Planning Inspectorate
Arolygiaeth Gynllunio

SCOPING OPINION:

Proposed East Coast Hydrogen Humber Pipeline

Case Reference: EN0710008

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

26 June 2026

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1. INTRODUCTION

1.0.1 On 18 May 2026, the Planning Inspectorate (the Inspectorate) received an application for a Scoping Opinion from Northern Gas Networks (the applicant) under regulation 10 of The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (The EIA Regulations) for the proposed East Coast Hydrogen Humber 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/EN0710008/documents

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

(Scoping Report Chapters 3 and 4)

ID	Ref	Description	Inspectorate's comments
2.1.1	Paragraph 3.2.2	Red line boundary	The applicant states that additional land beyond the scoping boundary may be required and that this will be determined prior to the submission of the draft Development Consent Order (dDCO). If there are any additional works included at a later date that could lead to any material difference to the project description, and if the additional land leads to different effects, then the Inspectorate advises that a new scoping request may need to be submitted.
2.1.2	Paragraph 4.2.1	Worst-case scenario	It is noted that a number of elements of the proposed development have not yet been finalised, including the location of the new hydrogen pipelines, Above Ground Installations (AGI), ecological mitigation land, depth of the proposed pipeline, and construction compounds. Where there is optionality left in the design of the proposed development, the ES should consider a worst-case scenario in terms of potential environmental impact.
2.1.3	Paragraph 4.5.9	Natural gas pipelines	The applicant states that sections of new natural gas pipeline may be required where the existing is to be repurposed for hydrogen pipeline. The ES should identify where these sections are, if possible, and include details of the worst-case scenario based on new natural gas pipelines being required.
2.1.4	Paragraph 4.5.12	Construction working depth	The ES should define the applicable parameters for the construction working width and the pipeline trenches, including depth, or apply a reasonable worse case. It should be clear how these parameters are secured through the dDCO. Where significant effects are identified, the ES should set out the measures proposed to avoid, mitigate or compensate for such effects including, where appropriate, the

ID	Ref	Description	Inspectorate's comments
			specification of construction methods and/ or limitations placed on construction activities, and how this would be secured.
2.1.5	Paragraph 4.11.1	Design life	The ES states that the design life is 50 years for new build pipeline and 40 years for repurposed pipelines, it is unclear how the proposed development will continue to operate should the elements of pipeline degrade at different times. The ES should demonstrate the worst-case scenario and consider the design life of the development as a whole.
2.1.6	Section 4.11	Decommissioning	The Scoping Report does not provide substantive detail regarding how decommissioning will be assessed within the ES. A Decommissioning Environmental Management Plan (DEMP) should accompany the ES, and be secured through the dDCO, and should be developed in accordance with guidelines and regulations in place at that time. It is considered that the ES should provide a description of the activities and works (including the anticipated duration) which are likely to be required during decommissioning. The ES should be clear as to how decommissioning will be assessed overall for the proposed development as well as on an aspect-by-aspect basis. Where the approach is taken that effects during decommissioning would be similar to those expected during construction, the ES should set out how a change in baseline, due to the number of years passed since the proposed development was constructed, and how this would be taken into account.

2.2 EIA Methodology and Scope of Assessment

(Scoping Report Sections 5-7)

ID	Ref	Description	Inspectorate's comments
2.2.1	Section 7.7	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', links for which can be found in paragraph 1.0.7 above.
2.2.2	N/A	Thermal effects	The Scoping Report does not discuss the temperature of the pipeline during operation, and it is unknown whether there would be potential for thermal effects to surrounding soils. The ES should determine whether there would be a potential impact pathway for thermal or cooling effects to the soils surrounding the proposed

ID	Ref	Description	Inspectorate's comments
			development infrastructure. Where a pathway exists, the ES should include an assessment of likely significant effects (LSE).
2.2.3	N/A	Pipeline exposure	The Scoping Report does not consider the potential for the exposure of the pipeline due to increased rainfall intensity. The ES should consider the implications of the exposure of pipeline during operation and/or decommissioning. The methods of reburial should be considered within the relevant management documents. The applicant's attention is drawn to the consultation response from the Environment Agency (EA) (Appendix 2 of this Opinion) regarding this matter.
2.2.4	N/A	Unscheduled/ emergency maintenance	The Inspectorate considers that excavation and ground disturbance may be required during the operational phase if a defect in the pipeline is identified and emergency repairs are needed. As such, unscheduled emergency maintenance activities could result in significant impacts. The ES should therefore set out the scope and nature of these activities and include an assessment of any LSE where appropriate.
2.2.5	N/A	Mitigation and monitoring	The ES should clearly describe the details of any necessary avoidance and mitigation measures to be implemented, along with monitoring, reporting, and adaptive management procedures. These should be agreed, where possible, with relevant stakeholders and the ES should explain how they would be secured through the dDCO.

3. ENVIRONMENTAL ASPECT COMMENTS

3.1 Air quality

(Scoping Report Section 8.2)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.1.1	Section 8.2	Dust emissions – Decommissioning	The Inspectorate notes that the pipeline component of the proposed development is proposed to remain in-situ during decommissioning. It is therefore agreed that this matter can be scoped out for this component on the basis that no activities relating to the pipeline will be occurring during this phase. The Scoping Report proposes to scope out dust emissions from the AGI component during decommissioning on the basis that these impacts will be assessed at the time of decommissioning. Mitigation measures would be included within a separate decommissioning plan, but further detail is required in the ES to explain what these measures would entail. The ES should therefore provide information on the potential dust emissions at decommissioning and the sensitivity of the human and ecological receptors to support a conclusion that this matter would not give rise to significant effects. The Inspectorate directs the applicant to comments in ID 2.1.6 of this Opinion, regarding decommissioning and therefore does not agree to scope out this matter based on the information provided.
3.1.2	Section 8.2	Vehicle movements – Operation and decommissioning	The Scoping Report proposes to scope out air quality impacts from vehicle movements from all elements of the proposed development during operation, on the basis that operational traffic effects are expected to be negligible. On this basis, the Inspectorate is content that operational effects can be scoped out of the ES. However, the ES should confirm the vehicle types and likely number and routing of vehicle movements required during for operation (with reference to thresholds within guidance) to justify this position.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			This matter is also proposed to be scoped out on the basis that effects from decommissioning would be less than those at the construction phase. However, it is stated that there is limited detail on construction traffic routes and flows available at this stage, and therefore the Inspectorate is unable to scope this matter out at this stage. The ES should clearly set out the vehicle types and likely number and routing of vehicle movements required for decommissioning, and provide an assessment of LSEs.
3.1.3	Section 8.2	Operational emissions	This matter is proposed to be scoped out of the ES on the basis that the release of hydrogen emissions through venting would be minimal and would readily disperse due to the light density of the gas. The Inspectorate agrees with this approach and that hydrogen leakage would be unlikely to give rise to significant effects for air quality for all stages of the proposed development and is therefore content to scope this matter out of further assessment. However, considering that there is limited information provided on potential effects of hydrogen leakage upon atmospheric composition, including any impacts upon methane concentration and ozone formation, the ES should clearly demonstrate consideration of potential air quality implications from this. Additionally, paragraph 4.10.2 states that pipeline inspections would only be undertaken every four years, and there is limited evidence to justify this frequency. Therefore, the ES should clearly address the monitoring of hydrogen leakage and set out the exact measures to minimise any potential leakages, and how these would be secured through the dDCO.

ID	Ref	Description	Inspectorate's comments
3.1.4	Section 8.2	Guidance	The applicant's attention is drawn to the Defra advice '$PM_{2.5}$ Targets: Interim Planning Guidance'. The ES should explain how key sources of air pollution within the

ID	Ref	Description	Inspectorate's comments
			proposed development have been identified and how action has been taken to minimise emissions of $PM_{2.5}$ or its precursors.
3.1.5	Section 8.2	Ecological receptors	When defining sensitive receptors, the applicant states that construction vehicles are unlikely to pass within 250m of the Humber Estuary SPA, SAC, Ramsar Sites and SSSI as the scoping boundary is 320m from the sensitive sites. Construction traffic does not operate solely within the scoping boundary and therefore, these sites should be included in the assessment, unless there is a clear demonstration within the ES and associated construction traffic management plan that the emissions from the affected road network will not affect sensitive sites. The applicant is directed towards the advice from Natural England (NE) at Appendix 2 of this Opinion, where guidance of 200m from the affected road network to sensitive sites should be used to identify significant effects.
3.1.6	Section 8.2	Baseline data	It is proposed to mostly use existing baseline air quality data and undertake targeted monitoring if required. The applicant is encouraged to agree this approach with the relevant local authorities.

3.2 Biodiversity and ecology

(Scoping Report Section 8.3)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.2.1	Section 8.3	Pipeline – Operation and decommissioning impacts	The Scoping Report proposes to scope out all impacts from the operation and decommissioning of the pipeline on the basis that routine maintenance of land above the pipeline during operation would be controlled through the Landscape Environmental Management Plan (LEMP) and would be unlikely to give rise to significant effects. The pipeline is also proposed to be left in-situ once operation has ceased. The Inspectorate notes that all potential impacts from AGI have been scoped into the ES. The Inspectorate is content with this approach. Effects on ecological receptors from the operation and decommissioning of the pipeline can be scoped out of the ES. See ID 2.2.4 regarding the Inspectorates position on unscheduled/ emergency maintenance.

ID	Ref	Description	Inspectorate's comments
3.2.2	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

ID	Ref	Description	Inspectorate's comments
			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.
3.2.3	Paragraph 4.3.1	Open-Cut/ Horizontal Directional Drilling (HDD)	Paragraph 4.3.1 of the Scoping Report indicates that HDD may be used to enable infrastructure crossings but does not mention watercourses. The Inspectorate considers that the ES should include the effects of HDD crossing watercourses on invertebrates, fish, and other aquatic species found in or in proximity to the drilling locations. Paragraph 4.5.11 also states that the construction of the pipeline would predominantly use open-cut methods. The Inspectorate considers that HDD should be used, where possible, to avoid the potential habitat loss that would result from open-cut methods. The applicant's attention is also drawn to the consultation response from the EA (Appendix 2 of this Opinion) regarding these matters.
3.2.4	Section 8.3	Noise and visual disturbance impacts to designated sites	The ES should consider potential noise and visual disturbance impacts on designated sites during construction and decommissioning where the proposed development is in close proximity. The applicant's attention is drawn to the consultation response from NE (Appendix 2 of this Opinion) regarding this matter.
3.2.5	Section 8.3	Hydrological impacts to designated sites	The Inspectorate notes that impacts from surface and ground water pollution are included in the list of potential construction impacts. This list should also include consideration of the potential for the proposed development to impact upon water supply connections to designated sites with a hydrological link during construction

ID	Ref	Description	Inspectorate's comments
			and operation. The applicant's attention is drawn to the consultation response from NE (Appendix 2 of this Opinion) regarding this matter.
3.2.6	Section 8.3	Migrating fish	The ES should consider the potential for direct and indirect impacts to migrating fish linked to the River Derwent SAC during construction and decommissioning. The applicant's attention is drawn to the consultation response from NE (Appendix 2 of this Opinion) regarding this matter.
3.2.7	Section 8.3	Functionally Linked Land (FLL)	It is noted that the loss of FLL is included in the list of potential construction impacts. The Inspectorate considers that the assessment of impacts on FLL should also include potential disturbance impacts such as acoustic, visual, vibration and artificial lighting. The applicant's attention is drawn to the consultation response from NE (Appendix 2 of this Opinion) regarding this matter.
3.2.8	Section 8.3	District Level Licensing (DLL)	The Scoping Report indicates that the applicant intends to offset the effects of the proposed development on great crested newts (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, NE 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.
3.2.9	Section 8.3	Invasive Non-Native Species (INNS)	The Scoping Report states that the Preliminary Ecological Assessment (PEA) will identify INNS and assess habitats for their potential to support notable species. For

ID	Ref	Description	Inspectorate's comments
			the avoidance of doubt, the ES should assess impacts to habitats, species and designated sites from the potential introduction/ spread of INNS.
3.2.10	Section 8.3	Environmental data sharing	The ES should clearly describe how environmental data collected in all phases of the proposed development, will be shared with the relevant Local Environmental Records Centre(s) and any relevant environmental recording schemes, in line with best practice, and how this will be secured through the dDCO.

3.3 Climate change and resilience

(Scoping Report Section 8.4)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.3.1	Section 8.4	Construction impacts	The Scoping Report proposes to scope construction impacts related to climate change out of the assessment. The applicant states that the expected construction period is 4 years and therefore does not anticipate substantial additional mitigation to be required beyond current best practice measures. On the basis that appropriate measures are secured through the CEMP to minimise potential risks from climate change, the Inspectorate agrees that this matter can be scoped out.
3.3.2	Section 8.4	Pipeline – Decommissioning impacts	The Scoping Report explains that further assessment of the future climate will be included in the ES for operation and decommissioning, however the applicant proposes to scope out effects from decommissioning in relation to the pipeline, as it will remain in-situ once operation has ceased. The Inspectorate cannot agree to scope this matter out at this stage as the scoping report does not consider the potential for exposure of the pipeline due to increased rainfall intensity. The ES should demonstrate that decommissioning of the pipeline takes into account climate change and considers implications of any exposure.

ID	Ref	Description	Inspectorate's comments
3.3.3	Section 8.4	Hydrogen leakage	The applicant's attention is drawn to the points raised in ID 3.1.3 regarding hydrogen leakage during operation. The ES should include information regarding the potential effects of hydrogen leakage upon atmospheric composition, including any impacts upon methane concentration and ozone formation, the ES should clearly demonstrate consideration of potential climate change implications from this.

3.4 Cultural heritage

(Scoping Report Section 8.5)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.4.1	Section 8.5	Temporary impacts to historic landscape character, designated and non-designated heritage assets as a result of the pipeline – Operation and decommissioning	The Scoping Report proposes to scope these matters out on the basis that once the proposed development is operational the pipeline would be below ground and left in-situ during decommissioning. Therefore, temporary impacts to heritage assets would be unlikely to occur. On this basis, the Inspectorate agrees that significant effects are not likely to occur and that these matters can be scoped out of the ES. See ID 2.2.4 regarding the Inspectorates position on unscheduled/ emergency maintenance.
3.4.2	Section 8.5	Temporary impacts to designated and non-designated heritage assets as a result of AGI (routine operation) – Operation	This matter is proposed to be scoped out on the basis that operational impacts through routine maintenance activities would be highly localised within the AGI compounds and works would be managed through an Operational Environmental Management Plan (OEMP). The Inspectorate agrees that routine maintenance activities would be unlikely to give rise to significant effects on heritage assets and that this matter can be scoped out of the ES. See ID 2.2.4 regarding the Inspectorates position on unscheduled/ emergency maintenance.
3.4.3	Section 8.5	Permanent impacts through change to the setting of designated and non-designated assets as a result of the pipeline – All phases	The Scoping Report proposes to scope this matter out on the basis that there will be no permanent changes to the setting of heritage assets as the pipeline will be buried post-construction and left in-situ during decommissioning. On this basis, the Inspectorate agrees that significant effects are not likely to occur. This matter can be scoped out of the ES.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.4.4	Section 8.5	Permanent impacts through change to the setting of designated and non-designated assets as a result of AGI – Construction and decommissioning	These matters are proposed to be scoped out on the basis that potential impacts during construction and decommissioning would be temporary. On this basis, the Inspectorate agrees that significant effects as a result of temporary impacts from the construction and decommissioning of the AGI are not likely to occur, these matters can be scoped out from the ES.
3.4.5	Section 8.5	Physical impacts to below ground archaeological remains as a result of the pipeline – Operation and decommissioning	These matters are proposed to be scoped out on the basis that no works that could impact buried archaeology are anticipated during the operation phase and the pipeline will be left in-situ during the decommissioning phase. On this basis, the Inspectorate agrees that physical impacts to buried archaeology as a result of the pipeline during the operation and decommissioning phases are unlikely to occur. These matters can be scoped out of the ES. See ID 2.2.4 regarding the Inspectorates position on unscheduled/ emergency maintenance.
3.4.6	Section 8.5	Physical impacts to below ground archaeological remains as a result of AGI – Operation and decommissioning	The Scoping Report proposes to scope these matters out on the basis that no works that could impact buried archaeology are anticipated during the operation phase and that impacts from the decommissioning of the AGI would be limited to previously disturbed areas and no greater than those occurring from the construction phase. On this basis, the Inspectorate agrees that significant effects resulting from these matters are unlikely. These matters can be scoped out of the ES.
3.4.7	Section 8.5	Temporary impacts on historic landscape character as a result of the AGI – Operation	This matter is proposed to be scoped out on the basis that no temporary changes to AGI are expected during operation and maintenance activities would be highly localised and managed via the OEMP. On this basis, the Inspectorate agrees that significant effects are not likely to occur. This matter can be scoped out of the ES.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			See ID 2.2.4 regarding the Inspectorates position on unscheduled/ emergency maintenance.
3.4.8	Section 8.5	Permanent impacts on historic landscape character as a result of the pipeline – Operation and decommissioning	These matters are proposed to be scoped out on the basis that landscape features would be fully re-instated as far as reasonably practicable, and the pipeline is proposed to be left in-situ during decommissioning. The Inspectorate considers that there remains the potential for significant effects through the loss of existing landscape features such as woodland, hedgerows, specimen trees and those which may occur as a result of planting restrictions introduced for any easement required. As such, the Inspectorate is not in a position to scope these matters out. The ES should consider the potential permanent impacts to historic landscape as a result of the operation and decommissioning of the pipeline.
3.4.9	Section 8.5	Permanent impacts on historic landscape character as a result of the AGI – Construction and decommissioning	The scoping report proposes to scope out permanent impacts on historic landscape character resulting from the construction and decommissioning of the proposed development on the basis that impacts during these phases would be temporary. On this basis, the Inspectorate agrees that significant effects are not likely to occur. These matters can be scoped out from the ES.

ID	Ref	Description	Inspectorate's comments
3.4.10	Section 8.5	Study area	It is noted that a study area of 1km has been proposed for designated heritage assets. The Inspectorate recommends that a flexible approach is adopted, based on the likely maximum extent of significant effects and utilising tools such as the Zone of Theoretical Visibility (ZTV). The Applicant's attention is drawn to the consultation response from Historic England (HE) regarding this matter (Appendix 2 of this Opinion).

3.5 Greenhouse gases

(Scoping Report Section 8.6)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.5.1	Section 8.6	Pipeline – Decommissioning	The Scoping Report proposes to scope out effects from decommissioning in relation to the pipeline, as it will remain in-situ once operation has ceased. The Inspectorate is content with this approach and agrees to scope this matter out.

ID	Ref	Description	Inspectorate's comments
3.5.2	Section 8.6	Hydrogen leakage	The applicant's attention is drawn to the points raised in ID 3.1.3 regarding hydrogen leakage during operation. The ES should include information regarding the potential effects of hydrogen leakage upon atmospheric composition, including any impacts upon methane concentration and ozone formation, the ES should clearly demonstrate consideration of potential greenhouse gas implications from this.

3.6 Ground conditions

(Scoping Report Section 8.7)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.6.1	Section 8.7	Geodiversity impacts (pipeline) – Operation and decommissioning	The Scoping Report seeks to scope out geodiversity impacts from the pipeline during operation and decommissioning. Limited information is presented in the Scoping Report for scoping out operational and decommissioning effects from the ES. The applicant's attention is drawn to the Inspectorates comments at ID 2.2.2 regarding thermal effects. On the basis that there is limited information to confirm that there would not be thermal effects to the surrounding soils from the pipeline during operation, the Inspectorate is unable to scope this matter out at this stage. See ID 2.2.4 regarding the Inspectorates position on unscheduled/ emergency maintenance. As the pipeline will be retained in-situ for the decommissioning phase, there is unlikely to be an impact pathway to significant effects. The Inspectorate agrees that this can be scoped out of the assessment.
3.6.2	Section 8.7	Geodiversity impacts (AGI) – All phases	The Scoping Report proposes to scope out geodiversity impacts from the AGI as they will be sited away from Regionally Important Geological Sites (RIGS). As the design of the proposed development has not reached the stage where the location of the AGI are finalised, the Inspectorate is unable to agree to scope this matter out at this stage. Should the final locations of the AGI, as should be described in the ES, not be sited close to RIGS, then this matter may be scoped out.
3.6.3	Section 8.7	Ground and water contamination – Operation and decommissioning	It is proposed to scope out all ground and water contamination effects for all components during operation and decommissioning due to the design specifications required, the use of a DEMP, and the pipeline remaining in-situ once operational.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			Regarding the pipeline, the Inspectorate is content to scope out these matters for operation and decommissioning on the basis that the pipeline will remain in-situ and therefore limited pathways to significant effects will be present. The Inspectorate is content to scope this matter out of the operational phase regarding the AGI component, on the basis that there will be limited operational works. However, the Inspectorate is not content to scope this matter out of the decommissioning phase, due to the uncertainty regarding the design of the works and limited information provided in the Scoping Report. See ID 2.2.4 regarding the Inspectorates position on unscheduled/ emergency maintenance.

3.7 Landscape and visual amenity

(Scoping Report Section 8.8)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.7.1	Section 8.8	Temporary effects to: • landscape character • Landscape Character Areas (LCAs) within the study area • people's views and visual amenity as a result of construction as a result of the pipeline – Operation and decommissioning	Temporary impacts to these receptors are proposed to be scoped out during the operation and decommissioning phases as the pipeline would be buried and left in-situ. On this basis, the Inspectorate agrees that significant temporary effects as a result of the operation and decommissioning of the pipeline would be unlikely to occur. These matters can be scoped out from the ES. See ID 2.2.4 regarding the Inspectorates position on unscheduled/ emergency maintenance.
3.7.2	Section 8.8	Temporary effects to landscape character and on the LCA within the study area as a result of the AGI – Operation	No rationale is provided for scoping out these matters. Nevertheless, the Inspectorate considers that significant temporary effects as a result of the AGI are not likely to occur during operation. This matter can be scoped out of the ES. See ID 2.2.4 regarding the Inspectorates position on unscheduled/ emergency maintenance.
3.7.3	Section 8.8	Long term effects on landscape character –	This matter is proposed to be scoped out due to the short-term nature of the construction and decommissioning phases. On this basis, the Inspectorate agrees

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
		Construction and decommissioning	that long term effects are not likely to occur during the construction and decommissioning phases of the proposed development. This matter can be scoped out of the ES.
3.7.4	Section 8.8	Long term effects on the LCA within the Landscape and Visual Impact Assessment (LVIA) study area – Construction and decommissioning	The Inspectorate agrees that long term effects are not likely to occur during the construction and decommissioning phases of the proposed development. These matters can be scoped out of the ES.
3.7.5	Section 8.8	Temporary disruption to people's views and visual amenity as a result of construction of the AGI – Operation	The Inspectorate agrees that temporary effects are not likely to occur during the operational phase of the proposed development. This matter can be scoped out of the ES. See ID 2.2.4 regarding the Inspectorates position on unscheduled/ emergency maintenance.
3.7.6	Section 8.8	Long term effects to people's views and visual amenity as a result of the existence and operation of the proposed development – Construction and decommissioning	The Inspectorate agrees that long term effects are not likely to occur during the construction and decommissioning phases of the proposed development. These matters can be scoped out of the ES.
3.7.7	Section 8.8	Temporary effects associated with lighting –	Whilst the Inspectorate agrees that temporary lighting effects are not likely to occur during operation and can be scoped out, it considers that there is the potential for temporary lighting effects during decommissioning which have not been addressed.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
		Operation and decommissioning	As such the Inspectorate is not in a position to agree to scope this matter out at this stage. The ES should contain an assessment of temporary lighting effects during decommissioning or provide further justification, including evidence of agreement with the relevant consultees, as to why significant effects would be unlikely to occur. See ID 2.2.4 regarding the Inspectorates position on unscheduled/ emergency maintenance.
3.7.8	Section 8.8	Long term effects associated with lighting – All phases	The Inspectorate agrees that long term lighting effects as a result of the pipeline are not likely to occur and can be scoped out of the ES. However, it considers that insufficient information has been provided on the proposed lighting scheme and the location of AGI to rule out significant effects in this regard. The ES should assess the potential for long term lighting impacts associated with the AGI, or provide further justification, including evidence of agreement with the relevant consultees, as to why significant effects would be unlikely to occur.

ID	Ref	Description	Inspectorate's comments
3.7.9	Paragraph F.3.1.3	Photomontages	The applicant should consider the use of photomontages from representative viewpoints to illustrate the likely extent and nature of changes in baseline views.
3.7.10	Section F5	Representative viewpoints	The Inspectorate notes that representative viewpoints will be identified following the scoping process in consultation with the Local Planning Authorities and relevant statutory consultees. The ES should include confirmation of the consultation undertaken, together with evidence of agreement about the final viewpoints selected. Where any disagreement remains, an explanation as to how the final selection was made should be provided. The ES should include a plan to illustrate the location of viewpoints in relation to the proposed development.

3.8 Major accidents and disasters

(Scoping Report Section 8.9)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.8.1	Section 8.9	Avalanches, earthquakes, tsunamis	The Scoping Report proposes to scope these matters out as the location of the proposed development means these events are highly unlikely. The Inspectorate agrees to scope this matter out of the ES.
3.8.2	Section 8.9	Volcanic eruption	The Scoping Report proposes to scope this matter out as the location of the proposed development means this event is highly unlikely. The Inspectorate agrees this matter can be scoped out of the ES.
3.8.3	Section 8.9	Landslides – Decommissioning	The Scoping Report states that there are recorded landslide events within the scoping boundary, however the applicant states that the project will not change the erosion potential of the soil or stability of the land. The Scoping Report proposes to scope this matter out of the assessment as decommissioning works are unlikely to contribute to an increased landslide risk. In the absence of detail regarding activities and works which are likely to be required during decommissioning, the Inspectorate is not in a position to agree to scope this matter from the assessment. Accordingly, the ES should include an assessment of this matter.
3.8.4	Section 8.9	Sinkholes – Operation and decommissioning	The Scoping Report proposes to scope this matter out as any works associated within the operational and decommissioning phases would not contribute to an increased sinkhole risk. In the absence of detail regarding the activities and works which are likely to be required during decommissioning the Inspectorate is not in a position to agree to scope this matter from the assessment. Accordingly, the ES should include an assessment of this matter.
3.8.5	Section 8.9	Flooding	The Scoping Report explains that although the proposed development is located within an area at risk from flooding, the vulnerability of the project to flooding as well

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			as any potential to exacerbate flooding off-site will be assessed within the flood risk assessment (FRA). The Scoping Report proposes to scope this matter out of the major accidents and disasters assessment in the ES to avoid duplicate assessments. Providing that this matter is adequately addressed in the FRA and appropriately cross-referenced in the ES, the Inspectorate is content with this approach and agrees to scope this matter out from this aspect chapter.
3.8.6	Section 8.9	Cyclones, hurricanes, typhoons, storms, gales and thunderstorms	The Scoping Report proposes to scope these matters out as the pipeline will be located below ground and unlikely to be affected by these weather events. Additionally, the AGI would be designed with consideration given to environmental factors, such as exposure to prevailing weather conditions and risk of lightning strikes, and in line with relevant standards and guidelines. The Scoping Report proposes to scope these matters out of the major accidents and disasters aspect chapter, but states that any residual risks will be reported within the climate change resilience aspect chapter of the ES. On this basis the Inspectorate agrees with the approach to scope these matters out of this aspect chapter.
3.8.7	Section 8.9	Extreme temperatures	The Scoping Report states that the proposed development will be designed to withstand reasonably low and high temperatures in line with relevant standards and guidelines. This matter is proposed to be scoped out of the major accidents and disasters aspect chapter and states that any relevant residual risks will be included within the climate change resilience aspect chapter of the ES. On this basis, the Inspectorate agrees with the approach to scope this matter out of this aspect chapter.
3.8.8	Section 8.9	Droughts	The Scoping Report proposes to scope this matter out as the proposed development is not considered to be vulnerable to drought or a potential contributor to drought. The Inspectorate agrees to scope this matter out of the ES.
3.8.9	Section 8.9	Wildfire	The Scoping Report explains that the scoping boundary does include some areas of woodland and vegetation, but that this matter is proposed to be scoped out on the basis that if extended periods of hot and dry weather occur, additional controls would

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			be considered to manage risks. The Scoping Report states that the ES will set out the additional controls which would be considered. In the absence of information, such as evidence demonstrating clear agreement with relevant consultation bodies, or defined avoidance and mitigation measures to be included within the OEMP, the Inspectorate is not in a position to agree to scope this matter from the assessment. Accordingly, the ES should include an assessment of these matters or the information referred to demonstrating agreement with the relevant consultation bodies and the absence of LSE.
3.8.10	Section 8.9	Fog	The Scoping Report proposes to scope this matter out of the ES on the basis that standard site safety measures will be used during the construction or decommissioning phase if fog were to present a hazard. The Inspectorate agrees to scope this matter out but considers that it should be made clear in the ES how these measures would be delivered and secured through cross reference to the CEMP, DEMP, and dDCO.
3.8.11	Section 8.9	Biological Hazards – disease epidemics and animal diseases; and plants	These matters are proposed to be scoped out as the nature of the proposed development means it is unlikely to result in the emergence or spread of a disease outbreak. Additionally, during construction an appointed contractor will ensure standard management measures are applied when handling and disposing of any diseased or invasive plant material, with the aim of preventing its spread. The Inspectorate agrees these matters can be scoped out of this aspect chapter. The Inspectorate directs the applicant to comments in ID 3.2.9 of this Opinion, regarding INNS and biodiversity.
3.8.12	Section 8.9	Societal hazards – political considerations; terrorism and crime; and displaced populations	The Scoping Report proposes to scope this matter out of the ES as the nature of the proposed development means such societal hazards are highly unlikely to occur. The Inspectorate agrees that these matters can be scoped out.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.8.13	Section 8.9	Chemical sites and pipelines – Decommissioning of the pipeline only	The scoping report proposes to scope this matter out of the ES as the pipeline proposed as part of the project will remain in-situ once decommissioned, and any significant effects are unlikely to occur. The Inspectorate agrees this matter can be scoped out but notes that this matter is scoped in for all other stages of the project, including decommissioning of the AGI.
3.8.14	Section 8.9	Nuclear sites	The Inspectorate agrees to scope this matter out of the ES on the basis that there are no nuclear facilities within the development site or study area.
3.8.15	Section 8.9	Dam/ reservoir/ flood defence failure	The Scoping Report proposes to scope this matter out on the basis that such events are considered very unlikely. The report states that the presence of any flood defences, reservoirs and dams will be addressed in the FRA, which will also assess any residual risk in relation to any breach. The Inspectorate is content with this approach.
3.8.16	Section 8.9	Mines and storage caverns – Operation and decommissioning	The Scoping Report proposes to scope this matter out as any associated risk from previous coal mining activity will relate to the construction phase only, and no residual risk is anticipated during the operational or decommissioning phases. The Inspectorate is content with this approach.
3.8.17	Section 8.9	Fire and/ or explosion including hydrogen release – Construction and decommissioning	The Scoping Report proposes to scope this matter out of the ES as there will be no hydrogen inventory present during construction or decommissioning of the proposed development, and any risk of fire during would be managed through the CEMP and DEMP. On this basis the Inspectorate agrees this matter can be scoped out but considers that it should be made clear in the ES how these measures would be delivered and secured through cross reference to the CEMP, DEMP, and dDCO.
3.8.18	Section 8.9	Transport accidents – Road and navigable waterways	The Scoping Report explains that although the proposed development would result in an increase in the number of HGV and plant equipment on the local road network, any potential increase in the risk of accidents will be assessed within the transport

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			and movement chapter of the ES. The report also explains that an assessment of waterway navigation will also be included in the transport and movement chapter of the ES. The Scoping Report proposes to scope these matters out of the major accidents and disasters aspect chapter in the ES to avoid duplicate assessments. The Inspectorate is content with this approach.
3.8.19	Section 8.9	Rail transport accidents – During construction of the AGI, and operation and decommissioning of all components	The Scoping Report explains that the study area crosses the Hull-Selby-York passenger rail line and other rail lines including the Hull-Beverley line. However, the applicant proposes to scope this matter out of the ES on the basis that ongoing design development and refinement of the land required for the proposed development will prevent direct effects. Appropriate mitigation measures and safe working practices will be included in the CEMP and implemented when working near railways during construction. The Inspectorate agrees to scope this matter out but considers that it should be made clear in the ES how these measures would be delivered and secured through cross reference to the CEMP, OEMP, DEMP, and dDCO.
3.8.20	Section 8.9	Aviation transport accidents – Operation and decommissioning	The Scoping Report proposes to scope this matter out as the proposed development will not interact with airfields during operation or decommissioning, and the height of the proposed stack would not require aviation warning lighting or notification. On this basis the Inspectorate agrees to scope this matter out of the ES.
3.8.21	Section 8.9	Air quality and human health – Construction and decommissioning	The Scoping Report proposes to scope this matter out as there will be no hydrogen inventory present during construction or decommissioning of the proposed development, as such there is no risk of a large-scale containment failure. On this basis the Inspectorate agrees to scope this matter out of the ES.
3.8.22	Section 8.9	Land and water pollution accidents	The Scoping Report proposes to scope this matter out of this aspect chapter on the basis that appropriate control and management procedures will be secured through the CEMP, OEMP, and DEMP. An assessment of land and water contamination will be included in the ground conditions and water resources chapters of the ES. The

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			Inspectorate is content with this approach and agrees to scope these matters out of the major accidents and disasters aspect chapter.
3.8.23	Section 8.9	Electrical infrastructure	The Scoping Report proposes to scope this matter out as appropriate controls are to be implemented in consultation with relevant network operators where works are required in proximity to electrical infrastructure, and safe working practices would routinely be applied to prevent construction utility strikes. The Inspectorate is content with this approach and agrees to scope this matter out but considers that it should be made clear in the ES how these measures would be delivered and secured through cross reference to the CEMP, OEMP, DEMP, and dDCO.
3.8.24	Section 8.9	Gas – Operation of all components, and decommissioning of the pipeline	The Scoping Report proposes to scope this matter out at operation as there is no potential for interaction with existing pipelines once the pipeline is built. During decommissioning the pipeline will remain in-situ and therefore significant effects are unlikely. The Inspectorate agrees to scope this matter out on this basis.
3.8.25	Section 8.9	Water supply infrastructure	The Scoping Report proposes to scope this matter out on the basis that operators will be consulted so that impacts to supply lines do not occur. The Inspectorate agrees to scope this matter out of the ES but considers that it should be made clear in the ES how any measures would be delivered and secured through cross reference to the CEMP, OEMP, DEMP, and dDCO.
3.8.26	Section 8.9	Sewage system	The Scoping Report proposes to scope this matter out as the proposed development will not require connection to or use of the sewage network. The Inspectorate agrees this matter can be scoped out of the ES.
3.8.27	Section 8.9	UXO – Operation of all aspects and decommissioning of the pipeline	The Scoping Report proposes to scope this matter out as maintenance activities associated with the proposed development would not pose a UXO risk, additionally the pipeline would remain in-situ once decommissioned. The Inspectorate agrees this matter can be scoped out of the ES.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.8.28	Section 8.9	Chemical / biological / radiological / nuclear transport systems, and crowded places	The Scoping Report proposes to scope this matter out as the proposed development is highly unlikely to be subject to this type of event. The Inspectorate agrees this matter can be scoped out of the ES.
3.8.29	Section 8.9	Technological or engineering accidents and failures – Cyber, bridge failure, mast and tower collapse, tunnel failure/ fire	The Inspectorate agrees to scope these matters out of the ES on the basis that such events are unlikely to occur.

