



SCOPING OPINION:

East Coast Hydrogen Pipeline - Teesside

Case Reference: EN0710010

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

06 July 2026

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1. INTRODUCTION

- 1.0.1 On 28 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 Teesside 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/EN0710010/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’](#) 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 Section 4)

ID	Ref	Description	Inspectorate's comments
2.1.1	Paragraph 4.2.11	Trenchless crossings methods - Horizontal directional drilling (HDD)	<p>It is understood that the Proposed Development will require a crossing of the River Tees and Greatham Creek/ Seaton on Tees Channel. It is not known at this stage whether the crossings would be via an existing pipe bridge or a new crossing below the river bed of Greatham Creek. The crossing of the Tees would be either via an existing tunnel or a new crossing below the river bed.</p> <p>Though the crossing methods are yet to be determined, the Scoping Report does detail that HDD will be considered as an alternative trenchless crossing method. Where selected, it is understood that this introduces a risk of drilling fluid being released. The Environment Agency (EA) (see appendix 2 of this Opinion) advise that the applicant should produce a drilling fluid breakout plan to mitigate risks associated with drilling fluids. These should be secured under the CEMP and informed by ground investigation data. In addition, the EA recommends that crossing-specific Hydrogeological Risk Assessments should be provided for all trenchless crossings. The ES should describe how any relevant avoidance and mitigation measures will be secured through the dDCO.</p> <p>If any HDD is planned to take place close to or underneath any watercourse or woodland, the ES should also provide a full assessment of the potential impacts of changes to groundwater levels and qualities, and detail how any relevant avoidance and mitigation measures will be secured through the</p>

ID	Ref	Description	Inspectorate's comments
			dDCO. The applicant's attention is directed towards comments (see appendix 2 of this Opinion) from the Forestry Commission in this regard.
2.1.2	Paragraphs 4.2.17 and 4.2.22	Above Ground Installations (AGI)	The Scoping Report provides indicative dimensions and locations for AGI, including Pressure Reduction Installations (PRI), Block Valves Stations (BVS), and temporary construction compounds (TCC). It does not however define the number, distribution, or cumulative land take of all above ground elements. Further clarity will be required in the ES on the extent of this infrastructure in order to understand the potential effects on all relevant environmental aspects.
2.1.3	Paragraph 4.2.23	Emergency stacks	The Scoping Report details that emergency stacks of up to 15 metres above ground level may be required. Should the dDCO provide for emergency stacks, further clarity will be required in the ES on the number, dimensions, and use of the stacks, which should inform assessments such as landscape, heritage, biodiversity, and air quality aspect assessments. The Inspectorate considers that the inclusion of photomontages would aid understanding of potential impacts.
2.1.4	Paragraph 4.2.29	Marker posts	The Scoping Report details that marker posts will be positioned 'where practicable' to minimise effects on existing land uses. Other than a metre square of land required around each post, no detail is provided on the actual size or anticipated location of the marker posts. Further clarity will be required in the ES to detail the assessment of the potential effects, once the final number, siting, and specification of marker posts is confirmed.
2.1.5	Section 4.4	Flexibility	The Inspectorate notes the applicant's intention to apply a 'Rochdale Envelope' approach to maintain flexibility within the design of the Proposed

ID	Ref	Description	Inspectorate's comments
			<p>Development. The Inspectorate expects that at the point an application is made, the description of the proposed development will be sufficiently detailed to include the design, size, and locations of the different elements or, where details are not yet known, the ES will set out the assumptions applied to the assessment in relation to these aspects. This should include the land-use requirements for all elements and phases of the development. The description should be supported as necessary by figures, cross-sections, and drawings which should be clearly and appropriately referenced.</p> <p>Where flexibility is sought, the ES should clearly set out and justify the maximum design parameters that would apply for each option assessed, and how these have been used to inform an adequate assessment in the ES.</p> <p>The Inspectorate advises that each aspect chapter includes a section that outlines the relevant parameters/ commitments that have informed the assessment.</p>
2.1.6	Section 4.6	Construction phasing	<p>It is understood that construction of the proposed development is anticipated to take around 4 years to complete. Further clarity will be required in the ES to detail the phasing of stages, so that the duration and timing of the work can be understood by the relevant authorities.</p>
2.1.7	Paragraph 4.10.2	Maintenance activities	<p>The Scoping Report describes the inspection and maintenance activities which would take place during the operational phase. Paragraph 4.10.3 states 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. The ES should provide details on what remedial actions would include, for example, excavation of the pipeline.</p>

ID	Ref	Description	Inspectorate's comments
			<p>The ES should also provide an indicative schedule for scheduled preventative maintenance activities during the operational phase. Whilst it is understood that corrective maintenance cannot be predicted, the ES should provide details of any anticipated corrective maintenance activities, including the likely frequency, duration, and equipment required and traffic movements, based on experience from similar projects. Should corrective or preventative maintenance activities be anticipated to be of a similar scale to construction phase activities, the ES should include an assessment of likely significant effects. Avoidance and mitigation measures akin to those proposed for the construction phase should be committed to.</p>
2.1.8	Section 4.11	Decommissioning activities - above ground pipeline	<p>The Scoping Report proposes to scope out many aspects from assessment within the ES, on the basis that the pipeline will remain in-situ at decommissioning. Paragraph 4.11.2 states that the pipeline would be decommissioned safely and left in-situ but subsequently states that "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."</p> <p>The Scoping Report on pages 92 to 97, pages 187 and 217 also makes reference to sections of above ground pipeline, which may need to be removed.</p> <p>Whilst it is understood that the majority of the pipeline would be underground and will remain in-situ, there is insufficient detail provided at this stage to understand the extent and location of pipeline sections that would be located above ground. It is therefore not possible to scope out the matters that rely on no significant effect, due to pipeline remaining in-situ, because the extent and locations of above ground pipeline is unclear. The ES should adopt a</p>

ID	Ref	Description	Inspectorate's comments
			<p>reasonable worst-case scenario where any uncertainty remains to ensure an accurate assessment.</p> <p>If the 'link line' which is described in footnote 7 as "a pipeline corridor that was historically installed across Teesside to connect the former ICI plants at Billingham and Wilton. The pipeline corridor is predominantly above ground and provides a functional connection between major industrial users", along with the pipe bridge crossing at Greatham Creek/ Seaton on Tees, described in paragraph 4.2.12 are the only possible above ground sections of pipeline, then this should be clarified within the ES with a LSE assessment.</p> <p>The Scoping Report states that an outline Decommissioning Environmental Management Plan (DEMP) would accompany the DCO application. It is considered that the ES should provide a description of likely decommissioning activities and the avoidance and mitigation measures to be employed, including the anticipated duration of works during the decommissioning phase. The ES should provide clarification regarding which elements may be removed or left in-situ during decommissioning. 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.</p> <p>The ES should also include the anticipated vehicle movements as well as estimates of the type and quantity of waste at the point of decommissioning and address the likely significant effects from waste at decommissioning to the extent possible at this time, including consideration of any measures to ensure that component waste will avoid entering the waste chain.</p>

ID	Ref	Description	Inspectorate's comments
2.1.9	n/a	Depth of pipeline	<p>The ES should describe the range of depths that have been considered as part of the assessment and the degree of confidence in those parameters. Parameters should be established based on a reasonable worst-case scenario to determine likely significant effects. The applicant's attention is drawn to comments from National Gas Networks (see appendix 2 of this Opinion) with regards to agreement required over safe pipeline working depths and distances from existing pipelines, and the Environment Agency's comments (see appendix 2 of this Opinion) concerning detail required on potential pipeline depth at which construction related impacts may occur.</p>
2.1.10	n/a	Thermal effects	<p>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 development infrastructure. Where a pathway exists, the ES should include an assessment of LSEs.</p>

2.2 EIA Methodology and Scope of Assessment

(Scoping Report Section 7)

ID	Ref	Description	Inspectorate's comments
2.2.1	Section 5	Alternatives	As the final design and locations of elements of the proposed development are not yet confirmed, the ES should explain how the design of the proposed development has evolved in response to environmental constraints and feedback from relevant consultation bodies. The ES should also demonstrate how the final design has fully applied the mitigation hierarchy.
2.2.2	n/a	Residues and emissions	The ES should provide an estimate, by type and quantity, of anticipated residues and emissions resulting from construction and operation of the proposed development, as required by Schedule 4(1)(d) of the EIA Regulations 2017. This should include those from waste streams, emissions to air (for example dust, greenhouse gas emissions), discharges to water, lighting, noise/vibration, and any operational releases (e.g. venting, flaring). The Scoping Report does not explicitly define air emissions, water discharges and soil contamination pathways which will need to be presented within the ES alongside an appropriate assessment of LSEs.
2.2.3	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

ID	Ref	Description	Inspectorate's comments
			relevant stakeholders and the ES should explain how they would be secured through the dDCO.
2.2.4	n/a	Forecasting methods or evidence	The rationale for scoping in and out aspects from assessment within the ES is often high level without a clear evidence-based justification. This often does not include supporting data, or relevant thresholds, to support the conclusion. This data will be required to be appropriately presented within the ES.
2.2.5	n/a	Report formatting - paragraph numbering	The Scoping Report does not contain comprehensive paragraph numbering. It is recommended that the ES contains full paragraph numbering, this is to support accurate referencing during examination. Appendices to the ES must be clearly referenced, again with all paragraphs numbered. All figures and drawings, photographs, and photomontages should be clearly referenced. Figures should clearly depict the proposed development site boundary, including any associated development.
2.2.6	Appendix A	Cumulative effects assessment (CEA)	<p>The ES should fully justify the study area for identifying cumulative sites with reference to relevant guidance and the likely extent of impacts. The ES should provide a clear justification for the extent of each Zone of Influence and how this captures the effects from the proposed development.</p> <p>The applicant's attention is drawn to comments from Alfanar Energy Ltd, National Gas Transmission, Natural England and Sembcorp Energy UK Ltd (see appendix 2 of this Opinion) with regards to those developments that will need to be taken into account in in the CEA. In addition, Durham County Council have</p>

ID	Ref	Description	Inspectorate's comments
			noted two additional proposed NSIP developments which are not listed in the CEA stage and activities Table A-1 list of the Scoping Report. The Inspectorate considers that these developments should be included within the CEA.
2.2.7	Appendix L	Glossary – proposed development	The glossary states that the pipeline would be approximately 20km in length. The Inspectorate assumes that this is a typographical error.
2.2.8	Section 7.7	Transboundary	<p>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.</p> <p>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.</p> <p>Note: The SoS' duty under regulation 32 of the 2017 EIA Regulations continues throughout the application process.</p> <p>The Inspectorate's screening of transboundary issues is based on the relevant considerations specified in the annex to its</p>

ID	Ref	Description	Inspectorate's comments
			Advice Page 'Nationally Significant Infrastructure Projects: Advice on Transboundary Impacts and Process', links for which can be found in paragraph 1.0.7 above.
2.2.9	n/a	Cross-referencing to other aspect chapters	Where there is potential for combined effects between different aspects this should be clearly cross referenced between the relevant ES aspect chapters.

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	Page 65, Section 8.2	Dust emissions: pipeline and AGI - decommissioning	<p>The rationale for scoping out dust emissions during the decommissioning phase is on the basis that the pipeline will remain in-situ. The Scoping Report states on page 64 that mitigation measures would be included within a separate DEMP. The Inspectorate considers that there is insufficient evidence to demonstrate why significant effects would be unlikely to occur at the decommissioning phase, see ID 2.0.8 above, and as such does not agree to scope out dust emission impacts from decommissioning phase.</p>
3.1.2	Page 66, Section 8.2	Vehicle Movements: pipeline and AGI - operational	<p>The Scoping Report states that due to the nature of the proposed development, operational traffic effects are expected to be negligible. A qualitative assessment is proposed instead. Page 64 states that the ES will include an estimate of operational traffic to demonstrate that effects would not exceed the Institute of Air Quality Management (IAQM) screening thresholds.</p> <p>The ES should confirm the vehicle types and likely number and routing of vehicle movements required for operation and maintenance of the proposed development. Provided these do not exceed the screening thresholds set out in the IAQM guidelines, the Inspectorate agrees that significant effects on air quality are not likely and that this matter can be scoped out of the ES. If such confirmation is not possible, an assessment should be provided of LSE on air</p>

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			quality. The Inspectorate directs the applicant's attention to ID 2.0.7 of this Opinion in relation to the assessment of effects from maintenance activities.
3.1.3	Page 66, Section 8.2	Vehicle Movements: pipeline and AGI – decommissioning	Decommissioning effects are proposed to be scoped out on the basis that effects from decommissioning are likely to be less than those at the construction phase, with only AGI being deconstructed. Page 64 details that relevant mitigation measures to reduce any potential adverse impacts would be included within the DEMP. The ES should confirm the vehicle types and likely number and routing of vehicle movements required for decommissioning of the proposed development. Provided these do not exceed the screening thresholds set out in the IAQM guidelines, the Inspectorate agrees that this matter can be scoped out of the ES. If such confirmation is not possible, an assessment should be provided of LSE on air quality.
3.1.4	Page 66, Section 8.2	Operational phase emissions	The Inspectorate considers that insufficient information regarding the extent, duration and frequency of proposed activities in the operational and maintenance phase has been provided in order to confirm the absence of a significant effect. As stated on page 63 for example, venting/ flaring at the AGI would release emissions, which warrants further assessment. As such the Inspectorate does not agree to scope this matter out of the ES. If uncertainty exists at the point of assessment, then the assessment should be based on a reasonable worst-case scenario.

ID	Ref	Description	Inspectorate's comments
3.1.5	Page 62, Section 8.2	Study area	The ES should also include a figure(s) that depicts the study area, air quality monitoring sites used to inform the assessment, and the sensitive human and ecological receptors considered.
3.1.6	n/a	Guidance	The applicant's attention is drawn to the Defra advice 'PM2.5 Targets: Interim Planning Guidance'. The ES should explain how key sources of air pollution within the proposed development have been identified and how action has been taken to minimise emissions of PM2.5 or its precursors.

