The ExxonMobil ‘Solent CO2’ Project – Non-statutory Consultation

“Our Project aims to install an underground pipeline through which captured carbon dioxide (CO2) from our Fawley Manufacturing Complex, and potentially the wider Solent area, can be transported to a deep rock formation in the English Channel where it can be safely stored. We are calling it the Solent CO2 Pipeline Project.”

Michael Foley - UK Low Carbon Solutions Executive

ExxonMobil

1. Public reaction to this proposal reflects the flawed and incomplete documentation provided with the consultation pack

2. No clear explanation is given for the seemingly perverse exclusion of the possible end-to-end undersea ‘Corridors’

3. The proposed ‘Development Consent Order’ approach to planning restricts local authority engagement and devalues environmental protections

4. The Solent CO_2 proposal lacks credibility without detailed understanding of its Solent Cluster context

5. The scale of environmental disruption proposed by ExxonMobil warrants far deeper assessment of the viability of the wider benefits case

ExxonMobil propose to apply directly to the DESNZ Secretary of State for a Development Consent Order under the terms of a ‘Nationally Significant Infrastructure Project’ (NSIP)

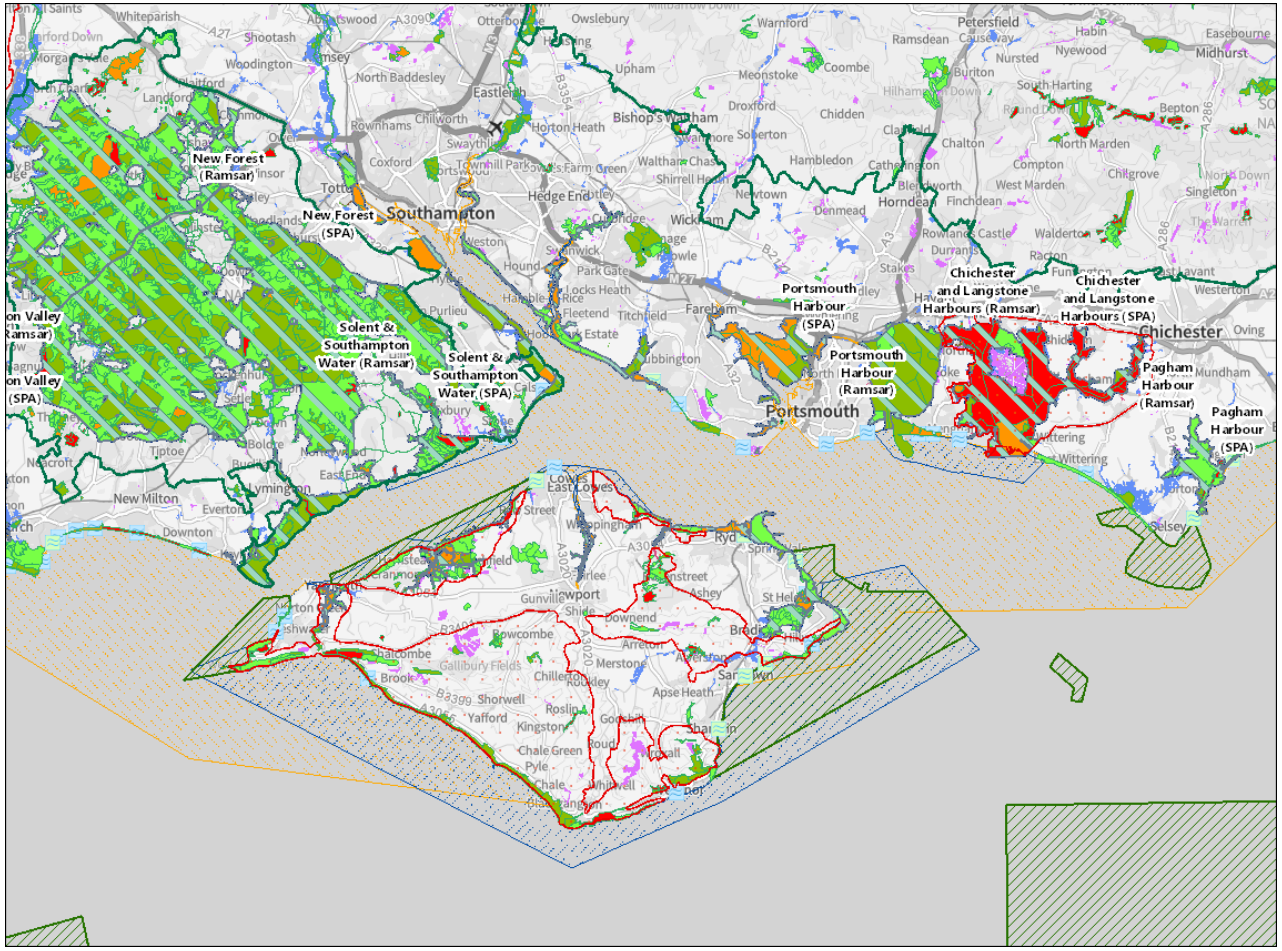
1. Planning decision is with UK Government Department of Energy Security & Net Zero (DESNZ) Secretary of State, advised by the Planning Inspectorate

