Planning Inspectorate

Humber Carbon Capture Pipeline - EN0710003
Net Zero North Sea Storage Limited

Section 51 advice regarding second tranche of draft application documents

Issued on 5 November 2026

On 1 October 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 the pre-application service set out in its 'Pre-application Prospectus'.

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.	The attention of the applicant is drawn to the value of providing fully accessible documentation, which is in conformity with the Public Sector Bodies (Websites and Mobile Applications) (No. 2) Accessibility Regulations 2018, the Web Content Accessibility Guidelines (WCAG) 2.2 AA accessibility standard and government accessibility requirements. For example, alternative text should be included for figures included within documents and the document title field of documents should be populated to assist screen reader users.

Issues Tracker		
Ref No.	**Paragraph/Section**	**Comment or question**
1.		It is noted that the present document is not a complete and exhaustive list of potential issues, that it concentrates on headline issues yet to be agreed between the applicant and stakeholders and that further discussions will happen and will be captured in any Statements of Common Ground (SoCG) and a Consultation Report. As a general comment, the Issues Tracker should clearly denote the stage of discussions with relevant statutory parties against each topic and the applicant's progress made with agreeing the methodologies to be used and the scope of surveys and assessments needed before submitting the application, as well as the appropriateness of any mitigation measures proposed. Applicants should also be following current examination practice and standards in made Development Consent Orders, where applicable to the application. The Planning Inspectorate therefore assumes that issues not included in the Issues Tracker are either resolved or unlikely to be controversial / present risks. It has been useful for the Planning Inspectorate to have sight of this document at this stage and the RAG rating used.
2.		Where areas of disagreement have potential to be resolved via the agreement of protective provisions in order to secure the protection of assets in relation to Statutory Undertakers, the Planning Inspectorate

Issues Tracker		
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		recommends that negotiations are started at the earliest opportunity with those parties in relation to securing suitable protective provisions (especially any bespoke provisions) and mention those in the Status of issue update. Agreeing protective provisions can take up a considerable amount of examination time. The applicant should ensure to do everything possible to reach agreement before submitting the application, denoting the extent and progress made with agreeing draft protective provisions in its documentation, and be prepared to submit Statements of Common Ground should the application be accepted for examination. Any appointed Examining Authority is likely to request SoCGs early in the examination, or before the examination starts, by way of procedural decisions.
3.		Where likely 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 ES where this is relevant. For example: *issue 1.8 Concern around proximity of order limits/pipeline/AGIs/ temporary construction compounds/access roads to residential properties, including comments around safety* – the applicant should consider 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 matters.
5.	**1.2**	National Grid's North Humber to High Marnham (NHHM) proposal is now at the acceptance stage. The applicant should ensure that ongoing meetings continue during examination and after examination period at least until decision, in order to flag up any issues that could impact on the Order Land.

Issues Tracker		
Ref No.	**Paragraph/Section**	**Comment or question**
6.	**1.6**	The applicant is requested to note that attempt to engage and options other than CA should be detailed and justified on a case by case basis.
7.	**1.8**	The applicant states that […]*" in some locations technical and engineering constraints and other material considerations mean it has not been possible to accommodate all requests/concerns, which could lead third party representations at Examination"*. If there are other options to deliver pipeline that would not raise safety concerns either, justification on a case by case (i.e. plot by plot) basis needs to be included as well as options considered.
8.	**2.4.2**	It is recommended that this issue could be progressed further before acceptance as likely to impact other areas of the Hydrology Chapter.

Draft DCO		
Ref No.	**Article/ Schedule/ Requirement**	**Comment or question**
1.		The applicant is advised that the draft Development Consent Order does not contain a contents page. Whilst this is not a statutory requirement, the inclusion of a contents page would assist navigation of the document, particularly given its length and complexity. The applicant should consider including a contents page in the next iteration of the draft DCO to improve the usability and accessibility of the document for all parties.

