



Planning Inspectorate
Arolygiaeth Gynllunio

SCOPING OPINION:

Proposed Humber Hydrogen Pipeline

Case Reference: EN0710006

Adopted by the Planning Inspectorate (on behalf of the Secretary of State)
pursuant to Regulation 10 of The Infrastructure Planning (Environmental
Impact Assessment) Regulations 2017

01 July 2026

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1. INTRODUCTION

- 1.0.1 On 21 May 2026, the Planning Inspectorate (the Inspectorate) received an application for a Scoping Opinion from Humber Hydrogen Transmission System Ltd (the applicant) under regulation 10 of The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) for the proposed Humber Hydrogen Pipeline (the proposed development). The applicant notified the Secretary of State (SoS) under regulation 8(1)(b) of those regulations that they propose to provide an Environmental Statement (ES) in respect of the proposed development and by virtue of regulation 6(2)(a), the proposed development is 'EIA development'.
- 1.0.2 The applicant provided the necessary information to inform a request under EIA regulation 10(3) in the form of a Scoping Report, available from:

<https://national-infrastructure-consenting.planninginspectorate.gov.uk/projects/EN0710006>
- 1.0.3 This document is the Scoping Opinion (the Opinion) adopted by the Inspectorate on behalf of the SoS. This Opinion is made on the basis of the information provided in the Scoping Report, reflecting the proposed development as currently described by the applicant. This Opinion should be read in conjunction with the applicant's Scoping Report.
- 1.0.4 The Inspectorate has set out in the following sections of this Opinion where it has / has not agreed to scope out certain aspects / matters on the basis of the information provided as part of the Scoping Report. The Inspectorate is content that the receipt of this Scoping Opinion should not prevent the applicant from subsequently agreeing with the relevant consultation bodies to scope such aspects / matters out of the ES, where further evidence has been provided to justify this approach. However, in order to demonstrate that the aspects / matters have been appropriately addressed, the ES should explain the reasoning for scoping them out and justify the approach taken.
- 1.0.5 Before adopting this Opinion, the Inspectorate has consulted the 'consultation bodies' listed in appendix 1 in accordance with EIA regulation 10(6). A list of those consultation bodies who replied within the statutory timeframe (along with copies of their comments) is provided in appendix 2. These comments have been taken into account in the preparation of this Opinion.
- 1.0.6 The Inspectorate has published a series of advice pages, including '[Advice Note 7: Environmental Impact Assessment: Preliminary Environmental Information, Screening and Scoping \(AN7\)](#)'. AN7 and its annexes provide guidance on EIA processes during the pre-application stages and advice to support applicants in the preparation of their ES.
- 1.0.7 Applicants should have particular regard to the standing advice in AN7, alongside other advice notes on the Planning Act 2008 (PA2008) process, available from:

['Nationally Significant Infrastructure Projects: Advice pages'](#)

- 1.0.8 This Opinion should not be construed as implying that the Inspectorate agrees with the information or comments provided by the applicant in their request for an opinion from the Inspectorate. In particular, comments from the Inspectorate in this Opinion are without prejudice to any later decisions taken (e.g. on formal submission of the application) that any development identified by the applicant is necessarily to be treated as part of a Nationally Significant Infrastructure Project (NSIP) or associated development or development that does not require development consent.

2. OVERARCHING COMMENTS

2.1 Description of the Proposed Development

ID	Ref	Description	Inspectorate's comments
21.1	Tables 1-1 and 1-2	Planning history	The Inspectorate recommends the ES includes a figure depicting the locations of the identified planning applications to assist in understanding the spatial context of the proposed development.
212	Paragraphs 2.1.1.3 to 2.1.1.4 and 5.8.1.4	Flexibility	The Inspectorate acknowledges the proposed 'Design Envelope' has been designed to include sufficient flexibility to accommodate further refinement of the design. The Scoping Report refers to a 'realistic' Maximum Design Scenario (MDS) and 'reasonable variations in the form of the Proposed Development'. For the avoidance of doubt, the ES should establish those parameters likely to result in the maximum adverse effect (the worst case scenario), taking into account any limits of deviation (LoD). The assessments within the ES should be undertaken accordingly to determine significance of effect.
213	Section 2.3	Temporary land	All temporary land take should be clearly identified in figures within the ES. This should include, inter-alia, the pipeline working width, access tracks, construction compounds and pipe yard facilities.
214	Paragraph 2.4.2.6	Trenchless crossing techniques	The location of trenchless crossings should be identified on a figure within the ES. Should trenchless crossing techniques be relied upon to avoid or minimise impacts on sensitive receptors, the draft Development Consent Order (dDCO) should secure their use in relevant locations.
215	Paragraph 2.4.2.12	Landscaping	The ES should identify all proposed landscaping and confirm whether any is relied upon to mitigate potentially significant landscape and/or visual effects.

ID	Ref	Description	Inspectorate's comments
			The applicant should seek to agree the location and types of planting with relevant consultation bodies. The ES should explain and justify the assumptions made in respect of the growth rates and management of the planting proposed to mitigate effects.
21.6	Paragraph 2.4.2.13	Vent stack	It is unclear why the hydrogen venting stack at the Above Ground Installation (AGIs) would be a 'temporary installation'. The Inspectorate assumes venting would be required throughout the operational phase, and as such a permanent stack would be required. The ES should provide clarity on this matter and confirm the dimensions of the venting stack(s) required at each AGI.
21.7	Section 2.4.2	Permanent structures	The ES should detail the spatial footprint and heights of all permanent above ground structures, including the AGIs equipment, tie-in facilities, pigging facilities, block valves. Heights of all perimeter fencing and lighting columns should also be detailed.
21.8	Section 2.4.3	Humber crossing	The Scoping Report notes that the feasibility of both tunnelling and horizontal directional drilling (HDD) is currently being explored, with the 'feasible techniques' being assessed in the ES. Should the dDCO allow both options to take place (for example, if tunnelling is to be a backup option if HDD fails), the ES should assess the potential environmental effects of both of these design options taking place sequentially (as opposed to assessing the worst case scenario of just one option). The anticipated construction period of the Humber crossing should be clearly explained and justified in the ES.
21.9			The Scoping Report refers to the reinstatement of the majority of land temporarily used for trenchless crossings. Any land retained (temporarily or permanent) post-reinstatement should be identified in the ES. The ES should provide an equivalent explanation of reinstatement works required for tunnelling.
21.10	Paragraph 2.5.1.2	Construction programme	It is unclear whether construction of the Humber crossing is anticipated to take 36 months in total or 12 months (and would be constructed after the 24 month construction of the hydrogen pipeline and AGI). The ES should provide a clear anticipated construction timeline for each section of the proposed development, making it clear where concurrent construction could take place at different locations. The ES should clarify whether

ID	Ref	Description	Inspectorate's comments
			concurrent construction has the potential to affect specific receptors and undertake the assessment accordingly.
21.11	Paragraph 2.5.1.3 and CO17 of Appendix A	Construction work hours	It is unclear what is meant by the maintenance period detailed in bullet point four of paragraph 2.5.1.3. This should be explained in the ES.
21.12	Paragraph 2.5.1.5	24-hour working	The Scoping Report notes that tunnelling or boring under the Humber would require 24-hour working but states that these would be 'temporary in nature'. The ES should provide clarity as to what is considered 'temporary' and the applicant should ensure that the potential impacts of these works are not down-played.
21.13	Paragraph 2.5.2.7	Vegetation removal	The ES should identify all temporary and permanent woodland, hedgerow and tree removal required.
21.14	Paragraphs 2.5.2.38 and 2.5.3.3	Imported fill and surplus material	Imported fill and surplus material would result in vehicle movements with implications for the assessments of air quality, noise and vibration, and traffic and transport. The Inspectorate acknowledges that it will not be known in advance if excavated material is suitable for backfill and what the quantities of surplus material would be prior to the application being made. The assumptions made for such vehicle movements should be identified within the ES or a supporting Transport Assessment.
21.15	Paragraphs 2.2.2.11, 2.5.2.40 to 2.5.2.43 and 2.5.2.69	Water supply and disposal	The ES should confirm the anticipated water demand and water source(s) for construction and operational phases. It should demonstrate that the supply of water to the proposed development is deliverable and sustainable. Should water be supplied via tanker, these vehicle movements should be taken into account in the traffic and transport assessment and relevant air quality and noise and vibration assessments. The ES should also detail how construction and operational phase wastewater, including foul drainage, would be disposed of.

ID	Ref	Description	Inspectorate's comments
21.16	Paragraph 2.6.1.1	Maintenance and monitoring	The ES should provide an indicative schedule for scheduled preventative maintenance activities and aerial monitoring surveys during the operational phase. Whilst it is understood that corrective maintenance cannot be predicted, the ES should provide details of anticipated corrective maintenance activities, including the likely frequency, duration, and equipment required and traffic movements, based on experience from similar projects. Should corrective or preventative maintenance activities be anticipated to be of a similar scale to construction phase activities, the ES should include an assessment of likely significant effects. Avoidance and mitigation measures akin to those proposed for the construction phase should be committed to.
21.17	Section 2.8	Questions for consultees	The Inspectorate recommends the project description chapter within the ES identifies the anticipated vehicle movements (including abnormal indivisible loads), and anticipated employment generation (in the context of the workforce availability in the area at a time) for all phases of the proposed development. This will inform an understanding of the proposed development without the need for cross referencing to relevant aspect chapters.
21.18	Section 4.2	Alternatives	The Scoping Report provides a brief overview of the constraints considered in determining the route options, with a focus on engineering and operational factors. The ES should provide greater detail on any environmental constraints taken into account in the selection.

2.2 EIA Methodology and Scope of Assessment

ID	Ref	Description	Inspectorate's comments
221	Section 3.1.8	Biodiversity net gain (BNG)	The assessment of BNG reported within the ES should be based on an appropriate metric that allows clear understanding of how gains and losses have been calculated. The ES should clearly distinguish between mitigation for significant adverse effects on biodiversity from wider enhancement measures.
222	Figures 6-8 and 6-16	Figures identifying sensitive receptors	It is not possible to identify specific receptors on several figures, including figures 6-8 and 6-16. Any equivalent figures presented within the ES should identify the relevant receptors, for example through the use of a gazetteer.
223	Paragraph 5.4.1.4 and in each aspect chapter	Decommissioning	The Inspectorate considers there is the potential for significant effects during the decommissioning phase. However, it considers the applicant's assumption that effects would be less than the construction phase to be reasonable. It notes that an Outline Decommissioning Plan would be submitted with the DCO application and that a Decommissioning Plan would be developed at the time of decommissioning. The Inspectorate is generally content that a separate assessment of decommissioning is not required, with specific exceptions noted at IDs 3.1.4, 3.11.1 and 3.13.6 of this Opinion. The applicant should also ensure that the decommissioning phase is not overlooked in the ES. In order to evidence the assumption of effects being lesser than construction, the ES should provide a description of the likely decommissioning activities and the avoidance and mitigate measures to be employed. The ES should include the anticipated vehicle movements as well as estimates of the type and quantity of waste at the point of decommissioning and address the likely significant effects from waste at decommissioning to the extent possible at this time, including consideration of any measures to ensure that component waste will avoid entering the waste chain.

ID	Ref	Description	Inspectorate's comments
224	Section 5.4.2	Mitigation hierarchy	The ES should clearly describe the details of any necessary avoidance and mitigation measures to be implemented, along with monitoring, reporting, and adaptive management processes. These should be agreed, where possible, with relevant stakeholders and the ES should explain how they would be secured through the dDCO.
225	Section 5.10.1	Indirect effects	The Inspectorate considers that the likely significant effects of “other linked development which are connected with the Proposed Development, but not part of the Proposed Development” should be assessed in their own ESs. It does not consider there to be a need for the proposed separate indirect effects assessment to be presented within the ES for the proposed development, provided a robust cumulative effects assessment is undertaken.
226	Tables 6-10, 6-15, 6-20, 6-34, 6-40 and 6-66	Likely effects tables	Several of the likely effects tables identify the likely significance of effect of matters as ‘not significant’, however subsequently scope the matter in. For the avoidance of doubt, the Inspectorate agrees these matters should remain scoped in and expects an assessment of effects to be presented within the ES.
227	Section 8.3	Consultation	The ES should detail consultation undertaken with relevant consultation bodies for each aspect chapter and set out how consultation has influenced the scope and assessment methodology.
228	Appendix 1	Mitigation and monitoring	The Inspectorate welcomes the draft Commitments Register provided in appendix 1 of the Scoping Report. Relevant commitment numbers should be included in the text of ES for ease of reference. The current Commitments Register refers to several plans and strategies which would include design or mitigation measures. If the ES relies upon certain measures to avoid or minimise impacts on sensitive receptors, then outline versions of the relevant documents should be provided with the application. Appendix B of the Environment Agency’s consultation response (see appendix 2 of this Opinion) provides suggestions to the applicant for measures that could be implemented

ID	Ref	Description	Inspectorate's comments
			for the proposed development. The Inspectorate recommends the applicant consider these for inclusion in the Commitments Register.
229	n/a	Residues and emissions	The ES should provide an estimate, by type and quantity, of anticipated residues and emissions resulting from construction and operation of the proposed development, as required by Schedule 4(1)(d) of the EIA Regulations 2017.
2210	n/a	Transboundary	The Inspectorate on behalf of the SoS has considered the proposed development and concludes that the proposed development is unlikely to have a significant effect either alone or cumulatively on the environment in a European Economic Area State. In reaching this conclusion the Inspectorate has identified and considered the proposed development's likely impacts including consideration of potential pathways and the extent, magnitude, probability, duration, frequency and reversibility of the impacts. The Inspectorate considers that the likelihood of transboundary effects resulting from the proposed development is so low that it does not warrant the issue of a detailed transboundary screening. However, this position will remain under review and will have regard to any new or materially different information coming to light which may alter that decision. Note: The SoS' duty under regulation 32 of the 2017 EIA Regulations continues throughout the application process. The Inspectorate's screening of transboundary issues is based on the relevant considerations specified in the annex to its Advice Page 'Nationally Significant Infrastructure Projects: Advice on Transboundary Impacts and Process', a link for which can be found in paragraph 1.0.7 above.

3. ENVIRONMENTAL ASPECT COMMENTS

3.1 Geology and Ground Conditions

(Scoping Report Section 6.3)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.1.1	Table 6-3	Temporary loss of Best Most Versatile (BMV) agricultural soils (GEO-A)	The Inspectorate agrees that the temporary loss of BMV agricultural soils is unlikely to be significant subject to soil management measures and implementation of a Materials Management Plan (MMP) (CO4, CO6 and CO7 of Appendix A, Draft Commitments Register). It notes that permanent loss of BMV soils will be scoped in. Temporary losses can be scoped out of the ES.
3.1.2	Table 6-3 and section 6.3.7	Changes to soil function (compaction and drainage in areas subject to vehicle and heavy plant movement) (GEO-B)	Table 6-3 states that permanent changes to soil function would be limited to locations of permanent above ground infrastructure and considers the impact magnitude to be negligible. Section 2.4 states that seven AGIs are envisaged (ranging in size between 0.5ha and 2ha), three block valve sites (up to approximately 1ha) have been identified to date but the final number is to be determined. This could result in the irreversible loss of soil function over an area of 5 to 20ha, and could therefore be considered a medium impact magnitude according to table 6-5 of the Scoping Report. Considering the high sensitivity assigned to the receptor, table 6-6 identifies the potential for a moderate adverse significant effect. The Inspectorate does not therefore agree that changes to soil function at the locations of permanent above ground infrastructure can be scoped out. The ES should assess the potential effects of changes to soil function from these permanent structures. The Inspectorate agrees that changes to soil function along the pipeline route are unlikely to be significant subject to soil storage and reinstatement in accordance with DEFRA's Construction Code of Practice for the Sustainable Use of Soils on Construction Sites

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			PB13298 (CO5 and CO6 of Appendix A, Draft Commitments Register). Changes to soil function along the pipeline route can be scoped out of the ES.
3.13	Table 6-3 and section 6.3.7	Exposure to the workforce health impacts during construction (GEO-H)	The Inspectorate agrees that effects to workforce from the exposure to unexpected or unknown sources of contamination are unlikely to be significant subject to the use of appropriate personal protection equipment (PPE) (CO7 of Appendix A, draft Commitments Register). This matter can be scoped out of the ES. However, the Inspectorate recommends that CO7 of Appendix A, draft Commitments Register is expanded upon to detail the relevant good work practices and available guidance relied upon.
3.14	Table 6-3 and section 6.3.7	Accidental spills / leaks from use of plant / equipment with polluting potential during construction and operation (GEO-I)	Prevention and containment measures are proposed to be included within the Code of Construction Practice and standard operating procedures. However, the Inspectorate has considered the Environment Agency's response in appendix 2 of this Opinion, which advises that ground conditions present may not be standard. It raises concerns of pollution of sensitive groundwater receptors that underlie the majority of the proposed development. The Inspectorate also notes that scoping out GEO-I is inconsistent with scoping in WAT-A (surface water pollution). In the absence of further detail on the activities to be undertaken and detail of the measures to be employed, the Inspectorate does not agree that this matter can be scoped out at this stage. The ES should include an assessment of effects for all phases of the proposed development, including grouting during decommissioning.

ID	Ref	Description	Inspectorate's comments
3.15	Paragraph 6.3.3.3	Study area – hydrogeology	With regards to effects on groundwater, Natural England's consultation response (see appendix 2 of this Opinion) has noted complex interactions between superficial separated groundwater bodies, groundwater, and inputs of freshwater, brackish water and sea water

ID	Ref	Description	Inspectorate's comments
			under the land separating the Humber Estuary from the open sea. Natural England has advised that the study area (500m from pipeline) on the surface does not necessarily reflect the potential impacts of the structures on water bodies below ground. The Environment Agency similarly considers the study area to be insufficient. The Inspectorate recommends that the applicant should reconsider the study area for the assessment of effects on groundwater, and recommends the applicant seeks to agree this study area with relevant consultation bodies.
3.1.6	Paragraph 6.3.3.17	Artesian groundwater	Paragraph 6.3.3.17 refers to WFD groundwater bodies underlying the site. The applicant's attention is drawn to the comments of the Environment Agency (see appendix 2 of this opinion) regarding the need to consider artesian groundwater. The ES should assess impacts from water resource loss through artesian conditions encountered which require dewatering, where significant effects are likely.
3.1.7	Paragraph 6.3.3.8	Agricultural land	The ES should contain a clear tabulation of the areas of land in each BMV classification to be temporarily or permanently lost as a result of the proposed development, with reference to accompanying map(s) depicting the grades. Specific justification for the use of the land by grade should be provided. Efforts should be made to avoid and minimise temporary and permanent loss of BMV land as much as possible. Consideration should also be given to the use of BMV land in the applicant's discussion of alternatives.
3.1.8	Paragraph 6.3.3.21 and figure 6-1	Landfills	The applicant's attention is drawn to the comments of the Environment Agency (see appendix 2 of this opinion) regarding additional historic landfills. It also notes that the proposed development incorporates the full boundary of the permitted Stepney Lane landfill. This receptor should be identified within the ES as a possible source of contamination. It is unclear whether the proposed development would interact with the landfill; this should be confirmed within the ES. The ES should provide an assessment of the risks to controlled waters from interaction with this, or any other permitted or historic landfill,

ID	Ref	Description	Inspectorate's comments
			where significant effects are likely. Avoidance and mitigation measures to minimise risk to groundwater quality should be identified and secured.
3.1.9			The key to figure 6-1 identifies historic landfills. The Inspectorate recommends that equivalent figures within the ES identify authorised operating landfills.
3.1.10	Table 6-3	Receptor sensitivity	Paragraph 6.3.3.14 identifies Dimlington Cliff Site of Special Scientific Interest (SSSI), as being located within the eastern tip of the study area. Designated geological sites have been assigned a sensitivity of medium in table 6-3. Although designated sites are not included within table 6-4 (receptor sensitivity), the Inspectorate considers that a national designation should be assessed as high sensitivity, or justification provided as to why this is not the case.
3.1.11			Receptor sensitivities for groundwater abstractions are provided within table 6-11 of the Water Resources and Flood Risk chapter of the Scoping Report. These should also be identified within the Geology and Ground Conditions chapter of the ES.
3.1.12			Consideration should be given to expanding the number of sensitivity categories to avoid a single category change resulting in a multiple-category significance change. The applicant's attention is drawn to the comments of the Environment Agency (see appendix 2 of this Opinion) in this regard.
3.1.13	Table 6-3	Dewatering (GEO-E)	Table 6-3 does not identify specific receptors for this activity. The assessment should include consideration of effects on designated and potential Groundwater Dependent Terrestrial Ecosystems (GWDTEs). Sensitivity categories for GWDTEs should be provided within the ES.
3.1.14	n/a	Thermal emissions to sensitive groundwater receptors, including abstractions and	The Environment Agency has advised the ES considers the implications of thermal emissions from the buried pipeline in relation to risks to groundwater (see appendix 2 of this Opinion). The Inspectorate acknowledges that such an assessment is an emerging field and that there is currently no guidance relating to the potential thermal implications of buried pressurised gas transportation pipelines. The Environment Agency has advised

ID	Ref	Description	Inspectorate's comments
		Groundwater Dependent Terrestrial Ecosystems	the applicant follows its guidance for ground source heating and cooling systems to undertake a desk-based assessment. The results of the desk-based assessment should be presented in the ES. Where significant effects are likely, a feasible assessment based on the best available guidance at the time and agreed in consultation with the Environment Agency, should be undertaken.
3.1.15	n/a	Water quality impact during trenchless pipeline laying due to construction chemical leakages, such as bentonite breakout	This matter has been scoped in for surface water quality (WAT-C), however it is not considered for groundwater bodies. The Inspectorate considers this matter should be assessed within the ES, where significant effects are likely.

3.2 Water Resources and Flood Risk

(Scoping Report Section 6.4)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
321	Table 6-10 and section 6.4.7	Operational phase flood risk for buried infrastructure (WAT-E)	The Inspectorate agrees that operational phase impacts on-site and third-party flood risk from the buried infrastructure can be scoped out of the ES, provided it can be confirmed that there would be no permanent change to ground levels, permeability or drainage characteristics.

ID	Ref	Description	Inspectorate's comments
322	Table 6-10	Water quality impacts	The Scoping Report refers to both 'water pollution' (WAT-A) and 'water quality' (WAT-C). The Inspectorate assumes this terminology has been used interchangeably. For the avoidance of doubt, the assessment of construction phase water quality impacts should not be constrained to just those from trenchless installation techniques and should include likely significant effects from all activities, as advised by the Environment Agency (see appendix 2 of this Opinion).
323			Water quality impacts from construction site discharges have not been addressed. The ES should assess the potential impacts of discharges from construction site drainage, where significant effects are likely, and identify appropriate avoidance and mitigation measures to protect surface water quality.
324	Section 6.4.4 and table 6-10	Flood risk	The Flood Risk Assessment to be undertaken for the proposed development should be used to inform the assessment of likely significant effects from flooding on-site and off-site (both upstream and downstream).

ID	Ref	Description	Inspectorate's comments
			The Scoping Report has not identified specific third-party assets to be included in the assessment of flood risk. The ES should consider the potential for increases to, inter-alia: residential, community and commercial property; utilities infrastructure; transport infrastructure; existing flood management systems; and downstream receptors.
325	Paragraph 6.4.3.38	Nitrate vulnerable zones (NVZs)	Paragraph 6.4.3.38 identifies NVZs as a key receptor for consideration in the assessment, however no further reference is made to them within the Scoping Report. Any NVZs within the study area should be identified within the ES, and an assessment of effects on them undertaken, where significant effects are likely.

3.3 Air Quality

(Scoping Report Section 6.5)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
33.1	Table 6-15 and paragraphs 6.5.7.2 and 6.5.8.6	Road traffic emissions – operation (AQ-D)	The Scoping Report proposes to scope out this matter on the basis that the proposed development would be predominantly unmanned during operation and unlikely to give rise to significant effects on air quality. The ES should confirm the vehicle types and likely number and routing of vehicle movements required for operation of the proposed development. Provided these do not exceed the relevant screening criteria set out in the Institute of Air Quality Management (IAQM) guidelines, the Inspectorate agrees that significant effects on air quality are not likely and that this matter can be scoped out of the ES. If such confirmation is not possible, an assessment should be provided. The Inspectorate directs the applicant's attention to ID 2.1.16 of this Opinion in relation to the assessment of effects from maintenance activities.

ID	Ref	Description	Inspectorate's comments
33.2	Table 6-15, paragraphs 6.5.3.3, 6.5.35, and 6.5.4.2 to 6.5.4.5	Ecological receptors	The Air Quality chapter acknowledges that ecological receptors may be impacted by emissions from the proposed development and refers to the Ecology and Nature Conservation chapter for relevant receptors. There is no reference to the assessment of air quality impacts within section 6.7.4 or 6.7.6 of the Ecology and Nature Conservation chapter. It is for the applicant to determine where within the ES to present the assessment of air quality effects on ecological receptors, however it should ensure that there is clear cross referencing and consistency between the two chapters so readers of each aspect chapter are clear the assessment has been undertaken.

ID	Ref	Description	Inspectorate's comments
333	Paragraph 6.5.8.1	Air quality baseline	The Scoping Report does not propose project-specific air quality surveys. It states that baseline conditions would be determined from data obtained from publicly available sources including local authorities, Air Pollution Information System (APIS) and the Department for Environment, Food and Rural Affairs (Defra). The approach should be discussed and agreed with relevant consultation bodies, and the ES should explain how the air quality monitoring data is representative of the baseline conditions.
334	Paragraph 6.5.4.2	Construction phase dust	The ES should clearly identify the discrete locations of activities with the potential to result in dust emissions. Should any areas of the draft Order limits be excluded from the assessment, this should be explained.
335	Paragraph 6.5.8.2	Construction and operational phase flaring	The ES should identify the composition of the emissions that would result from the flaring activities. The ES should confirm the assumptions made in the dispersion modelling, and sensitivity testing should be provided if the dDCO will allow for flexibility in the stack height.
336	N/A	Sensitive receptors	The ES should identify the locations of sensitive air quality receptors on appropriate plans.
337	N/A	Guidance	The applicant's attention is drawn to the Defra advice 'PM2.5 Targets: Interim Planning Guidance'. The ES should explain how key sources of air pollution within the proposed development have been identified and how action has been taken to minimise emissions of PM2.5 or its precursors.

3.4 Noise and Vibration

(Scoping Report Section 6.6)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
34.1	Table 6-20 and paragraph 6.6.7.1	Operational and maintenance noise from the buried pipeline (NV-G)	The Inspectorate accepts that no noise is expected to be generated from the buried pipeline during operation. It therefore agrees that there is no pathway for effect and that this matter can be scoped out of the ES. However, the Inspectorate does not agree with the applicant's position that there would be no noise from maintenance activities. Paragraph 2.6.1.1 notes that preventative and corrective maintenance activities would follow similar methods to construction of the pipeline. The Inspectorate directs the applicant's attention to ID 2.1.16 of this Opinion in relation to the assessment of effects from maintenance activities.
34.2	Table 6-20 and paragraph 6.6.7.1	Operational road traffic noise (NV-H)	The applicant proposes to scope out an assessment of operational road traffic noise on the basis that operational traffic flows are expected to be low. Given the operational nature of the proposed development, the Inspectorate agrees that operational road traffic noise is unlikely to lead to significant noise effects and that this matter can be scoped out of the ES. The Inspectorate directs the applicant's attention to ID 2.1.16 of this Opinion in relation to the assessment of effects from maintenance activities.
34.3	Table 6-20 and paragraph 6.6.7.1	Operational vibration assessment (NV-I)	Noting the operational nature of the proposed development, the Inspectorate agrees that significant vibration effects are unlikely and that this matter can be scoped out of the ES. However, the Inspectorate directs the applicant's attention to ID 2.1.16 of this Opinion in relation to the assessment of effects from maintenance activities.

ID	Ref	Description	Inspectorate's comments
344	Paragraph 6.6.3.9	Schools	Paragraph 6.6.3.9 states that there are no schools or hospitals within 600m of the scoping boundary. This is contradicted by table 6-18 which identifies Paull primary school and Easington primary school. The applicant should ensure consistency within the ES.
345	Paragraph 6.6.8.1	Noise monitoring locations	The ES should provide figure(s) displaying the location of noise monitoring in relation to any noise sensitive receptors.
346	Paragraph 6.6.8.17	Construction traffic	The Scoping Report states that DMRB LA 111 will be applied in the assessment, however the criteria for determining a significant effect in paragraph 6.6.8.17 differs from that stated within section 3 of DMRB LA 111. The ES should explain any departures from standard guidance.

3.5 Ecology and Nature Conservation

(Scoping Report Section 6.7)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
35.1	Table 6-34 and section 6.7.7	Greater Wash SPA (ECO-B)	The Inspectorate agrees that there is no pathway for effects to the Greater Wash SPA as all features are in the coastal or marine environment. Given the nature of the proposed development, this matter can be scoped out of the ES.
35.2	Table 6-34 and section 6.7.7	Marine mammals (ECO-O)	Subject to there being no construction activities within the River Humber (for example the use of cofferdams), the Inspectorate agrees that direct impacts such as collision and litter are unlikely to result in significant effects. However, the Inspectorate is unable to agree that noise and vibration impacts can be scoped out at this stage as it is currently not clear whether any works and/or surveys would be required within or adjacent to the estuary. In addition, there is no information on the expected noise and vibration levels associated with trenchless crossing techniques. An assessment of potential disturbance should be provided within the ES, or evidence of agreement with relevant consultation bodies that an assessment is not required.

ID	Ref	Description	Inspectorate's comments
35.3	Paragraph 6.7.3.6 and 6.7.3.7	Study area	The Ecology and Nature Conservation chapter applies a 10km study area (extended to 20km for site designated for geese). It is unclear why the extended study area for designated sites has been proposed for only geese. Consideration should be given to the study area in respect of mobile species such as other birds, bats, otters and fish. In addition, the study area contrasts with the 15km radius proposed for the assessment of operational and maintenance phase air quality impacts noted in the Air Quality

ID	Ref	Description	Inspectorate's comments
			chapter (paragraph 6.5.3.3). Paragraph 6.7.3.6 does note that the ecological study area will be reviewed following the preliminary results of the air quality impact assessment. The applicant is recommended to review the study area and seek to agree it with relevant consultation bodies. Once determined, the study area should be applied consistently across the ES for ecological receptors.
354	Paragraph 6.7.3.34	Invasive species	The Scoping Report identifies the presence of invasive species, however the potential for effects from the risk of spreading INNS has not been addressed in table 6-34. The Inspectorate notes commitment CO23 for an Invasive Non-Native Species (INNS) Management plan. An assessment of effects should be provided within the ES, where significant effects are likely.
355	Section 6.7.6	Protected and notable species	The Scoping Report does not identify any protected plant, fungi, or lichen species, for example those listed under Schedule 5 of the Conservation of Habitats and Species Regulations 2017 and Schedule 8 of the Wildlife and Countryside Act 1981, nor plant, fungi, or lichen species that are listed under s41 of the Natural Environment and Rural Communities Act 2006 as 'Species of Principal Importance'. The need for more detailed botanical surveys should be discussed and agreed with relevant consultation bodies. The ES should confirm the presence or absence of such species and provide an assessment of effects on the species, where significant effects are likely. Any avoidance, mitigation, or compensation measures for such species should be agreed, where possible, with relevant consultation bodies and the ES should explain how they would be secured through the dDCO.
356	Paragraph 6.7.6.2	Functionally linked land (FLL)	The loss of FLL is included in bullet point 3 of the list of potential construction impacts. The Inspectorate recommends that the area of FLL to be temporarily or permanently lost be visually mapped within the ES for ease of understanding. The potential for changes in habitat suitability at the FLL from the introduction of new drainage, changes in food availability, and disturbance effects should be assessed.

ID	Ref	Description	Inspectorate's comments
			Operational and maintenance disturbance effects should be assessed, or justification provided as to why effects are not likely to be significant. Consideration should be given to simultaneous and consecutive cumulative temporary losses with other proposed developments. The applicant's attention is drawn to the comments of Natural England (appendix 2 of this Opinion) in this regard.
35.7	Section 6.7.6	Noise disturbance	The applicant's attention is directed to the comments of Natural England (see appendix 2 of this Opinion) for advice on the assessment of disturbance impacts.
35.8	Section 6.7.6	Lamprey	Potential construction and operation impacts to lamprey migration routes should be assessed, including potential impacts resulting from noise and vibration and habitat loss or degradation.
35.9	Section 6.7.6	Likely significant effects – air quality	See ID 3.3.2 above. The ES should clearly assess any likely significant effects from air quality on ecological receptors.
35.10	Table 6-34	Likely significant effects	Table 6-34 identifies receptors, but does not specify which potential impact would be assessed for each receptor. The Inspectorate considers that not all potential impacts identified under section 6.7.6 'Likely significant effects to be considered in the EIA' would be relevant for all receptors. It should be clear within the ES which receptors are being assessed for which potential impact pathway. The applicant's attention is drawn to the comments of Natural England and the Environment Agency (see appendix 2 of this Opinion) regarding impact pathways to be assessed for specific sites and fish, respectively.
35.11	Paragraph 6.7.8.2	Bat activity surveys	The applicant should justify and seek to agree any deviations from standard bat activity guidelines with relevant consultation bodies including Natural England and the relevant county ecologist. The applicant's attention is drawn to the comments of Natural England (see appendix 2 of this Opinion) in this regard.

ID	Ref	Description	Inspectorate's comments
35.12	Paragraphs 3.2.4.3 and 6.7.8.2	Great crested newts (GCN) District Level Licensing (DLL)	The applicant intends to offset the effects of the proposed development on GCN by obtaining a licence through the Natural England DLL scheme. The Inspectorate understands that the DLL approach includes strategic area assessment and the identification of risk zones and strategic opportunity area maps. The ES should include information to demonstrate whether the proposed development is located within a risk zone for GCN. If the applicant enters into the DLL scheme, Natural England will undertake an impact assessment and inform the applicant whether their scheme is within one of the amber risk zones and therefore whether the proposed development is likely to have a significant effect on GCN. The outcome of this assessment will be documented on an Impact Assessment and Conservation Payment Certificate (IACPC). The IACPC can be used to provide additional detail to inform the findings in the ES, including information on the proposed development's impact on GCN and the appropriate compensation required.
35.13	Paragraphs 6.7.8.16 to 6.7.8.27	Habitats Regulations Assessment (HRA)	A scoping opinion is provided in respect of the ES. The Inspectorate does not provide comment on the proposed approach to HRAs.
35.14	n/a	Collision risk	Paragraph 2.4.2.9 notes that the AGIs would require connection to the local electrical distribution and telecommunication systems. If overhead lines are required, an assessment of bird collision risk should be provided, where significant effects are likely.
35.15	n/a	Bentonite breakout	The potential for potential bentonite breakout (frac-out) is acknowledged in the Water Resources and Flood Risk chapter. The risk of frac-out upon intertidal and coastal habitats should also be assessed in the ES, and contingency measures provided in the event of an incident occurring.
35.16	n/a	Invertebrates	The Scoping Report does not consider potential impacts on invertebrates. Ecological surveys should determine whether any habitats to be affected could support important invertebrate assemblages or priority species. The ES should include an assessment of effects, where significant effects are likely.

ID	Ref	Description	Inspectorate's comments
35.17	n/a	Sensitive environmental information	Under Regulation 12(5)(g) of the Environmental Information Regulations 2004 (EIR), public bodies have a responsibility to avoid releasing sensitive environmental information that could bring about harm to sensitive or vulnerable ecological features. Sections of the ES containing specific survey and assessment data relating to the location of sensitive species (e.g., badgers, rare birds, and plants) or other vulnerable environmental features should be provided in separate annexes by the applicant. This approach reduces the sensitive ecological feature's risk of disturbance, damage, persecution, or commercial exploitation arising from publication. The applicant's approach should be proportionate and only use these separate annexes for species where there is a genuine risk of harm. All other assessment information should be included in an ES chapter, as normal, with a placeholder providing a justification as to why annexes have been withheld and that a full version of the ES has been submitted to the Inspectorate.
35.18	n/a	Environmental data-sharing	The ES should clearly describe how environmental data collected during all phases of the proposed development will be shared with the relevant Local Environmental Records Centre(s) and any applicable environmental recording schemes, in line with best practice, and how these arrangements will be secured through the dDCO.

3.6 Landscape and Visual Assessment

(Scoping Report Section 6.8)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
361	Table 6-38 and section 6.8.7	Operation and maintenance of underground infrastructure (LV-C)	The Inspectorate agrees that significant effects from operation of the underground infrastructure are not likely as it would not be visible. This matter can be scoped out of the ES. However, the Inspectorate directs the applicant's attention to ID 2.1.16 of this Opinion in relation to the assessment of effects from maintenance activities.
362	Section 6.8.7	Local character areas and visual receptors beyond 1km from the proposed development	The Inspectorate considers an assessment of effects should be undertaken for receptors within the study area. Subject to the Zone of Theoretical Visibility (ZTV) confirming the study area (see ID 3.6.5 below), the Inspectorate is content this matter can be scoped out.
363	Section 6.8.7	Receptors in locations judged to have limited or no visibility following results on the ZTV	The Inspectorate agrees these receptors can be scoped out of assessment. However, the ES should contain an explanation for their exclusion.
364	Paragraph 6.8.4.4	Operational phase lighting	Subject to a demonstrable commitment that AGIs would be generally unlit except for short periods during maintenance, the Inspectorate agrees that significant effects from operational activities are not likely and this matter can be scoped out of the ES. However, the Inspectorate directs the applicant's attention to ID 2.1.16 of this Opinion in relation to the assessment of effects from maintenance activities.

ID	Ref	Description	Inspectorate's comments
365	Paragraph 6.8.3.2	Study area	The Scoping Report proposes a study area of 1km from the order limits due to the limited height of the AGI, the underground nature of the pipeline and the relatively flat nature of the surrounding landscape. Noting that flat topography can allow views to extend further than in more varied terrain, the Inspectorate considers the potential visibility of the proposed development should be confirmed by the ZTV mapping (proposed in paragraph 6.8.8.5). Assumptions made in the ZTV mapping should be set out, including the heights of construction machinery.

3.7 Historic Environment

(Scoping Report Section 6.9)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.7.1	Paragraph 6.9.4.4	Direct impacts to heritage assets - operation	The Scoping Report states that direct impacts to heritage assets are unlikely to occur during operation as groundworks would be limited in scale and any impacts would have occurred during the construction phase. The Inspectorate agrees that operation of the proposed development is unlikely to lead to significant effects on heritage assets and is content for this matter to be scoped out of further assessment.
3.7.2	Paragraph 6.9.7.1	Direct physical impacts to heritage assets outside the side boundary	The Inspectorate considers that there is no pathway for effect from direct physical impacts to heritage assets outside of the site boundary and agrees to scope this matter out of further assessment.
3.7.3	Paragraph 6.9.7.1	Indirect physical impacts to heritage assets outside the study area	Bullet point 2 of paragraph 6.9.7.1 refers to 'indirect physical impacts' but proceeds to refer to impacts on setting. For clarity, the Inspectorate is content that indirect physical impacts outside of the study area can be scoped out (notwithstanding the comments regarding the study area at ID 3.7.5 below). The Inspectorate's comments on impacts on the setting of heritage asset are included below.

ID	Ref	Description	Inspectorate's comments
3.7.4	Paragraph 6.9.3.4	Study area for setting effects	It is unclear why the study area for setting effects is proposed to be 500m, when the LVIA has proposed a 1km study area for visual effects. The Inspectorate agrees with the comments of Historic England (see appendix 2 of this Opinion) that an arbitrary 500m study area is not sufficient. However, the Inspectorate also notes the statement in paragraphs 6.9.3.4 to 6.9.3.5 that assets outside of the 500m study area would be

ID	Ref	Description	Inspectorate's comments
			identified through professional judgement, site visits, desk-based assessment, a bare-earth ZTV and consultation with LPA advisors. The Inspectorate considers this to be a reasonable approach which accords with Historic England's request for a more flexible and iterative approach to assessing the impact on the significance of designated heritage assets. However, the applicant is advised to include Historic England in the process described in paragraph 6.9.3.5 and to seek to agree the study area with all relevant consultation bodies.
3.7.5	Paragraph 6.9.4.3	Indirect physical impacts to heritage assets – construction phase	Paragraph 6.9.4.3 notes the potential for indirect impacts; however they are not proposed to be assessed in table 6-40. The ES should assess construction phase indirect physical impacts on heritage assets outside of the site boundary from dewatering, alteration of drainage patterns and changes to ground conditions, where significant effects are likely. A study area should be established, based on the anticipated zones of influence for these potential impacts. For the avoidance of doubt, the Inspectorate is content that an operational phase assessment is not required.
3.7.6	Paragraphs 6.9.8.7 and 6.9.8.8	Archaeology surveys	The Scoping Report states that the results of the desk-based assessment, site walkover and geophysical surveys will inform the need of intrusive archaeological evaluations to identify potential archaeology. The applicant should make efforts to agree the scope, methodology and timing of such activities with relevant consultation bodies including Historic England and the host local authorities. The ES should identify any uncertainties or assumptions applied and confirm whether any further survey and evaluation is required and how this would be secured through the dDCO.
3.7.7	Paragraph 6.9.7.1	Setting effects – construction phase	Paragraph 6.9.7.1 states that impacts to setting are likely to arise from the construction phase of the proposed development, although notes that works would be temporary in nature. An assessment of construction phase impacts is not proposed in table 6-40. The ES should assess setting effects in the construction phase for example due to the presence of machinery, dust, lighting, noise or from alterations to the landscape, where significant effects are likely.

ID	Ref	Description	Inspectorate's comments
3.7.8	Section 6.9.8	Assessment of setting effects	The assessment of impacts on the significance of heritage assets and setting should be supported by appropriate visualisations such as photomontages to help illustrate the likely impacts of the proposed development. Effort should be made to agree appropriate viewpoint locations for such visualisations with relevant consultation bodies including local authorities and Historic England. Cross reference should be made to the Landscape and Visual Assessment ES chapter to avoid duplication.

3.8 Traffic and Transport

(Scoping Report Section 6.10)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
38.1	Table 6-42 and paragraph 6.10.7.1	Hazardous loads (TT-E)	The Inspectorate acknowledges that all fuel deliveries would be undertaken by suitably qualified and licensed contractors, and all relevant legislation and best-practice guidance relating to the transportation and storage of hazardous substances will be adhered to. No other hazardous substances are expected to be transported to site in significant quantities. However, table 6-42 identifies a small to large magnitude, which when coupled with a high sensitivity has the potential to result in significant effects, as per impact IDs TT-A to TT-D. On this basis, the Inspectorate is therefore not in a position to agree to scope this matter out. Accordingly, the ES should include an assessment of likely significant effects arising from the transportation of hazardous loads during construction and decommissioning of the proposed development or provide evidence demonstrating agreement with the relevant consultation bodies and the absence of a likely significant effects.
38.2	Table 6-42 and paragraph 6.10.7.1	Operational traffic (TT-F)	The Scoping Report states that vehicle movements associated with operation would be negligible and limited to activities associated with inspection, monitoring, and general site up-keep. Subject to confirmation that anticipated operational phase vehicle movements would not exceed the thresholds set out in Institute of Sustainability and Environmental Professionals (2023) Guidelines for the Environmental Assessment of Road Traffic and Movement, the Inspectorate agrees that effects are unlikely to be significant and that this matter can be scoped out of the ES. The ES should also demonstrate that cumulative vehicle movements with other developments would not exceed relevant thresholds. However, the Inspectorate directs the applicant's attention to ID 2.1.16 of this Opinion in relation to the assessment of effects from maintenance activities.

ID	Ref	Description	Inspectorate's comments
38.3	Paragraph 6.10.3.8	Public Rights of Way (PRoW)	The assessment of impacts to users of PRoW should be supported by pedestrian/ user counts where necessary and efforts should be made to agree the locations for such counts with relevant consultation bodies. Where relevant, the ES should assess potential interaction effects between aspect assessments, for example noise, air quality, socio-economics and visual amenity. The locations of any diversions or closures should be illustrated on suitable figures in the ES.
38.4	Paragraphs 6.10.4.2 and 6.10.8.10	Abnormal indivisible loads (AILs)	Paragraph 6.10.4.2 notes that AILs may be required to transport items to the proposed development, although paragraph 6.10.8.10 states they are unlikely to be required. The ES should provide confirmation of anticipated AILs. The impacts on safety from the delivery of AILs should be assessed where significant effects are likely to arise. Appropriate measures to ensure safe transportation of abnormal loads (if any) should be described.
38.5	Section 6.10.8	Construction access points and vehicle routes	The expected routes of construction traffic to access all areas of the proposed site, including the pipeline route and construction compounds, and the anticipated number of vehicle movements (including vehicle type, peak hour and daily movements) should be included in the ES. The location of vehicle routes and access points should be clearly depicted on supporting plans. Noting paragraph 6.12.3.11 of the Waste Management chapter, anticipated routes to landfills should also be identified.
38.6	Table 6-44	Impact magnitude criteria	Professional judgement is proposed to inform impact magnitude for 'road user and pedestrian safety' and 'road vehicle driver and passenger delay'. The applicant should ensure transparency in the ES as to how impact magnitude has been derived and is advised to seek to agree these with relevant consultation bodies prior to application submission.
38.7	Tables 6-42, 6-44 and 6-45	Impact magnitude criteria - terminology	The impact magnitude terminology in tables 6-42 and 6-44 differs from that in table 6-45. The applicant should ensure consistency of terminology within the ES.

ID	Ref	Description	Inspectorate's comments
388	Paragraph 6.12.3.11	Residential receptors along routes to landfill	Paragraph 6.12.3.11 of the Waste Management chapter states that residential receptors along routes to landfills are considered in section 6.10 of the Traffic and Transport chapter. Section 6.10 does not identify specific receptors at this stage, nor reference routes to landfills. The ES should assess effects to these receptors, where significant effects are likely, and the applicant should ensure clear cross-referencing across relevant aspect chapters.