2. NSIP process bypasses Local Planning Authority, which now has little influence over decision

3. Environmental designations are accorded lower priority than ‘national need’ in the NSIP decision process.

4. The Secretary of State decision on NSIP Development Control Orders is usually final

The Solent Region contains a wide variety of important habitats and environments, many of international significance, many already under threat



Source – MAGIC, managed by Natural England on behalf of UK Government departments

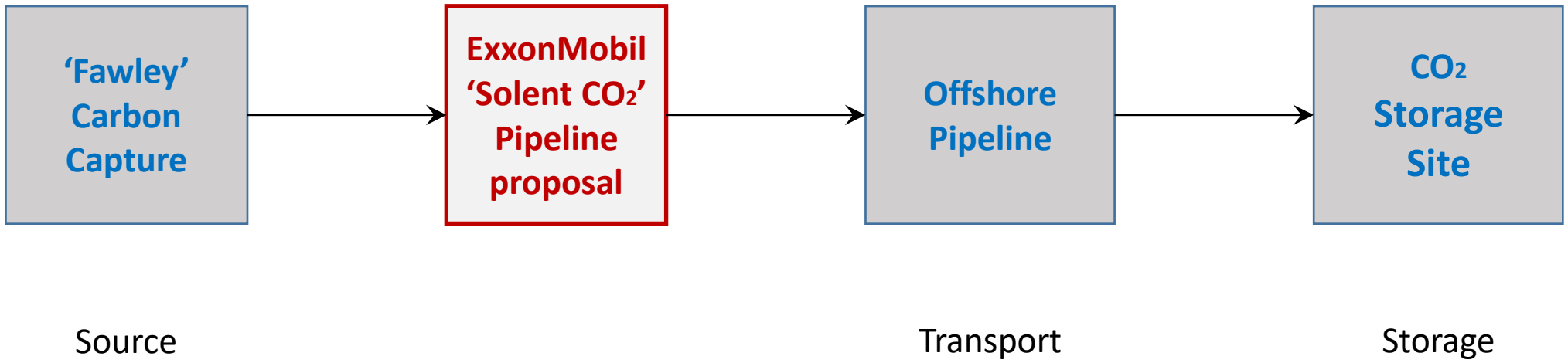
1. Multiple environmental designations and protections apply to all land based routes and associated water bodies and sea beds within the Solent region

2. The Isle of Wight and its coastal waters are designated as a Biosphere Reserve by the United Nations Educational, Scientific and Cultural Organisation (UNESCO)

