



Aldbrough Hydrogen Storage

Adequacy of Consultation Milestone Report

12 December 2025
Project No: 0630444

ALDBROUGH
HYDROGEN STORAGE

A collaboration between SSE Thermal and Equinor

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ACRONYMS AND ABBREVIATIONS

Acronym	Description
AoCM	Adequacy of Consultation Milestone
AGS	Aldbrough Gas Storage
AHS	Aldbrough Hydrogen Storage
APFP	Applications: Prescribed Forms and Procedure
CLG	Community Liaison Group
DCO	Development Consent Orde
DLUHC	Department for Levelling Up, Housing and Communities
EIA	Environmental Impact Assessment
ERM	Environmental Resources Management
ERYC	East Riding of Yorkshire Council
ES	Environmental Statement
HGV	Heavy Goods Vehicle
HMLR	His Majesty's Land Registry
LIQ	Land Interest Questionnaire
LOQ	Landowner Questionnaire
MHCLG	Ministry of Housing, Communities and Local Government
MMO	Marine Management Organisation
PA 2008	Planning Act 2008

Acronym	Description
PEIR	Preliminary Environmental Impact Report
SCG	Single Conversation Group

1. INTRODUCTION

1.1 INTRODUCTION TO THE AOCM

1.1.1.1 This Adequacy of Consultation Milestone (AoCM) document has been prepared by Environmental Resources Management (ERM) on behalf of Aldbrough Hydrogen Storage Limited (hereafter referred to as 'the Applicant').

1.1.1.2 The Aldbrough Hydrogen Storage (AHS) Project (hereafter referred to as 'the Proposed Development') is an underground hydrogen storage facility classified as a Nationally Significant Infrastructure Project (NSIP) under Section 14(1)(c) of the Planning Act 2008 (PA 2008), which pertains to development related to underground gas storage facilities. Consequently, a Development Consent Order (DCO) is required to authorise its construction.

1.1.1.3 The AoCM is intended to support the DCO application for the Proposed Development which is located near Aldbrough and entirely within the administrative area of East Riding of Yorkshire Council (ERYC).

1.2 OVERVIEW OF THE PROPOSED DEVELOPMENT

1.2.1.1 The Proposed Development is divided into underground and above ground components, including onshore and offshore infrastructure.

1.2.1.2 The underground components comprise up to nine subsurface caverns created in the underlying salt formations using solution mining techniques. Each cavern will be connected to individual surface wellheads within the Wellhead and Leaching Area using cased and completed wells.

1.2.1.3 The principal above ground components comprise:

- a Central Processing Area which will include above ground infrastructure, such as gas metering and analysis equipment;
- a Wellhead and Leaching area connecting the caverns to the above ground facilities. During construction this area will also house the proposed drilling and leaching infrastructure; and
- an Occupied Buildings Area, which will include a control and administration building, and a workshop.

1.2.1.4 The marine infrastructure is required to facilitate the solution mining of the caverns and comprises:

- a seawater supply pipeline to the North Sea for the abstraction of seawater;
- a 'wet well' onshore that will house the seawater pumping infrastructure; and
- a brine return pipeline for the discharge of extracted brine to the North Sea.

1.3 PURPOSE OF THIS DOCUMENT

1.3.1.1 Guidance published by the Ministry of Housing, Communities and Local Government (MHCLG) and the Department for Levelling Up, Housing and Communities (DLUHC) include:

- Planning Act 2008: Pre-application stage for Nationally Significant Infrastructure Projects¹ ('the Guidance') (April 2024); and
- Nationally Significant Infrastructure Projects: 2024 Pre-application Prospectus² ('the Prospectus') (May 2024).

1.3.1.2 Both the Guidance and the Prospectus include a requirement for an AoCM document to support a DCO project application. The Prospectus outlines the contents of the AoCM document:

“Engagement in a pre-submission Adequacy of Consultation Milestone (AoCM) intended to allow early consideration of the adequacy of consultation undertaken by the applicant and minimise risk at the acceptance stage. The AoCM should be programmed to occur early enough to enable applicants to consider how to undertake any additional engagement that may be needed, but sufficiently towards the end of the pre-application stage to assess the adequacy of the consultation that has been done. To inform the AoCM, the applicant will make a written submission to the Inspectorate which establishes the consultation undertaken to date, confirms the approaches set out in the Statement of Community Consultation, and summarises the consultation responses and the way in which they are shaping the application. Importantly, it should include the views and any relevant supporting material from local authorities if available.”

1.3.1.3 This AoCM intends to fulfil the requirements of the Prospectus. It outlines how the Applicant has complied with the consultation and publicity requirements prescribed by Sections 42, 46, 47, and 48 of the PA 2008 ('PA 2008'), along with the associated provisions of The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 ('the EIA Regulations') and The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 ('the APFP Regulations') (as amended).

1.4 STRUCTURE OF THE AOCM

1.4.1.1 This AoCM sets out the following:

- **Section 1 Introduction** – the requirements for this document and how it aligns with guidance;
- **Section 2 Statement of Community Consultation (SoCC)** – the development of the Statement of Community Consultation (SoCC) and the approach to consultation;
- **Section 3 Overview of Consultation and Engagement to Date** – an overview of the consultation and engagement to date, including consultation and engagement with statutory and non-statutory stakeholders, as well as engagement with landowners, including specific subsections demonstrating the adequacy of consultation related to s42, s46, s47, and s48 of the PA

¹ Planning Act 2008: Pre-application stage for Nationally Significant Infrastructure Projects. (Online) Available at: <https://www.gov.uk/guidance/planning-act-2008-pre-application-stage-for-nationally-significant-infrastructure-projects>. [Accessed September 2025].

² Nationally Significant Infrastructure Projects: 2024 Pre-application Prospectus. (Online) Available at: <https://www.gov.uk/guidance/nationally-significant-infrastructure-projects-2024-pre-application-prospectus> [Accessed December 2025]. Published May 2024, last updated November 2025.

2008 (see Sections 3.3.2-3.3.5) and Environmental Impact Assessment (EIA) consultation (see Section 3.4);

- **Section 4 Summary of Consultation Responses** – a summary of the consultation responses and how the AHS project has taken responses into account throughout the pre-application process as a result; and,
- **Section 5 Next Steps** – the next steps regarding consultation up to submission, including a supplementary project update.

1.4.1.2 Additionally, this AoCM references several other documents that the Applicant has prepared, or is currently preparing as part of the DCO application, including the Consultation Report and Statements of Common Ground (SoCGs), as well as the Statement of Community Consultation (SoCC). However, this AoCM has been prepared as a standalone document to demonstrate the adequacy of consultation before the application is submitted.

2. STATEMENT OF COMMUNITY CONSULTATION (SOCC)

2.1 INTRODUCTION

- 2.1.1.1 This section explains the Applicant's approach to preparing the SoCC, in accordance with s47 'Duty to consult local community' of the PA 2008. Key requirements under s47 relating to the SoCC and the Applicants approach are set out below.
- 2.1.1.2 The SoCC complied with Regulation 12 of the EIA regulations. The SoCC indicated the Proposed Development was an EIA development, and that the Applicant intended to publicise and consult on the PEIR, which was prepared in accordance with regulation 14(2).
- 2.1.1.3 The Applicant undertook early engagement with ERYC, before the preparation of the SoCC, including on the intended approach to consultation, the consultation programme, and the Proposed Development more generally.

2.2 S47(1) PREPARATION OF THE SOCC

- 2.2.1.1 S47(1) requires the Applicant to prepare a SoCC setting out how it proposes to consult with residents living within the vicinity of the land to which the application relates. The Applicant prepared the SoCC as per s47(1) during April and May of 2024, following a non-statutory consultation period in September 2023.

