energy White Paper – Powering our Net Zero Future \(HM Government, 2020a\)](#)

- 7.4.4 The EWP was presented to Parliament in December 2020 and builds on the Prime Minister's Ten Point Plan for a Green Industrial Revolution (HM Government, 2020), which is discussed below. At the core of the EWP is the commitment to achieve Net Zero and tackle climate change. The EWP seeks to put in place a strategy for the wider energy system that transforms energy, supports a green recovery and creates a fair deal for consumers (page 4). As with the Ten Point Plan, the EWP confirms the Government's support for CCUS (drawing upon the resource provided by the North Sea) and new hydrogen technologies.
- 7.4.5 The Government estimates (Introduction, page 15) that the measures in the EWP could reduce emissions across power, industry and buildings by up to 230 million tonnes of carbon dioxide (Mt CO₂e) in the period to 2032 and enable further savings in other sectors such as transport. In doing so, these measures could support up to 220,000 jobs per year by 2030. These figures include the energy measures from the Ten Point Plan as well as additional measures set out in the EWP. However, the EWP recognises that more will need to be done to meet key milestones on the journey to Net Zero.
- 7.4.6 The EWP (pages 16 - 17) provides an overview of the Government's key policies and commitments to put the UK on the course to Net Zero. These are grouped under a number of headings, including 'Transform Energy', 'Support a Green Recovery from Covid-19' and 'Creating a Fair Deal for Consumers'. Those of particular relevance to the Proposed Development are as follows:

Transform Energy

- *“Supporting the deployment of CCUS in four industrial clusters including at least one power CCUS project, to be operational by 2030 and putting in place the commercial frameworks required to help stimulate the market to deliver a future pipeline of CCUS projects”.*

Support a Green Recovery from COVID-19

- *“Increasing the ambition in our Industrial Clusters Mission four-fold, aiming to deliver four low-carbon clusters by 2030 and at least one fully net zero cluster by 2040.*
- *Investing £1 billion up to 2025 to facilitate the deployment of CCUS in two industrial clusters by the mid-2020s, and a further two clusters by 2030, supporting our ambition to capture 10Mt CO₂e per year by the end of the decade.”*

7.4.7 Chapter 2 of the EWP deals with ‘Power’ with the stated goal being to use electricity to enable the transition away from fossil fuels and decarbonise the economy cost-effectively by 2050. Figure 3.2 ‘Electricity demand, Net Zero scenarios’ (page 42) highlights how electricity demand could double by 2050 as electricity replaces the use of petrol and diesel in transport and to some extent, gas for heating. This would require a four-fold increase in clean electricity generation with the decarbonisation of electricity being required to underpin the delivery of the Net Zero target.

7.4.8 Despite the push to increase clean electricity generation and decarbonise the power sector, the EWP states that the Government is not targeting a particular generation mix by 2050 and its view remains that the electricity market should determine the best solutions for very low emissions and reliable supply, at a low cost to consumers (page 42). While the EWP (page 43) states that a low-cost, net zero consistent system is likely to be composed predominantly of wind and solar, in order to ensure the system is reliable, it needs to be complemented by technologies which provide power, or reduce demand, when the wind is not blowing, or the sun does not shine. This includes gas with CCS and short-term dispatchable generation providing peaking capacity, which can be flexed as required.

7.4.9 Figure 3.4 of the EWP (page 44) details different potential electricity mixes to 2050 and it is notable that gas with CCS is an important component of those mixes. Furthermore, linked to the commitment to support the deployment of at least one power CCUS project, the EWP (page 47) recognises that:

“In the power sector, gas-fired generation with CCUS can provide flexible, low-carbon capacity to complement high levels of renewables. These characteristics mean that deployment of power CCUS projects will play a key role in the decarbonisation of the electricity system at low cost.

We will support at least one power CCUS plant to come forward and be operational by 2030 and will put in place a commercial framework which will enable developers to finance the construction and operation of a power CCUS plant and stimulate a pipeline of projects. This will enable at least one power CCUS project to be developed in one of the four industrial clusters as part of our mission to decarbonise them ...”

7.4.10 Chapter 3 ‘Energy System’ of the EWP addresses ‘The Role of Natural Gas’ in a Net Zero world (page 84). It confirms that natural gas currently represents almost 30% of final energy consumption and 40% of electricity generation (page 84) and notes that we will continue to rely on natural gas for some years, even as we work to largely eliminate carbon emissions from the energy system, including those from gas. It goes on to state:

“We will therefore make sure the natural gas markets and networks evolve in a way which enables continued investment and ensure secure supplies but also promotes the use of low-carbon options, wherever possible. This will reduce emissions now and help build the networks of the future which will need to accommodate technologies such as hydrogen and Carbon Capture, Usage and Storage. We will need investment in the gas network to support the ambition set out in the Prime Minister’s Ten Point Plan for a potential Hydrogen Town before the end of the decade.”

7.4.11 The challenge of decarbonising industry is covered at Chapter 5 ‘Industrial energy’ of the EWP, in particular, the need for emissions from industry to fall by around 90% from today’s levels by 2050 if the Net Zero target is to be met (page 118). The EWP (page 120) highlights how about half of all emissions from manufacturing and refining are concentrated in the UK’s major industrial clusters (EWP Figure 8.1). These ‘hubs’ are seen as critical drivers of local and regional economic activity and a vital component of the UK’s national economy. It goes on to state (page 122):

“Improved efficiency in the energy performance of buildings and industrial processes will lay the groundwork for the transformation of industrial energy. But we cannot rely on energy efficiency alone to reduce emissions in line with our 2050 goal. Manufacturing industry will need to capture their carbon for onward storage and switch from using fossil fuels to low-carbon alternatives.”

7.4.12 The EWP notes (page 124) that many clusters are located in regions in need of economic revitalisation and that decarbonising those clusters can act as a driver of prosperity for the surrounding areas. Furthermore, that investments in key technologies like CCUS will be crucial to enhancing local economic growth and creating jobs together with prosperity.