3.9 Socio-Economic Aspects

(Scoping Report Section 6.11)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
391	Table 6-48 and paragraph 6.11.7.1	Socio-economic effects from operational employment (SE-E)	The Scoping Report proposes to scope out this matter on the basis that operational employment effects are small compared to the overall market size. Based on the anticipated 30 permanent operational and maintenance phase jobs, the Inspectorate agrees that significant effects are unlikely and is content to scope this matter out of the ES. However, the ES should confirm the number of staff required during operation and maintenance of the proposed development.
392	Table 6-48 and paragraph 6.11.7.1	Wider socio-economic effects – operation (SE-F)	The applicant proposes to scope out an assessment of wider socio-economic effects during operation on the basis that operational employment would not result in notable knock-on effects for other sectors of the local economy and no impacts on tourism and agriculture are anticipated. The Inspectorate agrees that significant effects are unlikely and that this matter can be scoped out of the ES.
393	Table 6-48 and paragraph 6.11.7.1	Socio-cultural effects – operation (SE-G)	The Scoping Report seeks to scope out this matter on the basis that operation of the proposed development is unlikely to result in significant changes in local demographics or additional demand for services. The Inspectorate agrees that significant effects are unlikely and that this matter can be scoped out of the ES.

ID	Ref	Description	Inspectorate's comments
394	Paragraph 6.11.3.7	Baseline data	Paragraph 6.11.3.7 implies that data referred to is from 2003. It is unclear whether this is a typographic error. The baseline data presented within the ES should be as up-to-date as relevant data sets allow. If it is of considerable age, the ES should justify its use and any subsequent assumptions made.

3.10 Waste Management

(Scoping Report Section 6.12)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.10.1	Table 6-55 and paragraph 6.12.7.1 (WM-C)	Handling and disposal of waste – operation and maintenance, impacts on regional landfill capacity	The Scoping Report seeks to scope this matter out on the basis that no regular waste generation would occur during operation of the proposed development and as any waste generated by occasional maintenance activities would be limited to very small volumes. Paragraph 6.12.7.1 states that any waste generated during operation would be managed in line with the Waste Hierarchy and under an operational environmental management plan (OEMP). The Inspectorate notes that anticipated operational waste types and volumes are to be confirmed in the ES. It agrees that waste generation during operation is unlikely to result in significant effects and agrees this matter can be scoped out of the ES.

ID	Ref	Description	Inspectorate's comments
3.102	n/a	n/a	n/a

3.11 Major Accidents and Disasters

(Scoping Report Section 6.13)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.11.1	Table 6-61 and paragraph 6.13.7.1	Flooding and extreme weather (MAD-D)	The Inspectorate is content that flood risk would be assessed in the Water Resources and Flood Risk ES chapter and that an assessment does not need to be duplicated in the Major Accidents and Disaster ES chapter. The Scoping Report proposes that resilience to flooding and extreme weather would be managed through flood resilient siting and design of the AGIs, flood mitigation and appropriate drainage. It states that the buried pipeline would not be susceptible to wind or precipitation extremes. As detailed at ID 3.13.6 below, the Inspectorate considers that the ES should address the potential for the exposure of the pipeline during operation and/ or decommissioning due to increased rainfall intensity. Any likely significant effects should be assessed in the ES.
3.11.2	Table 6-61 and paragraph 6.13.7.1	Lightning (MAD-E)	The Scoping Report seeks to scope out this matter on the basis that the buried pipeline is not susceptible to lightning strike and the above ground equipment would incorporate lightning protection and earthing. The Inspectorate is content that lightning strike is unlikely to result in significant environmental effects and agrees that this matter can be scoped out of the ES.
3.11.3	Table 6-61 and paragraph 6.13.7.1	Seismic activity affecting buried pipeline and AGIs (MAD-F)	Based on the location and nature of the proposed development, the Inspectorate is content that seismic activity is unlikely to result in significant environmental effects. This matter can be scoped out of the ES.
3.11.4	Table 6-61 and	Subsidence and erosion impacting pipeline integrity (MAD-G)	The Scoping Report proposes to scope this matter out on the basis that effects from subsidence and erosion would be limited to localised ground conditions and there is no

	paragraph 6.13.7.1		credible pathway to major accident and disaster scale effects. The Inspectorate agrees that this matter can be scoped out of the ES chapter.
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ID	Ref	Description	Inspectorate's comments
3.115	Table 6-59	COMAH establishments	The Inspectorate recommends that the locations of the COMAH establishments relative to the proposed development are clearly depicted on a figure within the ES.

3.12 Human Health

(Scoping Report Section 6.14)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.121	Table 6-67	Risk taking behaviour	The Inspectorate is content that based on the nature of the proposed development, impacts on risk taking behaviour are unlikely to result in significant effects on human health and agrees to scope this matter out of the ES.
3.122	Table 6-67	Diet and nutrition	The Inspectorate is content that based on the nature of the proposed development, impacts on diet and nutrition are unlikely to result in significant effects and agrees to scope this matter out of the ES.
3.123	Table 6-67	Relocation	The Scoping Report proposes to scope out this matter as no relocation of residents is required as part of the proposed development. On this basis, the Inspectorate agrees that no significant effects are likely and is content to scope this matter out of the ES.
3.124	Table 6-67	Community identity, culture, resilience and influence	The Scoping Report proposes to scope out this matter on the basis that the proposed development is not likely to lead to any change to community identity and culture that would have an effect on human health at a population level. The Inspectorate is content with this approach and agrees to scope this matter out of the ES.
3.125	Table 6-67	Water quality or availability	The Scoping Report states that any effects assessed within the Water Resources and Flood Risk ES chapter are unlikely to have an effect on human health at the population level and proposes to scope this matter out of the ES. Based on the nature and location of the proposed development, the Inspectorate is content that significant effects on human health from water quality or availability are not likely and agrees this matter can be scoped out of the ES.

3.126	Table 6-67	Land quality	The Scoping Report states that any effects assessed within the Geology and Ground Conditions ES chapter are unlikely to have an effect on human health at the population level and proposes to scope this matter out of the ES. Based on the nature and location of the proposed development, the Inspectorate is content that significant effects on human health from land quality are not likely and agrees this matter can be scoped out of the ES.
3.127	Table 6-67	Radiation	The Scoping Report identifies the need for connection of the AGIs to the local electrical distribution system. It proposes to scope out effects associated with radiation on the basis that the proposed development would not result in human health effects from radiation at the population level. Provided the ES can demonstrate that any electrical infrastructure would remain below negligible levels in line with the International Commission Non-Ionising Radiation Protection (ICNIRP) guidelines (2020), the Inspectorate is content to scope out the potential for radiation effects on human health from further assessment.
3.128	Table 6-67	Built environment	The Inspectorate is content that based on the nature of the proposed development, impacts on the built environment are unlikely to result in significant effects on human health and agrees to scope this matter out of the ES.

ID	Ref	Description	Inspectorate's comments
3.129	Paragraph 6.14.2.11	Mental health	Paragraph 6.14.2.11 states that mental health will be considered in the assessment, however it is unclear from section 6.14.6 how these will be addressed. Impacts of all phases of the proposed development on mental health should be assessed, where significant effects are likely. The applicant's attention is drawn to the comments of North Lincolnshire Council (see appendix 2 of this Opinion) in this regard.

3.13 Climate Change

(Scoping Report Section 6.15)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.13.1	Table 6-72 and paragraph 6.15.3.17	GHG assessment: hydrogen use (downstream) (GHG-D)	The Inspectorate considers that given the proposed development comprises a multi-user distribution network supplying hydrogen to a range of currently unidentified third parties with diverse and variable applications, it is beyond the ability of the ES to meaningfully assess any particular downstream emissions resulting from user utilisation of the hydrogen transported. Therefore, the Inspectorate agrees that this matter can be scoped out of the ES.
3.13.2	Table 6-76 and paragraph 6.15.4.17	Climate resilience: precipitation change – water stress (CR-C)	The Scoping Report states that “water stress is defined as low risk by the World Resources Institute (WRI) water risk atlas”. It states that equipment, plant and infrastructure would be designed to consume low volumes of fresh and / or treated water. However, Anglian Water Services has noted that the western extent of the proposed development is identified as ‘seriously water stressed’ in the Environment Agency’s 2021 classification of water stressed areas (see response in Appendix 2 of this Opinion). In the absence of a demonstration that water demand can be met, the Inspectorate does not agree this matter can be scoped out. Should the applicant be able to demonstrate that agreement with relevant consultation bodies that water demand can be met, the Inspectorate agrees this matter can be scoped out of the ES. Alternatively, an assessment of likely significant effects should be presented.
3.13.3	Table 6-76 and paragraph 6.15.4.17	Climate resilience: sea temperature rise (CR-F)	The Inspectorate agrees this matter can be scoped out of the ES as marine infrastructure is not included in the proposed development.

3.134	Table 6-76 and paragraph 6.15.4.17	Climate resilience: wind (CR-G)	Noting the low height of the proposed AGIs, the Inspectorate is content that significant effects are not likely and this matter can be scoped out of the ES.
3.135	Table 6-76 and Paragraph 6.15.4.17	Climate resilience: wildfires (CR-H)	Noting that forest fire data indicates that the proposed development is not at risk of being impacted by wildfires, the Inspectorate is content that significant effects are not likely and this matter can be scoped out of the ES.

ID	Ref	Description	Inspectorate's comments
3.136	Table 6-76	Precipitation change (CR-B)	The ES should consider the implications of the exposure of pipeline during operation and/or decommissioning due to increased rainfall intensity. The methods of reburial should also be considered within the relevant management documents.

3.14 Cumulative Effects

(Scoping Report Section 7)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.14.1	Table 7-2	Geology and ground conditions: construction and operation and maintenance	Noting the spatial overlap with the proposed Humber Carbon Capture Pipeline, and the broadly comparable design approaches, the Inspectorate does not agree that the potential for significant effects can be ruled out at this stage. It agrees with the Environment Agency (see appendix 2 of this Opinion) that whilst each project may assess effects independently and conclude they are negligible, the combined effects may be significant. An assessment of cumulative effects should therefore be provided within the ES.
3.14.2	Table 7-2	Water resources: construction	
3.14.3	Table 7-2	Water resources: operation and maintenance	The Inspectorate agrees that significant cumulative effects are unlikely as operational surface water would be managed on site, and any effluent discharges would be required to meet the requirements of the Environment Agency in accordance with The Water Environment (WFD) (England and Wales) Regulations. Potential cumulative effects with other discharges would be fully considered under the permitting process. This matter can be scoped out of the cumulative effects assessment.
3.14.4	Table 7-2	Flood risk	The Inspectorate notes the Environment Agency's view (see appendix 2 of this Opinion) that cumulative flood risk should be assessed due to the spatial overlap with the proposed Humber Carbon Capture Pipeline, and the broadly comparable design approaches. Subject to the FRA considering other developments likely to occur with the wider area, the Inspectorate is content that cumulative flood risk will be inherently considered. However, the Inspectorate recommends that the applicant discusses the scope of the FRA with the Environment Agency to confirm that it addresses any concerns.

3.145	Table 7-2	Air quality: operation and maintenance	Table 7-2 states that cumulative impacts are not anticipated to be significant, however it is unclear whether the applicant intends to scope this matter out. The Inspectorate considers further work is required through dispersion modelling, as detailed in the 'Zone of Influence' column before this matter can be scoped out of the cumulative effects assessment.
3.146	Table 7-2	Landscape and visual assessment: operation and maintenance – buried infrastructure	The Inspectorate agrees that significant cumulative effects during the operational phase in relation to buried infrastructure are unlikely and can be scoped out of the cumulative effects assessment.
3.147	Table 7-2	Historic environment: construction	The Inspectorate agrees that significant cumulative effects on buried archaeology are unlikely as construction effects would be limited to within the application site. This matter can be scoped out of the cumulative effects assessment. However, the ES should assess cumulative setting effects and cumulative indirect effects on heritage assets, where significant effects are likely. In this regard, the applicant's attention is drawn to the comments of Historic England and the need to assess cumulative effects on the Grade I listed building of Paull Holme Tower and Scheduled Monument.
3.148	Table 7-2	Waste management: construction and operation and maintenance	The Inspectorate is content that cumulative effects will be inherently considered in the waste assessment and that further assessment is not required in the cumulative effects assessment.
3.149	Table 7-2	Major accidents and disasters	Table 7-2 states the cumulative effects are effectively controlled through other legislation enforced by the HSE. The Inspectorate acknowledges that safety legislation exists, but does not consider this sufficient justification to scope out potential impacts, particularly noting that potential effects from the proposed development alone have been identified and the connection of the proposed development to other linked developments. The Inspectorate does however note that MAD-C in table 6-61 proposes

			an assessment of domino effects to or from adjacent industrial sites and pipelines. The Inspectorate is content that this is, in effect, a cumulative effects assessment.
3.14.10	Table 7-2	Climate: GHG and climate resilience	The Inspectorate agrees that effects from GHG emissions are not geographically constrained, that the climate resilience assessment is specific to the proposed development and that the In-Combination Climate Change Impact Assessment (ICCI) assesses cumulative effects of climate change in the relevant environment topic. It agrees this matter can be scoped out of the cumulative effects assessment.

ID	Ref	Description	Inspectorate's comments
3.14.11	Section 7.4.1	Temporal considerations	The cumulative effects assessment should not be limited to cumulative construction or cumulative operational phase effects. There is the potential for cumulative effects to occur from the construction of the proposed development with the operation of another project (or conversely, from construction of another project with the operation of the proposed development). Any likely significant effects from overlapping construction and operational phases should be assessed.

4. APPENDIX 1: CONSULTATION BODIES FORMALLY CONSULTED

TABLE A1: PRESCRIBED CONSULTATION BODIES

Bodies prescribed in schedule 1 of The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 (as amended) (the 'APFP Regulations (as amended)')

SCHEDULE 1 DESCRIPTION	ORGANISATION
The Secretary of State for Defence	Ministry of Defence
The relevant parish councils	Preston Parish Council
	Easington Parish Council
	Sunk Island Parish Council
	Paull Parish Council
	Thorngumbald Parish Council
	Welwick Parish Council
	Aldbrough Parish Council
	Roos Parish Council
	Skeffling Parish Council
	Bilton Parish Council
	Sproatley Parish Council
	Burton Constable Parish Council
	Keyingham Parish Council
	Ottringham Parish Council
	Burstwick Parish Council
	Halsham Parish Council
	Burton Pidsea Parish Council

SCHEDULE 1 DESCRIPTION	ORGANISATION
	Patrington Parish Council
	Rimswell Parish Council
	Elstronwick Parish Council
	Humbleton Parish Council
	East Garton Parish Council
	Hedon Town Council
	Hollym Parish Council
	Holmpton Parish Council
	Withernsea Town Council
	Thornton Curtis Parish Council
	Ulceby Parish Council
	North Killingholme Parish Council
	East Halton Parish Council
	Barrow upon Humber Parish Council
	Goxhill Parish Council
	New Holland Parish Council
The Environment Agency	Environment Agency
Natural England	Natural England
The Forestry Commission	Forestry Commission - Yorkshire & North East
The Historic Buildings and Monuments Commission for England (known as Historic England)	Historic England
The Maritime and Coastguard Agency	Maritime and Coastguard Agency
The Maritime and Coastguard Agency - Regional Office	Maritime and Coastguard Agency - North East England

SCHEDULE 1 DESCRIPTION	ORGANISATION
The relevant internal drainage board	South Holderness Internal Drainage Board
	North East Lindsey Drainage Board
The relevant highways authority	East Riding of Yorkshire Council
	North Lincolnshire Council
	City of Kingston upon Hull Council
	National Highways
The Health and Safety Executive	Health and Safety Executive
United Kingdom Health Security Agency, an executive agency of the Department of Health and Social Care	United Kingdom Health Security Agency
NHS England	NHS England
The Coal Authority	Mining Remediation Authority
The Crown Estate Commissioners	The Crown Estate
The relevant police authority	Police and Crime Commissioner for Humberside
The relevant ambulance service	Yorkshire Ambulance Service NHS Trust
The relevant fire and rescue authority	Humberside Fire and Rescue Service

TABLE A2: RELEVANT STATUTORY UNDERTAKERS

‘Statutory undertaker’ is defined in The APFP Regulations (as amended) as having the same meaning as in section 127 of the Planning Act 2008 (PA2008)

STATUTORY UNDERTAKER	ORGANISATION
The relevant Integrated Care Board	NHS Humber and North Yorkshire Integrated Care Board
	NHS Lincolnshire Integrated Care Board

STATUTORY UNDERTAKER	ORGANISATION
NHS England	NHS England
The relevant NHS Trust	Yorkshire Ambulance Service NHS Trust
Railways	Network Rail Infrastructure Ltd
Railways	National Highways Historical Railways Estate
Dock and Harbour authority	Hull Port
	Humber Sea Terminal
	Immingham Port
Universal Service Provider	Royal Mail Group
Homes and Communities Agency	Homes England
The relevant Environment Agency	Environment Agency
The relevant water and sewage undertaker	Anglian Water
	Yorkshire Water
The relevant public gas transporter	Cadent Gas Limited
	Northern Gas Networks Limited
	Scotland Gas Networks Plc
	Southern Gas Networks Plc
	CNG Services Ltd
	Energy Assets Pipelines Limited
	ES Pipelines Ltd
	Fulcrum Pipelines Limited
	GTC Pipelines Limited
	Harlaxton Gas Networks Limited
	Independent Pipelines Limited
	Indigo Pipelines Limited

STATUTORY UNDERTAKER	ORGANISATION
	Inovyn Enterprises Limited
	Last Mile Gas Ltd
	Leep Gas Networks Limited
	Mua Gas Limited
	Quadrant Pipelines Limited
	Stark Infra-Gas Limited
	National Gas
The relevant electricity generator with CPO Powers	North Killingholme Power Project – Uniper UK Limited
	VPI Immingham OCGT
	Killingholme Power Station
	Saltend Power Station
The relevant electricity distributor with CPO Powers	Northern Powergrid (Yorkshire) plc
	Advanced Electricity Networks Ltd
	AGR Networks Ltd
	Aidien Ltd
	Aurora Utilities Ltd
	Edge Utility Networks Ltd
	Eclipse Power Distribution Limited
	Eclipse Power Network Limited
	Energy Assets Networks Limited
	ESP Electricity Limited
	Fulcrum Electricity Assets Limited
	Green Generation Energy Networks Cymru Ltd
	Grid Line Power Networks
	Harlaxton Energy Networks Limited

STATUTORY UNDERTAKER	ORGANISATION
	Independent Distribution Connection Specialists Ltd
	Independent Power Networks Limited
	Indigo Power Limited
	Last Mile Electricity Ltd
	Leep Electricity Networks Limited
	Mua Electricity Limited
	Optimal Power Networks Limited
	Sphere Energy Connect Ltd
	Stark Infra-Electricity Ltd
	The Electricity Network Company Limited
	UK Power Distribution Limited
	Utility Assets Limited
The relevant electricity transmitter with CPO Powers	Humber Gateway OFTO Limited
	National Grid Electricity Transmission Plc
	National Energy System Operator (NESO)
	TC Westernmost Rough OFTO Limited

TABLE A3: LOCAL AUTHORITIES AS DEFINED IN SECTION 43(3) OF THE PA2008

LOCAL AUTHORITY
West Lindsey District Council
Bassetlaw District Council
City of York Council
City of Doncaster Council
North Yorkshire Council

LOCAL AUTHORITY
Hull City Council
East Riding of Yorkshire Council
North East Lincolnshire Council
North Lincolnshire Council
Nottinghamshire County Council
Lincolnshire County Council

TABLE A4: THE MARINE MANAGEMENT ORGANISATION

Section 42(1)(a) of the PA2008 requires consultation with the Marine Management Organisation in any case where the proposed development would affect, or would be likely to affect, any of the areas specified in subsection 42(2).

ORGANISATION
The Marine Management Organisation

TABLE A5: NON-PRESCRIBED CONSULTATION BODIES

ORGANISATION
Hull and East Yorkshire Combined Authority
Greater Lincolnshire Combined County Authority

5. APPENDIX 2: RESPONDENTS TO CONSULTATION AND COPIES OF REPLIES

CONSULTATION BODIES WHO REPLIED BY THE STATUTORY DEADLINE:
Anglian Water
Bassetlaw District Council
East Riding of Yorkshire Council
Environment Agency
Forestry Commission
Fulcrum Pipelines Limited
Health and Safety Executive
Historic England
Holmpton Parish Council
Marine Management Organisation
Ministry of Defence
National Gas Transmission
National Grid Electricity Transmission
Natural England
North Lincolnshire Council
North Yorkshire Council
Nottinghamshire County Council
Royal Mail
Sphere Energy Connect
UK Health Security Agency
West Lindsey District Council

Hannah Terry
Senior Environmental Advisor
The Planning Inspectorate
By email:
humberhydrogenpipeline@planninginspectorate.gov.uk
contactus@humberhydrogenpipeline.com

Lancaster House, Lancaster Way,
Ermine Business Park, Huntingdon,
Cambridgeshire. PE29 6XU

www.anglianwater.co.uk
strategicgrowth@anglianwater.co.uk

Your Ref: EN0710006

Our ref: Humber Hydrogen Pipeline/
Scoping

15th June 2026

Dear Hannah,

HUMBER HYDROGEN PIPELINE - EIA SCOPING NOTIFICATION AND CONSULTATION - AWSRESPONSE

Thank you for the opportunity to comment on the scoping report for the Humber Hydrogen Pipeline the 'Project'.

The following response is submitted on behalf of Anglian Water Services (AWS) in our statutory capacity regarding water resources, the water supply network, water recycling centres (WRCs), water recycling assets and the sewer network, as well as the related role of surface drainage.

The scoping boundary shown in figure 2-1 in the Environmental Impact Assessment Scoping Report dated 21 May 2026, runs through the local authority areas of East Riding and North Lincolnshire and the Water Resource Zone (WRZ) of South Humber Bank. For context, AWS is the appointed sewerage and water undertaker for development within North Lincolnshire only, works relating to East Riding of Yorkshire is covered by Yorkshire Water.

AWS works to support the construction and operation of nationally significant infrastructure projects (NSIPs) that are conducted in accordance with the Water Industry Act 1991. In view of the guidance in the National Policy Statements e.g. Overarching National Policy Statement for Energy (EN-1) (December 2025) and (EN-4) (November 23) and 2024 IAQM guidance 15. AWS would expect the following points are assessed in the Environmental Impact Assessment (EIA) to set out how the project will be supplied with water and its wastewater managed; how water recycling and supply assets serving residents and business in the area will be protected; and how design has been altered to reduce the need for new infrastructure or the diversion of existing assets. This is relevant for the construction, operation and de-commissioning stages (as applicable).

AWS will work with developers, including those constructing projects under the 2008 Planning Act, to ensure requests for alteration of sewers, wastewater and water supply infrastructure are planned to be undertaken with the minimum of disruption to the project and customers. We would encourage on-going engagement to ensure that AWS and the developer have reached agreement on the approach to assets and connections in advance of the submission of the draft Development Consent Order (DCO) for examination.

The Project and Anglian Water Services Infrastructure

It is understood; the proposed development includes the extension of a hydrogen pipeline by approximately 54 km to provide a strategic hydrogen transmission link between hydrogen producers, consumers and storage within the Humber region. The proposed development will connect several separate facilities: Aldborough Hydrogen Storage, Hydrogen to Humber (H2H), and Saltend Chemical Park that will host H2H Saltend. AWS notes these facilities will be consented separately and therefore do not form part of the AWS response to the scoping report. The proposed development also includes a crossing beneath the Humber Estuary as part of the pipeline route; this will be covered within our response.

AWS supports the need for the proposed EIA to ensure a clear understanding of assumptions and cumulative construction impacts to represent a 'worst case' scenario, so that the assessment of likely significant effects is robust. AWS welcomes the use of the 'Rochdale Envelope' approach to address the flexibility of design (Chapter 2 – Section 2.2). It is acknowledged that due to the early stages of design and development of the project the precise locations and dimensions of structures and pipeline; nature of infrastructure and construction methods are unable to be confirmed. This is to allow for the consideration of ongoing engineering development, changes arising from environmental surveys and assessment and engagement feedback for input into the final design.

AWS notes that the scoping report identifies that there will be instances whereby the project interacts with the existing utilities infrastructure. AWS would therefore expect the next stages of the project (including the EIA) to include reference to any existing infrastructure managed and owned by AWS, and any provision of replacement infrastructure or new requirements.

Our Business Plan [Our Plan 2025 to 2030 - PR24](#) references record investment and obligation during this next AMP period (2025-30) and through an ambitious Water Industry National Environment Programme (WINEP) as agreed with the Environment Agency as the environmental regulator. This includes AWS own programme of projects for AMP8 (2025-30).

There are no identified strategic projects likely to interface with this proposal. Therefore, this letter will address the standard matters which AWS would comment on as the appointed water and sewerage undertaker.

General Comments

There are existing AWS assets both above and below ground, which serve the surrounding businesses and communities. There are several water mains and sewers within the project area within the highway or its verges which link to East Halton.

To reduce the need for diversions and the associated carbon impacts of those works, AWS's assets should be identified and mapped to establish interactions with the project with a view to designing the project to avoid impacts upon those assets. Where the project is likely to have a number of interfaces with our underground assets, we advise applicants to contact AWS to discuss provision of further technical/design assessments for clash detection, identification of potential diversions, and asset protection measures. AWS requires that the location and nature of our assets serving local communities have been identified and protected, during construction and operation of the project. This will help to ensure that the proposed order limits are suitable to accommodate such works and help de-risk the delivery programme for the project if any specific issues are identified at an early stage.

We recommend that the locations of our assets are initially identified from a desktop study of <http://www.digdat.co.uk/> to establish the extent of our assets within the scheme's application boundary. These should be mapped to establish interfaces with assets and the scheme designed to avoid impacts upon those assets.

For land investigation questionnaires relating to AWS's above ground assets and formal easements, you should contact our estates team on: awsstates@savills.com.

In addition, we strongly recommend that clash detection and asset assessment be undertaken by ourselves as early as possible and before the design fix. This ensures clarity, reduces risk, and supports the timely and efficient delivery of the project. We would not agree that a review of utilities plans is used to inform plans for proposed works prior to construction. Given the large number of NSIPs and other AWS projects being delivered in AMP8, there is a strong advantage to having upfront discussions with AWS in relation to our asset interfaces with the project.

Our National Infrastructure team is responsible for identifying AWS assets in relation to the DCO process. Early engagement is critical to ensure accurate assets data is captured and to avoid potential delays later in the project's lifecycle. Sharing data at an early stage enables timely clash detection and coordination. To support efficient assessment and integration into our systems, it would be helpful if any revised boundary/mapping is provided in Shapefile format so that we are able to update our records.

Engagement with us on the asset interfaces of the project can include:

- Clash detection and resolution
- Early design and technical assurance
- Asset protection and diversion planning
- Coordination with AWS investment schemes (current and planned)
- Review of red line boundary implications

You will be assigned a single point of contact (myself) who will coordinate engagement across relevant teams, including the National Infrastructure Team. Discussions with AWS around project scope, timescales, and other key details will ensure that tailored, project-specific advice can be provided to help de-risk the delivery programme as the Project comes forward.

Whilst, costs would be incurred to support project development and internal planning, this can be discussed further with the Applicant. This would provide a high-level desktop assessment of each interface between the project and AWS assets or projects, and will be dependent on project size, complexity and requirement from the project. Typically, this includes input from both AWS and our delivery teams.

This process will also help to inform mitigation measures in the Construction Best Practice for underground pipelines, as well as any other environmental and traffic management plans. AWS will need to be a consultee set out in the Requirements of the DCO for the approval of these detailed management plans.

The project should seek to assess whether there are any diversion requirements, the appropriate method of pipeline installation (Open Cut or Trenchless), and suitable mitigation of thermal dispersion and contamination impacts from the construction and operation of underground pipelines, particularly around Source Protection Zones.

AWS considers that where there are interfaces between the project and AWS assets, a Protective Provisions Agreement will be required and included within the draft DCO. As a starting point, AWS requires that the following standoff distances are applied for working each side of the medial line of AWS pipes where construction works are undertaken – including where the pipeline is underground and above ground compounds.

This information is extracted from our Protective Provisions template (copy attached):

- (a) 4 metres where the diameter of the pipe is less than 250 millimetres
- (b) 5 metres where the diameter of the pipe is between 250 and 400 millimetres, and
- (c) a distance to be agreed on a case-by-case basis and before the submission of the Plan under sub-paragraph (1) is submitted where the diameter of the pipe exceeds 400 millimetres

Source Protection Zones

Chapter 6 of the scoping report identifies the water resources and surface water receptors relevant to the proposed development. These include rivers, ordinary watercourses, and field drainage channels associated with the Humber Estuary, notably Skitter Beck and East Halton Beck (Chapter 6, Paragraph 6.4.3.10). The chapter assesses the potential for significant effects arising from the construction, operation, maintenance, and decommissioning phases of the project, with particular consideration given to impacts on these surface water features.

While paragraph 6.3.3.18 confirms that there are no groundwater Source Protection Zones (SPZs), which are designated to safeguard public groundwater supply abstractions, within the Study Area, paragraph 6.3.5.3 sets out mitigation measures will be developed to avoid, minimise, or reduce any adverse impacts. It goes on to state, the need for additional measures will depend on the significance of effects on ground conditions and land quality and will be agreed with statutory consultees as part of the EIA process.

Furthermore, paragraph 6.3.5.4 states that, following the baseline assessment and identification of potential impacts, the Environmental Statement (ES) will set out clear commitments to mitigation measures to be implemented by contractors, including procedures to address any previously unidentified contamination encountered during construction. The project team anticipates most mitigation for this topic will be secured through the implementation of a Code of Construction Practice (CoCP), which will include a Materials Management Plan, with an outline CoCP to be provided within the ES.

AWS supports this approach, noting the western proposed pipeline route within its area does not intersect any Source Protection Zones. However, AWS operates abstraction points to the south and west of the project boundary and therefore recommends that all subsurface infrastructure is designed to minimise disruption to existing groundwater flow pathways, in order to prevent localised increases in groundwater flood risk and avoid impacts on water resource availability in nearby areas outside, but close to, the proposed development. AWS expects that appropriate groundwater protection measures will be implemented to safeguard principal aquifers used for drinking water abstraction and requests continued engagement, ideally through stakeholder liaison meetings, once route options and proposals are more clearly defined. AWS also supports retaining groundwater risk within the scope at this stage, given the proximity of abstraction points to the site.

Any proposed dewatering activities should be addressed through the Environment Agency's National Permitting Service, in terms of granting licenses, while ensuring sufficiency of groundwater resources for abstractors and the environment.

Ground Conditions and Land Contamination

Section 3 of Chapter 6 addresses contamination in terms of construction, operation and decommissioning activities on hydrogeology and identifies the most significant effects in terms of contamination are likely to arise during the construction phase. As detailed above, AWS operates groundwater abstraction points to the south and west of the study area and AWS acknowledges that the scoping report identifies that there are no groundwater Source Protection Zones (SPZs), which are designated to safeguard public groundwater supply abstractions.

It is understood from Appendix 1: Draft Commitments Register that several mitigation related commitments are proposed, which the project team intends to secure through requirements in the final DCO or via relevant management plans (paragraph 6.12.5.2).

Accordingly, AWS would request they be included as a consultee within the DCO Requirements for the approval of detailed management plans covering these matters. The current design flexibility, together with the unknown locations of the final pipeline or above-ground installations, gives rise to concerns that construction or operational activities could adversely affect the groundwater abstraction points to the south and west of the study area in terms of water quality. Further clarity on these aspects would therefore be welcomed.

AWS would expect that potential impacts and associated mitigation measures are clearly identified and implemented through the Construction Environmental Management Plan (CEMP) to ensure that AWS assets are not adversely affected in terms of quality, quantity, or structural integrity. This should include measures to address risks from fuel, chemical, and material storage, as well as the mobilisation of any existing ground contamination. AWS will also seek assurance that appropriate controls are in place to reduce the risk of contamination that could affect public water supply abstractions and to minimise the risk of damage to water supply and sewerage assets, which could in turn present pollution risks to the local environment.

Further information is requested in relation to the proposed groundworks, particularly deep excavations in proximity to AWS assets, for review. AWS would also welcome a meeting to discuss these matters in more detail.

Water Management

AWS seeks clarification on the following matters:

- If water recycling/ sewerage services are required from AWS (all stages).
- If a water supply is required (all stages).
- Whether the management of surface water will require a public sewer connection.

AWS requests that these points are fully assessed and confirmed in the EIA. Further advice is provided below.

Water recycling/ sewerage services

AWS would seek to understand how wastewater from the project including during construction; testing; ongoing operation and de-commissioning are intended to be managed. As part of a drainage strategy, details of how wastewater is intended to be disposed of, such as a connection to an available public sewer, will need to be confirmed at all project stages within the EIA. The Scoping Report does not detail if there would be a

need for a permanent foul drainage solution for any of the proposed above ground sites. As such, AWS also seek to understand the requirement of any above ground site operations, options may include connecting to the nearest available public sewer or a self-contained independent non-mains domestic storage and/or treatment system.

We would suggest that this is confirmed at an early stage, or that a pre-application is made to request a connection through our [InFlow | Development Services](#) platform, so that connections can be appropriately planned for.

Water Resources and Water Supply

The western extent of the project which is within the AWS region is located within the South Humber Bank Water Resource Zones (WRZ). The AWS region is identified as 'seriously water stressed' in the Environment Agency's 2021 classification of water stressed areas. AWS notes the requirement of water supply for the construction and hydrostatic testing of the pipeline. One specific point for the Environmental Statement (ES) therefore and in view of the potential impacts on water resources, is that the applicant is advised to consider the published Water Resources East Regional Plan [Regional Plan](#) which sets out the collective water companies position in the East of England.

The Water Resource Management Plan (WRMP) for AWS is available on our website and we would advise these documents are referenced in the Bibliography/ References of the EIA, as a data source.

As water will be used in the project, impacts of climate change in terms of water availability for the construction, operation and decommissioning stages are also of relevance.

There is a need to ensure that any development proposals do not have an adverse effect on any existing boreholes which are used to supply the public with drinking water. The EIA will need to consider water resources and water efficiency through the preparation of a Water Resources Assessment (WRA). AWS recommends that the WRA is an integral part of the chapter on Water Environment.

For applications under the 2008 Act, the WRA (or its summary) should form part of the EIA sufficient to enable regulators including the Environment Agency to advise the Examining Authority and the Secretary of State that the supply of water to the project is deliverable and sustainable. A WRA would include setting out a daily demand for each stage of the project and whether this is for domestic or non-domestic uses. AWS recommends that the WRA is an integral part of the EIA.

The project should not assume that water will be available for construction and operation. If that water supply is not available from Anglian Water, then alternative supplies through local abstraction may cause environmental harm and so not be consented by the Environment Agency. The construction of alternative water supplies may themselves generate Green House Gases (GHG).

AWS has a statutory duty to supply water for domestic purposes. This means we are legally obliged to supply water to all household properties as well as any domestic requirements (e.g., drinking water, hand-basins, toilets and showers) of non-household properties. In many cases, domestic demand will be the only requirement for non-household properties (e.g., schools, hospitals, offices, shops and hairdressers). Non-domestic demand refers to water use for industrial processes, (e.g., agri-food production or car washes), and there is no legal requirement for us to supply for this type of water usage where it might put at risk our ability to supply water for domestic purposes.

Although AWS does not have a statutory obligation to supply for non-domestic purposes in these circumstances, we factor this into our WRMP and we do everything we can to support businesses in the region, with the help of the water retail market.

AWS has adopted a [Non-domestic demand](#) December 2024' (copy attached) which states that requests over 20m³/day will be declined. However, for NSIPs that are requesting over 20m³/day of non-domestic water (as defined above) for a scheme, a Water Resources Assessment (WRA) form must be completed [Water Resource Assessment \(NSIPS and SDOs\) - template Feb 2025 FINAL.docx](#). This is so we can better understand water demands, water efficiency measures and more effectively forecast water supply requirements. This will help enable us to support projects that help achieve national ambitions such as achieving net zero carbon and unlocking sustainable growth.

Our new position on non-household supply is due to our joint aim with the Environment Agency of reducing abstraction to protect sensitive environments. AWS now advise that new non-household water supply requests (construction and operational phases) may be declined as these could compromise our regulatory priority of supplying existing and planned domestic growth.

The flows needed to fill water storage tanks for example (if rainwater harvesting on site is not used to meet non-potable demand) will need to be assessed by AWS to advise whether a supply is feasible, when assessed in terms of the potential to jeopardise domestic supply or at a significant financial or environmental cost.

AWS recommends that new water supply connections are not sought during construction and that potable water supply for welfare facilities, for example, are served by tanker. The Applicant should confirm that there will be no temporary concrete batching facilities with consequent water demands and would be offsite and so not require an on-site supply. Water requirements for firefighting measures and construction traffic (dust suppression/ wheel washing areas) should also be explained.

We would advise you to contact planningliaison@anglianwater.co.uk to discuss the need for water and wastewater connections. The team can take you through the Inflow registration process [InFlow | Development Services](#), the need to submit a pre-planning enquiry request and the requirement to complete a WRA form which will also need to be included in the EIA. This should set out a daily demand for each stage of the project and whether this is for domestic or non-domestic uses. A copy of our WRA template is attached.

Flooding and Surface Water Drainage

AWS is responsible for management of the risks of flooding from surface water which are directed to foul water or combined water sewer systems and welcomes the completion of a Flood Risk Assessment (FRA) and Water Framework Directive (WFD) Assessment. It is unclear whether a Surface Water Management Plan (SWMP) will be included, however, AWS recommends a SWMP is completed to inform the impacts in the Hydrology, Hydrogeology and Flood risk associated with the project.

Our advice on surface water management is available here: [aws-surface-water-guide-sm.pdf](#) Potential embedded design measures should include Sustainable Drainage Systems (SuDS) to be utilised at permanent above ground installations to manage rainfall run-off and achieve sufficient attenuation to avoid increases in flood risk, and compensation flood storage at temporary site compounds to manage flood risk at these locations.

AWS will not accommodate any surface water run-off into a foul sewer, and only to a combined sewer in exceptional circumstances. Our preference would be for surface water run-off from above ground permanent

buildings and impermeable surfacing to be managed by SuDS with any outfall to a watercourse, in accordance with the drainage hierarchy.

The FRA should consider any increased risk of surface water and groundwater flood risks arising from the scheme that could exacerbate sewer flooding risks due to infiltration/ingress to our networks. The likelihood of more extreme weather events leading to higher-than-average rainfall and cumulative impacts of storm events, as recently experienced during Winter 2023/24, mean that infrastructure becomes increasingly vulnerable to flood risk. The project should aim to minimise any flood risks as far as possible by designing in measures to limit increased flood risks to utilities infrastructure.

Flooding from other sources should include reference to AWS infrastructure and further detail provided regarding potential temporary effects on flood risk from third party infrastructure works during construction of the project should be provided in the FRA, given the interfaces between the project and AWS assets. These interfaces will also be managed through the Protective Provisions and agreed construction practices.

Subject to confirmation that all surface water will be managed following the drainage hierarchy, including SuDS, AWS would want to clarify that the DCO as proposed will have no connection to the public sewer network for construction or for operations. This would then negate the need for the draft DCO Order to provide for any connection and so require consequent Protective Provisions and Requirements to ensure any connections did not compromise the wastewater services of existing customers.

We consider that SuDS and the potential for rainwater harvesting to serve any non-potable water requirements, should be used. Notwithstanding the lead roles of the Lead Local Flood Authority, the Environment Agency and the Internal Drainage Boards, AWS would welcome clarification on how consequent impacts on the local drainage/ sewerage network will be designed as part of the scheme. AWS will be a consultee set out in Requirements for the approval of drainage strategies and surface water management plans.

We would encourage any pre-planning enquiries are made through our InFlow platform to ascertain the most appropriate solution is taken forward.

Scope of Environmental Impacts and Effects

Whilst most of the land within the draft order limits is agricultural there are interfaces with some of our water and sewer pipes that operate under pressure. The Scoping Report identifies sources of flooding in terms of fluvial flooding events, storm events, and sewer flooding, but does not identify flooding from other sources such as damage to utilities. However, further detail regarding potential temporary effects on flood risk from third party infrastructure works during construction of the project should be provided in the Flood Risk Assessment; given the interfaces between the project and AWS assets.

These interfaces should be managed through the Protective Provisions for AWS and agreed construction practices in the CEMP. Horizontal direct drilling (HDD) will need to take account of rising mains (pressurised sewer) to avoid pollution risk to protected habitats.

Approach to Cumulative Effects

AWS welcomes the use of a Cumulative Effects Assessment (CEA) as part of the EIA process to assess the inter relationships and cumulative effects of the project with other developments on the same single receptor or resource. AWS recognises that cumulative schemes are generally based on existing and/or approved

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development, given that the information is readily available from local authority planning registers or the Planning Inspectorate website. It is not clear whether projects in early stages of development that are brought to the attention of the Applicant and have the potential to interact in a cumulative manner, will be considered.

Management Plans

It is understood from Chapter 6 that relevant management plans such as the Construction Environmental Management Plan (CEMP), Operational Environmental Management Plan (OEMP) Construction Traffic Management Plan (CTMP), and Surface Water Management Plan (SWMP) are to be secured through requirements in the final DCO. Accordingly, AWS would request they be included as a consultee within the DCO Requirements for the approval of detailed management plans covering these matters.

Notwithstanding the above, AWS recommends outline management plans are prepared at an earlier opportunity to ensure any adverse impacts of construction, operation and decommissioning are picked up and adequately mitigated.

The outline Construction/ Operational and Decommissioning Environmental Management Plans should include mitigation measures required to safeguard and remove the risk of damage to AWS's assets, both below ground and above, from plant and machinery interference (compaction and vibration during the construction phase) including haul and access roads. The impact of traffic vibration on underground water/sewer mains will need to be identified sufficiently. This is mainly a risk where the depth of soil covering our assets has been reduced due to the construction of temporary construction compounds, bellmouths and haul roads used by construction traffic. We would seek appropriate mitigation measures to be addressed in the various construction, traffic and noise/ vibration management plans to avoid any adverse impacts arising from construction traffic vibration on the operation of our assets.

Further advice on minimising and then relocating (where feasible) AWS existing assets can be obtained from: connections@anglianwater.co.uk

Major accidents and disasters

AWS welcomes section 6.13 of chapter 6 which addresses Major Accidents and Disasters. AWS identifies that the site is crossed by AWS utilities, including easement and separation distances required to be maintained. AWS would welcome specific reference on how the interfaces with utility assets such as sewers and water supply within the Order Limits will be managed through the construction of haul roads, bellmouths etc. Whilst Protective Provisions should address those interfaces with our assets, we would welcome further discussion with the applicant regarding such matters and their inclusion in the final versions of the DCO documents.

These documents should include steps to remove the risk of damage to our assets from plant and machinery (compaction and vibration during the construction phase) including any haul and access roads and crossings. AWS would seek to safeguard 24 hours /7-day access to our assets, and that this is not compromised. We would, therefore, welcome further discussion with the applicant regarding such matters and their inclusion in the finalised documents. AWS consider that until the clash assessment has been undertaken by AWS then likelihood and magnitude impacts cannot be assessed and so it is not possible to scope out these impacts from the EIA.

Engagement and Next Steps

Chapter 8 refers to the consultation process proposed for the project, as a statutory consultee and the water and sewerage undertaker for part of the area defined by the scoping boundary, AWS would welcome structured engagement with the Applicant throughout the forthcoming stages of the project. To address and resolve issues prior to the submission of the DCO, including Protective Provisions, in line with the requirements of the 2008 Planning Act and guidance.

Experience has shown that early engagement and then agreement is required between NSIP applicants and statutory undertakers during design and assessment and well before submission of the draft DCO for examination.

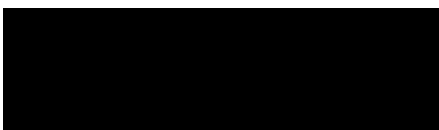
Consultation at the statutory stages of consultation would in our view be too late to inform design and may result in objections and delays to the project, including potential requests to change the project's Order Limits, to ensure services to existing customers and future growth are not prejudiced. We would encourage, the preparation of a Statement of Common Ground (SoCG) which should document key issues and the status of whether issues have been resolved or remain under discussion, which helps to reduce the Examining Authority questions for statutory undertakers and removes the possible need for changes to the project during Examination.

AWS will seek to engage further with the Applicant through the forthcoming phases to discuss, amongst other matters:

- Impact of the development on AWS water supply, treatment, and recycling assets.
- The design of the project to minimise interaction with AWS existing and planned assets/ critical infrastructure and specifically to avoid the need for mitigation works and diversions which have associated carbon costs.
- Requirement for potable and raw water supplies (if any) and the inclusion of the Water Resource Assessment in the Environmental Impact Assessment.
- Requirement for water recycling connections (if any).
- Confirmation of the project cumulative impacts with AWS projects detailed within the consultation response and the need for further engagement on these matters.
- Confirmation on the appropriate design/ mitigation of proposed works in the vicinity of groundwater abstraction points and corresponding source protection zones (1 and 2).
- Draft Bespoke Protective Provisions and Requirements.
- The preparation of a draft Statement of Common Ground prior to submission.

Please do not hesitate to contact me on these aspects so they can be progressed during the pre-application to decision stages of the project, or should you require clarification on the above response.

Yours sincerely,



Strategic and Spatial Planning Lead – Sustainable Growth

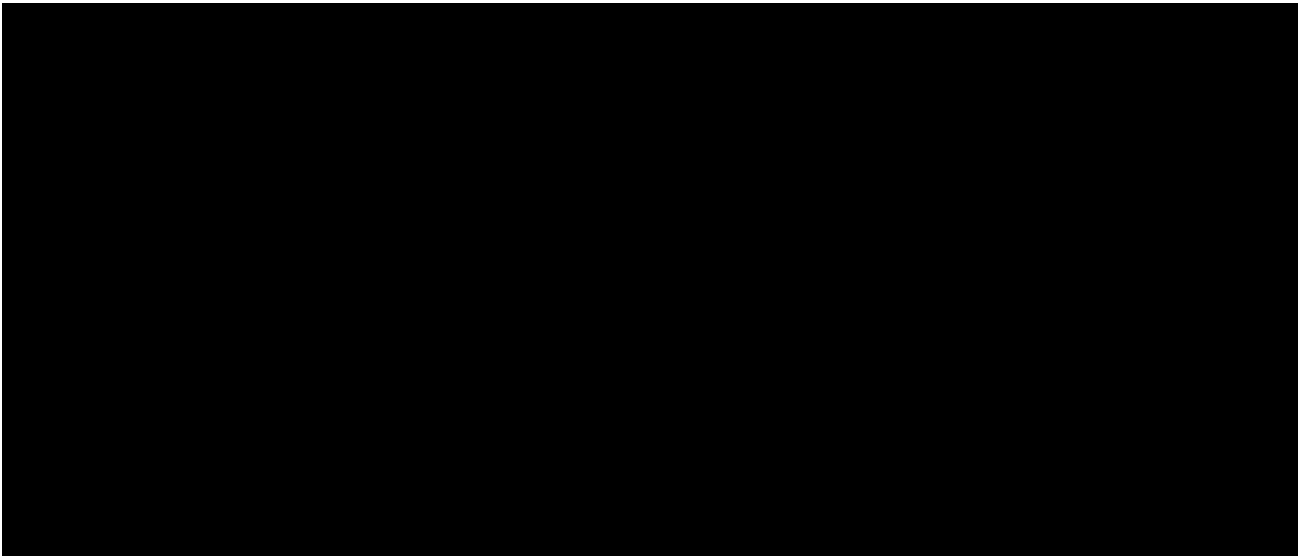
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Fw: Your Ref - EN0710006



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From: [REDACTED]
Sent: Tuesday, June 23, 2026 09:14
To: Humber Hydrogen Pipeline; Humber Hydrogen Pipeline
Subject: Fw: Your Ref - EN0710006

[REDACTED]

Dear Hannah

I write in connection with the above.