2.3 S47(2) CONSULTATION ON THE SOCC

- 2.3.1.1 S47(2) goes on to state that in preparing the SoCC, the Applicant must consult each local authority that is within s43(1) about the content of the SoCC. S43(1) states that a local authority is within this section if the land (to which the application relates) is in the authority's area. ERYC was identified as the only relevant authority under s43(1) because the Site lies wholly within ERYC's administrative area. The Applicant submitted a draft SoCC to ERYC by email on the 12 April 2024, in accordance with s47(2).

2.4 S47(3) CONFIRMATION OF DEADLINE TO RESPOND

- 2.4.1.1 S47(3) states that the Applicant must provide the s43(1) authorities with a period of 28 days to respond to the consultation, beginning the day after the authority receives the draft SoCC. The Applicant requested that ERYC should provide comments by 10 May 2024 (28 days from the day after the draft SoCC was received), in accordance with s47(3).

2.5 S47(4) CONTENT OF THE SOCC

- 2.5.1.1 S47(4) clarifies that 'the consultation documents' mentioned in s47(3) are the specific documents provided to the local authority for the purpose of that initial consultation. The consultation document described under s47(3) was the draft SoCC and it included the following information:
- an overview of the SoCC document;
 - a statement of the Applicant's intention to submit a DCO application, and confirming it is an EIA development, and details of where to find more information about the planning process;
 - a summary of the Proposed Development;

- the purpose of the consultation and how the Applicant proposed to publicise and consult the local community on the Proposed Development and the PEIR, including identifying local press outlets;
- details of how the Applicant proposed to address comments received and incorporate into the design following the statutory consultation; and
- consultation dates and event schedule.

2.6 S47(5) FORMAL CONSULTATION ON THE DRAFT SOCC

- 2.6.1.1 S47(5) requires the Applicant to have regard to any response received before this deadline. ERYC provided a response on the 29 April 2024, which included suggestions regarding deposit locations of hard copies of the SoCC, a request to include estimated timeframes for the DCO, and details of how the Applicant could liaise with ward members. ERYC agreed with the consultation period and consultation zone included within the draft SoCC. The draft SoCC was amended to reflect all comments received from ERYC as required by s47(5), see Table 2-1 below.

TABLE 2-1 RESPONSES TO ERYC FEEDBACK ON SOCC

Comments from ERYC on SoCC	Action Taken
You may wish to consider placing a poster at Beverley Library, in addition to County Hall.	The SoCC included Beverley Library as a poster location.
You could include details of how you will liaise with ward members.	The SoCC stated that wider local stakeholders would be included in the consultation.
You might want to include an estimated timeframe for the DCO application process on page 8.	An estimated timeline for the DCO was included in the SoCC.

2.7 S47(6) PUBLICATION OF THE SOCC

- 2.7.1.1 S47(6) requires the Applicant to make the SoCC available for inspection by the public and publish a notice in a newspaper circulating within the vicinity of the land to which the application relates, stating where and when the SoCC can be inspected.
- 2.7.1.2 On 23 May 2024, the s47 notice was published in the Hornsea & Holderness Gazette and the Hull Daily Mail, both of which are newspapers circulating in the vicinity of Proposed Development, detailing when and where hard copies of the SoCC were available to view. As required by s47(6) of the PA 2008, the SoCC was accessible for viewing and downloading online and free of charge from the AHS project website (<https://www.aldbroughhydrogen.com/library>).
- 2.7.1.3 Hard copies of the SoCC were also available at the following locations:
- Beverley County Hall, Champney Road, Beverley, HU17 8HE;
 - Beverley Library, Champney Road, Beverley, HU17 8HE;
 - Hornsea Community Hub, Broadway, Hornsea, HU18 1PZ; and
 - Aldbrough Village Hall, Garton Road, Aldbrough, HU11 4QA.

2.8 REVISIONS TO THE SOCC AND RELATED PUBLICITY

- 2.8.1.1 The SoCC was revised twice following its initial publication on 23 May 2024.
- 2.8.1.2 The **first revision** followed the Government announcement on 22 May 2024 (the day before the advert was printed in press) of a General Election that was proposed to be held on 04 July 2024, which was within the planned consultation period.
- 2.8.1.3 As a result, two consultation events were rescheduled and the deadline for responding to the consultation was extended by three weeks to 18 August 2024. This allowed newly elected officials and other stakeholders additional time and opportunity to provide their comments, as well as ensuring government bodies had sufficient time to respond given purdah during the election period.
- 2.8.1.4 The SoCC was revised to reflect changes to the dates of two events and the extension. The SoCC stated that changes to dates of events and the consultation process may occur, and that if this happens, the Applicant would communicate any changes to the list of stakeholder and community groups.
- 2.8.1.5 Therefore, the s47 notice was updated and the revised notice was published in the Hornsea & Holderness Gazette and the Hull Daily Mail for two consecutive weeks on 30 May 2024 and 06 June 2024. ERYC was notified by email and provided no further response. The revised SoCC was then placed on the AHS project website, and provided in hard copy at the locations set out in paragraph 2.7.1.3, aligning with the process set out in the SoCC.
- 2.8.1.6 A **second revision** was made on 25 July 2024 to include an extension to the consultation period to 31 August 2024. This extension was intended to allow adequate time to respond to s48 notices, after an omission was identified in relation to the publication of these notices – See 3.3.5 below. It also allowed additional time for all other consultees to respond to the consultation, including those identified under s42 who had not yet responded. The SoCC was updated to reflect this extension.
- 2.8.1.7 Following the second revision, an updated s47 notice was not publicised in press outlets because the change related solely to the close of consultation (and was driven by the need to comply with s48), and it was felt that the existing SoCC was adequate and the extension could be communicated effectively without a new s47 notice.
- 2.8.1.8 Instead, the SoCC included a process for notifying consultees of updates to the SoCC, as noted above in paragraph 2.8.1.4. The Applicant communicated the changes to the consultation (i.e. the extension of the consultation period) by placing the updated version of the SoCC on the AHS project website, replacing hard copies in local venues, and notifying ERYC of the revision via email. The Applicant subsequently undertook local community consultation in accordance with the SoCC.

2.9 S47(7) COMPLIANCE WITH THE SOCC

- 2.9.1.1 S47(7) requires the consultation to be carried out in accordance with the proposals set out in the SoCC. The Applicant undertook the statutory public consultation in accordance with the published SoCC as required by s47(7). **Table 2-2** below describes how the Applicant has complied with commitments set out in the SoCC.