3.9 Material assets and waste

(Scoping Report Section 8.10)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.9.1	Section 8.10	Changes in demand for materials – Operation and decommissioning	The Scoping Report proposes to scope this matter out of the assessment as during the operation and decommissioning stages of the project the nature and scale of materials required will be minor and any associated effects negligible. The Inspectorate agrees that this matter can be scoped out of the ES.
3.9.2	Section 8.10	Changes in available landfill capacity – Operation and decommissioning	The Scoping Report proposes to scope this matter out of the assessment as during operation the pipeline and AGI are expected to require only limited routine maintenance, therefore waste generation will be minimal. The Inspectorate agrees that this matter can be scoped out of the operation phase on this basis. At decommissioning the pipeline is proposed to be left in-situ and the only waste required for landfill will be that from the AGI decommissioning that cannot be recycled or reused. In the absence of details regarding activities and works which are likely to be required during decommissioning, the Inspectorate is not in a position to agree to scope this matter from the assessment. Accordingly, the ES should include an assessment of this matter.
3.9.3	Section 8.10	Changes to safeguarded allocated waste and mineral sites – Operation and decommissioning	The Scoping Report explains that the location of any safeguarded waste or mineral resources within the proposed development site will be identified and impacts during construction will be assessed where relevant. It is not expected that the proposed development would interact with any safeguarded allocated waste and mineral sites during operation or decommissioning. The Inspectorate is content with this approach and agrees that this matter can be scoped out of the ES.
3.9.4	Section 8.10	Waste generated through the extraction, processing and	The Scoping Report proposes to scope these matters out of the assessment as the materials and components required for construction will be produced in manufacturing establishments with their own waste management arrangements

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
		manufacture of construction materials and components – All phases	outside of the study area. The Inspectorate agrees to scope these matters out of the ES on this basis.
3.9.5	Section 8.10	Environmental effects arising at off-site waste management facilities – All phases	The Scoping Report proposes to scope this matter out of the assessment on the basis that ISEP guidance recognises that indirect effects associated with off-site material production and waste management facilities are normally addressed through the separate planning and permitting frameworks governing those facilities. The Inspectorate agrees that this matter can be scoped out of the ES.

3.10 Noise and vibration

(Scoping Report Section 8.11)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.10.1	Section 8.11	Pipeline impacts – Operation and decommissioning	The Scoping Report proposes to scope out all operational and decommissioning impacts from the pipeline component of the proposed development as it will be installed below ground and not produce any noise. The Inspectorate agrees that this matter can be scoped out of the ES.
3.10.2	Section 8.11	AGI noise impacts from Block Valve Stations (BVS) – Operation	The only element of AGI that has been proposed to be scoped out of the assessment is the BVS component on the basis that no noise generating plant will be installed and venting would be very infrequent. The Inspectorate agrees to scope this matter out on this basis.
3.10.3	Section 8.11	AGI vibration impacts – Operation	The Scoping Report proposes to scope out vibration impacts for the AGI component of the proposed development on the basis that vibration during operation is expected to be negligible. The Inspectorate agrees that vibration impacts during operation will be minimal as no rotating or reciprocating equipment is proposed and is content that this matter can be scoped out of the ES.
3.10.4	Section 8.11	AGI noise from road traffic – Operation	The Scoping Report proposes to scope out noise from road traffic for the AGI component of the proposed development on the basis that road traffic movements are expected to be minimal. The Inspectorate is content that minimal road traffic movements would occur during operation and that significant effects are unlikely. On this basis, this matter can be scoped out of further assessment. However, the ES should confirm the vehicle types and likely number and routing of vehicle movements required during operation (with reference to thresholds within guidance) to justify this position.

3.11 Socio-economics

(Scoping Report Section 8.12)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.11.1	Section 8.12	Employment and supply chain effects as a result of the pipeline – Decommissioning	The Scoping Report proposes to scope this matter out on the basis that the pipeline is to be left in-situ during decommissioning and therefore there would be no LSE in relation to employment and the supply chain. On this basis, the Inspectorate agrees that this matter can be scoped out of the ES.
3.11.2	Section 8.12	Public Right of Way (PRoW) impacts from the pipeline – Operation and decommissioning	This matter is proposed to be scoped out on the basis that the pipeline would be buried and left in-situ during the operation and decommissioning phase. On this basis, the Inspectorate agrees that significant effects on the PRoW network are not likely to occur during these phases and this matter can be scoped out of the ES. See ID 2.2.4 regarding the Inspectorates position on unscheduled/ emergency maintenance.
3.11.3	Section 8.12	PRoW impacts from the AGI – Operation	The Scoping Report proposes to scope this matter out on the basis that opportunities for enhancement of the PRoW would be reported during construction and would not be considered further as part of the operation phase. The Inspectorate considers that this rationale omits consideration of potential significant effects associated with the placement of AGI in proximity to PRoWs. Considering the final location of AGI has not yet been identified, the Inspectorate considers that there is insufficient information to rule out significant effects. The ES should provide further justification, such as the approximate location of AGI and/ or a statement confirming that PRoWs would be avoided, or provide an assessment of likely significant effects.
3.11.4	Section 8.12	Potential indirect effects on local businesses and	These matters are proposed to be scoped out on the basis that whilst construction and decommissioning would result in a temporary increase in construction workers, the geographic spread of the proposed development would mean that any effects would likely be negligible, and the operation phase is unlikely to result in any

		community facilities – All phases	significant effects. The Inspectorate agrees that significant indirect effects on local businesses and community facilities as a result of the proposed development are not likely to occur and that this matter can be scoped out of the ES.
3.11.5	Section 8.12	Development land allocations (including mineral resource) and open space – All phases	This matter is proposed to be scoped out of the ES on the basis that whilst development land allocations are located within the scoping boundary, effects would be temporary in nature and although parts of the proposed development are within a Mineral Safeguarding Area (MSA), the minerals would not be permanently sterilised by it. The Inspectorate considers that insufficient information has been provided on the final location of the proposed AGI in relation to any land allocations in order to rule out significant effects. The ES should provide further justification, such as the approximate location of AGI and/ or a secured commitment confirming that any land allocations would be avoided when siting AGI, or provide an assessment of likely significant effects.

3.12 Soils and agricultural land

(Scoping Report Section 8.13)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.12.1	Section 8.13	Pipeline impacts on agricultural land – Operation and decommissioning	The Scoping Report states that as the pipeline will be left in-situ upon operation, there will be no impacts during operation and decommissioning on agricultural land from the pipeline. The Inspectorate agrees with this approach and this matter can be scoped out of the ES.
3.12.2	Section 8.13	AGI impacts on agricultural land – Operation	The text within this table states that all phases of the AGI will be scoped in regarding agricultural land, however the adjoining table shows that this matter is to be scoped out. For the avoidance of doubt, the Inspectorate considers that this matter should be scoped into the ES.
3.12.3	Section 8.13	Pipeline impacts on agricultural holdings – Operation and decommissioning	The Scoping Report states that as the pipeline will be left in-situ upon operation, there will be no impacts during operation and decommissioning on agricultural holdings from the pipeline. The Inspectorate agrees with this approach and this matter can be scoped out of the ES. See ID 2.2.4 regarding the Inspectorates position on unscheduled/ emergency maintenance.
3.12.4	Section 8.13	AGI impacts on agricultural holdings – Operation and decommissioning	The Scoping Report proposes to scope out effects relating to the AGI at operation and decommissioning due to the AGI being a small part of the agricultural land holdings in the area. As there is limited information regarding the amount of land required for the AGI and a lack of information regarding the types of land holdings in the area, the Inspectorate is unable to agree to scope this matter out of the ES and therefore should be included in the assessment.

3.12.5	Section 8.13	Pipeline impacts on soil carbon – Operation and decommissioning	The Scoping Report states that as the pipeline will be left in-situ upon operation, there will be no impacts during operation and decommissioning on soil carbon from the pipeline. The Inspectorate agrees with this approach and this matter can be scoped out of the ES. See ID 2.2.4 regarding the Inspectorates position on unscheduled/ emergency maintenance.
3.12.6	Section 8.13	AGI impacts on soil carbon – Operation	It is proposed to scope out impacts from the AGI on soil carbon during operation as these impacts occur from soil disturbance. As there will be minimal disturbance to soils during the operational phase of the AGI, the Inspectorate is content to scope this matter out.
3.12.7	Section 8.13	Pipeline impacts on soil resource – Operation and decommissioning	The Scoping Report states that as the pipeline will be left in-situ upon operation, there will be no impacts during operation and decommissioning on soil resource from the pipeline. The Inspectorate agrees with this approach and this matter can be scoped out of the ES. See ID 2.2.4 regarding the Inspectorates position on unscheduled/ emergency maintenance.
3.12.8	Section 8.13	AGI impacts on soil resource – Operation	It is proposed to scope out impacts from the AGI on soil resource during operation as these impacts occur from soil disturbance. As there will be minimal disturbance to soils during the operational phase, the Inspectorate is content to scope this matter out.
3.12.9	Section 8.13	Soil health – All phases	The Scoping Report proposes to scope out this matter for all components and phases, however there is limited justification provided to provide assurance that soil health will not be significantly impacted by the proposed development. The Inspectorate cannot agree to scope this matter out at this stage and should therefore be included for assessment in the ES.

ID	Ref	Description	Inspectorate's comments
3.12.10	Section 8.13	Agricultural land	The ES should contain a clear tabulation of the areas of land in each Best Most Versatile (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 is possible. Consideration should be given to the use of BMV land in the applicant's discussion of alternatives.

3.13 Transport and movement

(Scoping Report Section 8.14)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.13.1	Section 8.14	Pipeline impacts – Operation and decommissioning	The Scoping Report proposes to scope out all impacts from the operational and decommissioning phases in relation to the pipeline as once it is operational it will remain in-situ, with limited operational activity. On this basis, the Inspectorate is content that this matter can be scoped out of the ES. However, the ES should confirm the vehicle types and likely number and routing of vehicle movements required during operation (with reference to thresholds within guidance) to justify this position. See ID 2.2.4 regarding the Inspectorates position on unscheduled/ emergency maintenance.
3.13.2	Section 8.14	AGI impacts – Operation	The applicant proposes to scope out all operational matters in relation to AGI on the basis that activity would be infrequent and would not have a material effect on the transport network and receptors. Subject to confirmation within the ES that anticipated operational vehicle movements do not exceed relevant guidance thresholds for increases in traffic levels, the Inspectorate agrees that significant effects are unlikely and that an assessment of effects can be scoped out of the ES. If such confirmation is not possible, an assessment should be provided. The ES should also demonstrate that cumulative vehicle movements with other developments would not exceed relevant thresholds.
3.13.3	Section 8.14	Road safety audits – All phases	The Scoping Report states that any new or amended access points required to serve the proposed development to/ from the public highway would be subject to a Road Safety Audit at the appropriate stage and would be considered as part of the Transport

			Assessment. On this basis, the Inspectorate is content this matter can be scoped out of the ES.
3.13.4	Section 8.14	Hazardous/ large loads for AGI – Decommissioning	The Scoping Report states that this matter is proposed to be scoped out, however it is marked as being scoped in the assessment. For the avoidance of doubt the Inspectorate does not agree to scope this matter out of the assessment as further details regarding the decommissioning phase are not available and it is likely that hazardous/ large loads may be required for the decommissioning of AGI.

3.14 Water resources and flood risk

(Scoping Report Section 8.15)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.14.1	Section 8.15	Pipeline impacts – Decommissioning	The Scoping Report proposes to scope out all impacts from the pipeline component during decommissioning, save for any flood risk related impacts, which are scoped in. As the pipeline is to be left in-situ for the decommissioning phase, the Inspectorate agrees that this matter can be scoped out from assessment within the ES.

ID	Ref	Description	Inspectorate's comments
3.14.2	Section 8.15	Risks to flood defences	There is no mention of impacts to flood defences in the scoping report, despite the potential for damage or degradation of flood defences to occur during construction of the proposed development. The applicant should assess the potential impacts to flood defences from the proposed development within the ES and further information regarding the proximity of works to defences should be included within the FRA. The applicant's attention is drawn to the response from the EA in Appendix 2 of this Opinion.

3.15 Human health

(Scoping Report Section 9.1)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.15.1	Section 9.1	Environmental impacts	Environmental impacts are proposed to be scoped out of the human health aspect chapter on the basis that they will be assessed in the relevant topic assessment chapters. On this basis, the Inspectorate agrees that environmental impacts can be scoped out of the human health aspect chapter.
3.15.2	Section 9.1	Traffic; access and connectivity	Impacts from traffic; access and connectivity are proposed to be scoped out on the basis that the proximity of the proposed development to the Strategic Road Network (SRN) and A-road network would reduce the risk of impacts on human health, and design and control measures outlined in the transport aspect chapter of the ES would mitigate disruption and annoyance. On this basis, the Inspectorate agrees that significant human health effects resulting from traffic impacts are not likely to occur. This matter can be scoped out of the ES but considers that it should be made clear in the ES how any measures would be delivered and secured through cross reference to the CEMP, OEMP, DEMP, and dDCO.
3.15.3	Section 9.1	Green space and physical activity	The Scoping Report proposes to scope this matter out on the basis that minor reductions in areas of publicly accessible green space during construction and operation would not be considered material in the context of overall access to green space and opportunities for physical activity at the population level. On this basis, the Inspectorate agrees that this matter can be scoped out of the ES.
3.15.4	Section 9.1	Economic and employment impacts	This matter is proposed to be scoped out on the basis that the jobs created as a result of the proposed development would not be likely to affect the overall health and wellbeing of communities in the study area and economic effects will be considered

			within the socio-economics chapter. On this basis, the Inspectorate agrees that this matter can be scoped out of the ES.

ID	Ref	Description	Inspectorate's comments
3.15.5	Section 9.1	Chapter inclusion in the ES	The Inspectorate is content that a standalone assessment on human health is not required. The ES should, however, clearly signpost where impacts relating to all relevant aspects of physical and mental health have been considered in the relevant technical aspect chapters. The following information must be made clear within each technical aspect chapter: a summary of any key findings, risk assessments (where appropriate), proposed mitigation measures, conclusions and residual effects relating to human health. It must also be clear how the proposed development complies with the requirements of National Policy Statements and relevant guidance and standards relating to human health.

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 relevant parish council or, where the application relates to land in Wales or Scotland, the relevant community council	Ackworth Parish Council
	Airmyn Parish Council
	Alkborough and Walcot Parish Council
	Allerton Bywater Parish Council
	Anlaby with Anlaby Common Parish Council
	Asselby Parish Council
	Balne Parish Council
	Barlow Parish Council
	Barmby on the Marsh Parish Council
	Beal Parish Council
	Beverley Town Council
	Bilton Parish Council
	Blacktoft Parish Council
	Brantingham Parish Council
	Broomfleet Parish Council
	Brotherton Parish Council
	Bubwith Parish Council
	Burn Parish Council

SCHEDULE 1 DESCRIPTION	ORGANISATION
	Burstwick Parish Council
	Burton Salmon Parish Council
	Byram cum Sutton Parish Council
	Camblesforth Parish Council
	Carlton Parish Council
	Chapel Haddlesey Parish Council
	Cliffe Parish Council
	Coniston and Thirtleby Parish Council
	Cottingham Parish Council
	Cridling Stubbs Parish Council
	Darrington Parish Council
	Drax Parish Council
	East Hardwick Parish Council
	Eastrington Parish Council
	Eggborough Parish Council
	Ellerby Parish Council
	Ellerker Parish Council
	Elloughton-cum-Brough Town Council
	Fairburn Parish Council
	Featherstone Town Council
	Gateforth Parish Council
	Gilberdyke Parish Council
	Goole Town Council
	Goole Fields Parish Council

SCHEDULE 1 DESCRIPTION	ORGANISATION
	Gowdall Parish Council
	Heck Parish Council
	Hedon Town Council
	Hemingbrough Parish Council
	Hensall Parish Council
	Hessle Town Council
	Hillam Parish Council
	Hirst Courtney & West Bank Parish Council
	Holme upon Spalding Moor Parish Council
	Hook Parish Council
	Hotham Parish Council
	Howden Town Council
	Kellington Parish Council
	Kilpin Parish Council
	Kirk Ella & West Ella Parish Council
	Laxton Parish Council
	Ledsham Parish Council
	Long Drax Parish Council
	Newbald Parish Council
	Newland Parish Council
	Newport Parish Council
	Normanton and Altofts Town Council
	North Cave Parish Council
	North Ferriby Parish Council

SCHEDULE 1 DESCRIPTION	ORGANISATION
	Paull Parish Council
	Pollington Parish Council
	Preston Parish Council
	Rawcliffe Parish Council
	Riston Parish Council
	Rowley Parish Council
	Skidby Parish Council
	Skirlaugh Parish Council
	Snaith and Cowick Town Council
	South Cave Parish Council
	South Ferriby Parish Council
	Spaldington Parish Council
	Sproatley Parish Council
	Swanland Parish Council
	Swine Parish Council
	Swinefleet Parish Council
	Sykehouse Parish Council
	Temple Hirst Parish Council
	Tickton and Routh Parish Council
	Twin Rivers Parish Council
	Walkington Parish Council
	Wawne Parish Council
	Welton Parish Council
	Whitley Parish Council

SCHEDULE 1 DESCRIPTION	ORGANISATION
	Willerby Parish Council
	Winteringham Parish Council
	Woodmansey Parish Council
	Wressle Parish Council
The Environment Agency	The Environment Agency
Natural England	Natural England
The Forestry Commission	Yorkshire & North East Forestry Commission
The Historic Buildings and Monuments Commission for England (known as Historic England)	Historic England
The relevant internal drainage board	Beverley and North Holderness Internal Drainage Board
	Danvm Drainage Commissioners
	Ouse and Humber Drainage Board
	Rawcliffe Internal Drainage Board
	Selby Area Internal Drainage Board
	South Holderness Internal Drainage Board
	Black Drain Drainage Board
	Cowick and Snaith Internal Drainage Board
	Dempster Internal Drainage Board
	Thorntree Internal Drainage Board
The Canal and River Trust	The Canal and River Trust
The relevant Highways Authority	East Riding of Yorkshire Council Highways Department
	Hull City Council Highways Department
	North Yorkshire Council Highways Department

SCHEDULE 1 DESCRIPTION	ORGANISATION
	Wakefield Metropolitan District Council Highways Department
	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

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 Coal Authority	Mining Remediation Authority
The Crown Estate Commissioners	The Crown Estate
The relevant police authority	West Yorkshire Combined Authority
	Police and Crime Commissioner for Humberside
	York & North Yorkshire Combined Authority
The relevant ambulance service	Yorkshire Ambulance Service NHS Trust
The relevant fire and rescue authority	Humberside Fire
	North Yorkshire Fire and Rescue
	West Yorkshire Fire and Rescue

STATUTORY UNDERTAKER	ORGANISATION
The relevant Integrated Care Board	NHS Humber and North Yorkshire Integrated Care Board
	NHS West Yorkshire Integrated Care Board
	NHS South Yorkshire Integrated Care Board
NHS England	NHS England
The relevant NHS Trust	Hull University Teaching Hospitals NHS Trust
	Mid Yorkshire Hospitals NHS Trust
	Yorkshire Ambulance Service NHS Trust
The relevant NHS Foundation Trust	Humber Teaching NHS Foundation Trust
	Harrogate and District NHS Foundation Trust
Railways	Network Rail Infrastructure Ltd
	National Highways Historical Railways Estate
	Network Rail
Road Transport	The Humber Bridge Board
Canal Or Inland Navigation Authorities	The Canal and River Trust
Dock and Harbour authority	Associated British Ports
Universal Service Provider	Royal Mail Group
The relevant Environment Agency	The Environment Agency
The relevant water and sewage undertaker	Yorkshire Water
The relevant public gas transporter	Cadent Gas Limited
	Northern Gas Networks Limited
	Scotland Gas Networks Plc
	Southern Gas Networks Plc

STATUTORY UNDERTAKER	ORGANISATION
	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
	Inovyn Enterprises Ltd
	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	Doggerbank Offshore Windfarm Project 4 Projco Limited
	Drax Power Limited
	East Yorkshire Solar Farm Limited
	Eggborough Power Limited
	Fenwick Solar Project Limited
	C.Gen Killingholme Limited
	Knottingley Power Limited
	Light Valley Solar Limited
	Saltend Cogeneration Company Limited

STATUTORY UNDERTAKER	ORGANISATION
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
	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

STATUTORY UNDERTAKER	ORGANISATION
	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)

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

LOCAL AUTHORITY
East Riding of Yorkshire Council
Hull City Council
North Yorkshire Council
Wakefield Metropolitan District Council
Barnsley Metropolitan Borough Council
Bradford Metropolitan District Council
Durham County Council
Darlington Borough Council
City of Doncaster Council
Kirklees Metropolitan Council
Lancashire County Council
Lancaster City Council
Leeds City Council
Middlesbrough Borough Council
North Lincolnshire Council
North York Moors National Park

LOCAL AUTHORITY
Pendle Borough Council
Redcar and Cleveland Borough Council
Ribble Valley Borough Council
Stockton-on-Tees Borough Council
Westmorland & Furness Council
City of York Council
Yorkshire Dales National Park

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

APPENDIX 2: RESPONDENTS TO CONSULTATION AND COPIES OF REPLIES

CONSULTATION BODIES WHO REPLIED BY THE STATUTORY DEADLINE:
Beverley and North Holderness Internal Drainage Board
Canal and River Trust
City of Bradford Council
Darlington Borough Council
Durham County Council
East Riding of Yorkshire Council
Environment Agency
Forestry Commission
Fulcrum Pipelines Limited
Health and Safety Executive
Historic England
Kirklees Council
Leeds City Council
Middlesborough Council
Mining Remediation Authority
National Gas Transmission
National Grid Electricity Transmission
National Highways
Natural England
North Lincolnshire Council
North Yorkshire Fire and Rescue Service
Northern Gas Networks

Ouse and Humber Drainage Board
Redcar and Cleveland Borough Council
Royal Mail
South Holderness Internal Drainage Board
Sphere Energy Connect
UK Health Security Agency
Yorkshire Consortium Drainage Board
Yorkshire Dales National Park Authority

BEVERLEY AND NORTH HOLDERNESS INTERNAL DRAINAGE BOARD

(A Member of the York Consortium of Drainage Boards)

==========

9th June 2026

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

Response by e-mail only to: eastcoasthydrogenhumber@planninginspectorate.gov.uk.

Dear Sir/Madam,

Please find below the Beverley and North Holderness Internal Drainage Board response to the scoping consultation by the Planning Inspectorate with regards to Project Ref. EN0710008 – East Coast Hydrogen Humber Pipeline.

Generally

A section of the proposed East Coast Hydrogen Humber Pipeline lies within the Beverley and North Holderness Internal Drainage Board district. Our district sits between the Cities of Hull, Beverley, and Driffield, with the eastern edge level with the village of Catwick.

Under the Land Drainage Act 1991 and the Board's Byelaws, the Board's prior written consent (outside of the planning process) is needed for -:

a. any connection into a Board maintained watercourse, or any ordinary watercourse in the Board's district.

b. any discharge, or change in the rate of discharge, into a Board maintained watercourse, or any ordinary watercourse in the Board's district. ***This applies whether the discharge enters the watercourse either directly or indirectly (i.e. via a third party asset such as a mains sewer).***

c. works within or over a Board maintained watercourse, or any ordinary watercourse in the Board's district – for example, land drainage, an outfall structure, bridges, culverting etc.

d. any construction, building, hardstanding, fencing or planting within 9 metres of the top of the embankment of a Board maintained watercourse.

Please note that the Board does not, generally, own any watercourses and the requirement for you to obtain the Board's consent is in addition to you obtaining consent from any landowner or other authority to carry out the relevant works.

Using 'Figure 1.2 – The Scoping Boundary Page 2 of 6 Rev. P01 Project No. 31295300', the Board believes that several Board maintained watercourses, and ordinary watercourses, will be affected by the proposed works.

William Symons Clerk to the Board
Derwent House, Crockey Hill, York, YO19 4SR ☎ Tel 01904 720785 www.yorkconsort.gov.uk

Works Very Close to Board Maintained and Ordinary Watercourses

The Board notes the following from the Environmental and Social Design Aims as set out in Section 4.3.4 in the East Coast Hydrogen Humber Pipeline Environmental Impact Assessment (EIA) Scoping Report (Volume I - Main Text):

> *'a minimum 10m offset will be maintained from the bank top of all watercourses from all infrastructure (including fencing) and construction works (other than where these watercourses are to be crossed)'*
>
> *'suitable stand offs/ avoidance measures (to be determined dependent on construction activities, local conditions and potential presence of ecological features) will be maintained from waterbodies, springs, spring catchments or boreholes to minimise risk of pollution'*

The Board's prior written consent is required for any new buildings, structures, fences, walls, planting, or hardstanding within 9 metres of the top of the embankment of any Board maintained watercourse.

The Board would generally seek for there to be nothing within 9 metres of the top of the embankment of the Board maintained watercourses so that the Board's machinery can go alongside the watercourse and conduct maintenance works to the watercourse. In addition, we want to ensure that there is nothing to destabilise the embankments of the watercourses and protect against potential future subsidence.

For any ordinary watercourses (i.e. ones which the Board do not maintain), the Board would generally request a minimum of 3 metres from the bank top to be left completely clear of any new buildings, structures, solar panels, fences, walls, planting, or hardstanding. This is to ensure there is sufficient room for maintenance works to the watercourse by the riparian owner in the future.

The Board would wish to remind the applicant that any installation should not interfere with or impede the ability of the Board or riparian owners to maintain watercourses within the Board's district.

For both Board maintained and ordinary watercourses the Board would request that for any section of pipeline/cable installation that runs parallel to the watercourse, the applicant leaves an easement of at least 9 metres between the bank top and the installation. This will ensure that access to the watercourse can be maintained, as well as protect against events of potential future subsidence, or any future channel widening that may be required.

Access Tracks

The Board notes the following from the Environmental and Social Design Aims as set out in Section 4.3.4 of the East Coast Hydrogen Humber Pipeline Environmental Impact Assessment (EIA) Scoping Report (Volume I - Main Text):

> '*As far as reasonably practicable, construction access tracks will be permeable to allow water to filtrate through and maintain greenfield runoff rates'*

This approach is welcomed by the Board.

For the avoidance of doubt, if the applicant is proposing to use a hardened stone, at least 20mm in size, and with no dust element, then the Board will not require a drainage strategy. Should the applicant propose to use a smaller size stone then the Board will require a drainage strategy.

Underground Cables/Pipeline

The Board notes the following regarding Open Trench Installation and Working Width as set out in the East Coast Hydrogen Humber Pipeline Environmental Impact Assessment (EIA) Scoping Report (Volume I – Main Text):

> *'4.5.11 Construction of the pipeline would predominantly be undertaken using open-cut trenching methods. During the construction phase, the contractor would define a temporary working width, representing the area within which pipeline installation activities can be safely undertaken'*

> *'4.5.17 Where permitted, minor watercourses and drainage ditches would be temporarily crossed using flumed arrangements and ramped access (or similar) to maintain a continuous construction route while allowing uninterrupted water flow. Any land drainage affected during construction would be appropriately managed through the installation of pre-construction drainage to ensure continued operation of local drainage systems.'*

The Board also notes the following regarding Trenchless Pipeline Installation set out in the East Coast Hydrogen Humber Pipeline Environmental Impact Assessment (Eia) Scoping Report (Volume I – Main Text):

> *'4.5.18 In certain locations along the proposed pipeline route, trenchless construction methods would be employed where open-cut trenching is either impracticable or not appropriate due to physical or environmental constraints. Such locations typically include crossings of strategic transport infrastructure, such as motorways and major highways, rail infrastructure, environmentally sensitive receptors (including designated and irreplaceable habitats), and major watercourses such as main rivers and canals.'*

If the applicant is proposing to insert a cable or pipeline under a watercourse within the Board's district, the Board's prior written consent must be obtained.

The Board requires that any cable or pipeline installation is at least 1.5 metres below true bed level of any watercourse (both ordinary and Board maintained) within the Board's district. The Board employs the use of heavy tracked machinery to undertake weed cutting and de-silting activities within the channel of watercourses, and we want to ensure the safety and security of the installation.

The Board will **not** accept open-cut crossing techniques for Board maintained watercourses.

The Board will only be prepared to consider open-cut crossings of ordinary watercourses within the Board's district once the applicant has provided sufficient evidence that trenchless crossing techniques are not feasible. Again, this must be installed no shallower than 1.5 metres below true bed level.

Bridge/Culvert Crossings Over Watercourses

The Board notes the following from Section 8.15 Water Resources and Flood Risk Scope and Methodology of East Coast Hydrogen Humber Pipeline Environmental Impact Assessment (EIA) Scoping Report (Volume I – Main Text):

> *'Watercourse crossings will be minimised where possible within the design of the Proposed Development via routeing and micro-siting. The design of major crossings will be informed by desk study and where required, GI.*
>
> *Any infrastructure within or alongside watercourses will be designed to reduce the potential for significant detrimental impact on flow conveyance and localised or catchment-wide impacts on flood risk; this will include any watercourse diversions, or any culverting advised as a result of the permanent works.*
>
> *Any permanent watercourse diversions or crossings will be designed to assist in continuity of conveyance and floodplain utilisation such that there is no residual significant detrimental impact on the wider catchment.'*

The Board welcomes the approach taken by the applicant.

The Board will want to see further details of any bridge/culvert crossings over any watercourses within our district. The Board will be recommending that a standard design is prepared and agreed in advance with the Board. These details will need to be discussed and agreed with the Board in due course.

Drainage Strategy for Above Ground Infrastructure

The Board notes the following from section 8.15 Water Resources and Flood Risk Scope and Methodology of East Coast Hydrogen Humber Pipeline Environmental Impact Assessment (EIA) Scoping Report (Volume I – Main Text):

> *'An Outline Drainage Strategy will be prepared, and appended to the FRA, to demonstrate the appropriate management of surface water runoff from the Proposed Development at AGI locations. The strategy will outline how surface water will be managed during the operational phase, including consideration of SuDS where relevant.'*

Where an impermeable area is over 50m^2, then the Board's policy is that this requires a formal drainage strategy. This relates to both permanent Above Ground Infrastructure or temporary infrastructure such as construction compounds.

In that instance, the Board would request:

1. **Soakaways**
   The Board always recommends that soakaways are *first* considered in accordance with the Planning Practice Guidance hierarchy for the management of surface water. The Board would therefore recommend:-

   a. **Percolation Testing**
      That the applicant be asked to carry out soakaway testing, in accordance with BRE Digest 365, in order to ascertain whether the soil structure is suitable for a soakaway system.

b. **Soakaway Design**
Should the testing prove to be successful the applicant should then submit a design for the soakaway, for approval by the Lead Local Flood Authority ("LLFA") as the "approving authority" for soakaways, which should:-

i. Storage volume should accommodate a 1:30 year event with no surface flooding (plus 30% allowance for climate change); and

ii. Storage volume should accommodate no overland discharge off the site in a 1:100 year event (plus 30% allowance for climate change).

c. **Existing Soakaway System**
Even if a soakaway already exists, the Board would suggest that the applicant provides confirmation of its location and that the system is working effectively, and also have evidence that it is capable of handling the volume of water that will be generated by the development. It is not, usually, sufficient for the applicant to rely on anecdotal evidence of its past performance.

2. **Discharge into a Watercourse**
The Board will only accept a discharge into a watercourse (directly or indirectly) where soakaways are not feasible. The below requirements apply when:

- There is a direct discharge to a watercourse.

- There is an indirect discharge to a watercourse – for example, through a private drainage system, or a mains sewer, which eventually discharges into a watercourse.

a. **Details of the Watercourse / Sewer**
The Board would request details of:

i. What the applicant is proposing to discharge into – for example, a watercourse.

ii. The location of the proposed point of connection.

b. **Flow of the Watercourse**
If the applicant is proposing to discharge directly (or through private drainage) into a watercourse, and if that watercourse is <u>not</u> maintained by the Board, we would ask:

i. Where this watercourse is flowing to. A simple plan showing the route of the watercourse to the nearest Board maintained watercourse is usually sufficient.

ii. Details of the condition of the watercourse to ensure the same is flowing freely prior to any discharge. The applicant is responsible for ensuring that the watercourse is free flowing but we would ask that they walk along the watercourse and ensure there are no blockages. Photographs should be provided as evidence.

c. **Discharge Rate**
The amount of water should be restricted to an agreed rate, using the below requirements:

i. The applicant should first demonstrate that there is an existing operational connection to the watercourse for the development site. This should be done by way of Dye Testing or a CCTV Survey.

Where that connection is established, the Board would want to know the size of those existing connected impermeable areas.

The existing drainage rate should then be calculated as 140 litres per second per hectare for the connected impermeable area, or the established rate (whichever is the lesser) - less 30%.

ii. Where there is a new connection to a watercourse or to a sewer that discharges to a watercourse, the maximum discharge that will be accepted is at the "greenfield" rate of 1.4 litres per second per hectare.

iii. If the site has been lying vacant and/or demolished before the existing surface water discharge regime is determined, then the maximum discharge that will be accepted from an area that is shown to discharge to the watercourse is greenfield run-off rates.

iv. The Board applies a minimum discharge rate of 0.5 litres per second. In accordance with the *National Standards For Sustainable Drainage Systems* robust measures must be put in place by the applicant to protect any orifice less than 50mm in diameter.

d. **Flow Control Device**
Whilst the Board is not the "approving authority" for flow control devices, we would request simple details as to what is proposed with regards to how the flow will be restricted to the agreed discharge rate.

e. **Surface Water Storage System**
Again, the Board is not the "approving authority" for surface water storage systems. However, we would request details of:

i. The proposed surface water storage system (which we would usually recommend is impermeably lined); and

ii. The proposed storage volume and accompanying calculations.

The system should accommodate a 1:30 year event with no surface flooding (plus 30% allowance for climate change); and no overland discharge off the site in a 1:100 year event (plus 30% allowance for climate change).

We would however recommend that a system should try and accommodate the full 1:100 year storm event (plus 30% allowance for climate change) wherever possible.

f. **Outfall Structure**
If there is a direct discharge to a watercourse and if that watercourse is within our district, the applicant should also provide details of the proposed outfall structure into the watercourse.

Yours faithfully,

[redacted]

Danielle Wright, LLM
Planning Officer

Email: Beverley@yorkconsort.gov.uk

Canal & River Trust
Making life better by water

Your Ref EN0710008

Our Ref CRTR-IPP-01005-01

Friday 12 June 2026

Proposal: Initial Scoping Consultation

Project Name: East Coast Hydrogen Humber Pipeline

Waterway: Aire & Calder Navigation; River Aire and River Ouse

Thank you for your consultation in respect of the above project.

The Trust is the charity who look after and bring to life 2000 miles of canals & rivers. Our waterways contribute to the health and wellbeing of local communities and economies, creating attractive and connected places to live, work, volunteer and spend leisure time. These historic, natural and cultural assets form part of the strategic and local green-blue infrastructure network, linking urban and rural communities as well as habitats. By caring for our waterways and promoting their use we believe we can improve the wellbeing of our nation. The Trust is a prescribed consultee in the Nationally Significant Infrastructure Projects (NSIP) process.

The Trust own, manage and operate the Aire & Calder Navigation, which interacts with the proposed development Wast of Knottingley. We are also Navigation Authority for the River Aire and River Ouse where the project seeks to cross these waterways.

To enable the Trust to carry out its statutory obligations, we wish to ensure that the project does not result in damage or harm to the structure of the canal or associated structures (including Kew Bridge), nor result to any obstruction or harm to the ability of our waterways to handle navigable traffic.

Having reviewed the Scoping document, we wish to raise the following comments on the project and proposed approach to the Environmental Report.

Biodiversity and Ecology

Chapter 8.3 of the scoping report considers the impact of the proposal upon biodiversity. We wish to highlight that our network can support important species, which can include breeding and wintering birds, badger, otter, water vole, reptiles, invertebrates, aquatic fauna and mammals (such as highlighted on page 73 of the scoping report).

The construction phase of the development is likely to have the greatest potential impact on our network. We note that impacts during the construction phase are listed on page 74, and pages 76-77. We have no significant issue with the proposed approach to the assessment, which includes the provision of a Preliminary Ecological Assessment and assessment of the impact to the species listed. We do wish to highlight, however, that in addition to the impacts identified on pages 73-74 additional impacts from the development that could impact wildlife associated with our waterspaces should also be considered.