7.4.13 CCUS is dealt with in detail at pages 125 and 126 of the EWP. The EWP confirms that the deployment of CCUS is fundamental to the decarbonisation of energy intensive industries such as steel, cement, oil refining and chemicals. It highlights the role of CCUS in helping to secure the long-term future of these

industries and enabling the production of low-carbon hydrogen at scale. It reaffirms the Government's commitment to invest £1 billion (up from the £800m promised in the CCS Infrastructure Fund) up to 2025 to facilitate the deployment of CCUS in two industrial clusters by the mid-2020s, and a further two clusters by 2030, supporting its ambition to capture 10Mt CO₂ emissions per year by the end of the decade. It stresses how the UK is in a strong position to become a global technology leader in CCUS, with the potential to store 78 billion tonnes of carbon dioxide. It recognises that deployment of CCUS could create new markets for UK businesses, at home and abroad, as other countries look to meet their emissions reduction commitments and could support 50,000 jobs in the UK by 2030.

7.4.14 The important supporting role of CCUS in the production of clean hydrogen is underlined at pages 127 and 128 of the EWP.

7.4.15 The Proposed Development would clearly help deliver key Government policies and commitments on CCUS set out in the EWP (HM Government, 2020).

National Infrastructure Plans & Assessments

National Infrastructure Plan (HM Treasury, 2014)

7.4.16 The National Infrastructure Plan (HM Treasury, 2014) (the 'NIP 14') sets out a vision for the UK's infrastructure, reinforcing the Government's commitment to investing in infrastructure and improving its quality and performance.

7.4.17 Chapter 1 of the NIP 14 sets out the Government's strategy for infrastructure. Paragraph 1.1 emphasises the strong case for infrastructure investment and that this has a significant positive effect on output, productivity, and growth rates, being a key driver for jobs throughout the economy. The Executive Summary highlights the economic benefits of infrastructure investment, including:

- for every £1 billion spent on infrastructure investment, 5,000 construction jobs could be supported as well as many more indirectly in design, engineering and planning; and
- for every £1 spent on infrastructure construction there is an increase of £2.84 in overall economic activity.

7.4.18 Chapters 3 to 13 of the NIP 14 deal with different infrastructure sectors. Chapter 8 deals with 'Energy'. It reports on the progress made since 2010, with 20GW of new electricity capacity created (enough for 23 million homes), much of it being low carbon or renewable. However, a key objective of the NIP 14 in terms of energy investment (paragraph 8.1) is to "...reduce carbon emissions in order to mitigate climate change and meet legally binding targets."

7.4.19 Paragraph 8.3 states that large-scale investment in gas and low-carbon electricity generation is vital in order to replace ageing energy infrastructure,

maintain secure energy supplies and meet legally binding environmental targets. Around £100 billion of investment is estimated to be required in electricity generation and networks by 2020. Paragraph 8.5 continues:

“As legacy coal, gas and nuclear power stations come offline, they will increasingly be replaced with a combination of renewable energy, new nuclear power and fossil fuel power stations fitted with Carbon Capture and Storage (CCS) technology. New gas plant is also needed as a vital backup for less flexible renewable generation and to ensure that the system can meet peak electricity demand. Demand for gas to supply heat to homes and businesses will also remain significant for some time to come.” [underlining added]

7.4.20 The NIP 14 therefore recognises the continuing need for new gas-fired power stations to provide back-up to less flexible renewable generation. The provision of such infrastructure is critical to ensure that the National Grid Electricity Transmission System can meet peak electricity demand as the amount of renewable generation increases. The clear inference though is that for fossil fuel power stations to remain part of the energy mix in the long-term, they should be fitted with CCS technology if that can be shown to be commercially viable.

7.4.21 At paragraph 8.28 the NIP 14 sets out the Government’s Top 40 ‘Priority Investments’ to support its objectives for the energy sector. Alongside increased generation from renewables and new nuclear these include more electricity generation from gas and the deployment of carbon capture and storage.

7.4.22 The Proposed Development would contribute to the delivery of the NIP 14 and in particular the Government’s objectives for the energy sector through the deployment of a new gas-fired power station that is fitted with CCS technology. The Proposed Development would assist with moves to decarbonise the power sector, while ensuring the security of electricity supplies and supporting the continued deployment of renewables.

National Infrastructure Delivery Plan 2016-2021 (Infrastructure and Projects Authority, 2016)

7.4.23 The National Infrastructure Delivery Plan (2016 - 2021) (the ‘NIDP’) was published in March 2016 by the Infrastructure and Projects Authority reporting to HM Treasury and Cabinet Office and builds upon the NIP 14 and brings together the Government’s plans for economic infrastructure over a five-year period (2016 - 2021) with those to support the delivery of housing and social infrastructure. The Executive Summary (page 7) states that:

“This is reflected by the government’s commitment to invest over £100 billion by 2020-21, alongside significant ongoing private sector investment in our infrastructure.”

7.4.24 The NIDP (Chapter 1, paragraphs 1.3 - 1.4) highlights the importance of establishing the right framework to deliver infrastructure. This means having organisations with a clear purpose and clear responsibilities that can work together to plan the development of UK infrastructure. It goes on to state:

“1.3 ... To support this, the government has set up 2 new bodies – the Infrastructure and Projects Authority and an independent National Infrastructure Commission – to ensure the right infrastructure projects are identified and delivered successfully.

1.4 These organisations are complementary and together will ensure a comprehensive approach to infrastructure planning across both the relatively short term (to 2020-21) and the very long terms (to 2050), through the National Infrastructure Assessment.”

7.4.25 Chapter 5 of the NIDP deals with ‘Energy’ and sets out the key projects and programmes in this sector over the period 2016 - 2021 (paragraph 6.28). It identifies the continuing importance of gas in heating our homes (and that UK gas supplies are amongst some of the cheapest and most secure in Europe) and the need for new high efficiency Combined Cycle Gas Turbine (CCGT) technology to come forward.

National Infrastructure Assessment (The National Infrastructure Commission, 2018)

7.4.26 The National Infrastructure Commission (the ‘NIC’) was established in 2015 to provide independent, impartial advice on the UK’s long-term infrastructure needs.

7.4.27 In the National Infrastructure Assessment (the ‘NIA 18’), published in July 2018, the NIC has looked across different infrastructure sectors and come to independent conclusions based on the best available evidence. The foreword to the NIA 18 (page 3) confirms that it sets out a clear, long term strategy for the UK’s economic infrastructure from 2020 to 2050, providing long term clarity for industry and the supply chain.