TABLE 2-2 SOCC COMMITMENTS AND APPLICANT COMPLIANCE

SoCC Activity	Approach Set Out in the SoCC	Activities Delivered			
Consultation period	The SoCC confirmed a consultation period, starting on 17 June 2024 to 31 August 2024.	The statutory consultation period ran for 11 weeks from 17 June 2024 to 31 August 2024. This included two extensions, the first due to the General Election on 04 July 2024, and the second to correct an omission that had been identified in relation to the publication of the s48 notices. The SoCC was updated to reflect the extended consultation period. It was re-issued on the AHS project website and ERYC was informed by email each time.			
Consultation area	The SoCC defined a consultation zone for engagement.	The Applicant reached residents in the target consultation zone using various methods (see below). Communities beyond the consultation zone were also reached via notices, adverts, posters, and the project website.			
Flyers, notices, adverts, and posters	The statutory consultation was publicised by placing adverts in local newspapers circulating across the consultation zone for two consecutive weeks. The local newspapers were identified in the SoCC.	Type			
		Location	Duration	Publication Date	
		S47 notice	Hornsea & Holderness Gazette	3 weeks	<ul style="list-style-type: none"> • 23 May 2024 • 30 May 2024 • 06 June 2024
			Hull Daily Mail	3 weeks	<ul style="list-style-type: none"> • 23 May 2024 • 30 May 2024 • 06 June 2024
		Adverts to publicise consultation	Hornsea & Holderness Gazette	1 week	<ul style="list-style-type: none"> • 06 June 2024
			Hull Daily Mail	1 week	<ul style="list-style-type: none"> • 06 June 2024
			The Yorkshire Post	3 weeks	<ul style="list-style-type: none"> • 03 June 2024 • 02 July 2024 • 09 July 2024

SoCC Activity	Approach Set Out in the SoCC	Activities Delivered			
		Consultation flyer	Posted to 2,602 residential and business addresses	Once	<ul style="list-style-type: none"> • 10 to 17 June 2024
		S48 notice (Local press)	Hornsea & Holderness Gazette	2 weeks	<ul style="list-style-type: none"> • 25 July 2024 • 01 August 2024
			Hull Daily Mail	2 weeks	<ul style="list-style-type: none"> • 26 July 2024 • 02 August 2024
		S48 notice (National press)	The Times	1 week	<ul style="list-style-type: none"> • 1 August 2024
			The London Gazette	1 week	<ul style="list-style-type: none"> • 31 July 2024
			Lloyds List	1 week	<ul style="list-style-type: none"> • 29 July 2024
			The Fishing News	1 week	<ul style="list-style-type: none"> • 01 August 2024
		Poster & s48 notice	Poster locations (outlined in Section 5.8.6 of the SoCC)*.	11 weeks	<ul style="list-style-type: none"> • 17 June 2024 to 31 August 2024
Public consultation events	Held six in-person drop-in events in public locations within the vicinity of the Proposed Development in Aldbrough, Sproatley and Garton.	<p>Six drop-in events were held on the following dates:</p> <ul style="list-style-type: none"> • 06 July 2024 (Aldbrough Village Hall) • 09 July 2024 (Garton Meadows, East Village Meadows) • 10 July 2024 (Sproatley Village Hall) • 11 July 2024 (Aldbrough Village Hall) • 12 July 2024 (Sproatley Village Hall) • 18 July 2024 (Garton Meadows, East Village Meadows) <p>Some event dates were altered from the first published SoCC because of the General Election taking place on 04 July 2024.</p>			
Provision of consultation documents and materials	Provision of consultation documents and materials for inspection at publicly	Copies of the SoCC and consultation brochure were placed in local venues. The project website hosted all the consultation documents, including the PEIR, non-technical summary, consultation brochure,			

SoCC Activity	Approach Set Out in the SoCC	Activities Delivered
	<p>accessible venues within the consultation zone.</p> <p>Online copies of consultation documents to view or download.</p>	<p>consultation feedback form, consultation poster, FAQs and s48 notice. It provided information on how people could provide comments, feedback and request copies of consultation documents and materials via freepost, email, phone number, through the online exhibition, or in person at the live events. The website also hosted an online version of the feedback form.</p>
Project website	<p>A project website was established and is being used to host the consultation materials and to provide information on how people could provide comments and feedback and request information. People were also able to complete the feedback form on the website.</p>	<p>The project website was established before the consultation process. The project website was updated throughout the consultation period. It provided details on how people could engage with the consultation and provide feedback and included copies of all consultation documents.</p>
Contact information	<p>The Applicant provided a phone contact, freepost address and email address for communities to provide feedback or request information from the project team.</p>	<p>The following contact methods were provided to receive queries/information requests:</p> <ul style="list-style-type: none"> • phone: 01865 384980 (voicemail based) • post: Freepost Aldbrough Hydrogen Storage • email: AHS@ERM.com
Recording, analysis and reporting	<p>All feedback received in response to the consultation will be considered by the project team and will be taken account of during the</p>	<p>Comments and feedback have been recorded and collated in a response tracker and coded and analysed. The consultation report collates feedback and forms part of the application for development consent.</p>

SoCC Activity	Approach Set Out in the SoCC	Activities Delivered
	<p>application process for the DCO.</p> <p>The Applicant will have regard to the issues/matters raised and identify where these have resulted in changes to the Proposed Development and application for development consent.</p> <p>This will be documented in a consultation report.</p>	

2.10 DIFFERENCES IN APPROACH FROM THE PUBLICISED SOCC

2.10.1.1 There was one difference in approach from the publicised SoCC. This relates to poster locations. The SoCC named several poster locations. It became apparent during the non-statutory consultation period that the Applicant was unable to access some poster locations and one no longer existed. In some cases, copies of posters were sent to parish councils to be placed on community notice boards, although the Applicant did not receive confirmation or evidence during the consultation period that the poster was successfully placed. This was despite attempts to reach parish council clerks by the Applicant. Each difference to planned poster locations is explained below:

- Grimston (part of East Garton Parish) Notice Board (unable to access).
- Sproatley Parish Council Notice Board (Poster supplied but placement not confirmed).
- Withernwick Parish Council Notice Board (Poster supplied but placement not confirmed).
- Bilton Post Office (closed down).
- Roos Parish Council Notice Board (Poster supplied but placement not confirmed).

2.10.1.2 The Applicant is satisfied that sufficient attempts were made to access poster locations and the posters confirmed as placed were adequate. An audit trail recorded the number of attempts to visit noticeboards and reach parish council clerks. There were no known available alternative poster locations.

2.10.1.3 With the exception of the difference noted above, all other elements of the SoCC have been complied with. The Applicant is confident that it has complied with its duty to carry out community consultation in accordance with its proposals in the SoCC.

3. OVERVIEW OF CONSULTATION AND ENGAGEMENT TO DATE

3.1 INTRODUCTION

3.1.1.1 The Applicant has conducted extensive pre-application consultation in an iterative manner in preparing its DCO application. This included early engagement with stakeholders and the local community to introduce the Proposed Development through the Aldbrough Community Liaison Group (CLG). It included a period of non-statutory consultation, and a period of statutory consultation intended to meet the requirements set by the PA 2008 and the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (EIA Regulations).

3.1.1.2 In addition to the consultation outlined above, regular meetings were held with ERYC and the Single Conversation Group (SCG). Focused technical engagement regarding specific issues and environmental topics has also been undertaken with various statutory consultees, such as Natural England and the Environment Agency.

3.1.2 EARLY ENGAGEMENT THROUGH THE COMMUNITY LIAISON GROUP

3.1.2.1 The CLG was established in 2006 by SSE (the operator of the Aldbrough Gas Storage facility) to engage with the community. It comprises local representatives, initially from Aldbrough Gas Storage but now also other developers e.g. (those representing Aldbrough Hydrogen Storage and Aldbrough Pathfinder) and members of the public are welcome to attend and observe the proceedings. The CLG generally meets either monthly or bi-monthly, to ensure that the operation and maintenance activities at the existing Aldbrough Gas Storage (AGS) facility are not unduly impacting on the local community. The Proposed Development was introduced to the CLG in September 2021 and progress updates have been provided regularly in subsequent meetings.

3.1.2.2 CLG meeting minutes³ are available to view online. A set of questions was also prepared by the CLG and submitted to the Applicant, relating to the Proposed Development and the Applicant subsequently prepared a frequently asked questions (FAQs) document in response, which is available to view on the project website⁴.

3.2 NON-STATUTORY CONSULTATION

3.2.1.1 A non-statutory public consultation took place over four weeks between 04 September to 29 September 2023. The non-statutory public consultation focused on people, businesses, community organisations, and elected representatives living within the vicinity of the Site and who may be affected by the Proposed Development.

