



Hull
City Council

The Planning Inspectorate
Environmental Services
Infrastructure Decisions and
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Planning Inspectorate
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Date: 26th 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

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

Thank you for consulting Hull City Council and inviting comments on the request for a Scoping Opinion in connection with the above project.

The Council wishes to reiterate its support for the development of renewable and low-carbon hydrogen technologies in general terms, particularly in light of both the City's economic, and HEYCA's Local Growth Plan priorities.

Please see detailed feedback on the submitted Scoping Report below:



Economic Development & Regeneration Directorate, The Guildhall,
Alfred Gelder Street, Hull, HU1 2AA

8.2 Air Quality

The rationale behind the inclusion of the East Riding of Yorkshire settlements of Wyton Bilton, Wawne, and Skidby in parentheses after Kingston-Upon-Hull in the context of residential receptors at 3.3.24 is not understood. Both areas of the city, and of the ERYC settlements listed, appear to be within the defined study area, but should be identified separately.

HCC is of the view that greater consideration should be given to air quality during the operational phase, particularly with regard to flaring exercises given proximity to sensitive residential receptors. Paragraph 4.2.8 refers to flaring being undertaken in emergency circumstances and being of limited duration, but without any indication of the predicted frequency of such events, or how 'limited duration' is quantified. Experience of industrial installations within or in relative proximity to the city boundary suggests that such episodes can be relatively protracted.

Section 8.2 on Air Quality goes on to state that the flaring will result in the emission of NO_x, a pollutant for which Hull City Council routinely undertakes monitoring in respect of air quality. Whilst the Section describes the envisaged operational emissions as trivial, there is an absence of detail with regard to predicted levels, duration, or planned mitigation.

Paragraph 4.2.18 also states that

'The need for either vent or flare stacks is subject to ongoing design development and will be confirmed as the Application progresses, with effects assessed in the ES',

and Section 8.6 on Greenhouse Gasses:

'Potential GHG emissions associated with venting/ flaring would be assessed in the ES that accompanies the Application based on anticipated use/ design parameters',

whereas Section 8.2 proposes that operational phase emissions are scoped out of the ES.

Given the absence of certainty, consistency, and detail surrounding this particular issue, HCC do not currently agree that operational phase emissions should be scoped out of the assessment.

The scoping report recognises that construction/traffic movements associated with the development have the potential to impact upon air quality, through trips associated with materials delivery, plant, and machinery, as well as construction staff traffic. The inclusion of the local highway network within the Hull City Council administrative area is welcomed.

Whilst it is appreciated that detailed construction traffic information is not yet available, and that that is likely to include the source and routing of construction traffic associated with delivery of materials of construction, it is recognised that, not least given its relative proximity, the Port of Hull is likely to represent a short-list option for any required import. It will therefore be important that any air quality impacts from the proposed development, and any cumulative impacts associated with a number of proposed, in-process, and consented infrastructure projects in and around Hull and the East Riding authority areas are captured if and where possible.

It is recommended that the Air Quality Assessment and assessment of significance of impacts is undertaken with regard to the Air Quality guidance contained within Hull City Council Supplementary Planning Document 3 – Environmental Quality.

8.3 Biodiversity and Ecology

The Scoping Report provides a broadly sound framework for the preparation of the Environmental Statement.

The future baseline should account for natural environmental change, climate-related influences, and the effects of nearby or proposed development, where habitat condition, species presence, and ecological connectivity may change over time, and should also consider how mitigation measures may influence environmental conditions once established.

Ecological study areas should extend beyond the Order Limits where necessary to capture functional relationships, such as species movement and hydrological connectivity. The ES should clearly define these spatial and temporal parameters and explain how they relate to identified receptors and pathways. Consideration should be given to later construction start dates where these could materially alter baseline conditions or impact pathways.

Cumulative effects assessment will be important given the interconnected nature of habitats and species populations, with a clear focus on shared receptors such as ecological networks, water environments, and designated sites. In relation to the Humber Estuary and surrounding habitats, in-combination effects are likely to be a key consideration and should be fully integrated into the assessment.

The ES should clearly identify any assumptions, limitations, and uncertainties within the assessment. This is particularly relevant where survey coverage is incomplete, where surveys are undertaken post-scoping, or where design parameters remain flexible. Monitoring should be proposed where mitigation effectiveness is uncertain or where long-term management is required to achieve intended outcomes. This is especially relevant for habitat reinstatement, biodiversity net gain delivery, and species-specific mitigation measures.

The proposed development has the potential to affect a wide range of ecological receptors. At this stage, the ecological assessment appears to rely heavily on desk-based information, and therefore a precautionary approach is necessary until comprehensive field survey data becomes available.

A number of key ecological risks are evident at the scoping stage. These include the proximity of the route to the Humber Estuary SPA, SAC and Ramsar site, and the potential for impacts on any functionally linked land used by qualifying bird species. The presence of designated likely Local Wildlife Sites within or adjacent to the scoping boundary is also a notable constraint.