Canal & River Trust Spatial Planning Team
E: planning@canalrivertrust.org.uk **W:** canalrivertrust.org.uk **T:** 0303 040 4040

Directional drilling below waterways during the construction phase could cause sediment discharges and problems arising from mud toxicity due to vibration below the watercourse. We believe the impact should be included within any future Environmental Report and scoped in, with consideration given to the provision of field studies into invertebrates and fish species found in the water to assess the sensitivity of these species to potential sediment movement.

There is potential for artificial lighting to be utilised on site during the construction phase, especially during the construction phases. **We request that the impact of this on waterbodies and species that utilise waterway habitats (including bats) should be considered in the Environmental Report**, in addition to the assessment on hedgerows described on page 73.

Cultural Heritage

Taking account of the location of designated heritage assets owned or managed by the Trust, we do not wish to raise specific comment about the methodology proposed for the assessment of the significance of heritage assets and impact of the scheme on these assets, as described in chapter 8.5.

Chapter 8.5 identifies that a formal HER search has not yet been carried out. It would be useful if it could be identified at an early stage over how it is intended to gather this information as part of the Environmental Assessment beyond the description of the study area on page 91. **We request that any Environmental Assessment should be supported by information informed by an appropriate expert to ensure that any relevant waterway-associated non-designated heritage assets are fully identified and the impact of the proposals upon them fully assessed.**

Ground Conditions

We wish to highlight that there is evidence of there being significant hydrocarbon contamination of land in and around former industrial sites towards the west of the proposed order limits. This is associated with the former Croda plant located off Stocking Lane. This is evidenced through the planning application made to Wakefield Borough Council on land to the north of the canal designed to remediate contamination caused by the plant (reference 17/00694/FUL). The order boundary includes land in proximity to the former Croda site, which could be contaminated. Due to the proposed pipeline being underground, any excavation works would need to be carefully installed to limit the potential spread of this contamination should it be present.

Pages 113 – 114 list potential sources of contamination. The above potential source is not listed, **and we consider that this should be listed so that any associated assessment takes this into account to ensure that appropriate mitigation measures are applied as appropriate (if required).**

We note that water and groundwater contamination risks are to be scoped into the assessment. Any works around this site that require the excavation of soils should be done so under strict rules for storage and removal, ensuring that hydrocarbon pollution is not a risk to the canal and river. There is also possibility of groundwater contamination and associated risks to any feeders into the canal and river from tributary waters which could affect river and canal water quality.

The works described indicate that Horizontal Directional Drilling (HDD) for a diameter of over 1m is proposed in some areas. **This is a large diameter, and could have a potential impact on ground stability. We request that informed expert advice should be used to demonstrate that ground conditions will be able to accept drilling of this diameter.** This is pertinent for works below rivers and canal, where any land collapse could result in significant localised flooding and harm to navigation. Should it not be demonstrated that HDD is safe, then alternative means of Auger boring may be more appropriate.

Canal & River Trust Spatial Planning Team
E: planning@canalrivertrust.org.uk **W:** canalrivertrust.org.uk **T:** 0303 040 4040

Landscape and Visual Amenity

We request that all waterway users, such as boaters, walkers, cyclists, and anglers, should be considered visual receptors for the purpose of the assessment, and should be included into the list of users identified on page 125 within chapter 8.8.

Visual receptors are defined as individuals or groups who may be affected by changes in views and visual amenity resulting from a development proposal. The key paragraphs, chapters and sections relating to this in the Guidelines for Landscape and Visual Impact Assessment GLVIA (3rd edition) can be found in the Glossary definition of a visual receptor (p.158) and Chapter 6, sections 6.13 (p.106), 6.33(p.113). On p127 onwards, the GLVIA states that canals, navigations or rivers under our authority should be considered as landscape receptors which are defined as aspects of the landscape resource that have the potential to be affected by a proposal.
All of the components listed on p127 of chapter 8.8 do have the potential to cause visual impact to canals and rivers and should be considered in this regard within reporting unless reasonably scoped out. We have no significant issue with the study areas proposed.

We consider that any LVIA should assess for long term impacts of the modifications to the AGI and M-1 as seen from the River Ouse, in addition to the impact of temporary works associated with the construction of the pipeline as seen from other parts of the waterway network.

Water Resources

Page 206 of the scoping report highlights surface water bodies (including our network) as a sensitive receptor. We note page 207 includes an assessment of potential impacts. As highlighted in our comments above in relation to Biodiversity and Ground Conditions, we consider that impacts of HDD activities on sedimentation and the risk of contamination from the former Croda works should be included within an assessment of impacts to water quality during the construction phase.

We note that several mitigation measures will be employed through the use of Construction Management Details. We consider this to be generally appropriate for some general risks (including risks from dust, runoff from stockpiles and exposed soils etc). We would be happy to review any Framework Plan as it is developed.

Comment of the proposed use of Horizontal Directional Drilling

As discussed above, we consider that there is a risk that HDD of over 1m in diameter could destablilise land above, and we request the appropriate supporting information is provided to demonstrate that this can be achieved safely where crossings of out network are proposed.

The Trust own and manage a Culvert below the canal and Skew Bridge which lie within the order boundary at Knottingley. These should be avoided where any new crossing is proposed, in order to avoid damage to these structures.

Existing deep sheet piles exist on the Aire & Calder Navigation, which may potentially be installed to a lower level than the proposed path of HDD works. We advise that the applicant should undertake prior investigatory works to ensure that the HDD works proposed will be of a suitable depth to avoid any collision with existing piles.

We are aware of an existing 48 inch gas pipeline close to the crossing point on the river Ouse close to Drax station, which may need to be taken into account by the applicant.

Other Comments

<u>The Trust as Landowner</u>

Canal & River Trust Spatial Planning Team
E: planning@canalrivertrust.org.uk **W:** canalrivertrust.org.uk **T:** 0303 040 4040

The Trust has a duty under the Trusts Agreement with the Secretary of State for Environment, Food and Rural Affairs (28 June 2012) to operate and manage the waterways and towpaths for public use and enjoyment. Additionally, the Trust has a duty under S105 Transport Act 1968 to maintain commercial and cruising waterways in a suitable condition for use by the public.

The Trust is a statutory undertaker which has specific duties to protect the waterways. Accordingly, we have a duty to resist the use of compulsory purchase powers which may negatively affect our land or undertakings. Alternatively, should any compulsory acquisition powers over the Trust's land be sought, such acquisition should only be with the consent of the Trust.

Separate discussions would need to take place between the Trust and the promotors, especially on the canal undergrounding detailing, design, engineering and agreements to access/enter our land as necessary.

Finally, the Trust will require any works to comply with the Canal & River Trust "Code of Practice for Works affecting the Canal & River Trust" and the applicant is advised to contact the Works Engineering Team by emailing Enquiries.TPWNorth@canalrivertrust.org.uk in order to ensure that any necessary consents are obtained.

The above comments are given as advice based on the consultation material. We would wish to provide more detailed comments as the preferred route emerges and the potential impact on our waterways determined. The above comments do not prejudice any further comments or matters that may be raised by the Trust at a later stage.

Protective Provisions

Due to the proximity of works to the Pocklington Canal, including works below the waterway, we consider that Protective Provisions will be necessary for the protection of the Trust during the construction, operation and any decommissioning stages of the development.

We would welcome the opportunity to discuss this further during the development of the initial Development Consent Order. To assist with the applicant's drafting, we can provide a set of 'standard' draft protective provisions for the Trust, which can be used as a basis to work from and tailor to suit this development. **We would seek to reach agreement on the provisions at the earliest possible opportunity. We would encourage the applicant to contact myself on the details below to discuss this further.**

Please do not hesitate to contact me with any queries you may have.

Yours sincerely,

Simon Tucker MRTPI
Area Planner

[redacted]@canalrivertrust.org.uk

https://canalrivertrust.org.uk/specialist-teams/planning-and-design

City of BRADFORD METROPOLITAN DISTRICT COUNCIL

Application No: 26/01879/NSIP

CONNO

TOWN AND COUNTRY PLANNING ACT, 1990 (AS AMENDED)
TOWN AND COUNTRY PLANNING (DEVELOPMENT MANAGEMENT PROCEDURE) (ENGLAND) ORDER 2015

Northern Gas Networks
C/O The Planning Inspectorate
Environmental Services, Infrastructure Divisions &
Applications Service
Planning Inspectorate
C/O QUADIENT
69 Buckingham Avenue
Slough
SL1 4PN

Consultation Response

Proposal: Scoping consultation from Planning Inspectorate for the East Coast Hydrogen Humber Pipeline.
Location: East Coast Hydrogen Humber Pipeline
Applicant: Northern Gas Networks

City of Bradford Metropolitan District Council has the following comments to make.

1. The East Coast Hydrogen project is a proposal exploring how new and existing pipelines could transport hydrogen to clean power and industry in the Humber and Teesside regions. Businesses in these industrial clusters use large volumes of gas for processes and include the manufacturers of chemicals, steel and bricks. They have plans to decarbonise and need a like for like gas replacement and see hydrogen as the most viable or only option.

The impacts of the proposal on the City of Bradford Metropolitan District Council are considered minimal, as the proposal is located some distance from the Bradford District boundary and the majority of the proposed infrastructure will be underground. Therefore, we have no comments to make on the proposal or the scoping at this juncture.

[redacted]

Richard Hollinson, Assistant Director
(Planning, Transportation and Highways)
Department Of Growth

Date of Issue:
12 June 2026
APO

DARLINGTON Borough Council

ECONOMY AND PUBLIC PROTECTION GROUP
Town Hall, Darlington DL1 5QT

Environmental Services Infrastructure Decisions and Applications Service
Planning Inspectorate

[redacted]@darlington.gov.uk
19th May 2026

By email only
eastcoasthydrogenhumber@planninginspectorate.gov.uk

Our ref:
Your ref: EN0710008
Please ask for: Lisa Hutchinson
Document Name: 2605261

Dear Sir/Madam

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

Proposed application by Northern Gas Networks (the applicant) for an Order granting Development Consent for the East Coast Hydrogen Humber Pipeline (the proposed development)

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

I write further to your letter dated 19th May 2026 regarding the above matter.

I can confirm that Darlington Borough Council has no comments to make on this occasion.

Yours sincerely

[redacted]
Lisa Hutchinson
Interim Head of Planning Development Management

Contact: Claire Teasdale
Direct Tel: [redacted]
email: [redacted]@durham.gov.uk
Our ref: AACON/26/01130

The Planning Inspectorate
C/o QUADIENT
69 Buckingham Avenue
Slough
SL1 4PN
eastcoasthydrogenhumber@planninginspectorate.gov.uk

15 June 2026

Dear Sir/Madam

Town and Country Planning Act 1990 (as amended)

Proposed Scoping Opinion Consultation from the Planning Inspectorate under the Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (The EIA Regulations) - Regulations 10 and 11

Proposed application by Northern Gas Networks (the applicant) for an Order granting Development Consent for the East Coast Hydrogen Humber 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

At East Coast Hydrogen Humber Pipeline
For The Planning Inspectorate

I write in response to your letter dated 19 May 2026 regarding the above.

Given the location of the proposed development subject to this consultation, it is unlikely to have a direct impact on the environment of County Durham and the amenity of County Durham residents. We therefore have no comments to make.

Yours faithfully

Claire Teasdale

Claire Teasdale
Principal Planning Officer

Regeneration, Economy and Growth
Durham County Council, Planning Development (Strategic), PO BOX 274, Stanley, Co. Durham, DH8 1HG
Main Telephone: 03000 262 830

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

Proposed application by Northern Gas Networks (the applicant) for an Order granting Development Consent for the East Coast Hydrogen Humber Pipeline (the proposed development)

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 18th 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 internal consultees as follows:

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

Responses were received from Transport Planning, Design, Economic Development, Environmental Control, Archaeology, Public Health and Sustainable Development (Coast). These comments have been included in this report on a topic by topic basis in the paragraphs below.

Topics scoped into the EIA

Air Quality

Section 8.2 Air Quality has been reviewed by the Council's Environmental Control section. They confirm that they are satisfied with the scoping proposal. The additional reports to be submitted as the application progresses will be subject to separate review.

Biodiversity and ecology

Have no comments at this stage. Any responses received will be sent to PINS for forwarding to the applicant.

Climate change and resilience

Have no comments at this stage. Any responses received will be sent to PINS for forwarding to the applicant.

Cultural Heritage

There are no comments on Built Heritage at this stage. Any responses received will be sent to PINS for forwarding to the applicant.

With regard to archaeology the proposed construction of the pipeline has the potential to impact on a wide range of different designated and non-designated archaeological remains/sites across the landscape of East Yorkshire. As noted in paragraph 8.5.1 of the Scoping Report a search of the Humber Historic Environment Record has not been carried out to inform the scoping report but will be completed post-scoping to help inform the route refinement. A study area of 500m from the draft order limits for non-designated heritage assets has been put forward and is considered sufficient for obtaining baseline information to assess the archaeological potential of the site.

As noted on p.97 of the Scoping Report, the baseline data collection will include:

- *Desk-Based Assessment – the sources listed are considered acceptable. However, we would recommend that the PAS database also be included. We also recommend that contact is made between the developer's archaeological representative and other large scale/NSIP schemes which intersect with the study area.*

- *Heritage Walkover Survey*

- *Aerial Photographic and LiDAR Analysis – we would also recommend that National Mapping Project data is obtained from Historic England.*

- *Geophysical Survey*

- *Geoarchaeological Survey – the geoarchaeological potential of the study area should be assessed as is proposed, with the possibility of the creation of a deposit model for areas where this would be beneficial.*

- *Pre-determination and post-determination intrusive trial trenching evaluation.*

Greenhouse Gases

Have no comments at this stage. Any responses received will be sent to PINS for forwarding to the applicant.

Ground Conditions

Have no comments at this stage. Any responses received will be sent to PINS for forwarding to the applicant.

Air Quality

Section 8.7 Air Quality has been reviewed by the Council's Environmental Control section. They confirm that they are satisfied with the scoping proposal. The additional reports to be submitted as the application progresses will be subject to separate review.

Landscape and visual amenity

Major accidents and disasters

Have no comments at this stage. Any responses received will be sent to PINS for forwarding to the applicant.

Material assets and wastes

Have no comments at this stage. Any responses received will be sent to PINS for forwarding to the applicant.

Noise and vibration

Have no comments at this stage. Any responses received will be sent to PINS for forwarding to the applicant.

Socio-economics

ERYC Economic Development have reviewed the scoping report. They agree that 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. All potentially significant socio-economic effects appear to have been identified in the relevant section.

Consideration in the socio-economic section could be given 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.

Other local plans, which may be relevant to the proposed development and require consideration include, Hull and East Yorkshire Combined Authority's Get Hull and East

Yorkshire Working Plan, and the updated Local Skills Improvement Plan (LSIP), expected to be published in summer 2026.

Other local data sources which may assist to characterise the baseline include, East Riding Intelligence Hub and East Riding Local Economic Assessment (LEA) Dashboard.
The Scoping Report suggests that the Proposed Development has the potential to generate beneficial effects in relation to employment and supply chain. East Riding of Yorkshire Council's Supply Chain Network project can support all phases of the proposed development (https://thesupplychainnetwork.co.uk). We ask that that it be included in the Environmental Statement.

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 business.

The Scoping Report does not reference an Employment and Skills Plan. We request that one be included in the Environmental Statement/DCO application.

ERYCs Public Health section have also reviewed to Scoping Report. Main comments are included in the Human Health section below. However, regarding Socio-economics they also that there has been no assessment of pressure on GP and local health services. Up to 500 construction workers will be in the area at peak, for up to four years. The socio-economics section assesses employment benefits but does not consider secondary pressures on GP practices, urgent care, pharmacy services or accommodation supply in the East Riding communities along the Rural East Riding already has limited health service capacity in some areas, and extra demand on top of that could cause real problems for local people. It is recommended that the Environmental Statement should assess whether the construction workforce could put pressure on local health services and engage with the NHS before construction begins to agree how this will be managed.

Soils and agricultural land

Have no comments at this stage. Any responses received will be sent to PINS for forwarding to the applicant.

Transport and movement

ERYC Transport Planning team have provided the following response:

Scoping Report Review

The Local Highway Authority (LHA) recognises that Section 8.14 appropriately scopes Transport and Movement into the Environmental Impact Assessment (EIA) and adopts a broadly acceptable methodology for the assessment of likely environmental impacts arising from the

Proposed Development.

The LHA agrees that the primary transport impacts will arise during the construction phase, with negligible effects anticipated during operation. However, at this stage, the assessment is high-level and subject to further refinement. Additional detailed information will be required at the

Environmental Statement (ES) stage in order to fully understand and appropriately mitigate impacts on the local and strategic highway network.

The LHA supports the inclusion of the following within the scope of the assessment:

- Construction traffic impacts (HGV and workforce movements)
- Effects on highway capacity and operation
- Impacts on road safety
- Effects on non-motorised users (NMUs), including Public Rights of Way (PRoW), National Cycle Network routes and recreational routes
- Driver delay, severance, and amenity impacts

This represents a proportionate and policy-compliant scope for a linear infrastructure project of this nature.

The LHA agree with the scoping summary table of potential likely significant effects and ES scope.

Key Issues and Observations

The LHA agrees that construction will give rise to the most significant transport effects, including:

- Increased HGV traffic associated with pipe delivery, plant and materials
- Workforce-generated traffic
- Requirement for temporary traffic management, including road closures, lane restrictions and temporary signals
- Potential disruption to local communities and rural highway users

While these impacts are acknowledged as temporary, the LHA notes that localised effects may be significant, particularly on the rural highway network within the East Riding, which is often constrained in terms of width, alignment and capacity.

At this stage, the assessment does not clearly define the study area for transport assessment, the specific highway links likely to be affected nor the baseline traffic flows and network performance.

The LHA advises that the ES must clearly define the study area in agreement with the LHA, identify all affected routes, including construction access routes and HGV corridors and provide robust baseline data, including traffic flows, junction capacity and safety records.

The location of construction compounds, access points and haul routes is not yet defined. The LHA emphasises that HGV routing strategies will be critical, particularly to avoid inappropriate use of lower hierarchy rural roads and early engagement with the LHA will be required to agree preferred routes to/from the Strategic Road Network, access arrangements to the pipeline corridor and restrictions through sensitive settlements.

It is noted that the pipeline corridor intersects some key NMU and PROW routes and these will require further assessment by the Countryside Access team separately. The Transport and Traffic Assessment should cover aspects of:

- Detailed consideration of temporary severance and diversion impacts
- Maintenance of safe and convenient access wherever possible
- Clear proposals for temporary diversions and reinstatement

The potential requirement for abnormal indivisible loads (AILs) is identified. The LHA advises that the ES should identify likely AIL routes and assess their suitability. Swept path analysis may be required for constrained junctions. Temporary works or mitigation may be necessary to facilitate safe movement. Early communication with ERYC's Abnormal loads team is advised on abnormal.loads@eastriding.gov.uk.

The LHA agrees that the operational traffic will be minimal and limited to maintenance activities and these impacts can reasonably be scoped out of detailed assessment.

Mitigation and Management

Given the scale, duration and dispersed nature of construction activities, and the sensitivity of the local highway network within the East Riding, a Transport Assessment is needed to robustly assess impacts on highway capacity, safety, network operation and non-motorised users. The Transport Assessment will also inform the preparation of an appropriate Construction Traffic Management Plan and ensure that impacts can be effectively mitigated.

The reliance on a Construction Traffic Management Plan (CTMP) is appropriate and supported in principle. However, at this stage mitigation remains high-level. The LHA requires that the ES and subsequent application include an oCTMP which should be submitted at application stage and make provision for the following:

- Agreed HGV routing strategy, including HGVs and LGVs
- Traffic management measures
- Details of pre and post construction dilapidation surveys including remedial works
- Phasing of works and associated traffic generation
- Measures to minimise peak hour impacts
- Temporary access points and details
- Temporary vehicular crossing points
- Pipeline crossing points and details, it should be noted that all classified roads and roads that have excessively long diversions or no alternate access shall be Horizontal Directional Drilling
- Construction compounds
- Haul routes and internal access tracks
- Construction Workers Travel Plan

The LHA would expect that the full Construction Traffic Management Plan (CTMP) be secured by means of a pre-construction requirement of the DCO and be developed in accordance with, and provide further detail to, the principles established within the Outline Construction Traffic Management Plan (oCTMP).

Cumulative Impacts

The LHA notes that cumulative impacts are referenced but not yet fully assessed.
The ES should include assessment of cumulative traffic impacts including other major infrastructure projects and committed developments within the area of traffic routing.

Consideration of overlapping construction programmes and network effects should be taken into consideration in the Transport Assessment.

Conclusion

The LHA considers that Section 8.14 provides an appropriate high-level framework for assessing the transport and movement impacts associated with the Proposed Development. However, the assessment remains preliminary and is subject to several key uncertainties, including the lack of a clearly defined study area and affected routes, the absence of detailed baseline traffic data, limited information on construction logistics and routing, and reliance on mitigation measures that are not yet defined in detail.

On this basis, the LHA raises no objection at the scoping stage, subject to a number of requirements being satisfied. These include the agreement of the scope and methodology of the Transport Assessment prior to submission of the Environmental Statement, the provision of detailed transport modelling and robust baseline data, the preparation of a comprehensive Outline Construction Traffic Management Plan (oCTMP) in consultation with the LHA, and a full assessment of impacts on rural networks and sensitive receptors. Appropriate mitigation must also be identified and secured to ensure that all impacts are reduced to an acceptable level.

Water resources and flood risk

The Lead Local Flood Authority (LLFA) has reviewed the Scoping Report. The inclusion of Water Resources and Flood Risk as a scoped-in topic is welcomed and the LLFA generally agree with the proposed assessment methodology outlined in the Scoping Report.

The LLFA agrees that the Environmental Statement should assess potential impacts arising from construction, operation and decommissioning activities on flood risk, ordinary watercourses, land drainage systems, Internal Drainage Board assets, floodplain storage, surface water flow routes, groundwater and water quality. Particular consideration should be given to the extensive linear nature of the development and the cumulative effects of multiple crossings of ordinary watercourses and drainage infrastructure across the route corridor.

The proposed Flood Risk Assessment should consider all sources of flooding, including fluvial, surface water, groundwater, sewer and artificial source, and demonstrate that the development will not increase flood risk either on-site or elsewhere. The assessment should also incorporate appropriate climate change allowances consistent with national guidance.

The LLFA supports the preparation of a detailed drainage strategy addressing temporary construction drainage, management of runoff from compounds, haul roads and working areas, protection of existing drainage systems, maintenance of flood conveyance routes and reinstatement of drainage infrastructure following construction.

The Environmental Statement should clearly identify all interactions with ordinary watercourses, drainage channels and IDB-managed assets and assess potential impacts on hydraulic performance, maintenance access and flood risk management operations.

The LLFA welcomes the proposed use of appropriate construction and environmental management measures, including pollution prevention controls and trenchless crossing techniques where environmentally justified. Subject to these matters being fully assessed with

the Environment Statement and supporting Flood Risk Assessment, the LLFA has no issues with the proposed scope of the Water Resources and Flood Risk Assessment.

Topics to be scoped out

Human health

ERYC Public Health section has reviewed the Scoping Report and agree that it sets out a reasonable technical framework, and the efforts to route the pipeline away from schools, care facilities and residential areas are noted. However, East Riding's distinct characteristics, a large older population, rural communities and limited local health service capacity, are not reflected in the proposed assessment approach, and a number of significant gaps need to be addressed in the Environmental Statement. These are set out below in order of priority:

1. Health has been left out of the assessment

The applicant proposes to leave health out of the formal EIA, arguing that standard environmental controls will be sufficient. For a 110km pipeline being built over four years through East Riding communities, this is not an adequate approach. Health effects will become fragmented across multiple technical chapters with no single account of their combined impact on East Riding communities. Rural settlements will have no coherent assessment of how simultaneous noise, dust, access disruption and traffic effects interact during construction. East Riding's older demographic is particularly sensitive to cumulative disruption, and without a dedicated health chapter there is no mechanism to examine this.

Recommendation: The Environmental Statement should include population and human health as a distinct topic, bringing together findings from the other chapters and assessing what the combined effect on local communities will be.

2. East Riding's older population has not been considered

Appendix K and Section 9.1 record that ERYC has the highest proportion of older residents of all four host authorities, at 26.4% aged 65 or over, and the lowest economic activity rate at 54.9%. Whilst it is mentioned, it does not consider its impact on whether older residents are more vulnerable to specific construction or operational. Older residents are more sensitive to noise, dust and disruption, access barriers and disruption to walking and daily routines. Many older residents in East Riding will also have limited transport alternatives and may rely more heavily on nearby PRoW and green space for physical activity and social contact.

Recommendation: The Environmental Statement should specifically assess how older residents along the East Riding route may be more affected than the general population and put in place targeted measures to protect them.

3. No plan to explain hydrogen safety to local communities

Most East Riding residents will have little or no knowledge of hydrogen pipelines. The report addresses safety through technical standards but makes no commitment to explaining to residents, in plain terms, what living near a hydrogen pipeline means, what happens if something goes wrong, or what the venting and flaring visible from some above-ground

installations actually involves. Without this, worry and mistrust will fill the gap. Risk perception, independent of actual risk level, is a well-established determinant of mental wellbeing and community trust.

Recommendation: The Environmental Statement should commit to a plain-English communications plan for affected communities covering safety arrangements, emergency procedures, and how and where residents can raise concerns. This should be accessible to older residents and those with limited digital access.

4. Mental health and wellbeing are not addressed

Years of uncertainty before construction even begins, followed by four years of building work, can cause real stress and anxiety in affected communities, particularly in smaller villages that are not used to this kind of disruption. This is a genuine health impact that is currently invisible in the assessment.

Recommendation: Mental health and wellbeing should be assessed as an outcome in its own right, and mitigation should include regular, accessible updates and a clear point of contact for residents throughout the project.

5. Walking routes and green space are treated as inconveniences rather than health assets

The Yorkshire Wolds Way and three National Cycle Network routes all cross the pipeline corridor in East Riding. When these routes are disrupted, the report treats it as an amenity issue. For many older and less mobile East Riding residents, a regular walk on a familiar local path is their main form of daily exercise and social contact. A closure or an unfamiliar diversion route often means people simply stop going.

Recommendation: The Environmental Statement should assess the health impact of any disruption to walking and cycling routes, ensure alternatives are genuinely accessible to older and less mobile users, and treat route restoration as a health priority.

6. No way for communities to raise health concerns during construction

Various management plans are proposed but none include any mechanism for residents to flag health-related concerns, or for anyone to track whether problems are emerging. In rural communities with fewer informal routes for raising complaints, issues such as persistent dust near a school or access problems for elderly residents could go unresolved for months.
Recommendation: The Environmental Statement should set out a clear and accessible process for East Riding residents to raise health concerns during construction.

7. Consultation does not account for rural or older East Riding residents

The Applicant commits to 'proportionate, transparent and meaningful engagement' but provides no detail on how engagement will be designed to reach rural communities, older residents or those with limited digital access. The consultation section describes the process and legal context rather than a community-centred approach.
Recommendation: The applicant should set out specifically how it will engage with rural and older East Riding residents, including non-digital approaches. Feedback loops should be clearly specified so that community input is demonstrably reflected in project development.

creating a better place
for people and wildlife

Environment Agency

Planning Inspectorate
Sent via email:
eastcoasthydrogenhumber@planninginspectorate.gov.uk

Reference: OR-0004474/01
Customer reference: EN0710008

16 June 2026

Dear Molly Harvey

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

Proposed application by Northern Gas Networks (the applicant) for an Order granting Development Consent for the East Coast Hydrogen Humber Pipeline (the proposed development)

Thank you for consulting the Environment Agency (EA) on the Environmental Impact Assessment (EIA) Scoping Opinion for the above Nationally Significant Infrastructure Project (NSIP) received on 19 May 2026.

We have reviewed the submitted documents insofar as they relate to our remit. A full list of documents reviewed is presented in Appendix 1.

We do not agree with the scope of the EIA and would recommend impacts to flood/ coastal defence assets; surface water and groundwater quality; fish and aquatic ecology; and from the operation and decommissioning of the pipeline are scoped in to meet the requirements of the EIA regulations. Please see attached Appendix 2 for detailed comments.

Please note this review is on the EIA process only. Other assessments required such as Flood Risk Assessment (FRA), Habit Regulations Assessment (HRA) and Water Framework Directive (WFD) have not been included. We would recommend the developer consult us on the scopes of these studies in due course.

Please note this response does not represent our final view in relation to any future Development Consent Order (DCO), or 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.

If you require any further details, please contact us on the email address below.

Yours sincerely,

Laura Edwards
Planning Specialist – Environment Agency
Email: NIteam@environment-agency.gov.uk

List of Appendices

Appendix 1 – List of Documents Reviewed
Appendix 2 – Detailed comments related to the scope of the EIA
Appendix 3 – General comments for consideration
Appendix 4 – Informatives and Advice to the Applicant

Appendix 1 – List of Documents Reviewed

East Coast Hydrogen Humber Pipeline Environmental Impact Assessment (Eia) Scoping Report (Volume I - Main Text)
East Coast Hydrogen Humber Pipeline Environmental Impact Assessment (Eia) Scoping Report (Volume II - Figures)

Appendix 2 – Detailed comments related to the scope of the EIA

Flood Risk

We agree that flood risk related impacts should be scoped into the assessment for all phases of the development, as set out in section 8.15 of the Scoping Report. However, we have flagged that impacts to any flood / coastal defence assets resulting from the proposed development should also be scoped into the assessment.

Document Reference(s) Section 8.15 Water resources and flood risk	
Issue	The risks posed by the proposed development on flood defence assets are not acknowledged.
Impact	Damage or degradation of defences could compromise their ability to manage flood risk, leading to increased flood risk to the proposed development as well as to third party receptors, both during and after construction.
Solution	This risk posed by the construction works to any flood risk and coastal defence assets should be scoped into the assessment. The applicant should provide full details of all flood defences and associated assets within the study area, including their current condition and construction. This will allow assessment of potential impacts to defences and any mitigation required.

Additional narrative/ explanation

The applicant will also be expected to survey the pre- and post-works condition of any assets they will interact with and remediate any defects identified. Please note that excessive vibrations during construction can also cause damage to flood defence assets, reducing their effectiveness and longevity. Therefore, we would expect vibration levels to be monitored during works and for the applicant to identify safe thresholds that would not adversely affect flood assets.

We expect any activities to have a minimum of 8 metre setback from fluvial main rivers and defences, and 16 metres from tidal main rivers and defences, wherever possible. Where this is not possible then a clear justification as to why a closer proximity is required must be provided as part of the Flood Risk Assessment.

Groundwater and Contaminated Land

Document Reference(s): Section 8.15 Water resources and flood risk

Issue	Changes to surface water and groundwater quality from the Decommissioning phase have been scoped out.
Impact	Potential for decommissioning activities to impact groundwater quality if not managed adequately.
Solution	Scope in effects to surface water and groundwater quality for further assessment.

Additional narrative/ explanation

It is anticipated that significant effects are unlikely to occur that as the pipeline would remain in-situ after the operational life of the pipeline. Decommissioning is stated to include the sealing or grouting of all connection and access points to ensure disconnection of the pipeline. If suitable mitigation is not in place this activity could result in the loss of grout or other sealant materials into the surrounding groundwater which could impact water quality and/or result in changes in groundwater flow. Due to the high sensitivity of the Chalk Principal aquifer and potential for karst solution features to be present we require further assessment and mitigation details to be provided.

Fisheries

Document Reference(s): Section 8.3 Biodiversity and Ecology	
Issue	Impacts to fish and aquatic species.
Impact	If impacts on fish are not assessed in the EIA, then the proposal may lead to harm to this receptor and loss or damage to habitat. This may also lead to a deterioration in Water Framework Directive (WFD) status.
Solution	Fish and aquatic ecology should be scoped into the EIA. Baseline data should be obtained through a desk study (including Environment Agency 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

Geomorphology

Document Reference(s): 8.3 Biodiversity and ecology - Summary of potential likely significant effects and ES scope, 8.15 - Water resources and flood risk - Summary of potential likely significant effects and ES scope	
Issue	Operational impacts and decommissioning effects for the pipeline are Scoped Out. This does not take into account changes to the hydromorphology of watercourses and the Water Framework Directive assessment.
Impact	Where the pipeline infrastructure crosses river valleys/floodplains there is a potential for increased intensity rainfall to drive both lateral and vertical movement of watercourses. It is possible that these lateral and vertical changes may lead to exposure of the buried infrastructure either during operation (increasing risk of leakage) or, more likely, after decommissioning. Changes in rainfall intensity may drive both lateral and vertical channel movement giving rise to the potential for pipeline exposure within the floodplain, even after the end of the project.
Solution	If exposure occurs during the operational lifetime of the project, consideration should be given to methods for reburial to ensure continued use of the infrastructure, possibly as part of the Operational Environmental Management Plan. As part of a Decommissioning Environmental Management Plan put in place contingencies to deal with possible future exposure of pipeline due to increased fluvial mobility, including actions to remove infrastructure left “in situ” from the environment should exposure occur. This should follow the polluter pays principle.

Appendix 3 – General comments for consideration

Flood Risk

Document Reference(s) Section 8.4 Climate change resilience and Section 8.15 Water resources and flood risk	
Issue	Section 4.11.1 states that expected design life of the scheme is a minimum of 50 years. However, in accordance with the Planning Practice Guidance for flood risk and coastal change, a minimum of 75 years is expected to be used as the design life for any assessment of flood risk.
Impact	If the Flood Risk Assessment assessed a 50-year design life this could lead to an underestimation of future flood risk, resulting in insufficient flood mitigation.
Solution	Assess and design flood risk measures using a minimum 75-year design life, which is in accordance with the Planning Practice Guidance recommendation for non-residential development.
Additional narrative/ explanation The applicant will need to consider the future flood extent of the design flood plus climate change which should be informed by the design life of the development. The developer will also need to consider the Credible Maximum Scenario in the context of climate change: Flood risk assessments: climate change allowances - GOV.UK (www.gov.uk)	

Document Reference(s): Section 8.15 Water resources and flood risk. Watercourse crossings page 210	
Issue	Flood risk could be increase if crossings are not appropriately designed.
Impact	Flood risk could be increased elsewhere.
Solution	Please ensure infrastructure, such as crossings, within watercourses are appropriately designed to remain operational during times of flooding and not increase flood risk elsewhere.
Additional narrative/ explanation It is welcomed that any infrastructure within or alongside watercourses will be designed to reduce the potential for significant detrimental impacts on flood conveyance and localised or catchment-wide impacts on flood risk.	

Any proposed access crossings should be designed so that the soffit level of any bridges or culverts sits above the design flood level with an allowance for freeboard. The design flood level for permanent crossings in areas of fluvial flood risk would be the 1% (1 in 100) annual exceedance probability (AEP) plus higher central climate change scenario. In watercourses which are tidally dominated the 0.5% (1 in 200) AEP plus higher central climate change should be considered. For temporary crossings as part of the construction phase of the scheme the present day (without climate change) 1% (1 in 100)/0.5% (1 in 200) AEP scenario can be used depending on whether the watercourse is fluvially or tidally dominated. We would ask that a freeboard of +600 millimetres is included above the design flood level. Careful consideration will need to be given to how the design flood level will be determined for any proposed crossings. Typically, this would be determined by undertaking hydraulic modelling or referring to existing detailed hydraulic modelling data (where available and suitable). Any proposed crossings should be designed such that they do not increase flood risk elsewhere.

Document Reference(s): Section 8.15 Water resources and flood risk. Loss of floodplain storage page 210	
Issue	Limited detail on when and where flood compensation will be provided.
Impact	Flood risk could be increased elsewhere.
Solution	Where there is a loss of flood storage in the design flood event, appropriate level-for-level/volume-for-volume compensation should be provided.

Additional narrative/ explanation

This section notes that any infrastructure impacting the floodplain and areas of high and medium flood risk will be accompanied by a suitable floodplain compensation strategy to include measures to manage the impacts of loss of floodplain storage or conveyance. This is welcomed, although the applicant should be cognisant of paragraph 5.8.12 within the Overarching Policy Statement for Energy (EN-1) which states that development should be designed to ensure there is no increase in flood risk elsewhere. Where there is a loss of flood storage in the design flood event that results in an increase in flood risk elsewhere appropriate level-for-level/volume-for-volume compensation should be provided. Please see Flood risk assessments: climate change allowances - GOV.UK for further details on how to establish the design flood event for the development based on the development vulnerability classification.