3.2.1.2 The 'vicinity' in this case, referred to as the consultation zone, was defined as the six parishes immediately surrounding the Site and in close proximity to the planned traffic route for the Proposed Development (the B1238):

³ SSE Thermal (2024). Community Liaison Group Meeting Minutes. (Online) Available at: <https://www.ssethermal.com/energy-storage/aldbrough>. [Accessed September 2025].

⁴ SSE Thermal (2023). Aldbrough Community FAQ's (Online). Available at: <https://static1.squarespace.com/static/624efcd615aed55907aefc52/t/66ab76445b79ce19fc3795a8/1722512965858/Aldbrough+Frequently+Asked+Questions+-+CLG.pdf>. [Accessed September 2025].

- Aldbrough;
- Bilton;
- East Garton;
- Humbleton;
- Sproatley; and
- Withernwick.

3.2.1.3 The consultation zone was determined based on the available project information at the time, including consideration of likely traffic impacts and feedback from early engagement. The extent of likely significant effects was considered to be limited to these parishes immediately surrounding the Site. Residents and interested parties outside the consultation zone could also participate in the consultation and would be reached through press adverts and posters in locations outside the consultation zone.

Non-Statutory Consultation Methods

- 3.2.1.4 Flyers advertised the non-statutory consultation on the Proposed Development and explained how to participate in person or online, and how to provide feedback. Flyers were delivered to over 2,600 households in the consultation zone and copies were placed in key locations surrounding the consultation zone, listed below:
- Aldbrough Post Office;
 - Sproatley Post Office; and
 - Aldbrough Village Hall.
- 3.2.1.5 Posters advertised the non-statutory consultation for the Proposed Development, detailing how to participate both in person and online, as well as how to provide feedback. Posters were displayed within and surrounding the consultation zone.
- 3.2.1.6 Press adverts were published online and in the printed press to advertise the non-statutory consultation on the Proposed Development. The advert was published in:
- Hull Daily Mail, 31 August 2023; and
 - Hornsea & Holderness Gazette, 31 August 2023.
- 3.2.1.7 Press articles were also promoted through digital advertising throughout the consultation period via 'Hull Live' and 'InYourArea' to target audiences geographically and online.
- 3.2.1.8 The project website (<https://www.aldbroughhydrogen.com/>) hosted information regarding the Proposed Development and included a 'Public Consultation Event Information' page, with information on the consultation, details of in-person events and a link to the consultation platform, described below. The URL to the project website (and QR code) was included in all printed and online communications, such as the flyer, poster, and press adverts.
- 3.2.1.9 The online consultation platform (www.yourvoiceerm.com/aldbrough-hydrogen-storage) hosted the information on the Proposed Development. The platform included a feedback form for those who wished to provide feedback online. The

platform also included details of in-person events, contact details, and downloadable versions of the Scoping Report and Scoping Opinion.

- 3.2.1.10 Three in-person events were held to provide the public with an opportunity to view the consultation materials, meet the team in person and provide their feedback. Locations were identified local to the Site and close to settlements and communities within the consultation zone. The events were held at the following venues:
- Wednesday 13 September 2023, 2pm - 7pm: East Village Meadows, Garton, HU11 4QB;
 - Thursday 14 September 2023, 2pm – 7pm: Aldbrough Village Hall, Garton Rd, Aldbrough, HU11 4QA; and
 - Friday 15 September 2023, 1pm - 6pm: Sproatley Village Hall, Sproatley Road, HU11 4PR.
- 3.2.1.11 The events were held at different locations and different dates, to encourage the general public and stakeholders to attend. The timing of the events was also designed to capture workers and non-workers by running through the afternoon and into the evenings. Consultation banners were displayed at the events and included relevant information of the Proposed Development. These included:
- details of in-person consultation events;
 - a summary of the EIA scoping process;
 - details of consultation to-date; and,
 - a proposed timeline.
- 3.2.1.12 The deadline for sharing feedback on the non-statutory consultation was 11:59pm, 29 September 2023. This deadline was clearly stated in all consultation materials.
- 3.2.1.13 Stakeholders and members of the public were able to respond to the consultation in the following ways:
- email: [REDACTED].com;
 - phone: [REDACTED]
 - online feedback form (www.yourvoiceerm.com/aldbrough-hydrogen-storage), accessible via the project website (www.aldbroughhydrogen.com); and
 - verbal feedback at the in-person consultation events.
- 3.2.1.14 In order to allow feedback to be fully taken into account, ERM collated and coded all feedback received through 60 completed feedback forms, verbal feedback from 66 people who attended the three events, feedback submitted via the CLG and other submissions supplied by email and letter. A summary of the consultation responses is provided in Section 4.1 below.

3.3 STATUTORY CONSULTATION

- 3.3.1.1 The Applicant undertook pre-application consultation in accordance with sections 42 (Duty to consult), 46 (Duty to notify Secretary of State of proposed application), 47 (Duty to consult local community), 48 (Duty to publicise), 49 (Duty to take account of responses to consultation and publicity), 50 (Guidance

about pre-application procedure) and 51 (Advice for potential applicants and others) of the PA 2008, with the following consultees:

- Prescribed bodies in accordance with s42;
- Local authorities in accordance with s42 and as described in s43;
- Those with an interest in the land in accordance with s42 and as described in s44;
- Community and stakeholders living in the vicinity of the Proposed Development in accordance with s47; and
- Wider communities and organisations by publicising the consultation in accordance with s48.

- 3.3.1.2 The Applicant conducted statutory consultation on the Proposed Development including the PEIR from 17 June 2024 to 31 August 2024.
- 3.3.1.3 The Applicant conducted consultation under s42, s47 and s48 of the PA 2008 and Regulation 13 of the EIA Regulations 2017 (Pre-application publicity under s48 (duty to publicise)) in parallel.
- 3.3.1.4 All consultation materials (the PEIR, consultation brochure, consultation feedback form, consultation poster, s47 notice and s48 notice) required under s47 and s48 of the PA 2008 were made available to consultees under s42 of the PA 2008 and Regulation 13 of the EIA Regulations 2017. This is set out in additional detail below.

3.3.2 STATUTORY CONSULTATION UNDER S42 OF PA 2008

- 3.3.2.1 S42 'Duty to consult' of the PA 2008 requires the Applicant to consult with prescribed consultees under s42(1). The list of s42(1) consultees was augmented with additional bodies who were notified of the proposed application by the Planning Inspectorate under Regulation 11(1) of EIA Regulations. Consultation with the Marine Management Organisation took place under s42(1)(aa). The Greater London Authority was not consulted since the Proposed Development was outside of Greater London (s42(1)(c)). The Applicant complied with s42 of the PA 2008, explained below.

S42(1)(a) – 'such persons as may be prescribed'

- 3.3.2.2 S42(1)(a) of the PA 2008 requires the Applicant to consult with such entities as may be prescribed. The Applicant consulted all relevant prescribed consultees set out in Schedule 1 of the Applications: Prescribed Forms and Procedure (APFP) Regulations⁵, in accordance of Regulation 3 of those regulations. These include the main statutory bodies required to be consulted under s42(a).
- 3.3.2.3 The list of consultees and the contact information was cross-referenced with the list of bodies who were notified of the proposed application by the Planning Inspectorate under Regulation 11(1) of the Infrastructure Planning (EIA) Regulations.

⁵ U.K. Government (2009). The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009. (Online) Available at: <https://www.legislation.gov.uk/uksi/2009/2264/schedule/1/made>. [Accessed September 2025].