3.2 Biodiversity and ecology

(Scoping Report Section 8.3)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.2.1	Pages 76 -77, Section 8.3	<p>Potential impact of the pipeline during operation and decommissioning on:</p> <ul style="list-style-type: none"> • European Statutory designated sites • National Statutory designated sites • Non-statutory designated sites • Irreplaceable habitats • Priority habitats • Hedgerow • Breeding birds 	<p>The Inspectorate considers that insufficient information regarding the extent, duration and frequency of proposed activities in the operational and maintenance phase has been provided in order to confirm the absence of a significant effect. As such the Inspectorate does not agree to scope this matter out of the ES. The Inspectorate directs the applicant's attention to ID 2.0.7 of this Opinion in relation to the assessment of effects from maintenance activities.</p> <p>With regards to impacts from the decommissioning phase, the Scoping Report states that the pipeline will remain in-situ and therefore impacts can be scoped out on this basis. However, as noted in ID 2.0.8, there is uncertainty over the extent and locations of any above ground pipeline. The Inspectorate therefore does not agree to scope out these matters during the decommissioning phase. The ES will need to demonstrate that any above ground asset removal is limited and controllable via the DEMP and would lead to no LSE on those ecological features described in the Scoping Report.</p> <p>The applicant's attention is directed to comments from Natural England (see appendix 2 of this Opinion) which state that it disagrees that any effects from operation and decommissioning phase are capable of being scoped out, due to insufficient information provided at this stage.</p>

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
		<ul style="list-style-type: none"> • Wintering birds • Amphibians, including GCN • Bats • Badger • Otter and water vole • Reptiles • Terrestrial invertebrates • Aquatic ecology • Other mammals 	

ID	Ref	Description	Inspectorate's comments
3.2.2	Page 72, Section 8.3	Great crested newts (GCN) District Level Licencing (DLL)	<p>The Scoping Report states that there are GCN licence records within the scoping boundary with DLL in the study area. 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</p>

ID	Ref	Description	Inspectorate's comments
			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.
3.2.3	Page 75, Section 8.3	Design principles – buffers and separation distances	The Scoping Report outlines the embedded mitigation and appropriate buffer distances with measures embedded 'as far as reasonably practicable' to avoid LSE. The ES will need to confirm the minimum buffer/ separation distances which will need to be applied flexibly to account for local circumstances, and timing of works to avoid any LSE on all potentially affected habitats and species. These distances should be agreed with relevant stakeholders. The applicant's attention is directed towards comments from the Forestry Commission (see appendix 2 of this Opinion) that buffer zones should vary depending on the scale and type of development and its effect on ancient woodland, ancient trees and veteran trees, and the character of the surrounding area.
3.2.4	Page 78, Section 8.3	Preliminary Ecological Appraisal (PEA)– survey area	The proposed PEA study area comprises the scoping boundary with an additional survey buffer and species-specific extensions. The Inspectorate considers this to be appropriate and consistent with industry practice for a linear infrastructure project at scoping stage. The use of a precautionary corridor approach is supported. However, the boundary will need to be refined and, where necessary, extended as the design evolves to ensure all temporary and permanent land take, as well as relevant ecological receptors, are fully captured.
3.2.5	Page 32,	Ancient woodlands (AW)	The Scoping Report details that irreplaceable habitat will be retained through micro-siting/ design, unless their loss is unavoidable. If it is identified that the proposed development will lead to any loss of irreplaceable habitat, then it

ID	Ref	Description	Inspectorate's comments
	Section 4		<p>must be demonstrated that wholly exceptional circumstances have led to the loss and that a suitable compensation strategy exists. Robust evidence will need to be provided in the ES that all possible alternatives have been assessed and discounted. The applicant's attention is directed towards comments from the Forestry Commission (see appendix 2 of this Opinion) in this regard and to comments from Durham County Council which recommend for accuracy purposes, the use of its AW inventory rather than using the national dataset.</p> <p>The applicant's attention is also directed towards comments from Natural England which detail uncertainty over whether the Skelton Beck Complex Local Wildlife Site can be avoided by routing or by going underneath the woodland. The routing will need to be clarified and justified in the ES.</p>
3.2.6	n/a	Ecological surveying	<p>The applicant's attention is drawn to comments from Natural England (see appendix 2 of this Opinion) which advise that ornithological survey methodologies must reflect seasonal variations and appropriately assess potential zones of influence – specifically regarding noise and visual disturbance, extending beyond the draft Order Limits. The applicant should ensure that two years of survey data is available from within the last three years to ensure the dataset is robust. Survey data may be supplemented by surveys undertaken for other projects in the vicinity and could be reduced if survey counts are increased. Survey counts should include high and low tide bi-monthly counts.</p>
3.2.7	n/a	Plants, fungi, and lichens	<p>The Scoping Report does not identify any protected plant, fungi, or lichen species, for example those listed under Schedule 5 of the Conservation of Habitats and Species Regulations 2017 and Schedule 8 of the Wildlife and Countryside Act 1981, nor plant, fungi, or lichen species that are listed under s41 of the Natural Environment and Rural Communities Act 2006 as 'Species of</p>

ID	Ref	Description	Inspectorate's comments
			<p>Principal Importance'. The need for more detailed botanical surveys should be discussed and agreed with relevant consultation bodies.</p> <p>The ES should confirm the presence or absence of such protected/ important species and provide an assessment of effects on the species, where significant effects are likely. Any avoidance, mitigation, or compensation measures for such species should be agreed, where possible, with relevant consultation bodies and the ES should explain how they would be secured through the dDCO.</p> <p>The biodiversity and ecological assessment should also consider flora, fungi and lichen assemblages where these contribute to the ecological value of habitats within the Order Limits and surrounding area. Botanical communities are integral to habitat classification and condition assessment, while notable fungal and lichen assemblages associated with ancient woodland, veteran trees, hedgerows or designated sites should be included where there is potential for effects arising from construction, operation or decommissioning activities.</p>
3.2.8	n/a	North Pennine SPA	<p>The applicant's attention is directed towards comments from Durham County Council (see appendix 2 of this Opinion) which advises that the North Pennine SPA should be scoped into assessment within the ES.</p>
3.2.9	n/a	Sensitive environmental information	<p>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.</p> <p>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</p>

ID	Ref	Description	Inspectorate's comments
			<p>disturbance, damage, persecution, or commercial exploitation arising from publication.</p> <p>The applicant's approach should be proportionate and only use these separate annexes for species where there is a genuine risk of harm.</p> <p>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.</p>
3.2.10	n/a	Environmental data-sharing	<p>The ES should clearly describe how environmental data collected during all phases of the proposed development will be shared with the relevant Local Environmental Records Centre(s) and any applicable environmental recording schemes, in line with best practice, and how these arrangements will be secured through the dDCO.</p>

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	Pages 85-86, Section 8.4	Climate Change Resilience (CCR) assessment: vulnerability to climate change impacts – construction	The Scoping Report proposes to scope out changes in climate during the approximate four-year construction period on the basis that significant changes to the climate over this timeframe are unlikely, and that embedded mitigation would minimise potential risks from climate-related hazards such as extreme temperatures, flooding and drought. These embedded measures, such as weather-sealing of outdoor equipment, would be secured through the Construction Environmental Management Plan (CEMP). The Inspectorate notes that the potential effects of flooding will be assessed within the Flood Risk Assessment (FRA) to be submitted with the application. The Inspectorate is content with this approach and agrees that this matter can be scoped out of further assessment.
3.3.2	Pages 85-86, Section 8.4	Climate Change Resilience (CCR) assessment: vulnerability to climate change – decommissioning	The Scoping Report proposes to scope out changes in climate during decommissioning on the basis that the pipeline would remain in-situ and similar embedded measures that are proposed to be implemented at construction would be set out in a DEMP. However, as noted in ID 2.0.8 above, there is limited and contradictory information provided in relation to decommissioning, and as such the Inspectorate does not agree that this can be scoped out of assessment at this stage.
3.3.3	Page 86, Section 8.4	In-combination climate change impact (ICCI) assessment –	The Scoping Report proposes to scope out in-combination climate change effects at construction and decommissioning using the same rationale for scoping out the CCR assessment at these phases. The Inspectorate agrees that in-combination effects during the construction and decommissioning phases are unlikely to result in significant effects. On the basis that an ICCI

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
		construction and decommissioning	assessment would be undertaken for the operational phase of the proposed development, which would consider where climate-related pressures may interact with impacts arising from the proposed development, the Inspectorate agrees that an ICCI assessment for construction and decommissioning can be scoped out. The climate change and resilience aspect chapter should signpost to where such effects are considered and presented in other relevant aspect chapters.

ID	Ref	Description	Inspectorate's comments
3.3.4	Pages 84-85, Section 8.4	Embedded mitigation – ICCI	The Scoping Report sets out embedded measures to increase the resilience of the proposed development to climate change; however, it does not make clear where embedded measures would minimise climate effects exacerbated from the proposed development. Such measures, such as drainage design and controls, should be explicitly linked to in-combination impacts as well as CCR risks. Mitigation measures should be clearly set out in the ES and cross referenced between relevant ES aspect chapters, such as water resources and flood risk, as appropriate.
3.3.5	n/a	Climate change with respect to flood risk	While the applicant proposes to assess any increased vulnerability to flood risk in the FRA outside of the ES, the applicant's attention is drawn to the comments from the Environment Agency (see appendix 2 of this Opinion) regarding the need to fully account for climate change allowances in the flood risk assessment. Appropriate cross-referencing between the climate change and flood risk chapters of the ES should be provided where relevant.

ID	Ref	Description	Inspectorate's comments
3.3.6	n/a	Precipitation change	The ES should consider the implications of the exposure of the buried sections of pipeline during operation and decommissioning phases from increased rainfall intensity as a result of climate change. The methods of reburial should also be considered in the ES and secured through the dDCO.

3.4 Cultural heritage

(Scoping Report Section 8.5)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.4.1	Page 93-94, Section 8.5	Temporary impacts to setting of designated and non-designated heritage assets: pipeline - operational	The rationale provided for scoping this matter out is that as the pipeline is below ground, there is no pathway for impacts on the setting of designated heritage assets during the operational phase. The Inspectorate agrees that this matter may be scoped out on the basis that temporary impacts on setting in relation to the pipeline would only occur during construction and decommissioning phases and therefore no additional potential direct impacts to heritage assets would occur during operation.
3.4.2	Page 93-94, Section 8.5	Temporary impacts to setting of designated and non-designated heritage assets: pipeline - decommissioning	The Scoping Report details that small sections of above ground pipeline may need to be removed upon decommissioning. As noted in ID 2.0.8, there is uncertainty around the extent and locations of above ground pipeline. The Inspectorate therefore considers that it is not appropriate to scope out this matter at this stage. The ES will need to demonstrate that any above ground asset removal is limited and controllable via the DEMP and would lead to no LSE on the heritage assets described in the Scoping Report.
3.4.3	Pages 93-94, Section 8.5	Temporary impacts to the setting of designated and non-designated heritage assets: AGI - operational	The Scoping Report seeks to scope out temporary impacts on both designated and non-designated heritage assets setting from AGI during operation. The Inspectorate agrees that this matter may be scoped out on the basis that temporary impacts on setting in relation to AGIs would only occur during construction and decommissioning phases and therefore no additional potential direct impacts to historic landscape would occur during operation.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.4.4	Page 95, Section 8.5	Permanent impacts to the setting of designated and non-designated assets: pipeline - all phases	<p>The rationale provided for scoping out permanent impacts on the settings of heritage assets is that the majority of the pipeline will be below ground. Due to the uncertainty noted in ID 2.0.8, the Inspectorate does not agree to scope this matter out. The ES should provide information detailing the extent and locations of the above ground sections of pipeline and an assessment of whether these would lead to an LSE on the heritage assets described in the Scoping Report.</p> <p>The applicant's attention is drawn to comments from Historic England (see appendix 2 of this Opinion) in regard to avoiding an impact on the significance of the scheduled monument of Preston-le-Skerne Deserted Village (NHLE 1002335), the Grade II* listed buildings of The Ivy House (NHLE 1139244), and Stockton and Darlington Railway Station and Worker's Housing (NHLE 1322808).</p>
3.4.5	Page 95, Section 8.5	Permanent impacts to setting of designated and non-designated assets: AGI – construction	<p>The rationale provided to scope this matter out on the basis that any impacts will be temporary in nature. The Scoping Report acknowledges under the construction phase assessment of potential impacts, on page 92 that "construction of the Proposed Development may lead to direct, permanent impacts on below ground heritage assets and through changes to the setting of designated and non-designated heritage assets." Page 93 states that appropriate buffers will be maintained, but no detail is provided on how these will be determined. The Inspectorate therefore considers that permanent impacts on the settings of both designated and non-designated assets during the construction phase should be scoped in and reported within the ES.</p>

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.4.6	Page 95, Section 8.5	Permanent impacts to setting of designated and non-designated assets: AGI – decommissioning	The rationale for scoping out permanent impacts, is that any impacts would be temporary in nature. The ES will need to demonstrate that any above ground asset removal is limited and controllable via the DEMP and would lead to no LSE on the heritage assets described in the Scoping Report.
3.4.7	Pages 95 – 96, Section 8.5	Physical impacts to below ground archaeological remains: pipeline and AGI - operation	<p>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. 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.</p> <p>The Inspectorate directs the applicant's attention to ID 2.0.7 of this Opinion in relation to the assessment of effects from maintenance activities.</p>
3.4.8	Pages 95 – 96, Section 8.5	Physical impacts to below ground archaeological remains: pipeline and AGI - decommissioning	In relation to potential impacts during decommissioning, as noted in ID 2.0.8, there is limited and contradictory information provided in relation to decommissioning, and as such the Inspectorate does not agree that this can be scoped out of assessment and reporting within the ES. The applicant's attention is directed to comments from Durham County Council (see appendix 2 of this Opinion) which raises concerns as to whether decommissioning will have no impacts on below ground archaeology and as such recommends that further assessment is required.
3.4.9	Page 96,	Temporary impacts on historic	The Inspectorate considers that insufficient information regarding the extent, duration, and frequency of proposed operation and maintenance activities has

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
	Section 8.5	landscape character: pipeline - operation	<p>been provided in order to confirm the absence of a significant effect. As such the Inspectorate does not agree to scope this matter out of the ES.</p> <p>The Inspectorate directs the applicant's attention to ID 2.0.7 of this Opinion in relation to the assessment of effects from maintenance activities.</p>
3.4.10	Page 96, Section 8.5	Temporary impacts on historic landscape character: pipeline - decommissioning	<p>In relation to potential temporary impacts on historic landscape during decommissioning, as noted in ID 2.0.8, there is limited and contradictory information provided in relation to decommissioning. The Inspectorate therefore does not agree that this can be scoped out of assessment and reporting within the ES.</p>
3.4.11	Page 96-97, Section 8.5	Temporary impacts on historic landscape character: AGI - operation	<p>The Inspectorate considers that insufficient information regarding the extent, duration, and frequency of proposed operation and maintenance activities has been provided in order to confirm the absence of a significant effect. As such the Inspectorate does not agree to scope this matter out of the ES. The Inspectorate directs the applicant's attention to ID 2.0.7 of this Opinion in relation to the assessment of effects from maintenance activities.</p>
3.4.12	Page 97, Section 8.5	Permanent impacts on historic landscape character: pipeline - operation and decommissioning	<p>The applicant proposes to scope out impacts on historic landscape character, based on full reinstatement of these features, 'as far as reasonably practicable', following completion of construction (refer to Section 4.9: Construction environmental management). The Inspectorate considers that there is not enough evidence to demonstrate that the pipeline would not lead to permanent impacts on historic landscape character during operation and decommissioning. As noted in ID 2.0.8, there is limited and contradictory information provided in relation to decommissioning, and as such the Inspectorate does not agree that this matter can be scoped out of assessment and reporting within the ES.</p>

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.4.13	Page 97, Section 8.5	Permanent impacts on historic landscape character: AGI - construction and decommissioning	The Inspectorate considers that there is insufficient evidence provided to identify whether there will be any likely LSE arising from construction effects of the AGI on historic landscape character and as such are not in a position to scope this matter out of the assessment. For the decommissioning phase, the ES will need to demonstrate that any above ground asset removal is limited and controllable via the DEMP and would lead to no LSE on the historic landscape character described in the Scoping Report.

ID	Ref	Description	Inspectorate's comments
3.4.14	Pages 91 - 92 Section 8.5	Study area	<p>It is noted that the study area for non-designated assets is proposed to be 500m, however the LVIA has proposed a 1km study area for visual effects. The rationale provided in part, is that the pipeline will be an entirely below ground facility. However, this statement is contradicted elsewhere in the Scoping Report and does not account for the effects arising from the AGI.</p> <p>The Inspectorate considers that the study area should remain sufficient to identify non-designated assets whose significance could be affected through direct disturbance or changes to setting, particularly in the vicinity of AGI and any permanent above ground pipeline or infrastructure.</p>
3.4.15	n/a	Assessment of setting effects	The assessment of impacts on the significance of heritage assets and setting should be supported by appropriate visualisations such as photomontages to help illustrate the likely impacts of the proposed development. Effort should be made to agree appropriate viewpoint locations for such visualisations with relevant stakeholders including local authorities and Historic England. Cross

ID	Ref	Description	Inspectorate's comments
			reference should be made to the landscape and visual ES aspect chapter to avoid duplication.

3.5 Greenhouse gases

(Scoping Report Section 8.6)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.5.1	Page 105, Section 8.6	GHG emissions from decommissioning the pipeline	The Scoping Report provides limited justification for scoping out greenhouse gas (GHG) emissions for the pipeline at the decommissioning phase, beyond stating that the pipeline would be left in-situ following cessation of operation. However, Section 4.11 notes that sections of the pipeline will need to be removed, as noted in ID 2.0.8. Furthermore, sources of GHG emissions from decommissioning AGI, such as GHG emissions from the disposal of material, are likely to also be applicable to decommissioning the pipeline. In light of this, and in the absence of further detail on pipeline decommissioning, the Inspectorate cannot agree to scope this matter out at this stage. The Inspectorate would therefore expect potential GHG emissions during decommissioning to be considered within the ES for both AGI and the pipeline, and an assessment of impacts provided where there is the potential for likely significant effects.