The ES should be supported by a robust and up-to-date ecological baseline. This should include a Preliminary Ecological Appraisal, UK Habitat Classification survey, up-to-date biological records, and a full programme of protected species surveys undertaken at appropriate times of year. Where relevant, aquatic ecology and ornithological surveys should also be included.

The ES should demonstrate how route selection and refinement have sought to avoid designated sites, irreplaceable habitats, priority habitats, woodland, hedgerows, veteran trees, riparian corridors, and other sensitive ecological features. Where impacts cannot be avoided, this should be clearly justified, with a transparent explanation of why alternative options are not feasible.

The ES should include a comprehensive construction-phase ecological mitigation strategy, addressing habitat protection, pollution prevention, timing restrictions, watercourse protection, lighting control, and ecological supervision.

The approach to reinstatement and restoration should also be clearly defined. In the longer term, a clear strategy for habitat management, restoration, and enhancement should be set out. This should include proposals for biodiversity net gain where applicable, supported by management plans and monitoring to ensure delivery over time.

Although operational effects may be limited due to the buried nature of the pipeline, the ES should still address potential impacts associated with maintenance and easement management, including vegetation control and constraints on habitat establishment. The assumption that decommissioning effects can be scoped out on the basis that the pipeline will remain in situ is acceptable in principle.

Ongoing engagement will be important as the scheme develops to ensure that ecological considerations are appropriately integrated into the evolving design and mitigation strategy.

8.4 Climate Change and Resilience

The LPA has no observations to raise with regard to the content of this section of the Scoping Report.

8.5 Cultural Heritage

The scoping exercise for above ground heritage assets within the city boundary is considered acceptable.

With regard to below ground heritage assets, as noted in paragraph 8.5.1 of the Scoping Report, a search of the Historic Environment Record has not been carried out, 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 to be suitable for obtaining sufficient baseline information to assess the archaeological potential of the site.

8.6 Greenhouse Gases

The LPA has no observations to raise with regard to the content of this section of the Scoping Report.

8.7 Ground Conditions

The LPA has no observations to raise with regard to the content of this section of the Scoping Report.

8.8 Landscape and Visual Amenity

The LPA has no observations to raise with regard to the content of this section of the Scoping Report.

8.9 Major Accidents and Disasters

The LPA has no observations to raise with regard to the content of this section of the Scoping Report.

8.10 Material Assets and Wastes

The LPA has no observations to raise with regard to the content of this Section of the Scoping Report.

8.11 Noise and Vibration

The rationale behind the inclusion of the East Riding of Yorkshire settlements of Wyton Bilton, Wawne, and Skidby in parentheses after Kingston-Upon-Hull in the context of residential receptors at 3.3.24 is not understood. Both areas of the city, and areas of the ERYC settlements listed appear to be within the defined study area, but should be identified separately.

Construction traffic may be routed along the Strategic Road Network and local highway network within the Hull City Council administrative area, and assessment of potential noise and vibration impact on sensitive receptors, and identification of appropriate mitigation measures should be undertaken, including temporal controls and appropriate monitoring.

Experience of flaring exercises at other nearby industrial installations includes incidence of significant audible impact over quite some distance, and in excess of the Study Area proposed on p.167 to the Scoping Report.

8.12 Socio-Economics

For clarity, the receptor at Wawne Primary School, identified in the table on page 175 to the scoping report, is within the settlement and East Riding of Yorkshire parish of Wawne, and not within Kingswood, the latter being a residential estate within Kingston upon Hull, and not a settlement in its own right.

HCC Residential Allocations identified in the table on p.176 have in fact already been developed.

8.13 Soils and Agricultural Land

The LPA has no observations to raise with regard to the content of this section of the scoping report.

8.14 Transport and Movement

The A1033 also forms part of the Strategic Road Network, following on from the A63 where it meets Southcoates Roundabout from the west.

The CTMP and CWMP are both within scope. Origin of construction materials and where excavated materials are being taken, volume of traffic, breakdown of vehicle type, where, when the increased traffic will be on the network, are key.

Junctions which are at or close to capacity can be significantly impacted by relatively small increases in traffic volumes, with resultant air quality implications also. Links and sensitive junctions within scope will need to be subject of discussion with the local highway authority.

The influence of the only very recently opened A63 Castle Street Improvement Scheme on the current baseline should be taken into account.

The timing of the construction phase will also be important in the context of other schemes that are also in delivery on the HCC local network and related diversion routes.

Depending upon traffic flows and timings, any potential impact on abnormal load routes will need to be considered.

Further information will be needed about impact on the cycle route to Hornsea with regard to mitigation measures as part of further work proposed to be undertaken.

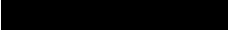
Impact of potential rail disruption will also need to be assessed understood on the Hull-Leeds and Hull-Beverley lines. Whilst the points of disruption sit beyond the HCC administrative area, any disruption will be experienced within the city boundary.

8.15 Water Resources and Flood Risk

Attention is drawn to the Hull City Council Strategic Flood Risk Assessment (December 2016).

The scope positively mentions that access tracks will be constructed with permeable surfacing where possible, but there is no reference made to the incorporation of SuDS into elements of above ground development such as AGI, PRI, and BVS.

Yours sincerely


Principal Development Management Officer