- 3.3.2.4 Following statutory consultation, Planning Inspectorate feedback on the drafted DCO documents identified further ‘relevant’ parish councils to be included. The following additional parish councils were identified:
- Burton Constable Parish Council;
 - Elstronwick Parish Council;
 - Mappleton Parish Council; and
 - Roos Parish Council.
- 3.3.2.5 Each additional parish council was sent a letter via post and email on the 06 May 2025, notifying them that they were being consulted under s42 of the PA 2008. The emails were sent with delivery and read receipts requested. The letter and email informed the consultees that the additional consultation commenced on 12 May 2025 and closed at 11.59pm on 09 June 2025, a period of 28 days. The letter informed the parish councils how to view consultation materials on the project website, and how to submit a response (via email to AHS@ERM.com). Each parish council was subsequently contacted by phone to confirm that they had received the communication and whether they required any other information in order to respond. The s48 notice was included with the letter and email, stating that the s48 notice was included to comply with statutory obligations.
- 3.3.2.6 The full list of prescribed bodies will be included as an Appendix to the Consultation Report.

S42(1)(b) – ‘each local authority that is within section 43’

- 3.3.2.7 S42(1)(b) of the PA 2008 requires the Applicant to consult with the relevant local authorities identified in s43 of the Act. The relevant local authorities consulted under s42(1)(b) are:
- “Category A” authorities:
 - City of Doncaster Council;
 - City of York Council;
 - Hull City Council;
 - North Lincolnshire Council; and
 - North Yorkshire Council.
 - “Category B” authorities:
 - ERYC.
- 3.3.2.8 There are no other local authorities identified in s.43 that the Proposed Development is located within or is bordering.

S42(1)(c) – ‘the Greater London Authority if the land is in Greater London’

- 3.3.2.9 Not consulted since the land is outside of Greater London Authority.

S42(1)(d) – ‘each person who is within one or more of the categories set out in section 44’

- 3.3.2.10 S42(1)(d) of the PA 2008 includes persons with land ownership interests falling within Categories 1, 2 and 3 of s44 of the PA 2008. The Applicant appointed Dalcour Maclaren to complete the process of diligent inquiry prior to, throughout, and following the statutory consultation to identify relevant persons with an interest in land and carry out the land referencing as required.
- 3.3.2.11 At the beginning of the project, Dalcour Maclaren obtained land ownership information from His Majesty’s Land Registry (HMLR). This allowed the Applicant to identify registered titles and obtain all official documents. Based on this data, introduction letters and Land Owner Questionnaires (LOQs) were issued to those with identified interests.
- 3.3.2.12 Following this, and in the run up to the statutory consultation, Land Interest Questionnaires (LIQs) were mailed to all identified interests from 09 January 2024. LIQs are more detailed than LOQs. Their purpose is to identify and confirm all land interests that may be affected by the Proposed Development.
- 3.3.2.13 Unregistered land interests were identified, where possible, by using public sources of information and erection of site notices.
- 3.3.2.14 When there was no response to the issued LIQs, Dalcour Maclaren followed up with LIQ reminder letters. Following reminder letters, Dalcour Maclaren undertook diligent inquiry by issuing emails, making telephone calls and completing site visits to obtain LIQ responses.
- 3.3.2.15 Site visits and discussions about adjoining land interests were also undertaken to request information on the ownership of unregistered parcels of land.
- 3.3.2.16 Some land interests were added or removed during the land referencing process based on the information obtained. When new land interests were identified through contact referencing, LIQ form completion and / or correspondence with land interests, additional LIQs were issued to such new land interests.

S45 - Timetable for Consultation Under S42

- 3.3.2.17 S45(1) of the PA 2008 provides that the Applicant must, when consulting a person under s42, notify the person of the deadline for the receipt by the Applicant of the person’s response to the consultation. The decision to extend the consultation period to 18 August 2024 following the announcement of the General Election was made before s42 consultees were contacted.
- 3.3.2.18 The Applicant emailed consultees identified under s42 on 13 June 2024, to inform them of the consultation starting on 17 June 2024. The email included the means and deadline for providing their responses by 18 August 2024 signposting them to the consultation materials online. A hard copy letter and the s48 notice was also issued on the same day to s42 consultees via Royal Mail on the 13 June 2024.
- 3.3.2.19 A reminder email notification was sent to s42 consultees on 08 July 2024. The email reminded consultees of the consultation, upcoming consultation events, and requested feedback by 18 August 2024. The s48 notice was attached. The emails were sent with delivery and read receipts requested. Alternative email addresses were identified where any prescribed consultees did not provide a

delivery or read receipt. Ultimately, all prescribed consultees received the notification with a delivery or read receipt recorded by the Applicant.

- 3.3.2.20 A further email was issued to s42 consultees on 25 July 2024, to confirm that the deadline for receipt of responses had been extended to 31 August 2024 to reflect the extension to the consultation. A copy of the s48 notice was attached with the revised consultation deadline.
- 3.3.2.21 Where additional land interests were subsequently identified under s44, they were contacted in writing, ensuring that a minimum of 28 days was provided for comments on the consultation materials. Where owners, lessees, tenants, occupiers or other land interests were unknown (there were 28 unknown interests in total), s48 notices were placed at nine relevant locations within the consultation zone, providing details on the consultation. The notices were on display for 75 days and removed on 30 August 2024. In total, 76 known land interests were contacted and received the s48 notices, of 104 known and unknown land interests.
- 3.3.2.22 S45(2) states that a deadline notified under subsection (1) must not be earlier than the end of the period of 28 days that begins with the day after the day on which the person receives the consultation documents. As outlined in the previous paragraphs, the statutory consultation period exceeded these requirements.
- 3.3.2.23 S45(3) states that in subsection (2) “the consultation documents” means the documents supplied to the person by the applicant for the purpose of consulting the person. The consultation documents provided to s42 consultees comprised of:
- An email including a summary of the Proposed Development, information signposting to consultation materials online (which included the PEIR and non-technical summary, consultation brochure, consultation feedback form, consultation poster, FAQs and s48 notice), how the materials could be viewed, and the means and deadline for responding to the consultation.
 - A hard copy letter was also issued on the same day comprising the same information in the email, as above, and a copy of the notice publicising the application under s48 of the PA 2008 (including details of the public consultation events and the locations where the consultation documents could be inspected free of charge).
 - A reminder email notification was sent to s42 consultees on 08 July 2024. The email reminded consultees of the consultation start and end dates, and requested comments. It included a copy of the notice publicising the application under s48 of the PA 2008.
 - A further reminder email notification was sent to s42 consultees on 25 July 2024. The email reminded consultees of the consultation start and updated end dates (to 31 August 2024) and requested comments. It also included a copy of the notice publicising the application under s48 of the PA 2008.

3.3.3 NOTIFICATION UNDER S46

- 3.3.3.1 S46 of the PA 2008 places a duty on the Applicant to notify the Secretary of State (SoS) of the s42 consultation that it will undertake. The Applicant must comply with this requirement either before or at the same time as commencing

the s42 consultation. In doing so, the Applicant must send the same information that is to be provided to the s42 consultees to the SoS.

3.3.3.2 In accordance with s46, the Planning Inspectorate was notified of the start of the statutory consultation by the Applicant (sent by e-mail) on 17 June 2024, at the commencement of the statutory consultation. The notice set out the background to the Proposed Development, the Applicant's intention to submit a DCO application, details of the consultation documents, notification that the documents would be issued to consultees under s42 of PA 2008, and a summary of the consultation process. The following documents were submitted with the s46 notification:

- an example of the letter sent to consultees identified under s42; and
- a copy of the s48 notice.

3.3.3.3 The Applicant received an automatic acknowledgement of the receipt of its notification under s46 of PA 2008 from the Planning Inspectorate on the 17 June 2024.