I am aware that the deadline for comments to you is tomorrow (12th), however I am writing to inform you that to date I have only received two consultee comments (Historic England and NATS), copies are attached for your information. The consultation deadline is not until the 17th, if any more are received between now and then I will send them over in a separate email.

Any issues please let me know

Kind Regards

[REDACTED]

[REDACTED]

Development Management Team Leader

Bassetlaw District Council

Queens Buildings
Potter Street
Worksop
Nottinghamshire S80 2AH

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Development Management Team Leader
Bassetlaw District Council, Potter Street, Worksop, Nottinghamshire, S80 2AH
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From: [REDACTED]@bassetlaw.gov.uk>

Sent on: Wednesday, June 3, 2026 11:17:16 AM

To: Planning <planning@bassetlaw.gov.uk>

Subject: FW: Planning Application Consultation 26/00621/SCO

Hi

Please send DMS

Cheers

From: Midlands ePlanning <e-midlands@HistoricEngland.org.uk>

Sent: 03 June 2026 11:45

To: [REDACTED]@bassetlaw.gov.uk>

Cc: [REDACTED]@HistoricEngland.org.uk>

Subject: RE: Planning Application Consultation 26/00621/SCO

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Hi Lisa, Thank you for your email last week. Historic England are statutory consultees on NSIPs and we have responded to PINS direct. Best wishes, [REDACTED]

Business Officer The Foundry, 82 Granville Street, Birmingham, B1

2LH [REDACTED] historicengland.org.uk [REDACTED]

CGBANNERINDICATOR

Hi [REDACTED],

Thank you for your email last week.

Historic England are statutory consultees on NSIPs and we have responded to PINS direct.

Best wishes, [REDACTED]

[REDACTED]

Business Officer

The Foundry, 82 Granville Street, Birmingham, B1 2LH

[REDACTED]@historicengland.org.uk

[REDACTED]

[REDACTED]



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[REDACTED]@bassetlaw.gov.uk <[REDACTED]r@bassetlaw.gov.uk>

Sent: 27 May 2026 09:39

To: Midlands ePlanning <e-midlands@HistoricEngland.org.uk>

Subject: Planning Application Consultation 26/00621/SCO

-- WARNING: This is an external message. Please use caution when replying, opening attachments or clicking on any links in this e-mail.--

Please see attached consultation

[Bassetlaw District Council] [REDACTED]

Planning Technician

Bassetlaw District Council, Potter Street, Worksop, Nottinghamshire, S80 2AH

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[REDACTED]

Planning Technician

[REDACTED]

From: [REDACTED]
Sent: 01 June 2026 09:06
To: Planning
Subject: FW: Planning Application Consultation 26/00621/SCO [SG41577]

Please upload to DMS
Cheers

From: NATS Safeguarding <NATSSafeguarding@nats.co.uk>
Sent: 29 May 2026 12:47
[REDACTED]@bassetlaw.gov.uk>
Cc: NATS Safeguarding <NATSSafeguarding@nats.co.uk>
Subject: RE: Planning Application Consultation 26/00621/SCO [SG41577]

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Good afternoon, NATS acknowledges receipt of the Consultation. NATS operates the Ottringham DVOR/DME aeronautical beacon in the area. However, from a preliminary look, assuming none of the planned routes are within 3km of the beacon location (53.698200° -0.103720°) it anticipates no impact from the proposal. Accordingly, NATS has no comments to make on the Scoping Opinion but will review further plans as more details become available.

Regards
[REDACTED]
NATS Safeguarding Office

NATS

[REDACTED]
ATC Systems Safeguarding Engineer

[REDACTED]
[REDACTED]@nats.co.uk

4000 Parkway, Whiteley,
Fareham, Hants PO15 7FL

www.nats.co.uk

NATS Internal

From: [REDACTED]@bassetlaw.gov.uk [REDACTED]@bassetlaw.gov.uk>
Sent: 27 May 2026 09:39

To: NATS Safeguarding <NATSSafeguarding@nats.co.uk>

Subject: Planning Application Consultation 26/00621/SCO [SG41577]

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Please see attached consultation

[Bassetlaw District Council] 

Planning Technician

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Lisa Kruijer
Planning Technician



Your Ref: EN0710006
Our Ref: 25/02496/NSIP
Email: [REDACTED]@eastriding.gov.uk
Tel Direct: [REDACTED]
Date: 19th June 2026

Dear Ms Hannah Terry,

Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (The EIA Regulations) – Regulations 10 and 11.

Proposed application by Humber Hydrogen Transmission System Ltd (the applicant) for an Order granting Development Consent for the Humber Hydrogen Pipeline (the proposed development)

Re: Scoping Consultation and request for comments from East Riding of Yorkshire Council

The Planning Inspectorate has consulted East Riding of Yorkshire Council (ERYC) with a request to:

- inform the Planning Inspectorate of the information it is considered should be provided in the ES, or;
- confirm we do not have any comments

The following information reflects the views of the Local Planning Authority and its internal consultees regarding the information contained within each chapter / sub-heading of the Scoping Report submitted to the Planning Inspectorate on 21 May 2026. Where consultee comments have not been received by the response deadline, these will be sent to PINS for forwarding to the applicant.

Introduction:

To prepare these comments, ERYC have consulted with the following internal consultees:

Transport Planning
Land Drainage and Lead Local Flood Authority
Environmental Control
Nature Conservation
Building Conservation
Trees
Countryside Access and Definitive Map teams (PRoW)
Forward Planning
Sustainable Development
Transport Policy
Invest East Yorkshire and Business Support
Public Health
Archaeology

Adam Holmes/Stephen Hunt
Interim Executive Director of Prosperity and Place

Coastal Management

Responses were received from Transport Planning, Lead Local Flood Authority, Definitive Map team, Sustainable Development, Invest East Yorkshire and Business Support, Public Health, Archaeology and Coastal Management. These comments have been included in this report on a topic-by-topic basis in the paragraphs below.

1.0 Highways

1.1 Humber Hydrogen Transmission System Ltd (HHTS), a partnership between National Gas Transmission, Equinor, SSE Thermal and Centrica Energy Storage, is proposing to design, construct, operate and maintain, and ultimately decommission the Humber Hydrogen Pipeline (HPP) Project. The Proposed Development will consist of a hydrogen pipeline extending approximately 54 km in length, which will provide a strategic hydrogen transmission link between hydrogen producers, consumers, and a storage facility within the Humber region, as well as industry located within North Lincolnshire. The Proposed Development will connect a number separate facilities: Aldborough Hydrogen Storage (a proposed underground hydrogen storage facility at Aldborough), Hydrogen to Humber (H2H) Easington (a proposed hydrogen production facility at the Easington terminal) and Saltend Chemical Park that will host H2H Saltend (a proposed hydrogen production facility at Saltend Chemicals Park), although these facilities will be consented separately and are therefore not part of the Proposed Development. The Proposed Development also includes a crossing beneath the Humber Estuary as part of the pipeline route.

1.2 The applicant has submitted the following questions as part of this report:

1) *Do consultees agree with the Study Area that has been identified?*

A: Although the study area is described in section 6.2 (table 6.1: study areas), ERYC would like to see this presented as a map, simply listing all roads used to access the pipeline route does not consider the impact on other routes effected by the development's construction traffic. This can be further reviewed along with the TA and CTMP when they are submitted.

2) *Do consultees agree that the baseline data sources identified are sufficient to adequately characterise the baseline?*

A: The proposed baseline sources are acceptable; however, this will need to align with the requested study area map mentioned in the answer to question 1 above.

3) *Do consultees agree that all potentially significant effects that could arise from all stages of the proposed development have been identified in this section?*

A: It is agreed that all significant effects arising from the development have been identified.

4) *Do consultees agree on the suitability of the proposed commitments/mitigation measures?*

A: The suitability of the proposed commitments/mitigation measures are acceptable.

2.0 Drainage

- 2.1 The Lead Local Flood Authority (LLFA) welcomes the opportunity to comment on the Humber Hydrogen Transmission System (HHTS) Environmental Impact Assessment Scoping Report.
- 2.2 The LLFA agrees that potential impacts arising from construction activities, including disruption to ordinary watercourses, land drainage systems, floodplain storage, surface water flow routes and water quality, should be fully assessed within the Environmental Statement. The proposed Flood Risk Assessment should consider both fluvial and surface water flood risk and demonstrate that flood risk is not increased on-site or elsewhere throughout construction, operation and decommissioning phases.
- 2.3 The Environmental Statement should provide a detailed assessment of all crossings of ordinary watercourses, drains and Internal Drainage Board (IDB) assets, including temporary and permanent works. Particular consideration should be given to the cumulative impact of multiple crossings and construction compounds on local drainage catchments and flood conveyance.
- 2.4 The LLFA supports the commitment to prepare a Drainage Strategy and requests that this includes temporary construction drainage arrangements, management of runoff from compounds and haul roads, attenuation proposals where required, maintenance access arrangements and measures to ensure no deterioration in existing drainage performance.
- 2.5 The FRA should clearly identify any infrastructure proposed within Flood Zones 2, 3a or 3b and demonstrate compliance with the National Planning Policy Framework and relevant National Policy Statements. The assessment should also consider climate change allowances appropriate to the lifetime of the development.
- 2.6 The LLFA welcomes the proposed use of trenchless techniques in environmentally sensitive locations and supports the inclusion of pollution prevention and emergency response measures.
- 2.7 Note that the above comments are from the Lead Local Flood Authority, any further additional comments received from the Council's Land Drainage Team will be sent over in due course.

3.0 Public Health

- 3.1 The Scoping Report provides a reasonable starting point. The inclusion of a dedicated human health section, consideration of the wider determinants of health, and identification of local vulnerabilities are all welcome. However, a number of areas will need to go further in the Environmental Statement, and these are set out below in order of priority:

1) Communicating risk around hydrogen

- 3.2 Hydrogen pipelines are unfamiliar to most people, and uncertainty about a new technology can cause real anxiety regardless of the actual level of risk. The report does not commit to any clear, accessible communication with communities about how hydrogen will be managed safely, what emergency plans are in place, or how uncertainty will be handled as the project progresses.

Recommendation: The ES should include a specific commitment to proactive, accessible safety communication with communities throughout all project stages.

2) Impact on local health services

- 3.3 The report flags that an incoming construction workforce could put pressure on local GP services and urgent care, but does not take this any further. There is no assessment of what that demand might actually look like, and no evidence that the applicant has engaged with local health service providers.

Recommendation: The ES should include a proportionate screening of workforce demand against local NHS and primary care capacity, with early engagement with health service providers.

3) Pulling the picture together

- 3.4 Health impacts are currently spread across several technical chapters with no single account of what the combined effect on community health looks like. Communities and decision-makers should not have to navigate multiple chapters to understand the overall health picture.

Recommendation: The ES should include a clear, accessible integrated health summary drawing together findings from all relevant topics.

4) Pressure from multiple projects in the Humber area

- 3.5 This project is one of several major developments being progressed in the Humber area simultaneously. Repeated consultations and ongoing uncertainty create a cumulative burden on communities that can affect wellbeing in its own right. This is not currently addressed anywhere in the report.

Recommendation: The applicant should acknowledge this cumulative burden and set out how they will actively reduce it through coordinated and proportionate engagement.

5) Mental health and wellbeing

- 3.6 Mental health is mentioned in places throughout the report but is not treated as something the assessment actively tracks. The applicant's own baseline data shows higher than average rates of depression and low life satisfaction in parts of the study area, yet there is no structured framework for assessing this as an outcome.

Recommendation: Mental health and wellbeing should be assessed explicitly across all project stages, including pre-application and consultation, not just during construction.

6) Health inequalities

- 3.7 The report lists groups who may be more vulnerable but does not explain how overlapping vulnerabilities will be considered or how mitigation will be targeted at those who need it most. Someone who is older, lives in a deprived area, and is close to the construction route faces a very different experience to the average resident.

Recommendation: The ES should set out a structured approach to health inequalities, not just list susceptible groups.

7) Engagement as a health issue, not just a process

- 3.8 The applicant's own report acknowledges that consultation can cause stress and anxiety. Despite this, engagement is treated purely as a procedural step rather than something that

can actively support or undermine wellbeing. There is no targeted outreach to more vulnerable groups and no clear explanation of what communities can and cannot influence.

Recommendation: Engagement should be designed with health in mind and positioned as a primary mitigation measure, not a process requirement.

8) Walking routes and access to green space

- 3.9 Disruption to public rights of way is recognised as a health concern but only in terms of the harm caused. Given higher than average rates of obesity and long-term health conditions locally, maintaining and improving access to walking routes and open space could make a genuine difference to people's health.

Recommendation: The ES should consider access and active travel as a health opportunity, not just a risk to be managed.

9) Wider benefits to the community

- 3.10 The report is largely focused on what might go wrong and how to reduce those impacts. There is limited consideration of how this project could actively benefit local communities through jobs, training, and environmental improvements, particularly in areas that already face higher levels of deprivation.

Recommendation: The ES should set out a clear account of how the development will deliver positive health and social value outcomes for local communities.

4.0 Inward Investment and Business Support

- 4.1 Please find below comments from Economic Development on sections of the Humber Hydrogen Pipeline Environmental Impact Assessment Scoping Report, relevant to our area of work:

- 4.2 *2.8.1.1 Is the definition of the Proposed Development clear and fit for purpose in relation to the scoping of environmental effects undertaken in this Report?*

Yes, the Report provides a clear definition of the Proposed Development, detailing visually, and textually, the expected geographical area it will cover, along with detailed information on the construction, operations and maintenance, and decommissioning elements of the project.

- 4.3 *2.8.1.2 Do consultees agree that the scope of the Proposed Development being assessed in the EIA is clear and appropriate?*

Yes, the scope of the Proposed Development being assessed in the EIA is clear and appropriate, with the Maximum Design Scenario allowing sufficient flexibility to accommodate any necessary refinement. It would be helpful to include information here on the likely number of jobs being created during construction, and during operation and maintenance.

- 4.4 *3.3.1.1 Are consultees satisfied that all relevant overarching legislation, policy and guidance has been identified within this Section (noting that topic specific legislation, policy and guidance are noted within those topic sections)?*

Yes. Consideration may also wish to be given here, or in the socio-economic topics section 6.11.2.1, to the Humber Economic Strategy 2025 to 2035, which identifies clean energy and industrial decarbonisation as a regional opportunity, and the Hull and East Yorkshire Combined Authority Local Growth Plan, which identifies energy as one of the growth driving sectors within its first Big Play, powering our industrial future.

4.5 *6.11.9.1 Do consultees agree with the Study Area that has been identified?*

Yes, the Study Area identified assesses socio-economic, wider socio-economic, and socio-cultural effects at a Neighbourhood level (wards), Local level (local authority), the travel-to-work area of Hull level, and at a National level.

4.6 *6.11.9.2 Do consultees agree that the baseline data sources identified are sufficient to adequately characterise the baseline?*

Yes. Other local data sources which may assist to characterise the baseline include, East Riding Intelligence Hub and East Riding Local Economic Assessment (LEA) Dashboard.

4.7 *6.11.9.3 Do consultees agree that all potentially significant effects that could arise from all stages of the Proposed Development have been identified in this section?*

Yes, all potentially significant effects appear to have been identified in this section.

4.8 *6.11.9.4 Do consultees agree on the suitability of the proposed commitments/ mitigation measures?*

The proposed commitments and mitigation measures seem suitable for this project. Additionally, East Riding of Yorkshire Council's Supply Chain Network project (<https://thesupplychainnetwork.co.uk/>) can support all phases of the Proposed Development.

We ask that it be included in the proposed Socio-Economic Aspects Commitments (Table 6-47). We would encourage The Applicant and their supply chains to engage fully with this resource, signing up to the 'Supply Chain Promise' (<https://thesupplychainnetwork.co.uk/promise/>) and using the 'Opportunity Map' (<https://thesupplychainnetwork.co.uk/opportunities/>) to promote specific opportunities to local businesses.

4.9 *6.14.9.1 Do consultees agree with the Study Area that has been identified?*

Yes, the human health baseline geography mirrors the socio-economic baseline used in 6.11.9.1 and commented on above.

4.10 *6.14.9.2 Do consultees agree that the baseline data sources identified are sufficient to adequately characterise the baseline?*

Yes. Other local data sources which may assist to characterise the baseline include, East Riding Intelligence Hub and East Riding Local Economic Assessment (LEA) Dashboard.

4.11 *6.14.9.3 Do consultees agree that all potentially significant effects that could arise from all stages of the Proposed Development have been identified in this section?*

Yes, all potentially significant effects appear to have been identified in this section.

4.12 *6.14.9.4 Do consultees agree on the suitability of the proposed commitments/ mitigation measures?*

The proposed commitments and mitigation measures seem suitable for this project. The suitability of the proposed commitments/mitigations may also be worthwhile considering in relation to Hull and East Yorkshire Combined Authority's Get Hull & East Yorkshire Working Plan, the organisation's employment and health strategy, and the updated Local Skills Improvement Plan, expected to be published in summer 2026.

5.0 Building Conservation

- 5.1 The proposed construction of the Humber Hydrogen Pipeline has the potential to impact on a wide range of designated heritage assets across the development area covering spanning the landscape of middle and southern Holderness.
- 5.2 As noted in paragraph 6.9.8.1, a multi-staged approach will be undertaken in order to gather sufficient data to allow assessments to be made on the impact of the scheme on the historic environment, beginning with a desk-based assessment (DBA) and walkover, followed by geophysical survey and targeted intrusive evaluations.
- 5.3 It is stated that a Study Area of 250m will be used to inform the heritage baseline, against which potential direct impacts and effects to known and currently unknown heritage assets will be assessed. A 500 m Study Area will take in the Site and land up to 500 m distant from the Site; it is noted that there will be some degree of flexibility with this Study Area to ensure adequacy in the overall assessment. This Study Area will be used to identify potential Settings Effects to designated assets as well as selected non-designated assets identified through consultation with the LPAs surrounding the Site. The historic baseline is summarised within the document submitted, addressing the four pipeline sections and individually identifying the designated heritage assets within the relevant Study Areas.
- 5.4 We are satisfied with the observations for each of the route sections, however further work is required in order that a full assessment of the resultant impact can be made and would expect to see the inclusion of significant non-designated heritage assets. An assessment of the significance of each of the identified heritage assets would be required, followed by an assessment of the expected impact on the significance of the heritage assets. Relevant sources, such as Historic England's National Heritage List for England, the local HER, aerial photographs and historic mapping, together with Ordnance Survey Maps and other applicable online sources should be consulted, as well as being supported by site walkovers and setting appraisal when applicable (and achievable). We note that whilst a substantial proportion of the works would be below ground, the impact of the above ground infrastructure must be adequately addressed (even where temporary). It is therefore recommended that the assessment is informed by the findings of the LVIA. We are generally satisfied with the proposed approach set out within table 6-40.
- 5.5 Whilst the level of harm, relative to the individual designated heritage assets identified has not been adequately assessed at this stage, we would note that any harm identified is a material consideration in the wider planning balance, and so clear and convincing justification must be provided in support of an application. The applicant must also be able to clearly demonstrate the public benefits of the scheme, in line with paragraphs 202, 208 and 212 of the NPPF.
- 5.6 Finally, we note the consultee questions under section 6.9.9 of the Environmental Impact Assessment Scoping Report and have provided answers to these below from a Building Conservation perspective:

1) 6.9.9.1 *Do consultees agree with the Study Area that has been identified?*

We are satisfied with the proposed Study Area for the assessment of designated heritage assets.

2) 6.9.9.2 *Do consultees agree that the baseline data sources identified are sufficient to adequately characterise the baseline?*

We are satisfied that the data sources that have been used to inform this Scoping Report and will be further utilised for the ES are acceptable in this instance.

3) 6.9.9.3 *Do consultees agree that all potentially significant effects that could arise from all stages of the Proposed Development have been identified in this section?*

We agree that the potential effect from each stage of the development has been identified within this Scoping Report.

4) 6.9.9.4 *Do consultees agree on the suitability of the proposed commitments/mitigation measures?*

We are satisfied with the commitments/mitigation measures outlined and note the acknowledgment that the requirement for additional measures will be dependent on the significance of the effects on the historic environment and will be consulted upon with statutory consultees during the EIA process.

5) 6.9.9.5 *Do consultees have any information regarding current or recent archaeological work or projects being undertaken within or in the vicinity of the Site, particularly those whose results may not yet be recorded in the local HER datasets?*

Please see the comments from the Council's Development Management Archaeologist.

6) 6.9.9.6 *Do consultees have details of any cultural heritage sites in the vicinity of the Proposed Development which it considers may raise significant issues within the EIA process for the Proposed Development?*

At this stage, we are unable to confirm any significant issues based purely on the information provided within the Scoping Report. Based on the available information, we anticipate that it is unlikely that there are any sites in the vicinity which may raise significant issues, however, when more data becomes available, this position could change.

6.0 Archaeology

- 6.1 The proposed construction of the Humber Hydrogen Pipeline has the potential to impact on a wide range of different archaeological remains/sites across the landscape of middle and southern Holderness. The archaeological baseline in the Environmental Impact Assessment Scoping Report is sufficient at this stage in providing a brief archaeological background to each of the four pipeline sections and includes both designated and non-designated heritage assets.
- 6.2 As noted in paragraph 6.9.8.1, a multi-staged approach will be undertaken in order to gather sufficient data to allow assessments to be made on the impact of the scheme on the historic environment. This approach should include as a minimum:

- Desk-Based Assessment
- Walkover Survey
- Geophysical Survey
- Geoarchaeological Survey leading to a potential deposit model in specific areas of the scheme.
- Intrusive trial trenching evaluation

6.3 The specific details regarding the above approaches relating to archaeological remains will be discussed and agreed in meetings/correspondence between the East Yorkshire and Hull HER and the developer's archaeological representative. Specific pieces of the assessment will be supported by archaeological written scheme of investigation documents, which will be produced and approved prior to that work commencing.

6.4 I note the consultee questions on p.230 of the Environmental Impact Assessment Scoping Report and have provided answers to these below from an archaeological perspective:

- *6.9.9.1 Do consultees agree with the Study Area that has been identified?*

We are happy with the proposed study area for the assessment of archaeological remains.

- *6.9.9.2 Do consultees agree that the baseline data sources identified are sufficient to adequately characterise the baseline?*

The baseline data sources listed are acceptable; however, the use of Heritage Gateway for gathering supplementary information on the archaeological remains of East Yorkshire is not acceptable due to the information on there being a limited version of the information held by the Historic Environment Record. We would also recommend that data from the Portable Antiquities Scheme is used to compliment other data sources. Data from the National Mapping Projects undertaken by Historic England should also be obtained and included in the assessment.

- *6.9.9.3 Do consultees agree that all potentially significant effects that could arise from all stages of the Proposed Development have been identified in this section?*

We agree that the potential effect from each stage of the development has been identified.

- *6.9.9.4 Do consultees agree on the suitability of the proposed commitments / mitigation measures?*

Whilst we are happy with the proposed commitments/mitigation measures outlined, we would recommend that in the design description, those sites which have been identified in the assessment phase as having remains that can be demonstrated to be of equivalence to designated assets be included as sites to potentially avoid.

- *6.9.9.5 Do consultees have any information regarding current or recent archaeological work or projects being undertaken within or in the vicinity of the Site, particularly those whose results may not yet be recorded in the local HER datasets?*

All recent archaeological work for which the HER has received a report on will be available on request, however there are several large-scale infrastructure schemes currently taking place across East Yorkshire, for which many of the results will not yet be available in HER datasets. A project in the vicinity of the scheme, particularly towards the eastern end, is the Humber Carbon Capture Pipeline. Archaeological work has also taken place on several of

the associated projects, such as Aldbrough Hydrogen Storage and the Hydrogen Production Facility at Easington.

• 6.9.9.6 Do consultees have details of any cultural heritage sites in the vicinity of the Proposed Development which it considers may raise significant issues within the EIA process for the Proposed Development.

This question is currently difficult to answer using the available information provided with the Scoping Report. Therefore, based on the available information, we can state that there are currently no sites in the vicinity which may raise significant issues, however, when more data becomes available, this position could change.

7.0 Environmental Control

- 7.1 Following review of the Environmental Impact Assessment Scoping Report by ERM (dated 21st May 2026, report ref: 0828110. Final) in particular Section 6.3 - Geology & Ground Conditions and Section 6.5 Air Quality, the following comments are made.

Geology & Ground Conditions

- 7.2 I am satisfied with the approach taken. I note within commitment GEO-G that the applicant proposes to access LA data on potentially contaminated land. I would recommend that the applicant contact the team on environmental.control@eastriding.gov.uk and request that data as the Council have identified some 32,000 sites of potentially contaminated land within the Council's administrative area.

Air Quality

- 7.3 I am satisfied with the approach taken by the applicant. Details of the council's air quality monitoring network can be found at <https://www.eastriding.gov.uk/environment/pollution/air-pollution/air-quality-monitoring/> along with copies of the Annual Status Reports (ASR). The latest version of the ASR is due to be published in the next four weeks, if the applicant requires data before the date of publication of that report then please contact the team at environmental.control@eastriding.gov.uk.

Noise and Vibration

- 7.4 Following review of the Humber Hydrogen Pipeline Environmental Impact Assessment Scoping Report (ERM Project No. 0828110 dated 21st May 2026), in particular section 6.6 (Noise and Vibration), it is confirmed that we are satisfied with the scoping proposal.

8.0 Coastal Management

- 8.1 This project has been reviewed and has been considered to have no impact on the East Riding coast, therefore no comments are provided from this team.

9.0 Definitive Map team

- 9.1 The report mentions 35 PROWs will be affected and that these are temporary. Should any of these in any future plans be required to become permanent then it is important that the Definitive Map team is informed as soon as possible.
- 9.2 There are several claims for PROWs that cross or abut the site, these are both Official and unofficial format. However, we cannot ignore any of these claims and in the future could be

added to the Definitive Map, I have included a map showing the claims, however if the applicant wishes more details on these it is advised that they contact the Definitive Map team.



- 9.3 Table 6-49 (Magnitude of Impact) indicates that permanent closures of PROW may occur. It is important that the Definitive Map team are informed of any permanent changes as soon as possible.
- 9.4 It is also important that the PROW and Definitive Map teams have sight of the PROW Management Plan as soon as it is available.
- 10.0 Sustainable Development
- 10.1 The following comments are confined mainly to consideration of the Hull and East Yorkshire LNRs and designated and candidate Local Wildlife Sites identified within East Yorkshire, and more general sustainability considerations in relation to the natural environment within the East Riding of Yorkshire.
- 10.2 The scoping report recognises both the existence of and the requirement to have regard to the LNRs's for both Hull and East Yorkshire and Greater Lincolnshire, as well as the fact that whilst there is no obligation the strategies' plans and recommendations the strategic approaches they have identified – and which they have been widely consulted on in each case.
- 10.3 Because the project will have variety of impacts over an extensive if etiolated area, those responsible for the assessment are encouraged to demonstrate adherence to the mitigation hierarchy in avoiding, minimising and mitigating harm, taking account of existing areas of importance for biodiversity and those which, taking account of what will have

greatest ecological and the practicalities for delivery will best support the nature recovery networks the LNRs are seeking to deliver at large, landscape scale.

- 10.4 Particular care should be taken in respect of water courses and other waterbodies and special attention given to the existing presence of invasive non-native species and measures to prevent their spread or colonisation of new sites and, where relevant to their local elimination. It would be advisable to discuss this with the landowners and to the north of the Humber, the Hull and East Yorkshire Invasive Species Forum.
- 10.5 The post-decommissioning survey and follow up monitoring will be important in this regards as well as in assessing the plans for and outcomes of habitat mitigation and enhancement.
- 10.6 One of the key ways in which the development might yield more positive outcomes for biodiversity, particularly in connection with the LNRs, will be to consider how the project design might buffer and link habitats including between existing sites of high value, or strengthening and enhancing existing links (hedges, ditches, tree lines and water courses) as well as providing better in situ habitat for pollinators and other invertebrates.
- 10.7 Early discussion with the Local Nature Partnerships in both counties is strongly advised, potentially providing a way forwards for other landscape NSIPS as a way of identifying how, as part of their obligations in connection with development, more strategic and sustainable outcomes can be achieved.
- 10.8 For consultation, it is strongly suggested that Water Companies, Local Nature Partnerships and partnership bodies such as Catchment Advisory Boards also be included. These will not only be directly involved income locations but be a source of data and on the ground knowledge too.

Potential Impacts

- 10.9 The scoping document mentions flora and fauna, and examples of both, but it seems to be missing consideration of fungi. This needs to be addressed.
- 10.10 For reptiles, grass snake is the species most likely to be encountered across East Yorkshire, particularly in those areas where amphibians are abundant and along watercourses. It is suggested that any assumption that survey won't be needed may need to be reviewed on a location-by-location basis, for example in areas or corridors that connect more suitable habitat.
- 10.11 Please see the below responses to the biodiversity questions set out at 6.7.9 of the Scoping Report:
 - 1) The study area appears to be correct.
 - 2) No. The document does not refer even once to the National Character Areas which the development will cross, the nature of which are the starting point of the existing differences wrought by land use. This needs to be remedied and due attention needs to be given to fungi and to INNS.
 - 3) No. The risk of INNS transfer will need to be properly addressed.
 - 4) In principle, but it will be more important to assess proposals once the scale, location and extent of impacts is better understood, i.e. it is too early to rule anything out at this stage.

5) This appears appropriate at this stage.

6) In general, but consideration needs to be given to INNS and fungi. Care should be taken with regard to assessment of the need for reptile survey.

7) Yes. However, what is lacking appears to be (a) the potential for additional data to be secured whether from local groups that don't share directly with local data centres or organisations such as the Environment Agency or (b) any plans for data collected in the course of the preparation for the works, the decommission survey or follow-up BNG monitoring to be shared with either data centres, the local nature partnerships or landowners. This should also be remedied

10.12 Whilst there is much to commend as exemplary best practice – subject to how the points above are tackled – we would particularly encourage those involved with the project to think about how, as part of what they are seeking to achieve they could benefit the LNRs where, giving consideration to this in advance would make this practicable, desirable and beneficial all round - and provide a more holistic and even more exemplary model for others to follow.

11.0 Nature Conservation

11.1 *6.7.9.1 Do consultees agree with the Study Area that has been identified?*

Yes, the identified study areas are appropriate.

11.2 *6.7.9.2 Do consultees agree that the baseline data sources identified are sufficient to adequately characterise the baseline?*

Yes

11.3 *6.7.9.3 Do consultees agree that all potentially significant effects that could arise from all stages of the Proposed Development have been identified in this section?*

Invertebrates are missing from the scoping assessment.

11.4 *6.7.9.4 Do consultees agree on the suitability of the proposed commitments / mitigation measures?*

Commitments at Table 6-33 for Ecology and Nature Conservation are broadly suitable.

We would ask that CO20 is revised so that sections of hedgerows and trees which are removed will be replaced using higher distinctiveness hedgerows (i.e. species rich) rather than like-for like.

We would ask that protected species and habitats of principal importance are factored into design stage avoidance measures within CO2 and/or include a commitment to species and habitat protection plans during construction.

A commitment to project-wide biodiversity net gain is encouraged.

Retention of mature trees where possible should be a design stage commitment.

11.5 *6.7.9.5 Are consultees in agreement with the designated sites scoped into the assessment?*

Yes

11.6 6.7.9.6 *Are consultees content with the proposed scope of surveys?*

As detailed above, there is no reference to invertebrates within the scoping report. Habitat assessments should include an assessment of valuable invertebrate habitats acknowledging that the arable dominance of the majority of the study area.

11.7 6.7.9.7 *Are consultees content with the extent of datasets obtained as part of the desk study?*

Yes, data sets used are in line with best practice. The Environment Agency can be approached for relevant fish records. East Yorkshire Bat Group can provide more detailed information on bats within the study area.

Outstanding comments on the Humber Hydrogen Pipeline Scoping Report are still awaited from Land Drainage team, Trees, Countryside Access, Forward Planning and Transport Policy. These will be sent over upon receipt to PINS for forwarding onto the applicant.



Planning Inspectorate

Sent via email:

humberhydrogenpipeline@planninginspectorate.gov.uk

Our ref: OR-0004873/01

Your ref: EN0710006

Date: 19 June 2026

Dear Ms Terry

ENVIRONMENTAL IMPACT ASSESSMENT SCOPING REPORT

HUMBER HYDROGEN PIPELINE

Thank you for consulting the Environment Agency (EA), on the 22 May 2026, to review the Environmental Impact Assessment (EIA) Scoping Report for Humber Hydrogen Pipeline.

We have listed our headline comments below in **Table 1.1**, with detailed [EIA Scoping Comments in Appendix A](#), [Advice to the Applicant in Appendix B](#) and [Informatives for the Applicant in Appendix C](#). We recommend the use of a commitments register to aid further scoping out of topics. We have answered the Applicants consultee questions in Appendix A.

Based on the information submitted, there is a significant risk the development will impact on the aspects and issues below. We therefore request they be scoped in for assessment to ensure they are adequately assessed and mitigated.

Table 1.1 Headline Comments

Aspect	Issue	Developer position	EA position
Flood Risk and Coastal Management	Impacts to flood defences.	Scoped Out.	Scope Into the EIA.
	Off-site flood risk.	Scoped Out.	Scope Into the EIA.
Groundwater and Contaminated Land	WFD Groundwater bodies.	Not Considered.	Scope Into the EIA.
	Accidental spills and contamination risk.	Scoped Out.	Scope Into the EIA.
	Thermal Impacts to groundwater.	Not Considered.	Scope Into the EIA.
	Identification of Landfills.	Not identified.	Scope Into the EIA.
Water Quality	Water Quality Impacts.	Scoped In for Construction.	Scope Into all phases.

Water Resource	Water Supply Strategy.	Not Considered.	Scope Into the EIA.
Cumulative Impacts	Humber Carbon Capture Pipeline.	Details are not discussed.	Request further discussions.

Our advice has been provided under our chargeable service agreement with the Applicant: **ENVPAC/1/NIT/00119**.

Any requests to disapply any permits or consents should be sent to us in writing as soon as possible, to allow us sufficient time for their consideration (minimum 6 months). Sufficient time is required to ensure we can appropriately respond to discharge of requirements and protective provision consultations. Please ensure in your Development Consent Order (DCO) a minimum of 21 days is stipulated as a response time for the discharge of requirements, and a minimum of 61 days for protective provisions.

Please note, this response does not represent our final view in relation to any environmental permit applications made to us. Our final views will be based on all relevant information, including applications and guidance available at the time of submission.

We look forward to continuing to work with you as the detailed proposals continue to develop, and to review and provide advice on relevant supporting documents as these are generated.

Yours sincerely



Planning Specialist

Direct e-mail Nlteam@environment-agency.gov.uk

APPENDIX A – EIA Scoping Report Comments

Our comments in the below appendix outlines our issues we would like to be scoped in for further assessment for the Humber Hydrogen Pipeline Environmental Impact Assessment.

Chapter 6.3 Geology and ground conditions

Groundwater and Contaminated Land

Scoping Request	Scope In: Accidental spills/ leaks from the use of plant/ equipment with pollution potential, waste storage	
Chapters: 6.3 Geology and ground conditions	Issue	The Applicant has not provided enough details to provide us with the confidence to agree to scope out Accidental spills/ leaks from the use of plant/ equipment with pollution potential, waste storage.
Section/ pages/ table reference: Table 6-3, Impact ID: GEO-I and Section 6.4.4.1	Impact	If risks are not adequately assessed and mitigated these may result in pollution of sensitive groundwater receptors including: • The principal aquifer • WFD Groundwater bodies That underlie the majority of the Proposed Development.
	Solution	We request the Applicant Scope In Accidental spills/ leaks from the use of plant/ equipment with pollution potential, waste storage during the construction, Operation and Decommissioning Phases. We request the Applicant ensure this scope includes to grouting and drilling activities explicitly, given activities risk to groundwater receptors.
Additional Comments: We do not consider there to be sufficient evidence to support the Applicant's request to scope out the effects of accidental spills or leaks arising from the use of plant and equipment with pollution potential, or from waste storage activities. At present, there is limited detail regarding the content of the proposed Environmental Management Plans (EMPs), and it is not clear that all necessary plans expected to support the Proposed Development have been adequately identified. Without this information, it is not possible to fully assess the effectiveness of mitigation measures or the potential environmental risks associated with the development. Impacts to groundwater quality during construction should not be scoped out in such a sensitive geological setting. Working at depth would remove much of the attenuating and protective properties of any overlying drift cover, which may be		

present above the principal chalk aquifers. Although, '*standard construction and drilling industry practices will be adopted*', the conditions present may not be standard, should the aquifers be breached and artesian groundwater encountered.

The need to scope this in, is underlined by the Applicant Scoping In: Potential surface water pollution (Table 6-10, issue WAT-A), where presumably the same standard construction and drilling industry practices will be adopted. We consider that further information is necessary to provide reassurance that mitigation measures to manage risks from piling and other deep foundation construction activities, and from trenchless pipeline installation methods, will be mitigated.

Scoped-in matters GEO-F and GEO-G commit the Applicant to assessing impacts associated with trenchless drilling activities, including risks related to physical intrusion and the potential to encounter existing contamination. These activities also present a risk of introducing new pollutants, particularly through the loss of drilling fluids. This is of particular concern where such activities may interact with the underlying Chalk Principal Aquifer, which is known to be sensitive and may contain karstic solution features that increase its vulnerability to pollution.

We therefore require further detail on the proposed assessment methodologies, the specific activities to be undertaken, and the mitigation measures that will be implemented to ensure the protection of this sensitive water receptor.

Section 6.4.4.1 of the report states that the underground pipeline would be decommissioned through the removal of all above-ground infrastructure, with the pipeline retained in situ. The process is described as:

"generally, includes filling road and watercourse crossings with grout and the removal of all hazardous materials from the pipeline, such as gases."

However, the grouting process, if not appropriately controlled, presents a risk of grout loss into the surrounding ground. This is of particular concern where the pipeline intersects the Chalk Principal Aquifer, as the potential presence of karstic solution features could facilitate the migration of grout over considerable distances, potentially impacting sensitive receptors.

Further information is therefore required on the proposed mitigation measures and control procedures to be implemented during decommissioning to prevent uncontrolled grout loss and ensure the protection of groundwater resources.

Scoping Request	Scope In: Thermal Impacts from underground pipelines	
Chapters: 6.3 Geology and ground conditions	Issue	Thermal effects from the underground pipeline during the operational phase have not been assessed.
Section/ pages/ table reference: Table 6-3	Impact	Potential for significant thermal effects to occur to sensitive groundwater receptors, including abstractions and Groundwater Dependent Terrestrial Ecosystems, from the operation of the Proposed Development.
	Solution	The Applicant should assess potential thermal effects to groundwater receptors from the Proposed Development.
Additional Comments: Heat as a groundwater pollutant was introduced in 2023 via the Environmental Permitting (England and Wales) (Amendment) (England) Regulations 2023 SI No.2023/651 : <i>“pollutant”, in relation to England, means any—</i> d. <i>substance,</i> e. <i>heat, or</i> f. <i>biological entity or micro-organism,</i> <i>which is liable to cause pollution;”</i> We are mindful that work is being carried out in this area in relation to heating of groundwater from ground source heating and cooling systems but there is currently no guidance relating to the potential thermal implications of buried pressurised gas transportation pipelines. At this stage we require the potential thermal implications of buried pressurised gas pipelines, in relation to risks to groundwater, to be considered further via desk-based assessment. If we are concerned that there are risks which require ongoing control or management, we may opt to regulate it as a groundwater activity under schedule 22 of the Environmental Permitting Regulations (EPR) 2016. We have no specific guidance relating to the potential thermal implications of buried infrastructure including cables. We suggest that our guidance for ground source heating and cooling systems should be used as a guide. The following link contains relevant information, including thermal plume modelling and an interactive system map and spreadsheet: Environmental impacts of temperature changes from ground source heating and cooling systems - GOV.UK		

Scoping Request	Scope In: WFD Groundwater Bodies	
Chapters:	Issue	Construction Phase impacts on WFD Groundwater Bodies are not assessed.

6.3 Geology and ground conditions		
Section/ pages/ table reference: 6.3.4 and 6.4.4	Impact	Potential for water resource loss through artesian conditions encountered which require dewatering.
	Solution	Construction Phase impacts on WFD Groundwater Bodies should be Scoped In.
Additional Comments:		

Scoping Request	Scope In: Additional Landfills	
Chapters: 6.3 Geology and ground conditions	Issue	The information on landfills within the Study Area is incomplete.
Section/ pages/ table reference: 6.3.3.21, And Figure 6-1	Impact	Potentially significant sources of contamination may be overlooked.
	Solution	We request the Applicant expand the scope of the EIA to ensure that all authorised and historic landfills within the Study Area are identified and assessed. We encourage the Applicant to request information relating to authorised and historic landfills within influencing distance of the Proposed Development from the Environment Agency and Local Authorities respectively.
Additional Comments: The Applicant does not identify the presence of an authorised landfill at Stepney Lane, within the Proposed Development footprint, however this is noted as an 'Environment Agency waste site'. Within the Scoping report the Applicant identifies three historical landfill sites near the settlements of Hollym, Paull and Hedon. Our records show the presence of additional historic landfills within 500m of the Proposed Development: • Crofts Lane landfill (presumed to be the identified landfill near Hollym) • Thorn Road landfill (located near Hedon) • Haven Basin Road landfill (located near Hedon) • Haven landfill (located near Hedon) • Southwest Corner of Cow Hill (presumed to be the identified landfill near Paull) • East Halton landfill (south of proposed Humber Crossing).		

Chapter 6.4 Water resources and Flood Risk

Water Resources

Scoping Request	Scope In: Water Demand	
Chapters: 6.4 Water resources and Flood Risk	Issue	The Environment Agency seeks confidence that a practical and sustainable source of water supply can be established, meeting the consumptive demands for the full life of the project, and not compromise the viability of the scheme.
Section/ pages/ table reference:	Impact	Water supply may not be available from different sources of supply; sources may be restricted or limited as: • Water company supply needs to be confirmed by the Water undertaker. • Tankering should be reflected in traffic and transport estimates. • Groundwater may be closed to new abstractions, as per the abstraction licensing strategy. • Surface water abstraction will be restricted to periods outside of low flows only, as per the abstraction licensing strategy.
	Solution	All water demands of the project should be assessed in the Environmental statement, with all intended options considered for supply water, appraised and water supply issues identified, that detailed design will need to overcome before any permits are applied for. This can be incorporated into the Water Resources and Flood Risk Chapter or, it can be in the form of a separate Water Supply Strategy.
Additional Comments: We agree with the Water Resources elements scoped into assessment regarding the impacts to existing abstractions which should include, water company supply, other licensed abstraction and private (unlicensed) water supplies. However, the scope of the EIA does not consider practical and sustainable sources of water supply for the lifetime of the development. The water demands of the proposal have not been described by the report. These may include (but are not limited to): • Potable/domestic supply to welfare stations • Dust suppression		

- Wheel/machinery wash
- Concrete batching
- Drilling fluids (slurry) for HDD

Quantities of water required for HDD for the Humber crossing may be significant and should be planned for accordingly.

NPS EN-1 (Energy infrastructure) section 5.16.7 states:

The Environmental statement should in particular describe existing water resources affected by the proposed project and the impacts of the proposed project on water resources, noting any relevant existing abstraction rates, proposed new abstraction rates and proposed changes to abstraction rates (including any impact on or use of mains supplies and reference to [Abstraction Licensing Strategies](#)) and also demonstrate how proposals minimise the use of water resources and water consumption in the first instance.

Water Quality

Scoping Request	Scope In: Water Quality Impacts	
Chapters: 6.4 Water resources and Flood Risk Section/ pages/ table reference: 6-10: Likely Effects- Water Resources and Flood Risk	Issue	The Applicant has only scoped In water quality impacts during the construction phase when trenchless pipe laying techniques are used.
	Impact	Not considering water quality within the scope of the EIA accurately, could lead to deterioration of watercourses or damage to water based SSSI's, other designated sites, important habitats or species.
	Solution	Water quality impacts should be scoped in for the entire project to ensure the proposal accurately assess the risks to the water environment.

Additional Comments:

The Applicant must be able to demonstrate the project will not adversely impact the water environment through all development stages. The baseline water quality monitoring is required to demonstrate the current conditions prior to development. The construction phase water quality monitoring demonstrates the development will not impact the water environment throughout the project's development. Operational water quality monitoring ensures the proposals and mitigation measures are adequate, whilst demonstrating the project does not impact the water environment.

The National Policy Statement for Water Resources Infrastructure outlines in paragraph 4.15.5. the applicant should undertake an assessment of the existing status and impacts of the proposed development on water quality, water resources and physical characteristics as part the Environmental Statement.

