

Department For Energy Security & Net Zero 3-8 Whitehall Place London SW1A 2AW FAO John Weadon

Question:

Dear Sir

Paragraph

Planning Act 2008 and The Infrastructure Planning (Examination Procedure) Rules 2010
Application by H2 Teesside Limited ("the Applicant") for an Order granting Development
Consent for the proposed H2Teesside development ("the Proposed Development") REQUEST
FOR INFORMATION

Please accept this email as NGT's response to the Information Request (EN070009) issued by the Secretary of State on  $7^{th}$  July 2025.

With reference to the paragraph numbering adopted within the Information Request, we provide the following response:

Response:

5	In its response to the first	Joint statement agreed with BP
	information request, the	Since 2024, NGT has met with H2Teesside to
	Applicant stated that the only	discuss the subject of blending and Project Union.
	credible route to connect into	This has involved the sharing of technical
	NGT's proposed regional	information to support decision-making with
	hydrogen network, part of	respect to the appropriate points of connection.
	Project Union, would be via the	
	connection points and above	Connecting at Billingham would require the
	ground installations on the	repurposing of an existing 24" NTS pipeline
	Cowpen Bewley Arm of the	between the Billingham Industrial Estate AGI and
	Proposed Development. The	Cowpen Bewley to allow for the hydrogen to
	Applicant stated this was	connect into the rest of the Project Union network
	because ongoing work with NGT	at Cowpen Bewley. However, the ability to do this
	showed that an alternative	without providing an alternative natural gas
	connection on the Billingham	supply to Billingham was a concern throughout
	Arm of the Proposed	the discussions with NGT, as it would need to
	Development is no longer	confirm this position with other stakeholders (and
	credible. The Applicant and NGT	this was part of the reason therefore for the
	should provide evidence of this	optionality within the DCO Application). Indeed,
	work and collaboration.	following the end of the Examination, it has now
		been confirmed that that existing pipeline is still
		at this time being used for natural gas supply,
		and to preserve this connection, an alternative
		natural gas supply would need to be provided.



As this was a known risk, discussions between the parties therefore focussed on the provision of a new natural gas pipeline to connect Billingham to the NTS to enable repurposing of the existing 24" NTS pipeline to hydrogen service. However, the work done to inform those discussions has identified that the construction of the pipeline and an associated AGI (to allow access for pigging for integrity management) cannot practically avoid the Teesmouth and Cleveland Coast SPA and SSSI. It would also involve the crossing of a number of existing buried services.

NGT should confirm the
Applicant's assessment that the
Cowpen Bewley Arm remains the
only connection available as
part of the Proposed
Development to connect into
Project Union. NGT should
provide information as to
whether the Proposed
Development being unable to
connect via the Cowpen Bewley
Arm would affect East Coast
Hydrogen.

NGT undertook an assessment of alternative routing options for connection to Project Union. The primary purpose of this assessment was to consider the feasibility of repurposing a section of the existing 24" natural gas pipeline from Cowpen Bewley to Billingham (Feeder 6). All of the routes, except for one, connected with bp's proposed routing at or close to plot 3/8 within the Order Limits EN070009-001805-H2T DCO 2.2 Land Plans Rev 3 - 6 Feb 25.pdf, which is downstream of the NGET parcel of land being discussed. The one scenario which did not connect at this location was a route that connected to Project Union at Billingham. Given Billingham is a natural gas offtake, a separate natural gas pipeline would need to be constructed to preserve this connection.

In the project outputs following the assessment, the routing option which connected via
Billingham scored less favourably to the new build pipeline direct to Cowpen Bewley, as proposed by the Applicant. This was for the reasons outlined in the joint statement above.

As part of Project Union: East Coast, NGT has engaged directly with customers and collected primary data regarding forecasted hydrogen supply and demand. A significant part of the forecasted demand is concentrated in the



	Humber region, where local forecasted hydrogen supply may be insufficient to allow unconstrained operation of large demand loads as required, for example, by power generation. Consequently, a pipeline connecting Teesside, the location of several planned hydrogen production projects, to the Humber is highly beneficial to meeting this demand. If H2Teesside cannot connect to Project Union this could result in a shortfall in hydrogen supply, preventing some customers from transitioning fully to hydrogen.
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