3.3.4 COMMUNITY CONSULTATION UNDER S47

3.3.4.1 Section 2 above details how the Applicant has complied with the provisions of s47 of the PA 2008.

3.3.5 S48 NOTICES

3.3.5.1 S48 'duty to publicise' of the PA 2008 requires the Applicant to publicise a proposed application for development consent in the 'prescribed manner'. This is set out in APFP⁶ Regulation 4 'Publicising a proposed application' (as amended by the 2020 Regulations). APFP⁶ Regulation 4(2) states that the Applicant must publish a notice of the proposed application:

- for at least two successive weeks in one or more local newspapers circulating in the vicinity in which the Proposed Development would be situated;
- once in a national newspaper;
- once in the London Gazette, and, if land in Scotland is affected, the Edinburgh Gazette; and
- where the proposed application relates to offshore development once in Lloyd's List; and once in an appropriate fishing trade journal.

3.3.5.2 **Table 3-1** lists the publications and dates for s48 notices. Publication dates are provided for each publication.

TABLE 3-1 S48 NOTICES PLACED IN RELEVANT PUBLICATIONS

Publication	Publication Dates
Hornsea & Holderness Gazette	<ul style="list-style-type: none"> • 25 July 2024 • 01 August 2024

⁶ U.K. Government (2009). The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009. (Online) Available at: <https://www.legislation.gov.uk/uksi/2009/2264/schedule/1/made>. [Accessed September 2025].

Publication	Publication Dates
Hull Daily Mail	<ul style="list-style-type: none"> • 26 July 2024 • 2 August 2024
The London Gazette	<ul style="list-style-type: none"> • 31 July 2024
Lloyds List	<ul style="list-style-type: none"> • 29 July 2024
The Fishing News	<ul style="list-style-type: none"> • 01 August 2024
The Times	<ul style="list-style-type: none"> • 01 August 2024

3.3.5.3 An earlier s48 notice was first publicised in The Times, The London Gazette, Lloyds List and The Fishing News in June 2024 to coincide with the start of the statutory consultation. Subsequently it was identified that s48 notices had not been published in local publications for two successive weeks due to an omission. As a result, a decision was taken to publish the s48 notices in local publications to correct this omission, and to re-publish the s48 notices in the national publications at the same time to ensure that consultation was fully in accordance with the requirements of s48. The deadline for the consultation was also extended from 18 August 2024 to 31 August 2024 to allow 28 days (from the day after the date when the notice appeared in local publications) for consultees to respond to the notices. This also meant that the consultation extended through the summer months. The extension was also communicated to s42 consultees and ERYC, as noted earlier.

3.4 ENVIRONMENTAL IMPACT ASSESSMENT (EIA) CONSULTATION

3.4.1 EIA SCOPING

3.4.1.1 The Applicant submitted their Regulation 8 Notification on 31 May 2023, requesting a formal Scoping Opinion from the Planning Inspectorate. The Regulation 8 Notification was accompanied by an EIA Scoping Report containing the relevant information required under Regulation 10 of the EIA Regulations.

3.4.1.2 The Planning Inspectorate, on behalf of the SoS, issued its Scoping Opinion for the Proposed Development on 11 July 2023. The Scoping Opinion included a list of consultation bodies that were notified of the Applicant's EIA Scoping Opinion request under EIA Regulation 11(1)(a).

3.4.1.3 Scoping responses from prescribed consultees were received by the Planning Inspectorate to help formulate their Scoping Opinion. These comments from prescribed consultees were taken into account during the development of the PEIR and are being taken into account during the development of the Environmental Statement (ES).

3.4.2 PREPARATION AND PUBLICATION OF THE PEIR

3.4.2.1 The EIA Scoping Opinion was used to inform the Applicant's preparation of the PEIR for the Proposed Development. The preparation of the PEIR was also informed by dialogue between the Applicant's environmental consultants (ERM), the host local authority, ERYC, and key technical consultees such as the

Environment Agency, Natural England, and the Marine Management Organisation.

3.4.2.2 The PEIR was prepared and made available by the Applicant on 17 June 2024 as part of the consultation materials during statutory consultation. In compliance with Regulation 13 of the EIA Regs, the s48 notice was sent to EIA consultation bodies at the same time. The letters sent to the s42 consultees and non-prescribed consultees provided details of how the PEIR could be viewed in electronic format online (i.e. on the project website) and hard copy form (i.e. at events).

3.4.3 PREPARATION AND FINALISATION OF THE ES

3.4.3.1 Following the publication of the PEIR and the receipt of responses which addressed environmental matters, the Applicant's environmental consultants have continued to engage with ERYC and key technical consultees in respect of the preparation and finalisation of the ES, which will form part of the application for a DCO.

4. SUMMARY OF CONSULTATION RESPONSES

4.1 COMMUNITY RESPONSES – NON-STATUTORY CONSULTATION

4.1.1.1 Feedback was received over a four-week period, from 4 September until 29 September 2023. ERM collated and coded all feedback received through 60 completed feedback forms, verbal feedback from 66 people who attended the three events, feedback submitted via the CLG and other submissions supplied by email and letter. The feedback has been summarised in the sections below and will be set out in more detail in the Consultation Report.

4.1.2 OVERALL SUPPORT

4.1.2.1 Overall feedback for the Proposed Development is mixed. Evidence from completed feedback forms demonstrates a range of sentiments, including some negative feedback and concerns. Specifically, 33 respondents disagreed or strongly disagreed with the statement, "*I am supportive of the project,*" while 36 respondents agreed or strongly agreed with the statement, "*I am concerned about the project.*"

4.1.2.2 Fourteen respondents agreed or strongly agreed that they support the project, highlighting its role in decarbonising the UK and enhancing energy security in their open-ended comments.

4.1.2.3 These sentiments reflect the views of individuals who completed a feedback form (60 responses) and does not necessarily represent the opinions of all participants in the consultation (approximately 230 engaged online and 65 attended events in person).

4.1.3 FEEDBACK ON ENVIRONMENTAL TOPICS

4.1.3.1 Feedback was provided on several EIA topics. The feedback is summarised below, and is being taken into account as part of the preparation of the ES:

- **Traffic and Transport:** Concerns focused on increased Heavy Goods Vehicles (HGV) movements, construction traffic during evenings and weekends, road safety, pollution, and damage. Communities requested mitigation such as traffic restrictions during sensitive times, pedestrian infrastructure, speed controls, and improved public transport links.
- **Noise and Vibration:** Feedback highlighted noise impacts on ecology, amenity, businesses, and livestock, with particular concern around drilling and nighttime operations. Suggestions included acoustic barriers, limited working hours, and a designated contact for complaints.
- **Major Accidents and Hazards:** Respondents raised concerns about flaring, gas leaks, explosions, cavern integrity, and site security. People asked for robust safety plans and clear communication on emergency procedures.
- **Ecology and Nature Conservation:** Concerns were raised about construction impacts on terrestrial and marine ecology, including noise, lighting, and brine discharge. Communities proposed habitat creation, ecological monitoring, and community ownership of woodland areas.
- **Landscape and Visual Impacts:** Feedback focused on visual screening and lighting effects. Requests included mature tree planting and expansion of woodland to improve landscape integration.

- **Socio-economics:** Concerns centred on potential disruption to local businesses. Consultees advocated for local employment, investment in training, and financial support through a community fund.
- **Human Health:** Respondents expressed concern about mental health, wellbeing, and disruption to recreation assets. They requested protection of walking and riding routes and access to a point of contact.
- **Cumulative Impacts:** There was confusion about the relationship between the Proposed Development and nearby projects. Communities called for greater transparency and clearer information on interdependencies between projects.