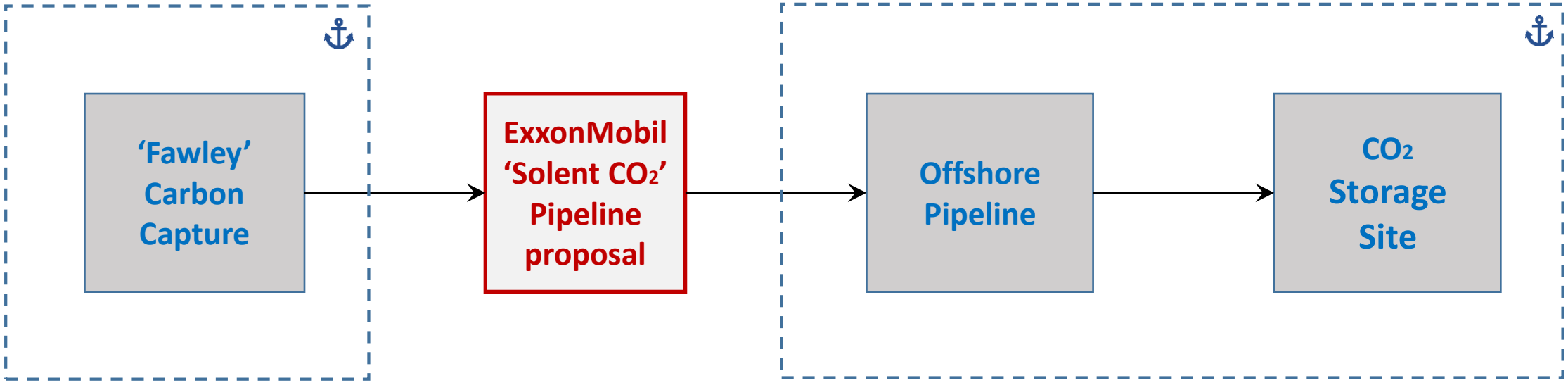
3. The Biosphere Reserve covers the whole of the Island's surface (380km square) and all inshore waters (535km square)

4. The shortlisted corridor choice is premature. Further detail on environmental mitigation is essential before any final route shortlist can be justified