It is further outlined in paragraph 4.15.6. the Environmental Statement should:

- the existing quality of waters affected by the proposed project
- existing water resources affected by the proposed project and the impacts of the proposed project on water resources
- existing physical characteristics of the water environment (including quantity and dynamics of flow) affected by the proposed project, and any impact of physical modifications to these characteristics
- reference any impacts of the proposed project on water bodies or protected areas under the Water Framework Directive Regulations including groundwater resources, bathing or coastal waters
- the likely range of impacts on existing water quality, resources, physical characteristics of the water environment and waterbodies or protected areas due to climate change
- any cumulative effects

Flood Risk

Scoping Request		Impacts to Flood Defences
Chapters: 6.4 Water resources and Flood Risk	Issue	The EIA has not considered the proposals impacts on flood defences and their level of protection for all development phases.
	Impact	Flood defences may become damaged and the risk of a breach event occurring may increase.
Section/ pages/ table reference: Table 6.10	Solution	The Applicant should Scope In the impacts to flood defences into the EIA. This will ensure the development appropriately considers the impacts to flood defences and provide the necessary mitigations.
Additional Comments:		

Scoping Request		Assessment of all off-site flood risk
Chapters: 6.4 Water resources and Flood Risk	Issue	The applicant has not included the wider floodplain within the scope of the EIA for the operation phase.
	Impact	This may lead to increases in off-site and upstream flood risk, as they are not assessed or compensated for.
Section/ pages/ table reference: Table 6.10	Solution	The Applicant should include off-site flood risk both upstream and downstream of the proposal into Scope of the EIA.

		This may need to include an assessment of flow routes and possible blockers causing backup of flow.
Additional Comments:		

Consultee Questions Response

EIA Methodology

5.12.1.1 Do consultees agree with the general strategy for assessing effects?

In general, yes. However, we have raised concerns regarding the significance matrix used for the geology and ground conditions chapter to ensure there is enough categories to ensure a robust assessment of the significance.

5.12.1.2 Can the consultees provide any further information on developments that they think should be included in the cumulative effects assessment?

As identified within the EIA chapter, the Humber Carbon Capture Pipeline has been included within the scope of the assessment. Whilst the projects are separate, they are being progressed with similar design principles and overlapping red line boundaries. As further detail emerges, we expect overlap in environmental receptors and associated impacts.

The design approaches for the Humber crossing are broadly comparable. There is potential for the cumulative effects of both crossings to result in significant impacts on the Humber. Whilst each project may assess effects independently and conclude they are negligible, the combined effects may be significant. We therefore expect cumulative impacts to be robustly assessed across all phases for the following topics:

- Geology and Ground Conditions
- Water Resources (including water quality)
- Flood Risk
- Ecology and Nature Conservation

The Humber crossing technique has not yet been defined for either project. In the absence of this information, we are not satisfied that environmental risks have been minimised. The Applicant should demonstrate that all reasonable opportunities to reduce impacts have been explored, including the potential for shared tunnelling infrastructure where feasible.

To ensure an adequate assessment of cumulative effects, we expect the Applicant to engage proactively with the Humber Carbon Capture project team. This must ensure that cumulative impacts are fully characterised, and that appropriate and coordinated mitigation measures are identified and secured to minimise environmental harm.

We would like to discuss this matter in further detail with the Applicant and look forward to engaging with them.

Geology and Ground Conditions

6.3.9.1 Do consultees agree with the Study Area that has been identified?

No. Chapter 6 Section 6.4.1.2 states that potential likely significant effects on groundwater are assessed within the geology and ground conditions chapter, which adopts a 500m study area search buffer. This is not sufficient to assess risks to groundwater receptors.

6.3.9.2 Do consultees agree that the baseline data sources identified are sufficient to adequately characterise the baseline?

Yes, at this preliminary stage. However, we note not all relevant features have been identified from the information sources – the presence of an authorised landfill site within the draft Order Limits area has not been identified or discussed. A Desk Based Assessment has not been provided at the current stage but is identified in 6.3.8.1 to be provided in support of the ES. Section 6.3.8.2 states that this will be supported by an environmental search report (e.g. Landmark Envirocheck report) and possibly a targeted walkover survey. Section 6.3.8.5 also states that consultation will be carried out as necessary with ERYC and other statutory bodies regarding contaminated sites, groundwater abstractions, MSAs, RIGS and LGS. We consider the Applicant should ensure they carry out walkover surveys, in particular due to the presence of several areas with the potential for historic contamination within the Study Area.

6.3.9.3 Do consultees agree that all potentially significant effects that could arise from all stages of the Proposed Development have been identified in this section?

No. Effects from heat have not been considered, and decommissioning effects e.g. from grouting activities have not been assessed.

6.3.9.4 Do consultees agree on the suitability of the proposed commitments / mitigation measures?

No. Further assessment and mitigation measures may be required. See advisory comments.

Water Resources and Flood Risk

6.4.9.1 Do consultees agree with the Study Area that has been identified?

We are satisfied with the approach the applicant has taken as this follows the standard approach across NSIPs.

6.4.9.2 Do consultees agree that the baseline data sources identified are sufficient to adequately characterise the baseline?

We are partially satisfied the applicant has identified the necessary data sources however we would recommend looking at the EA's Asset management mapping to gain a baseline of flood defences the proposed development may interact with.

Link -[Asset Information and Maintenance Programme](#)

6.4.9.3 Do consultees agree that all potentially significant effects that could arise from all stages of the Proposed Development have been identified in this section?

Flood Risk

We are generally happy with the assessment of potential effects of the development. However, as highlighted in comments made about scope, we would expect the applicant to identify the effects the development may have on flood defences.

Water Quality

No, the projects impact to water quality are widespread across the project and not limited to the construction phase trenchless techniques. For example:

- open cut watercourse crossings
- Spills and leaks etc
- Concrete
- Wheel washing
- Firefighting

Further details can be found in **Appendix B Advice to the Applicant**.

6.4.9.4 Do consultees agree on the suitability of the proposed commitments / mitigation measures?

No. Further assessment and mitigation measures may be required. See advisory comments.

Flood Risk

Currently the proposed commitments and mitigation measures are very general and will need to be refined with additional detail as the project develops. We would expect to see details of flood mitigation to be detailed in the FRA and for the construction phase the CEMP. We would like to highlight our best practice bridge design criteria as we would expect any new above ground watercourse crossing to follow these criteria.

We require:

- Soffit height of the bridge must be a minimum of 600mm above the 1 in 100yrs flood level for temporary crossings. Permanent crossings will need to include an allowance for Climate change flood level.
- All abutments must be set back a minimum 1m from the top of bank and as minimal as possible
- Any loss of floodplain due to abutments and ramps will need to be compensated for. If necessary, compensation must be provided outside of the 1 in 100yrs +Climate Change allowance flood extent.
- All parapets and railings need to be permeable and open as possible with a minimum 100mm spacing.

Ecology and Nature Conservation

6.7.9.1 Do consultees agree with the Study Area that has been identified?

Yes.

6.7.9.2 Do consultees agree that the baseline data sources identified are sufficient to adequately characterise the baseline?

Fish

The desk study must include freely available EA fish population survey data, which is available here - [EA Ecology & Fish Data Explorer](#)

6.7.9.3 Do consultees agree that all potentially significant effects that could arise from all stages of the Proposed Development have been identified in this section?

No. Further assessment and mitigation measures may be required

6.7.9.4 Do consultees agree on the suitability of the proposed commitments / mitigation measures?

No. Further assessment and mitigation measures may be required. See advisory comments.

6.7.9.5 Are consultees in agreement with the designated sites scoped into the assessment?

Geomorphology

Coastal erosion has not been identified in the EIA scoping. The Easington site is located on one of the fastest eroding coasts in the UK. The project team should assess the risks posed by coastal erosion, taking into account the current Shoreline Management Plan, defence asset condition, and predicted rates of erosion, and incorporate appropriate mitigation and adaptation measures into the design as appropriate.

Flood Risk and Biodiversity

Paul Holmes Strays habitat site has not been identified as key habitat of importance.

6.7.9.6 Are consultees content with the proposed scope of surveys?

Fish

Baseline data should be obtained through a desk study (including EA fish population data) and field surveys, particularly where in-channel works are proposed. Impact-pathways should be identified and assessed in the EIA, which should include (but not limited to):

- impacts from noise and vibration associated with construction
- impacts from pollution and increased sedimentation
- impacts from open cut crossing of watercourses and potential loss or damage to habitat

- impacts from light pollution on watercourses and aquatic ecology

6.7.9.7 Are consultees content with the extent of datasets obtained as part of the desk study?

Fish

The desk study must include freely available EA fish population survey data, which is available here - [EA Ecology & Fish Data Explorer](#)

APPENDIX B - Advice to Applicant

Below we provide the Applicant with the following advice that should be considered as the projects proposals develop further. The advice given identifies the current proposals risks to the environment, our concerns and our appropriate guidance to de-risk the project.

Chapter 2. Proposed Development

Groundwater Contaminated Land

Advice to Applicant		
Chapter ref: 2.4.3	Issue	Indicative design parameters do not include pipeline installation depths or proposed foundation types or depths.
	Impact	The potential depth at which construction related impacts may occur are not clear.
	Solution	The applicant should provide Maximum Design Scenario indicative depths for trench and trenchless installation methods and pile and other foundation design.
Additional Comments: Section 2.4.3 indicates that both crossing options under consideration (Tunnel Boring Machine or Horizontal Directional Drilling) would extend for approximately 5km and pass at least 10m below the true bed of the Humber. No details are provided for tunnel shaft or launch and reception pit dimensions. Deep foundation, piling and ground improvement methods may create preferential pathways or otherwise result in the mobilisation of contamination or alter groundwater flow paths if not adequately mitigated. Table 6-3 Item GEO-G discusses where potentially mobile contamination is identified, we encourage the Applicant to commit to installing impermeable lining to the pipeline trench and to install low permeability stanks/plugs to prevent the pipeline trench from acting as a preferential pathway for mobile contamination. The Applicant should also avoid the pipeline trench from creating a new preferential pathway enabling the mixing of groundwater bodies. Piling and penetrative ground improvement methods should be designed in accordance with CL:AIRE guidance 'Piling and Penetrative Ground Improvement Methods on Land Affected by Contamination: Guidance on Pollution Prevention', published March 2025.		

Advice to Applicant		
Chapter ref: 2.5.2.8, 2.5.2.35, 2.5.2.71, 2.5.2.74, Table 6-3	Issue	The report does not mention dewatering being a licensable activity.
	Impact	Dewatering may require a Water Resources Abstraction Licence.
	Solution	The Applicant is advised to make early engagement with our National Permitting Service.
Additional Comments: Item GEO-E has Scoped In effects from dewatering of trenches and excavations during construction. Specific receptors are not identified in the table. This should include consideration of effects on designated and potential GWDTEs. This item includes the requirement for a detailed hydrogeological assessment – we would welcome the opportunity to be consulted on this. We advise early consideration should be given to this, so that permitting timescales can be built into the development programme so as not to cause delays. The requirement for a Water Resources Abstraction Licence applies unless the activity is exempt under The Water Abstraction and Impounding (Exemptions) Regulations 2017 or RPS 368. The developer should determine the need for an abstraction licence at an early stage. The applicant is advised to contact the Environment Agency on 03708 506 506 for further advice and to discuss the issues likely to be raised or utilise our pre-application advice service. We recommend the developer should follow the Hydrological Impact Appraisal for dewatering abstractions guidance. The proposed development may require: • a groundwater investigation consent (section 32/3 of the Water Resources Act 1991) to construct and test pump; and • a full abstraction licence (Water Resources Act 1991) if the volume of groundwater abstracted is greater than 20 m³/day and abstraction will occur for longer than a period of six consecutive months. Further guidance can be found at: https://www.gov.uk/guidance/water-management-abstract-or-impound-water#abstractions-that-need-a-licence. There may be a requirement for an associated EPR permit to discharge unless an exemption applies; this should also be considered at an early stage.		

Advice to Applicant		
Chapter ref: 2.5.2.40 and 2.5.2.42	Issue	State the pipelines will undergo cleaning and testing the pipelines which would use “a local water source, agreed and permitted by the Environment Agency”.
	Impact	There is currently little water available for consumptive abstraction, and a sufficient supply of water abstraction may not be locally available.
	Solution	We recommend the applicant considers the sources of water available for the construction and operation of this development.
Additional Comments: The relevant Abstraction Licensing Strategies for the route should be reviewed and referenced: (https://www.gov.uk/government/collections/water-abstraction-licensing-strategies-cams-process). As detailed in the Abstraction Licensing Strategies, where there is no water available for abstraction, there may be the opportunity for trading with other users in the same catchment. More information is available at https://www.gov.uk/guidance/water-management-apply-for-a-water-abstraction-or-impoundment-licence#trading-abstraction-rights . Temporary storage for the management of potentially contaminated water removed from the pipeline should be preferentially located in areas of low groundwater sensitivity where practicable.		

Water Quality

Advice to Applicant		
Chapter ref: 2.5.2.3 and 2.5.2.4	Issue	Surveying and clearing of the site, including storage of soils should include installation of temporary drainage and silt fencing.
	Impact	If temporary drainage is not set up but the site is cleared and vegetation is stripped, there is a risk of silt laden water being discharged to nearby watercourses in contaminated areas. Possible discharge of contaminated water to controlled waters could result in a pollution incident.
	Solution	The applicant should plan to include temporary drainage and silt management in the site preparation. Whilst providing sufficient temporary

		working widths to allow for drainage and silt protection.
Additional Comments:		

Advice to Applicant		
Chapter ref: 2.5.2.8	Issue	Details should also include protecting watercourses and not allowing uncontrolled runoff in the reasons for setting up new drainage.
	Impact	If untreated construction site drainage was to reach the watercourse it could cause a pollution incident from silt, or in contaminated areas chemicals entering the watercourse.
	Solution	The applicant should consider how protecting watercourses from uncontrolled discharges is important.
Additional Comments: Any discharge of construction site drainage or groundwater may require a EPR permit.		

Advice to Applicant		
Chapter ref: 2.5.2.1	Issue	When siting construction compounds, the applicant should consider where sewage derived from the compounds will be discharged.
	Impact	It could lead to the pollution of controlled waters.
	Solution	We recommend the applicant considers where potential discharges of sewage effluent could be, considering the space required for the treatment system and discharge route. If the discharge is not to sewer, a permit may be required before any discharge can take place.
Additional Comments: The number and locations of temporary construction compounds is not currently specified. The applicant should avoid siting these on or near sensitive, controlled water receptors.		

Advice to Applicant		
Chapter ref: 2.5.2.35	Issue	Dewatering of the pipe trench and excavation and discharge of water may require an EPR permit.

	Impact	This could lead to the pollution of controlled waters.
	Solution	We recommend early consultation with us to see if a permit application for discharge of construction site drainage is required.

Additional Comments:

If a proper assessment of construction site drainage discharges is not undertaken, the release of silty or contaminated rainwater runoff could result in pollution incidents. Additionally, groundwater, even where it is of naturally occurring quality, may have a detrimental impact on surface waters and has the potential to cause pollution.

Advice to Applicant

Chapter ref: 2.5.2.62	Issue	Where trenchless crossing installation methods are discussed, it needs to be clear what drilling fluids, lubricants and additives will be used, and this should be considered as part of the EIA.
	Impact	If any drilling fluids, lubricants and additives were discharged without a permit and assessment they might be liable to pollute controlled waters
	Solution	The applicant needs to: • Be clear what drilling fluids, lubricants and additives are being used and their potential for carry over in any discharge. • The impacts that would have on the waterbody need to be assessed. We would welcome further discussions to establish if a permit is required.

Additional Comments:

If any of these will form part of a construction site discharge, then it will require an assessment for the suitability to discharge to the relevant environment. If discharge to ground or watercourse was required an EPR permit would likely be required.

Geomorphology

Advice to Applicant

Chapter ref: 2.7	Issue	We note the intention to leave any underground infrastructure in situ following project end-of-life. However, no allowance has been made for the potential situation of pipeline exposure should watercourses change position laterally or
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		vertically, nor for any effects of increased erosion at the coast due to climatic change driven sea-level rise.
	Impact	Not acknowledging the potential for pipeline exposure after project end-of-life has the potential to damage the environment. This includes the water environment should climatic events lead to increased fluvial energy, incision of river channels and lateral movement of said channels across floodplains.
	Solution	Following the polluter pays principle, ensure that contingency plans are in place to manage consequences of potential pipeline (and associated underground infrastructure) exposure, either due to lateral and/or vertical channel movement (terrestrial/fluvial) or because of coastal erosion. This could include making the pipeline easier to decommission/retrieve/recycle at the design stage.

Additional Comments:

Whilst due to the lowland nature of most of the cable route, it is unlikely that pipelines will become exposed by fluvial action, however it is possible. As does the potential for exposure due to coastal erosion, especially the site at Easington, which is located on one of the fastest eroding coasts in the UK.

Additional Geomorphology advice to the applicant

The applicant should provide further assessment to the impacts of geomorphology, as the potential impacts of geomorphic processes, enhanced by climatic change, have been left un-investigated.

Rivers move laterally and vertically in time and space. The courses of rivers change, energy levels and therefore erosive power can fluctuate, and the coast continues to erode. These effects may not be seen immediately, but lack of consideration of natural processes may lead to detrimental effects to the natural environment, even after the project has reached the end-of-life stage.

We are pleased to see that it is intended for pipelines to cross main rivers and other significant watercourses via trenchless means. For completeness, please see below for some general considerations regarding water course crossings (including those for access) and watercourse sensitivity.

General considerations

The following are general guiding principles to consider when designing watercourse crossings to avoid negatively affecting geomorphology and natural processes:

- Avoid unnecessary interference with natural processes. For instance, encourage use of trenchless techniques such as Horizontal Directional Drilling (HDD) to minimise the likelihood of cables entering the water environment.
- Ensure watercourse crossing design is informed by assessment of fluvial processes and geomorphology. For example, depth of HDD crossing should consider the likelihood of vertical channel change.
- Avoid designs which present legacy risks to natural processes and geomorphology beyond the project lifespan. For example, infrastructure such as access tunnels which are left in-situ after decommissioning could be exposed by future coastal erosion or river movement, becoming an impediment to natural processes.
- Consider opportunities to deliver WFD mitigation measures/BNG uplift as part of the design.
- Avoid preventing delivery of mitigation measures, e.g. avoid bringing cables to surface level in floodplains earmarked for future river restoration or flood defence works (including construction of bypass channels).

Notes:

- I. WFD applies to all surface waterbodies, not just those designated for monitoring purposes.
- II. Small watercourses and WFD - watercourses with a catchment less than 10km² connected to a downstream WFD waterbody take the classification of that waterbody.
- III. BNG guidelines indicate that structures built within 10 m of the bank top of a watercourse qualify as encroachment, which may affect the uplift score calculated using the BNG Watercourse metric.

[BNG guidance is mentioned here because our [EA] usual easement for structures, operations, launch pits is to be at least 8m away from the watercourse bank or landward base of fluvial defence structure/embankment (16m if defence structure is for tidal purposes). As stated in the note above, BNG watercourse metric considers anything within 10m of banktop to be encroaching on the watercourse.]

- Any potential construction, operational, and decommissioning phase impacts that the proposed scheme may have on the river must be subject to a WFD Assessment to the satisfaction of the EA.
- Any infrastructural developments on river/floodplain environments should be designed and delivered to have a minimal impact on natural river dynamics (e.g. erosion, deposition, meander migration etc.) and should not place any significant limitations on future river restoration projects.
- Geomorphologically dynamic behaviour is deemed likely to intensify in the next decades in line with Flood Estimation Handbook (Flood Estimation Handbook (FEH) | UK Centre for Ecology & Hydrology (ceh.ac.uk)). Therefore, any infrastructure developments should also take some account of the

likelihood for increased lateral and vertical river dynamics anticipated to result from continued hydro-climatic intensification (e.g. 'a flood-rich epoch') over the remainder of the 21st century (i.e., future proofed designs that are not just based on present-day baseline geomorphological configuration/behaviour).

- If river crossings (bridges, culverts, and buried cables) are required as part of the development, we [EA] would expect to see geomorphologically robust designs that will cause minimal impacts on natural fluvial processes operating in the river/floodplain environment over the course of the 21st century.

Further guidance regarding river crossings can be found in the following document:

[River crossings – good practice guide](#)

Water course sensitivity

- Care should be taken by applicants when determining watercourse sensitivity, especially the use of Q95 scores. Rivers with a higher Q95 flow are not more sensitive than rivers with a lower Q95. In the case of water quality, the reverse of this is true, with less dilution meaning a higher sensitivity to change. Some watercourses with low Q95 may also be winterbournes, and therefore cannot accommodate change easily, as they would be dry for most of the year.
- WFD designation is a method of monitoring and classifying the ecological health of the water environment and not an indication of greater or lesser sensitivity to change. Therefore, watercourses with a WFD designation are no more sensitive than those which have not been designated.

Sensitivity to change cannot be determined from a desk study alone. When determining the sensitivity of a watercourse, the applicant should ensure that professional judgement and the results of any surveys are also incorporated into the assessment.

Biodiversity

Advice to Applicant		
Chapter ref: 2.4.2.3 and 2.4.2.	Issue	The scheme is a linear project, involving the installation of pipelines and cables via trenching.
	Impact	Compounds and trenches associated with cable and pipeline installation present a risk of entrapment of mammals such as otters.
	Solution	Cover-over open trenches to prevent wildlife from falling in and place a ramp to enable wildlife to escape. Securely fence compounds and trenches during construction.
Additional Comments:		

Where possible, trenches should be excavated and closed in the same day to prevent any wildlife becoming trapped. Any open pipework should be capped overnight. All open trenches and pipework should be inspected at the start of each working day to ensure no animal is trapped.

Advice to Applicant

Chapter ref: 2.5.1.2	Issue	Pre-construction surveys have not been included.
	Impact	Changes in the baseline of species presence and distribution. This may result damage or destruction of holts or disturbance during construction, which are offences under the Conservation of Habitats and Species Regulations 2017 (as amended).
	Solution	Pre-construction checks/surveys should be conducted prior to construction, to determine any changes in presence or distribution of species. Pre-construction checks should especially be undertaken at watercourse crossing points, even if no places of shelter (e.g. otter holts or water vole burrows) have been found.

Additional Comments:

Construction will take approximately 36 months in total, including the Humber Estuary crossing. However, there appears to be no mention of repeat surveys prior to construction. CIEEM's Advice Note 'On the lifespan of ecological reports & surveys' states that species survey data may be out of date around 12-18 months following a survey. For example, otters are highly transitory species, therefore an otter could construct a holt prior to or during construction.

The development should also consider potential enhancement opportunities within the design. For example, potential enhancement may include habitat improvements or enhancing connectivity of the riverine corridor through the development.

Advice to Applicant

Chapter ref: 2.5.2.53	Issue	Culverting will be used to cross smaller watercourses.
	Impact	Culverts have the potential to fragment habitats and reduces connectivity, making dispersal and commuting for some species difficult. Culverts also put an added pressure on otters during periods of high water-levels, as culverts offer little

		room for conveyance and put otters at risk of being killed when crossing roads.
	Solution	Should any access tracks cross watercourses or ditches, we would expect to see open-span bridge design. There may be potential for existing watercourse crossing points to be improved for ecology. For example, removal of a culvert and replacing with an open span bridge.

Additional Comments:

However, for the purpose of practicality, we may agree to the culverting of ditches that are proven to be of poor ecological quality (e.g. ditches are dry for most of the year).

If culverting is necessary, then we would recommend a box culvert that is as short as possible. The culvert should have a mammal ledge with ramps incorporated into the design, to ensure connectivity of riparian habitat by allowing otter to pass watercourse crossings.

Chapter 3 Planning and Policy Context

Biodiversity

Advice to Applicant		
Chapter ref: 3.1.8.1	Issue	The applicant is awaiting further information from Government on how BNG will be applied to hydrogen pipelines and NSIPs'. This has now been clarified.
	Impact	Upcoming legal obligation.
	Solution	The final Biodiversity Net Gain statements have been formally laid in Parliament. These statements are central to applying BNG to the NSIP regime and accompany the two statutory instruments in May. These are available here: Biodiversity gain statements. Together, the secondary legislation and gain statements formally confirm the implementation date of 2 November 2026, giving developers certainty of the mandatory requirement.
Additional Comments: The gain statements set out how to calculate, deliver, and report on BNG providing clarity for developers and decision-makers, ensuring that major infrastructure projects leave biodiversity in a measurably better state than before development.		

Chapter 4 Design Approach

Groundwater and Contaminated Land

Advice to Applicant		
Chapter ref: 4.3	Issue	Potential for karst features to be encountered, particularly of concern at Humber Crossing.
	Impact	If not adequately assessed and mitigated, trenchless crossing methods may directly or indirectly introduce pollutants into sensitive groundwater bodies and create preferential flow pathways, leading to the mixing of discrete groundwater bodies. Insufficient mitigation could also cause or exacerbate saline intrusion within the Chalk aquifer.
	Solution	The applicant should commit to producing a crossing specific Hydrogeological Risk Assessments, including Water Features Surveys as applicable, for all trenchless crossings within influencing distance of sensitive, controlled water receptors, and manage risks of exacerbating saline intrusion. The applicant should also produce a drilling fluid breakout plan to mitigate risks associated with drilling fluids. These should be secured under the CEMP and informed by ground investigation data. The applicant should ensure that an appropriate monitoring and mitigation strategy is produced to identify and manage saline intrusion risks resulting from construction activities.
Additional Comments: The poor Quantitative Saline Intrusion status is mainly due to historic groundwater abstraction in the last century in and around the margins of the city of Hull. This caused saline rich estuarine waters to be drawn into the chalk underneath the city, and it has remained relatively static ever since. Whilst this means there is restricted water available for abstraction in and around the city, we would still have concerns over any proposal to abstract from the chalk in close proximity to the estuary or the coastline, so as not to exacerbate the Poor Groundwater Body status further. This will be a pertinent consideration for the development given the proposed pipeline construction under the River Humber, and associated works.		

The potential for bentonite breakout is identified as Impact ID WAT-C in Table 6-10, however only in the context of impacts to surface water bodies. This also could pose a potentially significant risk to groundwater quality.

If an infiltration drainage solution is proposed for any surface water management this could result in the exacerbation or creation of dissolution features if directed into Chalk bedrock. The design of any infiltration drainage should account for this risk.

Chapter 5 EIA Methodology

Advice to Applicant		
Chapter ref: 5.5	Issue	The list of assessments and management plans that will be included in the DCO application is not complete. We acknowledge that the Scheme is at the early design stage.
	Impact	Risks to controlled waters from activities that are not controlled by suitable management plans.
	Solution	Ensure the Environmental Statement is supported by a full suite of outline management plans. See detail below.
Additional Comments: The applicant should consider including: • Construction Surface Water Management Plan • Drainage Strategy – including pollution prevention measures • Outline Construction Environmental Management Plan • Outline Operational Environmental Management Plan • Outline Decommissioning Environmental Management Plan • Foundation Works Risk Assessment		

Chapter 6.3 Geology and Ground Conditions

Groundwater and Contaminated Land

Advice to Applicant		
Chapter ref: 6.13	Issue	Potential for artesian conditions to be encountered during construction activities.
	Impact	Potential for significant loss of water resources or flooding to occur.
	Solution	The applicant should consider the potential for artesian conditions to be encountered and identify mitigation measures in this event.
Additional Comments: There appears to be no recognition within the Scoping Report of the potential for artesian groundwater at all. A hydrogeological impact assessment should be undertaken to fully characterise the likely conditions, risks and mitigation options at the proposed depths of working. We would welcome the opportunity to be consulted on this.		

Advice to Applicant		
Chapter ref: Table 6-1 And 6.4.1.2	Issue	The Study Area for geology and ground conditions has been established at 500m.
	Impact	Effects from the proposed development to sensitive hydrogeological receptors may occur over greater distances.
	Solution	The applicant should adopt a larger study area to identify potential hydrogeological receptors.
Additional Comments: The adoption of a 500m search buffer for potential sources of contamination is appropriate. However, effects from the scheme to groundwater could potentially impact groundwater over a significantly greater distance, particularly in Chalk aquifers in which fracture-dominant flows can be rapid and extensive. Furthermore, the proposed development is within an area which may contain karst solution features, which may result in impacts to groundwater quality and flow patterns extending further than similar geology would typically enable.		

Advice to Applicant		
Chapter ref: 6.3.3.11	Issue	Two geological units present within the study area have not been identified.
	Impact	The geological and hydrogeological setting information provided is incomplete.

	Solution	The applicant should include all geological strata present within the study area.
Additional Comments: The report does not identify the presence of localised superficial Lacustrine deposits (Secondary B aquifer) or Kelsey Hill Gravel (Secondary A aquifer) within the proposed development. We acknowledge that these are not shown to be laterally extensive.		

Advice to Applicant		
Chapter ref: 6.3.3.19 and Figure 6-1	Issue	Information on groundwater abstractions is inaccurate.
	Impact	Impacts to groundwater abstractions may not be identified.
	Solution	The applicant should ensure that all licensed and unlicensed groundwater abstractions within the study area are identified and assessed. This should include engagement with East Riding of Yorkshire Council, North Lincolnshire Council and the Environment Agency, and a review of historic mapping and British Geological Survey well and borehole records.
Additional Comments: Section 6.3.3.9 identifies one licensed groundwater abstraction within the Study Area, stated to be shown in Figure 6 of the report. No Figure 6 is presented, and the figures linked with Section 6.3 (geology and ground conditions) do not provide this information. Our records show several abstraction licenses within 2km of the proposed development footprint, including three records at a single location within the proposed development footprint near Preston, for general agriculture use. This should be considered as a high sensitivity receptor as the abstracted water may be used for food production purposes. Note that private, unlicensed abstractions should be considered in addition to licensed abstractions, and although not mapped these have a default 50m Source Protection Zone 1 applied.		

Advice to Applicant		
Chapter ref: Table 6-4	Issue	The table does not list groundwater abstractions or Groundwater Dependent Terrestrial

		Ecosystems (GWDTEs) as potential receptors, and groundwater sensitivity categories lack detail.
	Impact	No sensitivity categories are provided for groundwater abstractions and GWDTEs, limiting the capacity for impacts to these to be assessed. Groundwater aquifer productivity categorisation is of limited detail.
	Solution	The applicant should determine sensitivity categories for GWDTEs and abstractions and reassess aquifer sensitivity categories.

Additional Comments:

We suggest that aquifer sensitivity categorisation should take account of aquifer designations (e.g. Principal aquifer). Table 6-11 sets out sensitivity criteria for groundwater receptors, including Source Protection Zone status, aquifer designation and abstraction details, over a broader range of sensitivity categories than that outlined in Table 6-4, despite groundwater being excluded from assessment in Section 6.4.

Advice to Applicant

Chapter ref: Table 6-11	Issue	Effects to groundwater are assessed within Section 6.3 of the report, however Table 6-11 sets out sensitivity criteria for groundwater receptors and information on wells and groundwater Source Protection Zones is given in Section 6.4.3.34 and 6.4.3.35
	Impact	No sensitivity categories are provided for groundwater abstractions and GWDTEs, limiting the capacity for impacts to these to be assessed. Groundwater aquifer productivity categorisation is of limited detail.
	Solution	The applicant should determine sensitivity categories for GWDTEs and abstractions and reassess aquifer sensitivity categories.

Additional Comments:

We suggest that aquifer sensitivity categorisation should take account of aquifer designations (e.g. Principal aquifer).

Advice to Applicant

Chapter ref: Table 6-6	Issue	The significance of effect matrix used in Section 6.3 is of limited value.
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	Impact	Potentially significant effects may be discounted due to the resolution of the significance of effect matrix.
	Solution	The applicant should review the significance of effect matrix and ensure there are enough of sensitivity and magnitude of impact categories to enable robust assessment of significance.
Additional Comments: Due to the limitations of the matrix (three sensitivity categories – high, medium, low and four magnitude categories – large, medium, small, negligible) it is possible for a single category change to result in a multiple-category significance change. For example, changing a small magnitude impact to a High sensitivity receptor to a lower magnitude category results in a change from ‘Moderate adverse (significant)’ to ‘Not significant’ with no intermediate ‘minor adverse’ effect. In comparison, Table 6-13, applicable to Section 6.4, uses a matrix with four categories for magnitude and sensitivity.		

Advice to Applicant		
Chapter ref: 6.3.3.21 and 8.10	Issue	The applicant reports several historic landfill sites within the Study Area as a potential source of contamination. Details of the wastes received at these sites and any containment systems are not provided.
	Impact	There is a potential for landfill related contamination to be underestimated, and potential for significant constraints to development if the risks are not properly assessed. This could include damage to gas and leachate collection systems and landfill liners. Potential for excavations outside areas of landfilling to be impacted by migration of hazardous ground gases and leachate.
	Solution	The applicant should further assess all identified active and historic landfill sites in subsequent stages of the application process. In particular, the applicant should consider whether the Proposed Development has the potential to damage the integrity of existing landfills and/or encounter historic contamination or wastes associated with these features. For example, this could occur via open trenches through the landfill or drilling at an insufficient depth beneath the landfill.

		The applicant should avoid damaging landfill infrastructure. If this is unavoidable, they should ensure that new monitoring infrastructure such as perimeter monitoring wells are installed before the existing infrastructure is damaged or removed. Any repairs to infrastructure must be done under CQA. The applicant should also note that any material excavated from a landfill cannot be replaced in-situ. It must be handled as waste and would need to be disposed appropriately off-site. An informative about closed landfill sites is provided at the end of this response. Produce a waste management plan that sets out how waste material will be handled. This should be supported but a hydrogeological risk assessment. Ensure that all necessary permits are applied for at an early stage. Discuss the proposed works with the National Permitting Service as early as possible.
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Additional Comments:

Although this is sufficient information at Scoping stage, we would expect to see detailed consideration of each landfill identified within the Study Area at later stages of the Development Consent Order process.

Section 6.12 'Waste Management' has not Scoped In construction phase impacts relating to construction of the Proposed Development within and adjacent to existing authorised and historic landfill sites. An assessment of the risks to controlled waters from any required excavation within permitted and historic landfill and subsequent development on the landfill, has not been mentioned.

New development within 250 metres of an existing landfill could result in the nearby community being exposed to impacts including odour, noise, dust and pests. The severity of these impacts will depend on the size of the landfill, the nature of the waste it takes and prevailing weather conditions.

Planning policy requirements (paragraph 200 of the National Planning Policy Framework NPPF) state that new development should integrate effectively with existing businesses and not place unreasonable restrictions upon them. Where the operation of an existing landfill could have significant adverse effects on new development (including changes of use), the applicant should be required to provide suitable mitigation for these effects. Mitigation can be provided through the design of

the new development to minimise exposure to the neighbouring landfill and/or through financial contributions to the operator of the landfill to support measures that minimise impacts. However, although mitigation measures may protect the development from existing pollution, they cannot be considered as part of the pollution control regime for landfill and waste transfer facilities to ensure compliance with Environmental Permitting Regulations, as this is the operators responsibility. Furthermore, the new development may limit the potential for future operations at the permitted facility.

Environmental Permitting Regulations require operators to demonstrate that they have taken all reasonable precautions to mitigate impacts of their operations. This is unlikely to eliminate all emissions and there is likely to be residual impacts. In some cases, these residual impacts may cause local residents' concern. There are limits to the measures that the operator can take to prevent impacts to residents.

Consequently, it is important that planning decisions take full account of paragraph 200 of the NPPF. When a new development is built near to an existing landfill this does not automatically trigger a review of the permit. It is the operator's responsibility to consider the impact that the proposed development will have on the existing and future operations of their site.

Dewatering close to or within historic or active permitted landfills may result in the abstraction of contaminated groundwater and/or leachate. This may impact on the leachate management at the permitted landfill site. The abstracted water may be contaminated, and a permit may be required for the subsequent discharge.

Advice to Applicant		
Chapter ref: Figure 6-1	Issue	The proposed development footprint incorporates the full boundary of the permitted Stepney Lane landfill. It is not clear from the submitted documents how the pipeline and associated developments will interact with the landfill.
	Impact	Impacts on leachate and groundwater within the permitted landfill are difficult to understand without a cross-sectional representation of the scheme.
	Solution	Provide cross sections to illustrate the proposed interaction of the proposed development with the permitted landfill and provide details of proposed mitigation measures to minimise risk to groundwater quality from these works.

Additional Comments:

The proposed development should not compromise any engineered controls at new and historic landfills unless this is unavoidable. The location of this feature is not identified in Figure 6-1, and it is not identified as a possible source of contamination in Section 6.3.

In Figure 6-1-C the symbology showing historic landfill sites near Hedon and Paull is unclear, making it difficult to differentiate the historic landfill features, and the authorised landfill site near Paull (Stepney Lane) is not marked nor identified in the key. Figure 6-1-D shows historic landfills to the south of the Humber Estuary. This does not show North Killingholme historic landfill, despite other historic landfill sites further from the Proposed Development within the figure.

It is proposed to undertake consultation with East Riding of Yorkshire Council and other relevant statutory and non-statutory consultees as necessary. This may include information related to contaminated sites, groundwater abstractions, MSA, RIGS and LGS. We also encourage the applicant to consult with us on the above with North Lincolnshire Council on licensed waste sites and licensed abstractions.

Advice to Applicant

Chapter ref: 6.3.7.1	Issue	Procedures for managing unexpected contamination encountered during construction are stated to be proposed to manage to workforce health effect risks, however a protocol to management risks to groundwater quality from unexpected contamination is not mentioned.
	Impact	If a protocol for how to manage unexpected contamination in accordance with Land Contamination Risk Management guidance is not established prior to DCO, risks to controlled waters may not be adequately assessed mitigated.
	Solution	Ensure that a commitment to managing unexpected contamination is included in the outline CEMP, outline OEMP and outline Decommissioning Plan, including a watching brief and Discovery Protocol.

Additional Comments:

We would welcome the opportunity to be consulted on the approach for managing unexpected contamination.

Our suggested process is:

1. In the event that contaminated land, including groundwater, is found at any time when carrying out the authorised development, which was not previously identified in the environmental statement, then no further development (unless otherwise approved in writing by the relevant authorities) shall be carried out within the identifiable perimeters of the area in which the suspected contamination is located. It must be reported as soon as reasonably practicable to the local planning authority, and where necessary, the Environment Agency, and the undertaker must complete a risk assessment of the contamination in consultation with the local planning authority, and where necessary, the Environment Agency.
2. Where the undertaker determines that remediation of the contaminated land is necessary, a written scheme and programme for the remedial measures to be taken to render the land fit for its intended purpose must be submitted to and approved in writing by the local planning authority, following consultation with the Environment Agency.
3. Remediation must be carried out in accordance with the approved scheme under sub paragraph (2).

Following the implementation of the remediation strategy approved under sub-paragraph (2), a verification report, based on the data collected as part of the remediation strategy and demonstrating the completion of the remediation measures must be produced and supplied to the relevant planning authority and the Environment Agency.

Advice to Applicant		
Chapter ref: 6.3	Issue	The list of construction impacts does not include the potential for pollution of controlled waters from accidental damage of existing services.
	Impact	If not adequately mitigated, reduction of water quality could occur if construction works cause damage to existing underground utilities.
	Solution	The Applicant should account for reduction of water quality from damage to existing underground utilities and commit to mitigation in the oCEMP.
Additional Comments: The Applicant should outline how they propose to identify and avoid damage to existing utilities, and the measures to be employed if a pollutant release occurs as a result of construction works.		

Advice to Applicant

Chapter ref: 6.4.3.35	Issue	Groundwater Safeguard Zones are not discussed.
	Impact	Areas of high groundwater sensitivity may not be identified.
	Solution	The Applicant should clarify whether there are any relevant groundwater Safeguard Zones in addition to surface water Drinking Water Safeguard Zones and Drinking Water Protection Areas
Additional Comments:		

Advice to Applicant		
Chapter ref: 6.4.8.7 And Figure 6-7	Issue	The Applicant proposes to carry out a WFD Compliance Assessment, however this is stated only to apply to surface water bodies.
	Impact	Impacts to WFD Groundwater bodies will not be assessed, which could result in significant impacts to WFD Groundwater body status.
	Solution	The Applicant should include consideration of WFD Groundwater bodies within the WFD Compliance Assessment.
Additional Comments: Figure 6-7 shows only shows the River Basin Management Plans within which the WFD Groundwater bodies in the Study Area lie, not the WFD Groundwater bodies themselves. Reference should be made to further classification detail available within the Catchment Data Explorer .		

Additional Groundwater and Contaminated Land advice to the applicant

The Applicant is advised to draw on experience from the Humber Crossing gas pipeline developed by National Grid (formerly Feeder 9). The existing tunnel, constructed in a broadly similar location, is understood to have capacity for additional pipelines. Lessons learned from the management of ground conditions and artesian groundwater will be particularly valuable, where works were effectively controlled. Dewatering considerations will be critical at this stage.

It is stated the baseline assessment will include a Phase 1 Environmental Site Assessment in accordance with Land Contamination Risk Management (LCRM) guidance. Section 6.3.8 states that “A targeted walkover survey of the area may also be undertaken to verify desk-based findings”. LCRM guidance states that “to complete a preliminary risk assessment you need to...do a desk study and site walkover” ([LCRM: Stage 1 risk assessment - GOV.UK](#)).

Commitments Register

We encourage the Applicant to commit to avoiding the use of PFAS construction materials in buried infrastructure where alternatives exist. We further encourage the Applicant to commit to avoiding the use of PFAS-coated bentonite products in drilling muds and borehole construction, for ground investigation and construction activities including trenchless drilling.

In Scoping Report Table 6-3 Commitment CO3, the Applicant proposes to secure a Pollution Prevention and Emergency Incident Response Plan (PPEIRP) under the Code of Construction Practice. We welcome the opportunity to be consulted on this document.

Commitment CO9 states 'All construction work will be undertaken in accordance with a Drainage Strategy,' No details of the proposed content of the Drainage Strategy are currently available. The Drainage Strategy should include provisions to prevent the loss of polluting and hazardous substances to ground, including the use of impermeable bunding and hardstanding areas for fuel and oil storage, measures to prevent concrete washout, the use of sealed drainage systems including oil water interceptors and silt traps as appropriate. If bunding and hardstanding for features with the potential for pollutant release is not specified as impermeable, bunding may not adequately contain hazardous materials in the event of a release. Bunded areas should also incorporate measures to prevent or manage the build-up of rainwater.

Chapter 6.4 Water Resources and Flood Risk

Flood Risk

Advice to Applicant		
Chapter ref: Chapter 6.4 Water Resources and Flood Risk	Issue	The new strategic approach to tidal flood risk and sea level rise on the Humber.
	Impact	Long term tidal flood risk and sea level rise.
	Solution	The Applicant should remain engaged with the works the EA and the Humber 2100+ partnership to ensure it is resilient to the impacts of: • Flood risk • Climate change • Sea level rise For the lifetime of the development.
Additional Comments: The Humber 2100+ Partnership is developing a new strategic approach for managing tidal flood risk and the impacts of sea level in the long term. The Humber 2100+ area of interest encompasses most of the pipeline route and will have implications for the hydrogen network and surrounding communities. The Humber 2100+ is preparing strategic work that responds to climate change, tidal flooding and sea level rise. These factors will be required to be assessed within the developments EIA, and where possible opportunities for alignment, and ensure the latest evidence can be considered as pipeline plans develop. As both Humber 2100+ Partnership work and pipeline plans develop in the coming years there may be opportunities to support the resilience of industry and region served by the pipeline. Evidence shows that in addition to flood defences, a broader set of tools will be needed to help build resilience across the estuary and allow the region to adapt to change over time. The strategic response may include; • Using land differently. • Working with natural processes. • Acknowledging some areas will flood more frequently. We expect land use change over the lifetime of the pipeline, in response to both increasing tidal flood risk and actions to manage that risk. The Humber 2100+ Partnership is applying an adaptive approach. This is a long-term, flexible approach, which involves planning, monitoring change, and responding at the right time, to avoid short term decisions that could impact future options, and to stay responsive to new evidence and changing conditions Humber 2100 Partnership: Humber 2100+ Engage Environment Agency.		

The current Humber (tidal) Flood Risk Management Strategy can be found here. This has been in delivery since 2008. Some of the information referenced within this document will have been superseded. [Humber flood risk management strategy - GOV.UK](#)

Advice to Applicant		
Chapter ref: Chapter 6.4 Water Resources and Flood Risk	Issue	Paul Holmes Strays habitat site has not been identified as key habitat of importance.
	Impact	Not assessing the impacts to the Paul Holmes Strays habitat site could reduce the strategic tidal flood risk management activities and valuable ecological features of the Humber Estuary.
	Solution	Paul Holmes Strays site should be included as part of HRA screening assessment and any subsequent stages of the HRA process.
Additional Comments: We note the intention to undertake a HRA to accompany the Application. Paul Holme Strays is owned by the Environment Agency, and the site is managed with Yorkshire Wildlife Trust. Paul Holmes Strays habitat site (noted as coastal saltmarsh) falls within the scoping boundary. Paul Holmes Strays was created as part a strategic approach to delivering the required compensation for the impact of our tidal flood risk management activities on the designated features of the Humber estuary. Thus, any risks to the function of this site affects both important ecology and the ability to manage tidal flood risk along the pipeline route including to the industry served by it. The Energy NPS (5.4.5) notes that sites identified, or required, as <i>compensatory measures for adverse effects</i> should be given the same protection as sites covered by the Habitats Regulations and an HRA will also be required. As Natural England are best placed to advise on compliance with the habitat's regulations, we defer to their expertise and response regarding the HRA, and any measures needed to reduce risks to sensitive wildlife receptors.		

Water Quality

Advice to Applicant		
Chapter ref: 6.4 Water Resources and Flood Risk 6.4.4 project basis for scoping assessment	Issue	Pollution due to fire waters is not included.
	Impact	Firefighting waters can be very detrimental to the watercourses and to groundwater and could lead to the pollution of controlled waters.
	Solution	We require the applicant provide details for how the drainage system will adequately manage the risk presented by an AGI fire.
Additional Comments: Fires at AGI's should be considered as a risk to ground and surface waters and satisfactory mitigation put in place to protect these from firefighting waters. Information that should be provided for the drainage strategy are: • How the drainage system will be closed off from discharge water to the environment (automatically and manually). • Storage capacity for fire water should also be provided. • Maintenance procedures that will be carried out before normal drainage resumes. • Drainage maintenance schedule.		

Advice to Applicant		
Chapter ref: 6.4 Water Resources and Flood Risk TABLE 6-10: Likely Effects – Water Resources and Flood Risk	Issue	Water quality impacts from discharges of construction site drainage and groundwater have not been included.
	Impact	Without proper assessment, discharges of silty or contaminated rainfall runoff and groundwater could enter surface waters, increasing the risk of pollution incidents and adversely affecting water quality and aquatic environments.
	Solution	The applicant should assess the potential impacts of discharges from construction site drainage and groundwater and identify appropriate mitigation measures to protect surface water quality.
Additional Comments:		

Advice to Applicant		
Chapter ref:	Issue	Water Quality monitoring is not outlined to be conducted for the proposal.