ID	Ref	Description	Inspectorate's comments
3.5.2	Page 103, Section 8.6	Future baseline	The Scoping Reports states that indirect GHG emissions are expected to decline for the future baseline based on factors such as decarbonisation of industry and local carbon reduction targets. However, it does not specify the extent of this projected decline or how it would be incorporated into the assessment methodology. If any projected decline is included within the assessment methodology, it should be clearly explained and justified in the ES.

ID	Ref	Description	Inspectorate's comments
3.5.3	n/a	Hydrogen leakage and venting	The ES should clearly address the monitoring of hydrogen leakage from the pipeline and venting from the AGI. It should set out and justify the measures to monitor and minimise leakage/ venting and explain how these measures would be secured through the dDCO.

3.6 Ground conditions

(Scoping Report Section 8.7)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.6.1	Page 116, Section 8.7	Regionally Important Geological Sites (RIGS/) and Local Geological Sites (LGS): pipeline and AGI – all stages	The Scoping Report states that no RIGS or LGS sites are present within the Scoping Boundary. It is proposed that impacts at all stages are therefore scoped out as there are no interactions with RIGS/LGS. However, under assumptions and limitations, on page 121 of the Scoping Report, it is stated that some datasets, including RIGS/ LGS which may be located in Stockton-on-Tees, were unavailable when searching online. As the locations of RIGS/LGS in Stockton-on-Tees remain uncertain, the Inspectorate is unable to scope this matter out at this stage. The ES should assess this matter or present appropriate justification to demonstrate the absence of LSE.
3.6.2	Page 116-117, Section 8.7	Groundwater and water contamination: pipeline and AGI – operation	It is proposed that contamination impacts associated with existing contaminant linkages are scoped out for the operational phase. It is stated that impacts would be controlled through appropriate design and construction including the design specification for pipelines to meet standards such as the Health and Safety Executive (HSE) Pipeline Safety Regulations (PSR), 1996, IGEM/TD/13 Edition 3: Pressure regulating and exceeding 7 bar pipeline installations (Ref 4.1) and IGEM/TD/1 Edition 6 with amendments May 2024 - Steel pipelines for high pressure gas transmission (Ref 4.2) (including published hydrogen supplements where applicable). The Inspectorate agrees that on the basis that the above measures and commitments are secured through the dDCO, that the potential for significant effects would be unlikely and that this matter can be scoped out.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.6.3	Page 116-117, Section 8.7	Groundwater and water contamination: pipeline and AGI – decommissioning	<p>The rationale provided for scoping out this matter is that with the exception of very minor sections in existing industrial areas, the pipeline will be left in situ for decommissioning and there is no contamination pathway with potential contamination during the decommissioning of AGIs to be controlled via a DEMP. The Inspectorate considers that there is insufficient evidence provided to identify whether there will be any likely LSE arising from decommissioning activities and as such are not in a position to scope this matter out of the assessment. The ES will need to demonstrate that any above ground asset removal is limited and controllable via the DEMP and would lead to no LSE on the groundwater contamination.</p>
3.6.4	Page 117, Section 8.7	Operation and maintenance activities	<p>The Scoping Report details that an outline Operational Environmental Management Plan (oOEMP) will be prepared to accompany the DCO and a final OEMP produced in accordance with the oOEMP following grant of a DCO, to control operational environmental effects. Given the control measures via the OEMP, operational activities are proposed to be scoped out of the assessment of ground conditions.</p> <p>The Inspectorate agrees that on the basis that the above measures and commitments are secured in the application, no significant effects are likely to occur, and that operational activities can be scoped out of further investigation. However, the Inspectorate directs the applicant's attention to ID 2.0.7 of this Opinion in relation to the assessment of effects from maintenance activities.</p>
3.6.5	Page 118-119,	Geodiversity: pipeline – all phases	<p>It is proposed that construction impacts on geodiversity is scoped out for pipelines due to there being no interactions with RIGS/ LGS sites. It is also stated that operation and decommissioning impacts on geodiversity is to be</p>

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
	Section 8.7		<p>scoped out with the exception of very minor sections in existing industrial areas as the majority of the pipeline would be left in-situ.</p> <p>As there is uncertainty in regard to the locations of RIGS/LGS in Stockton -on- Tees, and the locations of above ground pipelines, the Inspectorate is unable to scope these matters out. The ES should assess potential LSE at all phases or present appropriate justification to demonstrate the absence of LSE.</p>
3.6.6	Page 119, Section 8.7	Geodiversity: AGI – all phases	<p>It is proposed that impacts from AGI can be scoped out as none are located in Regionally Important Geological Sites.</p> <p>See ID 3.5.4 above, as the Scoping Report refers to uncertainty in regard to the locations of RIGS in Stockton-on-Tees, the Inspectorate is unable to scope this matter out at this stage. The ES should assess this matter or present appropriate justification to demonstrate the absence of LSE.</p>
3.6.7	Page 119, Section 8.7	Groundwater and water contamination: pipeline - operation	<p>It is proposed that contamination impacts to groundwater and water contamination from the pipeline when operational can be scoped out due to the nature of hydrogen and the design specification for pipelines to meet standards such as the HSE PSR, 1996.</p> <p>The Inspectorate agrees that on the basis that the controls are secured through the dDCO, no significant effects are likely to occur, and that this matter can be scoped out of further investigation.</p>
3.6.8	Page 119, Section 8.7	Groundwater and water contamination:	<p>The Scoping Report states that the majority of the pipeline will be left in-situ at decommissioning stage with the exception of very minor sections, and that therefore this matter can be scoped out. As noted in ID 2.0.8, due to</p>

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
		pipeline - decommissioning	uncertainty regarding the decommissioning stage, the Inspectorate is unable to scope this matter out at this stage.
3.6.9	Page 119, Section 8.7	Groundwater and water contamination: AGI - decommissioning	Contamination impacts during the decommissioning of AGIs is proposed to be scoped out as this is to be controlled via a DEMP. However, as noted in ID 2.0.8 above, there is limited and contradictory information provided in relation to decommissioning, and as such the Inspectorate is not in agreement that this can be scoped out of assessment at this stage.

ID	Ref	Description	Inspectorate's comments
3.6.10	Page 121	Assumptions and limitations - study area	The Scoping Report determines that no RIGS/LGS are present within the Scoping Boundary, but also states that some datasets, including RIGS/ LGS which may be located in Stockton-on-Tees, were unavailable when searching online. The ES should adopt a reasonable worst-case approach where any uncertainty remains to ensure an accurate assessment.

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	Page 131, Section 8.8	Temporary effects to landscape character: pipeline - operation and decommissioning	<p>The Scoping Report states that as the majority of the pipeline would remain buried during operation and decommissioning, significant effects are unlikely to occur. 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.</p> <p>The Inspectorate directs the applicant's attention to ID 2.0.7 of this Opinion in relation to the assessment of effects from maintenance activities.</p>
3.7.2	Page 131, Section 8.8	Temporary effects to landscape character: AGI - operation	<p>Paragraph 4.2.2 of the Scoping Report states that engineering work is currently being undertaken to identify the optimum size and most appropriate locations for AGIs including the potential for modifying existing natural gas AGI. 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.</p> <p>The Inspectorate directs the applicant's attention to ID 2.0.7 of this Opinion in relation to the assessment of effects from maintenance activities.</p>
3.7.3	Page 131, Section 8.8	Long term effects on landscape character: pipeline and AGI – construction and decommissioning	<p>The Scoping Report acknowledges that operational effects of the Proposed Development could lead to significant landscape and visual effects. The rationale for scoping out the construction and decommissioning phases is due to the short-term nature of these phases and therefore long-term effects can</p>

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			be scoped out. On this basis, the Inspectorate agrees that long term effects are not likely to occur. This matter can be scoped out of the ES.
3.7.4	Page 131, Section 8.8	Temporary effects on the LCA within the LVIA study area: pipeline – operation and decommissioning	<p>The Scoping Report states that the majority of the pipeline would remain buried during operation and at decommissioning, as such it is anticipated that significant effects are unlikely to occur. 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.</p> <p>The Inspectorate directs the applicant's attention to ID 2.0.7 of this Opinion in relation to the assessment of effects from maintenance activities.</p>
3.7.5	Page 131, Section 8.8	Temporary effects on the LCA within the LVIA study area: AGI - operation	<p>The rationale provided in the Scoping Report for scoping out these matters is that any effects are reversible following completion of the construction phase. 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.</p> <p>The Inspectorate directs the applicant's attention to ID 2.0.7 of this Opinion in relation to the assessment of effects from maintenance activities.</p>
3.7.6	Page 132, Section 8.8	Long term effects on the LCA within the LVIA study area: pipeline – construction and decommissioning	<p>The report states that as the majority of the pipeline is to be buried, with the affected land reinstated to its pre-construction condition as far as reasonably practicable, it is anticipated that significant effects are unlikely to occur. However, any potential changes will be assessed within the ES. As uncertainty remains the Inspectorate considers that it is not appropriate to scope out</p>

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			potential effects at this stage. The ES should assess this matter or present appropriate justification to demonstrate the absence of LSE.
3.7.7	Page 132, Section 8.8	Long term effects on the LCA within the LVIA study area: AGI – construction and decommissioning	Long term effects on LCA are identified, based on the anticipated parameters for the AGI and indicative site layout, presented in Volume II. The Scoping Report does not present any rationale for scoping out effects during the construction and decommissioning phases. However, the Inspectorate considers that long terms 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.
3.7.8	Page 132, Section 8.8	Effects on the seascape character: pipeline and AGI – all phases	<p>It is proposed that this is scoped out of the assessment given the temporary nature of the pipeline construction works, and the context of the extensively developed coast within this large seascape area, the underground nature of the pipeline, and distance of the AGI to the seascape character area. The Scoping Report acknowledges on page 129 that there may be temporary impacts due to construction activities.</p> <p>As there is uncertainty regarding above ground pipeline locations and decommissioning activity as detailed in ID 2.0.8, the Inspectorate considers that it is not appropriate to scope out potential effects at this stage. The ES should assess this matter or present appropriate justification to demonstrate the absence of LSE.</p>
3.7.9	Page 132, Section 8.8	Long term effects to people's views and visual amenity: pipeline and AGI –	The Scoping Report states that as the pipeline is to be buried, with the affected land reinstated to its pre-construction condition 'as far as reasonably practicable', that it is anticipated that significant effects are unlikely to occur during operation, but that any potential changes will be assessed within the ES. As uncertainty remains the Inspectorate considers that it is not

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
		construction and decommissioning	appropriate to scope out potential effects at this stage. The ES should assess this matter or present appropriate justification to demonstrate the absence of LSE.
3.7.10	Page 133, Section 8.8	Temporary effects associated with lighting: operation and decommissioning.	<p>It is proposed that temporary effects during operational use and decommissioning can be scoped out. The Inspectorate agrees to scope out temporary lighting effects in the operation phase. The Inspectorate directs the applicant's attention to ID 2.0.7 of this Opinion in relation to the assessment of effects from maintenance activities.</p> <p>However, as there is uncertainty regarding above ground pipeline locations and decommissioning activity as detailed in ID 2.0.8 and therefore the associated lighting requirements, the Inspectorate considers that it is not appropriate to scope out potential lighting effects in relation to decommissioning 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.</p>
3.7.11	Page 133, Section 8.8	Long term effects associated with lighting: pipeline – all phases	The Scoping Report details that effects associated with the pipeline at operation and decommissioning stages are proposed to be scoped out as the majority of the pipeline will be buried and unlit. 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.
3.7.12	Page 133,	Long term effects associated with	The Inspectorate considers that insufficient information has been provided on the proposed lighting scheme and the location of AGI to rule out significant effects. The ES should assess the potential for long term lighting impacts

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
	Section 8.8	lighting: AGI – all phases	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. The Inspectorate directs the applicant's attention to ID 2.0.7 of this Opinion in relation to the assessment of effects from maintenance activities.

ID	Ref	Description	Inspectorate's comments
3.7.13	Page 129, Section 8.8	Study area	<p>The Scoping Report details that the study area may be refined up and down but proportionate and focused on areas where significant effects are likely to occur, that based on similar projects significant effects are unlikely to occur beyond approximately 2km.</p> <p>Once the study area has been finalised, the LVIA should provide a clear justification for the agreed extent and viewing distances, demonstrating that the approach is proportionate and appropriately focused on areas where significant landscape and visual effects are likely to occur. In particular consideration should be given towards the potential for visual intrusion into, and out of the North York Moors National Park and to the potential for impacts on the National Parks dark skies qualities.</p>
3.7.14	n/a	Representative viewpoints	The Inspectorate notes that representative viewpoints will be identified following the scoping process in consultation with the Local Planning Authorities and relevant stakeholders. 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

ID	Ref	Description	Inspectorate's comments
			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	Pages 142-145, Section 8.9	<p>The following natural hazards – all phases:</p> <ul style="list-style-type: none"> • Earthquakes • Volcanic eruption • Tsunamis • Flooding • Avalanches • Cyclones, hurricanes, typhoons, storms and gales • Thunderstorms • Extreme Temperatures • Droughts • Wildfires • Fog 	<p>The Scoping Report proposes to scope out natural hazards including earthquakes, volcanic eruptions, tsunamis, avalanches, cyclones, hurricanes, typhoons, droughts, wildfires and fog on the basis that either risks are unlikely given the geographical location of the proposed development, or that any such risks would be managed through design and in-built control systems.</p> <p>Construction activities are proposed to be managed under the CEMP, and the pipeline and AGI would be designed in accordance with the relevant health and safety legislation, such as the Construction Design and Management (CDM) Regulations 2015 and the Gas Safety (Management) Regulations 1996. On this basis, the Inspectorate agrees that these matters can be scoped out of further assessment.</p> <p>For risks related to extreme temperatures, and storms and gales, including adverse wind conditions, the Scoping Report states that impacts would be managed through engineering design and management controls, and any residual risks would be reported under Chapter 9: Climate Change and Resilience of the ES. The Inspectorate is content with this approach to avoid duplication.</p> <p>The Scoping Report also states that the risk of major accidents and disasters associated with flooding will be assessed in the FRA which would accompany the application. On this basis, the Inspectorate agrees that further assessment of flooding within the Major Accidents and Disasters aspect chapter is not</p>

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			required. The ES should, however, provide clear cross-referencing within this aspect chapter to where the relevant assessments are located.
3.8.2	Pages 142-143, Section 8.9	Landslides – decommissioning	The Scoping Report proposes to scope out landslide risks at decommissioning on the basis that decommissioning works would not result in increased landslide risk to or from the proposed development. Noting ID 2.0.8, the Inspectorate does not have sufficient evidence about decommissioning activities to exclude the possibility of significant effects from landslide risks. The Inspectorate is therefore unable to agree to scope this matter out for the decommissioning phase.
3.8.3	Page 143, Section 8.9	Sinkholes – operation and decommissioning	The Scoping Report does not expand on its statement that works associated with the operational and decommissioning phases would not contribute to an increased sinkhole risk. While the Inspectorate accepts that significant effects are more likely during construction, the ES should include sufficient information to demonstrate that impacts can be discounted during operational and decommissioning or should make an assessment of LSE.
3.8.4	Pages 145-146, Section 8.9	Biological hazards – all phases: <ul style="list-style-type: none"> • Disease epidemics and animal diseases • Plants 	The Inspectorate agrees that the construction, operational, and decommissioning phases of the proposed development are unlikely to give rise to any disease epidemics, and any potential biosecurity risks can be managed through standard management measures for the handling and disposal of any diseased or invasive plant material. Therefore, these matters can be scoped out of the assessment.
3.8.5	Pages 146-	Societal hazards – all phases:	The Inspectorate agrees that risks to or from the proposed development in relation to these matters are not likely to result in significant effects from