The ‘Solent CO2’ pipeline proposition cannot be assessed in isolation from the detailed context of the proposed ‘upstream’ source projects and ‘downstream’ transport and storage projects



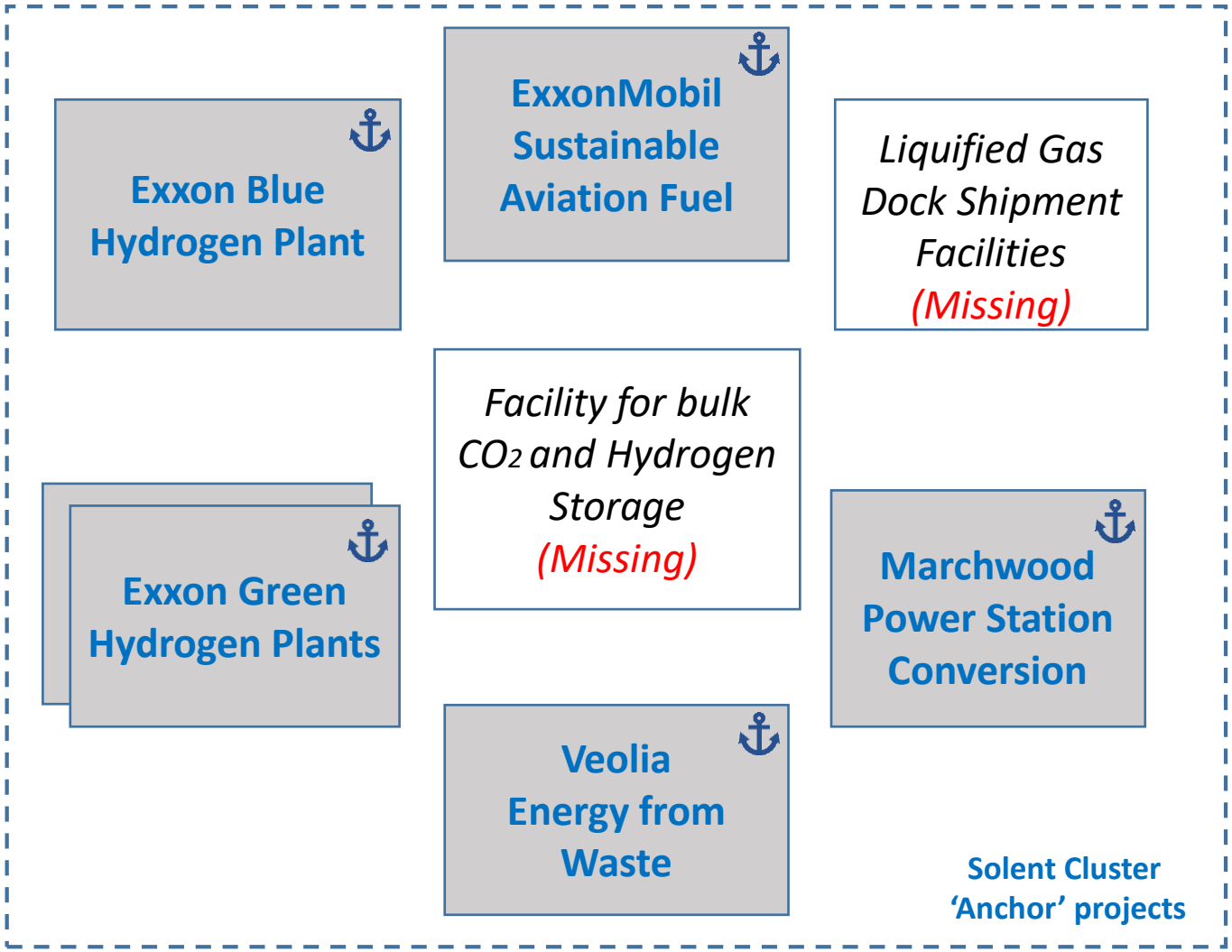
ExxonMobil's 'Solent CO2' pipeline proposal is a key enabler for the Solent Cluster proposition to the UK Government Carbon Capture, Usage and Storage strategy

