

Humber Carbon Capture Pipeline - EN0710003

Net Zero North Sea Storage Limited

Section 51 Advice Log

Version: 12 May 2025

There is a statutory duty under [section 51 \(s51\) of the Planning Act 2008](#) for the Planning Inspectorate to record the advice that it gives in relation to an application or potential application, and to make this publicly available.

This document comprises a record of the advice that has been provided by the Inspectorate to the applicant (Net Zero North Sea Storage Limited) and their consultants during the pre-application stage. It will be updated by the Inspectorate after every interaction with the applicant during which s51 has been provided. The applicant will always be given the opportunity to comment on the Inspectorate's draft record of advice before it is published.

The applicant will use this Advice Log as the basis for demonstrating regard to section 51 advice within the application.

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Date of advice	Meeting overview
31 October 2024	Review of programme document and feedback
14 November 2024	Project Update Meeting
12 May 2025	Project Update Meeting

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Topic	Review of programme document: 28 October 2024
General	The Programme Document should be published on the Applicant's website.
Timing of scoping request	The Inspectorate notes the proposed programme for scoping is Q4 2025. Please note that consultation bodies only have 28 days to respond to the Planning Inspectorate's consultation on the scoping report therefore the Applicant should consider the timings and the potential impact of holiday periods to affect consultation bodies capacity to respond, and the possible risks this may pose to the scoping process.
Project programme	The Applicant should ensure there is a sufficient gap between the receipt of the scoping opinion and the start of the statutory consultation, to ensure that consultation materials are sufficiently detailed/accurate.
Draft document review	There is no reference to the submission and review of draft documents in the current programme. Six weeks should be allowed for the Inspectorate to review the documents and provide feedback. The Applicant should consider the best time to provide draft documents in line with the Inspectorate's published pre-application guidance and provide advanced notice to the Inspectorate of its intention. There should be sufficient time after PINS feedback for the Applicant to address comments before the submission of the application.
Statement of Community Consultation (SoCC)	It would be helpful if the programme for preparation of the SoCC, consultation on the SoCC and consideration of any feedback, is separated.
Consultation and Adequacy of Consultation Milestone (AoCM)	The Applicant should consider whether the programme contains sufficient time to include a targeted consultation, after statutory consultation and ahead of the application submission, should this be required. The timing of the AoCM notification should also be re-considered should this take place.
Main issues	The Inspectorate acknowledges the Applicant's place holder for the main issues for resolution and how to address them. It would also be helpful to provide high level information about engagement with stakeholders on these topics. This should be updated following the close of the non-statutory consultation.

Project Update Meetings with the Inspectorate	It would be helpful to include timescales for when the Applicant considers these to be helpful/necessary.
Evidence Plan meetings	The Inspectorate requires 6 weeks' notice to participate in Evidence Plan meetings and potential dates for these should be included in the Programme Document.
Pre-application risks	The Inspectorate acknowledges the Applicant's place holder for pre-application risks. This should be updated following the close of the non-statutory consultation.
Engaging with Statutory Consultees and Local Planning Authorities (LPA's)	It would be helpful if this included details regarding any intended financial support agreements, such as Planning Performance Agreements (PPAs) and any risks to ongoing engagement. It would be helpful to include the views of LPA's when producing the AoCM.
Topic	Project Update Meeting: 14 November 2024
Project Update	The Inspectorate advised that the Applicant should consider Planning Performance Agreements (PPAs) with Local Authorities that address the whole process as it will be beneficial to address resourcing risks within the Local Authorities.
Non-statutory Consultation	<p>The Inspectorate highlighted the importance of starting conversations with Statutory Parties early regarding protective provisions as this can help to limit the time spent on this during examination.</p> <p>The Applicant may benefit from being aware of the Design Principles Advice Notes published on the National Infrastructure Planning website. Examining Authorities will be taking this into account during Examinations along with the National Policy Statements (NPS).</p> <p>The Inspectorate also confirmed that advice regarding linear projects is currently being drafted and is expected to be published to the National Infrastructure Planning website in early 2025. As there is no confirmed publication date, the Applicant may wish to monitor this. The Inspectorate explained that the document covers the types of things that have caused complications in recent examinations and what Examining Authorities will be looking for in Examinations moving forwards.</p>