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
	147, Section 8.9	<ul style="list-style-type: none"> • Political considerations e.g. demonstrations • Terrorism/ crime • Displaced populations 	major accident and disasters. Societal hazards can be scoped out of the assessment.
3.8.6	Pages 147-148, Section 8.9	Chemical sites and major accidents - pipeline decommissioning	The Scoping Report does not provide sufficient justification for scoping out this matter during decommissioning. Noting ID 2.0.8 above and given the uncertainty regarding whether pipeline removal may be required, any major accidents at nearby chemical sites could have implications for personnel undertaking decommissioning activities. The ES should therefore include an assessment where there is potential for likely significant effects.
3.8.7	Page 148, Section 8.9	Nuclear sites – AGI - all phases	The Inspectorate agrees that this matter can be scoped out as the proposed modified AGI would not be located within the Detailed Emergency Planning Zone (DEPZ) for nuclear sites. The Inspectorate notes this matter is scoped in for the pipeline for all phases of the proposed development.
3.8.8	Pages 148-149, Section 8.9,	Dam failure – all phases	The applicant proposes to scope out potential failure of a UK dam, reservoir or flood defence on the basis that any such risk would be assessed in the FRA which would accompany the application, as indicated in Section 8.16 (page 244) of the Scoping Report. On this basis, the Inspectorate is content to scope this matter out to avoid duplication of effort. The ES should nevertheless ensure sufficient cross referencing between aspect chapters is present.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.8.9	Page 149, Section 8.9	Mines and storage caverns – operation and decommissioning	<p>The Scoping Report proposes to scope out risks associated with mines and storage caverns on the basis that any identified risks would be reduced to As Low As Reasonably Practicable (ALARP) through embedded design measures during construction, and that no residual risks are anticipated during the operational and decommissioning phases.</p> <p>Considering the location of nearby Coal Mining Reporting Areas and brine storage caverns, as set out in page 114 of the Scoping Report, and in the absence of detail regarding the exact measures proposed to reduce risks to non-significant, the Inspectorate is not in a position to scope out these matters for the operation and decommissioning phases. The ES should therefore provide an assessment where there is potential for likely significant effects.</p>
3.8.10	Pages 149-150, Section 8.9	Risk of fire – construction and decommissioning	<p>The Scoping Report proposes to scope out this matter for construction and decommissioning on the basis that any risk of fire from the pipeline and at AGIs would be appropriately managed through the proposed CEMP and DEMP. The Inspectorate is content that the risk of fire during construction and decommissioning would be appropriately managed through the proposed CEMP and DEMP and is therefore not likely to result in significant effects in terms of Major Accidents and Disasters (MA&D) and can be scoped out of further assessment.</p>
3.8.11	Pages 150-152, Section 8.9	Transport accidents – all phases: <ul style="list-style-type: none"> • Road • Rail 	<p>The Scoping Report proposes to scope out an assessment of transport accidents on the basis that given the nature and location of the proposed development, risks of maritime and aircraft disasters are not likely, and that any risks in relation to road and rail accidents could be mitigated through embedded measures. The Scoping Report states that road traffic accidents would be assessed within the transport assessment in the ES, and appropriate</p>

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
		<ul style="list-style-type: none"> • Maritime disaster • Aviation 	<p>mitigation would be included within the proposed CTMP. The Inspectorate notes that the applicant proposes to scope in an assessment of rail accidents at construction for the pipeline only.</p> <p>Provided the ES includes clear cross-referencing between aspect chapters and signposts the relevant avoidance and mitigation measures relating to transport accidents, the Inspectorate agrees that these matters can be scoped out of further assessment within the ES.</p>
3.8.12	Pages 152-155, Section 8.9	<p>Pollution accidents – all phases:</p> <ul style="list-style-type: none"> • Air quality/ human health • Land • Water • Electricity • Water supply • Sewage system • Chemical/ biological/ radiological/ nuclear transport systems crowded places 	<p>The Scoping Report proposes to scope these matters out on the basis that, whilst there may be an increased risk of spillages and leaks during construction and decommissioning, standard pollution control measures would be implemented through the proposed CEMP, OEMP and DEMP. The Inspectorate agrees that the risk of pollution accidents are not likely to result in significant effects in terms of MA&D. Accordingly, these matters can be scoped out of further assessment, with the exception of potential human health effects arising from the release of hydrogen to the surrounding environment in the event of a large-scale containment failure, which the applicant proposes to scope in for the operational phase.</p> <p>The ES should clearly signpost where these matters are assessed within other relevant aspect chapters, such as the ground conditions and water environment chapters, and should identify where any relevant avoidance and mitigation measures would be secured through the dDCO, where required.</p>

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.8.13	Page 154, Section 8.9	Gas – operation and decommissioning	<p>The Scoping Report notes the presence of underground transmission pipelines in the scoping boundary and proposes to scope out MA&D effects from gas on the basis that no such interaction with the transmission pipelines is anticipated following construction. While the Inspectorate agrees that significant effects are not likely for the operational period, with reference to ID 2.0.8, the Inspectorate cannot agree to scope out effects during decommissioning given uncertainty over pipeline removal during this phase. The ES should therefore assess any potential MA&D effect that could arise from gas at decommissioning for the pipeline as well as for AGIs.</p>
3.8.14	Pages 154 to 155, Section 8.9	Unexploded ordnance (UXO) – operation and decommissioning	<p>The Scoping Report states that sections of the pipeline route corridor are located within areas of high UXO risk associated with World War II bombing, and that UXO risk will be assessed in the Preliminary Risk Assessment (PRA), which will accompany the ES. This matter is scoped out for the operational phase, on the basis that maintenance activities would not result in UXO risk, and for the decommissioning phase on the basis that the pipeline would remain in-situ following decommissioning.</p> <p>However, with reference to ID 2.07, the Inspectorate considers that further ground disturbance within areas of UXO risk may be required during the operational phase if a substantive defect in the pipeline is identified and emergency repairs are needed. Furthermore, with reference to ID 2.0.8, in the absence of detail regarding decommissioning activities, the Inspectorate cannot rule out the potential for further disturbance within areas of UXO risk during decommissioning.</p> <p>Therefore, the ES should include a high-level assessment of risks of major accidents and disasters arising from UXO risk during operation and</p>

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			<p>decommissioning, as well as during construction, and include an assessment of any LSE where appropriate.</p> <p>The applicant's attention is drawn to comments from the Marine Management Organisation (MMO) (see appendix 2 of this Opinion), regarding the need for separate licenses to survey and clear any identified UXOs under section 66 of the Marine and Coastal Access Act 2009.</p>
3.8.15	Pages 155 - 157, Section 8.9	<p>Technological failures – all phases:</p> <ul style="list-style-type: none"> • Cyber-attacks • Bridge failure • Mast and tower collapse • Tunnel collapse or failure 	<p>Based on the reasoning and evidence presented in the Scoping Report, the Inspectorate is content that risks to or from the proposed development from cyber-attacks, bridge failure, mast and tower collapse, and tunnel collapse or failure, are not likely to result in significant effects. These matters can be scoped out of the assessment.</p>

3.9 Marine biodiversity

(Scoping Report Section 8.10)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.9.1	Pages 174-177, Section 8.10	<p>Teemouth and Cleveland Coast Ramsar site and SPA: Pipeline - operation and decommissioning</p> <ul style="list-style-type: none"> • Intertidal mudflats • Coastal saltmarsh • Floodplain grazing marsh (Ramsar) 	<p>The Inspectorate considers that insufficient information regarding the extent, duration and frequency of proposed activities has been provided in order to confirm the absence of a significant effect in the operational phase. As detailed in ID 2.1.1 the methods of pipeline crossing of the River Tees and the Greatham Creek/ Seaton on Tees is yet to be determined. In-water works during operation are likely to be required for scheduled maintenance and refurbishment works using small vessels. As such the Inspectorate does not agree to scope this matter out of the ES. The Inspectorate directs the applicant's attention to ID 2.0.7 of this Opinion in relation to the assessment of effects from maintenance activities.</p> <p>With regards to the decommissioning phase, as detailed in ID 2.0.8 there is uncertainty within the Scoping Report on decommissioning activities. As such, the Inspectorate is not content to scope out impacts, and a full assessment of potential effects should be provided within the ES. The applicant's attention is drawn towards comments from Natural England (see appendix 2 of this Opinion) which recommends that the assessment of effects on these designations should include: changes in water quality, to include consideration of pollution pathways during operation, for example sediment mobilization, habitat loss, loss of functionally linked land, impacts on air quality and noise and visual disturbance.</p>

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.9.2	Page 174, Section 8.10	<p>Teesmouth and Cleveland Coast Ramsar and SPA: AGI - all phases</p> <ul style="list-style-type: none"> • Intertidal mudflats • Coastal saltmarsh • Floodplain grazing marsh (Ramsar) 	<p>The rationale for scoping out this LSE is that works associated with AGI's would not interfere with the marine environment due to intervening distance. The Inspectorate considers that this conclusion is broadly reasonable for the operation phase, given the limited scale of infrastructure and low intensity operational activity. The Inspectorate directs the applicant's attention to ID 2.0.7 of this Opinion in relation to the assessment of effects from maintenance activities.</p> <p>However, the Inspectorate considers that the construction and decommissioning of any AGI have the potential to give rise to marine impact pathways. The ES will need to confirm the final siting of AGIs, control of lighting and maintenance activities, and assess the interaction with functionally linked land. Further evidence will be required within the ES to demonstrate that no disturbance or other impact pathways arise that could affect the designated sites.</p>
3.9.3	Page 175, Section 8.10	<p>Teesmouth and Cleveland Coast SSSI: Pipeline - operation and decommissioning</p> <ul style="list-style-type: none"> • Intertidal mudflats • Saline lagoons 	<p>The Inspectorate consider that insufficient information regarding the extent, duration and frequency of proposed activities at the operation and decommissioning phase has been provided in order to confirm the absence of a significant effect. As such the Inspectorate does not agree to scope this matter out of the ES. The Inspectorate directs the applicant's attention to ID 2.0.7 of this Opinion in relation to the assessment of effects from maintenance activities.</p> <p>With regards to the decommissioning phase, as detailed in ID 2.0.8 there is uncertainty around the extent and locations of above ground pipeline and therefore decommissioning activities. The applicant's attention is drawn to</p>

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
		<ul style="list-style-type: none"> • Coastal saltmarsh • Floodplain grazing marsh • Seals 	<p>comments from Natural England (see appendix 2 of this Opinion) in this regard.</p>
3.9.4	Page 175, Section 8.10	<p>Teesmouth and Cleveland Coast SSSI: AGI - all phases</p> <ul style="list-style-type: none"> • Intertidal mudflats • Coastal saltmarsh • Saline lagoons • Floodplain grazing marsh • Seals 	<p>The rationale for scoping this matter out is that the works associated with AGI's would not interfere with the marine environment due to intervening distance. However, map 4.1 in annex II illustrates the potential locations for AGI and this shows several of the proposed AGI locations (M2, M3 and M4) within proximity to the Tees Estuary and the associated designated intertidal and coastal habitats. Figure 8.6b illustrates the marine biodiversity constraints, which shows that the proposed development and the proposed location for AGI M2 is within the coastal floodplain grazing marsh and intersects the mudflats. The Inspectorate considers that there is potential for effects on the SSSI from the AGI in all phases of development and therefore does not agree that this should be scoped out of assessment within the ES. Further evidence will be required within the ES to demonstrate that no disturbance or other impact pathways arise that could affect the designated sites.</p>
3.9.5	Page 175, Section 8.10	<p>Teesmouth NNR: pipeline - operation and decommissioning</p>	<p>The Inspectorate considers that insufficient information regarding the extent, duration and frequency of proposed activities during operation and decommissioning has been provided in order to confirm the absence of a significant effect. As such the Inspectorate does not agree to scope this matter out of the ES. The Inspectorate directs the applicant's attention to ID 2.0.7 of</p>

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
		<ul style="list-style-type: none"> • Intertidal mud flats • Floodplain grazing marsh • seals 	<p>this Opinion in relation to the assessment of effects from maintenance activities.</p> <p>The applicant's attention is drawn to comments from Natural England (see appendix 2 of this Opinion) with regard to potential to adversely affect harbour seal through noise and visual disturbance, including in the operational phase. Disturbance activities should be avoided from May through to September.</p>
3.9.6	Page 175, Section 8.10	<p>Teemouth NNR: AGI - all phases</p> <ul style="list-style-type: none"> • Intertidal mud flats • Floodplain grazing marsh • seals 	<p>The basis for scoping out the potential for AGI to have LSE on the NNR is that works associated with AGI would not interfere with the marine environment due to intervening distance. However, as the exact location of AGI are not confirmed within the Scoping Report, the Inspectorate considers that LSE cannot ruled out. The ES will need to demonstrate that the final siting and phases of the AGI leads to no LSE to the sensitive habitats or species within the NNR or provide a full assessment of LSE.</p>
3.9.7	Page 176, Section 8.10	Coastal sand dunes - all phases	<p>The rationale for scoping this matter out is that the coastal sand dunes are located approximately 455m downstream of the Greatham Creek Crossing. However, the Inspectorate considers that insufficient information has been provided to rule out whether there could be a credible impact pathway that could result in geomorphological or ecological change. Based on the information provided and illustrated in Volume II, Figure 8.6b, the Inspectorate is not content that the proposed development is unlikely to lead to direct impacts on coastal sand dunes. The ES should provide an assessment of whether direct and indirect effects from the proposed development on the sand dunes, which may include from hydrological changes, sediment movement</p>

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			and/ or dust deposition are likely to lead to LSE on the irreplaceable habitat at this location.
3.9.8	Page 178, Section 8.10	Migratory and non-migratory fish and marine cetaceans – all phases	<p>The Inspectorate considers that insufficient information has been provided to rule out credible impact pathways for fish and marine cetaceans from activities required as part of the proposed development. There is some uncertainty around the crossing of the Greatham Creek and the need for in-water works, in particular which mean that it is unclear whether impacts could arise. Confirmation on whether direct in-channel work will be required is required and the ES will need to assess whether any activities required as part of the proposed development will give rise to disturbance, pollution or other pathways which could affect the river Tees and Greatham Creek.</p> <p>The applicant's attention is directed towards comments from the Environment Agency (see appendix 2 of this Opinion) with regards to assessing the impact on fish in the River Tees.</p>
3.9.9	Page 178, Section 8.10	Intertidal and benthic communities: pipeline – operation	<p>The Inspectorate considers that insufficient information regarding the extent, duration and frequency of proposed activities has been provided, including the uncertainty of river crossings, as detailed in ID 2.1.1 in order to confirm the absence of a significant effect. As such the Inspectorate does not agree to scope this matter out of the ES. The Inspectorate directs the applicant's attention to ID 2.0.7 of this Opinion in relation to the assessment of effects from maintenance activities.</p>
3.9.10	Page 178,	Intertidal and benthic communities:	<p>Page 173 details that all above ground sections of pipework will be removed, unless otherwise agreed with landowners. If the Greatham Creek crossing is required, it is anticipated that it would be deconstructed from the shoreline. As</p>

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
	Section 8.10	pipeline – decommissioning	detailed in ID 2.0.8 there is uncertainty around the decommissioning activities, and it is not known at this stage whether these could impact on intertidal and benthic communities. The Inspectorate therefore considers that insufficient information is available and does not agree to scope this matter out. The applicant's attention is drawn to comments from Natural England (see appendix 2 of this Opinion) in this regard.
3.9.11	Page 178, Section 8.10	Intertidal and benthic communities: AGI – all phases	The rationale provided in the Scoping Report is that works associated with AGI's would not interfere with the marine environment due to intervening distance. However, as the exact location of AGI are not confirmed within the Scoping Report, the Inspectorate considers that LSE cannot ruled out. The ES will need to demonstrate that the final siting and phases of the AGI would lead to no LSE to intertidal and benthic communities or provide a full assessment of LSE.
3.9.12	Page 178, Section 8.10	Marine INNS: Pipeline and AGI - all phases	<p>The Scoping Report acknowledges on Page 170 that the potential exists for the introduction or spread of INNS through movement of plant, equipment and materials, within the study area. The rationale for scoping out the risk of INNS introduction is that this will be controlled through biosecurity measures contained within the CEMP.</p> <p>The Inspectorate does not agree to scope out INNS. The ES should explain any mitigation measures and biosecurity precautions required to prevent the introduction and spread of INNS. Measures relied upon in the ES should be secured through the dDCO. Any measures relied upon in the ES should be discussed with relevant consultation bodies, in an effort to agree the approach. The applicant's attention is drawn to comments from the Environment Agency</p>

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			(see appendix 2 of this Opinion) in this regard, which request an INNS or Biosecurity Management Plan.