Document Reference(s): Section 8.15 Water resources and flood risk. Flood Risk Assessment page 216	
Issue	Use of existing flood risk datasets.
Impact	The assessment of flood risk could be inaccurate.
Solution	For the applicant to check any modelling data they use in line with guidance on using modelling for Flood Risk Assessments available online at: Using modelling for flood risk assessments - GOV.UK. Please ensure any data used provides a reasonable assessment of current and future baseline conditions.

Additional narrative/ explanation

In the context of modelling and existing datasets it is important to note that checks should be undertaken to ensure that any existing modelling which is used to inform the FRA represents current and future baseline conditions and uses the most appropriate and up to date fluvial and tidal boundary conditions (where applicable). Some of the modelling held by the Environment Agency for the Main Rivers crossed by the Order Limits for the development uses climate change allowances which have now been superseded.

The applicant should check any modelling data used is in line with guidance on using modelling for Flood Risk Assessments available online at: Using modelling for flood risk assessments - GOV.UK. For information regarding climate change allowances to use for Essential Infrastructure projects please refer to: Flood risk assessments: climate change allowances - GOV.UK

Fisheries Biodiversity and Geomorphology

Document Reference(s): Section 4.5 Construction activities, 4.5.11	
Issue	Open-cut crossing of watercourses will be used as part of pipeline installation, to create trenches for pipes and cables.
Impact	Unnecessary impacts to watercourses with open-cut crossings when there is a method which will avoid open-cut crossing. Open-cut crossing may involve damming and draining down of a section of watercourse leading to loss of habitat, including those of protected species such as the water vole, desiccation to aquatic fauna and flora and fragmentation to fish migration; and habitats.
Solution	According to the mitigation hierarchy, the impact should be avoided first, and so trenchless methods should be committed to where

	crossing watercourses, particularly where there is suitable habitat for fish. Consider suitability of open cut crossings on a case-by-case basis, taking into account sensitive and/or unique morphology and associated habitats. To aid in reinstatement of bedforms and bankside morphology, excavated materials should be placed into the same locations and depths as excavated from. Geological horizons should not be mixed. 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.
Additional narrative/ commentary General advice on watercourse crossings, for pipelines/cables and access, can be found in Appendix 4. 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. Especially where watercourse is wet for most of the year, can destroy in channel features and destabilise banks unless reinstated to pre-cut condition. Even with reinstatement, inherent weakness may still exist within the “cut” section, leading to the establishment of preferential erosion pathways. Open cut may also lead to degradation in any sensitive habitats/geomorphology that may be present in the watercourse due to pooling of water upstream of the cut section, and interrupted flow regime downstream of the cut section due to the necessity of working in the dry.	

Document Reference(s): 4.3 Design Principles Section 4.5.12	
Issue	There is no mention regarding construction of culverts as crossings to facilitate access as part of preparatory works.
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.

Document Reference(s): 4.3 Design Principles Section 4.5.14	
Issue	The scheme is a linear project, involving the installation of pipelines and cables via trenching across a corridor.
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.

Document Reference(s): Section 8.15 Water Resources and Flood Risk – Embedded measure, design	
Issue	Diversion of watercourses.
Impact	Diversions of watercourse can result in the loss of habitat and fragmentation of habitat.
Solution	We need to be consulted on the details of any proposals to divert watercourses, whether temporary or permanent. The micro-siting of any diversions must ensure that good quality aquatic habitat is not lost.

Document Reference(s): Section 8.15 Water Resources and Flood Risk – Embedded measures, construction	
Issue	Mitigation to protect fish.
Impact	Entrainment of fish in to pumps during drain downs for in channel.
Solution	In order to protect fish, any over pumping must ensure that fish rescues are put in place before any works where fish could become stranded. Additionally, any pumps must be fitted with 2mm aperture screens to prevent the entrapment of fish, including European eel.

Document Reference(s): 8.3 – Biodiversity and Ecology Section(s): 'Legislation, planning policy context and guidance'

Issue	Section does not reference Biodiversity Net Gain (BNG) law.
Impact	Risk of not considering environmental definitions in legislation in respect of BNG, such as 'irreplaceable habitat', along with related offences to said habitats.
Solution	Please include the following legislation, policy and guidance: Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2024, for completeness.

Document Reference(s): 8.3 Biodiversity and Ecology Section(s): 'Biodiversity and ecology scope and methodology'	
Issue	Invasive Non Native Species (INNS) surveys have been planned, but there is no mention of producing a INNS or Biosecurity Management Plan to manage and prevent the spread of INNS.
Impact	Lack of biosecurity planning can lead to the accidental spread of INNS. Without an INNS Management Plan, there is also the risk of not appropriately responding to/managing INNS should they be discovered during construction. Lack of INNS planning can lead to accidental spread, which is an offence under the Wildlife and Countryside Act 1981.
Solution	Submit an INNS or biosecurity management plan as part of the Environment Statement. A pathway specific risk assessment should be considered identifying any pathways for spread during construction, operation and decommissioning.

Document Reference(s): Section 4.11 Decommissioning	
Issue	Intention to leave pipeline in situ following decommissioning of the project once it has got to "end-of-life".
Impact	Whilst for most areas this would probably be an acceptable outcome – reducing disturbance to habitats etc that have developed during time of construction and time of decommissioning, care should be taken within flood plains/river valleys. Climatic change effects, such as increased rainfall intensity, may lead to increased fluvial activity and possible head-cuts, especially with base level increasing due to sea level rise. Increased lateral mobility of rivers, bed incision and head-cutting may

	lead to exposure of pipeline either before or more likely after pipeline “end-of-life".
Solution	Following the polluter pays principle, put in place, as part of a Decommissioning Environmental Management Plan, contingencies to deal with possible future exposure of pipeline due to increased fluvial mobility, including actions to remove pipelines from the environment should exposure occur.
Additional narrative/ explanation If exposure occurs during the operational lifetime of the project, consideration should be given to methods for reburial to ensure continued use of the infrastructure, possibly as part of the Operational Environmental Management Plan.	

Document Reference(s): EIA Scoping	
Issue	Further information is needed on potential changes in geomorphology over the lifetime of the project.
Impact	Not considering potential for geomorphic change, especially for a project with a long operational lifetime, may lead to unintentional consequences, such as pipeline exposure and potential for leakage. Exposure after decommissioning may lead to potential environment incidents, e.g. where formerly buried infrastructure is left exposed in a migrated river channel. Burial of pipeline at insufficient depth may also reduce opportunities for floodplain restoration/reconnection and potentially lead to a detriment in WFD status.
Solution	Due consideration should be given to potential geomorphic change that could occur during and after the lifetime of the project. See the general considerations in Appendix 4.

Groundwater and Contaminated Land

Document Reference(s): Scoping Report Section 3 The site and surrounding area	
Issue	The Section does not mention groundwater setting or vulnerability status.
Impact	It is not clear to the reader that sensitive groundwater receptors (other than Groundwater Dependent Terrestrial Ecosystems) are present.
Solution	The applicant should provide a summary of groundwater receptor sensitivity.

Document Reference(s): Scoping Report Section 4 The Proposed Development	
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 no controlled by suitable management plans.
Solution	Ensure the Environmental Statement is supported by a full suite of outline management plans. See detail below.

Additional narrative/ explanation

Consider including:

- Construction Surface Water Management Plan
- Drainage Strategy – including pollution prevention measures
- Outline Construction Environmental Management Plan (OCEMP)
- Outline Operational Environmental Management Plan (OOEMP)
- Outline Decommissioning Environmental Management Plan (ODEMP)
- Foundation Works Risk Assessment

Document Reference(s): Scoping Report Section 4.2.4, 4.2.17, 4.2.20, 4.5.11 The Proposed Development	
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 narrative/ explanation

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.

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.

Figure 8.3 shows the locations of proposed modified and new Above Ground Installations (AGIs) within the Proposed Development. Of these, several appear to be located in areas with high groundwater sensitivity:

- M-2 Principal aquifer bedrock, Source Protection Zone (SPZ) 2
- N-1 Superficial and bedrock Secondary A aquifer
- M-3 Superficial Secondary A aquifer, bedrock Principal aquifer, SPZ3
- N-2 Superficial Secondary A aquifer, bedrock Principal aquifer, SPZ3
- N-3 no superficial cover, bedrock Principal aquifer, SPZ3
- N-4 Superficial Secondary A aquifer
- N-5 Superficial Secondary A aquifer, bedrock Principal aquifer

AGI N-3 in particular is of concern due to the combination of absence of superficial cover, underlying Principal aquifer and presence of SPZ3.

Document Reference(s): Scoping Report Section 4.3.1 The Proposed Development	
Issue	Trenchless crossing methods to cross sensitive features and infrastructure.
Impact	If not assessed and mitigated adequately, trenchless crossing methods could directly or indirectly introduce pollutants into sensitive groundwater bodies and introduce preferential flow pathways resulting in mixing of discrete groundwater bodies. If insufficient mitigation is in place this could also cause saline intrusion into the East Yorkshire Chalk aquifer.
Solution	Commit to produce 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. Also produce a drilling fluid breakout plan to mitigate risks associated with drilling fluids. These should be secured under the Construction Environmental Management Plan and informed by ground investigation data.

Additional narrative/ explanation

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 potentially for this particular test.

Document Reference(s): Scoping Report Section 4.3.1 The Proposed Development	
Issue	The Applicant proposes to employ trenchless crossing methods in an area which may contain karst and other dissolution features.
Impact	Trenchless drilling techniques and piling activities could impact groundwater quality and flow patterns if these interact with karst features.
Solution	Assess the potential for karst features to be present within the Proposed Development and identify mitigation measures to minimise impacts to groundwater quality and flow.

Additional narrative/ explanation
The British Geological Survey (Karst report series - BGS Groundwater) identifies most of the area in which the Proposed Development is located as likely to contain karstic or other solution features. The groundwater flow rate in these features can be significantly higher than that in the surrounding bedrock. Therefore, these natural features can act as rapid pathways for any pollutants or for escape of pumped concrete. Piling, other foundations, or other penetrative works at depth including trenchless drilling activities that could disrupt groundwater flow may result in reactivation of previously dormant features. As such any Piling Works Risk Assessment, Construction Environmental Management Plan or other assessment and plans relating to ground conditions and the sub surface water environment, should include methods and mitigations that minimise risks from interactions with these features, especially in areas of heightened groundwater sensitivity i.e. Source Protection Zones, Springs and Groundwater Dependent Terrestrial Ecosystems.

Document Reference(s): Scoping Report Table 4.1 The Proposed Development	
Issue	Interaction between the Proposed Development and Source Protection Zones (SPZ) 1, 2 and 3.
Impact	Potential for avoidable significant effects to potable water supply abstractions.
Solution	Seek to avoid SPZ1 where practicable, and to treat minimisation of intersection only where this is unavoidable.
Additional narrative/ explanation Wherever practicable also avoid siting Above Ground Installations, Block Valve Station and temporary construction compounds within SPZ1 to minimise the risks to the associated potable abstractions.	

Document Reference(s): Section 8.16 Topics scoped into the EIA	
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 narrative/ explanation

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.

Document Reference(s): Section 8.7.1 Ground Conditions	
Issue	The report is inconsistent when summarising the aquifer status of the Study Area.
Impact	Potential for confusion in the reader.
Solution	Ensure it is clear which aquifer classifications apply to the bedrock and superficial deposits respectively.

Document Reference(s): Section 8.7.1 Ground Conditions	
Issue	The report does not identify Special Sites within the Study Area.
Impact	Potentially significant contamination sources may not have been identified.
Solution	Ensure that any designated Contaminated Land within the Study Area is identified.

Additional narrative/ explanation

Our records indicate the historic Brandsholme Landfill, which if identical to High Brandsholme Farm Landfill intersects with the Proposed Development, was designated as Contaminated Land in 2001. Our records show that High Brandsholme Farm historic landfill site was licensed to receive inert, industrial, commercial, household and liquid sludge wastes. It is listed as receiving Street sweepings, cesspool contents, sewage sludge, incinerator plant residues, ash and clinker and incinerator plant residues (screenings).

East Riding of Yorkshire Council's Contaminated Land Register (Contaminated land) lists Low Brandsholme Landfill Site, Hull as a former Special Site, designated in 2001 due to a potentially significant risk to controlled waters associated with ammonia-rich leachate contamination, which is listed as de-registered in 2007 following intrusive site investigation and updated risk assessment.

Hull City Council's Contaminated Land Register (Summary of Part 2A Public Register) appears to list the same site as Brandsholme Land Fill / Land Raise Site.

Document Reference(s): Section 8.7.1, Ground Conditions Section 8.10 Material assets and waste	
Issue	We would expect to see detailed consideration of each authorised and historic landfill identified within the Study Area at later stages of the Development Consent Order process. Including details of the wastes received at these sites and any containment systems. Section 8.10 'Material assets and wastes' 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 the excavation within permitted and historic landfill and subsequent development on the landfill, has not been mentioned.
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 tranches 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 Construction Quality Assurance. 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 in Appendix 4.

Additional narrative/ explanation

The applicant should 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 Environment Agency's National Permitting Service as early as possible.

Document Reference(s): Section 8.7.1, Section 8.10 Ground Conditions, Material assets and waste	
Issue	The Proposed Development will cut across the permitted Little Weighton Cutting landfill. It is not clear from the submitted documents how the pipeline 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 narrative/ explanation

The Proposed Development should not compromise any engineered controls at new and historic landfills unless this is unavoidable.

Document Reference(s): Section 8.7.1 Ground Conditions	
Issue	Procedures for managing unexpected contamination encountered during and beyond the construction are stated to be established in the final Construction Environmental Management Plan (CEMP).
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 OCEMP, OOEMP and ODEMP, including a watching brief and Discovery Protocol.

Additional narrative/ explanation

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).
4. 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.

Document Reference(s): Section 8.7.1 Ground Conditions	
Issue	Hydrocarbon wells have not been assessed.
Impact	If present within the Study Area, the drilling and operation hydrocarbon wells may have resulted in the presence of mobile contamination which the Proposed Development could cause to impact controlled waters if not identified and mitigated against.
Solution	The applicant should review British Geological Survey hydrocarbon well data and determine whether any of these features may affect the Proposed Development.

Document Reference(s): Section 8.15 Water resources and flood risk	
Issue	Thermal effects during the operational phase have not been considered.
Impact	Thermal plumes generated by operation of the Proposed Development could impact sensitive controlled water receptors.
Solution	The applicant should assess potential thermal effects.

Additional narrative/ explanation

Heat as a groundwater pollutant was introduced in 2023 via the Environmental Permitting (England and Wales) (Amendment) (England) Regulations 2023 SI No.2023/651:

""pollutant", in relation to England, means any—

4. *substance,*
5. *heat, or*
6. *biological entity or micro-organism,*

which is liable to cause pollution;"

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. In those rare instances where 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 currently 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

Document Reference(s): Section 8.15 Water resources and flood risk	
Issue	The listed embedded measures do not include the avoidance or minimisation of interaction with Source Protection Zones, Drinking Water Safeguard Zones and Drinking Water Protected Areas. Drinking Water Safeguard Zones are also not considered anywhere within the report.
Impact	Avoidable impacts to these sensitive receptors could occur from the Proposed Development.
Solution	The Applicant should commit to the avoidance of SPZ1, SPZ2 and Drinking Water Safeguard Zones and Drinking Water Protected Areas where reasonably practicable, or to minimise interaction between the Proposed Development and these areas where unavoidable. The Applicant should ensure that Drinking Water Groundwater Safeguard Zones are identified and assessed.

Additional narrative/ explanation

The Draft Order Limits area directly intersects an extensive SPZ1 and SPZ2 area in the north of Cottingham, a more localised SPZ1 and SPZ2 area west of Carlton and a localised SPZ1 north of Knottingley, and an SPZ2 area to the east of Carlton. The Draft Order Limits area also extends within 1km of several more SPZ1 and SPZ2 areas.

Although the Draft Order Limits area does not overlap any Drinking Water Surface Water Safeguard Zones (DWSWSGZ), our records show the Elvington & Loftsome Bridge Drinking Water Surface Water Safeguard Zone and Derwent from Elvington Beck to River Ouse Drinking Water Surface Water Protected Area both extend to within 100m of the Proposed Development near Howden. The route also passes through four Drinking Water Groundwater Safeguard Zones:

- Dunswell
- Goosehouse
- Carlton East
- Great Heck and Pollington

Document Reference(s): Section 8.15 Water resources and flood risk	
Issue	The outline CEMP is likely to include mitigation measures including the use of semi-permeable surfacing in laydown areas, and bunding of hazardous materials storage areas.
Impact	If not specified as impermeable, bunding may not adequately contain hazardous materials.
Solution	The applicant should ensure that any bunded areas are fully impermeable.

Document Reference(s): Section 8.15 Water resources and flood risk	
Issue	The applicant proposes to review existing ground investigation data, and where necessary carry out new investigations, in areas of Principal Aquifer.
Impact	Characterisation of ground conditions in areas of potential contamination and in other areas with sensitive groundwater receptors may not be adequate.
Solution	The applicant should also ensure that ground conditions are adequately characterised, with respect to contamination status and groundwater flow and level information, where sensitive groundwater receptors are within potential influencing distance including Source Protection Zones, licensed and private abstractions, Principal and Secondary A aquifers, Groundwater Dependent Terrestrial Ecosystems (GWDTEs) and Drinking Water Groundwater Safeguard Zones.

Document Reference(s): Section 8.15 Water resources and flood risk p207	
Issue	The report lists potential impacts from construction dewatering activities, however the list does not include effects on designated and potential Groundwater Dependent Terrestrial Ecosystems (GWDTEs).

Impact	Potential for GWDTEs to be impacted by construction dewatering activities if not adequately assessed and mitigated where necessary.
Solution	The applicant should include consideration of dewatering impacts on GWDTEs as well as surface water bodies.
Additional narrative/ explanation The applicant should identify and assess potential GWDTE sites as well as existing designated GWDTEs, and where influencing distance of the Proposed Development should commit to mitigation measures to manage impacts on groundwater levels and quality.	

Document Reference(s): Section 8.15 Water resources and flood risk p207	
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 Outline Construction Environmental Management Plan (oCEMP).
Additional narrative/ explanation 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.	

Document Reference(s): Figure 8.9	
Issue	Several licensed abstractions within the Study Area are absent from the figure.
Impact	Sensitive groundwater abstractions may be overlooked and could be impacted by the Proposed Development.
Solution	The applicant should ensure all known abstractions within the Study Area are identified and assessed for the Environmental Statement.

Additional narrative/ explanation
The applicant should request details of licensed abstractions from the Environment Agency. Information on unlicensed abstractions should be identified from information requests with the Local Authorities within which the Study Area lies, review of historic mapping to identify potentially active wells and springs, and a review of British Geological Survey data including water wells and borehole records.

Document Reference(s): Section 8.15.1 Water resources and flood risk	
Issue	The report identifies one licensed groundwater abstraction within the study area listed as for pollution remediation.
Impact	Potential for construction dewatering to affect remediation abstraction and / or to alter groundwater flow patterns locally causing migration of existing groundwater contamination.
Solution	The Applicant should assess risks associated with the remedial abstraction and associated pollution, and determine mitigation measures.

Water Quality

Document Reference(s) Section 4.3.4 Environmental and social design aims	
Issue	There is no mention of containment of water contaminated with silt or other contaminants due to rainfall derived run-off. It is not sufficient to have a 10m offset; containment and management steps should be put in place.
Impact	If untreated construction site drainage was to reach the watercourse it could cause it to have a pollution incident from silt or in contaminated areas chemicals entering the watercourse.
Solution	Make sure that the watercourses and land drainage is protected from unintentional discharge of construction site run-off, by having a proper plan to contain and treat rainfall derived construction site run-off.
Additional narrative/ explanation The Applicant should be aware of **Pollution prevention for businesses - GOV.UK** and **Oil storage regulations for businesses - GOV.UK** An outline Construction Environmental Management Plan (oCEMP) should include: - Buffer distances of at least 10m from watercourses from top of bank.	

- Refuelling to only take place on impermeable surfaces, and in bunded areas. - Chemical, oil and fuel storage to be bunded, with impermeable base, volume sized for 110% and covered to protect from accumulation of rainwater. - Parking areas and temporary construction compounds should use drip trays and oil interceptors. - Concrete/cement works should be minimised during heavy precipitation events and carried out during dry months. Pre-cast units could be used where possible. - Collecting and removing any contaminated water from site (i.e. from wheel wash and concrete washout facilities), and not allowing this to be discharged to surface waters.

Document Reference(s): Section 4.5.5 Site preparation	
Issue	Site set up should include installation of temporary drainage and silt fencing.
Impact	If temporary drainage is not set up but vegetation is stripped then there is a risk of silt laden water being discharged to nearby watercourses and in contaminated area's possible discharge of contaminated water to controlled waters. This could result in a pollution incident.
Solution	Plan to include temporary drainage and silt management in the site preparation.

Document Reference(s): Section 4.5.7 Construction compounds	
Issue	When siting construction compounds the applicant needs to consider where sewage derived from the compounds will be discharged, will they go to sewer, discharge to ground or surface waters (this would require a permit) or be tankered away.
Impact	If the discharge cannot be made to sewer and without a treatment system and proper assessment as to the impact of any sewage discharge then it could lead to the pollution of controlled waters.
Solution	Plan effectively where potential discharges of sewage effluent could be required, If the discharge is not to sewer, then a sewage treatment plant and permit will be required before any discharge can take place. Take into account the space required for the treatment system and discharge route.

Document Reference(s): Section 4.5.19 Trenchless pipeline installation	
Issue	Where trenchless crossing installation methods are used it need to be clear what drilling fluids, lubricants and additives will be used and this should be considered as part of the EIA. 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 Environmental permit would be required.
Impact	If any drilling fluids, lubricants and additives were discharged without a permit and assessment they might be liable to pollute controlled waters
Solution	Be clear what drilling fluids, lubricants and additives are being used and their potential for carry over in any discharge. Assess the impact that would have on the waterbody and apply for a permit. A commitment to produce a drilling fluid breakout management plan should be included in the CEMP.

Document Reference(s): Section 4.5.20-4.5.23 Above Ground Installations installation	
Issue	There is no discussion of the management of construction site rainwater run-off or of abstracted groundwater.
Impact	Discharge of silty/contaminated rainwater derived rainwater can cause a pollution incident. Groundwater, even of naturally occurring quality, can have a potentially detrimental effect on surface waters and can be liable to cause pollution.
Solution	Draw up a plan to manage construction site rainwater run-off and/or abstracted groundwater. An assessment of the suitability of any discharge if required should be made and an Environmental permit may be required.
Additional narrative/ explanation The Applicant should make is clear which SuDS are proposed at which areas of the site, and how they will be used to improve water quality. Each SuDS will require a maintenance schedule commitment to ensure they perform optimally. This can be informed by the CIRIA SuDS Manual (C753F).	

Document Reference(s): 8.15 Water resources and flood risk Water resources and flood risk scope and methodology, Potential impacts pp. 207	
Issue	Bullet point with “earthworks, site clearance and ground disturbance leading to potential sediment releases” should also include stockpiles and concrete works.
Impact	Stockpiles are mentioned in the report as being required, they should be included in silt prevention considerations as they can shed a lot of silt unless they are vegetated or proper silt fencing is in place. Without proper controls silt laden water could make its way to the watercourse and cause a pollution incident. Concrete is a known source of hazardous substances, particularly during the curing phase

Solution	Include stockpiles and concrete in the noted activities for impacts.

Document Reference(s): 8.15 Water resources and flood risk Water resources and flood risk scope and methodology, Operation 212	
Issue	Fires at AGIs should be considered as a risk to ground and surface waters and satisfactory mitigation put in place to protect these from firefighting waters.
Impact	Firefighting waters can be very detrimental to the watercourses and to groundwater and could lead to the pollution of controlled waters.
Solution	Information should be provided explaining how the drainage systems will be set up in such a way that allows for them to be closed off from the environment in the case of fire. Enough storage for fire water should also be provided, as should a plan as to what will happen to that water and what maintenance will be carried out to the drainage system before normal drainage resumes.

Document Reference (s): 8.15 Water resources and flood risk scope and methodology - Assessment methodology: Baseline conditions and surveys [pp.214]	
Issue	Water quality monitoring There is no mention of water quality monitoring, only mention of 'baseline water environment walkover survey'.
Impact	If water quality monitoring is not appropriate 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	A water quality monitoring plan should be provided when the Environmental Statement is produced. This should clarity locations, frequency, quantity and possible methods of monitoring. There should be pre-construction, during construction and post-construction phases of water quality monitoring. The Applicant should confirm how they intend to secure existing monitoring commitment i.e. through the Construction Environmental Management Plan (CEMP).

Environment Agency Owned Land

As the pipeline may affect Environment Agency land, the Estates team will need early involvement. Please could Estates be kept updated as the project progresses so that any agreements required can be arranged.

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for people and wildlife

customer service line 03708 506 506
gov.uk/environment-agency

Appendix 4 – Informatives and Advice to the Applicant

Flood Risk
General comments

The order limits for the development cross several watercourses and Environment Agency Main Rivers. The Environment Agency hold detailed hydraulic modelling data for some, but not all the watercourses crossed by the order limits. We would recommend requesting Product 5, 6, and 7 information from the respective Environment Agency Area Team. Detailed hydraulic modelling data for watercourses within Yorkshire can be requested via neyorkshire@environment-agency.gov.uk.

Model review

Please check any modelling data you use in line with guidance on using modelling for Flood Risk Assessments available online at: Using modelling for flood risk assessments - GOV.UK. Any fluvial/tidal flood risk modelling which is developed or updated to inform the construction and with development proposals should be reviewed by the Environment Agency. It is recommended that modelling methodologies are agreed with the Environment Agency prior to undertaking any detailed modelling work.

Sequential approach to site layout

In accordance with the National Planning Policy Framework and the sequential test (paragraph 168), development should apply a sequential, risk-based approach to the location of development, taking account of all sources of flood risk and the current and future impact of climate change, to avoid (where possible) flood risk to people and property. The project should take a sequential approach where it can, and if there are any opportunities for development to be located outside of Flood Zones 2 and 3 this should be prioritised. A sequential approach should be taken to any site layout decisions within the site boundary, locating the most vulnerable elements of the development to areas of the lowest risk. The most vulnerable development may be any equipment that would be damaged by flood waters.

Humber 2100

We welcome acknowledgement of Humber 2100+ within the scoping report. Please note the latest position on Humber 2100+ can be found here: Humber 2100+ | Engage Environment Agency, or by contacting the Environment Agency.

The Humber 2100+ Partnership is developing a new strategic approach for managing tidal flood risk in the long term. The Humber 2100+ area of interest encompasses most of the pipeline route. 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, for example, using land differently, working with natural processes, and 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. This helps us to avoid short term decisions that could impact future options, prepare for solutions that require longer lead-in times, such as major infrastructure or land use changes, and to stay responsive to new evidence and changing conditions.

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. We encourage the pipeline team to remain connected to the work of the Humber 2100+ Partnership. This is to identify opportunities for alignment, and to ensure the latest evidence can be considered as pipeline plans develop.

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

Paull Holmes Strays

Paull Holmes Strays wildlife site is outside the scoping boundary, though close to it, and there would appear to be the potential for the pipeline or, more likely, connected work, to affect the site. Paull Holme 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 compensatory measures for adverse effects* should be given the same protection as sites covered by the Habitats Regulations and an Habitats Regulations Assessment (HRA) will also be required. As Natural England are best placed to advise on compliance with the habitats regulations, we defer to their expertise and response regarding the HRA, and any measures needed to reduce risks to sensitive wildlife receptors.

Paul Holme Strays is owned by the Environment Agency, and the site is managed with Yorkshire Wildlife Trust.

Flood Risk Activity Permit (FRAP) informative

The Environmental Permitting (England and Wales) Regulations 2016 require a permit 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 culvert (16 metres if tidal)
- On or within 16 metres of a sea defence

- Involving quarrying or excavation within 16 metres of any main river, flood defence (including a remote defence) or culvert
- In a floodplain more than 8 metres from the river bank, culvert or flood defence structure (16 metres if it's a tidal main river) and you don't already have planning permission.

For further guidance please visit https://www.gov.uk/guidance/flood-risk-activities-environmental-permits or contact our National Customer Contact Centre on 03702 422 549.

The applicant should not assume that a permit will automatically be forthcoming once a Development Consent Order (DCO) has been approved, and we advise the to consult us at the earliest opportunity.

Disapplication

If any of the works are likely to require a FRAP, we recommend that you inform the Environment Agency at the earliest opportunity as to whether you are seeking to disapply the Environmental Permitting Regulations (England and Wales) 2016 for flood risk activities as part of the DCO. Please note that the DCO will need to include protective provisions for our benefit if the disapplication of FRAPs is sought.

Main river crossings

We recommend the use of Horizontal Directional Drilling for any crossings below a designated Main River. These should have a 5m or greater depth below the river bed level, but additional depth requirements may be necessary depending on proximity to flood defences.

As the proposal develops it would be beneficial to have a Crossing Register with the proposed main river crossing placements and types.

Please note we would generally oppose the culverting of any main river and instead recommend the installation of a clear-span bridge crossing.

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 Water Framework Directive (WFD) mitigation measures/Biodiversity Net Gain (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 10km/2 connected to a downstream WFD waterbody take the classification of that waterbody.

ii. 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 our satisfaction.
- 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 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 in regard to river crossings can be found in the following document:

SEPA, 2010. Engineering in the water environment: good practice guide River crossings Second edition. SEPA

Watercourse 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.

Water Quality
Water resources and flood risk scope and methodology - Assessment methodology: Baseline conditions and surveys
Water quality and WFD Assessment advice
There will need to be a WFD Assessment - see below for some guidance.

We recommend the Applicant uses the Water Quality Explorer for available data for the baseline: **Map Explorer | Water Quality Explorer**

This advice summarises the requirements of The Water Environment Regulations 2017 in relation to Nationally Significant Infrastructure Projects: **Nationally Significant Infrastructure Projects: Advice on the Water Framework Directive - GOV.UK**

This advice is not limited to estuarine and coastal waters in England, the guidance sets out general principles and a staged approach to assessment that the can be used for other water bodies such as rivers, lakes and groundwater: **Water Framework Directive assessment: estuarine and coastal waters - GOV.UK**

Groundwater and Contaminated Land

Scoping Report Section 8.7.1, Section 8.10

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.

Document Reference(s): Scoping Report Section 8.7
Of the potential impacts scoped in for the construction phase, one is "potential for pollution of groundwater resources as a result of leaching of contamination and vertical migration of groundwater, particularly as a result of leaching of contamination and vertical migration of groundwater."

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.

Document Reference(s): Scoping Report Section 3.3.15

The report lists Water Framework Directive (WFD) areas but does not include discussion of WFD groundwater bodies. These are mentioned later in Section 8.15 and should be referenced consistently.

Document Reference(s): Scoping Report Section 8.16

The report states that a Desk Based Assessment will be prepared using publicly available data, including a Groundsure report or similar. The Desk Based Assessment should be carried out in accordance with the Environment Agency's Land Contamination Risk Management guidance, and should include a review of historic mapping to identify potential sources of contamination.

Document Reference(s): Scoping Report Section 8.16

We encourage the Applicant to commit to avoiding the use of per- and polyfluoroalkyl substances (PFAS) coated bentonite products in drilling muds and borehole construction, for ground investigation and construction activities including trenchless drilling.

Informative: 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.

Informative: 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 - GOV.UK

The applicant may also need to consider discharge of groundwater, especially if it is contaminated. More information can be found on our website: Discharges to surface water and groundwater: environmental permits.

The use of drilling muds for directional drilling may require a groundwater activity permit unless the 'de minimis' exemption applies. Early discussion about this is also recommended.

Informative: 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 Governments 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.

Waste

Informative: 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 excavated material arising from site during remediation 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:

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

Informative: Waste to be taken off-site

The Waste (England and Wales) Regulations 2011 for dealing with waste materials are applicable to anyone who produces, carries, keeps, disposes of, treats, imports or has control of waste in England or Wales.

The law requires anyone dealing with waste to keep it safe and make sure they deal with it responsibly. They must only pass it to someone authorised to take it. You can find the waste duty of care code of practice here: Waste duty of care code of practice - GOV.UK
If you need to register as a carrier of waste, please follow the instructions here: Register or renew as a waste carrier, broker or dealer - GOV.UK. If you require any local advice or guidance, please contact your local Environment Agency office.

Movement of waste off-site – Duty of Care & Carriers, Brokers and Dealers Regulations Characterisation and classification of waste
Advice to applicant

In order to meet the applicant's duties under the waste hierarchy and obligations under the duty of care, it is important that waste is properly classified. Some waste (e.g. wood and wood-based products) may be either a hazardous or non-hazardous waste dependent upon whether or not they have had preservative treatments. Proper classification of the waste both ensures compliance and enables the correct onward handling and treatment to be applied. In the case of treated wood, it may require high temperature incineration in a directive compliant facility. More information on this can be found here: Classify different types of waste: your legal responsibilities - GOV.UK.

If excavated materials are to be used on the development site, the applicant will need to 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…') for waste controls to not apply to their use. Meeting these criteria will mean environmental permitting requirements do not apply.

Where the developer cannot meet the criteria, they will need an appropriate environmental permit from us or to register an exemption.

A deposit of waste to land must either be a disposal or a recovery activity. The legal test for recovery is set out in Environmental Permitting (England and Wales) Regulations 2016, and is defined in schedule 9 and/ or schedule 1A (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 WFD here: Environmental permitting guidance: The waste framework directive - GOV.UK

More information on the definition of waste can be found here: Legal definition of waste guidance - GOV.UK

More information on the use of waste in exempt activities can be found here: Waste exemption guides - GOV.UK

The Environment Agency does not regulate non-waste operations. The person producing the material will need to decide if it is waste or a by-product. If it is waste they can consider if it meets End of Waste criteria. You can check if your material is waste or get an opinion from the definition of waste service on if a material is a by-

product or meets ‘end of waste’ status. There is a cost for this service.

The waste hierarchy & resource management in relation to construction Wastes Informative
The developer must apply the waste hierarchy as a priority order of prevention, re-use and recycling before considering other recovery or disposal options. Government guidance on the waste hierarchy in England can be found here: Waste hierarchy guidance.

Site Waste Management Plans (SWMP) are no longer a legal requirement in England, however, in terms of meeting the objectives of the waste hierarchy and your duty of care, they are a useful tool and considered to be best practice. Other best practice approaches are found in the Waste Prevention Programme for England.

Resource efficiency & the circular economy
The circular economy is a concept designed to keep materials/resources in use as long as possible and maintaining the highest possible value state, thus promoting resource efficient practice and deriving economic benefits. Adherence to the waste hierarchy and adoption of best practice in relation to Resource Management Plans will help you deliver against circular economy objectives.

Management and reporting systems
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 Publicly Available Specification PAS 402: 2025, 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.

Permitting

Please find to follow the link to the Tracked Permit service:

Request environmental permit coordination for major projects - GOV.UK

This can be used if a proposal:

- relates to a major infrastructure project or complex housing development
- requires multiple environmental permits or licences, or a combination of both

[redacted]

From: FS, Yorkshire and North East Area <yne@forestrycommission.gov.uk>
Sent: 16 June 2026 21:55
To: East Coast Hydrogen Pipeline – Humber
Subject: Re: EN0710008 East Coast Hydrogen Humber Pipeline EIA Notification

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 East Coast Hydrogen Humber Pipleline Environmental Impact Assessment (EIA) Scoping Report (Volume 1 - Main Text), there are six parcels of ancient woodland within 500m of the Scoping Boundary, with the closest located 12m north of the Scoping Boundary, 1 veteran tree on the periphery of the scoping boundary, and 13 veteran trees within 500m of the Scoping Boundary, with the closest being 50m from the Scoping Boundary. The stated Routeing Objective for these irreplaceable habitats is "Seek to Avoid", which the Forestry Commission supports.