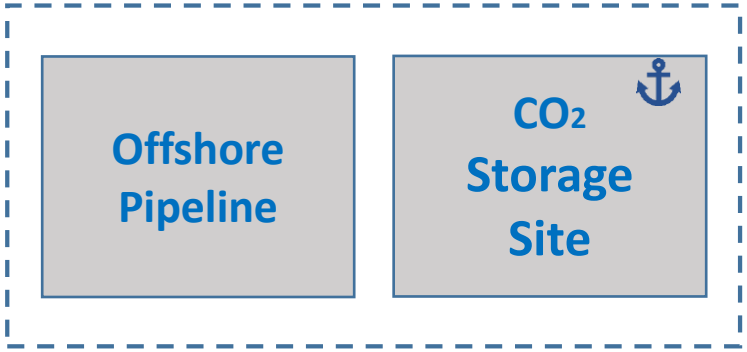


Solent Cluster 'Anchor' Projects

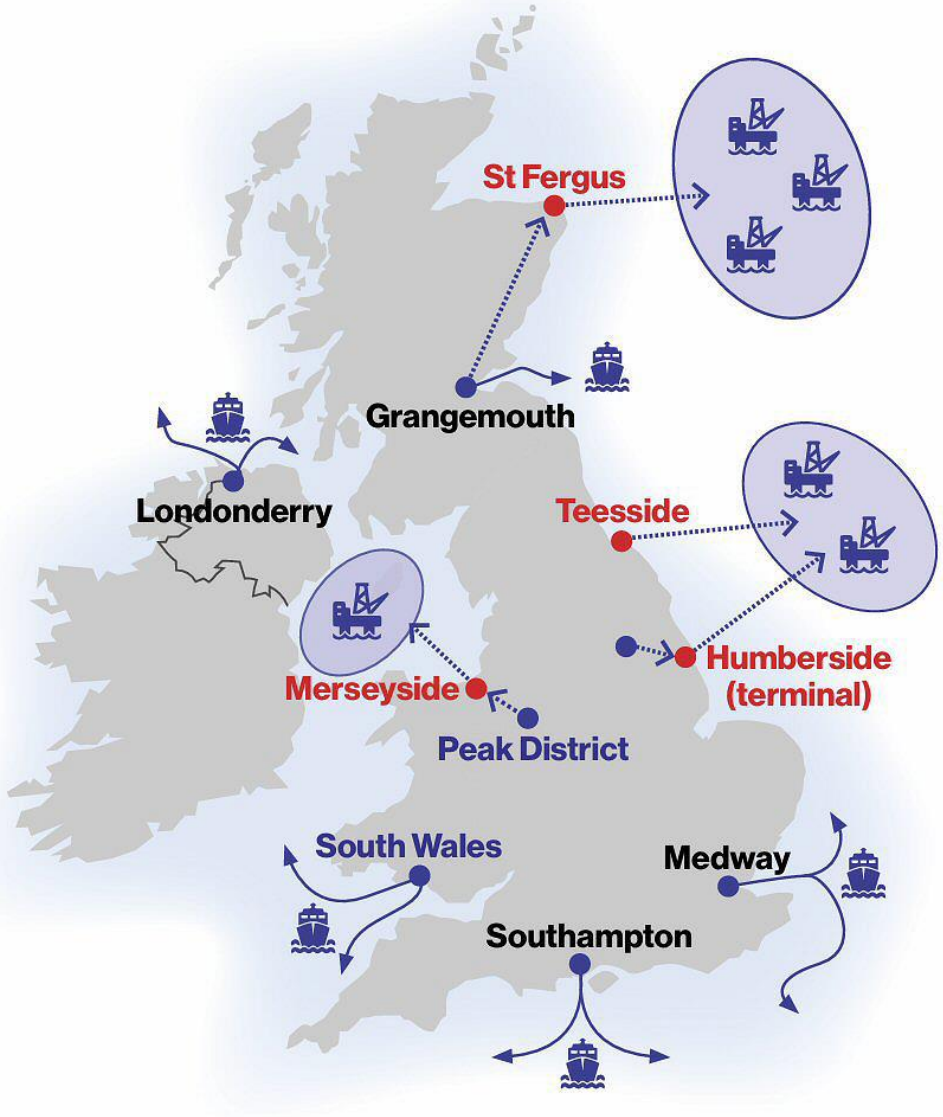
ExxonMobil DCO Application

Solent Cluster ‘upstream’ and ‘downstream’ programme of ‘anchor’ projects appears immature, conditional upon a coherent business case, a demonstrable funding model and DESNZ support





ExxonMobil DCO Application



HM Government – UK Industrial Decarbonisation Strategy

1. The UK Government Industrial Decarbonisation Strategy clearly shows the intent to exploit depleted oilfields in the North Sea for storage of CO2 captured from the industrial heartland of the north of England and Scotland

2. In the south of England and Wales, the original strategy shows captured CO2 being shipped by tankers from already established ports to the strategic undersea storage sites or to overseas facilities

3. If a pipeline is proven to be the only realistic transport mechanism, then far more geological detail on storage viability and environmental mitigation is essential before any final route shortlist can be justified

4. The assumption by ExxonMobil that undersea storage is ‘the answer’ and its shortlisting of the three land-based pipeline corridors is premature

There are many ‘Clusters’ of industrial companies and businesses competing for public government funding and private financial backing across the UK industrial heartland

1. East Coast Cluster and Hynet North West **selected** for DESNZ CCUS ‘Track 1’ – Oct 2021

2. Viking (East Coast Cluster) and Acorn (Scottish Cluster) **selected** for DESNZ CCUS ‘Track 2’ – Dec 2023

3. ‘South Wales Industrial Cluster’, ‘Peak Cluster’ & ‘Bacton Thames Net Zero’ are well placed for future DESNZ ‘Track 2’ selection

4. ‘Solent Cluster’ is some way behind in a set of smaller clusters with relatively small CCUS benefit compared to high environmental cost.