7.4.28 The NIA 18 sets out a number of recommendations (page 5) and the Government has committed to respond to the NIC’s recommendations and to adopt agreed recommendations as government policy. One of the key themes is ‘Low cost, low carbon’ with the NIA 18 stating (page 9) that the UK can and should have low cost and low carbon electricity, heat and waste.

[Net Zero - Opportunities for the power sector \(National Infrastructure Commission, 2020\)](#)

7.4.29 In March 2020, the NIC published a report entitled ‘Net Zero - Opportunities for the power sector’ (the ‘Net Zero Report’), in order to update the modelling, assumptions and recommendations in the NIA 18 and respond to the

Government's decision in June 2019 to legislate for a Net Zero GHG emissions target for the whole economy by 2050, via the Climate Change Act 2008 (2050 Target Amendment) Order 2019 (HM Government, 2019).

- 7.4.30 The Net Zero Report details work that looks at the total electricity costs of delivering a Net Zero compatible electricity system by 2050. Two different electricity demand scenarios are examined. One involves the electrification of heating and the other hydrogen for heating. Additionally, the Net Zero Report considers the impact that either hydrogen or bioenergy could have if deployed in the power sector (Executive Summary - page 7).
- 7.4.31 The Net Zero Report explains that since NIA 18 and the Government's Net Zero Target, reductions in the cost of renewables have outstripped forecasts, and that its analysis reaffirms the case for the Commission's recommendation in NIA 18 to deliver at least 50 per cent renewable generation by 2030 as part of the transition to a highly renewable generation mix.
- 7.4.32 The NIC's analysis of 2050 generation and capacity mixes states that the same technologies as set out in NIA 18, and in broadly similar quantities, are still likely to be needed in the long term. This includes at least 18 GW of gas with CCS capacity needed by 2050 across all scenarios. The Net Zero Report notes that by 2050, gas will primarily play a peaking role in the electricity generating system and that residual emissions from not capturing 100% of the carbon dioxide are likely to limit its role in providing bulk baseload generation in a Net Zero power system, unless high capture rates are achieved (pages 18 - 19 including Figures 5 and 6).
- 7.4.33 'Net Zero – Opportunities for the power sector' therefore highlights the important role of CCS in decarbonising the power sector by capturing carbon dioxide from new gas-fired generation.

Clean Growth Strategy

- 7.4.34 The 'Clean Growth Strategy – Leading the way to a low carbon future' (Department for Business, Energy & Industrial Strategy, 2017) ('the CGS') sets out the aims of the Government to deliver increased economic growth while reducing carbon emissions. It estimates that the low carbon economy could grow 11% per year between 2015 and 2030, four times faster than the projected growth of the economy as a whole.
- 7.4.35 The Executive Summary (page 9) confirms that for the UK to achieve its fourth and fifth carbon budgets (2023 - 2027 and 2028 - 2032) it will be necessary to drive a significant acceleration in the pace of decarbonisation. The Executive Summary (pages 12-16) also sets out a number of key policies and proposals relating to 'Improving Business and Industry Efficiency'. These include to:

"4. Publish joint industrial decarbonisation and energy efficiency action plans with seven of the most energy intensive industrial sectors;

5. Demonstrate international leadership in carbon capture usage and storage (CCUS), by collaborating with our global partners and investing up to £100 million in leading edge CCUS and industrial innovation to drive down costs.

6. Work in partnership with industry, through a new CCUS Council, to put us on a path to meet our ambition of having the option of deploying CCUS at scale in the UK, and to maximise its industrial opportunity.

7. Develop our strategic approach to greenhouse gas removal technologies, building on the Government's programme of research and development and addressing the barriers to their long-term deployment."

7.4.36 Chapter 3 (page 47) of the CGS sets out the Government's approach and states:

"...we must create the best possible environment for the private sector to innovate and invest. Our approach will mirror that of our Industrial Strategy: building on the UK's strengths ...; improving productivity across the UK; and ensuring we are the best place for innovators and new business to start up and grow. We are clear about the need to design competitive markets and smart regulation to support entrepreneurs and investors who will develop the new technologies at the scale we need.

... we are laying the groundwork for major decisions in the areas where we face greatest uncertainty and challenge: in how we work with industry to make carbon capture, usage and storage (CCUS) a viable future option."

7.4.37 Page 49 of the CGS goes on to state that:

"We want to use the power of Government to support innovation in a low carbon economy using all the tools available to us, including market design, taxation and regulation, as well as investment in our education systems, our science base and innovative companies. Our aim is to become one of the best places in the world for low carbon innovation."

7.4.38 Chapter 3 of the CGS 'Our Clean Growth Strategy' sets out the various projects that have been announced as part of the 'BEIS Energy Innovation Programme' (Department for Business, Energy & Industrial Strategy, 2017) (page 50). This includes up to £20 million of investment in a carbon capture and utilisation demonstration (CCUD) programme.

7.4.39 The Proposed Development would accord with the Government's approach set out above, in particular, removing uncertainty and working with industry to make CCUS a viable option.

7.4.40 Chapter 4 of the CGS deals with different sectors of the UK economy. Pages 61-71 deal with 'Improving Business and Industry Efficiency and Supporting Clean Growth'. Page 62 confirms that business and industry account for approximately 25% of the UK's emissions and 50% of its electricity use. This

section of Chapter 4 sets out various policies and proposal to increase energy efficiency on business and industry. However, it is acknowledged (page 64) that energy intensive industries will require steps beyond energy efficiency:

“Out to 2030, this will require industry to make progress in switching from fossil fuel use to low carbon fuels such as sustainable biomass, in line with broader Government priorities in delivering on clean air, and clean electricity. Beyond 2030, this switching will need to substantially increase in scale and be coupled with the deployment of new technologies, for example, carbon capture, usage and storage (CCUS). Over the course of this Parliament, we will therefore also develop a framework to support the decarbonisation of heavy industry.”

