



Planning Inspectorate

Humber Carbon Capture Pipeline - EN0710003

Net Zero North Sea Storage Limited

Section 51 advice regarding draft application documents

Issued on 5 August 2026

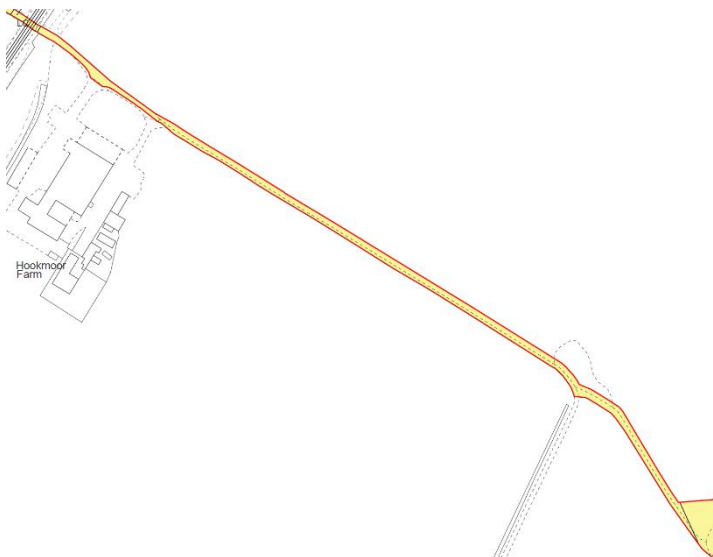
On 15 July 2026, Net Zero North Sea Storage Limited submitted the draft documents listed in the tables below for review by the Planning Inspectorate as part of its ['Pre-application Service'](#).

The advice recorded in the tables below relates solely to matters raised from the Planning Inspectorate's review of the draft application documents. The advice is limited by the maturity of the documentation provided by the applicant and the time available for consideration and is raised without prejudice to the acceptance decision, the decision about admission to the fast track procedure (where relevant) or the final decision about whether development consent should be granted. The applicant has been given the opportunity to comment on The Planning Inspectorate's draft record of advice before it was published.

General	
Ref No.	Comment or question
1.	As a general reminder, applicants need to comply with section 56(6) of the Planning Act 2008 and regulation 8 of The Infrastructure Planning (Applications: Prescribed Forms and Procedures) Regulations 2009 and provide the application and supporting documents in a format that can be published on the Find a National Infrastructure Project website. Application documents and data should be fully accessible and conform with The Public Sector Bodies (Websites and Mobile Applications) (No. 2) Accessibility Regulations 2018 and the Web Content Accessibility Guidelines (WCAG) 2.2 in relation to accessibility standards and the government's accessibility requirements. For example, alternative text should be included for figures within documents and the document title should be populated when documents are created to assist screen reader users (see the Planning Inspectorate's published Nationally Significant Infrastructure Projects: Advice on the Preparation and Submission of Application Documents - GOV.UK).

Draft sample works plans and land plans		
Ref No.	Plan Name and Ref	Comment or question
1.	Land Plan	It is generally difficult to understand which plot the reference numbers are denoting in some instances (as several of these reference numbers appear to be pointing to the boundary of the plot rather than the centre, which is causing some uncertainty). Some additional inserts (for example on page 3 with plot reference numbers 09-71 & 07-72) might help assist the general public in reading these plans.
2.	Land Plan	Page 1 - Plot ref 06-29 is showing in the insert, but missing from the main plan Page 2 – Plot ref 07-61 is missing.

Draft sample works plans and land plans

Ref No.	Plan Name and Ref	Comment or question
		Page 2 – Unlabelled plot. Potentially plot 07-50 as this plot ref is missing. 
3.	Land Plan	The placement of the north arrow appears in the legend rather than on the plan. Whilst this is compliant with the APFP regulations, the applicant should consider whether placement of the north arrow on the plan itself might assist with readability. Also inserts need own north arrow if of a different orientation.
4.	Land Plan	As the full Book of Reference was not provided, the Inspectorate was unable to verify the land plans against it. The applicant should ensure that the land plans and Book of Reference are reviewed together to confirm that all descriptions relating to the acquisition of rights, including their extent and location, are accurate, consistent and clearly presented. Where land references or markers are included within the description column of the Book of Reference, these should also be clearly shown and identifiable on the corresponding plans.