	<p>The Applicant advised that their land agents are starting to communicate with the Crown Estate. The Inspectorate reiterated the importance of engaging and working towards agreements early to mitigate the risk going into Examination.</p>
<p>EIA Scoping Report</p>	<p>The Inspectorate advised that a review of the draft PEIR would not be possible, but a future pre-application meeting could be held to have a discussion regarding this point.</p> <p>The Inspectorate highlighted the importance of mirroring the wording used within a draft Schedule of Commitments and the Environmental Statement. Discrepancies between the documents can lead to confusion during reviews.</p> <p>The Inspectorate advised against submitting the Scoping Report in mid to late December due to limited engagement likely from Local Authorities and Parish Councils due to the Christmas holidays, resulting in limited resources. Legislation sets out the requirement to complete the review of the Scoping Report within 42 days of receipt, so it cannot be submitted early to be started at a later date.</p> <p>The Applicant is required to submit the GIS shape file at least 10 working days prior to the Scoping Report, to allow time for the consultation bodies to be identified. If the Scoping Report is submitted in January, then a longer period than 10 working days would be beneficial to accommodate limited resources within the Inspectorate, over the Christmas holidays.</p> <p>The Inspectorate advised that if the Applicant plans to use a file transfer website for the Scoping Report, that a trial is conducted prior to the submission, to ensure the Inspectorate can access files successfully.</p> <p>The Inspectorate requests that the Applicant confirms the name and address they would like to use as this will assist the Inspectorate when sending out consultation letters. Additionally, the Inspectorate requests that the Applicant checks for confidential information and flags this to the Inspectorate, also avoiding unredacted personal data such as signatures to limit required redactions. Finally, the Inspectorate requests that the Applicant includes the reg8 notification that they intend to submit an Environmental Statement.</p>

<p>Programme Document Update</p>	<p>The Inspectorate requested that the Applicant provides more specific dates, the closer it gets to key milestones as this will assist with resourcing.</p> <p>The Inspectorate advised the Applicant to clearly demonstrate how the mitigation hierarchy has been applied. This can help to minimise the amount of questions that are raised on this matter during the Examination.</p>
<p>Draft Documents</p>	<p>The Inspectorate advised that the more finalised draft documents are, the more substantive the advice provided to the Applicant can be.</p> <p>Further discussions regarding draft documents can be had at the next update meeting.</p>
<p>Future Meetings and Advice</p>	<p>The Inspectorate explained that the six pre-application meetings need to be consistent across projects and therefore longer meetings may not be possible.</p> <p>The Inspectorate advised that providing the meeting slides ahead of future update meetings could improve the efficiency of the meeting and ability to cover all agenda items within the hour.</p>
<p>Topic</p>	<p>Project Update Meeting: 12 May 2025</p>
<p>Update on Project Programme</p>	<p>The Inspectorate reminded the applicant of the requirement to submit the s46 notification to the Inspectorate on behalf of the Secretary of State either before or on the date on which the statutory consultation commences.</p> <p>The Inspectorate advised that when working with Ofgem, it is important to express the timeline that the applicant needs to adhere to, to ensure the consultation process and the consenting process timeframes are met. It is important to communicate when engagement is needed within the programme to ensure the programme can be maintained as much as possible.</p> <p>The Inspectorate encouraged the applicant to provide well progressed versions of documents for the draft documents review, to enable more meaningful comments from the Inspectorate. For example, if submitting a draft consultation report, the applicant should consider including examples to</p>

	<p>evidence how it will demonstrate regard to consultation responses, statutory advice and guidance.</p> <p>The applicant should ensure sufficient time between receiving the Inspectorate’s comments on the draft documents, before submitting the Adequacy of Consultation Milestone Report (AoCM). The applicant may also wish to review recent projects that have submitted AoCMs and the feedback that has been issued by the Inspectorate.</p> <p>The applicant should submit all draft document together for the 6-week review, rather than staggering the documents.</p> <p>The Inspectorate requested that the applicant attempt to narrow the programme dates down to a particular month, rather than quarters to assist other parties in organising their resourcing and to improve their ability to engage with the project. It also helps the Inspectorate record data more accurately.</p>
<p>Overview of SoCC and Update on Plans for Statutory Consultation</p>	<p>The Inspectorate encouraged the applicant to ensure as much engagement with Local Authorities possible and determine what they would find helpful at an early stage. This can then be included in the Statement of Community Consultation (SoCC). This includes what information the Authorities would consider would be helpful for the applicant to include in consultation.</p> <p>The applicant should provide as much information as possible during statutory consultation to assist with understanding the project, thus enabling parties to make meaningful contributions. The good design advice page explains how use of visual tools can assist in this matter.</p>
<p>Compulsory Acquisition and Protective Provisions Update</p>	<p>The Inspectorate highlighted the importance of progressing as many land agreements, and protective provisions, as possible ahead of the submission of the application. This could assist a smoother examination. Post Meeting Note: a new detailed Land Rights Tracker has been added to the pre-application prospectus and the Inspectorate encourages the applicant uses this and present it as an application document (Nationally Significant Infrastructure Projects: 2024 Pre-application Prospectus - GOV.UK).</p> <p>It would also be helpful if the applicant shared the Traffic Assessment with National Highways and the local highway authorities as early as possible ahead of the submission of the application to assist a smoother examination in due course.</p>

	<p>The Inspectorate also advised the applicant to clearly explain the project's relationship with the offshore elements, including relevant timescales.</p>
<p>Mitigation Hierarchy</p>	<p>The Inspectorate advised the applicant of the importance of clearly demonstrating how the mitigation hierarchy has been applied and that the approach has been agreed with the relevant statutory bodies.</p>