6.4 Water Resources and Flood Risk Section 6.4.8 proposed approach to the assessment	Impact	If water quality monitoring is not included then a suitable baseline of water quality data may not be captured, and any trends in water quality deterioration or improvement as a result of the project may not be understood.
	Solution	We require the Applicant to provide a water quality monitoring program that provides the following details: • Locations • Frequency • Quantity • Methods of monitoring. Water quality monitoring should be conducted 6 months (minimum) pre-construction, throughout the construction and post-construction/operational phase.
Additional Comments:		

Chapter 6.7 Ecology and Nature Conservation

Biodiversity

Advice to Applicant		
Chapter ref: 6.7. Ecology and Nature Conservation	Issue	A riparian buffer alongside watercourses during the construction stage, as both a habitat protection and pollution prevention measure.
	Impact	Without a riparian buffer during construction, there is an increased risk of habitat disturbance and degradation, as well as reduced water quality from sediment runoff and pollution.
	Solution	Maintain a riparian buffer alongside the watercourses. As a minimum, we would expect this to be 10m from the bank-top, where no infrastructure will be sited.
Additional Comments: The applicant should ensure there is a sufficient buffer between the development, any fences and any watercourse or ditch. This will allow for natural river corridor to be maintained and free movement of riparian mammals up and down the system.		

Advice to Applicant		
Chapter ref: 6.7. Ecology and Nature Conservation Section: 6.7.4.3	Issue	Open-cut techniques will be used as part of pipeline installation, to create trenches for pipes and cables.
	Impact	Open cut methods for cabling or pipelines can destroy habitats, including those of protected species such as the water vole. Installation of cables or pipelines can also prevent free movement of mammals along the river corridor. Compounds and trenches associated with installation present a risk of entrapment of mammals such as otter and therefore will need to be securely fenced.
	Solution	Reinstatement of bankside habitats along watercourses and ditches should be considered after completion of works. This could include sowing the bankside habitats with a species rich locally appropriate sward, and erecting fencing to prevent livestock access (where appropriate).
Additional Comments:		

Fisheries

Advice to Applicant		
Chapter ref: 6.7. Ecology and Nature Conservation	Issue	Impacts to fish and aquatic species.
	Impact	If impacts on fish are not assessed adequately in the EIA, the proposal may harm this receptor and loss or damage its habitat. This may also lead to a deterioration in WFD status.
	Solution	Baseline data should be obtained through a desk study (including EA fish population data) and field surveys, particularly where in-channel works are proposed. Impact-pathways should be identified and assessed in the EIA, which should include (but not limited to): • impacts from noise and vibration associated with construction • impacts from pollution and increased sedimentation • impacts from open cut crossing of watercourses and potential loss or damage to habitat • impacts from light pollution on watercourses and aquatic ecology
Additional Comments:		

Advice to Applicant		
Chapter ref: 6.7 Ecology and Nature Conservation Section 6.7.3.33	Issue	Desk study does not include EA fish population data.
	Impact	Insufficient baseline to inform the EIA.
	Solution	The desk study must include freely available EA fish population survey data, which is available here - EA Ecology & Fish Data Explorer
Additional Comments:		

Advice to Applicant		
Chapter ref: 6.7 Ecology and Nature Conservation	Issue	Pre-decommissioning ecology surveys.
	Impact	Appropriate decommissioning activities and mitigation measure may be inappropriate.

Section 6.7.4.9	Solution	The EA request to be consulted on any pre decommissioning ecology surveys.
Additional Comments:		

APPENDIX C - Informative

Abstraction, discharges and dewatering

If dewatering is required, it may require an environmental permit if it doesn't meet the exemption in The Water Abstraction and Impounding (Exemptions) Regulations 2017 Section 5: Small scale dewatering in the course of building or engineering works.

More information can be found here: [Temporary dewatering from excavations to surface water: RPS 261](#)

Since 01 January 2018, most cases of new planned dewatering operations above 20 cubic meters a day will require a water abstraction license from the agency, prior to the commencement of dewatering activities at the site, if it doesn't meet the criteria for exemption in The Water Abstraction and Impounding (Exemptions) Regulations 2017 Section 5: Small scale dewatering in the course of building or engineering works. A subsequent discharge may require a permit if it falls outside of our regulatory position statement for de-watering discharges.

The applicant may also need to consider discharge of groundwater, especially if it is contaminated. More information can be found here: [Discharges to surface water and groundwater: environmental permits](#). The use of drilling muds for the directional drilling may require a groundwater activity permit unless the 'de minimis' exemption applies. Early discussion about this is also recommended.

Flood Risk Activity Permit

The Environmental Permitting (England and Wales) Regulations 2016 require a permit or exemption to be obtained for any activities which will take place:

- on or within 8 metres of a main river (16 metres if tidal)
- on or within 8 metres of a flood defence structure or culverted main river (16 metres if tidal)
- involving quarrying or excavation within 16 metres of any main river, flood defence (including a remote defence) or culvert
- in the floodplain of a main river if the activity could affect flood flow or storage and potential impacts are not controlled by a planning permission

For further guidance please visit [Flood risk activities: environmental permits](#) or contact our National Customer Contact Centre on 03708 506 506 (Monday to Friday, 8am to 6pm) or by emailing enquiries@environment-agency.gov.uk

The applicant should not assume that a permit will automatically be forthcoming once planning permission has been granted, and we advise them to consult with us at the earliest opportunity.

It would be helpful to understand whether or not the developer is proposing to disapply the Environmental Permitting Regulations (EPR) for Flood Risk Activity Permits (FRAPs). We would recommend early engagement of this matter.

Dewatering Environmental Permits

If dewatering is required, it will require an abstraction licence if it doesn't meet the criteria for exemption in [*The Water Abstraction and Impounding \(Exemptions\) Regulations 2017 Section 5: Small scale dewatering in the course of building or engineering works*](#). It may also require a discharge permit if it falls outside of our [regulatory position statement for de-watering discharges](#).

If the applicant does not meet the exemption and requires a full abstraction licence, applicants should be aware that some aquifer units may be closed for new consumptive abstractions in this area. More information can be found on GOV.UK: [Abstraction licensing strategies \(CAMS process\)](#) and [Apply for a water abstraction or impounding licence](#).

If the dewatering activity can be demonstrated to be discharged to the same source of supply without intervening use (i.e. non-consumptive), this will increase the likelihood of a licence being granted.

Please note that the typical timescale to process a licence application is 9-12 months. The applicant may wish to consider whether a scheme-wide dewatering application rather than individual applications would be beneficial. We suggest talking to our National Permitting Service early in the project planning.

Temporary dewatering of wholly or mainly rainwater that has accumulated in an excavation may be exempt from an Environmental Permit for a Water Discharge Activity. More information can be found on our website: [Temporary dewatering from excavations to surface water: RPS 261](#). Note that this does not permit discharge of groundwater from a passive or active dewatering activity or permit the abstraction of groundwater.

Also note [Small-scale abstractions for construction dewatering: RPS 368](#).

Land Contamination Assessments

We expect land contamination assessments to follow the tiered approach laid out in our [Land Contamination Risk Management \(LCRM\)](#) guidance.

The preliminary risk assessment (PRA) should include historical plans of the site, an appraisal of the environmental setting (including geology, hydrogeology, groundwater and surface water receptors, potential contaminants of concern and source areas),

an initial conceptual site model (CSM) describing possible pollutant linkages for controlled waters, and identification of potentially unacceptable risks.

Land contamination investigations should be undertaken by suitably qualified and experienced professionals and in accordance with [BS 5930: Code of practice for ground investigations](#) and [BS 10175: Investigation of potentially contaminated sites – code of practice](#). Soil and water analysis should be fully MCERTS accredited.

Investigation, demolition, remediation, or construction works must not create new pathways or linkages to controlled waters. Clean drilling techniques may be required for boreholes that penetrate contaminated ground.

Waste

The Environmental Protection (Duty of Care) Regulations 1991 for dealing with waste materials are applicable to any off-site movements of wastes. The code of practice applies to you if you produce, carry, keep, dispose of, treat, import or have control of waste in England or Wales.

The law requires anyone dealing with waste to keep it safe and make sure it's dealt with responsibly and only given to businesses authorised to take it. The code of practice can be found here:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/506917/wasteduty-care-code-practice-2016.pdf

If you need to register as a carrier of waste, please follow the instructions here:

<https://www.gov.uk/register-as-a-waste-carrier-broker-or-dealer-wales>

If materials that are potentially waste are to be used on-site, the applicant will need to ensure they can comply with the exclusion from the Waste Framework Directive (WFD) (article 2(1) (c)) for the use of, 'uncontaminated soil and other naturally occurring material excavated in the course of construction activities, etc...' in order for the material not to be considered as waste. Meeting these criteria will mean waste permitting requirements do not apply. Where the applicant cannot meet the criteria, they will be required to obtain the appropriate waste permit or exemption.

A deposit of waste to land will either be a disposal or a recovery activity. The legal test for recovery is set out in Article 3(15) of WFD as:

- any operation the principal result of which is waste serving a useful purpose by replacing other materials which would otherwise have been used to fulfil a particular function, or waste being prepared to fulfil that function, in the plant or in the wider economy
- we have produced guidance on the recovery test which can be viewed at:

[Waste recovery plans and deposit for recovery permits - GOV.UK](#)

You can find more information on the Waste Framework Directive here

<https://www.gov.uk/government/publications/environmental-permitting-guidance-the-wasteframework-directive>.

More information on the definition of waste can be found here

<https://www.gov.uk/government/publications/legal-definition-of-waste-guidance>

More information on the use of waste in exempt activities can be found here

<https://www.gov.uk/government/collections/waste-exemptions-using-waste>

Non-waste activities are not regulated by us (i.e. activities carried out under the CL:ARE Code of Practice), however you will need to decide if materials meet End of Waste or By-products criteria (as defined by the Waste Framework Directive). The 'Is it waste' tool, allows you to make an assessment and can be found here [Check if your material is waste - GOV.UK](#)

Where a development involves any significant construction or related activities, we would recommend using a management and reporting system to minimise and track the fate of construction wastes, such as that set out in PAS402: 2013, or an appropriate equivalent assurance methodology. This should ensure that any waste contractors employed are suitably responsible in ensuring waste only goes to legitimate destinations.

Where development involves the use of any non-road going mobile machinery with a net rated power of 37kW and up to 560kW, that is used during site preparation, construction, demolition, and/or operation, at that site, we strongly recommend that the machinery used shall meet or exceed the latest emissions standards set out in Regulation (EU) 2016/1628 (as amended). This shall apply to the point that the machinery arrives on site, regardless of it being hired or purchased, unless agreed in writing with the Local Planning Authority (LPA).

This is particularly important for major residential, commercial, or industrial development located in or within 2km of an Air Quality Management Area for oxides of Nitrogen (NOx), and or particulate matter that has an aerodynamic diameter of 10 or 2.5 microns (PM10 and PM2.5). Use of low emission technology will improve or maintain air quality and support LPAs and developers in improving and maintaining local air quality standards and support their net zero objectives.

We also advise, the item(s) of machinery must also be registered (where a register is available) for inspection by the appropriate Competent Authority, which is usually the

local authority. The requirement to include this may already be required by a policy in the local plan or strategic spatial strategy document. The Environment Agency can also require this same standard to be applied to sites which it regulates. To avoid dual regulation, this informative should only be applied to the site preparation, construction, and demolition phases at sites that may require an environmental permit.

Non-Road Mobile Machinery includes items of plant such as bucket loaders, forklift trucks, excavators, 360 grab, mobile cranes, machine lifts, generators, static pumps, piling rigs etc. The Applicant should be able to state or confirm the use of such machinery in their application, to which this then can be applied.

Waste on site

Excavated materials that are recovered via a treatment operation can be re-used on-site under the CL:AIRE Definition of Waste: Development Industry Code of Practice.

This voluntary Code of Practice provides a framework for determining whether or not excavated material arising from site during remediation and/or land development works are waste.

Developers should ensure that all contaminated materials are adequately characterised both chemically and physically, and that the permitting status of any proposed on site operations are clear. If in doubt, the Environment Agency should be contacted for advice at an early stage to avoid any delays.

The Environment Agency recommends that developers should refer to our:

- [CL:AIRE Definition of Waste: Code of Practice](#)
- [EA Regulatory Position Statement 215](#): Treating small volumes of contaminated soil and groundwater

Waste to be taken off site

Contaminated soil that is, or must be disposed of, is waste. Therefore, its handling, transport, treatment and disposal is subject to waste management legislation, which includes:

- Duty of Care Regulations 1991
- Hazardous Waste (England and Wales) Regulations 2005
- Environmental Permitting (England and Wales) Regulations 2010
- The Waste (England and Wales) Regulations 2011

Developers should ensure that all contaminated materials are adequately characterised both chemically and physically in line with British Standards BS EN

14899:2005 'Characterisation of Waste - Sampling of Waste Materials - Framework for the Preparation and Application of a Sampling Plan' and that the permitting status of any proposed treatment or disposal activity is clear. If in doubt, the Environment Agency should be contacted for advice at an early stage to avoid any delays.

Sustainable Drainage Systems

The Government's expectation is that sustainable drainage systems (SuDS) will be provided in new developments wherever this is appropriate. The Environment Agency supports this expectation.

Where infiltration SuDS are to be used for surface run-off from roads, car parking and public or amenity areas, they should:

- be suitably designed
- meet Government's non-statutory technical standards for sustainable drainage systems – these standards should be used in conjunction with the National Planning Policy Framework and Planning Practice Guidance
- use a SuDS management treatment train – that is, use drainage components in series to achieve a robust surface water management system that does not pose an unacceptable risk of pollution to groundwater

Where infiltration SuDS are proposed for anything other than clean roof drainage in a SPZ1, a hydrogeological risk assessment should be undertaken, to ensure that the system does not pose an unacceptable risk to the source of supply.

See the Environment Agency's approach to groundwater protection, position statement G13: [Groundwater protection position statements](#).

Fw: Re: EN0710006 - Humber Hydrogen Pipeline - EIA Scoping and Consultation

From [REDACTED]@planninginspectorate.gov.uk>

Date Mon 2026-06-29 14:57

To [REDACTED].CLARKE@planninginspectorate.gov.uk>

 5 attachments (10 KB)

Outlook-nvhle5k1.png; Outlook-kczwff12.png; Outlook-Logo, comp.png; Outlook-Icon Desc.png; Outlook-Icon Desc.png;



Planning Inspectorate
Arolygiaeth Gynllunio

[REDACTED] BA (Hons)

NSIP Assistant Case Officer
Planning Inspectorate

[REDACTED] | **Helpline:** 0303 444 5000

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From: FS, Yorkshire and North East Area

Sent: Monday, June 22, 2026 09:44

To: Humber Hydrogen Pipeline

Subject: Fw: Re: EN0710006 - Humber Hydrogen Pipeline - EIA Scoping and Consultation

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Hello,

Thank you for consulting the Forestry Commission about this proposal.

As a Non-Ministerial Government Department, the Forestry Commission provides no opinion supporting or objecting to an application. Rather we provide advice on the potential impact that the

proposed development could have on trees and woodland including ancient woodland.

Ancient Woodlands (ASNW/PAWS), Ancient Trees and Veteran Trees (AVT)

As noted in the Environmental Impact Assessment Scoping Report there is one woodland identified as ancient woodland in Natural England's Ancient Woodland Inventory (AWI), and several small woodlands identified as Habitats of Principal Importance in the Priority Habitat Inventory. The Report indicates that the Likely Significance of Effect is "Minor - Not Significant".

Ancient woodlands, ancient trees and veteran trees, are irreplaceable. They have great value because they have a long history of woodland cover, with many features remaining undisturbed, including immensely complex ecological processes and relationships, above and below the ground. This applies equally to Ancient Semi Natural Woodland (ASNW), Plantations on Ancient Woodland Sites (PAWS), ancient trees and veteran trees (AVT). It is Government policy to refuse development that will result in the loss or deterioration of irreplaceable habitats including ancient woodlands, ancient trees and veteran trees, unless "there are wholly exceptional reasons and a suitable compensation strategy exists" (National Planning Policy Framework paragraph 186c). It is not possible to fully compensate for the loss of an irreplaceable habitat, therefore measures should be in place to ensure that no loss or deterioration occurs to the identified irreplaceable habitats, as a result of the development.

Natural England and the Forestry Commission have published standing advice on ancient woodland, which should be consulted where development occurs close to ancient woodland, ancient trees or veteran trees. The standing advice provides information on the nature of potential direct and indirect impacts from development, on ancient woodland, ancient trees and veteran trees. It also provides information on mitigation, including the use of buffers. The standing advice makes clear that "the size and type of buffer zone should vary" depending on the scale and type of development. An arboricultural assessment should clearly demonstrate the minimum buffer required to ensure that there is no deterioration of irreplaceable habitats, taking into account direct, indirect and cumulative effects arising during construction, operation, maintenance and decommission.

The Forestry Commission advises that the most up-to-date Ancient Woodland Inventory (AWI) should be used throughout the assessment process. The inventory has recently been updated. The Applicant should also refer to the Woodland Trust Ancient Tree Inventory and any other relevant datasets to identify ancient, veteran and notable trees that may be affected by the proposed development. An arboricultural assessment should identify all ancient trees and veteran trees (including any ancient trees and veteran trees not recorded in the inventories/datasets above) potentially affected by the proposed development and assess impacts arising from construction, operation, maintenance and decommissioning activities across the lifetime of the project.

Biodiversity Duty and Policy Context

Under Section 40 of the Natural Environment and Rural Communities (NERC) Act 2006, as amended by the Environment Act 2021, the biodiversity duty requires public authorities (including when exercising their functions under the planning system) to have regard to the purpose of conserving and enhancing biodiversity.

The Environmental Statement should demonstrate consideration of the Environment Act 2021 biodiversity targets, including the statutory targets to:

- *
Halt the decline in species abundance by 2030

- *
Increase species abundance so that by 2042 it is greater than in 2022, and at least 10% greater than 2030
- *
Improve the Red List Index for England species extinction risk by 2042, compared to 2022 levels
- *
Restore or create in excess of 500,000 hectares of wildlife-rich habitats outside of protected sites by 2042. A new interim target was also set within the EIP23 to restore or create 140,000 hectares of a range of wildlife-rich habitats outside protected sites by 2028.

These targets are directly relevant to trees, woodlands, hedgerows and associated habitat impacts within the scheme.

Government policy strongly supports **increasing tree and woodland cover in England** , including commitments to:

- * Reach **16.5% tree and woodland cover in England by 2050** (Tree Action Plan for England)
- * Increase woodland creation rates to support net zero and biodiversity objectives
- * Deliver landscape-scale nature recovery through the Environmental Improvement Plan 2023
- * Contribute to the England Trees Action Plan ambition to expand woodland creation and tree canopy cover

Where tree, woodland or hedgerow loss is unavoidable, the Forestry Commission encourages the Applicant to provide robust justification and to consider significant compensatory woodland creation, planting of trees outside of woodlands, hedgerow creation and habitat enhancement measures that exceed the area of permanent loss and contribute positively to local woodland networks and landscape-scale connectivity.

The Environmental Statement should clearly quantify:

- *
Temporary tree/woodland/hedgerow removal
- *
Permanent tree/woodland/hedgerow removal
- *
Tree/woodland/hedgerow retained
- *
Areas subject to restocking or natural regeneration
- *
Proposed compensatory woodland creation, planting of trees outside of woodlands, hedgerow creation and habitat enhancement measures

This information is necessary to assess the scheme in the context of national policy objectives relating to climate mitigation, biodiversity recovery and woodland and tree canopy cover expansion.

Conclusion

The Forestry Commission considers that ancient woodland, and woodland and hedgerow Habitats of Principal Importance should remain scoped into the Environmental Impact Assessment.

The Environmental Statement should demonstrate full consideration of statutory biodiversity duties, national woodland expansion policy and environmental improvement targets, and should provide sufficient information to assess direct, indirect and cumulative effects on these receptors.

What is most important to the Forestry Commission is that there will be no loss or detrimental impact as a result of this proposed development on ancient woodland, ancient trees and veteran trees as mentioned above, with an overall net gain delivered for tree and woodland cover, and the biodiversity of their associated habitats.

We hope these comments are helpful to you. If you have any further queries please do not hesitate to contact the Forestry Commission at this email address provided.

Many thanks,



Local Partnership Advisor

Yorkshire and North East Area

Foss House, King's Pool
1-2 Peasholme Green
York
YO1 7PX

Tel 0300 067 4900

From: Humber Hydrogen Pipeline <HumberHydrogenPipeline@planninginspectorate.gov.uk >
Sent: Friday, May 22, 2026 10:36
Subject: EN0710006 - Humber Hydrogen Pipeline - EIA Scoping and Consultation

This Message originated outside your organisation.

Dear Sir/Madam

Please see attached correspondence on the proposed Humber Hydrogen Pipeline.

The applicant for the proposed development intends to make an application for Development Consent under the Planning Act 2008. The applicant has sought a Scoping Opinion from the Planning Inspectorate, on behalf of the Secretary of State, as to the scope and level of detail of the information to be provided within the Environmental Statement that will accompany its future application.

The Planning Inspectorate has identified you as a consultation body to inform the Scoping Opinion and is therefore inviting you to submit comments by **19 June 2026**. The deadline is a statutory requirement that cannot be extended.

Further information is included within the attached letter.

Kind regards

Jack Patten



The Planning
Inspectorate

Jack Patten [REDACTED]
Environmental Advisor
Planning Inspectorate



@PINSgov



The Planning Inspectorate



planninginspectorate.gov.uk

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DPC:76616c646f72

Jack Patten

From: FPL - Conx Request <ConnectionRequest@fulcrum.co.uk>
Sent: 22 May 2026 16:33
To: Humber Hydrogen Pipeline
Subject: RE: EN0710006 - Humber Hydrogen Pipeline - EIA Scoping and Consultation

Follow Up Flag: Follow up
Flag Status: Flagged

Categories: EST

You don't often get email from connectionrequest@fulcrum.co.uk. [Learn why this is important](#)

Good Afternoon

We can confirm Fulcrum Pipelines Limited do not have any existing pipes or equipment on or around the above site address.

Please note that other gas transporters may have plant in the area which could be affected by your proposed works.

We will always make every effort to help you where we can, but Fulcrum Pipelines Limited will not be held responsible for any incident or accident arising from the use of the information associated with this search. The details provided are given in good faith, but no liability whatsoever can be accepted in respect thereof.

If you need any help or information simply contact Fulcrum on 03330 146 455.

In case of an emergency please phone 0800 111 999.

Kind regards,



FPL - Conx Request

e: ConnectionRequest@fulcrum.co.uk | w: www.fulcrum.co.uk

a: Fulcrum, 4 Europa Court, Sheffield Business Park, Sheffield, S9 1XE, T: 03330 1

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From: Humber Hydrogen Pipeline <HumberHydrogenPipeline@planninginspectorate.gov.uk>

Sent: 22 May 2026 10:36

Subject: EN0710006 - Humber Hydrogen Pipeline - EIA Scoping and Consultation

THIS IS AN EXTERNAL MESSAGE - PLEASE EXERCISE CAUTION

CEMHD Policy - Land Use Planning,
NSIP Consultations,
Building 1.2,
Redgrave Court,
Merton Road,
Bootle, Merseyside
L20 7HS.

HSE email: NSIP.applications@hse.gov.uk

Email: humberhydrogenpipeline@planninginspectorate.gov.uk

Dear Mr Jack Patten (PINS)

Date: 15 June 2026

**PROPOSED HUMBER HYDROGEN PIPELINE (the project)
PROPOSAL BY HUMBER HYDROGEN TRANSMISSION SYSTEM LTD (the applicant)
INFRASTRUCTURE PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 2017 (as
amended) REGULATIONS 10 and 11**

Thank you for your letter of 22 May 2026 regarding the information to be provided in an environmental statement relating to the above project. HSE does not comment on EIA Scoping Reports but the following information is likely to be useful to the applicant.

HSE's land use planning advice

Will the proposed development fall within any of HSE's consultation distances?

Based on information provided to date by the Applicant, and according to HSE records, components of the redline boundary of the proposed Humber Hydrogen Pipeline (ref. Figure 1-1, Humber Hydrogen Pipeline Site Location Plan, Version A01, dated 13/05/2026) cross the Consultation Zones (CZs) of Major Accident Hazard (MAH) sites associated with the following operators:

	HSE Ref.	MAH site operator	MAH site address
1	H0125	Centrica Storage Limited	Easington Gas Terminal, Dimlington Road, Easington, Hull HU12 0SX
2	H0142	INEOS Acetyls UK Limited	Saltend Chemicals Park, Saltend, Hull HU12 8DS
3	H0145	Perenco UK Limited	Easington Gas Terminal, Vicar's Lane, Easington, Hull HU12 0TJ
4	H3029	Perenco UK Limited	Easington Gas Terminal, Dimlington Road, Easington, Hull HU12 0SX
5	H3503	SSE Hornsea Limited	Aldbrough Gas Storage, Aldbrough, Hull HU11 4QB
6	H3697	Mitsubishi Chemical UK Limited	Saltend Chemicals Park, Saltend, Hull HU12 8DS
7	H4223	Gassco AS UK Branch	Langede Receiving Facilities, Dimlington Road, Easington, Hull HU12 0TG
8	H4342	Vivergo Fuels Limited	Saltend Chemicals Park, Saltend, Hull HU12 8DS
9	H4360	INEOS Manufacturing (Hull) Limited	Saltend Chemicals Park, Saltend, Hull HU12 8DS
10	H4719	Saltend Chemicals Park Limited	Saltend Chemicals Park, Saltend, Hull HU12 8DS

The Applicant should make contact with the above operators, to inform an assessment of whether or not the proposed development is vulnerable to a possible major accident.

There are also several major accident hazard pipelines that the components of the proposed development crosses, associated with the following operators:

	HSE Ref.	Transco Ref.	Pipeline Operator	Pipeline
1	7026	1297	National Gas Transmission PLC	9 Feeder North Bank of Humber/Hatton
2	7030	1301	Cadent Gas Limited	Skitter/Thornton Curtis
3	7039	1310	National Gas Transmission PLC	22 Feeder Goxhill/Hatton
4	7040	1311	Cadent Gas Limited	East Halton/Killingholme
5	7727	1979	National Gas Transmission PLC	6 Feeder Burton Agnes/Paull
6	7728	1980	National Gas Transmission PLC	6 Feeder Paull/Saltend
7	7732	1984	National Gas Transmission PLC	9 Feeder Easington/Paull
8	7733	1985	National Gas Transmission PLC	19 Feeder Easington/Paull
9	7734	1986	National Gas Transmission PLC	1 Feeder Easington/Paull
10	8394	2671	National Gas Transmission PLC	6 Feeder Rose Hill AGI Supply
11	9669	-	INEOS Manufacturing (Hull) Limited	Teeside to Saltend Ethylene Pipeline
12	12689	-	Saltend Cogeneration Company Limited	NTS to Salt End Power Station
13	12732	2748	Northern Gas Networks Limited	Saltend/Paull
14	14034	2761	National Gas Transmission PLC	6 Feeder Sproatly/Aldbrough
15	4032672	2783	National Gas Transmission PLC	29 Feeder Easington/Grinstead
16	4132364	2771	National Gas Transmission PLC	9 Feeder Easington/Dimlington
17	4168177	2796	National Gas Transmission PLC	24 Feeder Easington/Paull

The Applicant should make the necessary approaches to the relevant pipeline operators. There are three particular reasons for this:

- i) the pipeline operator may have a legal interest in developments in the vicinity of the pipeline. This may restrict developments within a certain proximity of the pipeline.
- ii) the standards to which the pipeline is designed and operated may restrict major traffic routes within a certain proximity of the pipeline. Consequently, there may be a need for the operator to modify the pipeline or its operation, if the development proceeds.
- iii) to establish the necessary measures required to alter/upgrade the pipeline to appropriate standards.

HSE's Land Use Planning advice would be dependent on the location of areas where people may be present. When we are consulted by the Applicant with further information under Section 42 of the Planning Act 2008, we can provide full advice.

Hazardous Substance Consent

The presence of hazardous substances on, over or under land at or above set threshold quantities (Controlled Quantities) will probably require Hazardous Substances Consent (HSC) under the Planning (Hazardous Substances) Act 1990 as amended. The substances, alone or when aggregated with others for which HSC is required, and the associated Controlled Quantities, are set out in The Planning (Hazardous Substances) Regulations 2015 as amended.

HSC would be required to store or use any of the Named Hazardous Substances or Categories of Substances at or above the controlled quantities set out in Schedule 1 of these Regulations.

If hazardous substances planning consent is required, please consult HSE on the application.

Consideration of Risk Assessments

Regulation 5(4) of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 requires the assessment of significant effects to include, where relevant, the expected significant effects arising from the proposed development's vulnerability to major accidents. HSE's role on NSIPs is summarised in the Advice Note 11 Annex on the Planning Inspectorate's website – [Annex G – The Health and Safety Executive](#). This document includes consideration of risk assessments on page 3.

Explosives sites

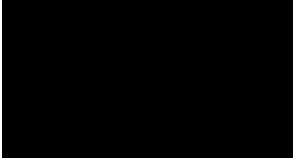
Explosives Inspectorate has no comment to make as the proposed development does not fall into any of the safeguarding zones of the nearby HSE licenced explosives sites.

Electrical Safety

No comment from a planning perspective.

At this time, please send any further communication on this project directly to the HSE's designated e-mail account for NSIP applications at nsip.applications@hse.gov.uk. We are currently unable to accept hard copies, as our offices have limited access.

Yours sincerely



CEMHD4 NSIP Consultation Team

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English

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Please see <https://www.hse.gov.uk/help/privacy.htm> for more details.

Direct Dial: 01904 601858

Our ref: PL00802016

PINS ref.: EN0710006

By email

Date: 10 June 2026

Dear Madam or Sir,

Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (The EIA Regulations) – Regulations 10 and 11

Application by Northern Gas Networks (the applicant) for an Order granting Development Consent for the Humber Hydrogen Pipeline (the proposed development)

Scoping consultation and notification of the applicant's contact details and duty to make available information to the applicant if requested

Thank you for your communication of 29 May 2026 consulting Historic England on the above EIA Scoping Report.

The scheme is outlined in the Consultation Documents provided as a link to the documentation website online. The documents which the following comments refer to are:

- Environmental Impact Assessment Scoping Report - Humber Hydrogen Transmission System (HHTS), Project No. 0828110

In relation to Listed Buildings, the remit for detailed comments and advice on Grade II Listed Buildings largely lies with the relevant Local Authority Conservation Officers.

The remit for detailed comments and advice on non-designated archaeological remains largely lies with the relevant Local Authority Archaeological Advisors. However, our advice, includes comments on the submitted documents relating to the archaeological assessments and mitigation proposals, as well as suggestions of further detail we would expect to see presented in the Environmental Statement (ES) and Archaeological Mitigation Strategy.

Project summary

We understand the Proposed Development will comprise the construction of new pipelines for the transport of hydrogen across Yorkshire. The Proposed Development

will also comprise Above Ground Installations (AGIs) and other associated infrastructure.

Historic England's Advice

Having reviewed the EIA Scoping Report including associated Figures, we note the principal infrastructure has the potential to have direct and indirect impacts on heritage assets.

These would include built heritage and buried archaeology of both designated and undesignated status.

General Points

We agree in general with the topics scoped in and out for the EIA in relation to the three phases: construction, operation and decommissioning.

In regard to heritage assets, we need to point out that a flexible approach to impact assessment and study areas would be welcomed in relation to results from surveys and evaluations during the preparation of the EIA.

Specific Points

Regarding the study area in **Table 6 -1** and **chapter 6.9.3.3**, we do not consider a baseline study area of 500m sufficient for setting effects. Current comparable projects in the area consider a study area of 1km for designated heritage, and we recommend a flexible and iterative approach to the assessment of the significance of heritage assets. This will allow to react to any changes in design to the draft Order Limits. We welcome the particular attention to the impact of AGIs on the significance of designate heritage.

In **Table 6 – 40**, the term “setting impact to designated heritage assets” should not be used going forward. What is important to assess is the impact on the significance of heritage assets and setting. This distinction should be made clear in the EIA. In this regard we advise paying particular attention to the cumulative effect of developments in the region on the setting of designated heritage assets.

The Scoping Report mentions ‘Socio-cultural’ and ‘Socio-economic’ aspects of the proposed development in **chapter 6.11**. The report touches on the contribution the historic environment and heritage assets can make to sectors, such as tourism. Historic England welcomes further opportunities to engage with the applicant, in particular as the final route to the pipeline will be defined in an iterative process. It is essential to identify and mitigate impact on heritage assets resulting from this evolving design process (chapter 5). We would recommend scoping in a potential to enhance the heritage assets impacted on by the Proposed Development through improved interpretation or active community engagement. **Chapter 6.11** of the Scoping Report provides details on the heritage assets in the scope of the project. However, it does not detail how the historic environment can be included in mitigation strategies. It is beneficial for such projects to include considerations about the active involvement of the public in archaeological mitigation. As such, Historic England would be happy to

work with the applicant to provide examples and advice on public engagement for the wider benefit of the community.

Questions to consultees:

5.12.1.1 Do consultees agree with the general strategy for assessing effects?

Yes

Re 5.12.1.2 Can the consultees provide any further information on developments that they think should be included in the cumulative effects assessment?

The cumulative aspect of the project needs to assess all current pipeline project in the area, in particular the Humber crossing with the listed Building of Paull Holme Tower and Scheduled Monument. In this regard we want to draw attention to the Humber Carbon Capture Pipeline (PINS EN) which will be installed in the same location using an HDD method and trialling this approach in the near future. The impact on the designate heritage assets should be mitigated by consulting the HCCP applicant.

6.9.9.1 Do consultees agree with the Study Area that has been identified?

We have raised concerns above and think that a more flexible and iterative approach should be taken to assess the impact on the significance of designated heritage assets.

6.9.9.2 Do consultees agree that the baseline data sources identified are sufficient to adequately characterise the baseline?

We recommend to also use Historic England's Aerial sources (aerial photo and lidar resources) and make use of the Environment Agency's Lidar resources. It will also be necessary to consult the relevant research framework to put any assessment strategies in context.

6.9.9.3 Do consultees agree that all potentially significant effects that could arise from all stages of the Proposed Development have been identified in this section?

Yes

6.9.9.4 Do consultees agree on the suitability of the proposed commitments / mitigation measures?

Yes

6.9.9.5 Do consultees have any information regarding current or recent

archaeological work or projects being undertaken within or in the vicinity of the Site, particularly those whose results may not yet be recorded in the local HER datasets?

The Humber Carbon Capture Project is another NSIP that is related to this project, the data is not yet available on the HER, but reports should be available on the government website for NSIPs.

6.9.9.6 Do consultees have details of any cultural heritage sites in the vicinity of the Proposed Development which it considers may raise significant issues within the EIA process for the Proposed Development.

We consider the impact on the significance of the Grade I listed building of Paull Holme Tower and scheduled monument (NHLE 1007875 and 1366242) to be a specific item to consider. The tower is also on the Heritage at Risk register. The cumulative impact on the setting and structure of the designated heritage will need to be taken into account, as well as works directly associated with this proposed development.

6.11.9.4 Do consultees agree on the suitability of the proposed commitments / mitigation measures? We suggest taking into consideration how the historic environment and heritage assets can be enhanced to contribute to the socio-economic and socio-cultural elements of the proposed development and provide public benefits, as set out in the section above.

If you have any queries about any of the above, or would like to discuss anything further, please contact me.

Yours sincerely

[Redacted Signature]

Inspector of Ancient Monuments

[Redacted Email Address] historicengland.org.uk

**Fw: EN0710006 - Humber Hydrogen Pipeline - EIA Scoping and Consultation - response :
Holmpton Parish Council**

From [REDACTED]@planninginspectorate.gov.uk>

Date Mon 2026-06-29 14:57

To [REDACTED]@planninginspectorate.gov.uk>

 5 attachments (10 KB)

Outlook-r3fmawea.png; Outlook-2pr4mqes.png; Outlook-Logo, comp.png; Outlook-Icon Desc.png; Outlook-Icon Desc.png;



Planning Inspectorate
Arolygiaeth Gynllunio

[REDACTED], BA (Hons)

NSIP Assistant Case Officer
Planning Inspectorate

Direct Line: [REDACTED] | **Helpline:** 0303 444 5000

 @PINSgov  Planning Inspectorate  planninginspectorate.gov.uk

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From: [REDACTED]

Sent: Monday, June 22, 2026 09:47

To: Humber Hydrogen Pipeline

Cc: [REDACTED];

[REDACTED]@holmptonparishcouncil.gov.uk; [REDACTED]; clerk@holmptonparishcouncil.gov.uk

Subject: Fw: EN0710006 - Humber Hydrogen Pipeline - EIA Scoping and Consultation - response :
Holmpton Parish Council

You don't often get email from clerk@holmptonparishcouncil.gov.uk. [Learn why this is important](#)

Dear Mr Patten,

Holmpton Parish Council discussed the attached correspondence at their June 2026 meeting and have raised significant safety concerns regarding this new technology being based in a relatively remote area, whilst still being in close proximity to significant numbers of residents and schools.

The Council are aware of the Nel Hydrogen plant at Kjørbo, Norway which suffered a fire in June 2019 due to an assembly error involving a hydrogen tank and resulted in a further ten hydrogen filling stations, mainly in Norway, to be shut down. As hydrogen capture and storage is relatively new in the UK, have the key learning points from this incident, outlined by Geirmund Vislie in Sept 2019 - [PowerPoint Presentation](#) and in the Press Release at the time by CEO Nel ASA - Jon Andre Lokke - [PowerPoint-presentasjon](#) amongst others, been taken into consideration in the planning process, to eliminate risk as far as is possible? What is the UK doing to learn from the experience of Norway to ensure that mistakes are not able to be repeated? What measures have been taken to update current regulations to ensure the National Provisions and Controls are adequate for this new and more volatile technology?

How will the new controls be monitored and enforced on a day to day basis and how often will all safety requirements be reviewed to avoid environmental impacts should anything go wrong. The local residents have no faith in the current monitoring that should apparently be taking place on other sites based at Easington amongst others, but from information that can be accessed, this seems to be very intermittent. Will it be possible for the community to be involved in the monitoring or have access to the outcomes in a timely period?

The proposed site for the Development currently has two rural access road, one of which will have been severely compromised by coastal erosion by the time the development is expected to be operational. This will restrict the access for emergency services if required to attend site, should a fire / explosion occur. It will also impact on any evacuation of residents that may be required. How do the developers intend to deal with and counter this risk, whilst maintaining the beauty of the rural location?

There is already a large and growing industrial site at Easington which is in close proximity to the Spurn National Nature Reserve, one of Yorkshire Wildlife Trusts most iconic nature reserves, with its internationally famous bird migration, premier bird watching sites, diverse coastal habitats and historical interest. It is felt that any further industrial development must therefore carry out the most vigorous Environmental Impact Study and provide the greatest level of detail in their Environmental Statement, to deal with the array of concerns from those with an interest in the future of the area.

Further the site already creates a negative impact with light pollution. What additional lighting will be required at the expanded site and what steps will be taken to mitigate its impact to local residents and wildlife / migrating birds in the area?

The pipeline distribution system will cause destruction to significant swathes of agricultural land during the surveying and installation phases. Agricultural land in this area is already being lost to the sea and farmers cannot afford to lose more. What steps are the developers taking to limit this impact along the entire proposed line of the pipeline, given that it is anticipated that easy and constant access to the pipeline will be required for ongoing maintenance, to ensure its safety? How will the pipeline be protected to limit the possibility of fires / explosions along its route, which would adversely affect wildlife and local residents.

The proposed pipeline involves extensive lengths of pipes across a large part of the locality. What separate monitoring systems will be in place along it's entire length to provide adequate warning prior to any potential disasters?

We trust the above will be taken into consideration when outlining the Scoping Opinion by the Planning Inspectorate in response to the developers application and in any other aspects of the planning process.

Regards



Holmpton Parish Council



Marine
Management
Organisation

Marine Licensing
Tyneside House
Skinnerburn Road
Newcastle Business Park
Newcastle upon Tyne
NE4 7A

T +44 (0)300 123 1032
F +44 (0)191 376 2681
www.gov.uk/mmo

PINS reference: **EN0710006**

By email only

15 June 2026

Dear Sir/Madam,

RE: EN0710006 - Humber Hydrogen Pipeline - EIA Scoping Consultation and Notification

This letter is in response to the scoping opinion consultation request for the proposed Humber Hydrogen Pipeline, received by the Marine Management Organisation (MMO) on 22 May 2026.

After reviewing the submitted information, together with an enquiry made to the MMO by the applicant on 13 April 2026 (REF: ENQ/2026/00070), the MMO has concluded that the proposed project may fall within the scope of Section 35 (Bored Tunnels) of the Marine Licensing (Exempted Activities) Order 2011. As such, it may not fall within the MMO's regulatory jurisdiction. However, it remains the responsibility of the applicant to satisfy themselves that the proposed activities meet the criteria for this exemption.

Following this enquiry, no further engagement has been received from the applicant in relation to the DCO. On this basis, the MMO considers that no part of the proposed project falls within its regulatory jurisdiction. Accordingly, no further comments will be provided unless specifically requested by the Planning Inspectorate.

The MMO reserves the right to provide further comments on the project throughout the pre-application process and may revise its current advice or opinion in light of any additional information that comes to its attention. This representation is submitted without prejudice to any decision the MMO may make in relation to any associated application for consent, permission, approval, or other authorisation, either for works in the marine area or for any other relevant aspect of the proposed development.

If you require any further information, please do not hesitate to contact me using the details provided below.

Yours Sincerely,



INVESTORS
IN PEOPLE

Bronze





Marine Case Manager



[\[redacted\]@marinemanagement.org.uk](mailto:[redacted]@marinemanagement.org.uk)



Defence
Infrastructure
Organisation

Ministry of Defence
Safeguarding Department
DIO Head Office
St George's House
Whittington
Lichfield
Staffordshire
WS14 9PY

Planning ref: EN0710006

DIO ref: 10071017

██████████ : ██████████
E-mail: DIO-Safeguarding-
Statutory@mod.gov.uk

Jack Patten

Planning Inspectorate

By Email Only

16th June 2026

Dear Jack,

Re: Humber Hydrogen Transmission System Ltd (HHTS), is proposing to design, construct, operate and maintain, and ultimately decommission the Humber Hydrogen Pipeline (HPP) Project. The Proposed Development will consist of a hydrogen pipeline extending approximately 54 km in length, which will provide a strategic hydrogen transmission link between hydrogen producers, consumers and a storage facility.

Thank you for consulting the MOD on application reference EN0710006

The Defence Infrastructure Organisation (DIO) Safeguarding Team represents the Ministry of Defence (MOD) as a consultee in UK planning and energy consenting systems to ensure that development does not compromise or degrade the operation of defence sites such as aerodromes, explosives storage sites, air weapon ranges, and technical sites or training resources such as the Military Low Flying System.

I can confirm that, following review of the application documents, the proposed development would be considered to have no detrimental impact on the operation or capability of a defence site or asset. The MOD has no objection to the development proposed.

The MOD must emphasise that this email is provided specifically in response to the application documents and supporting information provided on the Planning Inspectorate website as of the date of this letter.

Amendments to any element of the proposed development (including the location, dimensions, form, and/or finishing materials of any structure) may significantly alter how the development relates to MOD safeguarding requirements and may result in detrimental impact(s) on the operation or capability of defence sites or assets.

In the event that any revised plans, amended plans, additional information or further application(s) are submitted for approval, the MOD, as a statutory consultee, should be consulted and provided with adequate time to carry out assessments and provide a formal response whether the proposed amendments are considered material or not by the determining authority.

I trust this is clear however should you have any questions please do not hesitate to contact me.

Yours sincerely

DIO Safeguarding Team

Submitted via email to: humberhydrogenpipeline@planninginspectorate.gov.uk

Date: 19th June 2026

Dear Sir/Madam,

Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) – Regulations 10 and 11

Application by Humber Hydrogen Transmission System Project (HHTS) Ltd (the Applicant) for an Order granting Development Consent for the Humber Hydrogen Pipeline (the Proposed Development)

I refer to your letter dated 22/05/2026 regarding the above proposed DCO. This is a response on behalf of National Gas Transmission PLC (NGT). Having reviewed the scoping consultation documents, NGT wishes to make the following comments regarding gas infrastructure which may be affected by proposals.

NGT has many feeder mains located within or in proximity to the Order limits. Details of this infrastructure is as follows:

- Feeder Main – FM22 – Goxhill to Hatton
- Feeder Main – FM09 – East Marsh Ln to Ulceby
- Feeder Main – FM01 – Skitter to Thornton Curtis (Decommissioned)
- Feeder Main – FM09 – Paull to East Marsh Ln
- Feeder Main – FM06 – Paull to Saltend
- Feeder Main – FM06 – Burton Agnes to Paull
- Feeder Main – FM19 – Easington to Paull
- Feeder Main – FM01 – Easington to Paull
- Feeder Main – FM09 – Easington to Paull
- Feeder Main – FM24 – Easington to Paull
- Feeder Main – FM06 – Rosehill Spur
- Feeder Main – FM06 – Sproatley to Rosehill
- Feeder Main – FM29 – Easington to Ganstead
- Feeder Main – FM09 – Easington to Dimlington
- Feeder Main – FM06 – Sproatley to Aldbrough
- NGT Freehold – YEA59315
- NGT Freehold – YEA14202

- NGT Leasehold – YEA3669
- Cathodic Protection Groundbeds/TR
- Ancillary apparatus

Please note that NGT has existing rights for these pipelines which provides rights for ongoing access and prevents the erection of permanent / temporary buildings / structures, change to existing ground levels or storage of materials etc within the easement strip.

Where the Promoter intends to acquire land, extinguish rights, or interfere with any of NGT's apparatus, NGT will require appropriate protection and further discussion on the impact to its apparatus and rights including adequate Protective Provisions. A Deed of Consent will also be required for any works proposed within the easement strip.

General Pipeline Information

NGT requires its pipelines remain accessible during and after completion of any works. Some work types have specific restrictions when being undertaken in the vicinity of gas assets, therefore, early consultation with NGT is essential.