Draft sample works plans and land plans

Ref No.	Plan Name and Ref	Comment or question
5.	Land Plan	The main two categories of land included are '<i>Permanent Rights Acquisition</i>' and '<i>Temporary Rights Acquisition</i>'. Categories included in the Land Plan should reflect the categories and the powers sought (for example, permanent acquisition of land or freehold, permanent acquisition of right only, temporary possession only) in the draft Development Consent Order (dDCO). However, it could include any of the below (if applicable): • Order land - freehold to be compulsorily acquired and temporary use of land and in relation to which it is proposed to suspend or extinguish easements, servitudes and other private rights; • Order land - new rights to be compulsorily acquired (and restrictive covenants imposed) (and temporary use of land) in relation to which it is proposed to suspend or extinguish easements, servitudes and other private rights • Order land - temporary use of land and in relation to which it is proposed to temporarily suspend easements, servitudes and other private rights • Order land - Land not subject to compulsory acquisition or temporary possession.
6.	Land Plan	Boundaries of land can not be easily identified for certain clusters of sites and therefore the use of insets could be expanded (for example, Sheet 1 of 4, cluster of sites 06-42, 06-43, 06-19) as to aid legibility of the plan.
7.	Land Plan	Boundaries of all sites, as well as their identification, should be clear. The boundaries for sites 06-44, 06-13, 06-14, 06-11, 07-72, 09-71, 12-175, 12-170, 12-158, 12-151, 12-160 are hard to identify in relation to where the site starts and finishes.
8.	Works Plans	The Legend has 4 different keys for 'pipeline works'. The applicant should consider making the difference in these keys clearer or whether they should become one key.

Draft planning statement		
Ref No.	Paragraph/ Section	Comment or question
1.	1. Draft Planning Statement	Significant sections of the document are either missing or significantly incomplete, namely: sections 8, 9 and 10 and 11. Other sections, namely sections 6 and 7 are fairly incomplete in parts with some sub-headings more developed than others. Please note that this has limited the scope for comments and feedback to be provided on the planning statement document. Consequently, more specific comments could only be made on certain sections, while more general comments have been made on others with a view to assist content development and clarify expectations.
2.	2. Introduction	Changes brought forward on the 24 July 2026 to the Planning Act 2008 (PA2008) and the National Infrastructure Planning Guidance should be acknowledged and reflected within the introduction section of the Planning Statement. Although acknowledged that this issue is covered elsewhere in the document, the Planning Statement should also set out clearly how those changes have, or have not, affected the submission for acceptance (including what was or not submitted and any consultation that was carried out, if any).
3.	1.2.3	Update guidance included in this section as a result of the changes brought forward to the PA2008.
4.	5 Overview of the Proposed Development	This section could be expanded in order to provide further detail regarding the approach to alternatives (including location, layout, scale and (if applicable) technology) and the approach to site selection (including alternatives). It would also be encouraged to add information regarding how design has been taken into consideration as part of the development of the overall proposal as means to minimise potential effects.
5.	5 Overview of the Proposed Development	Although the applicant recognises that these specific sections are not complete, it is not clear what additional information the applicant intends to submit. We would suggest that section 5. 'Overview of the Proposed

Draft planning statement		
Ref No.	Paragraph/ Section	Comment or question
	and/or 6 The Context	Development' and section 6. 'The context' need to be made more robust by the inclusion of more granular information than what is included at present, namely: • 5.3 to 5.5 need to provide a better overview of the effects of the proposed development on each one of the identified sections including character of the area, highlighting any above ground proposed structures and providing more detail on the proposed works for each one of those sections • Section 5.6 will need to be substantially expanded including reasons for why the optionality is needed, details of what the different options are and an overview of the main effects associated with which one of the options still proposed and which of the options (if any) is the preferred one and why • Section 6.1 Environmental Context provides an overview of the main designations and constraints relevant to the context of the proposed development. However, it is recommended that more detail on each one of those constraints and designation are given, as to provide a clearer view of the applicant's assessment and how it relates to the planning appraisal.
6.	Tables	Suggested that the applicant includes a series of tables that set out, in a clear and easily understandable form, how the proposed development complies and responds to relevant national and local policies.