7.4.41 Page 69 deals with CCUS in detail. It states:

“There is a broad international consensus that carbon capture, usage and storage (CCUS) has a vital role in reducing emissions. This could be across a wide range of activities such as producing lower-emission power, decarbonising industry where fossil fuels are used and/or industrial processes as well as providing a decarbonised production method for hydrogen which can be used in heating and transport. This makes CCUS a potentially large economic opportunity for the UK. The International Energy Agency estimates there will be a global CCUS market with over £100 billion – even a modest share of this global market, UK GVA could increase between £5 billion and £9 billion per year by 2030.”

7.4.42 Subsequently one of the ‘Grand Challenges’ missions set by government (first published in September 2019 and most recently updated 26 January 2021) was confirmed as ‘to establish the world’s first Net-Zero carbon industrial cluster by 2040 and at least 1 low-carbon cluster by 2030’. The Grand Challenges were recently updated in January 2021, with the mission now to have at least 4 low-carbon clusters by 2030. In March 2020 £800 million funding was confirmed in the Budget to establish two or more new carbon capture and storage clusters by 2030. The Proposed Development is sited to be able to connect into the Zero Carbon Humber (ZCH) Partnership cluster. Furthermore, BEIS ran a consultation between February and March 2021 entitled “*Carbon capture, usage and storage: market engagement on cluster sequencing*” which sets out the proposed approach to prioritising two clusters for deployment in the mid-2020s.

7.4.43 Pages 93 - 101 of Chapter 4 cover ‘Delivering Clean, Smart, Flexible Power’. The overriding objective is to deliver a reduction in emissions from the power sector. Page 96 states that in order to achieve this it will be necessary to continue to bring down the costs of low carbon generation from renewables and nuclear and ensure that the UK can deploy CCUS at scale during the 2030s. Page 101 reiterates that Government’s commitment to supporting CCUS innovation and deployment through the BEIS Energy Innovation Programme.

7.4.44 The Proposed Development would clearly contribute to the delivery of the CGS in terms of the Government's objective to decarbonise both the industrial and energy sectors.

[Clean Growth – The UK Carbon Capture Usage and Storage deployment pathway – An Action Plan \(Department for Business, Energy & Industrial Strategy, 2018\)](#)

7.4.45 'Clean Growth – The UK Carbon Capture Usage and Storage deployment pathway - An Action Plan' (Department for Business, Energy & Industrial Strategy, 2018) ('the Action Plan') was published by the Government in 2018. The Executive Summary (pages 5 and 6) confirms that the Government's vision is for the UK to become a global leader in CCUS. The Action Plan is aimed at enabling the development of the first CCUS facility in the UK, with commissioning in the mid-2020s, which would support the ambition of being able to deploy CCUS at scale during the 2030s, subject to the costs coming down sufficiently. It goes on to state (page 6):

"Through our Clean Growth Strategy, we re-affirmed our commitment to the domestic deployment of CCUS subject to cost reductions. This Plan sets out our next steps to progress this commitment."

7.4.46 The Action Plan states that this can only be achieved through close Government and Industry partnership (page 14). The CCC, is quoted as emphasising the importance of CCUS to cost reductions *"as well as its crucial role in enabling deeper emissions reduction beyond that"*. Modelling by the Energy Systems Catapult ('ESC') for the Energy Technologies Institute ('ETI') supports the conclusion by the CCC that energy system decarbonisation could be up to 50% cheaper by 2050 if CCUS is deployed at scale and concludes that delaying deployment beyond the 2020s will increase the risks of decarbonising the UK's energy system. Both the CCC and ETI analysis conclude that initial deployment is required during the 2020s in order to have the option of deploying at scale during the 2030s, and in particular to keep open the option of UK CCUS deployment towards the scale that both state are required in 2050. This timeline was endorsed by the CCUS Cost Challenge Taskforce, and the conclusion was also reached by the Parliamentary Advisory Group on CCS. A key message from all these independent bodies is that deployment of CCUS during the 2020s is essential to unlock the greatest opportunities for cost reduction.

7.4.47 At page 32 (Industrial decarbonisation with CCUS) the Action Plan highlights the importance of CCUS in decarbonising energy intensive industries ('EII's'), including iron and steel, cement, chemicals, and oil refining. It goes on to state:

"Some of these industries produce volumes of emissions from chemical processes, in addition to combustion of fossil fuels, for example, up to 70% of emissions from cement production are from the process of producing cement,

rather than from energy use. These emissions cannot be abated by fuel switching or electrification.

Overall, CCUS could provide 37% of the total abatement potential in EITs by 2050. A recent study by McKinsey on decarbonising EITs showed that where carbon dioxide storage sites are accessible, CCUS is the lowest-cost decarbonisation option at current commodity prices. CCUS also enables the large-scale use of hydrogen as an industrial fuel, which the recent CCC and Element Energy reports have indicated could be one cost-effective pathway to industrial decarbonisation.”

7.4.48 The Action Plan (pages 35 to 37) also highlights the role of CCUS in decarbonising electricity generation, alongside an expansion of other forms of low and zero-carbon power generation to achieve ‘deep decarbonisation’ of the UK power sector.

7.4.49 The Proposed Development is consistent with the vision and ambition of the Action Plan.

[‘Net Zero’ by 2050 \(HM Government, 2019\)](#)

7.4.50 On 27 June 2019, the ‘Climate Change Act 2008 (2050 Target Amendment) Order 2019’ came into force. The Order enshrines within UK law, the commitment to achieve ‘Net Zero’ in terms of GHG emissions by 2050. The Order amended the previous target (within the Climate Change Act 2008) which was seeking achievement of a reduction in GHG emissions of 80% by 2050 compared to 1990 levels.

7.4.51 The commitment to achieve ‘Net Zero’ by 2050 was based on the recommendations of the CCC set out in its report ‘Net Zero – The UK’s Contribution to Stopping Global Warming’ (CCC, 2019) (the ‘CCC Report’). The CCC Report is clear that if Net Zero is to be achieved, the remaining GHG emissions will need to be offset by removing carbon dioxide and permanently sequestering it through technologies such as CCUS. The CCC Report identifies CCUS as having a key role to play in mitigating GHG emissions.