General information Promoters should be aware of is contained in *UKOPA GPG/042 - Guidance on the Issues to be Considered by Promoters, Designers and Planners of New Developments in the Vicinity of High Pressure Pipelines* [Good Practice Guide](#).

Our pipelines are normally buried to a depth cover of 1.1 metres, however actual depth and position must be confirmed on site by trial hole investigation under the supervision of an NGT representative. Ground cover above our pipelines should not be reduced or increased. Further guidance around working safely may be sought from NGT and additional specifications provided where required.

Any works within the vicinity of NGT's pipelines must adhere to the safe working requirements set out in [T/SP/SSW/22](#).

If any excavations are planned within a pipeline's easement, or within 10 metres (whichever is higher), or within 10 metres of an Above Ground Installation (AGI), or if any embankment or dredging works are proposed, then the actual position and depth of the pipeline must be established on site in the presence of a NGT representative. A safe working method must be agreed prior to any work taking place to minimise the risk of damage and ensure the final depth of cover does not affect the integrity of the pipeline.

Any large installations which may result in a population increase in the vicinity of a high pressure gas pipeline must comply with the HSE's Land Use Planning (LUP) methodology, and the HSE response should be submitted to NGT for review. NGT will typically support the HSE's advice, however, the HSE's LUP methodology differs from IGEM risk assessment methodology and as such, the pipeline operating conditions / specifications and the formation of a population cluster and / or increased population density near the pipeline as a result of development, may provide

sufficient reasons on safety grounds for NGT to request that the Promoter / Developer conducts a risk assessment in form of a Quantitative Risk Assessment (QRA). The QRA must be completed by a specialist company approved to carry out these assessments for NGT.

Pipelines and Buried Services

There is specific criteria that must be adhered to for developing electrical infrastructure near NGT's pipelines to avoid unacceptable levels of interference.

Utility crossings over NGT's pipelines are restricted and require formal written permission in the form of a Deed of Consent before any installation / construction within the pipeline easement is permitted.

The Promoter is to engage with NGT for further guidance in the early stages of design to ensure the required integrity assessments are agreed, and consideration has been given to electrical interference, security, crossing points, future access and safe construction methods, all of which must be mutually agreed prior to undertaking any works on site.

Pipelines must cross NGT's pipeline as close to perpendicular as possible to limit the risk of interference. A new pipeline must not be laid parallel within NGT's easement strip. The separation distance for a pipeline is 1000mm. However, trenchless installation techniques may increase the required separation to be further.

Yours faithfully,



DCO Liaison Officer

Lead Development Liaison Officer
[REDACTED]@nationalgrid.com

Support Officer
[REDACTED]@nationalgrid.com

Customer Connections Site Solutions (CCSS)
Land, Planning and External Affairs (LPEA)
National Grid Electricity Transmission (NGET)
www.nationalgrid.com

SUBMITTED ELECTRONICALLY:
humberhydrogenpipeline@planninginspectorate.gov.uk

17 June 2026

Dear Sir/Madam

RE: APPLICATION BY Humber Hydrogen Transmission System Ltd (THE APPLICANT) FOR AN ORDER GRANTING DEVELOPMENT CONSENT FOR THE Humber Hydrogen Pipeline (THE PROPOSED DEVELOPMENT)

SCOPING CONSULTATION RESPONSE

We refer to your letter dated 22nd May 2026 in relation to the above proposed application. This is a response on behalf of National Grid Electricity Transmission PLC (NGET).

Having reviewed the scoping report, I would like to make the following comments regarding NGET existing or future infrastructure in close proximity to the current red line boundary.

NGET has high voltage electricity substations and overhead transmission lines within close proximity the scoping area. The overhead lines form an essential part of the electricity transmission network in England and Wales.

Existing Infrastructure

Substation

- Saltend North 132KV Substation
- Saltend South 275KV Substation
- Hedon 275kv Substation

Associated overhead and underground apparatus including cables

Overhead Lines

YYW ROUTE 275 kV OHL

CREYKE BECK - SALT END NORTH
CREYKE BECK – HEDON

We enclose plans showing the location of NGET's apparatus in the scoping area.

In addition, GIS shapefiles of approximate locations of our national electricity transmission network are freely available from here: <https://www.nationalgrid.com/electricity-transmission/network-and-infrastructure/network-route-maps>. You can also check if your works will affect our transmission network by using the Line search website: <https://lsbud.co.uk/>.

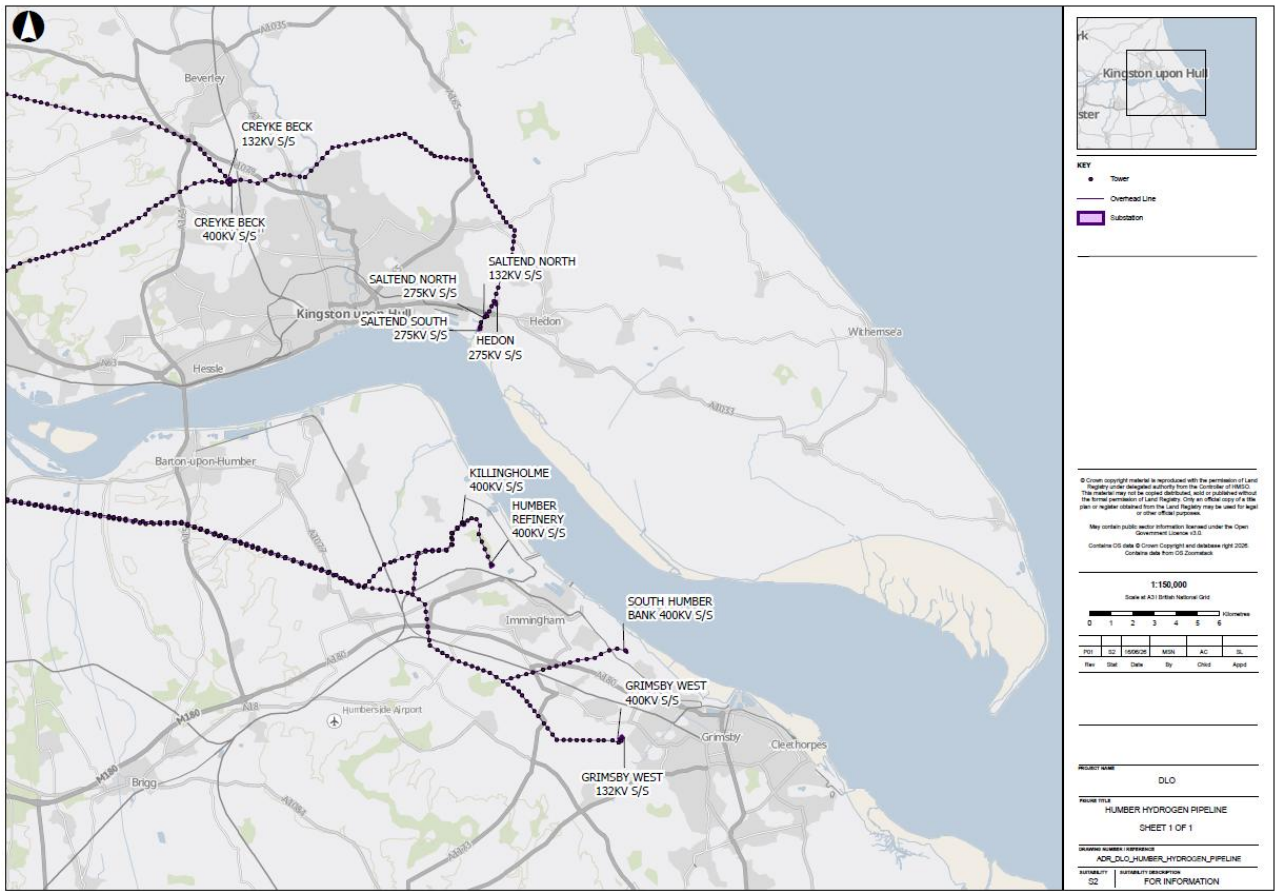


Figure 1: NGET Assets in proposed development area

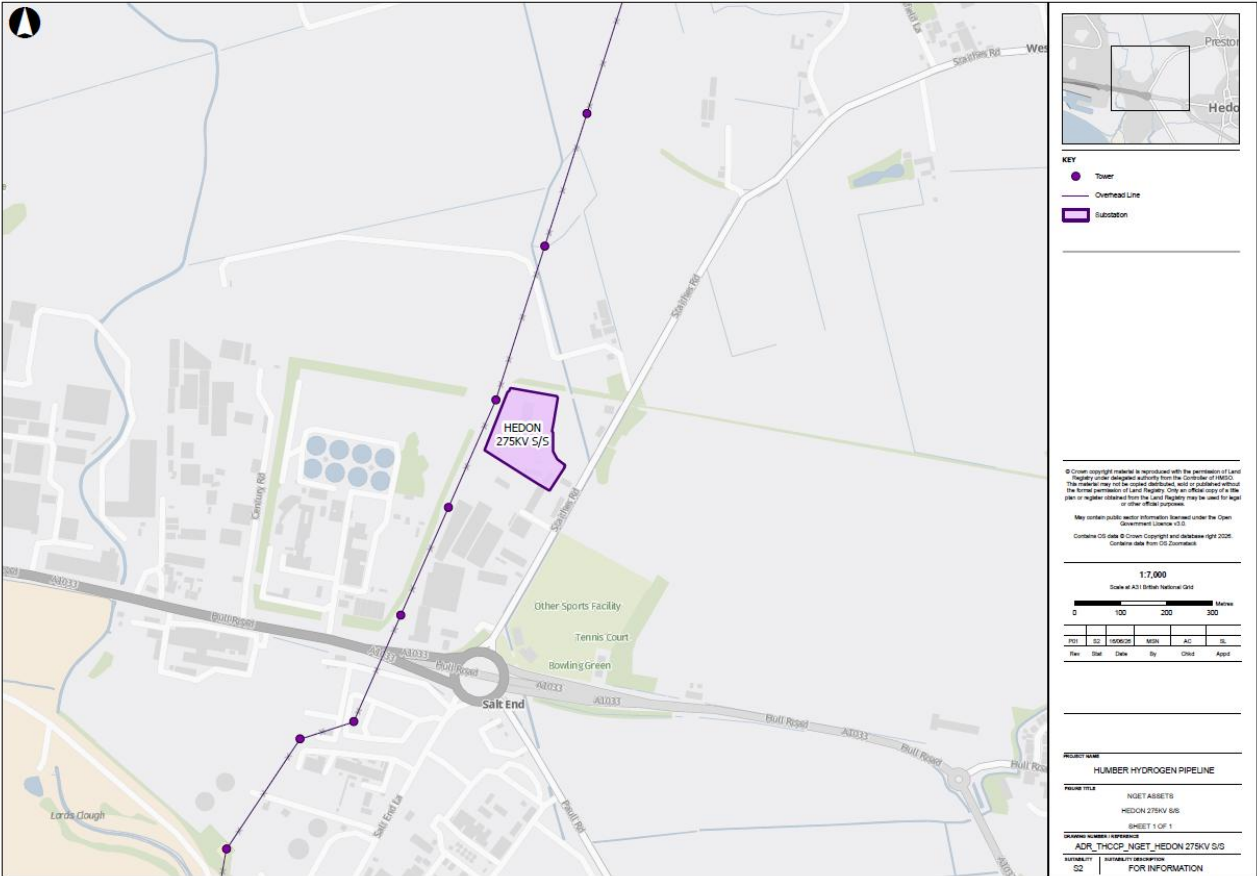


Figure 2: NGET’S Hedon 275kv Substation

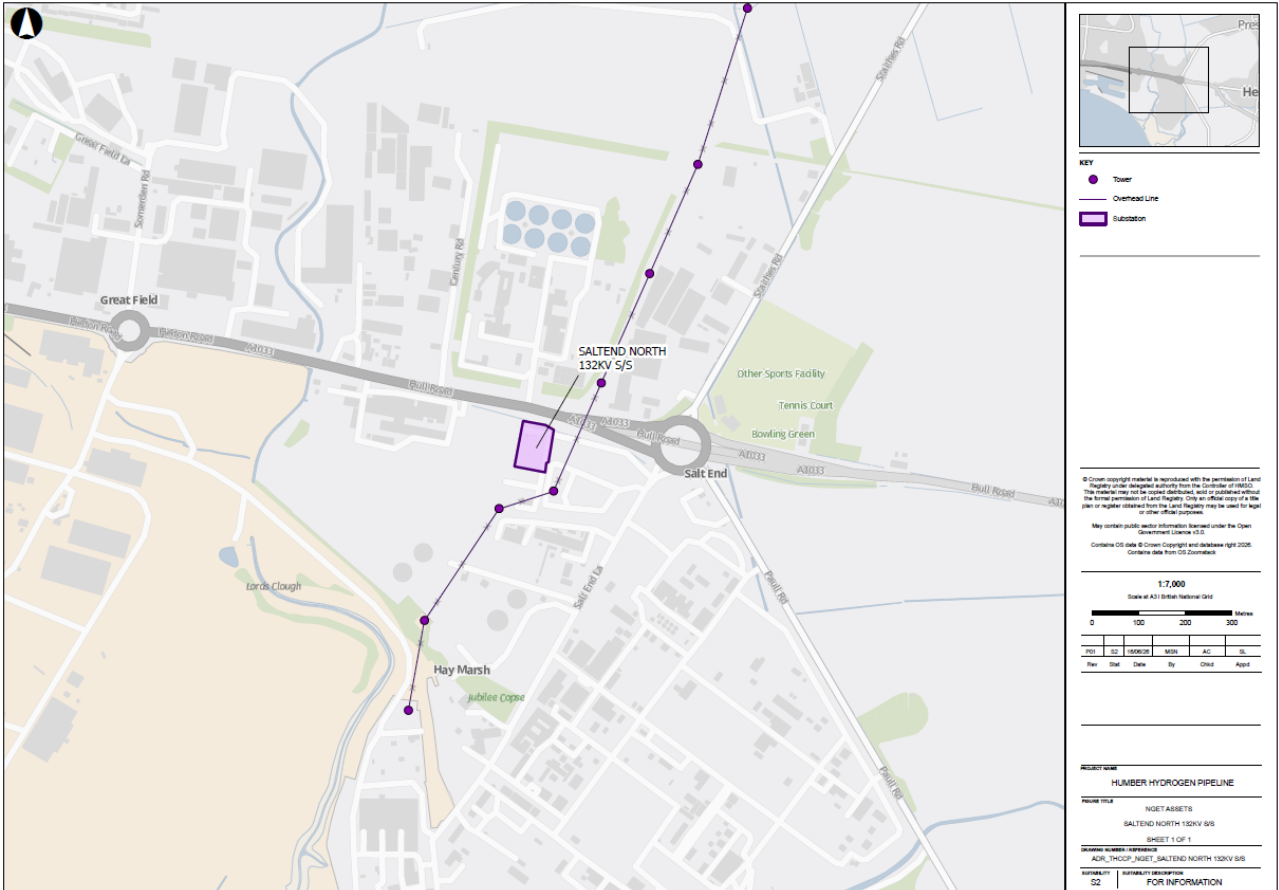


Figure 3: NGET's Saltend North 132KV Substation

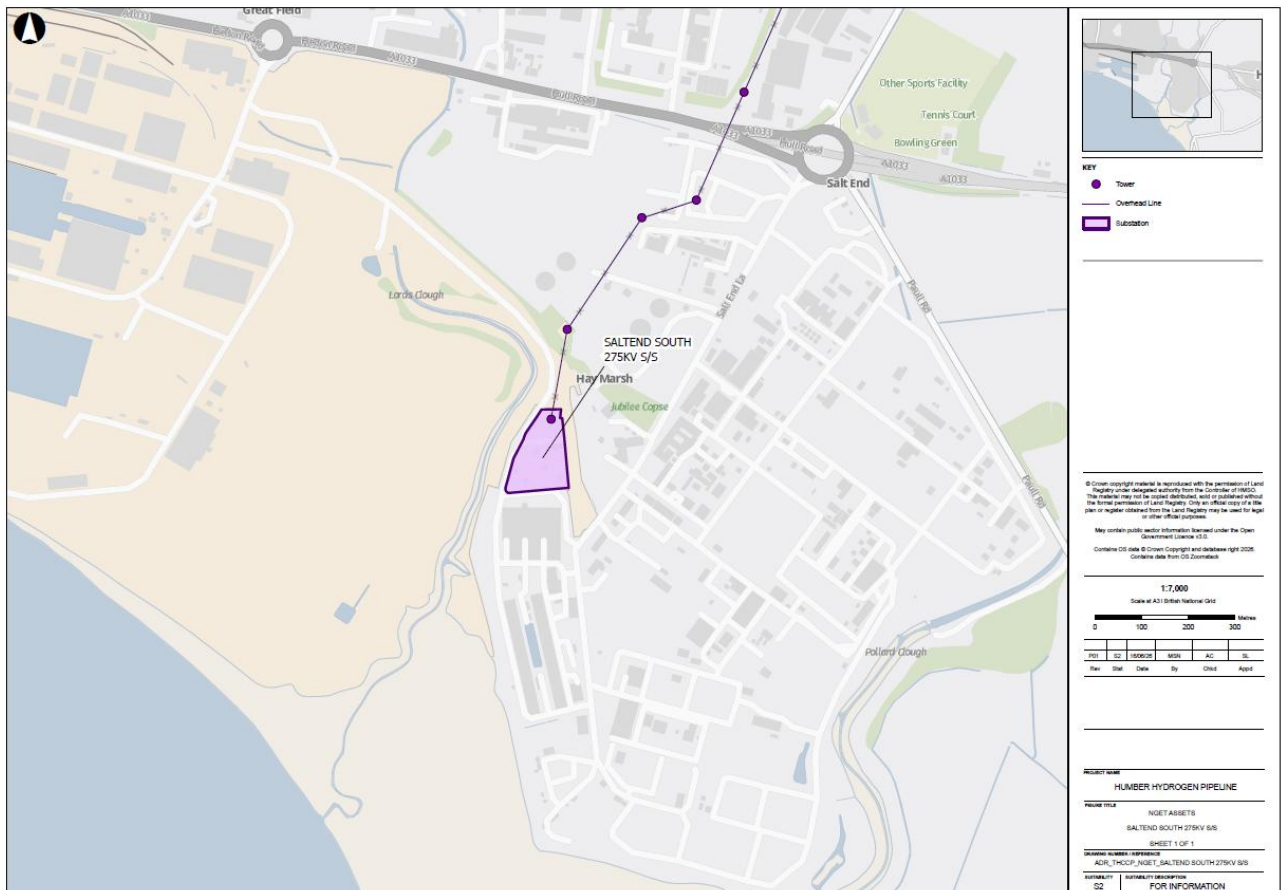


Figure 4: NGET's Saltend South 275KV Substation

New infrastructure

The National Energy System Operator (NESO) took over the electricity network planning responsibility from National Grid Electricity System Operator Limited (NGESO) on the 1st October 2024. Please consult with NESO separately from NGET where further information on the strategic need or capacity is sought.

Please refer to the Holistic Network Design (HND) and the NESO website to view the strategic vision for the UK's ever growing electricity transmission network: <https://www.neso.energy/publications/beyond-2030/holistic-network-design-offshore-wind>; and <https://www.neso.energy/publications/beyond-2030>

Onshore Infrastructure

It should be noted that there may be further interactions with additional new strategic infrastructure where the projects are in their early development.

NGET requests that all existing and future assets are given due consideration given their criticality to the high-voltage transmission of electricity across the UK. We remain committed to working with the promoter in a proactive manner, enabling both parties to deliver successful projects wherever reasonably possible. As such we encourage that ongoing discussion and consultation between both parties is maintained on interactions with existing or future assets, land interests, connections or consents and any other NGET interests which have the potential to be impacted prior to submission of the Proposed DCO.

The Great Grid Upgrade is the largest overhaul of the electricity grid in generations, we are in the middle of a transformation, with the energy we use increasingly coming from cleaner greener sources. Our infrastructure projects across England and Wales are helping to connect more renewable energy to homes and businesses. To find out more about our current projects please refer to our network and infrastructure webpage. <https://www.nationalgrid.com/electricity-transmission/network-and-infrastructure/infrastructure->

projects. Where it has been identified that your project interacts with or is in close proximity to one of NGET's infrastructure projects, we would welcome further discussion at the earliest opportunity.

These projects are all essential to increase the overall network capability to connect the numerous new offshore wind farms that are being developed, and transport new clean green energy to the homes and businesses where it is needed.

The following points should be taken into consideration.

Specific Comments – Electricity Infrastructure:

- NGET's Overhead Line/s is protected by a Deed of Easement/Wayleave Agreement which provides full right of access to retain, maintain, repair and inspect our asset
- Statutory electrical safety clearances must be maintained at all times. Any proposed buildings must not be closer than 5.3m to the lowest conductor. NGET recommends that no permanent structures are built directly beneath overhead lines. These distances are set out in EN 43 – 8 Technical Specification for “overhead line clearances Issue 5 (2019)”.
- If any changes in ground levels are proposed either beneath or in close proximity to our existing overhead lines, then this would serve to reduce the safety clearances for such overhead lines. Safe clearances for existing overhead lines must be maintained in all circumstances.
- The relevant guidance in relation to working safely near to existing overhead lines is contained within the Health and Safety Executive's (www.hse.gov.uk) Guidance Note GS 6 “Avoidance of Danger from Overhead Electric Lines” and all relevant site staff should make sure that they are both aware of and understand this guidance.
- Plant, machinery, equipment, buildings or scaffolding should not encroach within 5.3 metres of any of our high voltage conductors. When those conductors are under their worst conditions of maximum “sag” and “swing” and overhead line profile (maximum “sag” and “swing”) drawings should be obtained using the contact details above.
- If a landscaping scheme is proposed as part of the proposal, we request that only slow and low growing species of trees and shrubs are planted beneath and adjacent to the existing overhead line to reduce the risk of growth to a height which compromises statutory safety clearances.
- Drilling or excavation works should not be undertaken if they have the potential to disturb or adversely affect the foundations or “pillars of support” of any existing tower. These foundations always extend beyond the base area of the existing tower and foundation (“pillar of support”) drawings can be obtained using the contact details above.
- NGET high voltage underground cables are protected by a Deed of Grant; Easement; Wayleave Agreement or the provisions of the New Roads and Street Works Act. These provisions provide NGET full right of access to retain, maintain, repair and inspect our assets. Hence, we require that no permanent / temporary structures are to be built over our cables or within the easement strip. Any such proposals should be discussed and agreed with NGET prior to any works taking place.
- Ground levels above our cables must not be altered in any way. Any alterations to the depth of our cables will subsequently alter the rating of the circuit and can compromise the reliability, efficiency and safety of our electricity network and requires consultation with National Grid prior to any such changes in both level and construction being implemented.

Further Advice

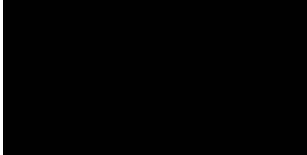
NGET requests to be consulted at the earliest stages to ensure that the most appropriate protective provisions are included within the DCO application to safeguard the integrity of our apparatus and to remove

the requirement for objection. All consultations should be sent to the following email address:
box.landandacquisitions@nationalgrid.com

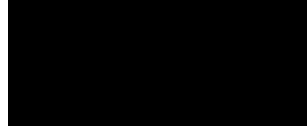
We hope the above information is useful. If you require any further information, please do not hesitate to contact the Land Development Liaison team. In the meantime, we look forward to receipt of further information and consultation relating to potential impacts on our assets.

The information in this letter is provided notwithstanding any discussions taking place in relation to connections with electricity customer services.

Yours faithfully,



Lead Development Liaison Officer
Customer Connections Site Solutions (CCSS)
Land, Planning and External Affairs (LPEA)



Development Liaison Support Officer
Customer Connections Site Solutions (CCSS)
Land, Planning and External Affairs (LPEA)

Technical Guidance Note 287

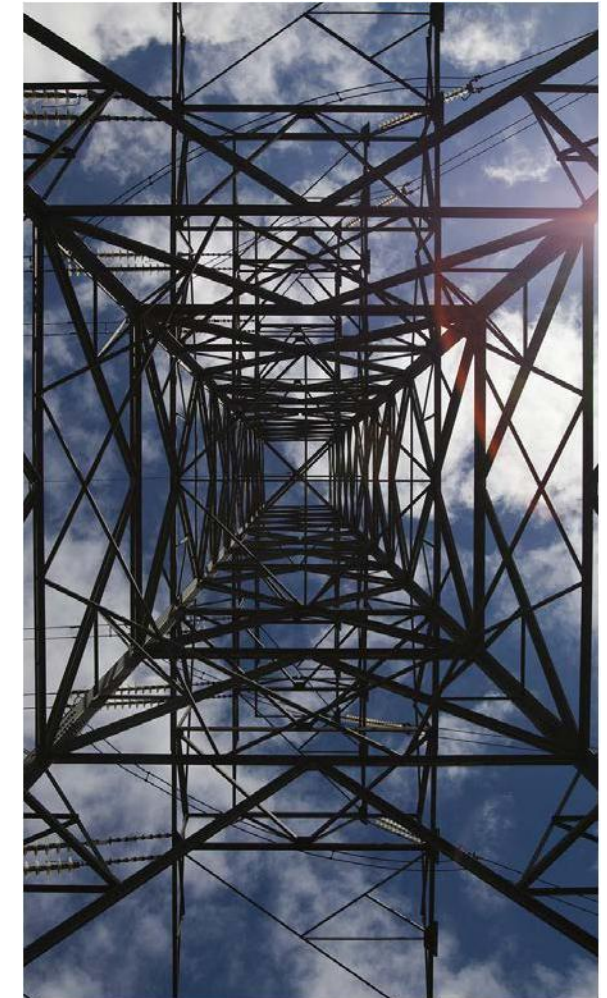
Third-party guidance for working near National Grid Electricity Transmission equipment

nationalgrid





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Disclaimer

National Grid Gas Transmission and National Grid Electricity Transmission or their agents, servants or contractors do not accept any liability for any losses arising under or in connection with this information. This limit on liability applies to all and any claims in contract, tort (including negligence), misrepresentation (excluding fraudulent misrepresentation), breach of statutory duty or otherwise. This limit on liability does not exclude or restrict liability where prohibited by the law, nor does it supersede the express terms of any related agreements.



Purpose and scope

The purpose of this document is to give guidance and information to third parties who are proposing, scheduling or designing developments close to National Grid Electricity Transmission assets.

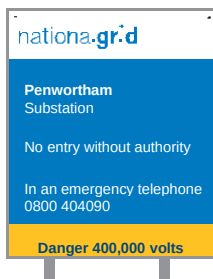
The scope of the report covers information on basic safety and the location of our assets – and also highlights key issues around particular types of development and risk areas.

In the case of electrical assets, National Grid does not authorise or agree safe systems of work with developers and contractors. However, we will advise on issues such as electrical safety clearances and the location of towers and cables. We also work with developers to minimise the impact of any National Grid assets that are nearby.

How to identify specific National Grid sites

Substations

The name of the Substation and emergency contact number will be on the site sign.



Overhead Lines

The reference number of the tower and the emergency contact number will be on this type of sign.



Contact National Grid

Plant protection

For routine enquiries regarding planned or scheduled works, contact the Asset Protection team online, by email or phone.

www.lsbud.co.uk

Email: assetprotection@nationalgrid.com

Phone: 0800 001 4282

Emergencies

In the event of occurrences such as a cable strike, coming into contact with an overhead line conductor or identifying any hazards or problems with National Grid's equipment, phone our emergency number 0800 404 090 (option 1).

If you have apparatus within 30m of a National Grid asset, please ensure that the emergency number is included in your site's emergency procedures.

Consider safety

Consider the hazards identified in this document when working near electrical equipment



Part 1

Electricity transmission infrastructure

National Grid owns and maintains the high-voltage electricity transmission network in England and Wales (Scotland has its own networks). It's responsible for balancing supply with demand on a minute-by-minute basis across the network.

Overhead lines

Overhead lines consist of two main parts – pylons (also called towers) and conductors (or wires). Pylons are typically steel lattice structures mounted on concrete foundations. A pylon's design can vary due to factors such as voltage, conductor type and the strength of structure required.

Conductors, which are the 'live' part of the overhead line, hang from pylons on insulators. Conductors come in several different designs depending on the amount of power that is transmitted on the circuit.

In addition to the two main components, some Overhead Line Routes carry a Fibre Optic cable between the towers with an final underground connection to the Substations.

In most cases, National Grid's overhead lines operate at 275kV or 400kV.

Underground cables

Underground cables are a growing feature of National Grid's network. They consist of a conducting core surrounded by layers of insulation and armour. Cables can be laid in the road, across open land or in tunnels. They operate at a range of voltages, up to 400kV.

Substations

Substations are found at points on the network where circuits come together or where a rise or fall in voltage is required. Transmission substations tend to be large facilities containing equipment such as power transformers, circuit breakers, reactors and capacitors. In addition Diesel generators and compressed air systems can be located there.

Part 2

Statutory requirements for working near high-voltage electricity

The legal framework that regulates electrical safety in the UK is *The Electricity Safety, Quality and Continuity Regulations (ESQCR) 2002*. This also details the minimum electrical safety clearances, which are used as a basis for the Energy Networks Association (ENA) TS 43-8. These standards have been agreed by CENELEC (European Committee for Electrotechnical Standardisation) and also form part of the *British Standard BS EN 50341-1:2012 Overhead Electrical Lines exceeding AC 1kV*. All electricity companies are bound by these rules, standards and technical specifications. They are required to uphold them by their operator's licence.

Electrical safety clearances

It is essential that a safe distance is kept between the exposed conductors and people and objects when working near National Grid's electrical assets. A person does not have to touch an exposed conductor to get a life-threatening

electric shock. At the voltages National Grid operates at, it is possible for electricity to jump up to several metres from an exposed conductor and kill or cause serious injury to anyone who is nearby. For this reason, there are several legal requirements and safety standards that must be met.

Any breach of legal safety clearances will be enforced in the courts. This can and has resulted in the removal of an infringement, which is normally at the cost of the developer or whoever caused it to be there. Breaching safety clearances, even temporarily, risks a serious incident that could cause serious injury or death.

National Grid will, on request, advise planning authorities, developers or third parties on any safety clearances and associated issues. We can supply detailed drawings of all our overhead line assets marked up with relevant safe areas.



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Your Responsibilities - Overhead lines

Work which takes place near overhead power lines carries a significant risk of coming into proximity with the wires. If any person, object or material gets too close to the wires, electricity could 'flashover' and be conducted to earth, causing death or serious injury. You do not need to touch the wires for this to happen. The law requires that work is carried out in close proximity to live overhead power lines only when there is no alternative, and only when the risks are acceptable and can be properly controlled. Statutory clearances exist which must be maintained, as prescribed by the Electricity Safety, Quality and Continuity Regulations 2002.

Under the Health and Safety at Work etc. Act 1974 and Management of Health and Safety at Work Regulations 1999, you are responsible for preparing a suitable and sufficient risk assessment and safe systems of work, to ensure that risks are managed properly and the safety of your workforce and others is maintained. Your risk assessment must consider and manage all of the significant risks and put in place suitable precautions/controls in order to manage the work safely. You are also responsible for ensuring that the precautions identified are properly implemented and stay in place throughout the work.

Work near overhead power lines must always be conducted in accordance with GS6, 'avoiding danger from overhead power lines', and any legislation which is relevant to the work you are completing.

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What National Grid will provide

National Grid can supply profile drawings in PDF and CAD format showing tower locations and relevant clearances to assist you in the risk assessment process.

What National Grid will not provide

National Grid will not approve safe systems of work or approve design proposals

Part 3

What National Grid will do for you and your development

Provision of information

National Grid should be notified during the planning stage of any works or developments taking place near our electrical assets, ideally a minimum notification period of 8 weeks to allow National Grid to provide the following services:

Drawings

National Grid will provide relevant drawings of overhead lines or underground cables to make sure the presence and location of our services are known. Once a third party or developer has contacted us, we will supply the drawings for free.

400kV

The maximum nominal voltage of the underground cables in National Grid's network

Risk or impact identification

National Grid can help identify any hazards or risks that the presence of our assets might bring to any works or developments. This includes both the risk to safety from high-voltage electricity and longer-term issues, such as induced currents, noise and maintenance access that may affect the outcome of the development. National Grid will not authorise specific working procedures, but we can provide advice on best practice.





Risks or hazards to be aware of

This section includes a brief description of some of the hazards and issues that a third party or developer might face when working or developing close to our electrical infrastructure.

Land and access

National Grid has land rights in place with landowners and occupiers, which cover our existing overhead lines and underground cable network. These agreements, together with legislation set out under the *Electricity Act 1989*, allow us to access our assets to maintain, repair and renew them. The agreements also lay down restrictions and covenants to protect the integrity of our assets and meet safety regulations. Anyone proposing a development close to our assets should carefully examine these agreements.

Our agreements often affect land both inside and outside the immediate vicinity of an asset. Rights will include the provision of access, along with restrictions that ban the development of land through building, changing levels, planting and other operations. Anyone looking to develop close to our assets must consult with National Grid first.

For further information, contact Asset Protection:

Email: assetprotection@nationalgrid.com
Phone: 0800 001 4282

Electrical clearance from overhead lines

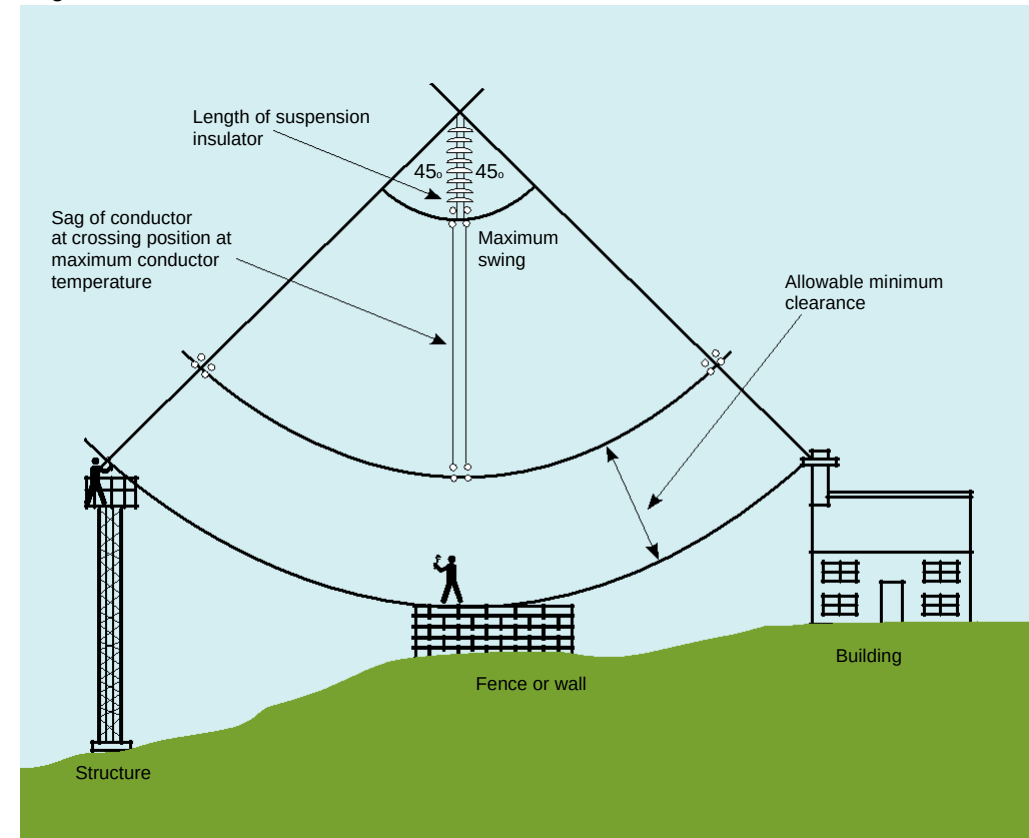
The clearance distances referred to in this section are specific to 400kV overhead lines. National Grid can advise on the distances required around different voltages i.e. 132kV and 275kV.

As we explained earlier, *Electrical Networks Association TS 43-8* details the legal clearances to our overhead lines. The minimum clearance between the conductors of an overhead line and the ground is 7.3m at maximum sag. The sag is the vertical distance between the wire's highest and lowest point. Certain conditions, such as power flow, wind speed and air temperature can cause conductors to move and allowances should be made for this.

The required clearance from the point where a person can stand to the conductors is 5.3m. To be clear, this means there should be at least 5.3m from where someone could stand on any structure (i.e. mobile and construction equipment) to the conductors. Available clearances will be assessed by National Grid on an individual basis.

National Grid expects third parties to implement a safe system of work whenever they are near Overhead Lines.

Diagram not to scale



There should be at least 5.3m between the conductors and any structure someone could stand on

We recommend that guidance such as *HSE Guidance Note GS6 (Avoiding Danger from Overhead Power Lines)* is followed, which provides advice on how to avoid danger from all overhead lines, at all voltages. If you are carrying out work near overhead lines you must contact National Grid, who will provide the relevant profile drawings.

7.3m

The required minimum clearance between the conductors of an overhead line, at maximum sag, and the ground

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The undergrounding of electricity cables at Ross-on-Wye

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Underground cables Underground cables operating at up to 400kV are a significant part of the National Grid Electricity Transmission network. When your works will involve any ground disturbance it is expected that a safe system of work is put in place and that you follow guidance such as *HSG 47 (Avoiding Danger from Underground Services)*.

You must contact National Grid to find out if there are any underground cables near your proposed works. If there are, we will provide cable profiles and location drawings and, if required, on-site supervision of the works. Cables can be laid under roads or across industrial or agricultural land. They can even be laid in canal towpaths and other areas that you would not expect.

Cables crossing any National Grid high-voltage (HV) cables directly buried in the ground are required to maintain a minimum separation that will be determined by National Grid on a case-by-case basis. National Grid will need to do a rating study on the existing cable to work out if there are any adverse effects on either cable rating. We will only allow a cable to cross such an area once we know the results of the re-rating. As a result, the clearance distance may need to be increased or alternative methods of crossing found.

For other cables and services crossing the path of our HV cables, National Grid will need confirmation that published standards and clearances are met.

Impressed voltage

Any conducting materials installed near high-voltage equipment could be raised to an elevated voltage compared to the local earth, even when there is no direct contact with the high-voltage equipment. These impressed voltages are caused by inductive or capacitive coupling between the high-voltage equipment and nearby conducting materials and can occur at distances of several metres away from the

equipment. Impressed voltages may damage your equipment and could potentially injure people and animals, depending on their severity. Third parties should take impressed voltages into account during the early stages and initial design of any development, ensuring that all structures and equipment are adequately earthed at all times.

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Earth potential rise

Under certain system fault conditions – and during lightning storms – a rise in the earth potential from the base of an overhead line tower or substation is possible. This is a rare phenomenon that occurs when large amounts of electricity enter the earth. This can pose a serious hazard to people or equipment that are close by.

We advise that developments and works are not carried out close to our tower bases, particularly during lightning storms.

Noise

Noise is a by-product of National Grid's operations and is carefully assessed during the planning and construction of any of our equipment. Developers should consider the noise emitted from National Grid's sites or overhead lines when planning any developments, particularly housing. Low-frequency hum from substations can, in some circumstances, be heard up to 1km or more from the site, so it is essential that developers find adequate solutions for this in their design. Further information about likely noise levels can be provided by National Grid.

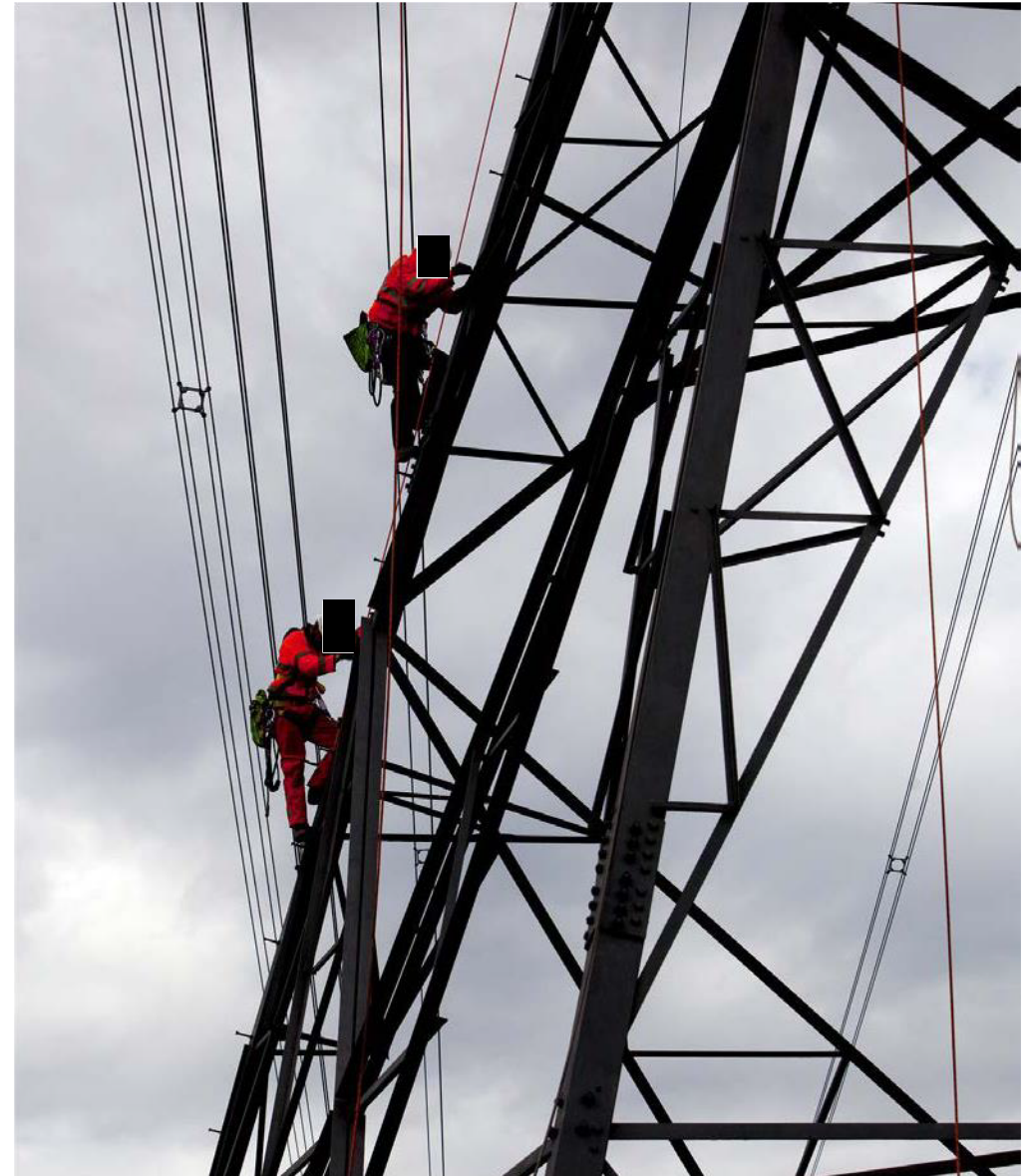
Maintenance access

National Grid needs to have safe access for vehicles around its assets and work that restricts this will not be allowed. In terms of our overhead lines, we wouldn't want to see any excavations made, or permanent structures built, that might affect the foundations of our towers. The size of the foundations around a tower base depends on the type of tower that is built there. If you wish to carry out works within 30m of the tower base, contact National Grid for more information. Our business has to maintain access routes to tower bases with land owners. For that reason, a route wide enough for an HGV must be permanently available. We may need to access our sites, towers, conductors and underground cables at short notice.

30m

If you wish to carry out work within this distance of the tower base, you must contact National Grid for more information

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Fires and firefighting

National Grid does not recommend that any type of flammable material is stored under overhead lines. Developers should be aware that in certain cases the local fire authority will not use water hoses to put out a fire if there are live, high-voltage conductors within 30m of the seat of the fire (*as outlined in ENA TS 43-8*).

In these situations, National Grid would have to be notified and reconfigure the system – to allow staff to switch out the overhead line – before any firefighting could take place. This could take several hours.

We recommend that any site which has a specific hazard relating to fire or flammable material should include National Grid's emergency contact details (found at the beginning and end of this document) in its fire plan information, so any incidents can be reported.

Developers should also make sure their insurance cover takes into account the challenge of putting out fires near our overhead lines.

Excavations, piling or tunnelling

You must inform National Grid of any works that have the potential to disturb the foundations of our substations or overhead line towers. This will have to be assessed by National Grid engineers before any work begins.

BS ISO 4866:2010 states that a minimum distance of 200m should be maintained when carrying out quarry blasting near our assets. However, this can be reduced with specific site surveys and changes to the maximum instantaneous charge (the amount of explosive detonated at a particular time).

All activities should observe guidance layed out in *BS 5228-2:2009*.

Microshocks

High-voltage overhead power lines produce an electric field. Any person or object inside this field that isn't earthed picks up an electrical charge. When two conducting objects – one that is grounded and one that isn't – touch, the charge can equalise and cause a small shock, known as a microshock. While they are not harmful, they can be disturbing for the person or animal that suffers the shock.

For these reasons, metal-framed and metal-clad buildings which are close to existing overhead lines should be earthed to minimise the risk of microshocks. Anything that isn't earthed, is conductive and sits close to the lines is likely to pick up a charge. Items such as deer fences, metal palisade fencing, chain-link fences and metal gates underneath overhead lines all need to be earthed.

For further information on microshocks please visit www.emfs.info.



200m

*The minimum distance that
should be maintained from
National Grid assets when
quarry blasting*



Specific development guidance

Wind farms

National Grid's policy towards wind farm development is closely connected to the *Electricity Networks Association Engineering Recommendation L44 Separation between Wind Turbines and Overhead Lines, Principles of Good Practice*. The advice is based on national guidelines and global research. It may be adjusted to suit specific local applications.

There are two main criteria in the document:

- (i) The turbine shall be far enough away to avoid the possibility of toppling onto the overhead line
- (ii) The turbine shall be far enough away to avoid damage to the overhead line from downward wake effects, also known as turbulence

The toppling distance is the minimum horizontal distance between the worst-case pivot point of the wind turbine and the conductors hanging in still air. It is the greater of:

- the tip height of the turbine plus 10%
- or, the tip height of the turbine plus the electrical safety distance that applies to the voltage of the overhead line.