Draft DCO		
Ref No.	**Article/ Schedule/ Requirement**	**Comment or question**
2.		The applicant should review the numbering and sequencing of Parts throughout the draft DCO and make any necessary corrections to ensure the document is clear, accurate and internally consistent. For example, part 4 (Interpretation) comes after part 5 (Powers Of Acquisition).
3.		There appear to be inconsistencies between the works described in the draft Development Consent Order and the Works Plans. The applicant should review the drafting to ensure that all works identified on the Works Plans are appropriately described and authorised within the draft Order. For example, work numbers 5b to 5e are not referenced within the DCO.
4.	**Schedule 11**	No Protective Provisions have been included within the current draft Order. The applicant should ensure that appropriate Protective Provisions are included as discussions with statutory undertakers and other affected parties progress, and that any associated approval, consent or agreement mechanisms are clearly identified within the draft DCO.
5.	**Schedule 2**	"Block valve" is defined in under 2. Interpretation. However, it only appears to then be referred to under "BVS" and it is not specified under Works; therefore it is questioned whether it is needed.
6.	**Schedule 2**	"Maintain" as defined in 2. Interpretation and Art.5 is quite broad and includes decommissioning. This seems to be at odds with recently made DCOs.
7.		Work No.2 refers to the 'Drax facilities'. The Inspectorate assumes this is referring to Work Nos. 1a and 1b, however recommends that this is defined, or replaced with a reference to the relevant work numbers.
8.	**Schedule 2**	The interpretation section of the dDCO refers to "BVS". This abbreviation is not used further in the dDCO therefore it is questioned whether it is needed.

Draft DCO		
Ref No.	**Article/ Schedule/ Requirement**	**Comment or question**
9.	**Article 24**	Removal of human remains does not appear to be clearly justified as no construction works are proposed to be carried out in areas where the applicant is likely to include human remains.
10.	**Article 29**	The Draft Planning Statement confirms that the draft Order Limits will not pass through any Mineral Safeguarding Sites. Consequently, clearer justification is needed for this policy.
11.	**Article 44**	Application and modification of legislative provisions (2) disapplies the Neighbourhood Planning Act 2017 provisions on temporary possession of land. These provisions were never brought to force and were removed under the Planning and Infrastructure Act 2025. Therefore, it is questioned whether it is needed.
12.		The applicant is recommended to include a requirement for pre-construction, construction, post-construction and operational environmental survey and monitoring data to be shared in the appropriate formats with the relevant Local Environmental Records Centre, and relevant national and regional environmental recording schemes (if the relevant LERC does not already share data with these).
13.	**Requirement 4**	Requirement 4 of the dDCO states that works numbers 1, 14, 21, 31 and 44 must be carried out in general accordance with the general arrangements plans. It is not clear why other works numbers are excluded from this requirement. The dDCO currently does not include a work no. 44, as the last specified work (Immingham Docks TCC) is work no. 42.
14.	**Schedule 2 Part 1 Requirement 5**	5(1) states '[...] following consultation of the Environment Agency'. This should be amended to state 'with' the Environment Agency. 5(1) should also include consultation with the statutory nature conservation body. The drafting should also require the CEMP to include details of management, monitoring, adaptive management, and reporting measures required for that stage.