Section 4.3.4 of the Scoping Report states that where it is not possible to avoid these features, any loss of individual trees will be compensated. It is Government Policy to refuse development that results in the loss or deterioration of irreplaceable habitats, unless "there are wholly exceptional reasons, and a suitable compensation strategy exists". It is not possible to fully compensate for the loss of irreplaceable habitat.

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 the irreplaceable habitats, taking into account direct, indirect and cumulative effects arising during construction, operation, maintenance and decommission.

Where buffers are proposed, the standing advice indicates they should contribute to wider ecological networks and form part of the green infrastructure of the area, comprising semi-natural habitats such as woodland or a mix of scrub, grassland, heathland and wetland.

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.

Priority Habitat
The Scoping Report identifies multiple parcels of deciduous woodland which appear in The Priority Habitat Inventory. Lowland Mixed Deciduous Woodland is a habitat of principal importance under Section 41 of the Natural Environment and Rural Communities Act 2006. Public authorities must, in exercising their functions, have regard to the purpose of conserving and enhancing biodiversity under Section 40 of that Act.

Fragmentation is one of the greatest threats to mixed deciduous woodland. Woodlands can suffer loss or deterioration from nearby development through loss of connectivity, damage to soils, roots and vegetation and changes to drainage and air pollution from an increase in traffic or dust, particularly during the construction phase of a development. Loss of habitat connectivity is a particular concern.

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.

Woodland Loss, Tree Canopy and Compensatory Woodland Creation
The Scoping Report acknowledges that where it is not reasonably practicable to retain valued habitats in situ, habitat loss or severance will be mitigated for and these areas will be replanted and enhanced using appropriate species/mix as soon as reasonably practicable.

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 woodland 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 woodland/tree canopy loss and contribute positively to local woodland networks and landscape-scale connectivity.

Conclusion

The Forestry Commission advises that the Environmental Statement should clearly demonstrate how the mitigation hierarchy has been applied, with avoidance of impacts to ancient woodland, ancient trees and veteran trees, and priority woodland habitats protected through route selection and design.

Where impacts cannot be avoided, the assessment should provide robust evidence that direct, indirect and cumulative effects during construction, operation, maintenance and decommissioning have been identified and reduced as far as possible, supported by appropriate mitigation, buffering and habitat enhancement measures.

Particular attention should be given to avoiding deterioration of irreplaceable habitats and maintaining or strengthening woodland connectivity across the wider landscape.

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

With thanks,

Dan Brown
Local Partnership Advisor

Yorkshire and North East Area
Foss House, King's Pool
1-2 Peasholme Green
York
YO1 7PX

Tel [redacted]

From: East Coast Hydrogen Pipeline – Humber <eastcoasthydrogenhumber@planninginspectorate.gov.uk>
Sent: 19 May 2026 15:09
Subject: EN0710008 East Coast Hydrogen Humber Pipeline EIA Notification

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Dear Sir/Madam

Please see attached correspondence on the proposed East Coast Hydrogen Humber 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.

[redacted]

From: FPL - Conx Request <ConnectionRequest@fulcrum.co.uk>
Sent: 19 May 2026 16:41
To: East Coast Hydrogen Pipeline – Humber
Subject: RE: EN0710008 East Coast Hydrogen Humber Pipeline EIA Notification

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,

FULCRUM

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

Tell us how we're doing:
We'd really appreciate feedback on your experience with us today. So, please tell us how we're doing by emailing feedb

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From: East Coast Hydrogen Pipeline – Humber <eastcoasthydrogenhumber@planninginspectorate.gov.uk>
Sent: 19 May 2026 15:10
Subject: EN0710008 East Coast Hydrogen Humber Pipeline EIA Notification

Dear Sir/Madam

Health and Safety Executive

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: eastcoasthydrogenhumber@planninginspectorate.gov.uk

Dear Mr Joseph Jones (PINS)

Date: 29 May 2026

PROPOSED EAST COAST HYDROGEN HUMBER PIPELINE (the project)
PROPOSAL BY NORTHERN GAS NETWORKS (the applicant)
INFRASTRUCTURE PLANNING (ENVIROMENTAL IMPACT ASSESSMENT) REGULATIONS 2017 (as amended) REGULATIONS 10 and 11

Thank you for your letter of 19 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?

According to HSE's records, the onshore components of the redline boundary of the proposed East Coast Hydrogen Humber Pipeline components [ref. Figure 1.2: The Scoping Boundary, East Coast Hydrogen Humber Pipeline, Date 13/05/2026, Rev P01, from "Scoping Report Figures submitted to the Secretary of State on 18 May 2026" EN0710008] cross the Consultation Zones of several Major Accident Hazard (MAH) sites, associated with the following operators:

HSE Reference	Operator	Address	Postcode
H0142	Ineos Acetyls UK Ltd	Saltend Chemicals Park, Hull	HU12 8DS
H0326	Croda Europe Ltd	Rawcliffe Bridge, Goole, North Humberside	DN14 8PN
H0560	Sandtoft Roof Tiles Ltd	Tile Works, Broomfleet, Brough, North Humberside	HU15 1RT
H3009	Air Products (BR) Ltd	Salt End Lane, Hedon, Hull	HU12 8PP
H4281	Exolum Pipeline System Ltd	Papermill Road, Rawcliffe Bridge, Goole	DN14 8PF
H4360	INEOS Manufacturing (Hull) Ltd	Saltend, Hull	HU12 8DS
H4414	Tradebe Solvent Recycling Ltd	Weeland Road, Knottingley, West Yorkshire	WF11 8DZ
H4719	Saltend Chemicals Park Ltd	Saltend Chemicals Park, Saltend Lane, 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 reference	Transco reference	Pipeline operator	Pipeline name
12732	2748	Northern Gas Networks	Saltend / Paull
14134	2760	National Gas	29 Feeder Ganstead to Asselby pipeline
4032673	2784	National Gas	Asselby/Pannal (Ref:2784)
4490502	2784	Northern Gas Networks	Plaxton Bridge Biomethane
4519206	1952	Northern Gas Networks	Lambkin Hill / Knottingley (Part Barwick/Knott.)
7701	1953	Northern Gas Networks	Knottingley / Chapel Haddlesley
7702	1954	Northern Gas Networks	Knottingley / Carcroft
7709	1961	Northern Gas Networks	Asselby / Harswell
7719	1971	Northern Gas Networks	Burton Agnes (West) / Wawne
7720	1972	Northern Gas Networks	Wawne / Ganstead
7721	1973	Northern Gas Networks	Beverley / Wawne
7722	1974	Northern Gas Networks	Bankside / Saltend
7723	1975	Northern Gas Networks	Bankside / Wawne
7728	1980	National Gas	6 Feeder Paull / Saltend
7738	1990	National Gas	7 Feeder Cawood / Eastoft
7739	1991	National Gas	7 Feeder Asselby / Drax (Extra River Crossing)
8393	2670	Northern Gas Networks	Chapel Haddlesey / Eggborough Glass
8422	2702	Northern Gas Networks	Wawne / Elloughton
9669	N/A	Ineos Manufacturing (Hull) Limited	Teesside to Saltend Ethylene Pipeline

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.

Would Hazardous Substances Consent be needed?

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 following 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 there are no HSE licenced explosives sites in the vicinity of the proposed development.

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

[redacted]

Cathy Williams
CEMHD4 NSIP Consultation Team

Privacy Notice details

English
Privacy information
HSE staff will process your data as part of our work primarily for the purpose of inspections and investigations, interventions and assessments in support of law enforcement.
Please see https://www.hse.gov.uk/help/privacy.htm for more details.

Historic England

Direct Dial: 01904 601858

Our ref: PL00801704

PINS ref.: EN0710008

By email

Date: 4 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 East Coast Hydrogen Humber 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 19 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:

- EN0710008 – East Coast Hydrogen Humber Pipeline Environmental Impact Assessment (EIA) Scoping Report (Volume I – Main Text)
- EN0710008 – 000005 East Coast Hydrogen Humber Pipeline – Volume II Figures

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 investigation of current natural gas pipelines and 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 and 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 of 1km for designated heritage, 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.

In the Scoping Report further consultation with stakeholders after receipt of the scoping opinion is stated in chapter 6.3.2, and 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).

The scheduled monuments of Castle Hill Moated Site (NHLE 1017455), Scurff Hall Moated Site (NHLE 1017485), the Romano-British Villa at Cockle Pits near Brantingham (NHLE 1014736), as well as the Grade II* listed buildings of The Red House (NHLE 1148401), St Paul's Church (NHLE 1295734) are situated on the draft order limit boundary and need particular consideration in regard to avoiding an impact on the significance of the monuments.

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 4.3.4 of the Scoping Report provides a wide range of 'Environmental and social design aims'. However, 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.

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

Yours sincerely

Martina Tenzer
Inspector of Ancient Monuments
E-mail: [redacted]@historicengland.org.uk

[redacted]

From: Majors Planning <Majors.Planning@kirklees.gov.uk>
Sent: 22 May 2026 15:01
To: East Coast Hydrogen Pipeline – Humber
Subject: FW: EN0710008 East Coast Hydrogen Humber Pipeline EIA Notification
Attachments: EN0710008 - East Coast Hydrogen Humber Pipeline Statuatory Consultaiton and Regulation 11 Notification.pdf

Categories: EST

Dear Mr Jones,

I write in response to the below email and attached letter on behalf of Kirklees Council.

I can confirm that Kirklees Council has no comments to make on the matter.

Yours sincerely,

Nick Hirst, MRTPI
Team Leader – Development Management (Major Developments)

Planning and Development Service
Place Directorate
PO Box 1720, Huddersfield, HD1 9EL
Tel: [redacted]
Website: www.kirklees.gov.uk

From: East Coast Hydrogen Pipeline – Humber <eastcoasthydrogenhumber@planninginspectorate.gov.uk>
Sent: 19 May 2026 15:11
Subject: EN0710008 East Coast Hydrogen Humber Pipeline EIA Notification

FAO Head of Planning

Dear Sir/Madam

Please see attached correspondence on the proposed East Coast Hydrogen Humber Pipeline.

[redacted]

From: [redacted]@leeds.gov.uk>
Sent: 12 June 2026 14:28
To: East Coast Hydrogen Pipeline – Humber
Subject: Reference EN0710008 East Coast Hydrogen Humber Pipeline

Categories: EST

Good Afternoon,

Further to the letter sent to the Council on 19th May 2026, Leeds City Council would offer the following comments in its role as local planning authority.

The Council recognises the strategic importance of hydrogen infrastructure in supporting decarbonisation - enabling the transition to a low-carbon economy across Yorkshire and the Humber. As such, the local planning authority would be supportive in principle of the proposal and the delivery of infrastructure that contributes to achieving net zero, subject to detailed assessment of environmental, spatial and cumulative impacts.

The proposed pipeline extends approximately 110 km from Saltend (East Riding of Yorkshire) to Byram (near Knottingley), with associated spurs and above-ground infrastructure. The main route is not currently identified as passing through the Leeds district and the proximity of the scheme terminus at Byram is some distance from our boundary and therefore we can't see that there are any direct cross-boundary environmental impacts, infrastructure interactions, or implications on safeguarding existing allocations for growth. However, we would expect that this should be demonstrated through the EIA, and if any cross-boundary impacts are identified that they are appropriately assessed and mitigated.

As already mentioned, the Council acknowledges the potential benefits of the scheme in supporting decarbonisation and facilitating the development of future hydrogen supply chains across the region. In this context, the applicant is encouraged to explore opportunities for connections to Leeds and to consider how the scheme could contribute more broadly to supporting sustainable economic growth within Leeds and the wider city region and we'd welcome future conversation with them as and when future opportunities are explored to broaden infrastructure connections.

Regards,

Ryan Platten BA (Hons) MPlan MRTPI
Team Leader | North East Area Team | Development Management
Planning and Sustainable Development | City Development | Leeds City Council

Email: [redacted]@leeds.gov.uk
Website: www.leeds.gov.uk/planning

[redacted]

From: [redacted]@middlesbrough.gov.uk>
Sent: 08 June 2026 08:25
To: East Coast Hydrogen Pipeline – Humber
Subject: RE: EN0710008 East Coast Hydrogen Humber Pipeline EIA Notification

Categories: EST

This document was classified as: OFFICIAL

Good morning Joseph

Thank you for your email of 19th May consulting Middlesbrough Council on the above proposed development.

Having reviewed the submitted information, I can confirm that Middlesbrough Council has no comments to make.

Regards

Peter Wilson
Principal Planning Officer

Development Control
Middlesbrough Council
PO Box 500, Middlesbrough, TS1 9FT

E: [redacted]@middlesbrough.gov.uk | T: [redacted] | W: www.middlesbrough.gov.uk

From: East Coast Hydrogen Pipeline – Humber <eastcoasthydrogenhumber@planninginspectorate.gov.uk>
Sent: Tuesday, 19 May 2026 15:11
Subject: EN0710008 East Coast Hydrogen Humber Pipeline EIA Notification

The Coal Authority

200 Lichfield Lane
Mansfield
Nottinghamshire
NG18 4RG
T: 01623 637 119 (Planning Enquiries)
E: planningconsultation@coal.gov.uk
W: www.gov.uk/coalauthority

For the attention of: Mr J Jones – Environmental Advisor
The Planning Inspectorate

[By email: eastcoasthydrogenhumber@planninginspectorate.gov.uk]

Our ref: ENSIP-53

9th June 2026

Dear Mr Jones

Re: EN0710008 – East Coast Hydrogen Humber Pipeline

Thank you for your notification of the 19th May 2026 seeking the views of the Coal Authority on the above.

The Coal Authority, trading as the Mining Remediation Authority, is a non-departmental public body sponsored by the Department for Energy Security and Net Zero. As a statutory consultee, the Coal Authority has a duty to respond to planning applications and development plans in order to protect the public and the environment in mining areas.

The Planning team at the Coal Authority have reviewed the coal mining data we hold against the East Coast Hydrogen Humber Pipeline project and associated works.

I can confirm that based on the area of the route proposed the project does not lie in areas where our records indicate that coal mining features at surface or shallow depth are present that may pose a risk to surface stability. On this basis we have no detailed comments to make on this Scoping Opinion.

If you would like to discuss this matter further please do not hesitate to contact me.

Yours sincerely

Melanie Lindsley

Melanie Lindsley *BA (Hons), DipEH, DipURP, MA, PGCertUD, PGCertSP, MRTPI*
Principal Planning & Development Manager

Disclaimer

The above consultation response is provided by the Coal Authority as a statutory consultee and is based upon the latest available data and the electronic consultation records held by the Coal Authority since 1 April 2013. The comments made are also based on the information provided to the Coal Authority or information that has been published for consultation purposes in relation to this specific project. The views and conclusions contained in this response may be subject to review and amendment by the Coal Authority if additional or new data/information (such as a revised Coal Mining Risk Assessment) is provided by the applicant/developer for consultation purposes.

+44 (0) 1926 65 3000
nationalgas.com

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

Date: 16th 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 Northern Gas Networks (the Applicant) for an Order granting Development Consent for the East Coast Hydrogen Humber Pipeline (the Proposed Development)

I refer to your letter dated 19/05/2026 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 – FM06 – Paul to Saltend
- Feeder Main – FM29 – Ganstead to Asselby
- Feeder Main – FM29 – Asselby to Pannal
- Feeder Main – FM07 – Asselby to Drax
- Feeder Main – FM07 – South Duffield to Asselby
- Feeder Main – FM07 – Drax to Rawcliffe
- NGT Freehold – NYK279782
- NGT Leasehold – YEA41918
- NGT Leasehold – YEA57339
- 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,

Hayley Steele
DCO Liaison Officer

National Grid House
Warwick Technology Park
Gallows Hill, Warwick
CV34 6DA

Tiffany Bate
Lead Development Liaison Officer
[redacted]@nationalgrid.com
[redacted]

Rachel Hagan
Development Liaison Support Officer
[redacted]@nationalgrid.com
[redacted]

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

SUBMITTED ELECTRONICALLY:
eastcoasthydrogenhumber@planninginspectorate.gov.uk

16 June 2026

Dear Sir/Madam

RE: APPLICATION BY NORTHERN GAS NETWORKS (THE APPLICANT) FOR AN ORDER GRANTING DEVELOPMENT CONSENT FOR THE EAST COAST HYDROGEN HUMBER PIPELINE (THE PROPOSED DEVELOPMENT)

SCOPING CONSULTATION RESPONSE

We refer to your letter dated 19th 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

- Drax 132kV Substation
- Drax 400kV Substation
- Camblesforth 66kV Substation
- Ferrybridge A 275kV Substation
- Ferrybridge B 132kV Substation
- Ferrybridge C 275kV Substation
- Ferrybridge C 400kV Substation
- Eggborough 400kV Substation

Associated overhead and underground apparatus including cables

Overhead Lines

YYW 275kV ROUTE CREYKE BECK - SALT END NORTH

	CREYKE BECK – HEDON
4ZQ 400kV ROUTE	CREYKE BECK - HUMBER REFINERY - KEADBY CREYKE BECK - KEADBY – KILLINGHOME
4ZR 400kV ROUTE	CREYKE BECK - THORNTON 1 CREYKE BECK - THORNTON 2
4VC 400kV ROUTE	DRAX - THORNTON 1 DRAX - THORNTON 2
4VH 400kV ROUTE	DRAX - KEADBY - THORPE MARSH DRAX - THORPE MARSH
4VJ 400kV ROUTE	DRAX - EGGBOROUGH 1 DRAX - EGGBOROUGH 2
4YS 400kV ROUTE	EGGBOROUGH - MONK FRYSTON 1 EGGBOROUGH - MONK FRYSTON 2
4YT 400kV ROUTE	EGGBOROUGH - NEEPSEND - STOCKSBRIDGE EGGBOROUGH - THORPE MARSH
4YQ 400kV ROUTE	EGGBOROUGH - FERRYBRIDGE 'C' EGGBOROUGH – ROCHDALE
4YR 400kV ROUTE	EGGBOROUGH - FERRYBRIDGE 'C' EGGBOROUGH – ROCHDALE
4ZT 257kV ROUTE	FERRYBRIDGE 'C' - FERRYBRIDGE 'B' - MONK FRYSTON FERRYBRIDGE 'C' - MONK FRYSTON
4ZS 257kV ROUTE	FERRYBRIDGE 'C' - FERRYBRIDGE 'B' - SKELTON GRANGE 1 FERRYBRIDGE 'C' - SKELTON GRANGE 2

We enclose a plan 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/.