ID	Ref	Description	Inspectorate's comments
3.9.13	Section 4.2	River Tees and Greatham Creek Crossings/ Seaton on Tees channel crossings	The Scoping Report outlines the possible crossings options, with the selected option not known at this stage. An existing tunnel or an existing third-party pipe will be used for the Greatham Creek/ Seaton on Tees Channel. The River Tees crossing will either use a trenchless solution located below the river bed or use existing assets with no operational activities within the marine environment. Page 172 of the Scoping Report mentions that works taking place in water during operation would be limited to scheduled inspections and where required, minor refurbishment using small vessels. The applicant will need to confirm the viability of using the existing tunnel infrastructure for the river crossing. Where existing infrastructure cannot be demonstrated the ES should provide an appropriate assessment based on a worst-case scenario for crossing the River Tees and Greatham Creek. The Inspectorate directs the applicant's attention to ID 2.0.7 of this Opinion in relation to the assessment of effects from maintenance activities.
3.9.14	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

ID	Ref	Description	Inspectorate's comments
			<p>vulnerable environmental features should be provided in separate annexes by the applicant. This approach reduces the sensitive ecological feature's risk of disturbance, damage, persecution, or commercial exploitation arising from publication.</p> <p>The applicant's approach should be proportionate and only use these separate annexes for species where there is a genuine risk of harm.</p> <p>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.</p>

3.10 Material assets and waste

(Scoping Report Section 8.11)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.10.1	Page 187, Section 8.11	Changes in demand for materials – operation and decommissioning	The Scoping Report proposes to scope this matter out on the basis that material demand impacts during the operational and decommissioning phases would be negligible. While the Inspectorate agrees that significant effects during operation are not likely, insufficient justification has been provided to scope out decommissioning effects. Section 8.11 of the Scoping Report states that only the AGI would be decommissioned and removed; however, as noted in ID 2.0.8, elsewhere in the Scoping Report it states that small sections of pipeline may also need to be removed. Therefore, the Inspectorate cannot agree to scope out changes in demand for materials at decommissioning without further clarification of decommissioning activities.
3.10.2	Pages 187-188, Section 8.11	Changes in available landfill capacity – operation and decommissioning	The Scoping Report proposes to scope this matter out on the basis that waste generation during operation and decommissioning would be limited and would not result in likely significant effects on landfill capacity. While the Inspectorate agrees that significant operational effects are unlikely, and notes that a DEMP would manage decommissioning waste, given uncertainty regarding decommissioning activities, as referred to in ID 2.0.8, the Inspectorate does not agree to scope out impacts on landfill capacity during decommissioning at this stage.
3.10.3	Page 188,	Changes to safeguarded mineral sites – operation	The Scoping Report states that the Scoping Boundary intercepts with Mineral Safeguarding Areas (MSA) for deep and shallow resources, including potash, salt and gypsum.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
	Section 8.11	and decommissioning	<p>Changes to safeguarded mineral sites during operation and decommissioning are proposed to be scoped out on the basis that the proposed development is not anticipated to interact with safeguarded allocated minerals or waste sites during these phases.</p> <p>The Inspectorate agrees that significant effects during operation are not likely, subject to the proposed development not interacting with safeguarded allocated minerals or waste sites and this being secured through the dDCO. However, given uncertainty over pipeline decommissioning, as referred to in ID 2.0.8 above, impacts during decommissioning on safeguarded mineral sites within the application site boundary should be assessed within the ES.</p>
3.10.4	Page 188, Section 8.11	Waste arising from extraction, processing and manufacture of construction components and products – all phases	<p>The Scoping Report proposes to scope this matter out on the basis that the associated construction materials and components are being developed in a manufacturing environment with their own waste management plans, facilities, and supply chain. On this basis the Inspectorate agrees that this matter can be scoped out from the ES.</p>
3.10.5	Page 188, Section 8.11	Off-site environmental impacts at waste management facilities – all phases	<p>The Scoping Report seeks to scope out off-site environmental impacts at waste management facilities from the pipeline and AGI during all phases. The Scoping Report refers to ISEP guidance indicating that indirect effects associated with off-site waste management and material production facilities are typically assumed to fall within the remit of the separate planning and permitting frameworks governing those facilities. On this basis, the Inspectorate agrees to scope this matter out.</p>

ID	Ref	Description	Inspectorate's comments
3.10.6	n/a	Hazardous waste	The applicant's attention is drawn to the comments of the Environment Agency (see appendix 2 of this Opinion) in relation to the need to adhere to the relevant waste management legislation when handling contaminated materials and disposing of any waste material off site.

3.11 Noise and Vibration

(Scoping Report Section 8.12)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.11.1	Page 197, Section 8.12	Noise emissions: pipelines – operation	<p>On page 194 of the Scoping Report, it is evidenced that because sound cannot propagate from buried pipework or valves, that the below ground pipeline would operate without generating noise. The Scoping Report proposes to scope out an assessment of operational noise emissions from the below ground pipelines. The Report indicates that any operational noise from above ground pipeline elements will be scoped in and on this basis, the Inspectorate agrees that operational noise from underground pipeline is unlikely to result in significant effects and is content that this matter can be scoped out.</p> <p>The Inspectorate directs the applicant's attention to ID 2.0.7 of this Opinion in relation to the assessment of effects from maintenance activities.</p>
3.11.2	Page 197, Section 8.17	Noise emissions: pipelines – decommissioning	<p>As detailed in ID 2.0.8 the uncertainty around decommissioning activities and potential above ground pipeline removal means that the Inspectorate advises that matter should not be scoped out at this stage.</p>
3.11.3	Page 197, Section 8.12	Operational noise emissions: AGI	<p>On page 194 of the Scoping Report, it is stated that noise emissions would be limited to above-ground elements only, where present, such as exposed pipework or valve bodies at AGI, including block valves and/or industrial connections/ regulators and intermittent use of any stacks (where required) for infrequent flaring and/ or venting (as described in Paragraph 4.2.23).</p>

			<p>The Scoping Report proposes to scope out operational noise from the Block Valve Stations as no noise generating plant will be installed above ground at each installation. It is stated that should emergency venting and/ or flaring be required, that emissions would be infrequent, controlled and short term.</p> <p>On the basis that emergency venting and/ or flaring operations are rare, brief, and controlled, the Inspectorate agrees this aspect can be scoped out of further assessment. However, the ES should provide further evidence to support the claim that no noise generating plant will be installed above ground at each installation. The Inspectorate directs the applicant's attention to ID 2.0.7 of this Opinion in relation to the assessment of effects from maintenance activities.</p>
3.11.4	Page 198, Section 8.12	Vibration effects: pipeline – operation	<p>It is proposed that operational vibration be scoped out as the pipeline would be designed to not emit vibration in order to maintain pipeline integrity and condition. The Inspectorate agrees that operational vibration from the underground pipeline is unlikely to result in significant effects and is content that this matter can be scoped out. The Inspectorate directs the applicant's attention to ID 2.0.7 of this Opinion in relation to the assessment of effects from maintenance activities.</p>
3.11.5	Page 198, Section 8.12	Vibration effects: pipeline - decommissioning	<p>It is proposed that decommissioning effects are scoped out as the pipeline will remain in-situ after operation ceases. Elsewhere in the Scoping Report it states that small sections of pipeline may need to be removed. Therefore, the Inspectorate cannot agree to scope out decommissioning at this stage, and further evidence should be provided in the ES.</p>
3.11.6	Page 198, Section 8.12	Vibration effects: AGI - operation	<p>The Scoping Report states that no rotating or reciprocating equipment is proposed that would generate vibration. It is proposed to scope out vibration effects from AGI during operation as there will be no significant effect. The Inspectorate agrees that operational vibration from AGI is</p>

			unlikely to result in significant effects and is content that this matter can be scoped out. The Inspectorate directs the applicant's attention to ID 2.0.7 of this Opinion in relation to the assessment of effects from maintenance activities.
3.11.7	Page 198, Section 8.12	Road traffic noise: pipeline - operation	Road traffic movements during operation of the pipeline is expected to be negligible/ infrequent related to routine maintenance and would not be sufficient to result in any likely significant effects. Subject to confirmation that anticipated operational phase traffic movements would not exceed the thresholds set out in the Design Manual for Roads and Bridges (DMRB) LA 111 – Noise and Vibration, the Inspectorate agrees that effects are unlikely to be significant and that this matter can be scoped out of the ES. The Inspectorate directs the applicant's attention to ID 2.0.7 of this Opinion in relation to the assessment of effects from maintenance activities.
3.11.8	Page 198, Section 8.12	Noise from road traffic: pipeline - decommissioning	It is proposed that decommissioning effects are scoped out as the pipeline will remain in situ after operation ceases. Elsewhere in the Scoping Report it states that small sections of pipeline may need to be removed. Therefore, the Inspectorate cannot agree to scope out decommissioning at this stage, and further evidence should be provided in the ES.
3.11.9	Page 198, Section 8.12	Road traffic Noise: AGI - operation	Road traffic movements associated with the operation of the AGI are expected to be negligible and infrequent and not likely to result in significant effects. The ES should confirm the vehicle types and likely number and routing of vehicle movements required for operation of the proposed development. Provided these do not exceed the relevant screening criteria set out in DMRB LA 111 – Noise and Vibration, the Inspectorate agrees that effects from road traffic noise are not likely and that this matter can be scoped out of the ES. If such confirmation is not possible, an assessment should be provided. The Inspectorate directs the

			applicant's attention to ID 2.0.7 of this Opinion in relation to the assessment of effects from maintenance activities.
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ID	Ref	Description	Inspectorate's comments
3.11.10	Page 195	Study area	<p>Page 195 of the Scoping Report states that there may be noise emissions associated with the operation of mechanical and electrical plant at the AGI. Paragraph 4.2.3 states that AGIs will be constructed at key locations, and that engineering work is currently being undertaken to identify the optimum size and most appropriate locations.</p> <p>Considering that the precise locations are not yet determined, the ES should clarify where all AGI would be located and should identify any nearby sensitive human and ecological receptors which could be impacted by noise generated from above ground infrastructure, assessing any LSEs from all activities.</p>

3.12 Socio-economics

(Scoping Report Section 8.13)

Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.12.1	Page 207, Section 8.13 Employment and supply chain effects: pipeline - decommissioning	The beneficial employment and support chain effects from construction and operation of the pipeline are scoped in. The rationale provided for the proposal that decommissioning effects are scoped out is that the pipeline would remain in-situ. As detailed in ID 2.0.8 the uncertainty around decommissioning activities means that the Inspectorate advises that matter should not be scoped out at this stage.
3.12.2	Page 207, Section 8.13 PRoW use: Pipeline - operation and decommissioning	As the pipeline would be left in-situ during operational use and decommissioning, it is proposed that effects on PRoW at these stages are scoped out. The Inspectorate agrees to scope out operational effects on this basis. The Inspectorate directs the applicant's attention to ID 2.0.7 of this Opinion in relation to the assessment of effects from maintenance activities. As noted in ID 2.0.8, the uncertainty around decommissioning activities means that the Inspectorate cannot agree to scope out decommissioning at this stage.
3.12.3	Page 207, Section 8.13 PRoW use: 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 phases. 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.
3.12.4	Page 208, Section 8.13	Potential indirect effects on local businesses and community facilities – all phases	The potential to generate a temporary rise in use of local businesses and community facilities by construction workers during construction and demolition is considered to be negligible due to the geographic spread of the Proposed Development. During operation it is considered that there would be no effects. It is proposed that indirect effects on local businesses and community facilities at all stages are scoped out. The Inspectorate agrees that the potential for significant effects would be unlikely and is therefore content that this matter can be scoped out.
3.12.5	Page 208, Section 8.13	Development land allocations (including mineral resource) and open space: pipeline - operation and decommissioning.	Development land allocations are found within the Scoping Boundary spreading across its geographical extent. Interactions with development allocations including open space are proposed are to be scoped in for construction but scoped out for operation and decommissioning, as there will be no further interaction with allocations or green space related to the pipeline following construction. In relation to land use in Mineral Safeguarded Areas, it is proposed that this is scoped out as mineral deposits would not be permanently sterilised and no proposals for mineral extraction are identified in the minerals and waste policies. The Inspectorate agrees that the potential for significant effects would be unlikely and is therefore content that this matter can be scoped out.

ID	Ref	Description	Inspectorate's comments
3.12.6	n/a	Tourism	The ES should consider the potential for impacts during construction and maintenance activities on tourism and the second purpose of the North

			York Moors National Park as a result of harm to pedestrian amenity for users of the Cleveland Way National Trail.
3.12.7	n/a	Non-motorised users	The assessment of impacts to non-motorised users (e.g. pedestrians, cyclists, and equestrians) of PRow and the road network should be supported by user counts, and efforts should be made to agree the locations for such counts with relevant consultation bodies. Where relevant, the ES should assess potential interaction effects between aspect assessments, for example noise, air quality, socio-economics, traffic, and visual amenity. The locations of any diversions or closures should be illustrated on suitable figures in the ES.

3.13 Soils and agricultural land

(Scoping Report Section 8.14)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.13.1	Pages 213-214, Section 8.14	Impacts to agricultural land use: pipeline – operation	<p>The Scoping Report proposes to scope out impacts on agricultural land use from the pipeline during operation on the basis that land above the pipeline corridor would be reinstated to its former agricultural use following construction.</p> <p>While the Inspectorate acknowledges that the approximate four-year construction period would not constitute a long-term disruption to agricultural production, sustained effects on BMV land arising from construction activities, such as soil compaction and erosion, may likely extend beyond the construction phase.</p> <p>The ES should therefore assess the potential for such effects to influence the ability of land to return to its former agricultural use and should consider the timescale for full reinstatement and any consequential reduction in agricultural productivity. The Inspectorate also directs the applicant's attention to ID 2.0.7 of this Opinion in relation to the assessment of effects from maintenance activities.</p>
3.13.2	Pages 213-214, Section 8.14	Impacts to agricultural land use: pipeline – decommissioning	<p>Impacts on agricultural land use during decommissioning have been scoped out on the basis that the majority of the pipeline would remain in-situ. However, given the uncertainty regarding any future pipeline removal, as noted in ID 2.0.8, the Inspectorate does not agree to scope out agricultural land use impacts during decommissioning at this stage.</p>

			<p>Furthermore, in the absence of information on the potential decommissioning of the proposed pipeline crossing at Greatham Creek/Seaton on Tees Channel, the Inspectorate cannot agree that impacts on available grazing land would not be significant. The ES should clearly set out how potential impacts on agricultural land use will be assessed during both the operational and decommissioning phases for the pipeline as well as AGI.</p>
3.13.3	Page 214, Section 8.14	Impacts to agricultural holdings – operation	<p>The Scoping Report proposes to scope out impacts to agricultural land holdings from the pipeline and AGI on the basis that agricultural activity would be able to continue throughout operation, and disruption to farm operations and activities would be limited given that the pipeline can be inspected internally using intelligent in-line inspection (ILI) technology. This means that any intrusive maintenance work can be precisely targeted and is likely to be infrequent and limited in extent. The Inspectorate agrees that significant effects are unlikely and is therefore content that this matter can be scoped out of further assessment. However, the Inspectorate directs the applicant’s attention to ID 2.0.7 of this Opinion in relation to the assessment of effects from maintenance activities.</p>
3.13.4	Page 214, Section 8.14	Impacts to agricultural holdings – decommissioning	<p>The Scoping Report proposes to scope out decommissioning effects on agricultural land holdings from the pipeline on the basis that the majority of the pipeline would remain in-situ following operation. Effects arising from decommissioning of the AGI are also proposed to be scoped out on the basis that once the land on which the AGIs are sited is reinstated and returned to the landowners, any changes to the capacity of agricultural holdings would be negligible.</p> <p>However, given the uncertainty regarding any future pipeline removal, as noted in ID 2.0.8, and in the absence of evidence demonstrating agreement with affected landowners regarding the future management of agricultural holdings following AGI decommissioning, the Inspectorate does not agree that impacts on agricultural land holdings can be scoped out at this stage.</p>