4.1.4 OTHER FEEDBACK RAISED DURING NON-STATUTORY CONSULTATION

4.1.4.1 Other feedback raised during non-statutory consultation can be summarised as:

- **Understanding the Proposed Development:** Concerns were raised about the design and layout of the caverns, as well as uncertainty around the associated pipeline and decommissioning phase. Communities requested clear information on hydrogen production and storage, the UK energy context, and specific aspects of the Proposed Development where uncertainty remains.
- **Need for the Proposed Development:** Feedback was mixed, with some support expressed and others questioning the environmental credentials of the project, particularly the use of blue hydrogen over green alternatives.
- **Community Impacts:** Concerns focused on broader industrialisation of the countryside and potential negative effects on property values. Suggestions included measures such as establishing a community fund.

4.2 STATUTORY CONSULTATION RESPONSES

4.2.1.1 The Applicant is mindful of its duty to take account of responses to consultation and publicity, in accordance with s49 of the PA2008. This section provides a summary of the feedback received. The Consultation Report, which will be submitted in support of the DCO application will include further information of how that feedback has shaped and informed the design of the Proposed Development.

4.2.2 RESPONSES RECEIVED UNDER S42

S42(1)(a) – ‘such persons as may be prescribed’

4.2.2.2 The Applicant asked consultees to provide responses to consultation under s42 of the PA 2008. The Applicant received 18 responses from consultees under s42(1)(a) of the PA 2008 (including the Marine Management Organisation (MMO) under s42(1)(aa)). A more detailed summary of responses will be included in the Consultation Report, together with the Applicant’s regard to comments. Key subjects raised were:

- water, flood risk and coastal erosion;
- noise;
- traffic and transport;

- geology, hydrology and ground conditions;
- ecology;
- marine environment;
- waste;
- landscape and visual impact;
- cultural heritage;
- hazards and safety;
- socio-economic considerations; and
- human health.

S42(1)(b) – ‘each local authority that is within section 43’

4.2.2.3 The Applicant received responses from three consultees identified under s42(1)(b) of the PA 2008. A more detailed summary of responses will be included in the Consultation Report, together with the Applicant’s regard to comments. Key subjects raised were:

- water and coastal erosion;
- noise, vibration, air quality and waste;
- geology, hydrology and ground conditions;
- ecology and nature conservation;
- protected sites, species and habitats;
- biodiversity;
- trees and landscape;
- best and most versatile agricultural land;
- landscape, seascape and visual;
- cultural heritage;
- traffic and transport;
- cumulative effects;
- public right of way; and
- human health.

S42(1)(d) – ‘each person who is within one or more of the categories set out in section 44’

4.2.2.4 The Applicant received a response from a consultee, under s42(1)(d) of the PA 2008, relating to the circumstances under which a person would be entitled to make a claim for compensation under s10 of the Compulsory Purchase Act 1965 and/or Part 1 of the Land Compensation Act 1973 and/or s 152(3) of the PA 2008, and who the claim would be made to. The Applicant provided a response explaining that, as the consultee was identified as a Category 3 interest under Section 44 of the Planning Act 2008, they may be entitled to make a claim as a result of the implementation of the Development Consent

Order (DCO). The applicant clarified that the developer would be the responsible authority to whom the claim should be made.

4.2.3 RESPONSES RECEIVED UNDER S47

4.2.3.1 The consultation platform analytics demonstrate that over 230 unique individuals engaged with the consultation online, although the majority did not return feedback and 37 feedback forms were completed. Some participants engaged more actively by attending events (62 people). Those responding by email (6 responses) appeared to be people living closest to the project.

4.2.3.2 Overall, people understood the need for the project and several people recognised the need for low carbon energy solutions. Around 20 comments were made on the site location. Several people recognised the reasoning behind the selection of the site, based on geological factors, site ownership, and presence of existing gas storage assets. However, many people also commented that this was not a suitable location due to the rural nature, road access and local tourism context. There was an overall sentiment that people understood the need to decarbonise however it was believed that this small rural community could be disproportionately affected, and the project will industrialise the coastal and countryside location.

4.2.3.3 Key themes and subjects raised in relation to PEIR topics were:

- concerns about visual impact and industrialisation of the countryside was one of the most commonly raised topics, (56 comments) with:
 - 26 comments on visual impact;
 - 19 specifically mentioning industrialisation of the countryside; and
 - 8 mentioned how the visual impact/ industrialisation will affect the nature of the place and key assets, such as the King Charles III England Coast Path.
- noise and vibration were commonly raised with 44 comments on:
 - the construction phase including construction traffic and drilling (29 comments); and
 - 15 comments specifically mentioned the proposed 24-hour drilling.
- traffic, transport and access issues were commonly raised and featured highly in verbal feedback at events, with 37 written comments;
- light pollution was raised (with 19 comments);
- impacts on ecology was also raised (with 18 comments); and
- other commonly raised topics included safety (10 comments) Biodiversity Net Gain (9 comments), coastal erosion (7 comments), and air quality (3 comments).

4.2.3.4 Responses to quantitative feedback from the closed questions on the feedback form were also analysed. Most respondents strongly agreed, agreed or were neutral on their understanding of the Proposed Development and its role in decarbonising the Humber in their response. The same is true regarding their understanding of the planning and approval process. This supports qualitative feedback, where people understand the need for the project and benefits to society at large, and have some understanding of the planning process, but feel

this community and place is disproportionately affected by 'industrialisation of the countryside'.

4.2.3.5 Following feedback from the non-statutory consultation, the Applicant took steps to improve access to the consultation by including more events over two weeks, including events programmed during evenings and a weekend event. Additional and more detailed consultation materials were included online and at events, for example, large site plans laid out on tables, a virtual viewpoint experience, a virtual fly through of the Proposed Development presented on a TV screen at events and an interactive 3D model demonstrated at events whereby consultees could explore the Proposed Development and visual impact from any location, including inside the site boundary. These additional materials were well received based on feedback from events. However, participants were less positive in feedback forms when asked about the clarity of consultation materials, being listened to by the Applicant, and the accessibility and inclusivity of the consultation.

4.2.3.6 Copies of the s47 notices and statutory consultation materials will be included with the Consultation Report as part of the application for Development Consent. The Consultation Report will also include a summary of the responses by theme including the Applicant's regard to feedback and whether it resulted in a change to the design.

4.2.4 RESPONSES RECEIVED UNDER S48

4.2.4.1 There was a total of five responses to the s48 Notices received via email and all requested a memory stick containing the consultation documents. All consultees received a copy of the consultation documents on a memory stick as requested, although they did not provide any further comments. No further responses were received under s48.

4.3 CONSIDERATION OF FEEDBACK

4.3.1.1 The Applicant recognises their duty to take account of responses to consultation and publicity, in accordance with s49 of the PA 2008. The Applicant is preparing a Consultation Report which will be submitted as part of the DCO application. The Consultation Report will demonstrate how consultation responses have been taken into account during the preparation of the application. At this time, the Applicant has considered feedback received on the consultation to inform design evolution of the Proposed Development, which is ongoing and will be reported in full in the Consultation Report. Those changes currently arising in response to this consideration include, but are not limited to:

- The layout of the Proposed Development has been refined to avoid impacts on existing tree cover. This will ensure tree cover provides a better barrier for visual and noise impacts.
- Opportunities for BNG were discussed with local residents and their ideas have been incorporated, where possible into the design.
- Opportunities to enhance road safety and impose temporary speed restrictions are being considered.
- Where dry ditches within the Wellhead and Leaching Area are proposed to be realigned, the use of culverts will be minimised and alternative options, such as clear span bridges will be utilised where possible.