Draft DCO		
Ref No.	**Article/ Schedule/ Requirement**	**Comment or question**
		Paragraph 2.9.129 of the ES project description states that a 'bentonite breakout plan' will be in place for HDD. However, it is not clear how this is secured within the dDCO. It is not listed in Schedule 2 Part 1 Requirement 5(2). This requirement should be amended to include reference to the 'bentonite breakout plan' as (n).
15.	**Schedule 2 Part 1 Requirement 12(1)**	12(1) should include consultation with the statutory nature conservation body. 12(1) states '12.—(1) 11 No development of Work Nos [...]'. '11' should be removed. The drafting should also require the LEMP to include details of management, monitoring, adaptive management, and reporting measures required for that stage.
16.	**Schedule 2 Part 1 Requirement 15**	Paragraph 2.9.192 of the ES project description states that an 'Operational Environmental Management Plan (OEMP)' will be developed by the applicant. However, Requirement 15 makes reference to an 'Operational Phase Mitigation Plan'. The ES does not make any reference to this plan. The ES and dDCO should be consistent; the Inspectorate recommends the use of OEMP in Requirement 15 as this is more widely understood and common.
17.	**Schedule 2 Part 1 Requirement 16(1)**	The Inspectorate recommends that 16(1) should also include consultation with the statutory nature conservation body. The drafting should also require the DEMP to include details of management, monitoring, adaptive management, and reporting measures required for that stage.
18.	**Schedule 2 Part 1 Requirement 19**	The Inspectorate recommends using 'Outline Biodiversity Gain Plan' rather than 'Biodiversity Net Gain Assessment' 19(1) should include provision for approval of the Biodiversity Gain Plan by the relevant discharging authority. This would be either the relevant planning authority (host local planning authority or a lead local planning authority where there are multiple hosts) or alternatively, the Secretary of State.

Draft DCO		
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		19(1) and 19(3) are inconsistent in terms of the staged/phased approach of the proposed development. This should be clarified. The applicant should ensure that Requirement 19 is drafted in line with the general requirements outlined in Paragraphs 9.6 and 9.7 of the Biodiversity Gain Statement for Energy (June 2026). Paragraph 9.7 of the Biodiversity Gain Statement for Energy (June 2026) states that: "If the applicant proposes to submit biodiversity gain plans for approval on a phased approach, this should be discussed with the Planning Inspectorate and the relevant discharging authority at the pre-application stage." The applicant should clarify in the dDCO and Outline Biodiversity Gain Plan the approach to the submission of biodiversity gain plans, and undertake proper pre-application engagement with the Planning Inspectorate and relevant discharging authority.

Draft Explanatory Memorandum		
Ref No.		**Comment or question**
1.		The applicant should review the schedule references within the Explanatory Memorandum to ensure they accurately reflect the draft DCO. Page 26 of the EM contains a list of the Order Schedules; however, Schedules 7 and 8 of the draft DCO are not included within that list despite forming part of the Order. In addition, Schedule 7 of the draft DCO, titled “Land in which only new rights etc. may be acquired”, appears to be incorrectly referenced in the EM as Schedule 9. The applicant should undertake a comprehensive review of

Draft Explanatory Memorandum		
Ref No.		**Comment or question**
		all schedule references to ensure they are complete, accurate and consistent between the EM and the draft DCO. Furthermore, Schedule 2A: Counter-Notice Requiring Purchase of Land is not currently identified within the EM. The applicant should ensure that all schedules contained within the draft DCO are appropriately listed and described within the Explanatory Memorandum, and that any cross-references are accurate throughout the document set.
2.		EM reference to Art. 24 Removal of human remains refers only to this being included as a precautionary measure with no clear link to the proposed development. EM needs to provide further information to justify its inclusion in the DCO.
3.		EM reference to Art. 29 Compulsory acquisition of land: minerals refers only to this being a model provision with no clear link to the proposed development which is also not easily identified by the land plans or the works plans. EM needs to provide further information to justify its inclusion in the DCO.
4.		EM reference to Art. 46 Application of landlord and tenant law refers only to this being a model provision with no clear link to the proposed development which is also not easily identified by the land plans or the works plans. Also, does not include in the EM any reference or consideration of compensation. EM needs to provide further information to justify its inclusion in the DCO.
5.		EM states that Art. 44(2) as it disapplies the Neighbourhood Planning Act 2017 provisions on temporary possession of land. These provisions were never brought to force and were removed under the Planning and Infrastructure Act 2025; therefore, further justification is needed for its inclusion.