7.4.52 . The important role of CCUS is also stressed in terms of capturing the carbon dioxide from non-renewable electricity production, industry and the production of hydrogen (given the ambition to move to a hydrogen economy that is seen as critical to achieving Net Zero) (page 23). The scenarios considered involve the aggregate annual capture and storage of 75 - 175Mt CO₂ in 2050, which would require major carbon dioxide transport and storage infrastructure servicing at least five clusters. The CCC Report concludes that CCUS is a necessity for the UK, not an option.

[Reducing UK emissions: 2020 Progress Report to Parliament \(Committee for Climate Change, 2020\)](#)

7.4.53. The CCC issued its latest progress report ‘Reducing UK emissions: 2020 Progress Report to Parliament’, in June 2020 (the ‘Progress Report’). The Progress Report (required under Climate Change Act 2008) provides an annual review of UK progress in reducing GHG emissions. This followed a May 2020 update published on the CCC’s website, which raised concerns over the UK’s ability to meet its fourth (2023 - 27) and fifth (2028 - 32) carbon budgets (despite these being set against the previous target of an 80% reduction in emissions by 2050) and stressed the need, in view of the more challenging Net Zero target, for progress on emissions reductions to be accelerated.

7.4.54 Much of the Progress Report focuses on providing advice to government on delivering a recovery from Covid-19 that both accelerates the transition to Net Zero and strengthens the UK’s resilience to the impacts of climate change, whilst driving new economic activity. The Executive Summary (page 13) raises concern that over the preceding 12 months, the UK Government has not made the policy progress that the CCC called for in 2019 and it highlights the importance of the EWP including measures to expand supplies of low-carbon power, encourage a resilient and flexible energy system and provide enduring market mechanisms to drive investment in low-carbon industrial technologies and industrial sectors.

7.4.55 At page 18, the Executive Summary calls for the NIS to set a vision for infrastructure development over the next 30 years consistent with Net Zero and that important priorities should include “carbon storage infrastructure”. It goes on to state that the Government has consulted on mechanisms to incentivise CCS and announced a £250m ‘Clean Steel Fund’:

“However, coverage of these policies is far too narrow and progress has been too slow, as has delivery of the existing £600m capital funds for decarbonising manufacturing. There is still no strategic approach to drive change at the required scale and pace.” (page 19)

“A funding mechanism is needed for the operational costs of demonstration and early deployment of industrial electrification and hydrogen use as well as carbon capture and storage (CCS). Faster deployment of announced funds would support jobs, skills and the recovery, while enabling crucial progress on decarbonisation.” (page 21)

7.4.56 The Executive Summary sets out the CCC’s recommendations by government department. Table 4 of the Executive Summary sets out recommendations for the BEIS. At page 28 these cover CCS and include:

- choosing a preferred funding model and mechanism for delivering carbon dioxide infrastructure – by 2020;

- planning for carbon capture plant to be operational at multiple clusters – by the mid-2020s; and
- supporting business models for CCS designed for use in industry, electricity production and GHG removals – by 2020/ ongoing.

7.4.57 Chapter 1 of the Progress Report ‘A review of the climate challenge after COVID-19’ sets out ‘Medium-term milestones’ at Table 1.1 (pages 57 and 58) to be on track for Net Zero emissions, which include the following where there is a role for CCS:

“Industry – CO₂ transport and storage infrastructure operational, and hydrogen available, at multiple industrial clusters by the mid-2020s.”

“Greenhouse gas removals – Initial deployment of engineered greenhouse gas removals (e.g. bioenergy with CCS (BECCS) in power generation, hydrogen production, industry and/or aviation fuel production), driven by incentives and enabled by CO₂ infrastructure development.”

7.4.58 Chapter 2 ‘Progress since 2008’ (page 68) highlights that while in the power sector there has been an increase in generation from low-carbon sources over the decade deployment of CCS technologies as a means of decarbonising industry has remained limited. CCS (page 80) is seen as a key pillar in achieving Net Zero, and the Progress Report stresses that significant progress is required in the 2020s to get on track to meeting the target by 2050. It goes on to state that CCS is yet to be developed at scale in the UK and that it must be a priority progress area for the 2020s.

7.4.59 Chapter 4 ‘Progress on emissions, indicators and policy in the last year’ at Table 4.2 (pages 114 - 115) again highlights concerns over the lack of progress by the UK Government in terms of setting out a preferred mechanism for carbon dioxide transport and storage infrastructure and a plan to enable multiple CCS facilities to be operational by the mid-2020s. The Progress Report (page 117), however, welcomes the commitment by the Government to the £800m CCS Infrastructure Fund to establish CCS in at least two industrial clusters, as well as the £250m Clean Steel Fund adding to support of around £600m for industrial decarbonisation.

7.4.60 Chapter 5 ‘Planning a resilient recovery’ (page 141) refers to how the CCC reconvened its Expert Advisory Group on the Costs and Benefits of Net Zero in May 2020 to consider the macro-economics of the Covid-19 pandemic and the role of climate change measures in supporting a recovery. The Group was clear that climate change policy should play a central role in efforts to rebuild from Covid-19 and set out a range of short and long-term measures to achieve this. This includes a recommendation (page 142) that investments in low-carbon and climate adaptation infrastructure are at the heart of measures to restore economic growth following Covid-19 (page 142 - Box 5.4). At pages 152, key priorities for infrastructure investments are identified as including:

“... new ... carbon capture and storage (CCS) infrastructure which will be needed to support the next phase of the net-zero transition.”

7.4.61 Chapter 6 ‘What is needed now - UK climate policy’ sets out the CCC’s view on priorities for the UK Government in terms of achieving Net Zero. These include (page 167) showing clear leadership on CCUS with concrete and funded plans for deploying CCUS in the mid-2020s. Page 181 goes on to state that UK industry can be decarbonised to near-zero emissions without offshoring and that government must implement an approach to incentivise industries to reduce emissions through energy and resource efficiency, fuel switching and CCS, amongst other measures.

7.4.62 The Progress Report set out a number of priorities for the EWP (page 184), including that:

“Carbon Capture and Storage is a necessity, not an option, for the UK’s net-zero objectives. Plans should be delivered for CCS to be operational at multiple industrial clusters from the mid-2020s, with ambition for scaling up infrastructure beyond this”.