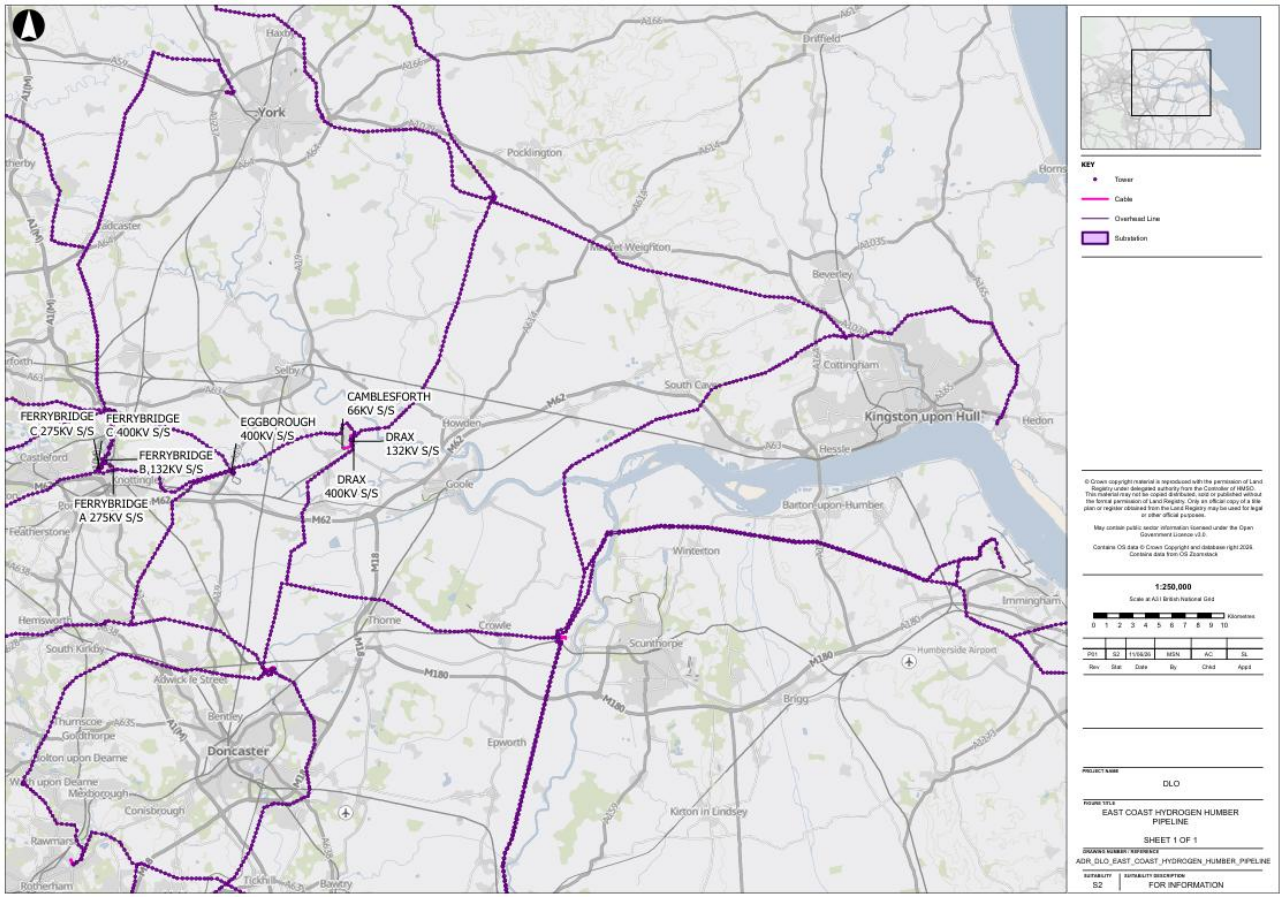


Figure 1: Overview of NGET Assets in proposed development area

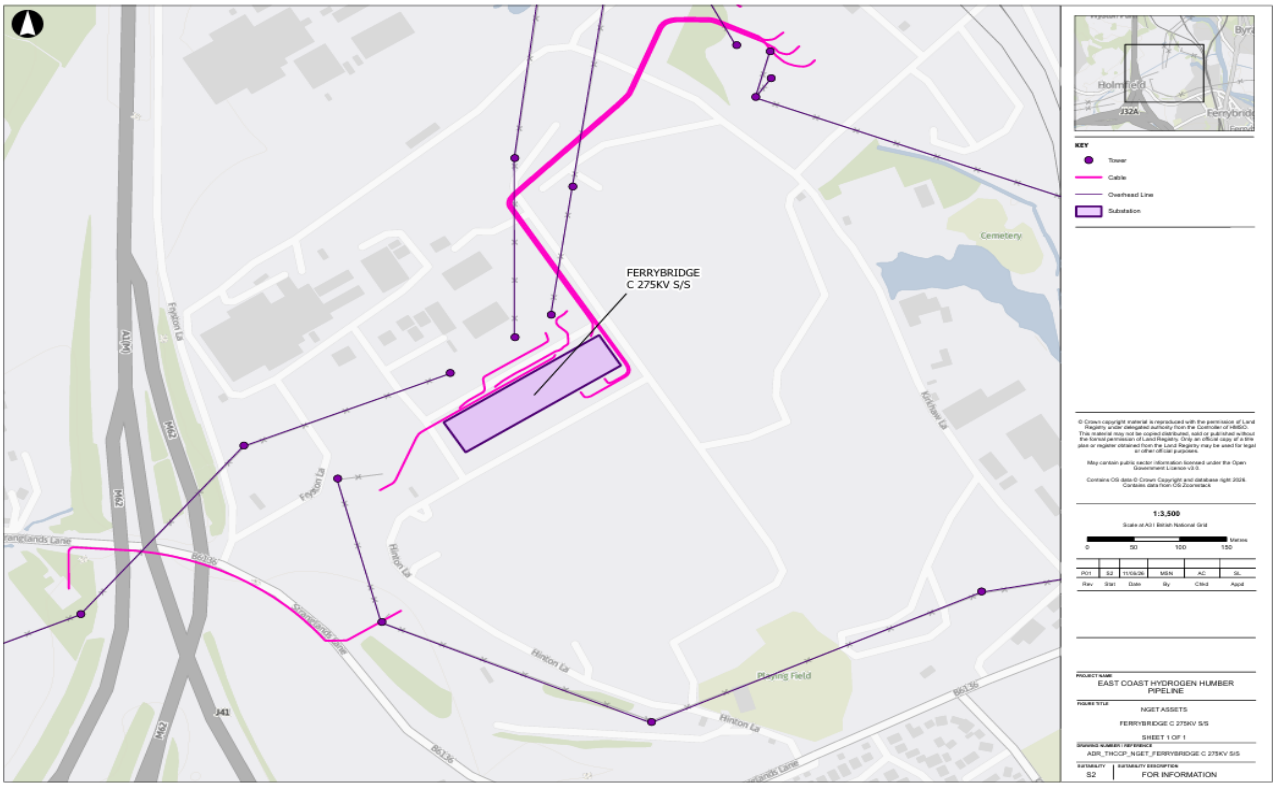


Figure 2: NGET's Ferrybridge C 275KV Substation

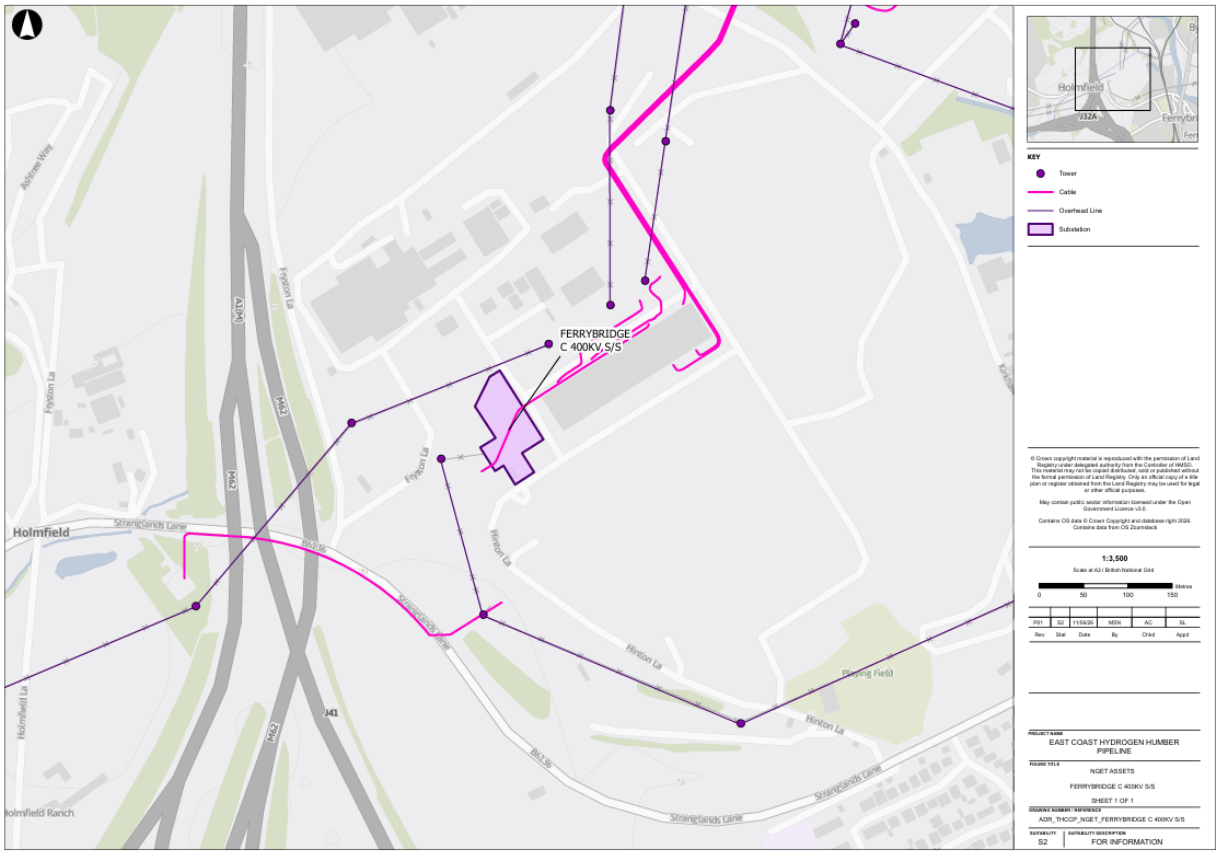


Figure 3: NGET's Ferrybridge C 400KV Substation

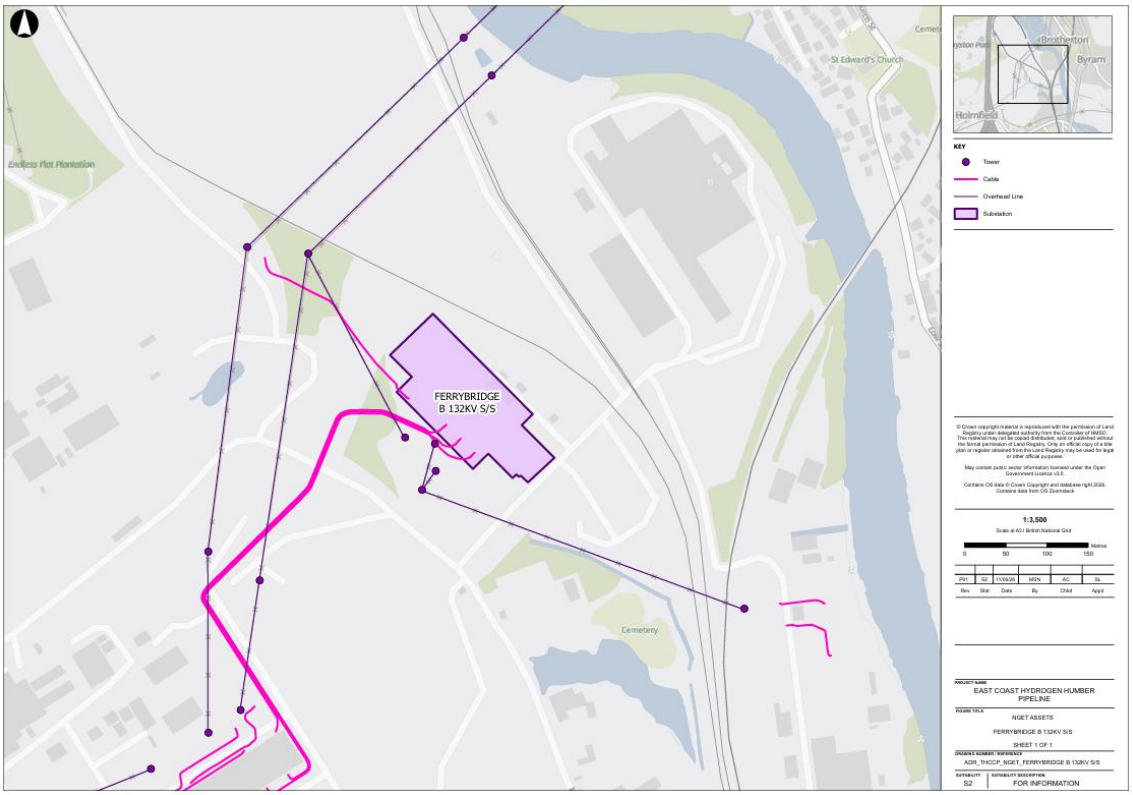


Figure 4: NGET's Ferrybridge B 132KV Substation

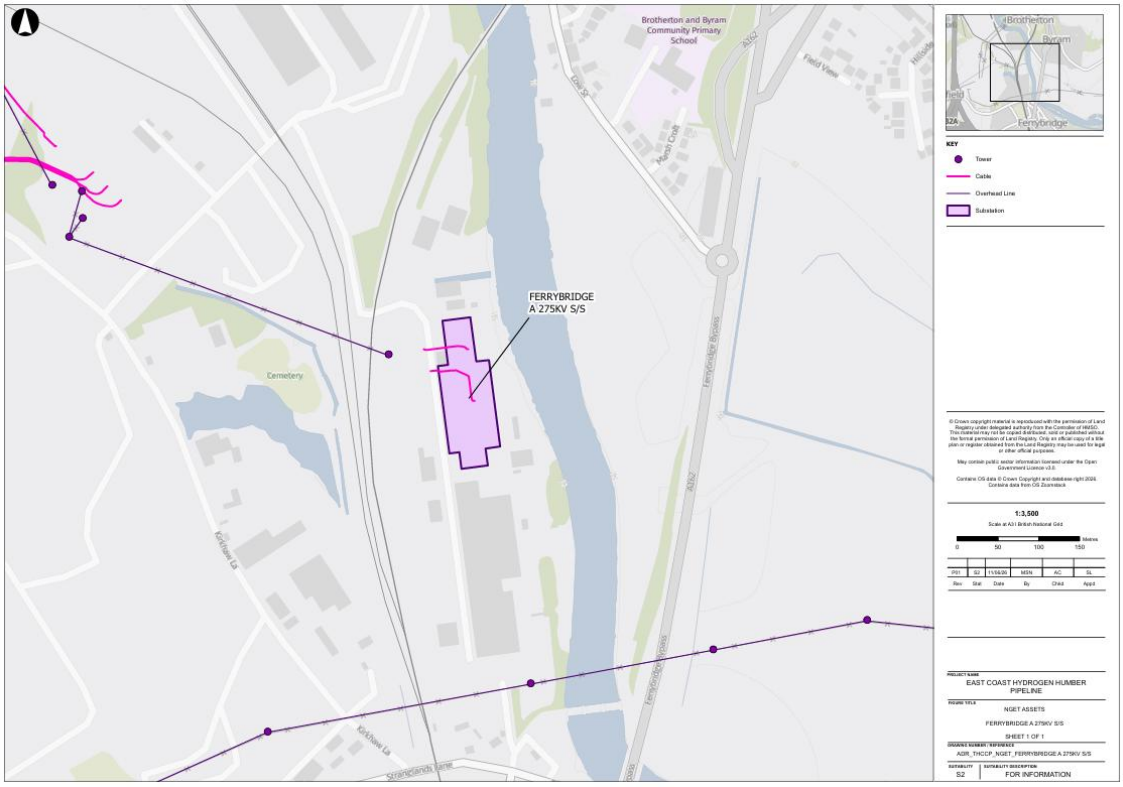


Figure 5: NGET's Ferrybridge A 275KV Substation

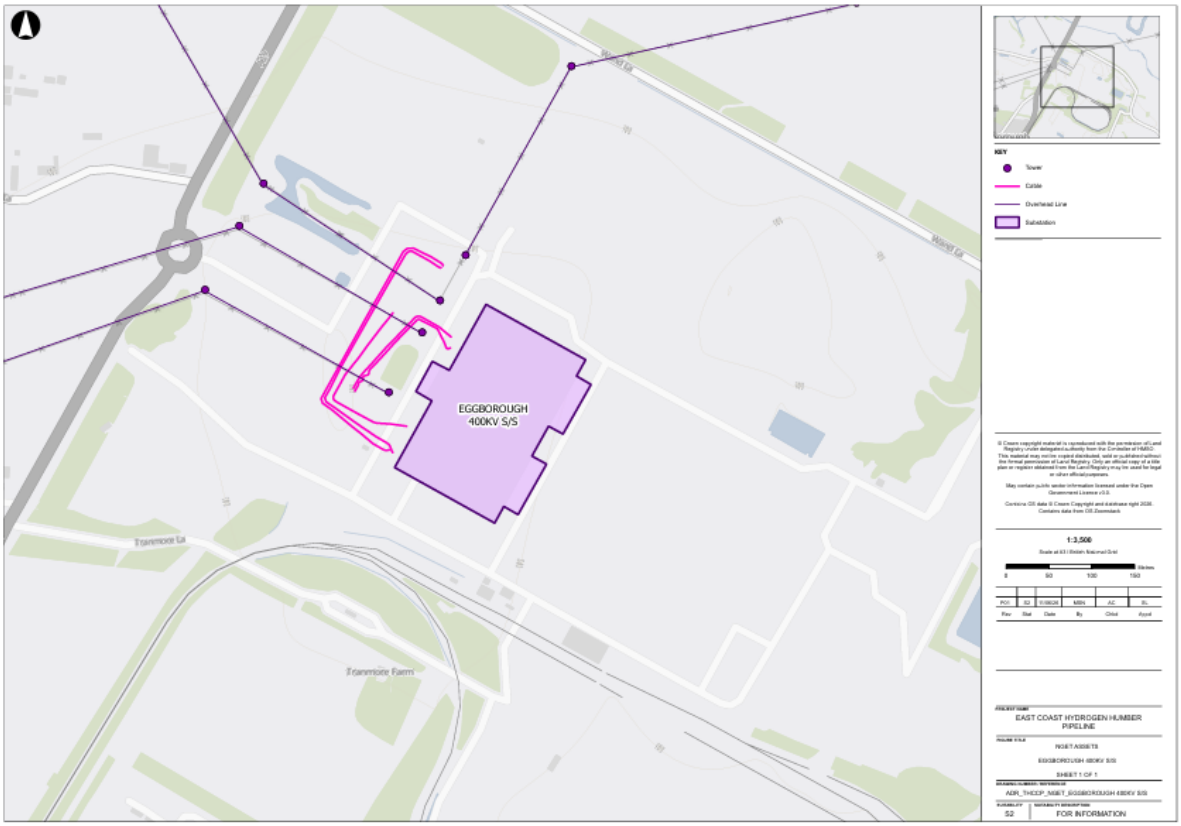


Figure 6: NGET's Eggborough 400KV Substation

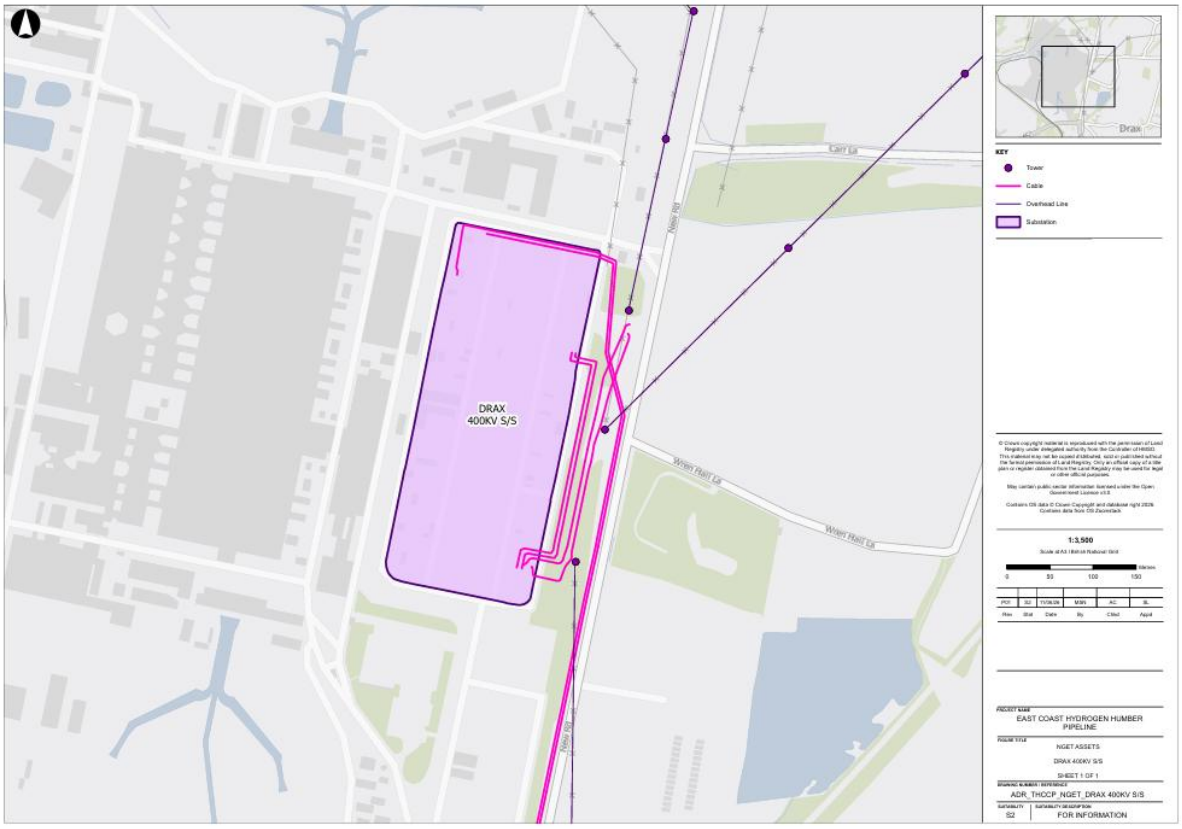


Figure 7: NGET's DRAX 400KV Substation

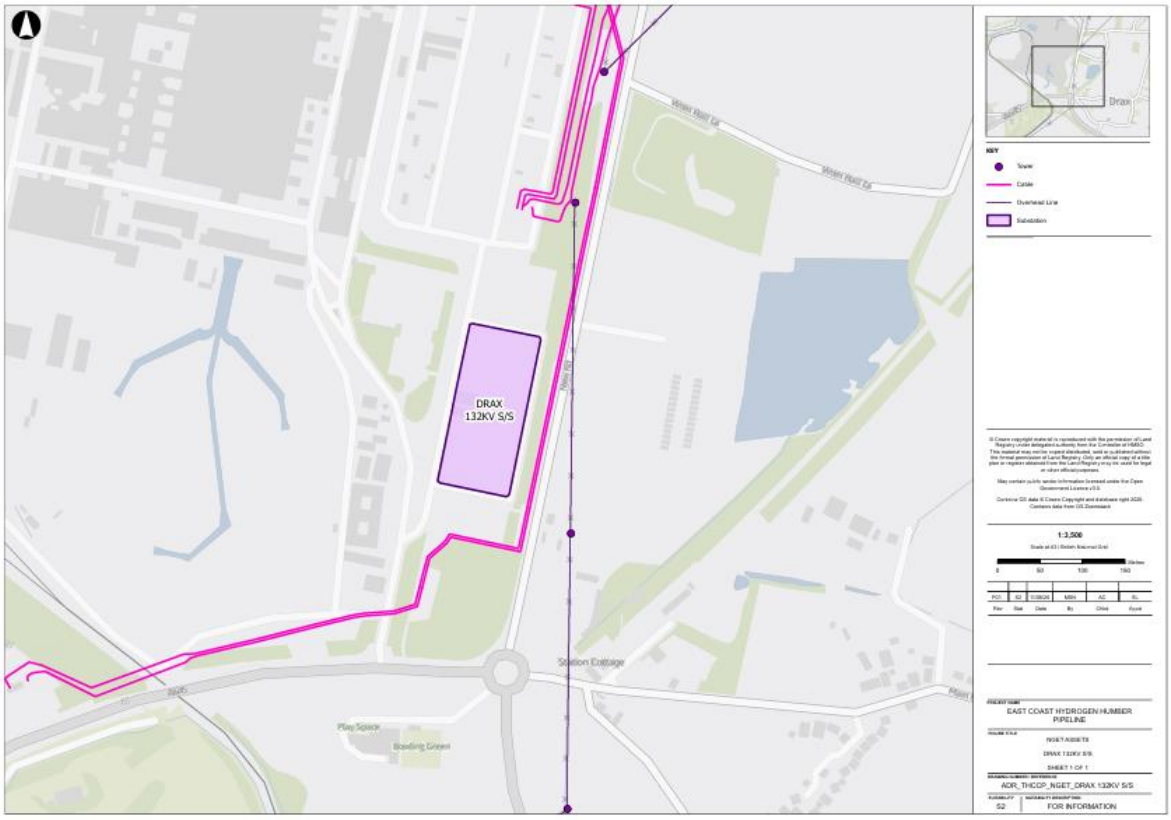


Figure 8: NGET's DRAX 132KV Substation

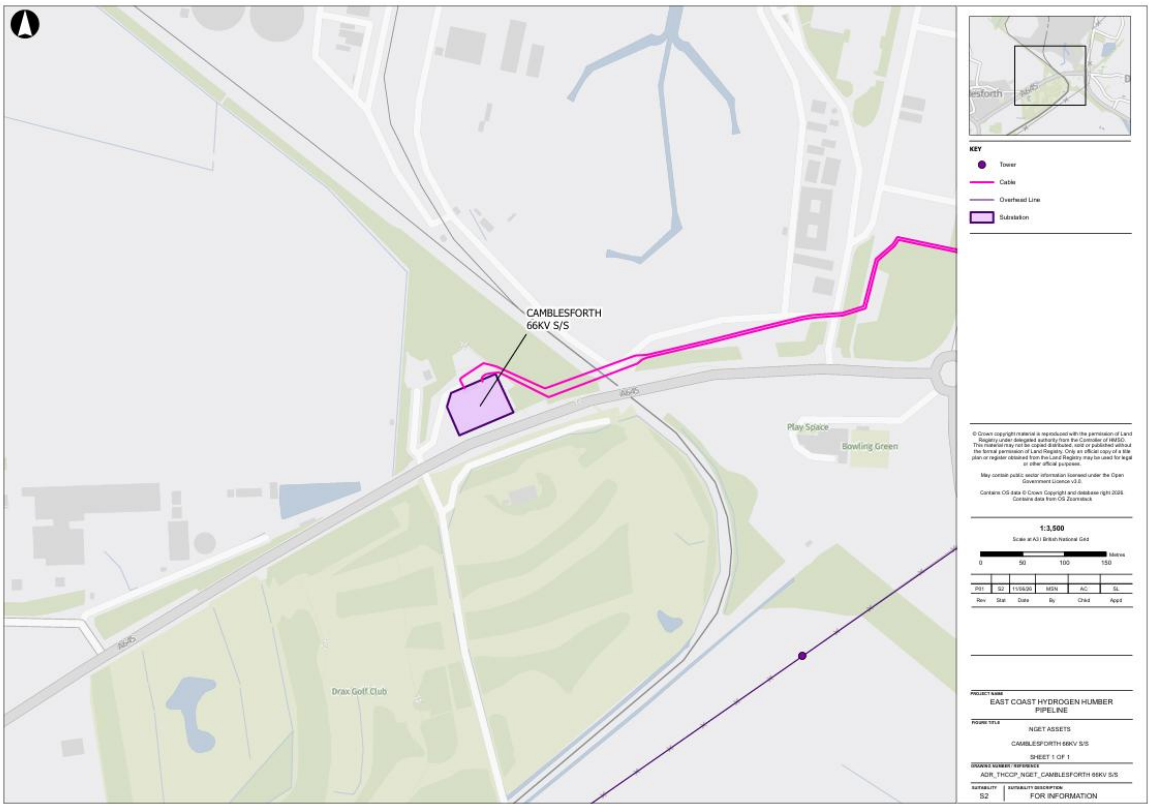


Figure 9: NGET's Camblesforth 66KV Substation

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

North Humber to High Marnham

NGET are proposing to build a new high voltage electricity transmission line and associated works between a new substation north of Hull at Creyke Beck in the East Riding of Yorkshire and a new substation at High Marnham in Nottinghamshire. Details of the infrastructure project can be found on the NGET North Humber to High Marnham website: North Humber to High Marnham | National Grid

The project comprises approximately 90 km of new 400 kV overhead line, together with associated substations, sealing end compounds, access routes and ancillary infrastructure required to facilitate the connection. The reinforcement forms part of NGET's wider programme of network upgrades to increase transmission capacity and support the connection of new low-carbon generation.

The project has progressed through route development, environmental assessment and stakeholder engagement, with ongoing design refinement informed by consultation feedback and technical surveys and is continuing to undertake detailed environmental assessment and consenting activities.

Key considerations for the assessment include potential effects on landscape and visual amenity, ecology, cultural heritage, agricultural land, public rights of way, traffic and access, as well as cumulative effects arising from other developments within the study area. Appropriate mitigation measures will be developed through the design process to avoid, reduce and offset potential impacts where necessary.

The NHHM project has a current construction timetable of 2028 to 2031 with re-instatement works to continue until 2033. From the information available it would appear that there is high potential for temporary or permanent interactions between both projects at certain locations with the proposed pipeline potentially crossing underneath the North Humber to High Marnham 400kV overhead which must be considered in the design of the proposed project.

Eastern Green Link 2

EGL2 is a 505km electricity superhighway which will enable the transfer of power from Scotland to England (and vice versa) via a subsea cable. This two-gigawatt high voltage direct current (HVDC) cable is connecting Peterhead in Aberdeenshire and Drax in North Yorkshire and once operational, will carry enough electricity to power two million homes.

EGL2 will scale up the UK's capacity to transport home-produced clean energy, predominantly from offshore wind, from where it is generated to where there is demand. By doing so it will increase the security, resilience, and stability of the UK's transmission network.

At an investment of over £4bn, EGL2 is the largest ever single investment in the UK transmission system and will play a critical role in delivering the UK and Scottish governments' clean power and energy security targets, supporting thousands of jobs across the country and boosting local and national economies.

This project is a major step forward in delivering the reliability and security of the UK's home-grown energy supply and will provide greater flexibility to balance electricity demand and supply, enhance energy resilience, and help us to future-proof the network against rising energy needs.

EGL2 is being delivered as a joint venture between SSEN Transmission and National Grid Electricity Transmission (NGET). NGET owns and manages the electricity transmission network in England and Wales, and SSEN Transmission does the same in the north of Scotland. The two connection points of EGL2 fall within these operating areas.

Following final approval from Ofgem in August 2024, construction for EGL2 is now underway and the project is due to be operational in 2029.

For EGL2 southern onshore works we are building:

- Approximately 436km of subsea cabling from Sandford Bay, Peterhead in Aberdeenshire to Fraisthorpe Sands, near Bridlington in the East Riding of Yorkshire
- Approximately 68km of underground cabling from Fraisthorpe to a converter station in Drax, North Yorkshire
- Wren Hall Converter Station in Drax
- Wider works:
- Peterhead Substation works – new bay in the existing substation
- Drax Substation works – new bay in the existing substation
- New 400kV cable system on the existing Drax to Eggborough Circuit
- New 400kV cable system southwards from Drax, terminating near Fenwick

Drax to Thornton

Drax to Thornton Overhead Line: We are proposing refurbishment to the overhead line which runs for 23km across the East Riding of Yorkshire and Selby District.

The refurbishment work will involve renewing and replacing some of the fixtures, fittings, and steelwork on the existing overhead line, including replacing the conductors (the wires), to ensure the local electricity supply is reliable for generations to come.

Eggborough to Thorpe Marsh

The Eggborough to Thorpe Marsh Reinforcement Project is a proposed 400 kV electricity transmission works designed to strengthen the electricity network between the former Eggborough Power Station site in North Yorkshire and Thorpe Marsh Substation in South Yorkshire.

The project will increase network capacity, improve resilience, and support the connection and transfer of low-carbon generation, energy storage and future electricity demand, contributing to the UK's net-zero objectives, reconductoring the overhead line (OHL) and replacing the existing underground cable at Eggborough (including associated cable sealing end modifications);

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 not withstanding any discussions taking place in relation to connections with electricity customer services.

Yours faithfully,

[redacted]

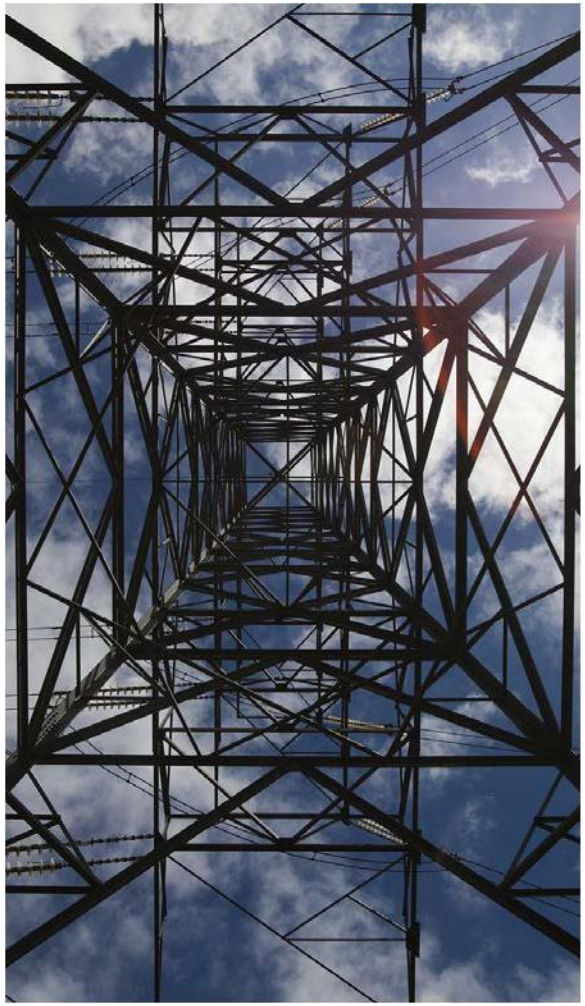
Tiffany Bate
Lead Development Liaison Officer
Customer Connections Site Solutions (CCSS)
Land, Planning and External Affairs (LPEA)

[redacted]

Rachel Hagan
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



Purpose and scope

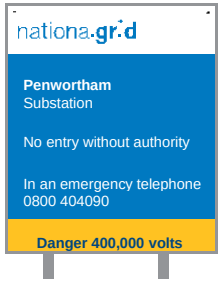
The purpose of this document is to give guidance and information to third parties who are proposing, scheduling or designing developments close to National Grid Electricity Transmission assets.

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.

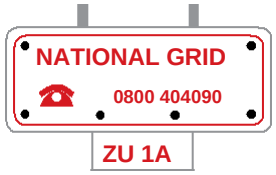
In the case of electrical assets, National Grid does not authorise or agree safe systems of work with developers and contractors. However, we will advise on issues such as electrical safety clearances and the location of towers and cables. We also work with developers to minimise the impact of any National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

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.

400kV

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

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

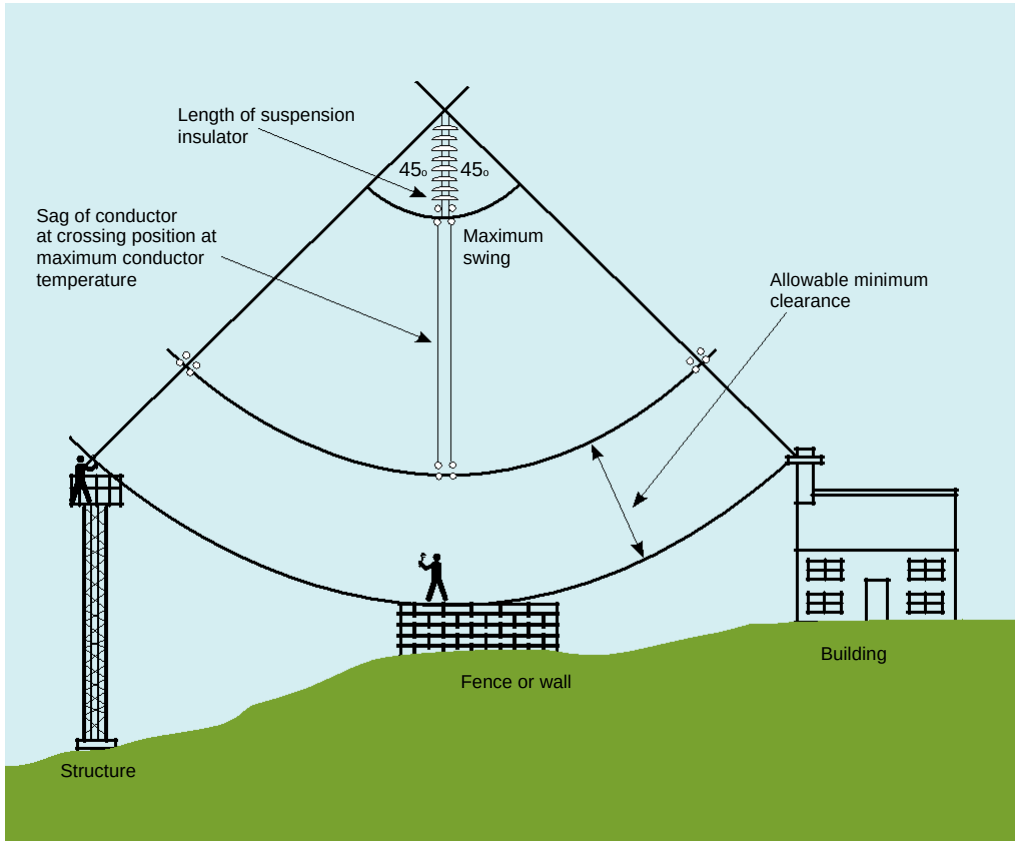
The clearance distances referred to in this section are specific to 400kV overhead lines. National Grid can advise on the distances required around different voltages i.e. 132kV and 275kV.

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 layed 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 seperation 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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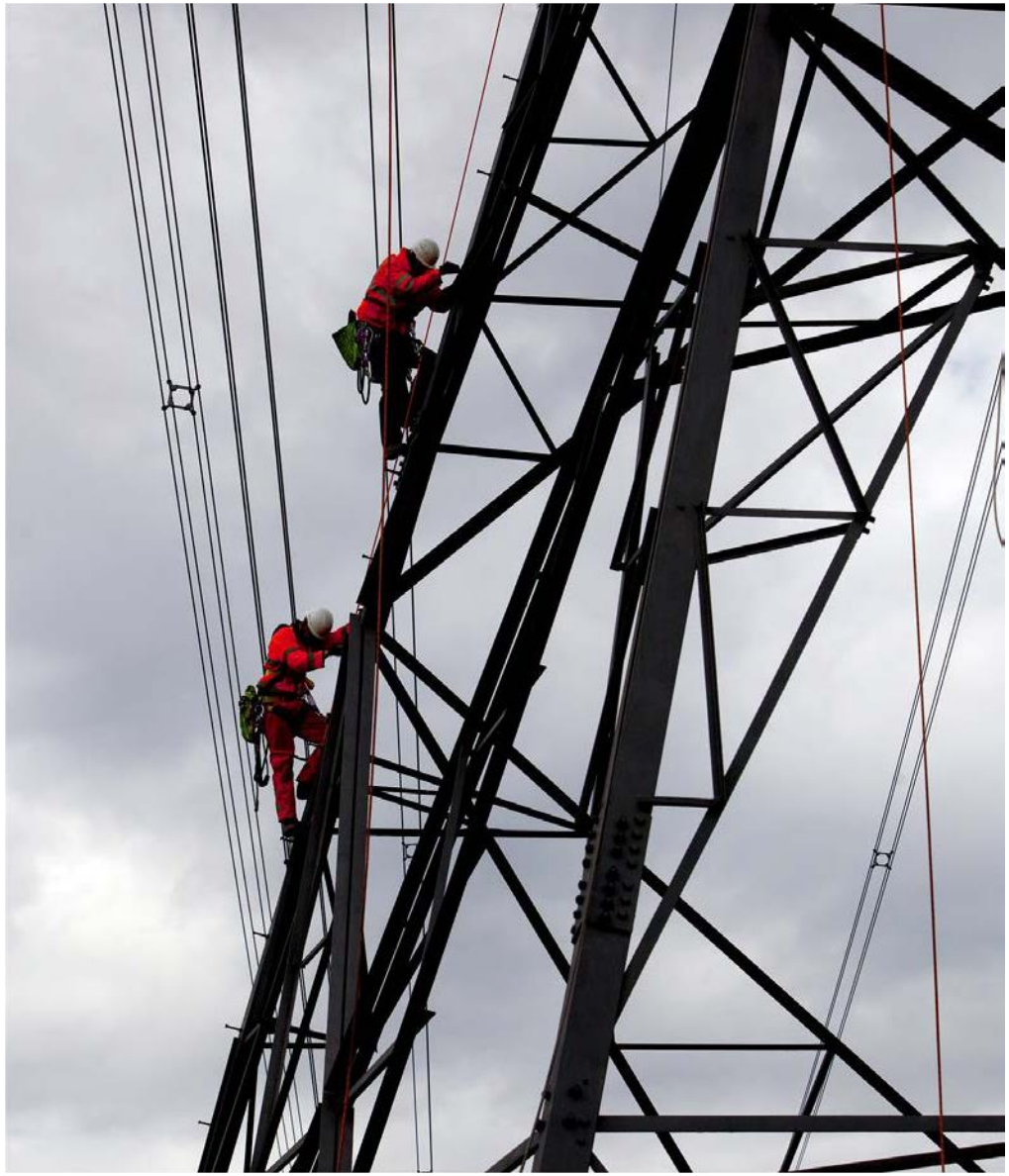

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Fires and firefighting

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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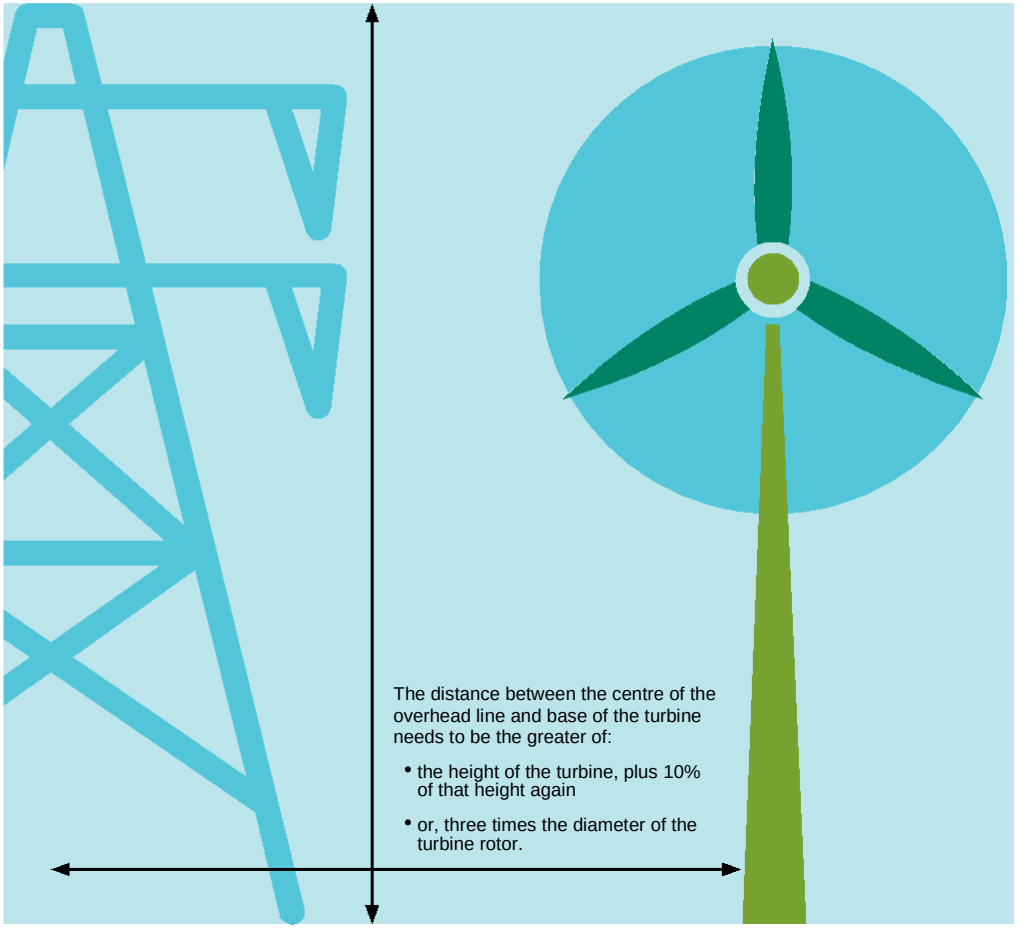
Diagram not to scale



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, 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.

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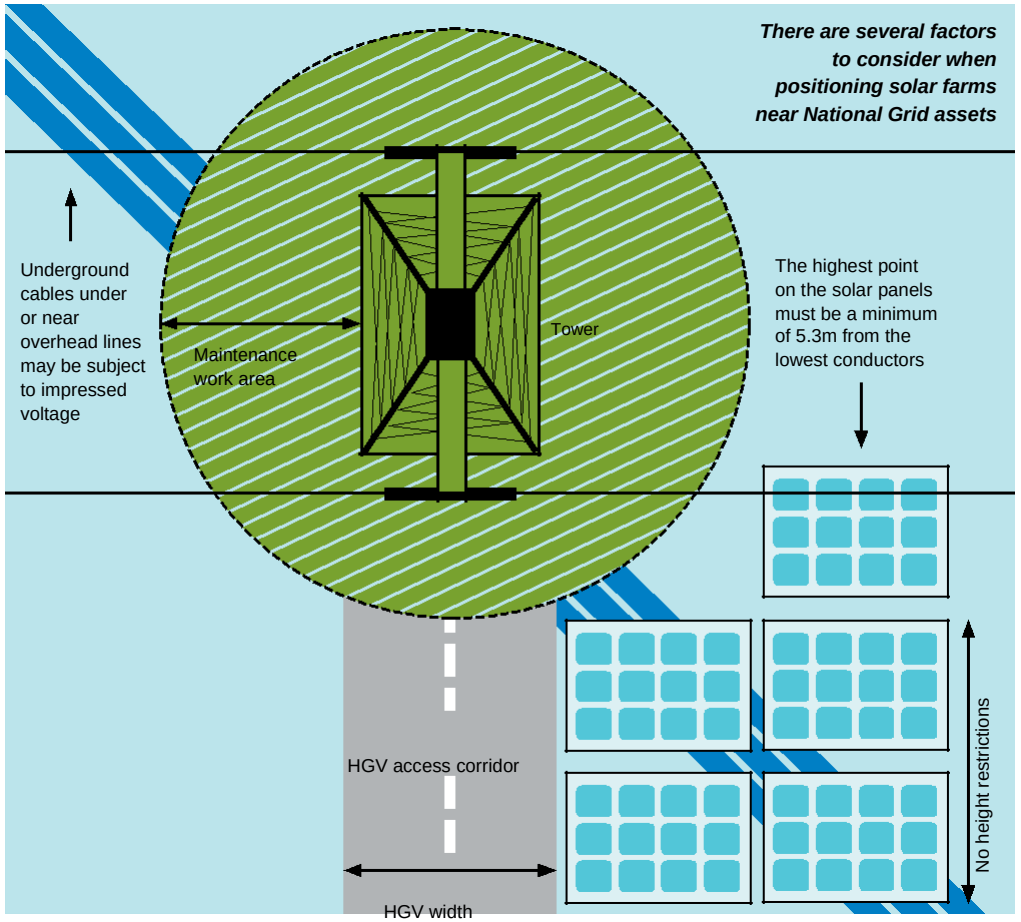


Asset protection agreements

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

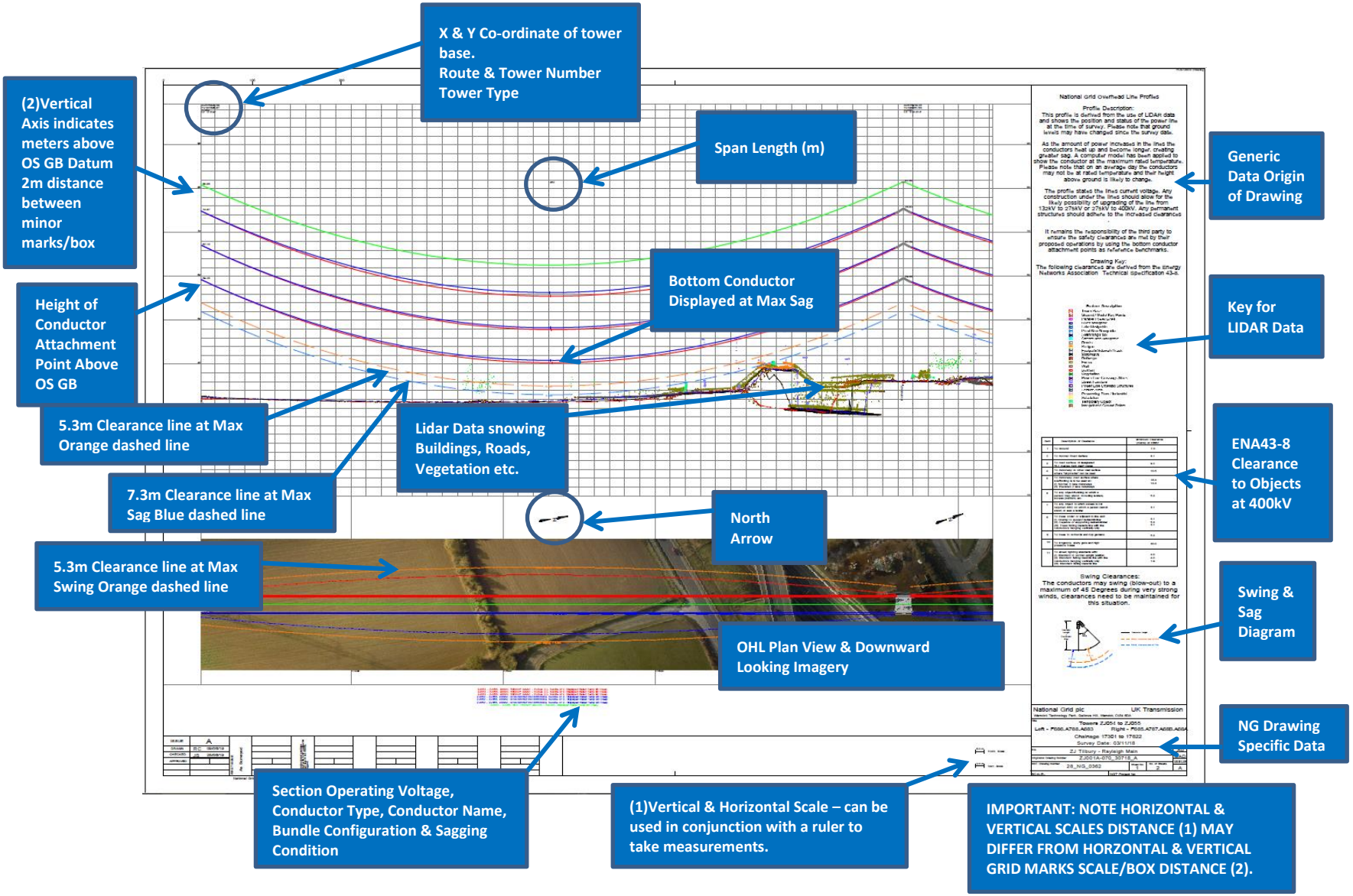
Email:
assetprotection@nationalgrid.com

Call Asset Protection on:
0800 0014282

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

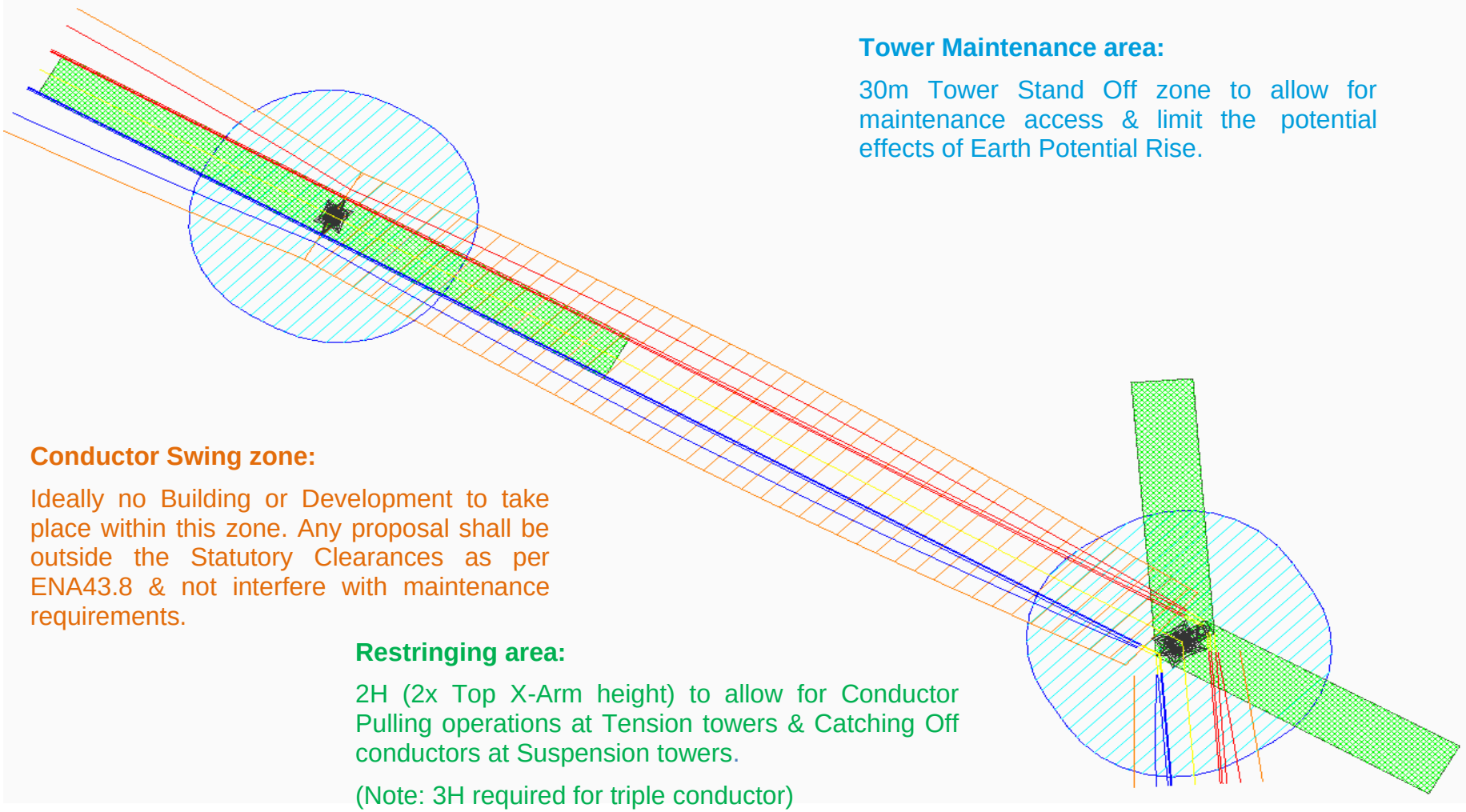
14 APPENDIX A

OHL Profile Drawing Guide



15 APPENDIX B

OHL Tower Stand Off & Reconductoring Area



Tower Maintenance area:

30m Tower Stand Off zone to allow for maintenance access & limit the potential effects of Earth Potential Rise.