3.13.5	Page 215, Section 8.14	Soil carbon impacts – operation	<p>The Scoping Report states that soil carbon emissions result from soil disturbance rather than the presence of infrastructure and therefore proposes to scope out operational effects on soil carbon for both the pipeline and AGI on the basis that operational activities are unlikely to cause significant soil disturbance. While the pipeline can be inspected internally using intelligent in-line inspection (ILI) technology and intrusive maintenance works would be infrequent and limited in extent, insufficient justification has been provided for scoping out operational effects for the AGI. Section 8.14 (page 212) acknowledges that operational activities at the AGIs could result in the loss or degradation of soil resources, which could affect soil carbon stocks. Therefore, where significant effects on soil carbon are likely to occur following construction, these should be assessed within the ES.</p> <p>Furthermore, in the absence of baseline information showing that carbon-rich or organic soils are not present within the affected area, the Inspectorate is not content to scope out operational effects on soil carbon for the pipeline or AGI at this stage.</p> <p>The Inspectorate directs the applicant’s attention to ID 2.0.7 of this Opinion in relation to the assessment of effects from maintenance activities.</p>
3.13.6	Page 215, Section 8.14	Soil carbon impacts for the pipeline - decommissioning	<p>The Inspectorate notes that decommissioning impacts on soil carbon are scoped in for AGI but not for the pipeline on the on the basis that the majority of the pipeline would remain in-situ following operation. However, given the uncertainty about any future pipeline removal, as noted in ID 2.0.8 above, the Inspectorate does not agree to scope out soil carbon impacts for the pipeline during decommissioning at this stage.</p>
3.13.7	Page 215, Section 8.14	Soil resource: operation and decommissioning	<p>The Scoping Report proposes to scope out impacts on soil resources during operation and decommissioning based on the same rationale as ID 3.12.4 and 3.12.5, namely that no significant soil disturbance is expected following construction and that the pipeline would remain in situ at decommissioning. However, Section 8.14 (page 212) acknowledges that operational activities at</p>

			the AGIs could result in the loss or degradation of soil resources. The Inspectorate also notes that the Scoping Report identifies potential effects on soil resources at construction arising from infrastructure removal resulting in leftover voids, and it has not been demonstrated that any such residual ground disturbance or associated effects on soil structure and function would be confined to the construction phase alone. Accordingly, any impacts on soil resources during operation that are likely to result in significant effects should be described and assessed. The Inspectorate directs the applicant's attention to ID 2.0.7 of this Opinion in relation to the assessment of effects from maintenance activities.
3.13.8	Page 215, Section 8.14	Soil resource: pipeline - decommissioning	With regard to decommissioning impacts on soil resources associated with the pipeline, while such impacts have been scoped in for the AGI, the Inspectorate does not agree that they can be scoped out for the pipeline. Given the uncertainty regarding any future pipeline removal, as noted in ID 2.0.10, potential decommissioning effects on soil resources should be assessed within the ES.
3.13.9	Page 215, Section 8.14	Soil health: pipeline and AGI - all phases	The applicant proposes to scope out impacts soil health on the basis that best practice measures to minimise adverse effects would be set out in the Outline Soil Management Plan (oSMP). The Inspectorate agrees to scope out this matter on this basis.

ID	Ref	Description	Inspectorate's comments
3.13.10	Page 212, Section 8.14	Study area	The Scoping Report states that the study area for the assessment of soils and agricultural land will be based on the draft Order Limits once refined down. The ES should provide a clear justification for the extent of the study area chosen and how this relates to the extent of the likely impacts for agricultural land and soils. The study area should be clearly depicted on figures to aid understanding.

3.13.11	n/a	Agricultural Land Classification (ALC) survey	<p>The Scoping Report states that, due to limitations of scale and changes to the ALC classification system, provisional ALC grades require verification through soil surveys to establish definitive agricultural land grades. To ensure an accurate assessment of potential impacts on agricultural land resources, the ES should include a comprehensive ALC survey covering the entire project boundary. This will allow the ES to robustly identify the quality and extent of agricultural land affected and to assess the significance of associated impacts.</p> <p>The ES should contain a clear tabulation of the areas of land in each Best Most Versatile (BMV) classification that would be temporarily or permanently lost as a result of the proposed development, with reference to accompanying map(s) depicting the ALC grades.</p> <p>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 far as possible. Consideration should also be given to the use of BMV land in the applicant’s discussion of alternatives. The applicant’s attention is directed to the comments of Natural England (see appendix 2 of the Opinion) in this regard.</p>
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3.14 Transport and movement

(Scoping Report Section 8.15)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.14.1	Page 220, Section 8.15	Traffic movements – operation	<p>The applicant seeks to scope out the effects from traffic movements from the operational phase, based on the information provided in section 4.10 of the Scoping Report. Subject to confirmation that anticipated operational phase traffic movements would not exceed the thresholds set out in Institute of Sustainability and Environmental Professionals (ISEP) (2023) Guidelines for the Environmental Assessment of Road Traffic and Movement, the Inspectorate agrees that effects are unlikely to be significant and that this matter can be scoped out of the ES. The ES should confirm the vehicle types and likely number and routing of traffic movements required for operation of the proposed development. The ES should also demonstrate that cumulative vehicle movements with other developments would not exceed relevant thresholds.</p> <p>The Inspectorate directs the applicant's attention to ID 2.1.16 of this Opinion in relation to the assessment of effects from maintenance activities. Agreement on should also be sought from the relevant Highways Authority.</p>
3.14.2	Page 220, Section 8.15	Traffic movements – decommissioning	<p>The rationale provided for scoping out traffic movements from the decommissioning phases is that traffic volumes are anticipated to be notably less than construction traffic levels, however all above ground elements, including unspecified sections of pipeline will need to be removed. The Scoping Report states that decommissioning traffic assessed at the time of decommissioning with impacts controlled via the</p>

			<p>DEMP. However, it is considered that as no information has been provided at this stage on anticipated vehicle movements, LSE may occur and, on this basis, the Inspectorate does not agree that decommissioning phased traffic movements can be scoped out.</p> <p>The ES should confirm the vehicle types and likely number and routing of traffic movements required for decommissioning of the proposed development, based on reasonable worst-case assumptions where likely significant effects may occur. If the ES can demonstrate that decommissioning vehicle movements would not exceed the assessment thresholds set out in ISEP Guidelines for the Environmental Assessment of Traffic and Movement (2023), the Inspectorate is content that this matter can be scoped out.</p>
3.14.3	Page 222, Section 8.15	Severance: AGI and pipeline - operation	<p>The Scoping Report proposes to scope out this matter during operation on the basis that there will be low volumes of operational traffic associated with the proposed development. The Inspectorate considers that this approach and the information provided aligns with the linear project advice page. The Inspectorate therefore agrees that this matter can be scoped out of further assessment, subject to the ES confirming the vehicle types and likely number and routing of traffic movements and the type of maintenance visits required, based on a worst-case scenario and a justification as to why this level of operational traffic would not give rise to a significant effect. However, the Inspectorate directs the applicant's attention to ID 2.1.16 of this Opinion in relation to the assessment of effects from maintenance activities.</p>
3.14.4	Page 222, section 8.15	Severance: pipeline - decommissioning	<p>The Scoping Report acknowledges that any increases in traffic flows during the decommissioning stage at AGI could impact severance and as such this matter is scoped in on a precautionary basis. However, community severance for the pipeline during decommissioning is proposed to be scoped out as low traffic volumes are expected, with the</p>

			majority of the pipeline left in-situ. The Inspectorate considers that as there is uncertainty surrounding decommissioning activities as detailed in ID2.0.8, it is not appropriate to scope out severance from the decommissioning phase. The ES should therefore provide an assessment of the LSE.
3.14.5	Page 223, Section 8.15	Road vehicle driver and passenger delay: AGI and pipeline -operation	The Scoping Report proposes to scope out this matter during operation on the basis that there will be low volumes of operational traffic associated with the proposed development. The Inspectorate considers that this approach and the information provided aligns with the linear project advice page. The Inspectorate therefore agrees that this matter can be scoped out of further assessment, subject to the ES confirming the vehicle types and likely number and routing of traffic movements and the type of maintenance visits required, based on a worst-case scenario and a justification as to why this level of operational traffic would not give rise to a significant effect. However, the Inspectorate directs the applicant's attention to ID 2.1.16 of this Opinion in relation to the assessment of effects from maintenance activities.
3.14.6	Page 223, Section 8.15	Road vehicle driver and passenger delay: pipeline - decommissioning	The applicant acknowledges that increases in traffic flows during the decommissioning stage at AGI could impact severance, and as a consequence scope in the potential impacts on a precautionary basis. Based on the majority of the pipeline being left in-situ, decommissioning effects for the pipeline are proposed to be scoped out. The Inspectorate considers that as there is uncertainty surrounding the decommissioning activities, as detailed in ID 2.0.8, it is not appropriate to scope out road vehicle driver and passenger delay from the decommissioning phase. The ES should therefore provide an assessment of the LSE.
3.14.7	Page 223, Section 8.15	Non-motorised user delay: pipeline - decommissioning	The Inspectorate considers that as there is uncertainty surrounding the extent of above ground pipeline and decommissioning activities, as detailed in ID2.0.9 it is not appropriate to scope out non-motorised user

			delay from the decommissioning phases. The ES should therefore provide an assessment of the LSE.
3.14.8	Page 223, Section 8.15	Non-motorised user delay: AGI and pipeline - operation	The Scoping Report proposes to scope out this matter during operation on the basis that there will be low volumes of operational traffic associated with the proposed development. The Inspectorate considers that this approach and the information provided aligns with the linear project advice page. The Inspectorate agrees that this matter can be scoped out of further assessment, subject to the ES confirming the vehicle types and likely number and routing of traffic movements and the type of maintenance visits required, based on a worst-case scenario and a justification as to why this level of operational traffic would not give rise to a significant effect. However, the Inspectorate directs the applicant's attention to ID 2.1.16 of this Opinion in relation to the assessment of effects from maintenance activities.
3.14.9	Page 223, Section 8.15	Non-motorised user amenity: pipeline - decommissioning	The Scoping Report details that with the potential exception of above ground elements which may need to be removed, the pipeline will be left in-situ. Significant numbers of HGV/ LGV movements are not anticipated. The Inspectorate considers that as there is uncertainty around decommissioning activities, as detailed in ID 2.0.8, including above ground pipeline extent and its subsequent removal and the need for HGV/LGV use, it is not appropriate to scope out non-motorised user amenity from the decommissioning phases. The ES should therefore provide an assessment of the LSE.
3.14.10	Page 223, Section 8.15	Non-motorised user amenity: pipeline and AGI - operation	The Scoping Report proposes to scope this aspect out on the basis that there will be low volumes of operational traffic associated with the proposed development. The Inspectorate considers that this approach and the information provided aligns with the linear project advice page. The Inspectorate agrees that this matter can be scoped out of further assessment, subject to the ES confirming the vehicle types and likely

			number and routing of traffic movements and the type of maintenance visits required, based on a worst-case scenario and a justification as to why this level of operational traffic would not give rise to a significant effect. However, the Inspectorate directs the applicant's attention to ID 2.1.16 of this Opinion in relation to the assessment of effects from maintenance activities.
3.14.11	Page 224, Section 8.15	Fear and intimidation: pipeline - decommissioning	The rationale provided to scope this matter out is that the majority of the pipeline will be left in-situ with minor above ground sections that could require removal are not likely to generated significant numbers of HGV/ LGV movements and would be less than construction. The Inspectorate considers that as there is uncertainty surrounding decommissioning activities, as detailed in ID 2.0.8, it is not appropriate to scope out fear and intimidation from the decommissioning phase. The ES should therefore provide an assessment of the LSE.
3.14.12	Page 224, Section 8.15	Fear and intimidation: pipeline and AGI - operation	The Scoping Report proposes to scope out this matter during operation on the basis that there will be low volumes of operational traffic associated with the proposed development. The Inspectorate considers that this approach and the information provided aligns with the linear project advice page. The Inspectorate therefore agrees that this matter can be scoped out of further assessment, subject to the ES confirming the vehicle types and likely number and routing of traffic movements and the type of maintenance visits required, based on a worst-case scenario and a justification as to why this level of operational traffic would not give rise to a significant effect. However, the Inspectorate directs the applicant's attention to ID 2.1.16 of this Opinion in relation to the assessment of effects from maintenance activities.
3.14.13	Page 224, Section 8.15	Road user and pedestrian safety:	The Scoping Report details that minor above ground sections of pipeline that could require removal on decommissioning are not likely to generated significant numbers of HGV/ LGV movements and would be

		pipeline - decommissioning	<p>less than construction. Decommissioning traffic would be controlled via the DEMP.</p> <p>However, it is considered that as there is uncertainty surrounding the extent of above ground pipeline, see ID 2.0.8, it is not appropriate to scope out road user and pedestrian safety from the decommissioning phases. The ES should therefore provide an assessment of the LSE.</p>
3.14.14	Page 225, Section 8.15	Road user and pedestrian safety: AGI and pipeline - operation	<p>The rationale provided to scope out effects of road user and pedestrian safety relating to the proposed development, is that operational activity will be limited and will not materially alter traffic patterns or access arrangements. As such, the operation of the proposed development would not introduce any new road safety risks for motorists or pedestrians. On this basis, the Inspectorate is content this matter can be scoped out of the ES. However, the Inspectorate directs the applicant's attention to ID 2.1.16 of this Opinion in relation to the assessment of effects from maintenance activities.</p>
3.14.15	Page 224, Section 8.15	Road safety audits: pipeline and AGI - all phases	<p>The Scoping Report states that any new or amended access points required to serve the proposed development to and from the public highway would be subject to a Road Safety Audit at the appropriate stage to be agreed with the Local Highway Authority. On this basis, the Inspectorate is content this matter can be scoped out of the ES.</p>
3.14.16	Page 224-5, Section 8.15	Hazardous loads/ large loads: AGI - construction	<p>The Scoping Report details that hazardous loads are not expected to be required at any stage. As long as the ES confirms that no hazardous loads will be required, the Inspectorate is content this matter can be scoped out of the ES.</p> <p>Abnormal Indivisible Loads (AIL) are proposed to be scoped out for AGI in the construction phase. However, the Scoping Report details on page 220 that AIL may be required for the construction period, and that AIL may be</p>

			required to access the site during the construction phase, so this matter will need to be scoped in with a full assessment outlined within the ES.
3.14.17	Page 224-5, Section 8.15	Hazardous/ large loads: pipeline and AGI – operation	<p>The Scoping Report details that hazardous loads are not expected to be required at any stage. As long as the ES confirms that no hazardous loads will be required, the Inspectorate is content this matter can be scoped out of the ES.</p> <p>The Scoping Report also states that AIL are not expected to be required as part of the operation of the proposed development. The Inspectorate is content this matter can be scoped out of the ES for the operational phase.</p>
3.14.18	Page 224-5, Section 8.15	Hazardous/ large loads: pipeline and AGI - decommissioning	<p>The Scoping Report does not provide a clear rationale for scoping out AIL related to AGI decommissioning. The Inspectorate considers that, as it is stated that AIL may be required for AGI construction, then it is reasonable to assume that AIL may also be required for decommissioning AGI. On this basis, the ES should present an assessment of the LSE from this matter.</p>

3.15 Water resources and flood risk

(Scoping Report Section 8.16)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.15.1	Page 242, Section 8.16	Surface water and groundwater quality: pipeline - decommissioning	As detailed in ID 2.0.8 there are issues with inconsistency within the Scoping Report on the extent and locations of above ground pipeline. Paragraph 1 on page 172 says that the pipeline will be fully buried, then on page 173 of the same chapter, it says that above ground sections of the pipework will be removed. The inspectorate considers that the removal of any above ground infrastructure, including any sections of pipeline at the end of the operational life of the proposed development have the potential to give rise to significant effects. The ES must therefore contain a full assessment of the LSE.
3.15.2	Page 242, 8.16	Surface water and groundwater quantity and supply: pipeline - decommissioning	As detailed in ID 2.0.8 there are issues with inconsistency within the Scoping Report on the extent and locations of above ground pipeline. Paragraph 1 on page 172 says that the pipeline will be fully buried, then on page 173 of the same chapter, the report says that above ground sections of the pipework will be removed. The Inspectorate considers that the removal of any above ground infrastructure, including any sections of pipeline at the end of the operational life of the proposed development have the potential to give rise to significant effects. The ES must therefore contain a full assessment of the LSE.
3.15.3	Page 243, Section 8.16	Hydromorphology changes of watercourses: pipeline - decommissioning	As detailed in ID 2.0.8, there are issues with inconsistency within the Scoping Report on the extent and locations of above ground pipeline. Page 172 says that the pipeline will be fully buried and then on page 173 the report says that above ground sections of the pipework will be removed. The Inspectorate considers that the removal of any above ground infrastructure including sections of pipeline at the end of the operational life have the potential to give

			rise significant effects. The ES must therefore contain a full assessment of the LSE.
3.15.4	Page 243, Section 8.16	Water Framework Directive Assessment: pipeline - decommissioning	The applicant proposes to scope out this matter on the basis that the majority of the pipeline would remain in-situ after the operational life of the pipeline, it is anticipated that significant effects are unlikely to occur. However, as detailed in ID 2.0.8 there is uncertainty around the extent and locations of above the ground elements of the pipeline that will need to be removed upon decommissioning. The ES will need to provide clarification of the locations of above ground pipeline with an assessment of whether the decommissioning of the above ground elements could lead to any LSE.