7.4.63 It is therefore clear that CCS/ CCUS is at the heart of the CCC’s priorities and recommendations for UK Government.

[The Ten Point Plan for a Green Industrial Revolution \(HM Government, 2020b\)](#)

7.4.64 ‘The Ten Point Plan for a Green Industrial Revolution – Building back better, supporting green jobs, and accelerating our path to net zero’, was published on 18 November 2020 and is aimed at delivering a ‘Green Industrial Revolution’ in the UK, with the foreword by the Prime Minister stating that the Ten Point Plan will aim to mobilise £12 billion of government investment and potentially three times as much from the private sector, to create and support up to 250,000 green jobs. As mentioned above, the Ten Point Plan is followed on from and built on by the EWP.

7.4.65 The Introduction to the Ten Point Plan (pages 5 - 6) states that:

“We will generate new clean power with offshore wind farms, nuclear plants and by investing up to half a billion pounds in new hydrogen technologies. We will use this energy to carry on living our lives, running our cars, buses, trucks and trains, ships and planes, and heating our homes while keeping bills low. And to the extent that we still emit carbon, we will pioneer a new British industry dedicated to its capture and return to under the North Sea...”

7.4.66 The ‘Ten Points’ of the Plan are summarised at page 7 of the document. Of particular relevance to the Proposed Development is Point 8 – “Investing in Carbon Capture, Usage and Storage (CCUS),” dealt with at pages 22 - 23 of the Ten Point Plan. The Ten Point Plan states that CCUS will be an exciting new

industry to capture the carbon we continue to emit and revitalise the birthplaces of the first Industrial Revolution. It states that the Government's ambition is to capture 10Mt of CO₂ a year by 2030, the equivalent of four million cars' worth of annual emissions. It goes on to set out the Government's commitment to invest up to £1 billion to support the establishment of CCUS in four industrial clusters, creating 'transformative SuperPlaces' in areas such as the North East, the Humber, North West, Scotland and Wales. It notes that the Government will bring forward details in 2021 of a revenue mechanism to bring through private sector investment into industrial carbon capture and hydrogen projects via new business models to support these projects.

7.4.67 The Ten Point Plan (page 24) highlights the function and necessity of CCUS in achieving a green economy and the Government's commitment to establish CCUS in two industrial clusters by the mid-2020s:

"CCUS technology captures carbon dioxide from power generation, low carbon hydrogen production and industrial processes, storing it deep underground where it cannot enter the atmosphere. This technology will be globally necessary, but no one country has yet captured the market. The UK has an unrivalled asset – our North Sea, that can be used to store captured carbon under the seabed. Developing CCUS infrastructure will contribute to the economic transformation of the UK's industrial regions, enhancing the long-term competitiveness of UK industry in a global net zero economy. It will help decarbonise our most challenging sectors, provide low carbon power and a pathway to negative emissions. We will establish CCUS in two industrial clusters by mid 2020s, and aim for four of these sites by 2030, capturing up to 10 Mt of carbon dioxide per year. Developed alongside hydrogen, we can create these transformative "SuperPlaces" in areas such as the heart of the North East, the Humber, North West and in Scotland and Wales. Our £1 billion CCUS Infrastructure Fund will provide industry with the certainty required to deploy CCUS at pace and at scale. These clusters will be the starting point for a new carbon capture industry, which could support up to 50,000 jobs in the UK by 2030, including a sizeable export potential. Alongside this, we will bring forward details in 2021 of a revenue mechanism to bring through private sector investment in industrial carbon capture and hydrogen projects, to provide the certainty investors require."

7.4.68 The Proposed Development would establish CCUS and would therefore support delivery of Point 8 of the Ten Point Plan and the creation of the type of "hub" or "SuperPlace" envisaged by the Plan where renewable energy, CCUS and hydrogen technologies could congregate and generate significant numbers of jobs.

[National Infrastructure Strategy: Fairer, faster, greener \(HM Treasury, 2020\)](#)

7.4.69 The NIS was published on 25 November 2020, a week after the Prime Minister's Ten Point Plan. The NIS sets out the Government's plans to deliver

an infrastructure revolution in the UK, while “levelling the country up” and achieving its Net Zero target by 2050. It also provides the Government’s formal response to the NIC’s recommendations on infrastructure provision in their National Infrastructure Assessment (NIC, 2018).

7.4.70 Chapter 2 ‘Levelling up the whole of the UK’ (page 27) highlights how the Government wants to use infrastructure to unite and level up the UK by prioritising those areas that have received the least support in the past and to create ‘regional powerhouses’. One of the measures identified to achieve this, is backing new green growth clusters in traditional industrial areas, with investment in CCS, offshore wind, port infrastructure and low-carbon hydrogen production.

7.4.71 A key theme of the NIS is ‘Decarbonising the economy and adapting to climate change’ and this is dealt with at Chapter 3. The Government identifies that (page 48) new technologies and skills will need to be developed to continue decarbonising and recognises that it will have a role to play in driving both the development and deployment of such technologies, including:

“Investment in these areas, where the UK has competitive advantage, can create the knowledge and skills needed for a green industrial revolution, driving leadership in the industries of the future, reducing national and global emissions, as well as providing the platform for significant economic growth. Where these investments are brought together to create place-based industrial clusters they can transform local economies, creating productive jobs, developing specialist skillsets, and attracting private investment. For example, the North East of England could become a home of choice for companies delivering carbon capture and storage; making hydrogen power a part of daily life; and designing, building and maintaining offshore wind turbines.”

7.4.72 The future role of CCS in contributing to the Net Zero target is further underlined in Chapter 3 of the NIS (pages 50 - 53). In terms of power, it is recognised that even by 2050, given the intermittent nature of renewables, there will still be requirement for more reliable sources of power, from nuclear or power stations that burn hydrogen or gas with CCS. Power stations with CCS could provide valuable low carbon electricity when renewables are not generating by capturing the emissions from biomass or gas-fired generation. CCS is also seen as essential to decarbonising large parts of industry, producing low carbon hydrogen and in delivering GHG removal technologies permanently locking away carbon dioxide.