Draft Environmental Statement Project Description		
Ref No.	**Paragraph/ Section**	**Comment or question**
1.	**Paragraph 2.1.6**	Paragraph 2.1.6 identifies licensable activities at the Easington landfall, River Humber crossing, River Trent crossing and Hedon Haven crossing. The Inspectorate understands from the project update meeting on 20 October 2026 that marine licensing exemptions would likely apply to the River Humber and River Trent crossings as there would be no works between mean high water springs and mean low water springs. For ease of understanding, the ES should reflect this position. The Hedon Haven crossing is not further referred to within the ES chapter. The ES should provide a description of the works required at this location. The term 'Hedon Haven crossing' also does not appear in Schedule 1: Authorised development of the dDCO. The Inspectorate considers it would be useful to include consistent terminology to facilitate understanding of the proposed development.
2.	**Paragraph 2.2.2**	The draft project description chapter states that each link of the overall CCS chain is independent. It may be beneficial to provide a description of how it is to be ensured that the proposed development has been designed to be compatible with potential future connections from emitters and to the offshore pipeline e.g. landfall location, pipe diameter and technical specifications.
3.	**Table 2-1**	Table 2-1 column 1 calls section 3 of the pipeline "East bank of the River Humber to MLWS". The accompanying description states that section 3 extends "from the River Humber's north bank to Easington". The description of the section should be consistent (and also with the description of section 2) to avoid misunderstandings.
4.	**Paragraph 2.3.12**	Paragraph 2.3.12 states that "The whole of the Order Limits has been assessed as being potentially impacted but only to the total relevant width as stated in Table 2-3". As the Order Limits and 'total relevant width' may be different along the route of the Proposed Development, this sentence appears to contradict itself. Clarity should be provided regarding the worst-case scenario and the area of the Order Limits that form the basis of the ES.

Draft Environmental Statement Project Description		
Ref No.	**Paragraph/ Section**	**Comment or question**
5.	**Table 2-3**	The use of pipeline section numbers within the table would enable easier understanding of the 'area' in question. It is unclear why n/a has been stated under the "Spur Pipeline (m)" column, when spur pipelines are referred to in the first "Area" column. This should be clarified.
6.	**Table 2-4**	It is unclear if the depths stated are below Above Ordnance Datum (AOD) or below the surface of the ground. It is understood from Article 6 of the dDCO to be the latter. This should be clarified within the ES. It is unclear if the 4m value stated in Table 2-4 represents the vertical limits of deviation (therefore there would be a maximum construction depth of 5.2m) or is the maximum construction depth. In contrast, table 2-5 provides the maximum depth below ground of permanent above ground structures. Clarity should be provided as to what the values in Table 2-4 represent.
7.	**Table 2-5**	Table 2-5 provides parameters for permanent above ground structures. Requirement 4 of the dDCO refers to Table 1 for parameters, however this table has not been included at this stage. The Inspectorate expects the parameters in the ES to be secured within the dDCO. Table 2-5 identifies "maximum depth below ground" for permanent above ground structures. However, this is contradicted by Article 6 of the dDCO which allows vertical deviation "downwards to any extent as may be found necessary or convenient". This should be explained within the ES alongside an explanation of how it has been taken into account in the assessment of effects.
8.	**Paragraph 2.4.2**	Paragraph 2.4.2 states the main pipeline would be approximately 66cm in diameter however the dDCO refers to 711mm pipelines. It also states that spur lines would be up to 31cm, however the dDCO refers to one 323.8mm pipeline. The dDCO also refers to 168.3mm and 219.1mm pipelines. Whilst the physical differences in measurements are very small, there should be consistency across documents.