ID	Ref	Description	Inspectorate's comments
3.15.5	Page 234	Flood defences	The Scoping Report details existing flood defences within the Teesside area comprise flood embankments, walls and coastal protection infrastructure associated with the River Tees and its estuary. The Scoping Report does not reference the impact the proposed development may have on flood defences. With reference to the comments from the Environment Agency (see appendix 2 of this Opinion) the Inspectorate recommends that the ES should include an assessment of how the proposed development may impact existing flood defences and commit to any necessary mitigation to reduce the risk to an acceptable level.
3.15.6	Page 239	Flood Zone 3a and 3b -	Page 234 details that the local authority Strategic Flood Risk Assessments (SFRA) has not been accessed to inform the Scoping Report, and therefore the extent of Flood Zone 3a and 3b within the Scoping Boundary is not known at this stage. The ES will need to differentiate between flood zones 3a and 3b in order to determine which parts of the site are located in areas considered as 'high probability of flooding' and 'functional floodplain'. Where development is to be located within flood zone 3, an assessment of the

			<p>floodplain loss should be made and floodplain compensation provided. The applicant's attention is drawn to comments from the Environment Agency (see appendix 2 of this Opinion), which comment on the detail in the Scoping Report provided on flood plain compensation.</p> <p>The Scoping Report details that any infrastructure impacting the floodplain and areas of high and medium flood risk will be accompanied by a mitigation strategy. This approach will only be acceptable if it is demonstrated within the ES that where any residual impacts remain, it is demonstrated that the proposed development does not increase flood risk elsewhere and it maintains catchment scale functionality.</p>
3.15.7	Page 244	Assessment methodology – water quality	<p>The applicant's attention is drawn to comments from the Environment Agency (see appendix 2 of this Opinion) with regards to insufficient information regarding water quality monitoring. A water quality monitoring plan should be provided alongside the ES. This will need to clarify locations, frequency, quantity and possible methods of monitoring. There should be pre-construction, during construction and post-construction phases of water quality monitoring.</p>

3.16 Human Health

(Scoping Report Section 9.1)

ID	Ref	Applicant's proposed aspect to scope out	Inspectorate's comments
3.16.1	Page 277, Section 9.1	Environmental impacts on sensitive receptors	The Scoping Report details that the scale of impacts, taking into account embedded and good practice mitigation measures, are not considered to result in any potential impacts on health outcomes at the population level. Potential impacts on environmental determinants of health will form part of the assessment under other aspect chapters, including air quality, ground conditions, landscape and visual, major accidents and disasters, noise and vibration, transport and movement and the water environment. The ISEP "Guide to Effective Scoping of Human Health in Environmental Impact Assessment" is referenced as part of informing this assessment. On this basis, the Inspectorate is content to scope this out from the ES.
3.16.2	Page 277, Section 9.1	Traffic; Access and connectivity	The Scoping Report details on Page 274 that the route corridor benefits from good connectivity to the strategic road network (SRN) and key A roads, which helps to limit the extent of traffic passing through smaller communities and reduces the potential for disruption to local amenity and quality of life. A construction traffic management plan will minimise disruption and nuisance to pedestrians and non-motorised users. The transport and movement chapter will report on any potential transport-related effects. On this basis, the Inspectorate is content that a separate assessment on human health is not required.

3.16.3	Page 277, Section 9.1	Access to green space and physical activity	The Scoping Report details on page 275 that there will be no overall reduction in access to green space and physical activity for the study area population. A Public Rights of Way Management Plan will be implemented and appropriately agreed with the relevant local authorities. This will contain appropriate monitoring and enforcement arrangements. On this basis, the Inspectorate is content to scope this matter out of further assessment.
3.16.4	Page 278, Section 9.1	Economic and employment impacts	The Scoping Report details that job creation is not considered likely to affect the overall health and wellbeing of local communities in the study area. On the basis, that economic and employment effects will be considered in the socio-economic aspect chapter, the Inspectorate is content to scope this out of assessment.

ID	Ref	Description	Inspectorate's comments
3.16.5	n/a	Human health aspect chapter	<p>A standalone human health ES chapter is proposed to be scoped out on the basis that the proposed development is unlikely to result in impacts to the health outcomes at the population level. Effects on wellbeing and quality of life from economic and employment opportunities are proposed to be considered in the socio-economics ES chapter. The Inspectorate is content that human health does not need to be assessed as a standalone ES aspect chapter. However, human health and wellbeing (for example, health effects arising from impacts to environmental amenity and environment determinants of health) should be considered within relevant ES chapters including noise and vibration, air quality, landscape and visual amenity, traffic and transport, ground conditions and the water environment.</p> <p>To ensure that relevant information can be easily located, the Inspectorate recommends that the EIA methodology ES chapter provides clear cross referencing to where the relevant impacts on human health are considered. The assessment should be informed by relevant guidance such as the ISEP</p>

			2022 guidance 'Determining significance for Human Health in Environmental Impact Assessment'.
3.16.6	n/a	Electric and magnetic fields (EMF)	The UK Health Security Agency have commented that the Scoping Report does not consider possible health impacts of EMF. The Inspectorate requests that the ES provides confirmation that the project does not contain any EMF sources that may have a potential public health impact; or if this not is the case, the ES should contain an appropriate assessment of the possible impacts.

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	Wynyard Parish Council
	Monk Hesleden Parish Council
	Great Ayton Parish Council
	Danby Group Parish Council
	Glaisdale Parish Council
	Roxby Group Parish Council
	Hinderwell Parish Council
	Middridge Parish Council
	Bishopton Parish Council
	Heighington Parish Council
	Etherley Parish Council
	Great Aycliffe Town Council
	Sedgefield Town Council
	Wingate Parish Council
	Shildon Town Council
Windlestone Parish Council	
Bishop Middleham Parish Council	

SCHEDULE 1 DESCRIPTION	ORGANISATION
	Fishburn Parish Council
	Trimdon Parish Council
	Nunthorpe Parish Council
	Greatham Parish Council
	Elwick Parish Council
	Dalton Piercy Parish Council
	Hart Parish Council
	Headland Parish Council
	Lockwood Parish Council
	Loftus Town Council
	Skelton and Brotton Parish Council
	Saltburn, Marske and New Marske Parish Council
	Guisborough Parish Council
	Wynyard Parish Council
	Billingham Town Council
	Carlton Parish Council
	Redmarshall Parish Council
	Stillington and Whitton Parish Council
	Wolviston Parish Council
	Grindon and Thorpe Thewles Parish Council
The Environment Agency	The Environment Agency
Natural England	Natural England
The Forestry Commission	Forestry Commission - Yorkshire & North East

SCHEDULE 1 DESCRIPTION	ORGANISATION
The Historic Buildings and Monuments Commission for England (known as Historic England)	Historic England
The Maritime and Coastguard Agency	Maritime & Coastguard Agency
The Maritime and Coastguard Agency - Regional Office	The Maritime and Coastguard Agency - North East England
The Canal and River Trust	The Canal and River Trust
The relevant Highways Authority	Hartlepool Borough Council
	Durham County Council
	Darlington Borough Council
	Redcar and Cleveland Borough Council
	Stockton-on-Tees Borough Council
	National Highways - Yorkshire & North East
Integrated Transport Authorities (ITAs) and Passenger Transport Executives (PTEs)	Tyne and Wear Passenger Transport Executive (Nexus)
The Health and Safety Executive	Health and Safety Executive
United Kingdom Health Security Agency, an executive agency of the Department of Health and Social Care	United Kingdom Health Security Agency
NHS England	NHS England
The Coal Authority	Mining Remediation Authority

SCHEDULE 1 DESCRIPTION	ORGANISATION
The Crown Estate Commissioners	The Crown Estate
The relevant police authority	Cleveland Police and Crime Commissioner
	Durham Police and Crime Commissioner
The relevant ambulance service	North East Ambulance Service NHS Foundation Trust
The relevant fire and rescue authority	County Durham and Darlington Fire and Rescue Service
	Cleveland Fire Brigade

TABLE A2: RELEVANT STATUTORY UNDERTAKERS

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

STATUTORY UNDERTAKER	ORGANISATION
The relevant Integrated Care Board	NHS North East and North Cumbria Integrated Care Board
	NHS Humber and North Yorkshire Integrated Care Board
NHS England	NHS England
The relevant NHS Foundation Trust	North East Ambulance Service NHS Foundation Trust
Railways	National Highways Historical Railways Estate
Road Transport	Tyne and Wear Passenger Transport Executive (Nexus)
Canal Or Inland Navigation Authorities	The Canal and River Trust

STATUTORY UNDERTAKER	ORGANISATION
Dock and Harbour authority	PD Ports
	PD Ports- Teesport
Universal Service Provider	Royal Mail Group
Homes and Communities Agency	Homes England
The relevant Environment Agency	The Environment Agency
The relevant water and sewage undertaker	Northumbrian Water
The relevant public gas transporter	Cadent Gas Limited
	Northern Gas Networks Limited
	Scotland Gas Networks Plc
	Southern Gas Networks Plc
	CNG Services Ltd
	Energy Assets Pipelines Limited
	ES Pipelines Ltd
	Fulcrum Pipelines Limited
	GTC Pipelines Limited
	Harlaxton Gas Networks Limited
	Independent Pipelines Limited
	Indigo Pipelines Limited
	Inovyn Enterprises Ltd
	Last Mile Gas Ltd
Leep Gas Networks Limited	

STATUTORY UNDERTAKER	ORGANISATION
	Mua Gas Limited
	Quadrant Pipelines Limited
	Stark Infra-Gas Limited
	National Gas
The relevant electricity generator with CPO Powers	MGT Teesside Limited
	Sembcorp Utilities (UK) Limited
	SUEZ Recycling and Recovery UK Limited
	Net Zero Teesside Power Limited
	Sofia Offshore Wind Farm Limited
	Dogger Bank Offshore Windfarm Project 3 Project Limited
	Lightsource BP
	Teesside Windfarm Limited
	EDF Development Company Limited
	Whitetower Energy Limited
	RWE Renewables UK Solar and Storage Limited
	Alfanar Energy Limited
The relevant electricity distributor with CPO Powers	Northern Powergrid (Northeast) Limited
	Advanced Electricity Networks Ltd
	AGR Networks Ltd
	Aidien Ltd
	Aurora Utilities Ltd
	Edge Utility Networks Ltd

STATUTORY UNDERTAKER	ORGANISATION
	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
	UK Power Distribution Limited
	Utility Assets Limited
The relevant electricity transmitter with CPO Powers	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
Yorkshire Dales National Park Authority
North York Moors National Park Authority
Northumberland County Council
Gateshead Metropolitan Borough Council
Hartlepool Borough Council
Durham County Council
North Yorkshire Council
Westmorland and Furness Council
Sunderland City Council
Darlington Borough Council
Middlesbrough Borough Council
Redcar and Cleveland Borough Council
Stockton-on-Tees Borough Council

TABLE A4: THE MARINE MANAGEMENT ORGANISATION

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

ORGANISATION
The Marine Management Organisation

TABLE A5: NON-PRESCRIBED CONSULTATION BODIES

ORGANISATION
Tees Valley Combined Authority
York and North Yorkshire Combined Authority
North East Combined Authority
South Tees Development Corporation
Hartlepool Development Corporation
Middlesbrough Development Corporation
Potential future Development Corporations

APPENDIX 2: RESPONDENTS TO CONSULTATION AND COPIES OF REPLIES

CONSULTATION BODIES WHO REPLIED BY THE STATUTORY DEADLINE:
Alfanar Energy Limited
Bishop Middleham Parish Council
Cleveland Police and Crime commission – Yorkshire and North East
Durham County Council
Forestry Commission – Yorkshire and North East
Gateshead Metropolitan Borough Council
Hartlepool Borough Council
Historic England
Loftus Town Council
Marine Management Organisation
Middlesborough Borough Council
Mining Remediation Authority
National Gas
National Grid Electricity Transmission PLC
National Highways
Natural England
North York Moors National Park Authority
Northumberland County Council
PD Ports - Teesport
Redmarshall Parish Council
Royal Mail Group

Sembcorp Utilities (UK) Ltd
Sphere Energy Connect Ltd
Stillington and Whitton Parish Council
Sunderland City Council
The Canal and River Trust
The Environment Agency
The Maritime and Coastguard Agency
Tyne and Wear Passenger Transport Executive
United Kingdom Health Security Agency
Yorkshire Dales National Park Authority

Alfanar Energy Limited
1-6 Lombard Street
London
England
EC3V 9AA

24 June 2026

Your ref: EN0710010

Dear [REDACTED]

Response by Alfanar Energy Limited and LGF Projects Limited to the EIA Scoping Report for the East Coast Hydrogen Teesside Pipeline project.

We write in reference to your letter dated 29 May 2026 inviting Alfanar Energy Limited to comment on the Environmental Impact Assessment ('EIA') Scoping Report in respect of the Development Consent Order (DCO) application being prepared for the East Coast Hydrogen Teesside Pipeline project.

For clarity, the East Coast Hydrogen Teesside Pipeline project interfaces with our Lighthouse Green Fuels Project (EN0110025). The Lighthouse Green Fuels Project is project of national significance requiring a DCO which is being promoted by LGF Projects Limited, a wholly owned subsidiary of Alfanar Energy Limited.

This submission is made on behalf of Alfanar Energy Limited and LGF Projects Limited, hereafter referred to as "Alfanar".

Alfanar has an interest in the land which is located within the Indicative Site Layout (as shown on Figure 4.1).

We wish to offer the following comments:

1. We note the acknowledgement in Table A-2 which includes the Lighthouse Green Fuels Project within the initial long list of developments. Alfanar confirms there is a large overlap between the Indicative Site Layout (as shown on Figure 4.1) and the proposed Order Limits of the Lighthouse Green Fuels Project. There will need to be a detailed assessment of the impacts of the East Coast Hydrogen Teesside Pipeline project on the Lighthouse Green Fuels Project.

There will be a need for further discussions between Alfanar and Northern Gas Networks to agree interface requirements and the provision of adequate protection to the Lighthouse Green Fuels Project.