Draft design approach document (DAD)		
Ref No.	Paragraph/ Section	Comment or question
1.		The DAS document appears to be lacking figures illustrating the design iterative process that the applicant states it has worked through in order to define the taken approach. For example, section 3 'Design Process' where the applicant states that the "design process has been iterative, integrated and evidence-led". As such,

Draft design approach document (DAD)

Ref No.	Paragraph/ Section	Comment or question
		images showing the different iterations, how the visual aspects of those different interactions were considered and their visual impacts would be expected to be included.
2.	3.3.7	The document states that the applicant has coordinated the design process through regular design reviews. Images demonstrating and showing the key aspects considered through the design review process should be included, perhaps in an appendix to the document or list of figures.
3.	Table 6.1	Table 6.1 presents the summary of the consultation process as it relates to the design development. However, it would be beneficial, perhaps in an appendix, to show the main alternatives/design proposals considered and provide some sort of feedback on these and why the preferred or presented option was chosen.
4.	7 Evolution of the Design	This section refers back to Chapter 3 of the Environmental Statement (Consideration of Alternatives). However, a summary of the main alternatives and the design considerations that presided the assessment should be included.
5.	9 Securing Good Design	Information regarding how the DAD will be adapted as certainty in relation to the design of the proposed development evolves should be clearly included and set out in the DAD, alongside mechanisms for review after Consent is granted. While paragraph 9.2.6 refers back to the DCO and the main mechanisms for controlling post-consent design development, this should be set out here alongside an explanation of what the main aims are of those mechanisms and what it is expected to be achieved, alongside any measures of control and why those measures of control are appropriate.
6.	9 Securing Good Design	The applicant could consider adding information regarding the decommissioning stage and how this will be managed.

Issues Tracker		
Ref No.	Paragraph/ Section	Comment or question
		It is noted that the issues tracker is not an exhaustive list of potential issues, concentrating instead on headline issues yet to be agreed between the applicant and stakeholders and that further discussions will happen and will be captured in Statements of Common Ground (SoCGs) and the Consultation Report. It has been useful to have sight of this document, the level of content provided, and RAG rating applied to each topic at this stage, which is welcomed. While not every matter needs to be fully resolved before the submission of a DCO application (see the 'Planning Act 2008: Guidance on preparing an application part 1 - pre-application steps' at paragraph 3.4), as general guidance, it is advisable for applicants to have reached agreement with statutory consultees on the methodology to be used and the extent of surveys and data needed to appropriately assess any significant effects on designated sites and assets, protected species and habitats, and any other particularly sensitive receptors before the application is submitted, following the assessment of the need case, alternatives, and application of the mitigation hierarchy. This is to ensure the baseline information submitted with the application at the acceptance stage is sufficiently robust to meet the 'satisfactory test' and is capable of being examined within the statutory period. Topics where agreement has already been reached on such matters can be marked 'green', as well as any issues likely to play only a minor role in decision-making and where standard provisions can be relied upon (the applicant can decide to omit minor issues entirely from the issues tracker where appropriate).
2.		Where areas of disagreement are potentially to be resolved via the agreement of protective provisions in order to secure the protection of assets in relation to statutory undertakers, negotiations with those parties should be started at the earliest opportunity in relation to agreeing suitable protective provisions and refer to those in the status of issue update.
3.		Where the likelihood of resolution prior to submission is rated 'red', it may be worth expanding on those issues and potentially linking it with key chapters and key information of the Environmental Statement (ES) where this is relevant. For example: <i>issue 1.8 Concern around proximity of order limits/pipeline/AGIs/ temporary construction compounds/access roads to residential properties, including comments around safety</i> – it would

Issues Tracker		
Ref No.	Paragraph/ Section	Comment or question
		be worth including mention of any chapters in the ES where significant impacts have been identified (if any) or key chapters that include proposed mitigation or built-in measures (like design) to minimise impacts.
4.		If host local authorities have already flagged main areas and topics of concern for them, it may be useful to also include those in the Issues Tracker as to provide a clearer audit of the work that the applicant and the host local authorities have already done in relation to understanding, and potentially resolving, those concerns.
5.		Where issues can be addressed and resolved through the application of standards and conventions in made DCOs for other linear schemes and / or via good practice measures in relevant Control Documents (such as Construction Environmental Management Plans and Materials and Waste Management Plans), please state this.