Draft Environmental Statement Project Description		
Ref No.	**Paragraph/ Section**	**Comment or question**
9.	**Table 2-6**	Table 2-6 identifies two location options for the Drax AGI (Work No. 1A and 1B of the dDCO) and the Salt End AGI (Work No. 29A and 29B of the dDCO). It is unclear from the current drafting of the dDCO how construction would be restricted to just one option.
10.	**Paragraphs 2.4.3, 2.9.2 and 2.9.33**	These paragraphs note that the top of the pipeline would normally be at a minimum depth of 1.2m below the surface. Article 6 of the dDCO allows an exception where conditions make this impracticable, in which case the upwards limit is 0.7m. This should be explained in the ES.
11.	**Paragraph 2.6.2**	Section 2.5 defines three types of AGI: inlet, junction and block valve station AGIs, with section 2.6 treating the pump facility as a separate component. Table 2-2 likewise has separate rows for "AGI" and "Pump Facility". However, paragraph 2.6.2 states that "The Pump Facility is the last AGI before the pipeline traverses the Dimlington Cliffs […]" Work No. 40 of the dDCO refers to "an AGI at Easington Pump Facility". Clarity should be provided as to whether the pump facility is considered to be an AGI.
12.	**Paragraph 2.6.6**	Paragraph 2.6.2 proposes a "single-storey administration building and control room" within the pump facility, a "larger workshop" situated adjacent to or within the pump facility and a "welfare building" for permanent staff. Paragraph 2.10.17 states the pump facility is "designed as being not permanently attended". These descriptions do not align with one another; the ES should clarify what is meant by "permanent staff".
13.	**Paragraph 2.6.14**	Paragraph 2.6.14 states that "onsite diesel powered generation units would be in place within the pump facility but not used". The purpose of these units is therefore not clear.
14.	**Tables 2-7 and 2-10**	Tables 2-7 and 2-10 refer to interconnectors, which the Inspectorate assumes means the pipeline spurs. The Inspectorate recommends that consistent terminology is used throughout the ES.
15.	**Tables 2-7, 2-11 and 2-12**	The Inspectorate assumes that the traffic movements are one-way, however the Inspectorate recommends that this is clarified.

Draft Environmental Statement Project Description		
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16.	**Table 2-8**	Table 2-8 provides details of the temporary construction compounds (TCCs). For several of the TCCs, the table states that the TCC is "Sized to act as a Type 1, 2 or 4 compound". It is therefore unclear why they are assigned a single specific type in the third column. The Inspectorate considers that if there is flexibility as to the purpose of the TCC, this should be reflected in the third column.
17.	**Paragraph 2.9.6**	Paragraph 2.9.6 states that geotechnical surveys, archaeology work and contaminated land surveys are ongoing and will continue beyond the submission of the DCO. The application documents should confirm which surveys are incomplete or planned for a later date, the anticipated date that survey results will be available, the spatial coverage of any ongoing or remaining surveys, and how the application has considered any data gaps.
18.	**Paragraph 2.9.17**	In the absence of draft figures, the Inspectorate is unclear whether the search area for a TCC at Immingham Docks is within the draft Order Limits. If it is not, the ES should clarify, and if not within the draft Order Limits, explain how their consent would be sought.
19.	**Paragraph 2.9.22**	Paragraph 2.9.22 states that the TCCs are anticipated to be required for the full construction phase. Paragraph 2.4.1 states that section 3 of the pipeline is anticipated to become operational by 2032, three years ahead of sections 1 and 2 in 2035. The ES should explain why TCCs for section 3 are required for the full construction period.
20.	**Paragraph 2.9.24**	It is unclear if "tie-in points, AGI construction" are activities that could be undertaken out of hours, or simply during poor light conditions within the permitted working hours. If the former, it is unclear how these allow with the exceptions identified in dDCO Requirement 13(3). This should be clarified.
21.	**Paragraphs 2.9.45 to 2.9.83**	These paragraphs describe the following types of trenchless crossings: • auger bore • micro tunnel • direct pipe

Draft Environmental Statement Project Description		
Ref No.	**Paragraph/ Section**	**Comment or question**
		• horizontal directional drilling (HDD) • tunnel boring machine The interpretation section in the dDCO refers to trenchless installation techniques as “the installation of the pipeline works and/or associated electronic communications cabling by means of boring techniques including horizontal directional drilling, auger boring and micro-tunnelling”. The DML in Schedule 12 of the dDCO defines trenchless installation techniques as “the installation of the pipeline works and/or associated electronic communications cabling by means of boring techniques including horizontal directional drilling, direct pipe and micro-tunnelling”. Definitions of trenchless installation techniques should be consistent across all application documents.
22.	**Paragraphs 2.9.56 and 2.9.58**	These paragraphs helpfully detail the working area and duration of works for micro tunnel crossings, but equivalent information is not provided for all crossing types. The Inspectorate recommends that the: • working area and duration is identified for auger bore crossings and tunnelling of the River Humber • duration of works is identified for River Humber HDD working area is identified for direct pipe crossings
23.	**Paragraphs 2.9.59 to 2.9.64**	A figure depicting the direct pipe installation method could aid in understanding of the process.
24.	**Paragraph 2.9.98**	The ES confirms that “The potential scenario of switching from the HDD method to the TBM method has been accommodated within the assessments by assuming a longer construction duration for TBM effects which would cover this scenario.”