- Surface water drainage outfall is now proposed to be via the proposed wet well, rather than via a drainage outfall into the East Newton Drain. This is proposed in order to better manage flooding risks at the site, and downstream.
- Lower noise fin fan coolers have now been proposed within the design of the Proposed Development, to reduce noise levels at nearby receptors.
- The open cut trench design for the Seawater Supply Pipeline, and the Brine Disposal Pipeline has reduced in width to limit the impact on the marine environment (more specifically the structure and function of less mobile sediments within the Holderness Inshore Marine Conservation Zone), in response to statutory consultation feedback from Natural England.
- A Temporary Sediment Sandbar Platform and Reception Pit ‘Safe Haven’ has now been included in the Proposed Development design following consultation with the Environment Agency, in order to minimise the risk of flooding during construction.

4.3.1.2 The Applicant is continuing its engagement with stakeholders and will consider how the scheme design may evolve in consideration of responses received.

4.4 FURTHER DESIGN CHANGES

4.4.1.1 The Guidance (Planning Act 2008: Pre-application stage for Nationally Significant Infrastructure Projects¹) sets out that:

“where a proposed application is amended in the light of responses to consultation then, unless those amendments materially and substantially change the proposed application or materially changes its effects as a whole, the amendments themselves should not trigger a need for further consultation.”

And further that: *“Only where the project taken as a whole changes very significantly, and to such a large degree that what is being taken forward is fundamentally different from what was previously consulted on, should re-consultation on the proposed application as a whole be considered.*

In understanding whether there has been a material and substantial change, applicants should take into account the following guiding factors:

- *the degree of change as compared to the proposals previously consulted upon as a whole;*
- *the number of materially worse environmental effects as compared to what has been the subject of previous consultations; and*
- *the level of public interest, and the likelihood that such interest would merit further consideration in the context of that change.”*

4.4.1.2 Ongoing reviews of the Proposed Development, government policy and feedback from previous phases of consultation, as well as progress in design, has resulted in some proposed changes to the Proposed Development. These are considered minor changes to the information shared during the statutory consultation period. These minor changes focus on safety enhancement within the facility. In light of the above quoted text from the Guidance, Table 4-1 below

sets out, at a high level, the amendments to the Proposed Development since statutory consultation was undertaken.

- 4.4.1.3 The Applicant is confident that the degree of change proposed does not amount to a very significant or fundamental change to the Proposed Development as a whole, and will not give rise to major additional significant effects compared to the assessments reported in the PEIR.
- 4.4.1.4 The Guidance goes on to state that:
- “For any material change to a part of the proposed application where the project as a whole is not fundamentally changed... a bespoke and targeted approach to further consultation can be adopted, which can address the specific consultation obligations arising proportionately.”*
- 4.4.1.5 The Applicant is proposing to undertake a proportionate approach to providing updates in light of the amendments to the Proposed Development. Public project update information sessions are currently planned for February 2026, with the aim of providing members of the local community with an overview of any updates made to the project design since the statutory consultation described above, as well as providing an overview of updated DCO submission timescales. The location of the session / sessions are yet to be confirmed.
- 4.4.1.6 It is considered that the public project update information session / sessions will be sufficient to update members of the local community of amendments to the design of Proposed Development since the statutory consultation.
- 4.4.1.7 Further, ongoing engagement with key statutory consultees has been, and continues to be undertaken by the Applicant in relation to any relevant design updates, as evidenced by the approaches outlined in Table 4-1 below, for changes relating to brine discharge rates and the cofferdam design.

TABLE 4-1 HIGH-LEVEL OVERVIEW OF AMENDMENTS TO THE PROPOSED DEVELOPMENT SINCE STATUTORY CONSULTATION

Design Development and Description	Rationale / Discussion
<p>Relocation of occupied buildings: All permanently occupied buildings (the control room, offices, workshops, and car parks) have been moved to a new separate area, outside the central processing area and near to the site entrance.</p>	<p>This change has been made to improve safety of the facility for those working there. Earth bunds and vegetation planting are proposed to help screen these structures. The implications of this relocation (for example, in terms of visual impact or noise) are being assessed as part of the ES and will be minimised where possible.</p>
<p>Compressor building modifications: The design of the building that houses the three compressors (used to compress hydrogen for storage) has been updated. The compressor buildings are now taller (up to 19 m) and could be partially enclosed.</p>	<p>This change has been made to improve safety of the facility, and as further progress on the construction methodology of the facility has been made. It allows cranes to lift equipment and results in a safer working environment.</p>
<p>Enclosed ground flare height increase and vent stack: A 'pressure relief and disposal system', which includes the enclosed ground flare and a vent stack, has been added to the Proposed Development. It is proposed to increase the height of the enclosed ground flare from up to 15 m to up to 25 m. The Proposed Development design now includes an emergency vent stack, which is a thin structure, up to 35 m tall and 50 cm wide.</p>	<p>This change has been made to enhance safety. The enclosed ground flare depressurises the system during planned maintenance through combustion of hydrogen. No flames or flares will be visible from the enclosed ground flare. The vent stack forms a 'relief system' which can rapidly depressurise the storage facility by releasing hydrogen to the atmosphere where it can safely dissipate in an emergency situation.</p>
<p>Pipeline installation: Two methodologies for installing pipelines are now being considered, including either: Horizontal directional drilling (HDD), which uses a small bore drill to drill through the soil, before pulling the pipelines through. If this method is chosen, construction will take place over two consecutive summer periods; or</p>	<p>The decision on methodology is subject to technical feasibility and will be decided at detailed design stage. Therefore, the reasonable worst-case scenario for both methods will be assessed in the ES to ensure all potential impacts are considered.</p>

Design Development and Description	Rationale / Discussion
<p>Direct pipe installation, which simultaneously excavates and installs a pipeline underground at the same time. Construction could take place over one or two consecutive summer periods.</p>	
<p>Brine discharge rates: The construction methodology for the solution mining of the caverns has been refined so that only four caverns will be solution mined at the same time, rather than five.</p>	<p>This will reduce the concentration of brine being discharged and has been proposed as part of further engagement with the Environment Agency.</p>
<p>Cofferdam design: The construction methodology has been refined in relation to the proposed cofferdam to include winged walls. In addition, it may be required that a cofferdam is constructed, used and de-constructed twice, over two years.</p>	<p>The refinement of the construction methodology in relation to the cofferdam has been proposed as part of further engagement with Natural England.</p>
<p>Traffic numbers: To support construction, it is now anticipated that slightly more Heavy Goods Vehicles (HGVs) will be required in the early months of the construction phase to support enabling works such as importing the required materials and on-site preparations. The numbers of HGVs are then expected to reduce following completion of enabling works.</p>	<p>The proposed construction traffic routes have not changed. A Construction Traffic Management Plan will be prepared as part of the DCO application for the Proposed Development.</p>

5. NEXT STEPS

- 5.1.1.1 The Applicant is committed to continued engagement with key stakeholders and the local community, in the lead up to, and following the submission of the application for development consent, as well as throughout the construction and operation of the Proposed Development, should a DCO be made by the SoS.
- 5.1.1.2 The Applicant will issue updates on the Proposed Development and the development consent application process via the project website as appropriate and Dalcour Maclaren will communicate with land interests accordingly.
- 5.1.1.3 Proposed Development public project update information sessions are currently planned for February 2026 as noted previously in Section 4.4.
- 5.1.1.4 The feedback from further consultation with regulators and members of the public will be incorporated into the Consultation Report and SoCGs. The Consultation Report will also provide further information of how the feedback received has informed the design of the Proposed Development.

6. REFERENCES

Nationally Significant Infrastructure Projects: 2024 Pre-application Prospectus. (Online) Available at: <https://www.gov.uk/guidance/nationally-significant-infrastructure-projects-2024-pre-application-prospectus> [Accessed December 2025].

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