7.4.73 Importantly (page 53), the NIS recognises the CCS/ CCUS technology has not yet been delivered at scale and that there is a key role for government to play in bringing this forward. Consistent with the Ten Point Plan, it therefore sets out the Government’s increased ambition to support CCS with £1 billion of funding (up from £800m) to bring forward four CCS clusters by the end of the decade, with construction to begin on two by the mid-2020s with the aim of capturing 10Mt of carbon dioxide a year by 2030.

7.4.74 The Proposed Development comprises investment in CCS and contributes to the creation of a regional powerhouse. It will contribute to decarbonising the economy and contributing to the UK Government's Net Zero target.

7.5 National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG)

7.5.1 The latest version of the NPPF was most recently updated in June 2019 (MHCLG, 2019a). The policies contained within the NPPF are expanded upon and supported by the 'Planning Practice Guidance' (MHCLG, 2019b).

7.5.2 The NPPF sets out the Government's planning policies for England and how these are to be applied and is a material consideration in planning decisions. Paragraph 5 of the NPPF states that the document does not contain specific policies for NSIP and that applications in relation to NSIP are to be determined in accordance with the decision-making framework set out in the 2008 Act and relevant NPS, as well as any other matters that are considered both important and relevant. However, matters that can be considered to be both important and relevant to NSIP may include the NPPF and the policies within it.

7.5.3 Paragraph 7 of the NPPF is clear that the purpose of the planning system is to contribute to the achievement of sustainable development and that the policies that are set out in the Framework, taken as a whole, constitute the Government's view of what sustainable development in England means in practice. Paragraph 8 goes on to identify three overarching objectives to achieving sustainable development:

- an economic objective - to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;
- a social objective - to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and
- an environmental objective - to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

7.5.4 Paragraph 148 in Section 14 states that:

“The planning system should support the transition to a low carbon future in a changing climate ... it should help to: “shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.”

- 7.5.5 Paragraph 154 states that when determining application for renewable and low carbon development, there should be no requirement for applicants to demonstrate the overall need for renewable or low carbon energy in application submission and that applications for renewable or low carbon development should be approved if their impacts are (or can be made) acceptable.
- 7.5.6 Sections of the NPPF that are of particular relevance relevant to the scope of the EIA presented in **Chapters 8-18** of this ES (ES Volume I – **Application Document Ref. 6.2**) include:
- 2 – Achieving sustainable development;
 - 6 – Building a strong, competitive economy;
 - 11 – Making effective use of land;
 - 12 – Achieving well designed places;
 - 14 – Meeting the challenge of climate change, flooding and coastal change;
 - 15 – Conserving and enhancing the natural environment; and
 - 16 – Conserving and enhancing the historic environment.
- 7.5.7 On 30 January 2021, the Ministry of Housing, Communities & Local Government begun a consultation on draft revisions to the NPPF (MHCLG, 2020) and a new draft National Model Design Code (MHCLG, 2021). The summary of proposed amendments to the draft NPPF states that the revised Framework:
- implements policy changes in response to the Building Better Building Beautiful Commission recommendations;
 - makes a number of changes to strengthen environmental policies – including those arising from review of climate change and flood risk with Defra;
 - includes minor changes to clarify policy in order to address legal issues;
 - includes changes to remove or amend out of date material;
 - includes an update to reflect a recent change made in a Written Ministerial Statement about retaining and explaining statues; and
 - Clarification on the use of Article 4 directions in relation to certain permitted development rights.

- 7.5.8 The purpose of the National Model Design Code is to provide detailed guidance on the production of design codes, guides and policies to promote successful design. It expands on the ten characteristics of good design set out in the National Design Guide: Planning practice guidance for beautiful, enduring and successful places (MHCLG, 2021), which reflects the government's priorities and provides a common overarching framework for design. The National Model Design Code is intended to form part of the government's planning practice guidance. It is not a statement of national policy. However, once finalised, the government recommends that the advice on how to prepare design codes and guides is followed.
- 7.5.9 In light of the above, neither the draft amendments to the NPPF nor the National Design Code are considered to be of specific relevance to the Proposed Development.

7.6 Local Planning Policy

- 7.6.1 The Proposed Development Site lies entirely within the administrative area of NLC. The statutory development plan for the area currently comprises the following documents:
- North Lincolnshire Local Development Framework Core Strategy (the Core Strategy) (NLC, 2011) - adopted June 2011;
 - North Lincolnshire Local Development Framework Housing and Employment Land Allocations DPD (the Allocations DPD) (NLC, 2016) - adopted March 2016; and
 - Saved Policies of the North Lincolnshire Local Plan (the Local Plan) (Local Development Frameworks Government Office for Yorkshire and The Humber, 2007) - adopted May 2003, saved September 2007.
- 7.6.2 It is considered that these documents may be 'important and relevant' as defined in the 2008 Act and EN-1. The following policies are considered relevant to the Proposed Development:

Core Strategy (2011)

- 7.6.3 The following Spatial Objectives are considered relevant from the Core Strategy:
- Spatial Objective 1: An Area Wide Renaissance;
 - Spatial Objective 4: Creating Greater Economic Success;
 - Spatial Objective 6: Protecting and Enhancing the World Class Environment;
 - Spatial Objective 7: Efficient Use and Management of Resources; and
 - Spatial Objective 10: Creating A Quality Environment.

7.6.4 The following policies are considered relevant from the Core Strategy:

- CS1 – Spatial Strategy for North Lincolnshire;
- CS2 – Delivering More Sustainable Development;
- CS3 – Development Limits;
- CS5 – Delivering Quality Design in North Lincolnshire;
- CS11 – Provision and Distribution of Employment Land;
- CS16 – North Lincolnshire’s Landscape, Greenspace and Waterscape;
- CS17 – Biodiversity;
- CS18 – Sustainable Resource Use and Climate Change;
- CS19 – Flood Risk;
- CS20 – Sustainable Waste Management; and
- CS25 – Promoting Sustainable Transport;

[Policies from the Allocations DPD \(2016\)](#)

7.6.5 Although the Allocations DPD forms part of the Development Plan for the area, none of its policies are considered to be of relevance to the Proposed Development.