To minimise the downward wake effect on an overhead line, the wind turbine should be three times the rotor distance away from the centre of the overhead line.

Wake effects can prematurely age conductors and fittings, significantly reducing the life of the asset. For that reason, careful consideration should be taken if a wind turbine needs to be sited within the above limits. Agreement from National Grid will be required.

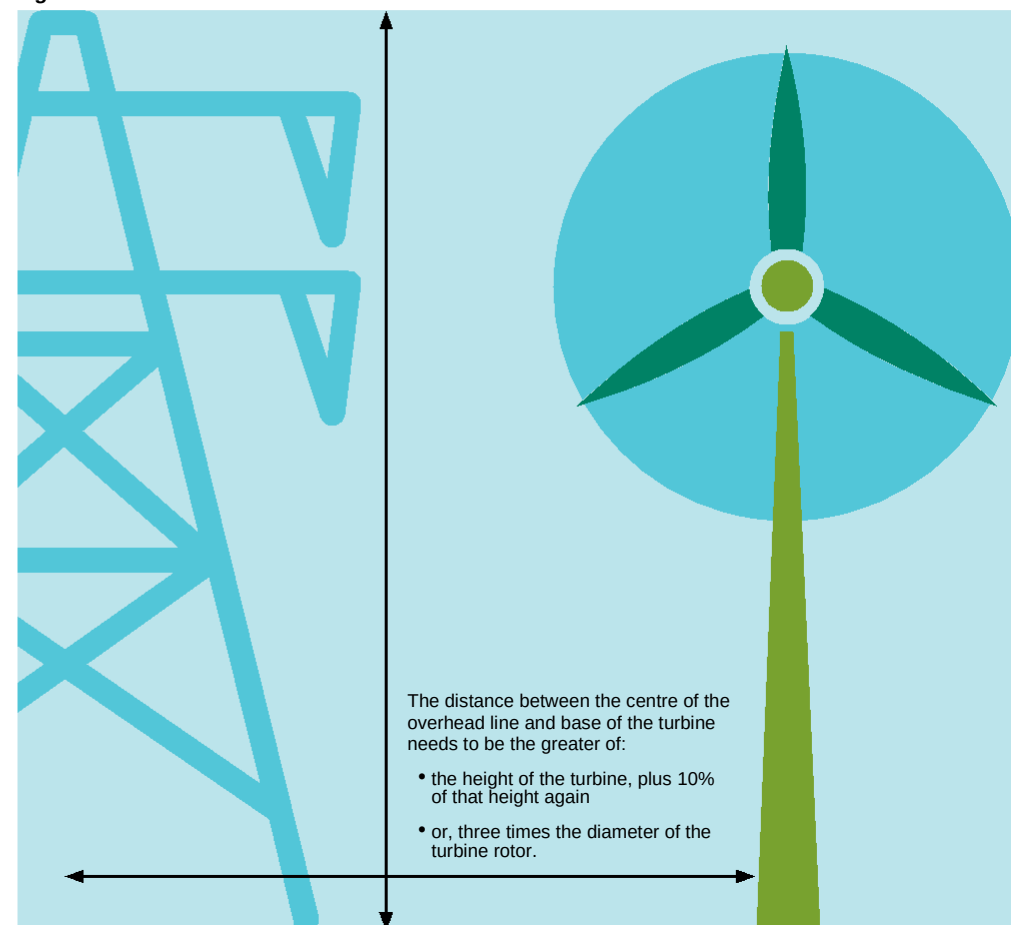
Commercial and housing developments

National Grid has developed a document called *Design guidelines for development near pylons and HVO power lines*, which gives advice to anyone involved in planning or designing large-scale developments that are crossed by, or close to, overhead lines.

The document focuses on existing 275kV and 400kV overhead lines on steel lattice towers, but can equally apply to 132kV and below. The document explains how to design large-scale developments close to high-voltage lines, while respecting clearances and the development's visual and environmental impact.

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Diagram not to scale



Turbines should be far enough away to avoid the possibility of toppling onto the overhead line



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The advice is intended for developers, designers, landowners, local authorities and communities, but is not limited to those organisations.

Overall, developers should be aware of all the hazards and issues relating to the electrical equipment that we have discussed when designing new housing.

As we explored earlier, National Grid's assets have the potential to create noise. This can be low frequency and tonal, which makes it quite noticeable. It is the responsibility of developers to take this into account during the design stage and find an appropriate solution.

Solar farms

While there is limited research and recommendations available, there are several key factors to consider when designing Solar Farms in the vicinity of Overhead Power Lines.

Developers may be looking to build on arable land close to National Grid's assets. In keeping with the safety clearance limits that we outlined earlier for solar panels directly underneath overhead line conductors, the highest point on the solar panels must be no more than 5.3m from the lowest conductors.

This means that the maximum height of any structure will need to be determined to make sure safety clearance limits aren't breached. This could be as low as 2m. National Grid will supply profile drawings to aid the planning of solar farms and determine the maximum height of panels and equipment.

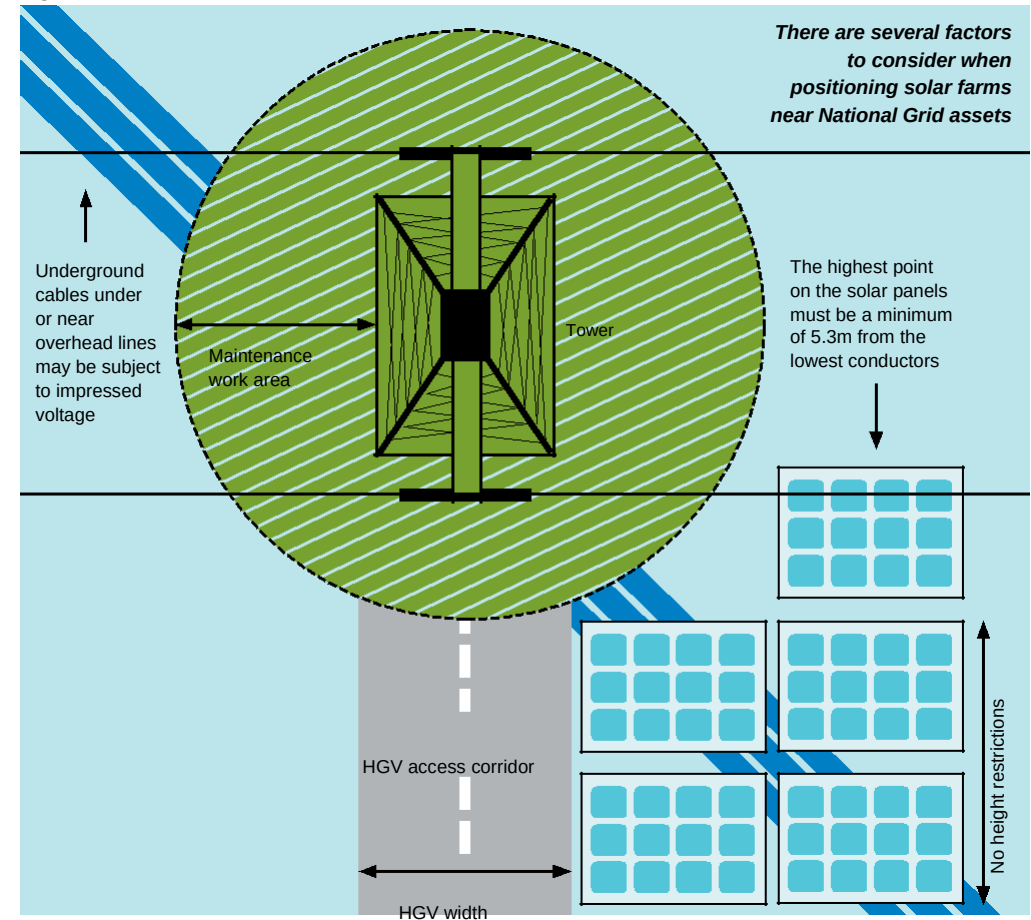
Solar panels that are directly underneath power lines risk being damaged on the rare occasion that a conductor or fitting falls to the ground. A more likely risk is ice falling from conductors or towers in winter and damaging solar panels.

There is also a risk of damage during adverse weather conditions, such as lightning storms, and system faults. As all our towers are earthed, a weather event such as lightning can cause a rise in the earth potential around the base of a tower. Solar panel support structures and supply cables should be adequately earthed and bonded together to minimise the effects of this temporary rise in earth potential.

Any metallic fencing that is located under an overhead line will pick up an electrical charge. For this reason, it will need to be adequately earthed to minimise microshocks to the public.

For normal, routine maintenance and in an emergency National Grid requires unrestricted access to its assets. So if a tower is enclosed in a solar farm compound, we will need full access for our vehicles,

Diagram not to scale



Including access through any compound gates. During maintenance – and especially re-conductoring – National Grid would need enough space near our towers for winches and cable drums. If enough space is not available, we would require solar panels to be temporarily removed.



Asset protection agreements

In some cases, where there is a risk that development will impact on National Grid's assets, we will insist on an asset protection agreement being put in place. The cost of this will be the responsibility of the developer or third party.

Contact details

Emergency situations

If you spot a potential hazard on or near an overhead electricity line, do not approach it, even at ground level. Keep as far away as possible and follow the six steps below:

- Warn anyone close by to evacuate the area
- Call our 24-hour electricity emergency number: 0800 404 090 (Option 1)¹
- Give your name and contact phone number
- Explain the nature of the issue or hazard
- Give as much information as possible so we can identify the location – i.e. the name of the town or village, numbers of nearby roads, postcode and (ONLY if it can be observed without putting you or others in danger) the tower number of an adjacent pylon
- Await further contact from a National Grid engineer

¹ It is critically important that you don't use this phone number for any other purpose. If you need to contact National Grid for another reason please use our Contact Centre at www2.nationalgrid.com/contact-us to find the appropriate information or call 0800 0014282.

Routine enquiries

Email:
assetprotection@nationalgrid.com

Call Asset Protection on:
0800 0014282

Opening hours:
Monday to Friday 08:00-16:00

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(2) Vertical Axis indicates meters above OS GB Datum 2m distance between minor marks/box

X & Y Co-ordinate of tower base. Route & Tower Number Tower Type

Span Length (m)

Bottom Conductor Displayed at Max Sag

Height of Conductor Attachment Point Above OS GB

5.3m Clearance line at Max Orange dashed line

7.3m Clearance line at Max Sag Blue dashed line

Lidar Data showing Buildings, Roads, Vegetation etc.

North Arrow

OHL Plan View & Downward Looking Imagery

5.3m Clearance line at Max Swing Orange dashed line

Section Operating Voltage, Conductor Type, Conductor Name, Bundle Configuration & Sagging Condition

(1) Vertical & Horizontal Scale – can be used in conjunction with a ruler to take measurements.

IMPORTANT: NOTE HORIZONTAL & VERTICAL SCALES DISTANCE (1) MAY DIFFER FROM HORIZONTAL & VERTICAL GRID MARKS SCALE/BOX DISTANCE (2).

Generic Data Origin of Drawing

Key for LIDAR Data

EN43-8 Clearance to Objects at 400kV

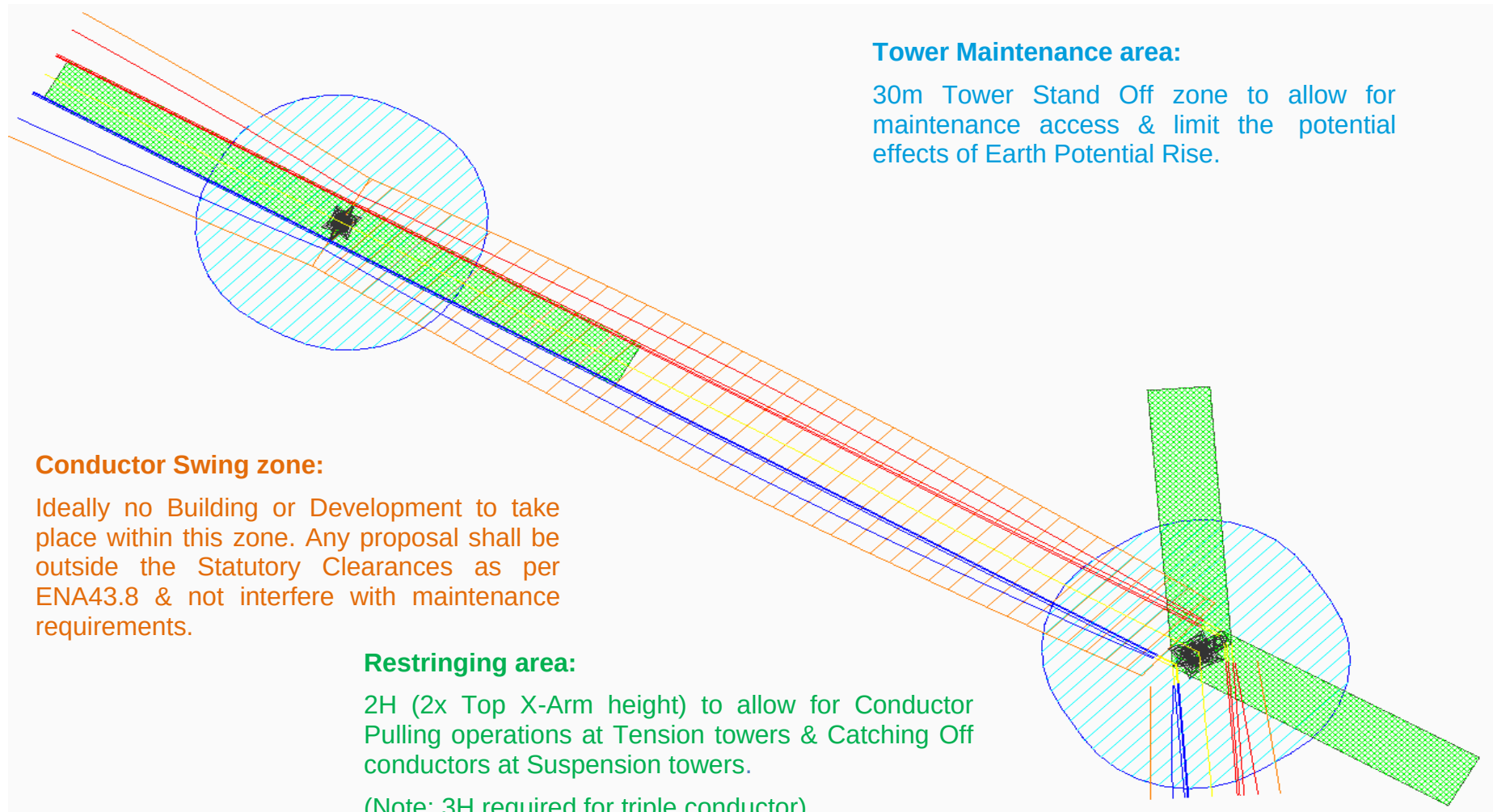
Swing & Sag Diagram

NG Drawing Specific Data

15 APPENDIX B



OHL Tower Stand Off & Reconductoring Area



Date: 19 June 2026
Our ref: 549464
Your ref: EN0710006



Environmental Services,
Infrastructure Decisions and Applications Service
Planning Inspectorate
c/o QUADIENT
69 Buckingham Avenue
Slough
SL1 4PN

Consultations
Hornbeam House
Crewe Business Park
Electra Way
Crewe
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CW1 6GJ

T 0300 060 900

humberhydrogenpipeline@planninginspectorate.gov.uk

BY EMAIL ONLY

Dear Hannah Terry

Environmental Impact Assessment Scoping Consultation under Regulation 10 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) – Regulation 11

Proposal: Humber Hydrogen Pipeline

Thank you for seeking our advice on the scope of the Environmental Statement (ES) in the consultation dated 22 May 2026.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

A robust assessment of environmental impacts and opportunities, based on relevant and up to date environmental information, should be undertaken prior to an application for a Development Consent Order (DCO).

We have reviewed the EIA Scoping Report and have provided comments on the areas relevant to our remit based on this information. Our detailed comments are provided in Annex A to this letter.

For further advice on this consultation please contact consultations@naturalengland.org.uk.

Yours sincerely,


Sustainable Development
Yorkshire and Northern Lincolnshire Area Team

Annex A – Natural England’s Advice on EIA Scoping

1. General principles

Regulation 11 of the Infrastructure Planning Regulations 2017 - (The EIA Regulations) sets out the information that should be included in an ES to assess impacts on the natural environment. This includes:

- A description of the development – including physical characteristics and the full land use requirements of the site during construction and operational phases
- Appropriately scaled and referenced plans which clearly show the information and features associated with the development
- An assessment of alternatives and clear reasoning as to why the preferred option has been chosen
- A description of the aspects and matters requested to be scoped out of further assessment with adequate justification provided¹.
- Expected residues and emissions (water, air and soil pollution, noise, vibration, light, heat, radiation etc.) resulting from the operation of the proposed development
- A description of the aspects of the environment likely to be significantly affected by the development including biodiversity (for example fauna and flora), land, including land take, soil, water, air, climate (for example greenhouse gas emissions, impacts relevant to adaptation), cultural heritage and landscape and the interrelationship between the above factors
- A description of the likely significant effects of the development on the environment – this should cover direct effects but also any indirect, secondary, cumulative, short, medium, and long term, permanent and temporary, positive, and negative effects. Effects should relate to the existence of the development, the use of natural resources (in particular land, soil, water and biodiversity) and the emissions from pollutants. This should also include a description of the forecasting methods to predict the likely effects on the environment
- A description of the measures envisaged to prevent, reduce and where possible offset any significant adverse effects on the environment
- An outline of the structure of the proposed ES

2. Cumulative and in-combination effects

The ES should fully consider the implications of the whole development proposal. This should include an assessment of all supporting infrastructure.

An impact assessment should identify, describe, and evaluate the effects that are likely to result from the project in combination with other projects and activities that are being, have been or will be carried out. The following types of projects should be included in such an assessment (subject to available information):

- a. existing completed projects
- b. approved but uncompleted projects
- c. ongoing activities
- d. plans or projects for which an application has been made and which are under consideration by the consenting authorities; and

¹ National Infrastructure Planning [Advice Note Seven, Environmental Impact Assessment, Process, Preliminary Environmental Information and Environmental Statements](#) (see Insert 2 – information to be provided with a scoping request)

- e. plans and projects which are reasonably foreseeable, i.e. projects for which an application has not yet been submitted, but which are likely to progress before completion of the development and for which sufficient information is available to assess the likelihood of cumulative and in-combination effects.

The Planning Inspectorate uses a four staged approach to Cumulative Effects Assessment (CEA) with the applicant required to fill in templates [4 Stage CEA Process](#).

Natural England notes that there are other relevant NSIPs within the Humber region with potential for overlap. In particular, the proposed Humber Carbon Capture Pipeline follows a broadly similar route and shares a comparable Humber crossing point. Natural England advises that this project should be included within the in-combination assessment. All other relevant projects, with overlapping impact pathways within a suitable zone of influence should be assessed.

3. Environmental data

Natural England is required to make available information it holds where requested to do so. National datasets held by Natural England are available at <http://www.naturalengland.org.uk/publications/data/default.aspx>.

Detailed information on the natural environment is available at www.magic.gov.uk. This includes Marine Conservation Zone GIS shapefiles.

Natural England's SSSI Impact Risk Zones are a GIS dataset which can be used to help identify the potential for the development to impact on a SSSI. The dataset and user guidance can be accessed from the [Natural England Open Data Geoportal](#).

Natural England does not hold local information on local sites, local landscape character, priority habitats and species or protected species. Local environmental data should be obtained from the appropriate local bodies. This may include the local environmental records centre, the local Wildlife Trust, local geo-conservation group or other recording society.

4. Biodiversity and geodiversity

The assessment will need to include potential impacts of the proposal upon sites and features of nature conservation interest as well as opportunities for nature recovery through biodiversity net gain (BNG). There might also be strategic approaches to take into account.

Ecological Impact Assessment (EclA) is the process of identifying, quantifying, and evaluating the potential impacts of defined actions on ecosystems or their components. EclA may be carried out as part of the EIA process or to support other forms of environmental assessment or appraisal. [Guidelines](#) and an [EclA checklist](#) have been developed by the Chartered Institute of Ecology and Environmental Management (CIEEM).

5. International and European sites

Natural England agrees with the study area used to identify Internationally designated sites for this project.

The development site is within or may impact on the following **European/internationally designated nature conservation site(s)**:

- Humber Estuary SPA
- Humber Estuary SAC
- Humber Estuary Ramsar

Natural England concur that Greater Wash SPA can be scoped out of further Assessment in this case.

The ES should thoroughly assess the potential for the proposal to affect internationally designated sites of nature conservation importance / European sites, including marine sites where relevant. This includes Special Protection Areas (SPA), Special Areas of Conservation (SAC), listed Ramsar sites, candidate SAC and proposed SPA.

Article 6 (3) of the Habitats Directive requires an appropriate assessment where a plan or project is likely to have a significant effect upon a European Site, either individually or in combination with other plans or projects.

Natural England's Impact Risk Zones incorporate internationally designated sites and features and can be used to help identify the potential for the development to impact on a European Site. The dataset and user guidance can be accessed from the [Natural England Open Data Geoportal](#).

You can access this information through [NE Maps](#).

Natural England welcomes that Humber Estuary Ramsar, SAC and SPA have been scoped in for further assessment. However, Natural England is unable to agree with the conclusion that effects on the Humber Estuary (Ramsar, SAC and SPA) are likely to be minor - not significant at this stage. Further assessment is required to determine the magnitude of effects.

We note that the Draft Commitments Register includes some best practice measures anticipated for ecological impacts. However, Natural England cannot comment on the suitability of the measures proposed within the Draft Commitments Register until relevant assessments including the HRA have been completed. Bespoke mitigation measures may be required to address impacts to internationally designated sites.

Table 1: Potential risk to International designated sites: the development is within or may impact on the following European/Internationally designated site(s)

Site name with link to conservation objective	Potential impact pathways where further information/assessment is required
Humber Estuary Special Protection Area (SPA) European Site Conservation Objectives for Humber Estuary SPA	The project's order limits cover a significant area in proximity to Humber Estuary SPA and Ramsar sites. The ES/HRA should therefore consider both direct and indirect impacts to SPA species within the designated site boundary, and SPA species utilising areas outside of the site boundary which are functionally linked to the Humber Estuary SPA/Ramsar.
Humber Estuary Ramsar Designated Sites View (naturalengland.org.uk)	Potential Impacts to Functionally Linked Land (FLL) The Proposed Development has potential to result in both temporary and permanent loss of habitats identified as FLL supporting qualifying SPA bird species. This includes permanent loss associated with Above Ground Infrastructure (AGIs), and

Table 1: Potential risk to International designated sites: the development is within or may impact on the following European/Internationally designated site(s)

Site name with link to conservation objective	Potential impact pathways where further information/assessment is required
	temporary loss associated with all construction activities across the Order Limits. Natural England advise that it will be important to present a project-wide assessment for impacts to functionally linked land. This should consider the potential for cumulative habitat losses (including areas supporting below 1% of the estuary population - see Annex B attached) alongside changes in habitat suitability and food availability, and disturbance effects. The assessment of changes to habitat suitability should include potential impacts of introducing additional drainage on areas of FLL, leading to drying and potential reduced usage by SPA birds. Disturbance effects on FLL should be assessed, including those arising from construction, operation, and decommissioning activities (e.g. noise, vibration, artificial lighting, and disruption of open vistas), which may lead to displacement or reduced use of these areas by SPA bird species. Operational effects, particularly from lighting, visual disturbance and noise associated with AGIs, should also be assessed. If overhead lines are required for telecommunications/electricity connection at AGIs, an assessment of potential bird collision risk should be provided. The in-combination assessment should consider whether combined 'temporary' losses of FLL from different projects over overlapping/consecutive construction periods may lead to longer-term losses of FLL. Disturbance to qualifying bird species within the Humber Estuary SPA/Ramsar site The Proposed Development may result in disturbance to SPA bird species within the designated site boundary. Disturbance pathways include construction and operational noise, visual disturbance (e.g. movement of machinery and personnel), and artificial lighting. These effects may influence bird behaviour, including feeding and roosting, and could lead to displacement from sensitive areas. As the final crossing method has not yet been confirmed, the ES/HRA should consider impacts from all potential construction methodologies. This should include Horizontal Directional Drilling (HDD) and tunnelling. <u>Noise and Visual Disturbance</u> Where the development is located in close proximity to a European site boundary the potential for noise and visual disturbance during the construction and operational phase on the designated site

Table 1: Potential risk to International designated sites: the development is within or may impact on the following European/Internationally designated site(s)

Site name with link to conservation objective	Potential impact pathways where further information/assessment is required
	should be assessed. In the first instance, consideration should be given to avoidance of work in these locations during the wintering and passage periods. The noise assessment should present the predicted noise at the sensitive receptor (i.e. the location of SPA birds) and set this in the context of the existing noise environment – i.e. how noise levels will change, including the type of noise such as consistent or sudden loud bangs etc. Factors such as noise ‘peakiness’, including rise time of a noise signal and the frequency content of the noise source, should also be included as these factors may affect behaviour. To understand peak noise levels and the repetition rate of peak noises over a period of time, we suggest L_{Amax} and/or L_{Apeak} levels are assessed, in addition to L_{Aeq}. This will help to understand both average and maximum levels, as each can affect behaviour. A noise contour map should be provided to compare the location of noise contours matching thresholds of concern against the mapped distribution of birds. The assessment should also determine whether there is any visual disturbance associated with the construction or operational works, e.g. presence of machinery or personnel in view of receptor birds. Visual disturbance combined with increased noise levels can increase risk of disturbance. Where significant effects are identified, suitable mitigation measures should be developed. Bird survey methodology We note that we have previously provided DAS advice to the applicant on the scope of bird surveys to be undertaken, and were generally satisfied that the proposed surveys provide a comprehensive overview of the application site. The detailed bird survey results should be presented in full, with clear acknowledgement of any methodological limitations or gaps. We recommend that all survey data are collated into a single, coherent evidence base and presented spatially across the full DCO boundary, supported by mapping, to enable a comprehensive understanding of bird distribution and habitat use. Natural England will provide further advice when the full bird survey results are available.

Table 1: Potential risk to International designated sites: the development is within or may impact on the following European/Internationally designated site(s)

Site name with link to conservation objective	Potential impact pathways where further information/assessment is required
Humber Estuary Special Area of Conservation (SAC) European Site Conservation Objectives for Humber Estuary SAC - UK00300170 (naturalengland.org.uk) Humber Estuary Ramsar Designated Sites View (naturalengland.org.uk)	The ES should consider the potential for direct impacts (e.g., loss/damage to SAC features during the Humber crossing works) and/or indirect impacts (e.g., pollution events) during construction, operation and decommissioning to qualifying features. Humber Crossing The crossing of the Humber will involve working within, or within close proximity of the designated site. Natural England notes that <i>“the two trenchless crossing methods (Option 3: HDD, and Option 4: TBM) were progressed as part of the appraisal and are currently being considered.”</i> As the chosen methodology is not yet known, the specific impacts of this approach cannot yet be ascertained. The ES should therefore consider the impacts of both methodologies on SAC features in full, with further specificity applied when the approach is finalised to fully ascertain the scope of the impacts. Natural England advises that the Applicant undertakes Ground Investigation (GI) works to demonstrate the feasibility of the HDD and/or tunnelling approach, including geotechnical surveys and a feasibility report. Note that GI works may require a separate marine licence/planning permission. Natural England advises that impacts must be assessed over the whole scale of the project, including the use of any construction vessels, jack-up rigs and access routes within the intertidal zone. Assessments must consider the worst-case scenario (WCS), including potential impacts from contingency methods. Note we generally advise against the use of jack-up rigs within designated sites. The required stand-off distance for entry and exit points should be considered. Natural England advises that a number of plans will be required at the Application phase, including marine pollution contingency plans, outline Construction Environmental Management Plan (CEMP), Drilling Fluid Management Plan (DFMP) and a method statement for the works. Whilst recognising trenchless techniques are proposed, the ES should still assess potential impacts associated with sediment mobilisation arising from trenchless crossing techniques, including both routine construction processes and unplanned events. This should include an assessment of the risk of drilling fluid release (e.g. through frac-out, bore collapse, or sinkhole formation), sediment suspension and deposition, and associated changes in turbidity. Natural England notes that the HDD route has the potential to

Table 1: Potential risk to International designated sites: the development is within or may impact on the following European/Internationally designated site(s)

Site name with link to conservation objective	Potential impact pathways where further information/assessment is required
	impact intertidal mudflat and coastal saltmarsh. HDD has the potential to result in ‘frac-out’ of drilling fluid in the event of unconsolidated sediment, with a higher risk of frac-out within areas of saltmarsh due to unconsolidated sediment and air pockets. Therefore, the risk of frac-out upon intertidal and coastal habitats must be assessed in the ES, and contingency measures provided in the event of an incident occurring. The potential for contamination of sediments and subsequent transport into the SAC via hydrological pathways should be considered, as well as impacts on SPA foraging habitats. The spatial extent, duration, and ecological consequences of such releases should be characterised, including potential effects on benthic habitats, fish, and supporting features of the SAC. The design of the project should seek to avoid impacts upon designated features and sensitive receptors (including NERC S41 habitats). Mitigation measures will need to be secured to minimise the risk to designated features, including real-time drilling fluid monitoring, use of spotters and exclusion zones around sensitive features. Natural England advises that pre-construction intertidal ecological surveys should be conducted for the Humber crossing to provide an environmental baseline in the event of frac-out or other incident occurring. This can then inform subsequent monitoring of recovery of features and inform on the requirement for remedial measures. <u>Noise and visual disturbance</u> The ES should consider direct (e.g., ground boring noise and vibration) and indirect impacts (e.g., pollution events) to river lamprey, sea lamprey, and grey seal. We note that grey seal is scoped out of the EcIA but will be considered within the HRA screening, the reasoning for this difference should be clarified. We advise that the applicant should provide information on expected noise and vibration levels associated with trenchless crossing techniques, including whether any works and/or surveys will be required within or adjacent to the estuary, and the spatial extent of any underwater noise. These should be used to inform an assessment of potential disturbance effects on grey seal as part of the likely significant effect (LSE) test. If it is demonstrated that noise will not meaningfully propagate through to the estuary, a conclusion of no LSE may be reached. Natural England advises that the River Hull is a river and sea lamprey migration route. We therefore advise that potential

Table 1: Potential risk to International designated sites: the development is within or may impact on the following European/Internationally designated site(s)

Site name with link to conservation objective	Potential impact pathways where further information/assessment is required
	construction and operation impacts to lamprey migration routes should be assessed, including potential impacts resulting from noise and vibration and habitat loss/degradation. <u>Potential water quality impacts</u> The order limits include a large number of drains/watercourses which the pipeline will need to cross, including the Humber Estuary SAC. The ES should assess instances wherein the proposed development site is hydrologically connected to the Humber Estuary SAC, and consider possible impacts including, but not limited to; hydrological changes, pollution events, and sedimentation. As detailed above, the ES should also assess potential impacts associated with HDD activities, including, but not limited to, drilling fluid break-out, pollutant runoff to surface waters, and effects arising from water abstraction. The proposed approach to discharging wastewater from relevant activities including temporary dewatering and hydrostatic testing should also be assessed in the context of impacts to the Humber Estuary designated sites. <u>Potential hydrology / hydrogeology impacts</u> Potential hydrological and hydrogeological impacts from relevant activities should be assessed. Natural England recommends that the assessment of the Baseline Environment should provide a comprehensive understanding of the physical characteristics of the coastal environment of the Humber Estuary at relevant locations. The Humber Estuary is tidal in the area of the crossing route. Therefore, major forcing such as metocean (e.g. tidal currents, wave climate, storm surges,), hydrogeological and ground water, coastal erosion and flooding from tidal, waves, rain water/runoff, and the influences of the other industrial uses of the estuary on physical processes should be considered. There are complex interactions between superficial separated ground water bodies, ground water, and inputs of freshwater, brackish water and sea water under the land separating the Humber Estuary from the open sea. Therefore, Natural England advises that the study area (500m from pipeline) on the surface does not necessarily reflect the effects/impacts of the structures on water bodies below ground. The boundary and extent of the study area in relation to the position of the HDD exit points and all

Table 1: Potential risk to International designated sites: the development is within or may impact on the following European/Internationally designated site(s)	
Site name with link to conservation objective	Potential impact pathways where further information/assessment is required
	temporary/permanent structures linked to the project should be considered once the baseline is properly informed. All structures related to construction will need to be considered along the route below the seabed and on the banks. Their interaction with intertidal processes such as salt / freshwater saltmarshes will need to be addressed. The ES should also consider potential impacts of dewatering and other relevant activities on flow rates to the estuary. <u>Potential air quality impacts</u> See section 14 below for further information on air quality impacts to designated sites with 200m of the proposed development site.

6. Nationally designated sites

Sites of Special Scientific Interest

Sites of Special Scientific Interest (SSSIs) are protected under the Wildlife and Countryside Act 1981 (as amended). Further information on the SSSI and its special interest features can be found at www.magic.gov.uk.

Natural England's SSSI Impact Risk Zones can be used to help identify the potential for the development to impact on a SSSI. The dataset and user guidance can be accessed from the [Natural England Open Data Geoportal](#).

The development site is within or may impact on the following Site of Special Scientific Interest:

- Humber Estuary SSSI
- Roos Bog SSSI
- The Lagoons SSSI
- North Killingholme Haven Pits SSSI

We note that there is inconsistency between the SSSIs identified within the 10 km search area and those referred to elsewhere in the report, and it is therefore unclear which sites have been screened and will be taken forward in the assessment. A consolidated list of all SSSIs considered within the study area should be provided to ensure clarity in the scope of the assessment.

The ES should include a full assessment of the direct and indirect effects of the development

on the features of special interest within the listed SSSIs and identify appropriate mitigation measures to avoid, minimise or reduce any adverse significant effects.

Table 2: Potential risks to nationally designated sites: the development is within or may impact on the following sites	
Site name with link to citation	Potential impact pathways where further information/assessment is required
North Killingholme Haven Pits SSSI	North Killingholme Haven Pits SSSI is located approximately 2.4 km from the proposed pipeline and lies within its Impact Risk Zone; therefore, the ES should assess potential indirect impacts. Our advice regarding North Killingholme Haven Pits SSSI broadly coincides with those set out above for the corresponding European sites, Humber Estuary SPA and Ramsar. However, we highlight that North Killingholme Haven Pits SSSI is designated for additional features. Therefore, potential impacts on these features should also be considered in the relevant assessment and appropriate justification provided where impacts are ruled out.
The Lagoons SSSI	The Lagoons SSSI lies approximately 1.9km from the scoping boundary. The ES should examine the possibility of indirect impacts. Our advice regarding The Lagoons SSSI broadly coincides with those set out above for the corresponding European sites, Greater Wash SPA, Humber Estuary SAC and Ramsar. However, we highlight that The Lagoons SSSI is designated for additional features. Therefore, potential impacts on these features should also be considered in the relevant assessment and appropriate justification provided where impacts are ruled out.
Humber Estuary SSSI	Our advice regarding Humber Estuary SSSI broadly coincides with those set out in section 5 for the corresponding European sites, Humber Estuary SPA/SAC/Ramsar. However, we highlight that Humber Estuary SSSI is designated for additional features. Therefore, potential impacts on these features should also be considered in the relevant assessment and appropriate justification provided where impacts are ruled out.
Roos Bog SSSI	Roos Bog SSSI lies approximately 1.6 km from the scoping boundary and falls within its Impact Risk Zone; therefore, the ES should assess potential indirect impacts. Please note that this is a geological SSSI.
Dimlington Cliff SSSI	We note that this feature is identified within the study area; however, as it lies outside the Geological IRZ, Natural England does not anticipate any geological impacts in this case.

7. Protected species

The conservation of species protected under the Wildlife and Countryside Act 1981 and the

Conservation of Habitats and Species Regulations 2017 is explained in Part IV and Annex A of Government Circular 06/2005 [Biodiversity and Geological Conservation: Statutory Obligations and their Impact within the Planning System](#). Natural England acknowledge the changes to protected species survey methodology highlighted in DAS conversations with Arcadis.

Regarding reptiles, the applicant should refer to Natural England's [standing advice](#).

Applicants should check to see if a mitigation licence is required using Natural England guidance on licensing [Natural England wildlife licences](#). Applicants can also make use of Natural England's charged service [Pre Submission Screening Service](#) for a review of a draft wildlife licence application. Natural England then reviews a full draft licence application to issue a Letter of No Impediment (LONI) which explains that based on the information reviewed to date, that it sees no impediment to a licence being granted in the future should the DCO be issued. This is done to give the Planning Inspectorate confidence to make a recommendation to the relevant Secretary of State in granting a DCO. See [Advice Note Eleven, Annex C – Natural England and the Planning Inspectorate | National Infrastructure Planning](#) for details of the LONI process.

The ES should assess the impact of all phases of the proposal on protected species (including, for example, great crested newts, reptiles, birds, water voles, badgers and bats). Natural England does not hold comprehensive information regarding the locations of species protected by law. Records of protected species should be obtained from appropriate local biological record centres, nature conservation organisations and local groups. Consideration should be given to the wider context of the site, for example in terms of habitat linkages and protected species populations in the wider area.

The area likely to be affected by the development should be thoroughly surveyed by competent ecologists at appropriate times of year for relevant species and the survey results, impact assessments and appropriate accompanying mitigation strategies included as part of the ES. Surveys should always be carried out in optimal survey time periods and to current guidance by suitably qualified and, where necessary, licensed, consultants.

Natural England has adopted [standing advice](#) for protected species, which includes guidance on survey and mitigation measures. A separate protected species licence from Natural England or Defra may also be required.

Natural England notes, and welcomes, that the applicant has committed to undertaking ecological surveys in accordance with current good practice guidance, including CIEEM (2021). Overall, the proposed survey effort demonstrates an understanding of proportionality, with survey scope and intensity tailored to the scale, linear nature and anticipated impacts of the scheme. Where deviations from established guidance are proposed, these are generally acknowledged, justified, and framed within a precautionary approach. Provided that any residual uncertainty is addressed through appropriate mitigation and, where necessary, updated survey at the formal licensing stage, the overall approach would be broadly consistent with Natural England's expectations for informing impact assessment and supporting protected species licensing applications. Natural England's detailed comments on the proposed protected species surveys can be found in Table 3.

Natural England welcomes that protected species have been scoped in for further assessment. However, Natural England is unable to agree with the conclusion that effects on protected species are likely to be minor - not significant at this stage. Further assessment is required to determine the magnitude of effects.

Table 3: Natural England comments on proposed protected species surveys	
Species	Natural England Comment
Great Crested Newts	NE notes the proposal to proceed under a District Level Licensing (DLL) scheme, with no site-specific survey route. This approach is well established and, where the development meets the eligibility criteria of the relevant DLL scheme, is considered appropriate. Use of DLL removes the requirement for traditional presence/absence and population size class assessments, provided that the impact assessment, design parameters and compensation calculations are completed in accordance with scheme requirements. Subject to confirmation of scheme eligibility and correct application of the DLL process, this approach would be acceptable for licensing purposes.
Bats – Roost Assessment (Trees and Woodland)	NE notes the use of preliminary Ground Level Tree Assessments (GLTAs) to inform early design, including the precautionary classification of trees as Potential Roost Features of higher value where uncertainty exists. While current Bat Conservation Trust guidance advises that PRF-I and PRF-M classifications should be based on confirmed features, NE recognises the value of early precautionary assessment in guiding avoidance and design refinement, particularly for large linear infrastructure projects. For licensing purposes, it is important that preliminary classifications are not relied upon as definitive evidence of roost presence or absence. NE would expect that any trees or woodlands subject to potential impacts and identified as having moderate or high bat roost potential would be subject to appropriate further survey (e.g. climbing or emergence surveys) prior to submission of a bat licence application, unless impacts can be demonstrably avoided. Subject to this clarification, the proposed staged survey approach would be considered appropriate and consistent with the principles of proportionality and precaution.
Bats – Activity and Foraging Surveys	NE notes the proposal to undertake automated bat activity surveys between May and October, rather than April to October as set out in current guidance. This deviation may be acceptable where clearly justified and where survey results are interpreted in the context of any seasonal limitations, and/or relative information regarding geographic variance, as referred to. The proposed reliance on static detector surveys, without undertaking bat night-time walkover (transect) surveys, is more difficult to comment on with certainty. NE accepts that access constraints, health and safety considerations, landownership complexity, and the temporary nature of much of the impact are material considerations for linear schemes. However, static surveys alone may be less effective at characterising the spatial use of habitats, commuting corridors and crossing points. For licensing purposes, NE would expect the applicant to demonstrate that detector deployment has been strategically designed to capture functional connectivity and that limitations of the method are clearly recognised. Where impacts to high-value linear features are anticipated, additional survey effort or enhanced mitigation may be required to address residual

	uncertainty.
Otter and Water Vole	NE notes that standard survey methods are proposed for otter and water vole, in line with established guidance. No deviations from good practice are identified. Provided surveys are undertaken at an appropriate time of year and inform suitable avoidance, mitigation and licensing measures where required, this approach would be considered suitable to support any future licensing applications relating to these species.
Badger	NE notes the proposed approach of recording signs of badger activity and undertaking further assessment of any setts identified within or adjacent to the site. This approach is consistent with good practice. Where impacts to setts cannot be avoided, the applicant has indicated that a licence will be sought. This is appropriate, and NE would expect any licence application to be supported by clear evidence of necessity, alternatives considered, and appropriate mitigation and compensation.
Reptiles	NE notes the proposal not to undertake detailed population assessments in areas where only small, isolated patches of suitable habitat are present, and instead to adopt a precautionary working method statement. Provided that the method statement includes appropriate timing constraints, toolbox talks, supervision where necessary, and stop-work procedures, this approach would be considered proportionate and appropriate. As reptiles are typically not subject to licensing in England, this method would likely be sufficient for compliance with the required legislation.

8. District Level Licensing for great crested newts

Natural England welcomes the use of the District Level Licensing (DLL) scheme for great crested newts (GCN) for this project.

As the applicant is proposing to use DLL, they should engage with Natural England's GCN DLL team as early as possible in their scheme design to understand the associated costs and discuss if there is sufficient capacity to meet the needs of the project:
gcndll@naturalengland.org.uk.

Where strategic approaches such as DLL for GCN are used, a Letter of No Impediment (LONI) will not be required. Instead, the developer will need to provide evidence to the Examining Authority (ExA) on how and where this approach has been used in relation to the proposal, which must include a counter-signed Impact Assessment and Conservation Payment Certificate (IACPC) from Natural England, or a similar approval from an alternative DLL provider.

The DLL approach is underpinned by a strategic area assessment which includes the identification of risk zones, strategic opportunity area maps and a mechanism to ensure adequate compensation is provided regardless of the level of impact. In addition, Natural England (or an alternative DLL provider) will undertake an impact assessment, the outcome

of which will be documented in the IACPC (or equivalent).

If no GCN surveys have been undertaken, Natural England's risk zone modelling may be relied upon. During the impact assessment, Natural England will inform the applicant whether their scheme is within one of the amber risk zones and therefore whether the Proposed Development is likely to have a significant effect on GCN.

The IACPC will also provide additional detail including information on the Proposed Development's impact on GCN and the appropriate compensation required.

By demonstrating that the [DLL scheme for GCN](#) will be used, consideration of GCN in the ES can be restricted to cross-referring to the Natural England (or alternative provider) IACPC as a justification as to why significant effects on GCN populations as a result of the Proposed Development would be avoided.

9. Priority Habitats and Species

Priority Habitats and Species are of particular importance for nature conservation and included in the England Biodiversity List published under section 41 of the Natural Environment and Rural Communities Act 2006. Most priority habitats will be mapped either as Sites of Special Scientific Interest, on the Magic website or as Local Wildlife Sites. Lists of priority habitats and species can be found [here](#). Natural England does not routinely hold species data. Such data should be collected when impacts on priority habitats or species are considered likely.

Consideration should also be given to the potential environmental value of brownfield sites, often found in urban areas and former industrial land. Sites can be checked against the (draft) national Open Mosaic Habitat (OMH) inventory published by Natural England and freely available to [download](#). Further information is also available [here](#).

An appropriate level habitat survey should be carried out on the site, to identify any important habitats present. In addition, ornithological, botanical, and invertebrate surveys should be carried out at appropriate times in the year, to establish whether any scarce or priority species are present.

The ES should include details of:

- Any historical data for the site affected by the proposal (e.g. from previous surveys)
- Additional surveys carried out as part of this proposal
- The habitats and species present
- The status of these habitats and species (e.g. whether priority species or habitat)
- The direct and indirect effects of the development upon those habitats and species
- Full details of any mitigation or compensation measures
- Opportunities for biodiversity net gain or other environmental enhancement

10. Ancient Woodland, ancient and veteran trees

The ES should assess the impacts of the proposal on any ancient and veteran trees, and the scope to avoid and mitigate for adverse impacts. It should also consider opportunities for enhancement.

Ancient woodland and ancient and veteran trees are irreplaceable habitats of great importance for its wildlife, its history, and the contribution it makes to our diverse landscapes. Paragraph 180 of the NPPF sets out the highest level of protection for irreplaceable habitats and

development should be refused unless there are wholly exceptional reasons, and a suitable compensation strategy exists.

Natural England maintains the [Ancient Woodland Inventory](#) which can help identify ancient woodland. The [wood pasture and parkland inventory](#) sets out information on wood pasture and parkland.

The [ancient tree inventory](#) provides information on the location of ancient and veteran trees.

Natural England and the Forestry Commission have prepared [standing advice](#) on ancient woodland, ancient and veteran trees.

11. Biodiversity net gain

We welcome the commitment to delivering Biodiversity Net Gain (BNG) on this project. BNG will become mandatory for NSIPs in November 2026. The Environment Act 2021 includes NSIPs in the requirement for BNG, with the biodiversity gain objective for NSIPs defined as at least a 10% increase in the pre-development biodiversity value of the on-site habitat. The new Biodiversity Gain Statement sets out how energy NSIPs must calculate, deliver and report on BNG². Further upcoming guidance on delivering BNG for NSIPs should also be adhered to.

Early engagement with Natural England on BNG proposals will help maximise outcomes and reduce risks. It would also be beneficial to align BNG provision with the features of the designated site and the aims of the LNRS, and we advise consultation with the relevant LPAs on this matter should be considered.

