

From: [REDACTED]@eastriding.gov.uk>
Sent: 22 June 2026 09:18
To: East Coast Hydrogen Pipeline – Humber
Subject: Scoping opinion additional comments

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Dear Sirs

Further to the East Riding of Yorkshire Council comments on the scoping report sent on 16th June, please find additional comments from our ecology officer:-

East Coast Humber Hydrogen Pipeline EIA Scoping Report Biodiversity and Ecology

Agree with the scoping in of Ecology and Biodiversity into the Environmental Statement (ES)

With regards the study area, for Statutory designated sites (SSSI, NNR and LNR) the study area is detailed as 'within 2km of the Scoping Boundary'. We would ask that for SSSI this is adapted according to the SSSI Impact Risk Zone as detailed on magic.gov.uk. this can be up to 5km.

We support the production of a Habitats Regulations Assessment alongside the ES.

Passage birds as well as wintering birds should be included for assessment.

Design Principals in relation to ecology, biodiversity and tree are supported.

Baseline data on fish may be sources from the Environment Agency and contact with the East Yorkshire Bat Group is encouraged in relation to relevant bat records.

We support the delivery of biodiversity net gains in accordance with expected guidance and legal requirements.

Regards

[REDACTED]
Principal Planning Officer
East Riding of Yorkshire Council

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Conservation Team Comments

Site: East Coast Hydrogen Humber Pipeline

Application Reference:

The applicant has produced a scoping report relating to the proposed East Coast Hydrogen Humber Pipeline. This proposes to upgrade and supplement the existing gas network to allow for the transfer of hydrogen. This development will follow a corridor along the north side of the Humber, from near Hedon in the east to Knottingley in the west. Due to the length, diameter and pressure of the proposed pipeline, it is considered to be a Nationally Significant Infrastructure Project. The impact on Cultural Heritage is considered in section 8.5 of the Scoping Report.

Within this section the applicant has set out the proposed extent of the study area to be considered when producing the heritage chapter. This is proposed to be 1km from the pipeline for designated heritage assets, and 500m for non-designated heritage assets. This is comparatively smaller than the scope of the study area of a number of other NSIPs. However, the applicant has justified the relatively contained nature of this scope by noting that the pipeline will be subterranean, with the above ground impact limited solely to the smaller radius in which the construction works will be appreciable. We would accept this supposition.

However, it is noted that the chapter refers to the potential for above ground infrastructure which will be in place throughout the full period of operation, for venting and flaring. As the scale, siting, design and quantum of this infrastructure is still undefined, it is not possible to definitively agree that 1km is a sufficient search area. This is because we do not currently know the scale of the infrastructure which might be required, and therefore we also do not know the theoretical radius in which its impact might be felt on the historic environment. However, should such infrastructure not be required, we would agree that the proposed search area is sufficient to allow for an understand of the full impact of the development on the above ground heritage.

It is also noted that no information in relation to the location of site compounds has been provided. Given that these are often areas of more intense operation, there is a potential that heritage assets located within the immediate area of these compounds during the construction phase will be more greatly affected. We would therefore recommend that particular focus is given to the assessment of the heritage assets within the immediate vicinity of these compounds, when their siting is known, in order to ensure that the impact on the significance of these assets is fully understood.

The methodology to be utilised in the EIA to assess the effect of the development on heritage assets is one that is consistent with the methodology used for other similar large infrastructure projects. It is therefore agreed to be appropriate. However, it is highlighted that this is a methodology that has been developed to cover a wide range of potential projects. This makes it a high-level process, that can lack specificity to the development being assessed if applied without nuance. In particular, it is centred on a matrix of 'asset value' and 'magnitude of impact'. This matrix can result in generic and blanket conclusions about assets of the same designation, which do not reflect these assets' varying importance and character, if applied without nuanced discretion. It is therefore positive to see that the applicant notes on page 96 of the Scoping Report that each asset will be assessed on an individual basis, using professional judgement. We are

also content that the baseline data collection proposed to support this assessment is sufficient to be able to allow for a robust assessment.

It is also noted that the effects of the decommissioning of the development on heritage assets are to be scoped out of the EIA. This is not objectionable in principle, as it is accepted that the impact of decommissioning often matches those of construction, and that it is unlikely to be greater than the effects caused at the construction and operation phases of the development. However, this conclusion assumes that the project's decommissioning phase will follow a similar process as other similar projects, and we would therefore revise this assessment should this assumption prove to be incorrect.

It is also noted that the effects of the development during the operational stage is proposed to be scoped out of the report, if a 'routine operation' is proposed, but scoped in if 'flare/vent stacks' are required. This is acceptable in principle, but it requires a confirmation of which option will be progressed prior to the writing of the EIA. Should both options remain possible at the time of preparing the EIA chapter on heritage, we would want to see the author consider the 'worst case scenario', meaning that the effect of above ground infrastructure at its greatest possible extent and massing should be assessed as part of this chapter.

We therefore do not have concerns regarding the majority the scope and methodology which has been proposed within this Scoping Report. However, the lack of surety and clarity in relation to the flaring and venting infrastructure which may be required as part of the development means that we cannot at this juncture be completely confident that the proposed scope of assessment will be sufficient. It is recommended that the need for this infrastructure be determined prior to the writing of the EIA, or that any heritage assessment is based on the 'worst case' potential scenario. This should therefore assess the infrastructure at the largest massing and greatest quantum which may be required. If this infrastructure is particularly tall or considerable in massing, a larger study area may be needed than 1km. The extent of this area could, however, be informed by a ZTV, or the findings of an LVIA.

This response does not consider the impact of the proposals on archaeology, or the acceptability or completeness of the proposed methodology for assessing assets of archaeological significance. We would therefore recommend that this response is read alongside the response provided by the council's archaeological advisor.

RB 26.06.2026