[Saved Policies of the Local Plan \(2003\)](#)

7.6.6 The following saved policies are considered relevant:

- DS1 – General Requirements;
- IN10 – Wharves;
- RD1 – Development involving High Quality Agricultural Land;
- RD2 – Development in the Open Countryside;
- T1 – Location of Development;
- T2 – Access to Development;
- T5 – Green Travel Plans;
- T6 – Pedestrian Routes and Footpaths;
- T8 – Cyclists and Development;
- T14 – The North Lincolnshire Strategic Road Network (NLSRN);
- T19 – Car Parking Provision and Standards;
- T23 – Water Freight;

- LC1 – Special Protection Areas, Special Areas of Conservation and Ramsar Sites;
- LC2 – Sites of Special Scientific Interest and National Nature Reserves;
- LC4 – Development Affecting Sites Of Local Nature Conservation Importance
- LC5 – Species Protection
- LC6 – Habitat Creation
- LC7 – Landscape Protection;
- LC12 – Protection of Trees, Woodland and Hedgerows;
- HE5 – Development affecting Listed Buildings;
- HE9 – Archaeological Evaluation;
- DS1 – General Requirements;
- DS7 – Contaminated Land;
- DS10 – New Hazardous Installations and Pipelines;
- DS11 – Polluting Activities;
- DS12 – Light Pollution;
- DS13 – Groundwater Protection and Land Drainage;
- DS14 – Foul Sewage and Surface Water Drainage;
- DS15 – Water Resources;
- DS16 – Flood Risk; and
- DS17 – Overhead Power Lines and High-Powered Electrical Installations.

7.6.7 **Work No. 4A** (Canal Water Abstraction Option), as shown in the Works Plan (**Application Document Ref 4.3**) is deliberately located to connect with the Stainforth and Keadby Canal. The lock at the junction of the canal and the River Trent is grade II listed and designated by NLC as a heritage asset in their adopted Local Plan. The lock is located adjacent to the Waterborne Transport Offloading Area, specifically **Work No. 10B**. The Stainforth and Keadby Canal is also designated as a Local Wildlife Site (LWS).

7.6.8 The River Trent, immediately to the east of and connecting with **Work No. 4B** and **Work No. 5** is part of the designated RAMSAR, Site of Special Scientific Interest (SSSI) and Special Area of Conservation (SAC) for the Humber Estuary.

7.6.9 The Proposed Development Site is predominantly within the open countryside, albeit the proposed 'River Water Abstraction Option (**Work No. 4B**) is adjacent

to Keadby Development Boundary. The 'Water Discharge Corridor' (**Work No. 5**) partially runs through the Keadby Development Boundary.

Emerging Policy

7.6.10 NLC is preparing a new Local Plan to 2036. Once agreed (formally adopted), it will replace the current North Lincolnshire Local Plan, the Core Strategy and the Housing and Employment Land Allocations Development Plan Documents (DPD).

7.6.11 Most recently, NLC undertook their Regulation 18 'Preferred Options' consultation between February and March 2020. NLC is currently working on 'The Draft Plan', the final version of the Local Plan, prior to its submission to the Planning Inspectorate.

Summary

7.6.12 The designated energy NPS and the MPS (Department for Environment, Food & Rural Affairs, 2011) represent the principal policy documents against which applications for NSIP are determined. They set out a number of generic impacts and considerations relevant to the scoping of projects, and assessment principles with which applications for NSIP are expected to comply.

7.6.13 The EWP (UK Government, 2020) has confirmed that the SoS has decided that it is appropriate to review the current suite of energy NPS, to ensure that they reflect the policies set out in the EWP and that the UK Government continues to have a planning policy framework which can deliver the investment required to build the infrastructure needed for the transition to Net Zero. While the review is undertaken, the current suite of NPS remains relevant government policy and has effect for the purposes of the 2008 Act.

7.6.14 EN-1 (DECC, 2011a) also sets out the government's need case for new energy NSIP. As outlined above, a range of evidence from the following documents demonstrates the continued relevance and urgency of the need case set out in EN-1:

- National Infrastructure Plan (HM Treasury, 2014) (the 'NIP 14');
- Clean Growth Strategy – Leading the way to a low carbon future (Department for Business, Energy & Industrial Strategy, 2017) ('the CGS');
- Clean Growth - The UK Carbon Capture Usage and Storage deployment pathway - An Action Plan (Department for Business, Energy & Industrial Strategy, 2017);
- 'Net Zero – Opportunities for the Power Sector' (National Infrastructure Commission); and
- Climate Change Act 2008 (2050 Target Amendment) Order.

- 7.6.15 The Proposed Development would support the delivery of NPS policy, the NIP 14, and the CGS and support the statutory target of 'Net Zero' GHG emissions by 2050. Each technical chapter of the ES (**Chapters 8-19** (ES Volume I – **Application Document Ref. 6.2**)) explains the policies in the NPS that have informed, and are informing, the design, assessment, and controls applicable to the Proposed Development.
- 7.6.16 EN-2 (DECC, 2011b) does not prescribe locations for this type of energy NSIP but establishes criteria by which developers should identify suitable sites. **Chapter 3: The Site and Surrounding Area** (ES Volume I – **Application Document Ref. 6.2**) explains the suitability of the chosen site for the Proposed Development.
- 7.6.17 The EWP (UK Government, 2020) seeks to put in place a strategy for the wider energy system that transforms energy, supports a green recovery and creates a fair deal for consumers. At the core of the EWP is the commitment to achieving Net Zero and tackling climate change and it includes extensive support for CCUS. Part of the EWP details different potential electricity mixes to 2050 and it is notable that gas with CCS is an important component of those mixes.
- 7.6.18 For these reasons, the Applicant considers that there is a clear and compelling national need for the Proposed Development. The Proposed Development would also support the objectives of the National Infrastructure Plans & Assessments, Clean Growth Strategy and would exceed the requirements of NPS policy on CCR, through the inclusion of a CCP and by the Applicant working with industry partners to remove uncertainty around commercial scale CCUS. The Applicant therefore proposes to submit an application for a DCO for the Proposed Development and has selected the Proposed Development Site for relevant environmental, technical and commercial reasons.
- 7.6.19 A range of national and local policy and guidance has also been identified to be important and relevant to the determination of the application and has been considered as part of scoping and execution of the EIA.

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