12. Connecting people with nature

The ES should consider potential impacts on access land, common land, public rights of way and, where appropriate, the England Coast Path and coastal access routes and coastal margin in the vicinity of the development, in line with National Policy Statement EN-1. NPS EN-1 paragraph 5.11.30 states:

‘Public Rights of way, National Trails, and other rights of access to land are important recreational facilities for example for walkers, cyclists and horse riders. The Secretary of State should expect applicants to take appropriate mitigation measures to address adverse effects on coastal access, National Trails, other rights of way and open access land and, where appropriate, to consider what opportunities there may be to improve or create new access. In considering revisions to an existing right of way, consideration should be given to the use, character, attractiveness, and convenience of the right of way’.

The ES should assess the scope to mitigate for any adverse impacts. Rights of Way Improvement Plans (ROWIP) can be used to identify public rights of way within or adjacent to the proposed site that should be maintained or enhanced.

Measures to help people to better access the countryside for quiet enjoyment and opportunities to connect with nature should be considered. Such measures could include reinstating existing footpaths or the creation of new footpaths, cycleways, and bridleways. Links to other green networks and, where appropriate, urban fringe areas should also be

² [NSIPs: biodiversity gain statement for energy - GOV.UK](#)

explored to help promote the creation of wider green infrastructure. Access to nature within the development site should also be considered, including the role that natural links have in connecting habitats and providing potential pathways for movements of species. The linear nature of the project may offer opportunities to connect the landscape for people and nature.

13. Soils and agricultural land quality

Soils are a valuable, finite natural resource and should also be considered for the ecosystem services they provide, including for food production, water storage and flood mitigation, as a carbon store, reservoir of biodiversity and buffer against pollution. It is therefore important that the soil resources are protected and sustainably managed. Impacts from the development on soils and best and most versatile (BMV) agricultural land should be considered. Further guidance is set out in the Natural England [Guide to assessing development proposals on agricultural land](#).

The following issues should be considered and, where appropriate, included as part of the ES:

- The degree to which soils would be disturbed or damaged as part of the development.
- The extent to which agricultural land would be disturbed or lost as part of this development, including whether any BMV agricultural land would be impacted.

The ES should set out details of how any adverse impacts on BMV agricultural land can be minimised through site design/masterplan. All types of development should avoid BMV land as far as reasonably practicable.

- Where BMV land cannot be avoided, clear consideration of alternatives should be presented with rationale provided for the use of BMV land for the development. In addition, micro-siting of the most damaging infrastructure away from BMV should be undertaken following the ALC survey.
- The ES should set out details of how any adverse impacts on soils can be avoided or minimised and demonstrate how soils will be sustainably used and managed, including consideration in site design and master planning, and areas for green infrastructure or biodiversity net gain. The aim will be to minimise soil handling and maximise the sustainable use and management of the available soil to achieve successful after-uses and minimise off-site impacts.

Natural England welcomes that a detailed ALC survey will be undertaken. The ALC survey must:

- be carried out in accordance with the Agricultural Land Classification in England and Wales. Revised guidelines and criteria for grading the quality of agricultural land
- be carried out at a detailed level, e.g. one auger boring per hectare, supported by pits dug in each main soil type to confirm the physical characteristics of the full depth of the soil resource, i.e. 1.2 metres, unless otherwise agreed with NE. The survey data can inform suitable soil handling methods and appropriate reuse of the soil resource where required (e.g. agricultural reinstatement, habitat creation, landscaping, allotments and public open space).
- be carried out by a soil specialist with suitable credentials, such as member of Institute Professional Soil Scientists (M I Soil Sci).

Further information is available in the [Defra Construction Code of Practice for the Sustainable Use of Soil on Development Sites](#) and The British Society of Soil Science Guidance Note [Benefitting from Soil Management in Development and Construction](#).

14. Air quality

Air quality in the UK has improved over recent decades but air pollution remains a significant issue. For example, approximately 85% of protected nature conservation sites are currently in exceedance of nitrogen levels where harm is expected (critical load) and approximately 87% of sites exceed the level of ammonia where harm is expected for lower plants (critical level of 1µg)^[1]. A priority action in the England Biodiversity Strategy is to reduce air pollution impacts on biodiversity. The Government's Clean Air Strategy also has a number of targets to reduce emissions including to reduce damaging deposition of reactive forms of nitrogen by 17% over England's protected priority sensitive habitats by 2030, to reduce emissions of ammonia against the 2005 baseline by 16% by 2030 and to reduce emissions of NO_x and SO₂ against a 2005 baseline of 73% and 88% respectively by 2030. Shared Nitrogen Action Plans (SNAPs) have also been identified as a tool to reduce environmental damage from air pollution.

The planning system plays a key role in determining the location of developments which may give rise to pollution, either directly, or from traffic generation, and hence planning decisions can have a significant impact on the quality of air, water and land. The ES should take account of the risks of air pollution and how these can be managed or reduced. This should include taking account of any strategic solutions or SNAPs, which may be being developed or implemented to mitigate the impacts of air quality. Further information on air pollution impacts and the sensitivity of different habitats/designated sites can be found on the Air Pollution Information System (www.apis.ac.uk).

Natural England have produced air quality standard guidance for Nationally Significant Infrastructure Projects (Annex C attached). It outlines the main air pollutants and gives standardised advice on how to assess significance of impacts to designated sites. As this Project includes novel technology, we may also review the assessments and provide bespoke advice. We would be happy to work with the Applicant on this through pre-application engagement.

Information on air pollution modelling, screening and assessment can be found on the following websites:

- SCAIL Combustion and SCAIL Agriculture - <http://www.scail.ceh.ac.uk/>
- Ammonia assessment for agricultural development
<https://www.gov.uk/guidance/intensive-farming-risk-assessment-for-your-environmental-permit>
- Environment Agency Screening Tool for industrial emissions
<https://www.gov.uk/guidance/air-emissions-risk-assessment-for-your-environmental-permit>
- Defra Local Air Quality Management Area Tool (Industrial Emission Screening Tool) – England <http://www.airqualityengland.co.uk/laqm>

15. Water quality

NSIPs can occur in areas where strategic solutions are being determined for water pollution issues and they may not have been factored into the local planning system as they are delivered through National Policy Statements.

^[1] [Report: Trends Report 2020: Trends in critical load and critical level exceedances in the UK - Defra, UK](#)

The planning system plays a key role in determining the location of developments which may give rise to water pollution, and hence planning decisions can have a significant impact on water quality, and land. The assessment should take account of the risks of water pollution and how these can be managed or reduced. A number of water dependent protected nature conservation sites have been identified as failing condition due to elevated nutrient levels and nutrient neutrality is consequently required to enable development to proceed without causing further damage to these sites. The ES needs to take account of any strategic solutions for nutrient neutrality or Diffuse Water Pollution Plans, which may be being developed or implemented to mitigate and address the impacts of elevated nutrient levels.

16. Climate change

The England Biodiversity Strategy published by Defra establishes principles for the consideration of biodiversity and the effects of climate change. The ES should reflect these principles and identify how the development's effects on the natural environment will be influenced by climate change, and how ecological networks will be maintained. The NPPF requires that the planning system should contribute to the enhancement of the natural environment 'by establishing coherent ecological networks that are more resilient to current and future pressures' (NPPF Para 174), which should be demonstrated through the ES.

17. LNRS

To ensure that all opportunities for nature recovery are taken account of in design and assessment of an NSIP, it is recommended that the relevant Local Nature Recovery Strategy (LNRS) is considered at the earliest opportunity.

Details of the Hull and East Riding LNRS can be found here: [Hull and East Yorkshire Local Nature Recovery Strategy - Hull and East Yorkshire Local Nature Partnership](#).

Details of the Greater Lincolnshire LNRS can be found here: [Greater Lincolnshire Local Nature Recovery Strategy - Greater Lincolnshire Local Nature Recovery Strategy](#)

The LNRS and its associated Local Habitat Map can provide clear guidance on locally agreed Priorities and associated Measures (sometimes called Actions) for nature recovery. Natural England recommends that NSIP schemes review the LNRS mapping for the site area taking account of relevant mapped measures for the site. These mapped measures were informed by local expertise and provide a clear steer on the most appropriate activity for that location in terms of nature recovery, nature based solutions and wider access to nature opportunities. This can save time and effort in identifying nature recovery and nature based solutions which are appropriate for a site.

Unmapped habitat and species measures in an LNRS are applicable wherever they are relevant to the location being considered. All types of measures offer insight into locally agreed activities on nature recovery for that area supported by Local Nature Partnerships and other stakeholders. This can help to ensure design that is acceptable to local stakeholders and address environmental considerations.

18. Green Infrastructure

Green Infrastructure (GI) is defined in the National Planning Policy Framework (NPPF) as *"a network of multi-functional green and blue spaces and other natural features, urban and rural, which is capable of delivering a wide range of environmental, economic, health and wellbeing benefits for nature, climate, local and wider communities and prosperity."*

NSIPs play a role in delivering GI to enable more sustainable development, climate resilience, and nature recovery. Natural England highlights that the Overarching NPS for Energy (EN1) states:

“4.6.13 In addition to delivering biodiversity net gain, developments may also deliver wider environmental gains and benefits to communities relevant to the local area, and to national policy priorities, such as:

- *reductions in GHG emissions*
- *reduced flood risk*
- *improvements to air or water quality,*
- *climate adaptation,*
- *landscape enhancement*
- *increased access to natural greenspace, or*
- *the enhancement, expansion or provision of trees and woodlands.*

*The scope of potential gains will be dependent on the type, scale, and location of specific projects. **Applicants should look for a holistic approach to delivering wider environmental gains and benefits through the use of nature-based solutions and Green Infrastructure.**”*

Natural England therefore encourages the incorporation of GI into NSIPs.

GI refers to natural and semi-natural features and networks, such as parks, woodlands, and wetlands, that provide a range of benefits including flood protection, air quality improvement, and biodiversity enhancement.

GI should:

- create and maintain green liveable places that enable people to experience and connect with nature
- enhance ecological networks, support ecosystems services and connect as a living network at local, regional and national scales.

Natural England has developed the [Green Infrastructure Framework](#) – a national standard to guide the planning, design, and maintenance of green infrastructure in England. This framework provides guidance for integrating natural elements into major developments.

For evidence-based advice and tools on how to design, deliver and manage green and blue infrastructure (GI), we refer you to [Green Infrastructure Home](#). This includes:

- The [Principles](#) that underpin the Green Infrastructure Framework, which set out what good green infrastructure is, why it's important and how to do it well.
- The [Standards](#), which define what good green infrastructure 'looks like' for local planners, developers, parks and greenspace managers and communities, and how to plan it strategically to deliver multiple benefits for people and nature.
- The [Green Infrastructure Planning and Design Guide](#), which provides guidance for developers on how well-designed GI can integrate with built design to create good quality, distinctive and sustainable places.
- [Mapping Database](#) with analysis of existing provision, including mapped representation of the areas thought to meet the size and proximity criteria.
- The [Environmental Benefits from Nature Tool](#) highlights wider benefits and comparison of options.

We recommend a bespoke approach to identifying the most suitable types, locations and scale of GI needed to support growth, alongside health and wellbeing, biodiversity and

climate resilience in the context of each proposal. Consideration should be given to the relevant Local Nature Recovery Strategy/ies (LNRS).

Natural England recommends that NSIPs should include a GI plan, including a long-term delivery and management plan. Relevant aspects of local authority GI strategies and Local Nature Recovery Strategies (LNRS) should be integrated and delivered where appropriate.

Annex B

Applying the 1% 'rule of thumb' on the Humber Estuary – summary of Natural England's current approach (November 2025)

Loss of functionally linked land

Natural England recognises that 1% of the Humber Estuary population (based on the most recent WeBS 5-year average count) has historically been used as a 'threshold' to determine likely significant effects from loss of functionally linked land (FLL).

However, this approach was intended to provide a 'rule of thumb' for assessments and does not take into account other factors such as regularity of usage, species diversity, SPA conservation objectives, Estuary-level population declines, and existing pressures on relevant species. Due to these limitations, Natural England does not consider that using 1% 'rule of thumb' alone is suitably precautionary to define important areas of FLL around the Humber Estuary SPA.

Assessment of likely significant effect

We advise that the assessment of likely significant effect should be based on site characteristics of the proposed development site and suitability for SPA birds, including proximity to the Humber Estuary SPA, habitat suitability, and size of the site, in addition to local ecological knowledge and previous bird records.

If it is concluded that the proposal could have a likely significant effect, Natural England advises that non-breeding bird surveys should be carried out in line with Annex C (available on request from Natural England).

If the proposal is identified as not likely to have a significant effect on SPA birds 'alone' due to loss of FLL, then other projects in the area should be considered 'in combination'.

Appropriate assessment

Bird survey data should be assessed at the appropriate assessment stage. Natural England advises that any area of supporting habitat used by SPA birds is, by definition, FLL. The appropriate assessment should evaluate the importance of the site for SPA species and determine whether mitigation is required.

We advise that the following factors should be considered in the assessment:

- Number of birds recorded on the development site (peak count) compared to the 5-

year mean of the WeBs data for the Humber Estuary. Sites which support over 1% of the estuary population are likely to provide important FLL and require mitigation.

- Diversity of species recorded using the site: sites which support more than one SPA species in numbers below 1% (for each species) may provide important FLL.
- Frequency of usage: sites which regularly support SPA species in numbers below 1% may provide important FLL.
- Population trends and declines for relevant species. Declining species may be more vulnerable to loss of FLL, due to existing pressures. It may be helpful to refer to:
 - Trends in the Humber population of species (based on WeBS counts and trends since designation etc). The most recent BTO WeBS analysis report for the Humber is: [Analysis of Wetland Bird Survey \(WeBS\) data for The Humber Estuary SSSI, SAC, SPA and Ramsar site: fourth appraisal — sector-level trends to winter 2021/22 | BTO](#).
 - Wider UK declines in relevant species. See [WeBS Official Statistics | JNCC - Adviser to Government on Nature Conservation](#) and [Wetland Bird Survey Annual Report | BTO](#).
 - [BTO WeBS alerts](#), which details High (red) and Medium (Amber) Alerts for relevant species. The report also indicates where comparison of site trends with regional trends suggests that the declines underpinning Alerts status may be driven or exacerbated by site-specific pressures. Note that the Alerts only include individually qualifying features, so it is not possible to apply this for all species.
 - Current condition of SSSI bird features (which underpin the SPA): [Site feature condition \(naturalengland.org.uk\)](#).
- Supplementary Advice for Humber Estuary SPA: [Designated Sites View \(naturalengland.org.uk\)](#) to identify whether existing pressures have been identified for relevant species and if targets for supporting habitat are set to 'restore' or 'maintain'. For example, the target for golden plover supporting habitat is to 'Restore the extent, distribution and availability of suitable habitat (either within or outside the site boundary) which supports the feature for all necessary stages of the non-breeding/wintering period.' Therefore, loss of FLL may make reaching this target more difficult.
- Availability of other areas of FLL in proximity to the development. A site may be more likely to provide important FLL where availability of alternative supporting habitat is more limited, even if recorded numbers are lower than 1% of the estuary population. However, good availability of alternative FLL does not automatically mean there is no adverse effect, especially if the site supports high numbers of SPA birds or other key factors apply. In such cases, the decision should be based on the combination of factors outlined in this list, rather than relying solely on habitat availability.
- In-combination effects – if there is more than one development proposed in the area which will lead to loss of FLL an 'in combination' assessment should be carried out. Mitigation may be required for developments in-combination where SPA birds are using multiple sites that are proposed for development.

In terms of assessing the potential impact on species from the proposed development, Natural England has not defined an alternative 'threshold' for the peak count and/or regularity of species recorded. We advise that professional judgement should be used,

informed by the survey data and other available information (such as the sources referred to above) to assess the ecological importance of the site.

Loss of SPA habitat within the designated site boundary

In relation to loss of SPA supporting habitat within the designated site boundary, Natural England advises that it is not appropriate to apply a 'threshold' of bird numbers to rule out likely significant effects. SPA birds are highly mobile and will use different parts of the estuary at different times of year.

Natural England advises that if a plan/project involves permanent habitat loss, then there is a credible risk that the plan or project might undermine the conservation objectives of a European site, i.e. likely significant effects cannot be ruled out, and the habitat loss should be assessed further in an appropriate assessment.

Natural England will normally advise that a lasting and irreparable loss of European Site habitat will prevent a conclusion of no adverse effect on site integrity being reached unless an appropriate assessment can clearly ascertain otherwise.

Please contact Natural England via the Discretionary Advice Service (DAS) if a proposal may involve loss of SPA habitat.

Noise/visual disturbance

New development can result in impacts to SPA birds from noise and/or visual disturbance. Both the construction and operational periods should be considered in the assessment.

The screening assessment for potential construction and operational noise and visual disturbance effects on birds from new proposals should first consider whether the resulting disturbance could impact birds. This should be based on:

1. Type of activity and whether there is an associated increase in noise or visual disturbance levels, including the introduction of additional lighting.
2. Timing of the activity likely to cause disturbance (time of day/night, season, state of tide where relevant).
3. Duration of the activity which is likely to cause disturbance.
4. Proximity to areas used by SPA birds, both within the designated site boundary and/or within functionally linked land.

Where it is not clear that the proposed development will not lead to significant disturbance impacts to Humber Estuary birds, a more detailed assessment should be carried out in the appropriate assessment.

The appropriate assessment should consider:

1. Predicted noise levels (including detailed noise assessments, where relevant).
2. The existing noise levels and other sources of acoustic and visual disturbance at the site. Prediction of the baseline may incorporate data from other relevant projects in the area, alongside any relevant sources of information around standard industrial noise levels.

3. The type of potential effect (masking of acoustic signals by road noise, adverse behavioural changes such as disturbance to feeding and displacement from important habitats due to loud, sporadic noises, etc.).
4. The number of birds present in proximity to the works and potential sensitivity of the receptor birds depending on their activities (breeding, foraging, roosting), numbers, species etc. This should be informed by suitable data, such as WeBS data and/or site-specific bird surveys to assess the relative importance of the area to Humber birds.
5. Visual disturbance, including machinery and personnel. Visual disturbance combined with increased noise levels can increase risk of disturbance.
6. Lighting impacts, including whether additional lighting will be introduced into previously unlit areas, predicted levels of light spill and potential interaction with areas used by significant numbers of birds.

The 1% 'rule of thumb' can form part of the assessment of bird numbers but should not be relied upon alone to reach a conclusion.

Natural England can discuss further advice on noise assessments and mitigation measures with Local Planning Authorities on request or with applicants via DAS.

Annex C: Standard Advice for Air Quality Impacts in Nationally Significant Infrastructure Projects (NSIPs)

Natural England provides the following standard advice on air pollution. This advice relates to the protection of protected sites under the Conservation of Habitats and Species Regulations 2017 (the Habitats Regulations) and the Wildlife and Countryside Act 1981 and should be taken as Natural England's formal representation. This standard advice is applicable to all stages of the NSIP process and may be used by the applicant for NSIP pre application stages, by the Examining Authority (ExA) during the statutory stages of the NSIP and by the relevant Secretary of State as the competent authority.

Protected sites are 'sites of special scientific interest' (SSSIs) and 'habitats sites' (also called 'European sites'). For the purposes of this advice, Habitats Sites are Special Areas of Conservation (SACs), possible SACs, Special Protection Areas (SPAs), Potential SPAs, Ramsar sites, and sites identified, or required, as compensatory measures for adverse effects on Habitats Sites. Although their regulatory frameworks differ, the general principles and approach for air pollution assessment outlined for Habitats Sites are also relevant for SSSIs. Where the following advice applies to both, we use the term protected sites. Where the advice or approach differs, the individual terms are used.

This includes advice on information that is required to assess this and how to interpret the results of air quality modelling for the decision maker to conclude whether air quality impacts would have an adverse effect on the integrity of a Habitat site or a SSSI. You should also consider any relevant caselaw that could affect how you carry out any air quality assessments.

Air pollutants

This advice covers the following air pollutants from the construction, operation and decommissioning phases of a proposal

- ammonia (NH₃)
- nitrogen oxides (NO, NO₂ or NO_x)
- nitrogen deposition
- acid deposition
- sulphur dioxide (SO₂)

Standing advice on air pollution and development is also available here:

<https://www.gov.uk/guidance/air-pollution-and-development-advice-for-local-authorities>

Whilst the standing advice does not cover NSIPs, it does include additional technical advice which may prove useful. However, in summary, Table 1 provides the steps that we advise should be taken to assess air quality impacts on protected sites. The applicant should provide their own assessment containing the information and detailed modelling you need. You need to review this and make your own conclusion.

Table 1: Sequential approach to air quality assessments

Stage	Step	Supplemental evidence/ basis for judgment
Initial screening for credible risk of an effect	1 Check Distance criteria - could significant emissions reach a protected site? Yes = move to Step 2 No = no further HRA required	The Air Pollution Information System (APIS) includes an introduction to air pollution. APIS provides site specific information on the interest features of individual protected sites and the sensitivity to air quality impacts of

			those features. Please see Table 2 for industrial air pollution screening distances. For road traffic impacts, roads on the affected road network that lie within 200m of a designated site should be considered. Use Magic Map to check the location of designated sites. Search for the location then select the 'Designations' option.
	2	Check if the qualifying habitats or supporting habitat of qualifying species are sensitive to air quality impacts. Yes = move to Step 3 No = no further HRA required APIS Site relevant Critical Loads and Levels (based on literature and professional judgement) http://www.apis.ac.uk/srci Some habitats may not have a critical load because there is not enough data. In these cases, you should find the critical load for a similar habitat type or feature.	The qualifying features of Habitats Sites can be identified in the relevant Site Conservation Objectives and Supplementary advice packages, which include a definitive list of legally qualifying features. These objectives are available here. Alternatively, a list of qualifying features can also be found by searching for the Habitats Site and SSSIs on Designated Sites View, alongside Conservation Objectives and Supplementary Advice for Habitats Sites. The above links will also show whether any of the qualifying features for Habitats Sites have a Restore or Maintain Conservation Objective in relation to air quality thresholds (critical levels or loads). If the site is a SPA or an SAC/SSSI designated for an animal species (as opposed to a habitat), determine whether the predicted pollution effects on the supporting habitat will have a negative effect on the notified species.
Detailed AQ modelling	3	Undertake detailed modelling using a recognised dispersal model – i.e. Atmospheric Dispersion Modelling System (ADMS) Unless robust site-specific evidence is provided, we advise the lower range of the critical load should be used in modelling. If there are site specific reasons why it is more appropriate to use the higher end of the range, then this should be clearly evidenced.	Air Quality modelling should include relevant scenarios that are clearly identified. One such example of scenarios is a baseline plus future forecasts as follows: Baseline, a construction year, and future operational year(s), do nothing (without proposal), do something (with proposal); taking into account background trends for each pollutant). For proposals that will emit pollutants from a point source, it is helpful to provide isopleths of the dispersion modelling results, showing the predicted contours of pollutant concentration and deposition of the development. These may be assessed against the locations of protected sites and sensitive features within those sites. At least 3 years of meteorological data should be included within the AQ modelling for sources other than for road transport modelling The Institute of Air Quality Management (IAQM) has produced the following document to assist its members in the assessment of the air quality impacts of development on designated nature conservation sites: air-quality-impacts-on-nature-sites-2020.pdf

Applying screening thresholds	4a	Apply Screening Threshold Alone If below threshold alone, move to step 4b. If above = move straight to step 5	Ascertain the Process Contribution (PC) from the plan or project (emissions and predicted deposition). Apply Screening threshold (1% of critical level or load) alone using the <u>annual averages</u>. If the process contribution is less than 1% of the relevant long-term benchmark (Environmental Assessment Level, Critical Level or Critical Load), the emission is not likely to have a significant effect <u>alone</u> irrespective of the background levels.
	4b	Apply Screening Threshold In-combination. If below threshold in-combination = no LSE/significant risk of damage etc and no further assessment required. If above = move straight to step 5 Applicants might use the Joint Nature Conservation Committee (JNCC) 'decision-making thresholds' as a reason for not completing an in-combination assessment. If so, you should check they have correctly followed the JNCC guidance on decision-making thresholds. If this guidance shows they do not need to complete an in-combination assessment, continue to step 5. If applicants have not used the decision-making thresholds, or have not followed them correctly, they will need to provide an in-combination assessment.	Use information from competent authorities (Planning Portal, PINS NSIP register or Environmental Permitting register) to determine if there are plans or projects in the pipeline (not included in the current baseline) that should be considered in-combination If the combined process contribution is less than 1% of the relevant long-term benchmark (Environmental Assessment Level, Critical Level or Critical Load), the emission is not likely to have a significant effect <u>in-combination</u> irrespective of background levels.
Detailed Assessment of ecological impacts	5	This step is to consider the ecological impacts of AQ on the interest features of the designated site and is not based only on numerical figures. If it is not certain whether sensitive features are located within the areas to be impacted, a site visit may be helpful to determine this. For SSSIs, this step should provide all the information necessary, including any required mitigation, for the decision maker to determine if there would be an adverse effect on a SSSI. If Habitats Sites are impacted by the proposals, move to Step 6.	The following information is likely to be helpful for the decision maker: Is the sensitive feature(s) located within the pollution footprint? Should it be there for the site to meet its Conservation Objectives or is there some other, natural reason (e.g. hydrology), why the sensitive feature(s) would not be expected to occur there? Check APIS Trends Tab for reasonable expectation on whether background pollution may be decreasing or not. Habitats that have already been subject to high background nitrogen deposition can develop tolerance to further deposition. This cannot be used to justify further exceedance as it would undermine conservation objectives to reverse decline. You should consider predicted effects on the species richness of a habitat against the site's conservation objectives.
Appropriate Assessment	6	The competent authority to undertake their AA to conclude	Where mitigation is required to enable a conclusion of no adverse effect on integrity to

(AA) for habitats sites	whether or not there will be an adverse effect on integrity (AEOI) of habitats sites. Any mitigation proposed should also be assessed at this point. Should the AA conclude that the proposal would have an AEOI that cannot be excluded with mitigation measures, consider the derogation route of the HRA process. Should compensation measures be required under derogation, please contact Natural England for specific advice. Note: If an AA has been undertaken of the proposals <u>alone</u> and concluded that there will not be an adverse effect on integrity, if there are residual impacts that are not fully mitigated, these will need to be considered in combination with other plans or projects	be reached the AA must be able to show that mitigation measures can be relied upon to avoid adverse effects over the full lifetime of the project (ie construction, operation and decommissioning where relevant). To be viable, such measures should be effective, reliable, timely, guaranteed and of sufficient duration. The assessment of such measures should be supported by evidence. When deciding on whether the proposals set out in the NSIP will have an adverse effect on Integrity on a Habitats Site, the Conservation Objectives and any supplementary advice should be taken into account. Including whether the site is already exceeding the environmental thresholds for ammonia, nitrogen oxides and nitrogen deposition and has a restore conservation objective.
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Mitigation measures

If you cannot conclude there is no adverse effect, the applicant will need to apply mitigation measures. Measures will only be appropriate if you can quantify their effectiveness in reducing emissions on the protected site. You should check that mitigation measures are in place to avoid adverse effects on site integrity over the lifetime of the project.

Mitigation may include measures that:

- the applicant volunteers
- you impose through formal conditions or restrictions in any permission or authorisation – these may be different or stricter measures than ones proposed by the applicant

Examples could include:

- relocation or redesign of developments to avoid impacts on protected sites
- control of other emissions of the same pollutants with an overlapping effect
- a change in stack height for industrial processes
- Euro 6 standards for construction machinery
- adding wooded shelterbelts, trees, green walls and hedges to limit dispersal of emissions, as long as these measures in themselves would not negatively impact the protected site

Table 2: Industrial air pollution screening distances

Emission source	Distance for SSSIs	Distance for habitats sites
Industrial developments	2km	5km
General combustion processes (under 20MW energy input)	500m	500m

General combustion processes (20MW to 50MW energy input)	2km	2km
General combustion processes (over 50MW energy input)	2km	10km
Mechanical and biological waste treatment	500m	500m
Landfill waste	2km	2km
Compost (under 500 tonnes maximum annual operational throughput)	500m	500m
Compost (500 to 75,000 tonnes maximum annual operational throughput)	1km	1km
Compost (over 75,000 tonnes maximum annual operational throughput)	2km	2km
Airports, helipads and other aviation proposals	5km	5km
Oil and gas exploration and extraction	500m	500m
Quarries	200m	200m
Other industrial developments causing air pollution	500m	500m

Additional advice

Common Standards Monitoring³ is used to define the ecological condition of a protected site. It is undertaken on a broader level and does not currently consider air quality impacts. The relevant benchmark for assessing impacts is the critical thresholds. Therefore, the existing status of a designated site should not be the sole reason for judgement on potential impact.

For many protected sites, the current background pollution may already be exceeding the relevant critical load/level from a different source type to the project being assessed (e.g. where the main source of background exceedance is due to agriculture, but the proposal is an industrial project). Proposals must consider their own impacts against the relevant environmental thresholds. There are many reasons why background levels are high, but the conservation objective is to 'maintain or restore' air pollutants to within these benchmarks. The objective would be undermined by proposals that add further emissions, including if it compromises any strategic initiatives to reduce air pollution levels.

You must determine if there is evidence that the increased emissions represent a measurable risk and could compromise the strategic initiatives. You would need to consider information on:

- the extent to which any declining national trends in air pollution, or strategic initiatives to tackle emissions affecting the site more locally, might otherwise lead to improvements
- the rate at which such improvements are anticipated
- the extent of the impacts of a plan or project, and whether those impacts can properly be considered temporary and reversible

³ [Common Standards Monitoring | Advisor to Government on Nature Conservation | JNCC](#)

If the affected area is small, consider the risk to site integrity proportionally. For example, how important is the area in terms of rarity, location, distribution, vulnerability to change and ecological structure. If it is a supporting habitat, consider its importance to the designated species on the site. Consider any site survey information that may provide evidence of existing impacts.

Emissions from road transport (if applicable):

Emissions from road transport may be an operational impact or be limited to the construction phase of proposals. Roads on the affected road network that lie within 200m of a designated site should be considered. If all affected roads are further than 200m from a protected site, then there is no likely significant effect (habitats sites) or no impact (SSSIs) on protected sites from air pollution

Improvements in vehicle technology and a move to further electrification of the vehicle fleet will, over time, result in lower background levels of nitrogen deposition and nitrogen oxide pollution near to roads. As most sites are currently over the relevant thresholds and have a “restore” objective, this should be noted as a “retardation” of the restore objective and expressed in months and years. Retardation of less than one year is acceptable as air quality is considered against an annual average. Please note that ammonia impacts cannot be assessed in this manner as there is no certainty of a declining trend.

Defra Emissions Factor Toolkit

The Defra Emission Factor Toolkit (EFT) allows for gradual introduction of electric vehicles into the fleet (cars and LGVs) up to 2050. These are the emission factors we advise that NSIPs should be using (which we advise should also consider ammonia emissions as well as NO_x – using one of three sets of emission factors available). However, the User Guide to the EFT highlights that calculation tools only support assessment years 2018 up to 2030, reflecting that predictions and assumptions beyond then become less certain. Where EFT calculated emissions are to be used after 2030 to inform air quality assessments, the EFT indicates that appropriate caveats around the limitations of the analysis must be included to accompany the assessment. We therefore advise that emission factors no later than 2030 are used for HRAs – which would mean percentages of EVs are at predicted 2030 levels. A key concern is that, although EVs themselves have no tailpipe emissions, and the percentage of them will increase, the remaining combustion engine vehicles on the road may become more polluting as they age as selective catalytic reduction technology may create ‘ammonia slip’ over time. Ammonia slip is the unreacted ammonia (NH₃) that escapes from a selective catalytic reduction (SCR) or selective non-catalytic reduction (SNCR) system used to reduce NO_x in exhaust gases.

Motorways within the affected road network

There is potentially an added complexity to the need for in-combination assessments when considering traffic on motorways, as including these roads can mean that the assessment takes account of traffic growth related to strategic factors or long range (external) trips that are independent of the specific plan or project and neighbouring plans or projects. These roads are strategically important and tend to have high volumes of traffic as well as being well represented in traffic models. The air quality assessment should therefore include traffic flows on these roads, but the external trips can be excluded from the initial screening assessment. A justification and explanation of which journeys are included and excluded in the traffic model should be provided.

The conclusions reached on the air pollution impacts of the HRA must be incorporated into the wider HRA conclusions for other impact pathways identified for the proposals.

How to Use this Advice in Decision Making

Provided you have followed the above advice and have been able to conclude there would be no adverse effects on any protected sites we would be able to agree with your decision to authorise the project

Officer: [REDACTED]
Tel: [REDACTED]
[REDACTED] [@northlincs.gov.uk](mailto:[REDACTED]@northlincs.gov.uk)

19/06/2026

Environmental Services
Infrastructure Decisions and Applications Service
Planning Inspectorate
c/o QUADIENT
69 Buckingham Avenue
Slough
SL1 4PN

North Lincolnshire Council

www.northlincs.gov.uk

Church Square House
30-40 High Street
Scunthorpe
North Lincolnshire
DN15 6NL

North Lincolnshire Planning Application Reference: DCO/2026/7

Planning Inspectorate Reference: EN0710006

Project: Humber Hydrogen Pipeline

Proposal: Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (The EIA Regulations) – Regulations 10 and 11

Proposed application by Humber Hydrogen Transmission System Ltd (the applicant) for an Order granting Development Consent for the Humber Hydrogen Pipeline (the proposed development)

Scoping consultation and notification of the applicant's contact details and duty to make available information to the applicant if requested

Officer: [REDACTED]

Thank you for your email dated 22nd May 2026 giving North Lincolnshire Council (NLC) the opportunity to comment on the Humber Hydrogen Pipeline Scoping consultation.

I can confirm that after consultation with our internal technical consultees that North Lincolnshire Council has the following comments to make:

Environmental Protection: The team have the following comments to make on the information submitted:

Contaminated Land: This department agrees with this conclusion and anticipates a Preliminary Risk Assessment (phase 1 desk top study) be submitted with any forthcoming application.

Noise: This department is satisfied with the approach put forward regarding noise.

Air Quality: This department is satisfied with the above approach and would suggest a review of data at the following website where required: <https://nlincsair.info/>

Public Right of Way: My only concern is where the pipeline enters North Lincolnshire, which appears to be in the vicinity of East Halton Skitter. Public Footpath 50 runs along the bank of the Humber at this location; it is also the route of the recently inaugurated King Charles III England Coast Path national trail.

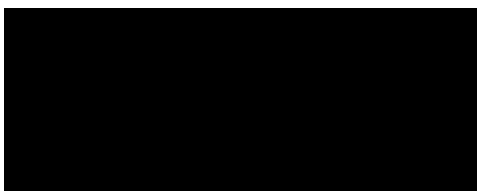
Providing the effect of the pipeline on the use by the public on foot of the Humber bank can be mitigated, before, during and after works, I should hope all should be well in that regard. I think it important, however, that both the applicant and the Planning Inspectorate be alerted to the need to take the England Coast Path into account at the earliest opportunity to give North Lincolnshire Council an understanding on behalf of the public locally as to what form we can expect mitigation to take and the efficacy of such.

Conservation: For the part of this in our area there are no designated built heritage assets in the area, some just on border but I don't think these would need scoping in from my understanding of the site.

I am still awaiting comment from other technical consultees of the council but would comment that the proposed area lies on the banks of the Humber estuary and in close proximity to the Humber Estuary Special Protection Area (SPA) and Special Area of Conservation (SAC). The site is also listed as Humber Estuary Ramsar site and also notified at a national level as Humber Estuary Site of Special Scientific Interest (SSSI). It is recommended that dialogue with Natural England is commenced as soon as possible to discuss the development.

I will forward on the missing consultations as soon as they are received. Any questions please contact me on the details at the top of this letter.

Kind Regards



Senior Planning Officer
North Lincolnshire Council



Humber Hydrogen Transmission System Ltd
c/o Planning Inspectorate

Planning Services (Selby Area)
North Yorkshire Council
Civic Centre
Doncaster Road
Selby
North Yorkshire
YO8 9FT
Email: ppu.sel@northyorks.gov.uk
Tel: 0300 1312131
Web: www.northyorks.gov.uk

Our Ref ZG2026/0481/CPO
Date 5 June 2026

Dear Sir/Madam

Your Ref: EN0710006

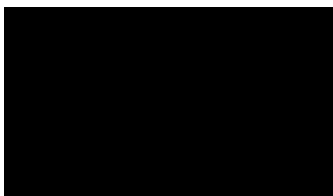
Planning Act 2008 (as amended) and the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) – Regulations 10 and 11

Proposed application by Humber Hydrogen Transmission System Ltd (the applicant) for an Order granting Development Consent for the Humber Hydrogen Pipeline (the proposed development)

Scoping consultation and notification of the applicant's contact details and duty to make available information to the applicant if requested

Further to your letter dated 22nd May 2026, North Yorkshire Council has no comments.

Yours faithfully,



Head of Development Management

Fw: EN0710006 - Humber Hydrogen Pipeline - EIA Scoping and Consultation

From [REDACTED]@planninginspectorate.gov.uk>

Date Mon 2026-06-29 14:57

To [REDACTED]@planninginspectorate.gov.uk>



Planning Inspectorate
Arolygiaeth Gynllunio

[REDACTED] (Hons)

NSIP Assistant Case Officer
Planning Inspectorate

[REDACTED] | Helpline: 0303 444 5000

 @PINSgov  Planning Inspectorate  planninginspectorate.gov.uk

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From: [REDACTED]

Sent: Monday, June 22, 2026 09:53

To: Humber Hydrogen Pipeline

Subject: Fw: EN0710006 - Humber Hydrogen Pipeline - EIA Scoping and Consultation

You don't often get email from nina.wilson@nottsccl.gov.uk. [Learn why this is important](#)

Dear Jack,

Thank you for consulting Nottinghamshire County Council on the above project, we have no comments to make.

Regards

[REDACTED]

Principal Planner (Policy)



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County Council**

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Proposed DCO Application by Humber Hydrogen Transmission System Ltd for Humber Hydrogen Pipeline

Royal Mail response to EIA Scoping Consultation

Under section 35 of the Postal Services Act 2011, Royal Mail has been designated by Ofcom as a provider of the Universal Postal Service. Royal Mail is the only such provider in the United Kingdom. The Act provides that Ofcom's primary regulatory duty is to secure the provision of the Universal Postal Service. Ofcom discharges this duty by imposing regulatory conditions on Royal Mail, requiring it to provide the Universal Postal Service.

Royal Mail's performance of the Universal Service Provider obligations is in the public interest and should not be affected detrimentally by any statutorily authorised project. Accordingly, Royal Mail seeks to take all reasonable steps to protect its assets and operational interests from any potentially adverse impacts of proposed development.

Royal Mail and its advisor Strutt & Parker have reviewed the EIA Scoping Report dated May 2026. There are 5 operational Royal Mail properties within 10km of the proposed scheme.

The construction of this infrastructure proposal has been identified as having potential to impact on Royal Mail operational interests, particularly given the impact the proposed development could have on the Strategic Road Network. However, at this point in time Royal Mail is not able to provide a consultation response due to insufficient information being available to adequately assess the level of risk to its operation and the available mitigations for any risk. Consequently, Royal Mail wishes to reserve its position to submit a consultation response/s at a later stage in the consenting process and to give evidence at any future Public Examination, if required.

In the meantime, any further consultation information on this infrastructure proposal and any questions of Royal Mail should be sent to:

██████████@royalmail.com), Senior Planning Lawyer, Royal Mail Group Limited

██████████@struttandparker.com), Strutt & Parker.

Please can you confirm receipt of this holding statement by Royal Mail.

End

Jack Patten

From: Sphere Enquiries <enquiries@sphere-connections.co.uk>
Sent: 29 May 2026 08:56
To: Humber Hydrogen Pipeline
Subject: Re: NSIP - Humber Hydrogen Pipeline - EIA Scoping and Consultation

Follow Up Flag: Follow up
Flag Status: Flagged

Hi Hannah

Thank you for taking the time to share these details with us.

I can confirm that Sphere Energy Connect has no assets in the vicinity of these works and have no comments to make at this time. We are a new IDNO business just entering the market and still completing Regulatory processes in order for us to operate an asset base within the UK.

Good luck with the project.

Thanks



[Redacted] | Head of Asset Management & Operations | Sphere
Energy Connect
E: [Redacted]@sphere-connections.co.uk | M: [Redacted]

Internal Use

From: Humber Hydrogen Pipeline <HumberHydrogenPipeline@planninginspectorate.gov.uk>
Sent: 27 May 2026 15:38
To: Sphere Enquiries <enquiries@sphere-connections.co.uk>
Subject: NSIP - Humber Hydrogen Pipeline - EIA Scoping and Consultation

EXTERNAL SENDER: Be cautious, especially with links and attachments. Report phishing if suspicious.

Dear Sir/Madam

Please see attached correspondence on the proposed Humber Hydrogen Pipeline.

The applicant for the proposed development intends to make an application for Development Consent under the Planning Act 2008. The applicant has sought a Scoping Opinion from the Planning Inspectorate, on behalf of the Secretary of State, as to the scope and level of detail of the information to be provided within the Environmental Statement that will accompany its future application.

The Planning Inspectorate has identified you as a consultation body to inform the Scoping Opinion and is therefore inviting you to submit comments by **23 June 2026**. The deadline is a statutory requirement that cannot be extended.

Further information is included within the attached letter.

Kind regards
Hannah

Please note my working days are Monday to Thursday. I do not work on Fridays.



Hannah Terry
Senior Environmental Advisor
Planning Inspectorate

 @PINSgov  Planning Inspectorate  planninginspectorate.gov.uk

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DPC:76616c646f72



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UK Health Security Agency

Environmental Hazards and Emergencies Department
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London Road
Nottingham, NG2 4LA

nsipconsultations@ukhsa.gov.uk
www.gov.uk/ukhsa

Your Ref: EN0710006
Our Ref: 95213

Ms Hannah Terry
Senior Environmental Advisor
Environmental Services
Infrastructure Decisions and Applications Service
Planning Inspectorate
c/o QUADIENT
69 Buckingham Avenue
Slough SL1 4PN

19th June 2026

Dear Ms Terry,

**Nationally Significant Infrastructure Project
Humber Hydrogen Project, EN0710006.
Scoping Consultation Stage**

Thank you for including the UK Health Security Agency (UKHSA) in the scoping consultation phase of the above application. ***Please note that we request views from the Office for Health Improvement and Disparities (OHID) and the response provided below is sent on behalf of both UKHSA and OHID.*** The response is impartial and independent.

The health of an individual or a population is the result of a complex interaction of a wide range of different determinants of health, from an individual's genetic make-up to lifestyles and behaviours, and the communities, local economy, built and natural environments to global ecosystem trends. All developments will have some effect on the determinants of health, which in turn will influence the health and wellbeing of the general population, vulnerable groups and individual people. Although assessing impacts on health beyond direct effects from for example emissions to air or road traffic incidents is complex, there is a need to ensure a proportionate assessment focused on an application's significant effects.

Having considered the submitted scoping report, we wish to make the following comments:

Environmental Public Health

We recognise the promoter's proposal to include a health section. We believe the summation of relevant issues into a specific section of the report provides a focus which ensures that public health is given adequate consideration. The section should summarise key information, risk assessments, proposed mitigation measures, conclusions and residual impacts relating to human health. Compliance with the requirements of National Policy Statements and relevant guidance and standards should also be highlighted.

In terms of the level of detail to be included in an ES, we recognise that the differing nature of projects is such that their impacts will vary. UKHSA and OHID's predecessor organisation Public Health England produced an advice document *Advice on the content of Environmental Statements accompanying an application under the NSIP Regime*¹, setting out aspects to be addressed within the Environmental Statement¹. This advice document and its recommendations are still valid and should be considered when preparing an ES. Please note that where impacts relating to health and/or further assessments are scoped out, promoters should fully explain and justify this within the submitted documentation.

Air Quality

Our position is that pollutants associated with road traffic or combustion, particularly particulate matter and oxides of nitrogen are non-threshold; i.e., an exposed population is likely to be subject to potential harm at any level and that reducing public exposure to non-threshold pollutants (such as particulate matter and nitrogen dioxide) below air quality standards will have potential public health benefits. We support approaches which minimise or mitigate public exposure to non-threshold air pollutants, address inequalities (in exposure) and maximise co-benefits (such as physical exercise). We encourage their consideration during development design, environmental and health impact assessment, and development consent.

Electromagnetic Fields (EMF)

It is noted that the current proposals do not appear to consider possible health impacts of Electric and Magnetic Fields (EMF)

UKHSA requests that the proposer confirms either that the project does not contain any EMF sources that may have a potential public health impact; or ensure that an appropriate assessment of the possible impact is included in the ES. For information on carrying out an

¹
<https://khub.net/documents/135939561/390856715/Advice+on+the+content+of+environmental+statements+accompanying+an+application+under+the+Nationally+Significant+Infrastructure+Planning+Regime.pdf/a86b5521-46cc-98e4-4cad-f81a6c58f2e2?t=1615998516658>

assessment, please see the document entitled, Advice on the content of Environmental Statements accompanying an application under the NSIP Regime¹

Yours sincerely,

On behalf of UK Health Security Agency

Please mark any correspondence for the attention of National Infrastructure Planning Administration.



Guildhall
Marshall's Yard
Gainsborough
Lincolnshire
DN21 2NA

Hannah Terry
Humber Hydrogen Pipeline
Planning Inspectorate
1, KINGDOM STREET,
LONDON,
W2 6BD

Telephone 01427 676676
Web www.west-lindsey.gov.uk
Planning.customer.care@west-lindsey.gov.uk
Date: 15/06/2026

Dear Sir/Madam

Application Number: WL/2026/00477

Proposal: PINS consultation on behalf of the Secretary of State for its opinion (a Scoping Opinion) as to the information to be provided in an Environmental Statement - EN0710006

Location: Humber Hydrogen Pipeline

Dear Ms Terry,

Many thanks for your letter dated 22nd May 2026 with reference to an Environmental Impact Assessment in accordance with Planning Act 2008 (as amended) and the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) – Regulations 10 and 11

Given the location of the proposed development in relation to West Lindsey District and the nature of the works outlined we do not have any formal comments to make at this stage with regards to the scoping opinion at this stage.

Yours faithfully

[Redacted Signature]

[Redacted Email Address]@west-lindsey.gov.uk

On behalf of West Lindsey District Council

If you require this letter in another format e.g. large print, please contact Customer Services on 01427 676676, by email customer.services@west-lindsey.gov.uk or by asking any of the