Carbon Capture & Storage Association – May 2023

Background charts

Iron and Steel
Annual emissions: 11.2m tonnes

Ceramics
Annual emissions: 3.1m tonnes*

Chemicals
Annual emissions: 11.7m tonnes

Glass
Annual emissions: 3.1m tonnes*

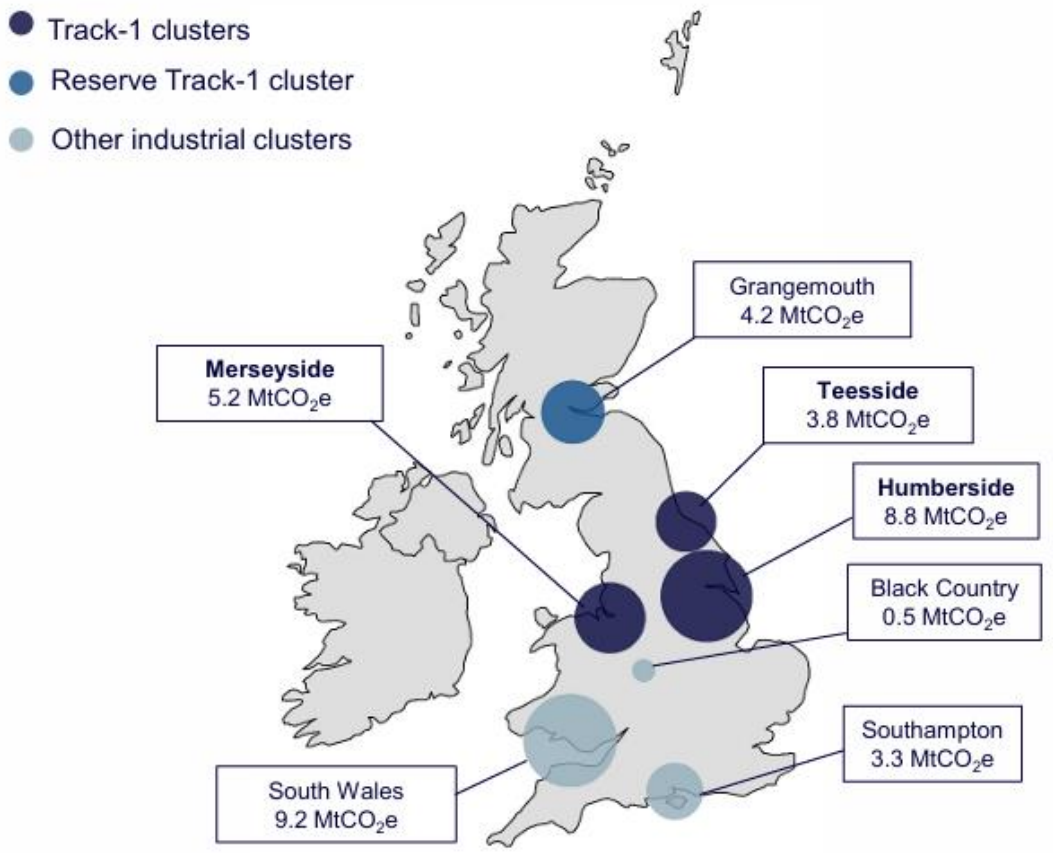
Food and Drink
Annual emissions: 8.1m tonnes

Cement
Annual emissions: 10.8m tonnes

Pulp and Paper
Annual emissions: 2.2m tonnes

Refining
Annual emissions: 13.8m tonnes

Department for Business, Energy and Industrial Strategy – July 2022



Map of major UK industrial cluster emissions from large point sources
There are other areas of industrial activity across the UK with an interest in developing CCUS.
Source: NAEI 2019 data. Annual emissions. Does not capture non-ETS emissions in a cluster.