Conductor Swing zone:

Ideally no Building or Development to take place within this zone. Any proposal shall be outside the Statutory Clearances as per ENA43.8 & not interfere with maintenance requirements.

Restringing area:

2H (2x Top X-Arm height) to allow for Conductor Pulling operations at Tension towers & Catching Off conductors at Suspension towers.

(Note: 3H required for triple conductor)

Our ref: NH/26/16359

Your ref: EN0710008

Rebecca Garrett
Planning and Development
National Highways
8 City Walk
Leeds
LS11 9AT

Direct Line: [redacted]

10 June 2026

FAO: eastcoasthydrogenhumber@planninginspectorate.gov.uk

Dear Sir/Madam,

East Coast Hydrogen Humber Pipeline

Thank you for consulting National Highways ("NH") for our comments on the Environmental Impact Assessment (EIA) Scoping Report, relating to the proposed development of the East Coast Hydrogen Humber Pipeline ("the Proposed Development").

The Project as set out within the Environmental Impact Assessment (EIA) Scoping Report will convey hydrogen from production and storage locations proposed by third parties in the Humber Region to a range of industrial consumers across Yorkshire and Humber, including potential connections to other third-party operated networks.

The Project consists of the construction (including repurposing) and operation of an approximately 110km (68 miles) underground high and intermediate pressure hydrogen pipeline, with the pipelines expected to range between 6 and 42 inches in diameter, between Saltend and Byram. It will include spurs off the main pipeline to connect with off-takers and will also include associated infrastructure (e.g. Above Ground Infrastructure such as Pressure Reduction Installations, Block Valve Stations and district governors) along the route of the pipeline.

It is noted from the interactive map on the developer's website (https://ngn-eastcoast.co.uk/humberside/) that the proposed pipeline route will, as currently proposed, cross the M62 three times, the A63 once and the A1033 once, a total of five crossings of the Strategic Road Network (SRN). Therefore, it creates the need for this review to ensure that the proposed development does not materially impact upon the capacity, operation and safety of the SRN. NH will need to understand:

- the likely traffic impact of the proposals upon the SRN, namely the M62, A63 and the A1033;

- whether there are any proposals to be advanced for the compulsory acquisition of land and/or rights belonging to NH;
- the potential for impact on NH drainage and structure assets;
- whether the Project will include development which undergrounds or oversails the SRN and in which locations; and
- whether any landscaping or fencing is proposed on or adjacent to the SRN.

Environmental Impact Assessment (EIA) Scoping Report

This Statutory Consultation on the Environmental Impact Assessment (EIA) Scoping Report, dated 18th May 2026, runs to 16 June 2026.

The submitted Environmental Impact Assessment (EIA) Scoping Report sets out that the Proposed Development comprises the installation of a pipeline that will convey hydrogen from production and storage locations proposed by third parties in the Humber region to a range of industrial consumers across Yorkshire and Humber, including potential connection(s) to other third-party hydrogen networks.

As currently proposed, the Proposed Development comprises the construction and operation of approximately 110km of new and potentially repurposed underground High Pressure (HP) (>7bar) and Intermediate Pressure (IP) (2>7bar) hydrogen pipelines between Saltend and Byram.

The Proposed Development is understood to include spurs off the main pipeline to connect with off-takers and will also include associated infrastructure (e.g. Above Ground Installations (AGI), Pressure Reduction Installations (PRI) and Block Valve Stations (BVS) along the route of the pipeline. The Proposed Development may also include necessary replacement of sections of natural gas pipeline within the Scoping Boundary. The Scoping Boundary in the context of its location in the UK is shown in Figure 1.1 of Volume II of the EIA, and the more localised Scoping Boundary is shown in Figure 1.2 (Pages 1 to 6) of Volume II of the EIA.

The route of the Proposed Development is advised by the EIA to cross land within the administrative boundaries of East Riding of Yorkshire Council (ERYC), Hull City Council (HCC), North Yorkshire Council (NYC) and Wakefield Council (WC). It also currently crosses the M62, A63 and the A1033 which form part of the SRN.

In addition to the Proposed Development, we understand from the EIA that the following may also be required/ proposed:

- other necessary replacement of sections of natural gas pipelines; and
- an ‘expansion’ network.

National Highways has reviewed the cabling route shown on the interactive map and in the Figures stated above, and we have provided the following advice on cabling corridor options.

Cabling Corridor Options

Any works carried out in, on, over, or under NH land will need to be agreed in writing between the undertaker and NH. NH does not accept compulsory acquisition of land or rights on the SRN or seek to impose or extinguish any restrictive covenants on the SRN. To avoid the Applicant incurring costs defending its position in examination, NH recommends that the Applicant seek to negotiate any land or rights required voluntarily with NH. Whilst it is acknowledged that the Applicant will seek to include such land/rights within the scope of its compulsory acquisition powers as a backstop, NH will require the Applicant to agree to a control over the exercise of those powers through its standard form protective provisions.

Any form of Horizontal Directional Drilling [HDD] or trenchless crossings under the SRN, would require a condition survey and regime of monitoring of any NH assets or structures that NH considers will be affected by the specified works, and will need to be reviewed and agreed in writing by NH, and a form of security put in place through the DCO to protect NH against any financial loss. These measures are appropriately covered in NH's standard form protective provisions.

Trenchless crossings under the SRN are to be in accordance with CD622 Managing Geotechnical risk https://www.standardsforhighways.co.uk/search/35a8bc82-3e08-4711-b03d-62a8cbd001e8

For any proposed works to the SRN, all drawings, specifications, and calculations would be required for review by NH and must meet current standards with the correct certification. The undertaker must comply with NH's road space booking procedures prior to and during the carrying out of the specified works. These measures are appropriately covered in NH's standard form protective provisions.

NH would note that the routing of cables/pipelines through or attached to existing overbridges or culverts is not likely to be acceptable to NH. The required submissions of information relating to any such routing requests should be confirmed by NH.

Construction Phase

We understand from the Environmental Impact Assessment (EIA) Scoping Report that before pipeline construction begins, surveys of the construction site/pipeline route would be completed including utilities, UXO checks and utility/ service diversions would be undertaken, as required. Where the preliminary risk assessments for ground contamination identify unacceptable risks, and remedial measures are advised, mitigation/ remediation of contamination would be undertaken prior to, or as part of, the enabling works phase.

The EIA Scoping Report sets out that the establishment of the working corridor would involve vegetation clearance where necessary, installation of temporary fencing or demarcation, stripping and storage of topsoil, and construction of access arrangements or haul routes where required. These activities would all be controlled by a Construction Environmental Management Plan (CEMP) with the Landscape and Ecological Management Plan (LEMP) specifying protection measures for habitats/ species including

vegetation to be retained and exclusion zones. National Highways welcomes these activities being controlled by a CEMP and LEMP.

The applicant is not currently anticipating that site wide reprofiling would be required as this will be avoided where possible and considered when establishing the preferred pipeline alignment, although it is likely that areas would require localised profiling to provide safe, level access within the draft Order Limits. The ES will describe the anticipated cut and fill volumes, spoil movements, minimum and, where relevant, maximum final ground heights and the associated impacts (e.g. construction traffic volumes).

Construction Compounds

As is normal practice with the construction of long pipelines, construction compounds/ laydown areas will be required along the pipeline working width to facilitate construction of the pipelines and AGIs. These areas will be used for temporary storage of materials, access to the pipeline working widths, to construct AGIs and BVS. The applicant advises that the final number and location of construction laydown areas / compounds will be identified within the ES that accompanies the Application.

In terms of the size, scale and location of construction compounds, these will depend upon multiple factors and will be defined as the design of the project evolves. Construction compounds are likely to include the following:

- secure fencing, CCTV and lighting;
- hardcore or sealed surfaces and drainage;
- site offices, vehicle/ plant storage and associated fuel storage; and
- storage for pipes, equipment and materials.

Open Trench and Trenchless Construction

The EIA sets out that construction of the pipelines would predominantly be undertaken using open-cut trenching methods. During the construction phase, the contractor would define a temporary working width, representing the area within which pipeline installation activities can be safely undertaken. This working corridor would accommodate the excavation of the trench, storage of excavated soils, placement of pipe sections along the route, and movement of construction plant and vehicles. The width required would be influenced by a range of site-specific factors, including ground conditions, pipeline diameter, terrain, and the presence of crossings or other constraints. At this stage, a nominal minimum working width of approximately 35m has been assumed.

Additional temporary working space may be required in certain locations, such as at road, railway and watercourse crossings, locations with sloping ground, and at points where the pipeline alignment changes direction. These areas would provide sufficient space to enable safe construction, manage spoil storage, and accommodate plant, equipment, and temporary laydown.

Pipe sections would be delivered and laid out along the route prior to welding. Welded joints would be inspected and coated before excavation of the trench and lowering of the pipeline. The trench would then be backfilled using excavated material. Construction activities would be sequenced to limit the length of open trench at any one time.

Where shallow rock is encountered, controlled blasting may be required to facilitate trench excavation, where mechanical break-out is unfeasible. National Highways requests that we are consulted in well in advance of any blasting that is required near the SRN.

Prior to commissioning, the pipeline would undergo pre-commissioning activities, including hydrostatic testing, post-construction drainage installation, followed by reinstatement of disturbed ground, services, and stored topsoil.

Where permitted, minor watercourses and drainage ditches would be temporarily crossed using flumed arrangements and ramped access (or similar) to maintain a continuous construction route while allowing uninterrupted water flow. Any land drainage affected during construction would be appropriately managed through the installation of pre-construction drainage to ensure continued operation of local drainage systems.

In certain locations along the proposed pipeline route, trenchless construction methods would be employed where open-cut trenching is either impracticable or not appropriate due to physical or environmental constraints. Such locations typically include crossings of strategic transport infrastructure, such as motorways and major highways (SRN), rail infrastructure, environmentally sensitive receptors (including designated and irreplaceable habitats), and major watercourses such as main rivers and canals. A range of trenchless installation techniques may be utilised, with the most commonly applied methods including:

- HDD: typically applied where ground conditions are suitable and longer, relatively small-diameter crossings are required. The pipeline is assembled along the full length of the crossing prior to installation, meaning that temporary stringing areas are generally comparable in length to the crossing itself. HDD is most appropriate where settlement impacts are not a key constraint. At this stage, it is assumed that temporary launch and reception areas of up to approximately 750m² would be required on either side of the crossing.
- Auger Boring: generally used for shorter crossings undertaken at shallow depth where ground conditions are favourable and limited surface disruption is required.
- Micro-tunnelling: typically employed in locations where overlying infrastructure is particularly sensitive to ground movement, or where challenging subsurface conditions make other trenchless methods unsuitable.

The specific trenchless construction method to be adopted at each crossing would be selected following consideration of a range of factors, including the nature of the feature being crossed, requirements agreed with third-party asset owners, ground conditions, and the length and depth of the crossing. These details would not be confirmed until after the DCO has been granted, the construction contract let, and detailed design completed.

The EIA sets out that temporary lighting would be provided where necessary to ensure the safety of personnel undertaking works during periods of darkness, which are most likely to occur during the winter months. This may include task-specific lighting installed for individual activities, as well as lighting associated with temporary construction compounds. National Highways requests that any temporary lighting that is used, particularly close to any unlit sections of its network, is carefully positioned and pointing downwards to avoid it dazzling users of the SRN.

We understand that the construction programme is currently based on the submission of the DCO application in late (Q3/Q4) 2028 with predicted commencement of construction in Q4 2030 / Q1 2031 and construction of the whole pipeline forecast to last 4 years.

Construction disruption would not occur across the entire length of the pipeline for the whole construction period as the pipeline will be built in sections.

Construction staff and hours of work

The applicant is advising that construction activities are likely to be carried out during core daytime working hours i.e. Monday to Friday 07:00-18:00 and between 08:00 and 13:30 on Saturdays with works not normally scheduled on Sundays or Bank/Public Holidays.

However, some activities may need to be undertaken in the evening / night-time where they cannot be readily paused and hence 24-hour working results. This may include, for example, abnormal load deliveries, dewatering, concrete pours, trenchless crossings, and night-time works within public highways. Some activities may also need to be undertaken outside daytime hours due to programme constraints, if activities do not give rise to unacceptable noise impacts. Potential adverse effects may be mitigated through the final CEMP (an outline version of which will accompany the Application).

Construction workforce

It is normal for construction of the pipeline to be undertaken by multiple working crews operating concurrently at different locations along the route. As works progress, these crews would move sequentially along the alignment. A typical crew is expected to comprise up to approximately 30 personnel, with the overall construction workforce currently anticipated to range between 200 and 500 staff at peak periods based on the applicants' initial estimates. Separate construction teams would also be mobilised for the delivery of Above Ground Infrastructure (AGI).

National Highways requests that workforce car journeys are minimised with minibuses transporting the workforce to worksites where practicable.

Construction Traffic Management

Temporary access to the pipeline corridor from the local highway network would be determined in consultation with the local Highway Authorities. The location of site accesses will consider existing capacity / safety issues and the need for improvements/ temporary traffic management measures (e.g. speed limits, managed site access points using banksmen).

Construction plant and vehicles are expected to comprise a range of typical equipment, including four-wheel-drive vehicles, HGVs, light good vehicles (LGV), cranes, hydraulic excavators, earth-moving plant such as bulldozers, and welding equipment. Further detail on the types and numbers of vehicles required will be confirmed as the design is progressed and the construction programme is developed. The need for temporary haul roads/ access tracks would be established as the project progresses considering the need to access all working areas and based on site conditions.

Prior to construction, a final Construction Traffic Management Plan(s) (CTMP) will be produced illustrating how traffic resulting from the Proposed Development will be managed during construction. The CTMP will include access routes for HGVs,

requirements for any temporary road closures and procedures for managing abnormal indivisible loads, if required. An outline CTMP (oCTMP) will accompany the Application. National Highways requests early engagement with the applicant on the oCTMP / CTMP so that we can advise in good time of any requirements that we may have on these.

Construction Environmental Management

The oCEMP, to be submitted with the application, will include the applicants proposed measures to reduce impacts during construction in relation to:

- use of land for temporary laydown areas, welfare facilities etc.;
- construction traffic (including parking and access requirements) and changes to
- access and temporary road or footpath closures (only if required);
- utilities diversions required;
- handling of soil resources;
- earthworks;
- control of noise / vibration, via implementation of Best Practicable Means (BPM);
- construction lighting;
- utilities diversions, if required;
- dust suppression;
- water resources, flood risk mitigation, run off and drainage; and
- waste management.

The final CEMP will be secured by a requirement of any DCO that is granted and will identify the relevant procedures to be adhered to throughout construction.

Restoration/ landscaping

The EIA advises that following completion of pipeline and AGI construction the temporary construction compounds would be decommissioned and the affected land reinstated to its pre-construction condition as far as reasonably practicable. An outline LEMP (oLEMP) will accompany the Application.

National Highways advise that for reasons of safety, liability and maintenance, as set out in DfT Circular 01/2022 all landscaping and screening required by the development must be located wholly within the development site and sufficiently within it to ensure maintenance can take place without encroachment into highway land. We also have restrictions on the species which are suitable for planting in proximity to the highway soft estate, and from a review of the submitted landscaping plan we note that at least one of these species has been included (*prunus spinosa*) which will need to be removed from the planting mix for the plan to be acceptable.

The applicant will therefore need to be aware that the following species must not be planted within 10m of our estate:

1. Blackthorn (*Prunus spinosa*)
2. Goat willow (*Salix caprea*)
3. Crack willow (*Salix fragilis*)
4. Dogwood (*Cornus sanguinea*)
5. Italian alder (*Alnus cordata*)
6. Bird cherry (*Prunus avium*)

7. Quaking Aspen (*Poplus tremulans*)
8. Wild Privet (*Ligustrum vulgare*)

and in addition, the following trees must not be planted in a position where at maturity they would be within falling distance of the carriageway or any significant National Highways asset:

9. Silver Birch (*Betula pendula*)
10. Austrian Pine (*Pinus nigra*)
11. Poplar (*Poplus alba, Poplus hybrid, Poplus lombardii*)
12. English Oak (*Quercus robur*).

Furthermore, as the applicant will need to be aware, the planting of ash (*Fraxinus excelsior*) and larch (*Larix s*p) is ill advised due to the current diseases they spread and succumb to.

National Highways advise that based on our experience of pipeline schemes that the construction phase usually has the greatest quantum of vehicle movements although once these are distributed across the network and at the time they are likely to be occurring they would normally be expected to have minimal impact on the SRN. However, we request that we continue to be consulted on this application as it progresses and especially regarding any Abnormal Indivisible Loads using our network for which the applicant will require our agreement and advice in using the SRN for these movements.

To ensure that the interests of the SRN are safeguarded, NH will seek an approval right in respect of the relevant DCO requirement which secures the CTMP. We recommend that the Applicant drafts the relevant DCO requirement to include NH as an approving highway authority with respect to matters concerning the SRN at the point of application submission to avoid the applicant incurring costs in defending against NH's stated position in examination and to ensure the appropriate highway authority has the benefit of the relevant approval right.

It should be noted that any abnormal loads would need to be approved via Electronic Service Delivery for Abnormal Loads (EDSAL) - https://nationalhighways.co.uk/road-safety/abnormal-loads-and-the-esdal-system.

Operational Phase

The EIA states that the operational life of Humber pipeline is expected to be up to 50 years with it having been designed in line with the requirements of PSR (Ref 4.13), with consideration given from the outset to enabling safe inspection, access, and ongoing maintenance. Following installation, the route would be protected through the establishment of appropriate legal agreements, such as easements or leases. These arrangements would help control third-party activities near the pipeline, limit the risk of accidental damage from groundworks, and ensure that access can be maintained for inspection, maintenance, or repair if required.

Once the pipeline is operational, it would be managed in accordance with an established inspection and maintenance regime that reflects regulatory requirements and recognised industry good practice. This would typically comprise the following activities:

- routine visual inspections of the pipeline corridor from vantage points or via aerial surveying methods, generally undertaken at regular intervals (for example, on an approximately fortnightly basis);
- scheduled walk-over inspections along the full length of the pipeline route, carried out at defined intervals (no less frequently than every four years);
- ongoing monitoring and testing of the CP system, including:
    - periodic checks of transformer rectifier units and current measurements at designated CP test points (commonly undertaken monthly);
    - inspections of electrical components, safety and protection systems, and confirmation of operational status (typically undertaken every six months); and
    - surveys to identify any damage or defects in pipeline coatings at longer-term intervals (typically around every four years).
- internal inspection and cleaning of the pipeline using PIGs, generally undertaken on a cyclical basis (approximately every five years).

It is understood that any issues identified through monitoring or inspection activities would be managed through the implementation of appropriate follow-up measures to address the matter identified.

Above Ground Installations (AGIs)

The AGIs are usually monitored and controlled remotely from an off-site control room. The precise frequency of on-site maintenance is yet to be confirmed but the EIA sets out that the following could be expected:

- approximately fortnightly routine inspections, involving one to two staff attending site on one day;
- annual maintenance visits undertaken by two staff visiting site for approximately one day;
- periodic major maintenance, undertaken every two to five years, involving up to five staff who would be on site for approximately one week;
- pipeline inspection operations, carried out at intervals of approximately five to 15 years, involving around ten staff for approximately one week; and
- occasional breakdown or emergency call outs, with access available at any time on a 24-hour basis if necessary.

Staff would typically travel to site by car or light commercial vehicle. The use of HGVs would be by exception and would generally only be required when large items of equipment require replacement (this could be due to the end of its operational life or through unexpected equipment failure).

Based on the above and National Highways experience we would expect vehicle movements during the operational phase to be minimal and have no material impact on the SRN.

<u>Decommissioning Phase</u>

As set out above, the Humber pipeline is assumed to be operational for a period of 50 years, with operational life likely to be extended further through appropriate monitoring and maintenance.

At the end of the operational life of the Proposed Development the pipeline would be decommissioned safely and left in situ in line with current UK industry practice All above ground structures, including sections of pipework, will be removed and land will be restored as far as reasonably practicable to its previous condition, unless otherwise agreed with landowners.

Based on the above National Highways advises that vehicle movements during the decommissioning phase are usually less than the construction phase and therefore would normally have no material impact on the SRN. However, we welcome any forecasts of vehicle movements that the applicant can provide.

Protective Provisions

We advise that NH is a statutory undertaker and will require the Applicant to agree to its standard form protective provisions to safeguard the interests of the SRN and to ensure the protection of the public that use it.

We recommend that the Applicant's appointed legal advisors contact our legal team at the earliest possible opportunity to agree the provisions which will be included in the draft DCO at the point of submission of your application.

LegalServicesInbox@nationalhighways.co.uk

Please also note that pursuant to section 54A of the Planning Act 2008 and Regulation 12A of and Schedule 2 to the Infrastructure Planning (Fees) Regulations 2010 (as amended), NH is a prescribed public authority entitled to the recovery of its reasonable fees associated with any relevant service. These services cover all stages of the DCO process including pre-application consultation. The charging policy which NH applies can be found on our website - https://nationalhighways.co.uk/our-roads/planning-and-the-strategic-road-network-in-england .

National Highways welcomes further engagement with the applicant to discuss the DCO Application and its impacts on the SRN as the DCO progresses. Please note that these comments are provided based on the information currently available to us and are made without prejudice to future advice and/or recommendations.

I trust this response is helpful, but should you require any further information please do not hesitate to contact me.

Yours sincerely,

Paula Bedford sent on behalf of

[redacted]

Rebecca Garrett
Planning and Development
[redacted]@nationalhighways.co.uk

Date: 09 June 2026
Our ref: 549028
Your ref: EN0710008

eastcoasthydrogenhumber@planninginspectorate.gov.uk

BY EMAIL ONLY

Consultations
Hornbeam House
Crewe Business Park
Electra Way
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CW1 6GJ

T 0300 060 900

Dear Inspector

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

Proposal: East Coast Hydrogen Humber Pipeline
Location: Saltend (East Riding of Yorkshire) east of Hull to Byram north of Knottingley (North Yorkshire), and Knottingley (Wakefield)

Thank you for seeking our advice on the scope of the Environmental Statement (ES) in the consultation dated 19 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). Annex A to this letter provides Natural England's advice on the scope of the Environmental Impact Assessment (EIA) for the proposed Detailed advice on scoping the Environmental Statement is available in the attached Annex.

For any further advice on this consultation please contact the case officer [redacted]@naturalengland.org.uk and copy to consultations@naturalengland.org.uk.

Yours sincerely

Lisa Sheldon
Yorkshire and Northern Lincolnshire Area Team
Natural England

Annex A – Natural England's Advice on EIA Scoping

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 provided[1].
- 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

Cumulative and in-combination effects

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
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.

[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)

We advise that Figure 1.3, as shown in the submitted Scoping Report, shows there is overlap between the Application search area and the Yorkshire Energy Park development (planning reference 17/01673/STOUTE, East Riding of Yorkshire Council). This includes overlap with the proposed mitigation for impacts to wintering and passage birds associated with the Humber Estuary SPA and Ramsar.

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.

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 (EcIA) is the process of identifying, quantifying, and evaluating the potential impacts of defined actions on ecosystems or their components. EcIA may be carried out as part of the EIA process or to support other forms of environmental assessment or appraisal. Guidelines and an EcIA checklist have been developed by the Chartered Institute of Ecology and Environmental Management (CIEEM).

Many public authorities e.g. National Highways and National Grid have biodiversity duties including taking opportunities for habitat restoration or enhancement. They might have Key Performance Indicators (KPIs) to adhere to via Government policy, or have agreed approaches to BNG. Further information around general duties is available here.

Remember to refer to the relevant sector specific information within National Policy Statements here and our own sector specific guidance on the SD Toolkit.

Designated nature conservation sites

International and European sites

European site conservation objectives are available at http://publications.naturalengland.org.uk/category/6490068894089216.

Evidence Plans are a useful mechanism NSIP applicants can use to agree what information should be provided to the Planning Inspectorate and Natural England when undertaking Habitats Regulations Assessment (HRA). Agreeing the evidence-needs of the project early prior to applying for Development Consent will help reduce delays in the process. More information on Evidence Plans is available here.

You should also consider where applicable our advice on the environmental considerations and use of data and evidence to support offshore wind and cable projects in English waters – see: Environmental considerations for offshore wind and cable projects - Home (sharepoint.com). This includes Natural England and Joint Nature Conservation Committee (JNCC)'s shared advice on 'Nature conservation considerations and environmental best practice for subsea cables in English inshore and UK offshore waters'. The outputs of Natural England's project 'Offshore Wind Marine Environmental Assessments: Best Practice Advice for Evidence and Data Standards' are also provided.

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.

The development site is within or may impact on the following **European/internationally designated nature conservation site(s):**

- Humber Estuary Special Protection Area (SPA)
- Humber Estuary Special Area of Conservation (SAC)
- Humber Estuary Ramsar
- Lower Derwent Valley SPA
- Lower Derwent Valley SAC
- Lower Derwent Valley Ramsar
- River Derwent SAC
- Thorne Moor SAC
- Thorne & Hatfield SPA

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.

Table 1: Potential risk to international designated sites: the development is within or may impact on the following sites	
Site name with link to conservation objective	**Potential impact pathways where further information/assessment is required**
Humber Estuary SPA European Site Conservation	Potential impacts to functionally linked land Special Protection Areas (SPAs) are classified for rare and vulnerable birds. Many of these sites are designated for mobile

Table 1: Potential risk to international designated sites: the development is within or may impact on the following sites	
Site name with link to conservation objective	**Potential impact pathways where further information/assessment is required**
Objectives for Humber Estuary SPA Humber Estuary Ramsar Designated Sites View (naturalengland.org.uk) Lower Derwent Valley SPA European Site Conservation Objectives for Lower Derwent Valley SPA - UK9006092 Lower Derwent Valley Ramsar Designated Sites View	species that may also rely on areas outside of the site boundary. These supporting habitats may be used by SPA populations or some individuals of the population for some or all of the time. These supporting habitats can play an essential role in maintaining SPA species populations, and proposals affecting them may therefore have the potential to affect the European site. The project's order limits cover a significant area, in proximity to a number of internationally designated sites. The ES/HRA should therefore consider both direct 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 SPA. Natural England advises the ES/HRA should consider: - Impacts due to temporary/permanent loss of functionally linked habitat for SPA bird species. - Disturbance impacts to functionally linked land adjacent to the project area due to disruption of open vistas, acoustic impacts, vibration, and artificial lighting, during construction. For information on the waterbird assemblage component species see Annex B for Humber Estuary SPA and Annex B1 for the Lower Derwent Valley SPA. We advise wintering and passage bird surveys should be undertaken to determine the disturbance impacts to birds using functionally linked land associated with Humber Estuary and Lower Derwent Valley designated sites. Please see Annex C for information on the preferred survey methodology. <u>Potential impacts due to noise and visual disturbance on designated sites</u> Where the development is located in close proximity to a European site boundary (within ~300m) the potential for noise and visual disturbance during the construction phase on the designated site should be assessed. In the first instance, consideration should be given to avoidance of work in these locations during the most significant periods of bird use. <u>Potential impacts to water quality and water supply</u> Where hydrological connectivity is identified, the assessment should consider the potential for pollution impacts to habitat which supports the SPA and Ramsar features within the

Table 1: Potential risk to international designated sites: the development is within or may impact on the following sites	
Site name with link to conservation objective	**Potential impact pathways where further information/assessment is required**
	designated site. For more information on what should be included within this assessment, please see the requirements under Thorne Moor SAC and Humber Estuary SAC.
Thorne & Hatfield Moors SPA European Site Conservation Objectives for Thorne & Hatfield Moors SPA - UK9005171	Potential impacts to functionally linked land Natural England considers that the proposed development also has the potential to impact SPA bird species using functionally linked land associated with the Thorne and Hatfield Moors SPA. Thorne and Hatfield Moors SPA is designated for supporting more than 1% of Great Britain's population of breeding pairs of nightjar. On-going surveying of the nightjar populations on the SPA has revealed that feeding flights are not confined to the SPA, with the hinterland around the edge of the SPA being utilised extensively by feeding birds. Nightjar are known to forage up to 5km from Thorne and Hatfield Moors SPA, tagging studies have shown that the majority of habitat usage outside the designated site is within 3km. The Conservation Objectives Supplementary Advice (COSA) for the Thorne and Hatfield Moors SPA details a number of targets which relate to *"Supporting habitat (both within and outside the SPA)."* We highlight that the COSA should be used to inform the ES/HRA, considering potential impacts on the SPA. Natural England advises that the ES/HRA should consider: • Potential loss of functionally linked feeding habitat for nightjar. • Potential disturbance impacts to functionally linked land during construction and operation. • Anticipated timings/lengths of works, as nightjar are present only in April to August inclusive, and they only forage at night. In particular, we recommend you obtain the following information to support the ES/HRA: • Conduct a desk-based assessment - using aerial photography, mapping, habitat maps and relevant ecological literature – of the suitability for nightjar of the habitats present on the proposed site and adjacent fields. Nightjar foraging habitat can include hedgerows, scrub, grassland, ditches and ponds. We highlight that Policy 30(E) of the Doncaster Local Plan states: *"in order to ensure development does not negatively impact on nightjar populations, proposals located within 3km of*

Table 1: Potential risk to international designated sites: the development is within or may impact on the following sites	
Site name with link to conservation objective	**Potential impact pathways where further information/assessment is required**
	Thorne and Hatfield Moors Special Protection Area, that impact habitats that nightjars may use for feeding on, will only be supported where they deliver a net gain in nightjar foraging habitat."
Thorne Moor SAC European Site Conservation Objectives for Thorne Moor SAC - UK0012915 Humber Estuary SAC European Site Conservation Objectives for Humber Estuary SAC - UK00300170	Potential impacts to water quality and water supply The ES should consider hydrological connectivity between the Application and the designated sites. There should be consideration on whether there are likely impacts to the water quality of designated site watercourses due to pollution incidents during construction, and appropriate mitigation should be proposed to manage this. There should also be consideration of the potential for the application to affect water supply connections to the designated sites during construction and operation. Where non-intrusive water crossing approaches are proposed to reduce direct habitat impacts (ie. Horizontal Directional Drilling), the impacts from this should also be addressed in relation to the designated sites. The assessment should include identification of the source of the water for the drill and whether this is likely to be abstracted from designated site water supplies.
River Derwent SAC European Site Conservation Objectives for River Derwent SAC - UK0030253	Potential impacts to migrating fish The ES should consider direct and indirect impacts to migrating SAC fish species; river lamprey and sea lamprey. The River Derwent SAC is upstream of the order limits, however the potential for impacts during migration outside of the designated site should be considered as part of an assessment of water crossing impacts. The ES should assess water channels connected to the River Derwent which the proposed pipeline route will cross and determine whether these watercourses are likely to form part of the migration routes. If there is a connection, then aspects such as noise and vibration on the water course due to depth of the crossing, and the required stand-off distances for entry and exit points should be considered, along with the standard impacts of open cut crossings.
Lower Derwent Valley SAC European Site Conservation Objectives for Lower	Potential impacts to otter The ES should consider direct and indirect impacts to Otter associated with Lower Derwent Valley SAC and River Derwent SAC which may use watercourses outside of designated site boundaries. We advise that the ES should consider the potential

Table 1: Potential risk to international designated sites: the development is within or may impact on the following sites	
Site name with link to conservation objective	**Potential impact pathways where further information/assessment is required**
Derwent Valley SAC - UK0012844 River Derwent SAC European Site Conservation Objectives for River Derwent SAC - UK0030253	connectivity of water courses, suitability of habitats, and the distance that otter are likely to travel when assessing the direct and indirect impacts to the SAC features.
All internationally designated sites in proximity to the proposed Application	Natural England advises that the potential for air quality impacts arising from this development needs to be assessed. Natural England refers the decision maker and Applicant to the Standard Advice in Annex D. This standard advice is Natural England's formal statutory advice and is a material consideration. It provides decision makers with the information needed to fulfil their statutory duties when making decisions on planning applications with potential air pollution impacts. An overall conclusion regarding impacts on statutory protected sites must take into account the standard advice for air pollution. This will be for the decision maker to determine.

Nationally designated sites

Sites of Special Scientific Interest

Sites of Special Scientific Interest 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 **Sites of Special Scientific Interest:**

- Humber Estuary
- Barn Hill Meadows
- Eskamhorn Meadows
- Thorne, Crowle and Goole Moors
- River Derwent
- Breighton Meadows

The ES should include a full assessment of the direct and indirect effects of the development on the features of special interest within the 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**
Humber Estuary Citation	The impacts to Humber Estuary SSSI are as described for Humber Estuary SPA, SAC and Ramsar sites in Table 1 above.
Barn Hill Meadows Citation	The application boundary is adjacent to Barn Hill Meadows SSSI. The ES should assess the potential for pollution incidents during construction. This should include both water quality pollution incidents (such as oil spills) and airborne pollutants such as dust. We advise there is potential for dust impacts to habitats within 200m of a construction site. Potential encroachment onto the designated site boundary during construction should be avoided through appropriate micro-siting of construction compounds and storage areas.
Eskamhorn Meadows Citation	The application boundary is adjacent to Eskamhorn Meadows SSSI. The ES should assess the potential for pollution incidents during construction. This should include both water quality pollution incidents (such as oil spills) and airborne pollutants such as dust. We advise there is potential for dust impacts to habitats within 200m of a construction site. Potential encroachment onto the designated site boundary during construction should be avoided through appropriate micro-siting of construction compounds and storage areas.
Thorne, Crowle and Goole Moors Citation	The impacts to Thorne, Crowle and Goole Moors SSSI are as described for Thorne Moor SAC and Thorne & Hatfield SPA in Table 1 above.
River Derwent Citation	The impacts to River Derwent SSSI are as described for River Derwent SAC in Table 1 above.
Breighton Meadows Citation	The impacts to Breighton Meadows SSSI are as described for Lower Derwent Valley SPA and Ramsar sites in Table 1 above.
All nationally designated sites in proximity to the proposed Application	Natural England advises that the potential for air quality impacts arising from this development needs to be assessed. Natural England refers the decision maker and Applicant to the Standard Advice in Annex B. This standard advice is Natural England's formal statutory advice and is a material consideration. It provides decision makers with the information needed to fulfil their statutory duties when making decisions on planning applications with potential air pollution impacts.