Draft Environmental Statement Project Description		
Ref No.	**Paragraph/ Section**	**Comment or question**
		The Inspectorate understands that this responds to previous section 51 advice. However, it is not entirely clear how the "longer construction duration" has been determined as the durations for TBM or HDD alone have not been provided. The ES should be transparent in the assumptions made. The Inspectorate recommends the duration of each scenario (HDD, TBM and HDD which transitions to TBM) are presented. The ES should also identify any substantive differences in impacts from the three scenarios to evidence why assessing on the basis of a longer construction duration of TBM is appropriate as the worst-case scenario. The applicant should ensure that any impacts that would occur from HDD but not from TBM alone are taken into account in such an assessment. An understanding of the temporary land take during construction for the two alternative crossing options will assist in understanding the implications of switching from HDD to TBM in terms of land take. Therefore, it would be useful for the size of the working areas for TBM to be explained in paragraph 2.9.77, akin to that detailed in paragraph 2.9.85 for HDD. Figures depicting land take and use for the two options would also be useful aids for understanding.
25.	**Paragraph 2.9.117**	Paragraph 2.9.117 states that the cofferdam would extend beyond MLWS. Paragraph 2.3.2 states that the Order Limits extend as far as MLWS and the Inspectorate understands from meetings with the applicant that the cofferdam would sit across both the onshore and offshore consents. The consenting strategy for this element should be explained within the ES.
26.	**Paragraph 2.9.119**	Paragraph 2.9.119 states that if installing a micro tunnel with cofferdam, the pipeline would be buried to a maximum of 10m below (A)OD. It is not clear how this is consistent with the permitted limits of deviation given in Table 2-4 which allow depth of up to 50m below ground level.
27.	**Table 2-10**	It would be helpful to identify the features to be crossed on a corresponding plan. The table is entitled "Schedule of trenchless crossings", however it also refers to open-cut techniques. This should be clarified.

Draft Environmental Statement Project Description		
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28.	**Paragraph 2.9.155**	It would be useful if figure 2.1 identifies which of the construction accesses would also be required for permanent access.
29.	**Insert 2-10**	Insert 2-10 refers solely to the River Humber tunnel boring machine (TBM) crossing, despite the project retaining HDD as the alternative methodology. The schedule should acknowledge the alternatives available.
30.	**Paragraph 2.9.187**	Paragraph 2.9.187 states that “A normal working schedule of 12 hours (07:00 to 19:00) Monday to Friday is expected, with a reduced four hour workday on Saturday”. dDCO Requirement 13 permits 0700 to 1330 on a Saturday which is 6.5 hours. The working hours should be consistent across documents or an explanation provided for this discrepancy.
31.	**Paragraph 2.9.191**	It would be useful for the description of the Outline Construction Environmental Management Plan (CEMP) to include specific management plans, as per those listed in Requirement 5 of the dDCO. There is only one reference to the Register of Environmental Actions and Commitments (REAC) document within the dDCO. The Inspectorate therefore assumes it is proposed simply to bring all mitigation measures into a single signposting document. It would be useful for the purpose of the REAC to be explained within the ES.
32.	**Paragraph 2.10.10**	Paragraph 2.10.10 refers to the requirement for planned or emergency venting of the pipeline. The Inspectorate recommends that the anticipated emissions from this process are provided within the ES.