UK Govt CCUS Net Zero Investment Roadmap – April 2023

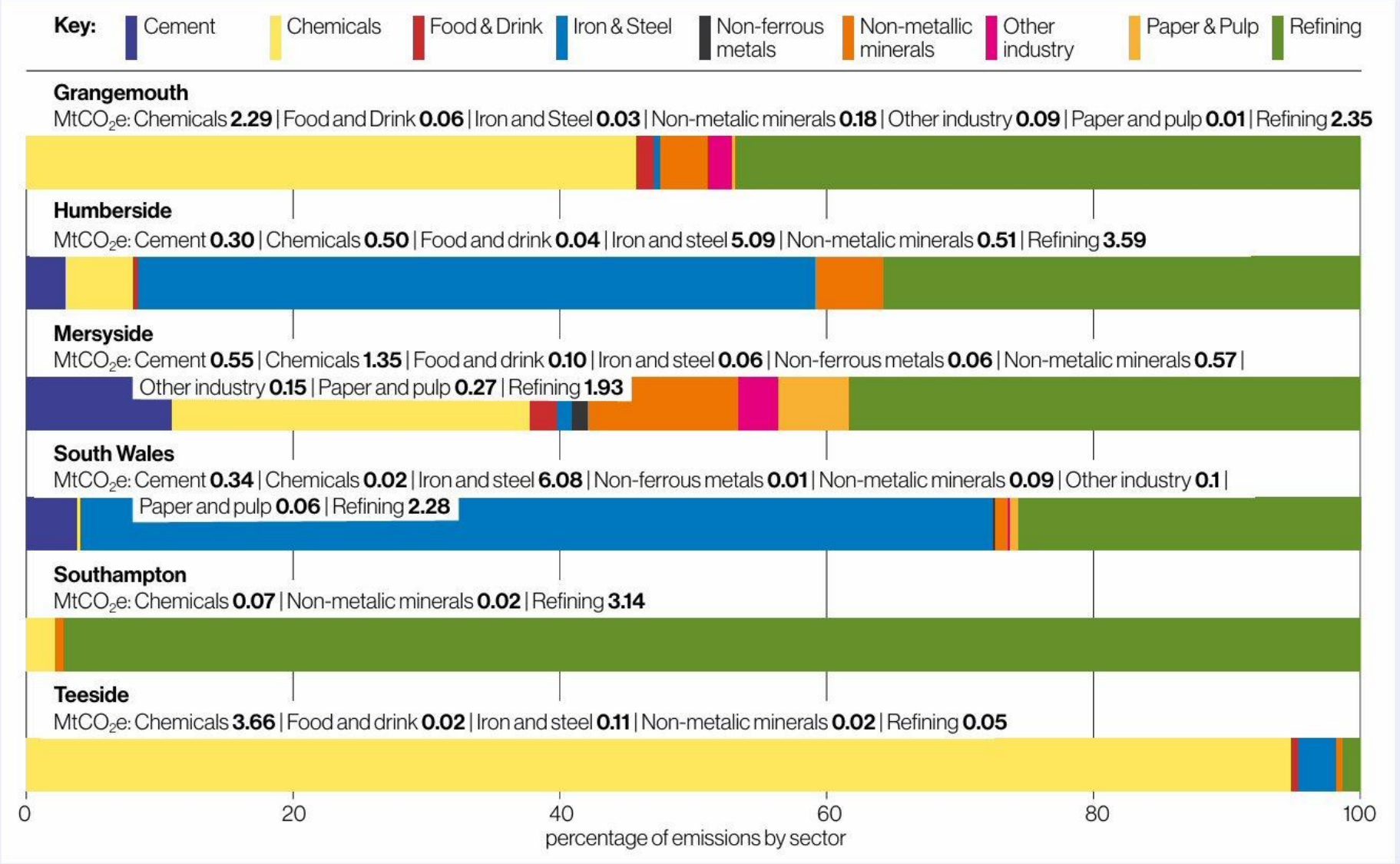


Figure 2: – Cluster emissions breakdown by sector
Source: NAEI 2018 data. Does not capture non-ETS emissions in a cluster

Based on EU ETS (Emissions Trading System) data source

Bids for licences to evaluate the English Channel CO_2 storage site were only submitted in July 2024. The ‘CO2 Pipeline’ consultation remains silent on the anticipated viability of the site