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**
	An overall conclusion regarding impacts on statutory protected sites must take into account the standard advice for air pollution. This will be for the decision maker to determine.

Regionally and Locally Important Sites

Local sites are identified by the local Wildlife Trust, geoconservation group or other local group. The ES should set out proposals for mitigation of any impacts and if appropriate, compensation measures and opportunities for enhancement and improving connectivity with wider ecological networks. They may also provide opportunities for delivering beneficial environmental outcomes.

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.

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.

District Level Licensing (DLL) for great crested newts

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.

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

Ancient Woodland, ancient and veteran trees

The ES should assess the impacts of the proposal on the ancient woodland and any ancient and veteran trees, and the scope to avoid and mitigate for adverse impacts. It should also consider opportunities for enhancement.

Ancient woodland is an irreplaceable habitat of great importance for its wildlife, its history, and the contribution it makes to our diverse landscapes. Paragraph 186 of the National Planning Policy Framework (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.

Biodiversity net gain

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. It is the intention that BNG should apply to all terrestrial NSIPs accepted for examination from November 2025. This includes the intertidal zone but excludes the subtidal zone (an approach to marine net gain is being developed but this will not form part of mandatory BNG). Projects that span both offshore and onshore will be subject to BNG requirements for the onshore components only. Some organisations have made public BNG commitments, and some projects are already delivering BNG on a voluntary basis.

Landscape and visual impacts

Public bodies have a duty to seek to further the statutory purposes of designation in carrying out their functions (under section 245 of the Levelling Up and Regeneration Act 2023).This duty also applies to proposals outside the designated area but impacting on its natural beauty.

The National Policy Statement for the relevant sector might have stronger protections. The Energy National Policy Statement EN-1 gives significant protection including within the setting of the protected landscape.

Consideration should be given to the direct and indirect effects on this designated landscape and in particular the effect upon its purpose for designation. The management plan for the designated landscape may also have relevant information that should be considered in the EIA.

The environmental assessment should refer to the relevant National Character Areas. Character area profiles set out descriptions of each landscape area and statements of

environmental opportunity.

The EIA should include a full assessment of the potential impacts of the development on local landscape character using landscape assessment methodologies. We encourage the use of Landscape Character Assessment (LCA), based on the good practice guidelines produced jointly by the Landscape Institute (LI) and Institute of Environmental Management and Assessment (IEMA) in 2013. LCA provides a sound basis for guiding, informing, and understanding the ability of any location to accommodate change and to make positive proposals for conserving, enhancing or regenerating character.

A landscape and visual impact assessment should also be carried out for the proposed development and surrounding area. Natural England recommends use of the methodology set out in Guidelines for Landscape and Visual Impact Assessment 2013 (3rd edition) produced by LI and IEMA. For National Parks and AONBs, we advise that the assessment also includes effects on the 'special qualities' of the designated landscape, as set out in the statutory management plan for the area. These identify the particular landscape and related characteristics which underpin the natural beauty of the area and its designation status.

The assessment should also include the cumulative effect of the development with other relevant existing or proposed developments in the area. This should include an assessment of the impacts of other proposals currently at scoping stage.

To ensure high quality development that responds to and enhances local landscape character and distinctiveness, the siting and design of the proposed development should reflect local characteristics and, wherever possible, use local materials. Account should be taken of local design policies, design codes and guides as well as guidance in the National Design Guide and National Model Design Code. The ES should set out the measures to be taken to ensure the development will deliver high standards of design and green infrastructure. It should also set out detail of layout alternatives, where appropriate, with a justification of the selected option in terms of landscape impact and benefit.

The National Infrastructure Commission has also produced Design Principles for National Infrastructure - NIC endorsed by Government in the National Infrastructure Strategy.

Connecting people with nature

The ES should consider the potential impacts on the Click here to enter text. National Trail. The National Trails website www.nationaltrail.co.uk provides further information.

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 NPPF paragraph 104 and there will be reference in the relevant National Policy Statement. It 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 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.

Relevant aspects of local authority green infrastructure strategies should be incorporated where appropriate.

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.

This may require a detailed Agricultural Land Classification (ALC) survey if one is not already available. For information on the availability of existing ALC information see www.magic.gov.uk.

- Where an ALC and soil survey of the land is required, this should normally be at a detailed level, e.g. one auger boring per hectare, (or more detailed for a small site) 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. 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).
- The ES should set out details of how any adverse impacts on BMV agricultural land can be minimised through site design/masterplan.
- 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.

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.

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

[1] Report: Trends Report 2020: Trends in critical load and critical level exceedances in the UK - Defra, UK

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 NOx and SO_2 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 has produced guidance for public bodies to help assess the impacts of road traffic emissions to air quality capable of affecting European Sites. Natural England's approach to advising competent authorities on the assessment of road traffic emissions under the Habitats Regulations - NEA001

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

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.

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.

Climate change

Natural England is committed to delivering more renewable energy in a sustainable manner which avoids adverse impacts on the natural environment and seeks to contribute to nature recovery, in line with the Environmental Improvement Plan target.

The ES should have regard to the requirements of the relevant National Policy Statements for Energy Infrastructure for climate resilience and nature recovery.

Annex B: Humber Estuary Special Protection Area: non-breeding waterbird assemblage (Version 3, July 2025)

The Humber Estuary Special Protection Area (SPA) qualifies under article 4.2 of the European Commission Bird Directive (79/409/EEC) in that it supports an internationally important assemblage of waterbirds. Confusion can arise concerning which species to consider when assessing the Humber Estuary SPA non-breeding, waterbird assemblage feature.

Natural England recommends focusing on what are referred to as the 'main component species' of the assemblage. Main component species are defined as:
All species listed individually under the assemblage feature on the SPA citation (i.e the species that qualified in 2007 when the site was designated).

Species which might not be listed on the SPA citation but occur at site levels of more than 1% of the national population according to the most recent Humber Estuary Wetland Bird Survey (WeBS) 5-year average count (currently 2018/19 - 2022/23).

Species where more than 2000 individuals are present according to the most recent Humber Estuary WeBS count.

The assemblage qualification is therefore subject to change as species' populations change. It should be noted that species listed on the citation under the assemblage features, whose populations have fallen to less than 1% of the national population, retain their status as a main component species and should be considered when assessing the impacts of a project or plan on the Humber Estuary SPA.

Natural England advises that the main component species of the Humber Estuary SPA non- breeding waterbird assemblage include (July 2024):

Species listed individually under the assemblage feature on the SPA citation:
Avocet, *Recurvirostra avosetta* (non-breeding)
Bar-tailed godwit*, Limosa lapponica* (non-breeding)
Bittern, *Botaurus stellaris* (non-breeding)
Black-tailed godwit*, Limosa limosa islandica* (non-breeding)[1]
Brent goose, *Branta bernicla* (non-breeding)[1]
Curlew, *N. arquata* (non-breeding)[1]
Dunlin, *Calidris alpina alpina* (non-breeding)[1]
Golden plover, *Pluvialis apricaria* (non-breeding)[1]
Goldeneye, *Bucephala clangula* (non-breeding)
Greenshank, *T. nebularia* (non-breeding)
Grey plover, *P. squatarola* (non-breeding)
Knot, *Calidris canutus* (non-breeding)
Lapwing, *Vanellus vanellus* (non-breeding)[1]
Mallard, *Anas platyrhynchos* (non-breeding[1]
Oystercatcher, *Haematopus ostralegus* (non-breeding)
Pochard, *Aythya farina* (non-breeding)
Redshank, *Tringa totanus* (non-breeding[1]
Ringed plover, *Charadrius hiaticula* (non-breeding)
Ruff, *Philomachus pugnax* (non-breeding)[1]

Sanderling, *Calidris alba* (non-breeding)

Scaup, *Aythya marila* (non-breeding)
Shelduck, *Tadorna tadorna* (non-breeding) [1]
Teal, *Anas crecca* (non-breeding)[1]
Turnstone, *Arenaria interpres* (non-breeding)
Whimbrel, *Numenius phaeopus* (non-breeding)[1]
Wigeon, *Anas Penelope* (non-breeding)[1]

And

Species which are not listed on the SPA citation but occur at site levels of more than 1% of the national population according to the most recent Humber Estuary Wetland Bird Survey (WeBS) 5-year average count:

Greylag goose, *Anser anser* (non-breeding)[1]
Little egret, *Egretta garzetta* (non-breeding)[1]
Pink-footed goose, *Anser brachyrhynchus* (non-breeding)[1]
Shoveler, *Anas clypeata* (non-breeding)
Gadwall, *Anas strepera* (non-breeding)
Pintail, *Anas acuta* (non-breeding)
White-fronted goose, *Anser albifrons* (non-breeding)[1]
Great white egret, *Ardea alba* (non-breeding)[1]
Crane, *Grus grus* (non-breeding)[1]

As stated above, the assemblage qualification is subject to change as species' populations change; therefore, the appropriate WeBS data should be considered in any assessment and the above list should be used as a guide only.

It should be noted that some species, such as **Snipe (*Gallinago gallinago*)**, **Jack Snipe (*Lymnocryptes minimus*)** and Water Rail (*Rallus aquaticus*) have known undercounts in the WeBS data. Therefore, high counts of these species should also be considered. Please note, the advice set out above should be considered when assessing potential impacts on the waterbird assemblage feature. You will also need to consider potential impacts on species which are not considered to be non-breeding waterbirds but are listed on the citation qualifying under article 4.1 and 4.2 of the Directive. These include:

Hen harrier, *Circus cyaneus* (non-breeding)[1]
Marsh Harrier, *Circus aeruginosus* (breeding)[1]
Little tern, *Sterna albifrons* (breeding)
Avocet, *Recurvirostra avosetta* (breeding)
Bittern, *Botaurus stellaris* (breeding)

The species marked [1] **in bold text** are known to use off-site supporting habitat / functionally linked land (FLL) (e.g. arable farmland, grassland/pasture, and/or non-estuarine waterbodies) in the non-breeding season and may therefore be the most relevant for assessing potential impacts of a proposed plan/project on birds using FLL associated with the Humber Estuary SPA. However, please note that this list should be used as a guide only; usage may depend on factors such as the habitats available on the site and distance to the Humber Estuary etc. Therefore, assessments of potential impacts on birds using functionally linked land should consider all relevant species and clear justification should be provided if any species are excluded from the assessment.

Annex B1: Lower Derwent Valley Special Protection Area: non-breeding waterbird assemblage (Version 1.1, June 2023)

The Lower Derwent Valley Special Protection Area (SPA) qualifies under article 4.2 of the European Commission Bird Directive (79/409/EEC) in that it supports an internationally important assemblage of waterbirds. Confusion can arise concerning which species to consider when assessing the Lower Derwent Valley SPA non-breeding, waterbird assemblage feature.

Natural England recommends focusing on what are referred to as the 'main component species' of the assemblage. Main component species are defined as:

a. All species listed individually under the assemblage feature on the SPA citation (i.e. the species that qualified when the site was designated).
b. Species which might not be listed on the SPA citation but occur at site levels of more than 1% of the national population according to the most recent Lower Derwent Ings Wetland Bird Survey (WeBS) count.
c. Species where more than 2000 individuals are present according to the most recent Lower Derwent Ings WeBS count.

The assemblage qualification is therefore subject to change as species' populations change. It should be noted that species listed on the citation under the assemblage feature, whose populations have fallen to less than 1% of the national population, retain their status as a main component species and should be considered when assessing the impacts of a project or plan on the Lower Derwent Valley SPA.
Natural England advises that the main component species of the Lower Derwent Valley SPA include (June 2023):

a) Species listed individually under the assemblage feature on the SPA citation:

- Pochard, *Aythya ferina* (non-breeding)
- **Ruff, *Philomachus pugnax* (non-breeding)[1]**
- Shoveler, *Anas clypeata* (non-breeding)
- **Teal, *Anas crecca* (non-breeding)[1]**
- **Whimbrel, *Numenius phaeopus* (non-breeding)[1]**
- **Wigeon, *Anas Penelope* (non-breeding)[1]**

And
b) Species which are not listed on the SPA citation but occur at site levels of more than 1% of the national population according to the most recent Lower Derwent Ings Wetland Bird Survey (WeBS) 5-year average count:

- Gadwall, *Anas strepera* (non-breeding)
- **Greylag goose, Anser answer (non-breeding)[1]**
- Pintail, *Anas acuta* (non-breeding)
- **Whooper swan, *Cygnus cygnus* (non-breeding)[1]**

And
c) Species where more than 2000 individuals are present according to the most recent Lower Derwent Ings WeBS 5-year average count:

- **Golden plover, *Pluvialis apricaria* (non-breeding)[2]**
- **Lapwing, *Vanellus vanellus* (non-breeding)[1]**

As stated above, the assemblage qualification is subject to change as species' populations change; therefore, the appropriate WeBS data should be considered in any assessment and the above list should be used as a guide only.

Please note, the advice set out above should be considered when assessing potential impacts on the waterbird assemblage feature. You will also need to consider potential impacts on other individual species listed on the citation qualifying under article 4.1 and 4.2 of the Directive. These include:

- **Bewick's swan, *Cygnus columbianus bewickii* (non-breeding)**[1]
- Shoveler, *Anas clypeata* (breeding)

Further detailed guidance on assessing potential impacts on the Lower Derwent Valley SPA can be found in the Supplementary advice on conserving and restoring site features. Individual species listed on the citations for the relevant underpinning Sites of Special Scientific Interest (SSSIs) should also be considered in assessments of potential SSSI impacts, where appropriate.

The species marked [1]**in bold text** are known to use off-site supporting habitat / functionally linked land (FLL) (e.g. arable farmland, grassland/pasture, and/or wetlands/waterbodies outside the designated site) and may therefore be the most relevant for assessing potential impacts of a proposed plan/project on birds using FLL associated with the Lower Derwent Valley SPA. However, please note that this list should be used as a guide only; usage may depend on factors such as the habitats available on the site and distance to the Lower Derwent Valley SPA etc. Therefore, assessments of potential impacts on birds using functionally linked land should consider all relevant species and clear justification should be provided if any species are excluded from the assessment.

Annex C: Passage and wintering bird surveys for functionally linked land associated with the Humber Estuary and/or Lower Derwent Valley designated sites (Version 1.1, December 2021)

Background

The below guidance is intended to inform assessments of proposed development sites in proximity to the Humber Estuary and/or the Lower Derwent Valley designated sites only, where potential impacts from loss of/disturbance to functionally linked land (FLL) have been identified, for example due to presence of suitable habitat (such as arable land/grassland or open waterbodies) and/or relevant bird records and/or local knowledge.

Natural England recommends that surveys are undertaken of the site and surrounding fields to provide an overview of bird usage during wintering and spring/autumn passage periods.

We recommend that the surveys are carried out in line with the following best practice guidance. Where alternative approaches are used, clear justification should be provided.

Please note that recommended survey periods, frequency and design may differ for sites located within the boundaries of Humber Estuary or Lower Derwent Valley designated sites, or in proximity to other designated sites. Please contact Natural England in such cases.

Survey periods and frequency

Natural England recommends that surveys are completed at the following frequency:

- Autumn Passage – two surveys per month between August to October inclusive.
- Winter - two surveys per month between October to March inclusive.
- Spring Passage – two surveys per month between March - Mid-May inclusive.

We advise that spring and autumn passage surveys are completed (in addition to winter surveys) as the Humber Estuary and Lower Derwent Valley SPAs are important for species migrating between breeding and wintering sites. Further advice on seasonality for Humber Estuary SPA and Lower Derwent Valley SPA designated features can be found at Designated Sites View (naturalengland.org.uk) and UK9006092_Lower Derwent Valley_SPA_Published 14 Sep 2023 (naturalengland.org.uk), respectively.

Weekly visits during the autumn and spring passage periods are recommended where birds are likely to be present in the migration period only, due to high turnover of birds during migration. Note that certain passage species, such as whimbrel associated with the Lower Derwent Valley SPA, may have specific survey requirements due to their migration behaviour. Please discuss such cases with Natural England.

Natural England recommends that two years of wintering and passage surveys should be completed in certain cases to provide a more robust understanding of SPA bird usage on the site and inform design of suitable mitigation, where relevant. This will depend on site-specific factors, for example where proposed development sites:

- are in very close proximity to the designated site/s; and/or
- have a large development footprint; and/or
- are expected/shown to have high bird sensitivity, especially where activity varies significantly between years; and/or

- existing bird records / expert advice demonstrates usage of the site by high numbers of SPA birds.

Please contact Natural England if you are unclear on whether two years of wintering and passage surveys are recommended for this proposal.

Survey design

Wintering/passage surveys should be designed to ensure that results are sufficient to provide a robust picture of distribution, abundance and regularity of use by waterbirds associated with the Humber Estuary and/or Lower Derwent Valley SPAs across the full extent of the proposed development site. Please refer to Annex B and/or Annex B1 for the non-breeding waterbird assemblage list for the Humber Estuary and Lower Derwent Valley SPA, respectively.

A detailed methodology should be included in the relevant report/s, including key information such as number of visits, date and time of visits, viewpoint locations and/or transect routes walked. The survey results should provide some understanding of how the birds use the site (for example, for roosting or foraging) as well as presence/ absence. We would expect to see commentary of birds landing and taking off within and out-with the development site. We also recommend recording birds in flight, particularly if the application may have the potential to affect bird flight lines.

Consideration should also be given to surveys in poor weather/ visibility conditions. Usual survey methodology is to avoid surveying in poor conditions due to potential reduced detectability of birds. However, use can vary in different weather conditions, so it may be helpful to carry on with surveys in poor weather. Weather conditions may affect the results of the surveys and therefore should be considered in assessing the robustness of the dataset.

In addition, details of wider weather conditions should be included, for example, where there may have been a particularly wet or cold season and this may change bird distribution across the area, due to frozen ground etc. Furthermore, a milder autumn may lead to wintering birds arriving later and vice versa in colder autumns.

The methodology should also consider whether the site has any seasonal features such as dips and low-lying areas that retain water at particular times, for example early in the season or in wet years. These areas may have importance for waders at these times, but if surveyed during a drier spell or where full passage/winter surveys have not been completed, it may be possible to underestimate the importance of the site.

For sites in close proximity to the Humber Estuary, the surveys should cover different tidal states. Use of sites closer to the estuary are more likely to be tidally influenced. For sites which may potentially affect high tide roosts, observations should be conducted from two hours before high tide to two hours after high tide. For sites where there are high tide roosts, it may be beneficial to have a series of counts at different heights of tides (‘through the tide counts’), as some sites are only used on Spring tides and others are only used on Neap and low tides.

For sites in proximity to the Lower Derwent Valley, the surveys should cover different times of day and different flooding states in the valley. For example, during certain winter periods, the designated site may be extensively flooded and therefore usage of surrounding functionally linked land may be higher for wading birds.

The surveys should cover open arable land/grassland and any waterbodies within the proposed site boundary, as well as land adjacent to the development that could be affected

and provides the potential to support designated site species. Where a site is adjacent to the Humber Estuary designated site, additional considerations may be required, for example ensuring adequate surveys of intertidal habitats. Please contact Natural England in such cases.

Surveys may also need to take account of surveys at dusk and dawn, depending upon the bird species (i.e. geese and swans). If geese and swans have the potential to use the development site or surrounding area, we would expect to see surveys 1 hour before and 1 hour after, dusk and dawn during the respective bird survey season (i.e. winter, spring and autumn passage (as above)). These surveys should be in addition to the standard daytime survey but can be carried out on the same day. For example, a dawn survey to count geese or swans at their night-time roost could then extend into a survey of daytime use of fields for foraging.

Natural England generally recommends that observations from vantage points (VP) are used. VP surveys are considered preferable to walkover surveys for observing behaviour of birds on the ground (i.e., whether they are foraging/loafing etc.), and to minimise the risk of flushing birds due to movement of a surveyor during a walkover survey. Also, birds which may otherwise have landed in the field during the survey period may be unlikely to do so with the presence of a moving surveyor. If landscape features mean it is not possible to avoid walking through part of the survey area to get from one point count to another, this should be noted and the reaction of any birds present recorded, including any that are flushed.

Further guidance on vantage point surveys can be found at Recommended bird survey methods to inform impact assessment of onshore windfarms | NatureScot. Natural England recognises that the NatureScot VP guidance is written for impacts associated with wind turbines. However, Natural England considers that the survey guidance detailed in Section 3.7 provides an appropriate methodology to identify distribution and abundance of birds to inform the assessment of other developments. We acknowledge that some of the information regarding the required watch hours and height considerations etc will not be relevant in the context of other developments. Therefore, site-specific considerations should be taken into account when designing the survey methods.

Where VP surveys are not considered appropriate for a particular site, clear reasoning and justification regarding the alternative survey methods undertaken should be provided.

Natural England has generally advised that if ≥1% of a Humber Estuary bird species population could be affected by a proposal, alone or in combination with other plans or projects, then further consideration is required. However, where species are particularly vulnerable due to declines in the Humber population, then it may not be appropriate to rely on the 1% of the estuary population as the critical threshold. Mitigation measures may be required where lower numbers of vulnerable species are using a site that is proposed for development.

Nocturnal surveys

Wader and waterfowl usage of arable land/grassland outside designated sites can be substantially different at night. Therefore, Natural England recommends nocturnal surveys are also carried out if waders and/or waterfowl have the potential to use the development site. These surveys should be in addition to the standard daytime surveys. We recommend that several visits should be completed to determine if the site and/or surrounding areas play a regular role in supporting SPA species at night. Night vision/infra-red equipment and survey on moonlit nights can establish presence of nocturnal species or presence and direction of feeding/migration movements both by calls and by sight[1].

Guidance on nocturnal surveys can be found at Nocturnal bird surveys | Bird Survey Guidelines. The nocturnal survey design should take this guidance into account, and the approach should be justifiable in the assessment. It should be noted that for most species nocturnal activity is likely to be underestimated in any attempted survey[1].

Annex D: Standard Advice for Air Quality Impacts in National Significant Infrastructure Projects (NSIPs)

Natural England provides the following standard advice on air pollution. This advice **Standard Advice for Air Quality Impacts in National 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 NOx)
- 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

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.
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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	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

		APIS Site relevant Critical Loads and Levels (based on literature and professional judgement) http://www.apis.ac.uk/srcl 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.	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 annual averages. 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 alone irrespective of the background levels.
	4b	Apply Screening Threshold In-combination.	Use information from competent authorities (Planning Portal, PINS NSIP register or Environmental Permitting register)

		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.	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 in-combination 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 (AA) for habitats sites	**6**	The competent authority to undertake their AA to conclude 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.	Where mitigation is required to enable a conclusion of no adverse effect on integrity to 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

		Note: If an AA has been undertaken of the proposals alone 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	environmental thresholds for ammonia, nitrogen oxides and nitrogen deposition and has a restore conservation objective.

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 Monitoring[1] 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

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 NOx – 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 (NH_3) that escapes from a selective catalytic reduction (SCR) or selective non-catalytic reduction (SNCR) system used to reduce NOx 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

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16/06/2026

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Infrastructure Decisions and Applications Service
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SL1 4PN

North Lincolnshire Planning Application Reference: DCO/2026/5

Planning Inspectorate Reference: EN0710008

Project: East Coast Hydrogen Humber 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 Northern Gas Networks (the applicant) for an Order granting Development Consent for the East Coast Hydrogen Humber 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: Matthew Gillyon

Thank you for your email dated 19th May 2026 giving North Lincolnshire Council (NLC) the opportunity to comment on the East Coast Hydrogen Humber Pipeline Scoping consultation.

I can confirm that after consultation with our internal technical consultees that North Lincolnshire Council has no comments or objections to raise in respect of the information submitted with the proposed development not likely to result in any significant impact upon North Lincolnshire.

Kind Regards

[redacted]
Matthew Gillyon
Senior Planning Officer
North Lincolnshire Council

NORTH YORKSHIRE
FIRE & RESCUE SERVICE

NYFRS Reference: Premises: 00034063
Job: 1400267

York Fire Station
Kent Street
York
North Yorkshire
YO10 4AH

When telephoning please ask for: S Crossley

Tel: 01904 625272
Fax: 01904 620732

Email: [redacted]@northyorksfire.gov.uk

20 May 2026

Dear Sir or Madam,

Proposed application by Northern Gas Networks (the applicant) for an Order granting Development Consent for the East Coast Hydrogen Humber Pipeline (the proposed development)

Receipt is acknowledged of your planning communication:

Dated: 19 May 2026
Plans No: EN0710008

Your communication has been dealt with as follows:

At this stage in the planning approval process the York and North Yorkshire Combined Authority in its capacity as Fire and Rescue Authority ("YNYCA") have no objection/observation to the proposed development. The YNYCA will make further comment in relation to the suitability of proposed fire safety measures at the time when the building control body submit a statutory Building Regulations consultation to the YNYCA.

The majority of information we collect regarding business fire safety is non-personalised information, however any personal data we collect will be managed in accordance with our Privacy Notice which can be viewed on our website, www.northyorksfire.gov.uk/about-us/data/privacy-policies/.

Under the Regulatory Reform Order 2005 we are obliged to publish a public register of enforcement action which can be viewed via our website, www.northyorksfire.gov.uk/about-us/financial/lists-and-registers/.

Should you require further information please contact the officer whose name appears at the head of the letter.

Yours faithfully,

North Yorkshire Fire & Rescue Service

[redacted]

From: BeforeYouDig <BeforeYouDig@northerngas.co.uk>
Sent: 19 May 2026 15:33
To: East Coast Hydrogen Pipeline – Humber
Cc: BeforeYouDig
Subject: RE: EXT:EN0710008 East Coast Hydrogen Humber Pipeline EIA Notification

Good afternoon,

NGN has a number of gas assets in the vicinity of some of the identified "site development" locations. It is a possibility that some of these sites could be recorded as Major Accident Hazard Pipelines(MAHP), whilst other sites could contain High Pressure gas and as such there are Industry recognised restrictions associated to these installations which would effectively preclude close and certain types of development. The regulations now include "Population Density Restrictions" or limits within certain distances of some of our "HP" assets.

The gas assets mentioned above form part of the Northern Gas Networks "bulk supply" High Pressure Gas Transmission" system and are registered with the HSE as Major Accident Hazard Pipelines.
Any damage or disruption to these assets is likely to give rise to grave safety, environmental and security of supply issues.

NGN would expect you or anyone involved with the site (or any future developer) to take these restrictions into account and apply them as necessary in consultation with ourselves. We would be happy to discuss specific sites further or provide more details at your locations as necessary.

If you give specific site locations, we would be happy to provide gas maps of the area which include the locations of our assets.
(In terms of High Pressure gas pipelines, the routes of our MAHP's have already been lodged with members of the local Council's Planning Department)

Kind regards,

Jennie Adams

Before You Dig
Northern Gas Networks
1st Floor, 1 Emperor Way
Doxford Park
Sunderland
SR3 3XR

Before You Dig: 0800 040 7766 (option 3)
www.northerngasnetworks.co.uk
facebook.com/northerngasnetworks
twitter.com/ngngas
Alternative contact:
beforeyoudig@northerngas.co.uk

[redacted]

From: [redacted]@yorkshirehumberdrainage.gov.uk>
Sent: 15 June 2026 14:00
To: East Coast Hydrogen Pipeline – Humber
Subject: Consultation response

Categories: EST

> You don't often get email from [redacted]@yorkshirehumberdrainage.gov.uk. Learn why this is important

Good afternoon,

I am providing this initial consultation response to the East Coat Hydrogen Humber Pipeline On behalf of Ouse and Humber Drainage Board, which is in our consortium, and South Holderness Internal Drainage Board, to which we provide technical support. Both are Internal Drainage Boards that sit within the proposed development area.

Within IDB districts, watercourses are subject to Land Drainage Byelaws. While we expect these may be set aside by the DCO, we expect the Board's interests to be adequately protected.

As a key principle, it is the Board's policy that any Board-maintained watercourses, which by definition are arterial and serve multiple landowners, should only be crossed using trenchless methods. Shapefiles showing the relevant watercourses are available by request.

At this stage we would like to also provide the following wording that we would suggest as part of any protective provisions for IDBs:

The Development Management Order shall include a protective provision in respect of any cable or pipeline scheme, providing that:

1. *The Internal Drainage Board ("the Board") shall not be under any obligation to notify the operator of [cable or pipeline] of the Board's intention to carry out its routine or normal maintenance operations in the ordinary course of its functions.*

2. *The operator of any such cable or pipeline shall ensure that the design, installation, and protection measures relating to the cable or pipeline are sufficient to prevent damage arising from the Board's normal maintenance and operational activities.*

3. *The operator shall indemnify and keep indemnified the Board against any and all claims, liabilities, losses, damages, and expenses arising out of or in connection with any damage to the cable or pipeline caused by the Board in the exercise of its normal maintenance or operational functions.*

We would encourage the developer to engage with us directly at as early a stage as possible so approaches to watercourse crossings, runoff rates, access roads etc. can be agreed in good time. If you require anything further from us at this stage please let me know.

Kind regards,

Liam

Liam Plater
Senior Development Control Officer

Redcar & Cleveland Borough Council
Corporate Directorate for Growth, Enterprise and Environment
Development Management
Seafield House
Kirkleatham Street
Redcar
TS10 1SP

Email: planning_admin@redcar-cleveland.gov.uk
www.redcar-cleveland.gov.uk/Planning
Direct line01287 612627

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

Our Ref: R/2026/0372/DCO
Your Ref:
Contact: Mr D Pedlow
Date: 5 June 2026

Dear Sir/Madam

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 Northern Gas Networks (the applicant) for an Order granting Development Consent for the East Coast Hydrogen Humber 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 Ref. No. EN0710008**

LOCATION: **East Coast Hydrogen Humber Pipeline**

APPLICANT: **Northern Gas Networks (the applicant)**

Thank you for your consultation received on **19 May 2026**.

I would advise that having considered the detail of the application, we have no comments to make at this point in time.

Yours faithfully

Mr D Pedlow
Development Management Team Leader

Proposed DCO Application by Northern Gas Networks for East Coast Hydrogen Humber 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 13 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:

[redacted]**@royalmail.com), Senior Planning Lawyer, Royal Mail Group Limited**

[redacted]**@struttandparker.com), Strutt & Parker.**

Please can you confirm receipt of this holding statement by Royal Mail.

End

[redacted]

From: Sphere Enquiries <enquiries@sphere-connections.co.uk>
Sent: 29 May 2026 09:04
To: East Coast Hydrogen Pipeline – Humber
Subject: Re: EN0710008 - East Coast Hydrogen Humber Pipeline - EIA Scoping and Consultation

Categories: EST

Hi Molly

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

Sophie

Sophie Sudworth | Head of Asset Management & Operations | Sphere Energy Connect
E: [redacted]@sphere-connections.co.uk | M: [redacted]

Internal Use

From: East Coast Hydrogen Pipeline – Humber <eastcoasthydrogenhumber@planninginspectorate.gov.uk>
Sent: 27 May 2026 16:07
To: Sphere Enquiries <enquiries@sphere-connections.co.uk>
Subject: EN0710008 - East Coast Hydrogen Humber Pipeline - EIA Scoping and Consultation

Dear Sir/Madam

Please see attached correspondence on the proposed East Coast Hydrogen Humber 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.

UK Health Security Agency

Environmental Hazards and Emergencies Department
Seaton House, City Link
London Road
Nottingham, NG2 4LA

nsipconsultations@ukhsa.gov.uk
www.gov.uk/ukhsa

Your Ref: EN0710008
Our Ref: 95200CIRIS

Ms Molly Harvey
Senior Environmental Advisor
The Planning Inspectorate
c/o QUADIENT
69 Buckingham Avenue
Slough SL1 4PN

5th June 2026

Dear Ms Harvey

Nationally Significant Infrastructure Project
EN0710008 East Coast Hydrogen Humber Pipeline
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 make the following comments:

Environmental Public Health

We understand that the promoter will wish to avoid unnecessary duplication and that many issues including air quality, emissions to water, waste, contaminated land etc. will be covered elsewhere in the Environmental Statement (ES). 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*', setting out aspects to be addressed within the Environmental Statement[1]. 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.

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

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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 of the possible impact is included in the ES. For information on carrying out an assessment, please see the document entitled, Advice on the content of Environmental Statements accompanying an application under the NSIP Regime[1]

Yours sincerely,

On behalf of UK Health Security Agency

Please mark any correspondence for the attention of National Infrastructure Planning Administration.

[redacted]

From: Planning <planning@yorkconsort.gov.uk>
Sent: 20 May 2026 10:43
To: East Coast Hydrogen Pipeline – Humber
Cc: Beverley; Bill Symons
Subject: RE: EN0710008 East Coast Hydrogen Humber Pipeline EIA Notification

Dear Sir / Madam,

Thank you for the consultation letter.

I can confirm on behalf of the below Boards that the red line boundary does not fall within our drainage districts and therefore we have no comments and do not need to be consulted again if the red line boundary remains the same:

- Ainsty (2008) Internal Drainage Board
- Foss (2008) Internal Drainage Board
- Ouse & Derwent Internal Drainage Board
- Airedale Drainage Commissioners

The proposal does fall partly within the district of our Beverley & North Holderness Internal Drainage Board. A separate response will be sent on this.

Any future correspondence should be sent to: beverley@yorkconsort.gov.uk

Please do not hesitate to contact me if you require anything further.

Kind regards,

Charlotte Gill

Senior Planning Officer

Working Hours: **Monday, Tuesday, Wednesday and Thursday – 8.45am to 2.15pm**

If you would like to understand more about what Internal Drainage Boards do, we would recommend this short video - Youtube Video on IDBs

York Consortium Drainage Boards

Airedale Drainage Commissioners
Ainsty (2008) Internal Drainage Board
Beverley & North Holderness Internal Drainage Board
Foss (2008) Internal Drainage Board
Ouse & Derwent Internal Drainage Board

Address: Derwent House | Crockey Hill | York | YO19 4SR

E-mail: planning@yorkconsort.gov.uk

Telephone: [redacted]

[redacted]

From: [redacted]@yorkshiredales.org.uk>
Sent: 20 May 2026 17:34
To: East Coast Hydrogen Pipeline – Humber
Subject: RE: EN0710008 East Coast Hydrogen Humber Pipeline EIA Notification

You don't often get email from martyn.coy@yorkshiredales.org.uk. Learn why this is important

Dear Mr Jones

Thank you for contacting the Authority on this matter.

We have reviewed the proposed development and consider that it will not impact on the Yorkshire Dales National Park. Therefore, we do not need to be consulted on this Appliucation.

Yours sincerely

Martyn

Martyn Coy RTPI
Principal Planner
[redacted]
www.yorkshiredales.org.uk
Yorkshire Dales National Park Authority
Yoredale | Bainbridge | Leyburn
North Yorkshire | DL8 3EL

From: East Coast Hydrogen Pipeline – Humber <eastcoasthydrogenhumber@planninginspectorate.gov.uk>
Sent: 19 May 2026 15:11
Subject: EN0710008 East Coast Hydrogen Humber Pipeline EIA Notification

You don't often get email from eastcoasthydrogenhumber@planninginspectorate.gov.uk. Learn why this is important

CAUTION: This email originated from outside of the authority. Do not click links or open attachments unless you recognise the sender and know the content is safe.

FAO Head of Planning

Dear Sir/Madam

Please see attached correspondence on the proposed East Coast Hydrogen Humber 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.