2. Alfanar welcomes the commitment to robust consultation as set out in Section 6 of the Scoping Report. Alfanar should be included in consultation activities as soon as possible given the large interface between the projects and overlap of construction periods. The timings of works would need to be closely co-ordinated with Alfanar. Alfanar want to participate proactively and positively in this process. We therefore formally request that Northern Gas Networks invites us to provide input into the appraisal and decision-making process on the Proposed DCO Boundary given this closely relates to the on-going Lighthouse Green Fuels Project.

3. Alfanar wish to engage further with Northern Gas Networks to ensure that the full list of cumulative schemes is kept up to date, that the scope of any cumulative assessment is appropriate, and to ensure that the development proposed is assessed accurately within any subsequent Environmental Assessment.

4. We acknowledge that the East Coast Hydrogen Teesside Pipeline project is in the early stages of development and that the detail provided in the Scoping Report requires further refinement and clarity prior to consultation on the environmental information on the findings of preliminary assessments which is expected in 2027.

We note that the Scoping Report references that the final draft Order Limits are expected to be set at around 100m wide, with a minimum working width corridor of approximately 35m and additional working width needed at some crossings. We consider this to be too wide but would welcome discussion Northern Gas Networks as to the reasoning behind these parameters. We also note that references are made to the construction of AGIs but the proposed locations of these are not clear. Again, Alfanar requires further details on this to comment.

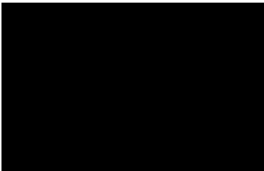
It is crucial that Alfanar participates in discussions with the Northern Gas Networks and its advisors, regarding the refinement of their Proposed DCO Boundary and the extent of land required for constructing and operating the East Coast Hydrogen Teesside Pipeline project.

We, consider it necessary for Northern Gas Networks to carry out immediate engagement with Alfanar over the interaction of the East Coast Hydrogen Teesside Pipeline project with the Lighthouse Green Fuels Project to allow an appropriate period for refinement prior to the submission of their draft DCO documentation to PINS.

It is expected that the finalisation of the extent of the pipeline routes and corresponding reduction in Northern Gas Networks' Proposed DCO Boundary will give sufficient clarity to enable Alfanar to fully understand and assess the impacts of the development and to be satisfied that there would be no unacceptable implications on the Lighthouse Green Fuels Project. Alfanar has contacted Northern Gas Networks directly to ensure that the necessary engagement takes place.

Many thanks again for consulting Alfanar at this stage and we look forward to working with you and Northern Gas Networks to resolve our concerns.

Yours sincerely



East Coast Hydrogen Teesside Pipeline - Scoping Consultation
Planning Inspectorate Ref: EN0710010
Deadline: 25 June 2026

Dear Sir/Madam,

Thank you for inviting Bishop Middleham Parish Council to comment as a prescribed consultation body under Regulations 10 and 11 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017.

We understand that this stage of the process relates only to the scope and level of detail required for the Environmental Statement (ES) for the proposed East Coast Hydrogen Teesside Pipeline.

As no detailed route alignment has yet been published, it is not possible to confirm whether the development may affect Bishop Middleham, Mainsforth, or nearby settlements. Our comments therefore focus on the environmental topics and assessment requirements that we consider essential for inclusion in the ES.

1. Clear route mapping and settlement proximity

The ES should provide:

- Detailed route plans showing proximity to all settlements, including small rural villages.
- Identification of any land within or close to parish boundaries.
- Plans showing temporary construction compounds, access routes, and any above-ground installations.

This information is vital for understanding potential impacts on rural communities.

2. Agricultural land and rural landscape

Given the predominantly agricultural nature of the parish, the ES should assess:

- Temporary and permanent loss of agricultural land.
- Effects on farm operations, drainage, soil quality, and access to fields.
- Landscape and visual impacts, particularly from above-ground infrastructure such as block valve stations.

3. Public rights of way, footpaths, and bridleways

The parish has an extensive network of public rights of way. The ES should include:

- A full inventory of affected PRowS.
- Assessment of temporary closures, diversions, and long-term impacts on accessibility and recreation.
- Mitigation measures to maintain safe access during construction.

4. Construction traffic and road safety

Local roads are narrow and not designed for heavy construction vehicles. The ES should assess:

- Proposed construction traffic routes and expected vehicle volumes.
- Impacts on road safety, congestion, and road condition.
- Cumulative effects alongside other infrastructure or development traffic in County Durham.

5. Ecology, biodiversity, and watercourses

The parish contains sensitive habitats, including watercourses, hedgerows, and wildlife corridors.

The ES should include:

- Comprehensive ecological surveys covering protected species and priority habitats.
- Assessment of impacts on watercourses, drainage, and flood risk.
- Proposals for habitat protection, reinstatement, and biodiversity net gain.

6. Noise, vibration, and construction disturbance

The ES should assess:

- Noise and vibration impacts on nearby homes and the wider rural environment.
- Working hours, lighting, and general construction disturbance.
- Measures to minimise disruption to residents and local amenity.

7. Cumulative and in-combination effects

The ES should consider:

- Interaction with other infrastructure projects in County Durham.
- Combined effects on landscape, traffic, and community amenity.

8. Community engagement

Given the rural nature of the area, the ES should set out:

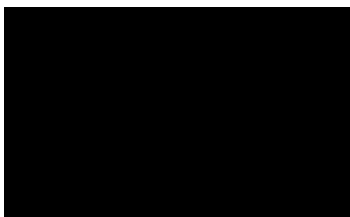
- How the applicant will engage with parish councils and local residents once route options are refined.
- How information will be shared with smaller communities that may not be reached effectively through standard consultation methods.

Conclusion

Bishop Middleham Parish Council asks that all of the above matters are fully addressed within the Environmental Statement. We would welcome early engagement from the applicant once more detailed route information becomes available.

Please acknowledge receipt of this response. We understand that it will be appended to the Scoping Opinion and published on your website in line with your openness policy.

Kindest regards



Parish Clerk



Police and Crime Commissioner for Cleveland
C/o St Marks House
St Marks Court
Thornaby
Stockton on Tees
TS17 6QW

Email: pcc.office@cleveland.police.uk
Website: www.cleveland.pcc.police.uk

Police and Crime Commissioner:
Chief Executive and Monitoring Officer:

██████████
██████████

Tel: ██████████
Tel: ██████████

25th June 2026

Your Ref: EN0710010

Sent by email only: eastcoasthydrogenteesside@planninginspectorate.gov.uk

Dear Planning Inspectorate,

East Coast Hydrogen Teesside Pipeline – Scoping Consultation Response

Thank you for the opportunity to comment on the scope of the Environmental Statement (ES) for the proposed East Coast Hydrogen Teesside Pipeline.

We are responding in our capacity as a prescribed consultee as the Local Policing Authority for the Cleveland Police area. Our comments are therefore focused on matters relating to community safety, resilience, emergency preparedness and the potential implications for policing and partner agencies.

At this stage, the Office of the Police and Crime Commissioner for Cleveland has no specific comments regarding the environmental assessments proposed. However, we would encourage the ES to consider the following matters.

We would expect consideration to be given to the potential designation of the proposed pipelines as Major Accident Hazard Pipelines under the Pipeline Safety Regulations 1996 and the associated emergency planning requirements. The ES should clearly describe the potential risks associated with the transportation of hydrogen, the mitigation measures proposed, and the arrangements for responding to any significant incident.

Whilst current legislation requires the preparation of pipeline emergency plans where applicable, there is no corresponding statutory requirement to exercise those plans. We would therefore welcome consideration of how emergency preparedness, training and multi-agency response arrangements will be supported throughout the operational lifetime of the development.

The ES should also assess any impacts associated with the proposed route, above-ground installations and associated infrastructure, particularly where these may affect local communities, critical infrastructure, transport networks or emergency service access and response arrangements.

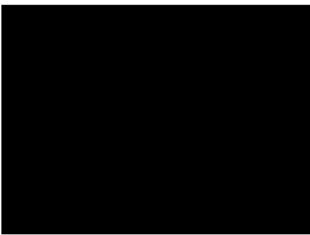
Given the strategic importance of hydrogen infrastructure, consideration should also be given to the security and resilience of the pipeline network, control facilities and above-ground installations. We would expect appropriate security measures to be considered and implemented commensurate with the nature and importance of the infrastructure.

We would encourage continued engagement with the Cleveland Local Resilience Forum and relevant Category 1 and Category 2 responders as proposals develop. Northern Gas Networks has an established relationship with local resilience partners and we would anticipate ongoing information sharing and engagement throughout the development process.

Finally, we would welcome opportunities for emergency responders and partner agencies to receive appropriate briefings, awareness raising and training relating to the specific characteristics and risks associated with hydrogen infrastructure and incidents.

We trust these comments are helpful in informing the scope of the Environmental Statement and look forward to continued engagement as the project develops.

Yours sincerely,



Chief Executive and Monitoring Officer

Contact: [REDACTED]
Direct Tel: [REDACTED]
email: [REDACTED]@durham.gov.uk
Our ref: AACON/26/01219



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

eastcoasthydrogenteesside@planninginspectorate.gov.uk

25 June 2026

Dear Sir/Madam

Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017

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 Teesside Pipeline 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 Teesside Pipeline
For The Planning Inspectorate

Thank you for your letter dated 29 May 2026 in which you consult Durham County Council (DCC) in response to a Scoping Opinion request made to you regarding the above proposed development.

It is expected that the information required by the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) is included in any Environmental Statement (ES) submitted. The ES must therefore include the information set out in Regulation 14(2) and meet the requirements of Regulations 14(3) and 14(4) of the EIA Regulations. It must also include the information set out in Schedule 4 of the EIA Regulations that is relevant to the specific characteristics of the particular development or type of development and to the environmental features likely to be significantly affected.

Regeneration, Economy and Growth

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

Scope of the Environmental Statement

Within the Scoping Report (May 2026) for the East Coast Hydrogen Teesside Pipeline Scoping it is noted that the applicant provides an indicative outline ES structure and identifies the expected environmental topics that would be considered and 'scoped in' and 'scoped out'. In addition, it is noted that certain elements for each 'scoped in' topic are 'scoped out' of the assessments.

Topics proposed to be 'scoped in'

- Air Quality
- Biodiversity and ecology
- Climate change and resilience
- Cultural heritage
- Greenhouse gases
- Ground conditions
- Landscape and visual amenity
- Major accidents and disasters
- Marine biodiversity
- Material assets and waste
- Noise and vibration
- Socio-economics
- Soils and agricultural land
- Transport and movement
- Water resources and flood risk

Topics proposed to be 'scoped out':

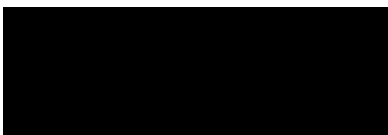
- Human health

In terms of human health, it is recommended that human health impacts be summarised within a dedicated chapter of the ES noting the requirements of Regulation 5(2) and Schedule 4, Paragraphs 4 and 5 of the 2017 Regulations.

Specialist teams from within the Council have been consulted and their comments are set out in Appendix 1 below.

It is appreciated that it is for the Planning Inspectorate to provide the Scoping Opinion and to decide the acceptability of the approach proposed by the applicant to the ES, but regard should also be had to comments received from relevant consultation bodies.

Yours faithfully



Principal Planning Officer

Enc.

- Appendix 1 – Durham County Council Comments

Durham County Council Comments

Air Quality

The proposed pipeline would run along the southern edge of the County from Newton Aycliffe industrial estate in an eastern direction towards the industrial complexes in Teesside. A relatively short section of the pipeline would be located within Durham's boundary, but it would have to pass under the A1(M) and east coast mainline within the section proposed in the district.

Given the type of development being proposed local air quality impacts would be limited to the construction stage and could be mitigated in much the same way as any other major building project. The contractors would be expected to comply with a Construction Management Plan designed to control emissions of dust and particulate matter during the construction stage. I would expect these types of air quality impacts on local receptors within Durham (and other local authority areas where the pipeline passes) during the construction phase to be scoped into the EIA for the project.

Depending on how the electricity used to produce the hydrogen in the pipeline is generated, the companies that switch from natural gas to hydrogen as a fuel source for their industrial processes in Aycliffe could ultimately produce less greenhouse gases because of the development. However, consideration of air quality impacts like this would generally be beyond the scope of a Local Authority air quality considerations. DCC would not expect to comment on this aspect of 'air quality' associated with the development in future consultations.

Biodiversity and ecology

The North Pennine Moor SPA should ideally be scoped in, although it lies outside of the 10km study area for International statutory designated sites it would be prudent to scope it in.

Ancient woodlands were identified using Natural England's AW Inventory, DCC would recommend using Durham County Council's AW Inventory as it is more accurate than the national dataset (this will apply to the Preliminary Ecological Appraisal

Cultural heritage

The proposed route runs from the County boundary through to Newton Aycliffe. There are a number of designated and non-designated heritage assets which may potentially lie within the boundary of the route, as well as further heritage assets whose setting may be affected by this development.

Notably the route may potentially overlap with the scheduled monument at Preston le Skerne (deserted village 1002335), as well as cross the historic route of the Stockton and Darlington Railway. This route would be considered a non-designated heritage asset, covering the route itself, as well as above ground assets and potential below ground archaeology associated with the 200 year old railway line.

Future assessment should also include the assessment on the significance of any further heritage assets within the site boundary as well as the impacts on the settings of assets

within an appropriate radius of the application site in line with Historic England guidance on the setting of heritage assets.

Archaeology

Chapter 8.5 of the Scoping report has included a baseline assessment of the route, and furthermore detailed assessment is proposed, starting with a desk based assessment. DCC question the assumption that decommissioning will have no impacts. Unless it is set now that the same compound, access, lay down areas etc areas are used, then future decommissioning could have impacts if new locations are chosen for those activities, and this should be considered in the assessment. Apart from this point, the proposed assessment methodology would be suitable for the scheme.

Ground conditions

The available information and historical maps with respect to land contamination have been assessed.

Due to the scale of the development and the presence of potentially contaminated land onsite, had this been an application for determination by DCC the following contaminated land requirements would be applied to any grant of planning permission:

Contaminated Land (Phase 1-3)

No development shall commence until a land contamination scheme has been submitted to and approved in writing by the Local Planning Authority. The submitted scheme shall be compliant with the YALPAG guidance and include a Phase 1 preliminary risk assessment (desk top study).

If the phase 1 assessment identifies that further investigation is required a Phase 2 site investigation shall be carried out, which shall include a sampling and analysis plan. If the Phase 2 identifies any unacceptable risks, a Phase 3 remediation strategy shall be produced and where necessary include gas protection measures and method of verification.

Reason: To ensure that the presence of contamination is identified, risk assessed and proposed remediation works are agreed in order to ensure the site is suitable for use, in accordance with Part 15 of the National Planning Policy Framework. Required to be pre-commencement to ensure that the development can be carried out safely.

Contaminated Land (Phase 4)

Remediation works shall be carried out in accordance with the approved remediation strategy. The development shall not be brought into use until such time a Phase 4 verification report related to that part of the development has been submitted to and approved in writing by the Local Planning Authority.

Reason: To ensure that the remediation works are fully implemented as agreed and the site is suitable for use, in accordance with Part 15 of the National Planning Policy Framework.

The following should be added as an informative:

If unforeseen contamination is encountered, the Local Planning Authority shall be notified in writing immediately. Operations on the affected part of the site shall cease until an investigation and risk assessment, and if necessary a remediation strategy is carried out in accordance with the YALPAG guidance and agreed with the Local Planning Authority. The development shall be completed in accordance with any amended specification of works.

Note: Following the submission of a preliminary ground gas risk assessment, for some developments the Local Planning Authority may agree in writing to the installation of Gas Protection Measures as a precautionary measure without first carrying out ground gas monitoring.

Noise and vibration

Given the type of development being proposed, most local amenity impacts should be limited to the construction stage and could be mitigated in much the same way as any other major building project. The building contractors would be expected to comply with a Construction Management Plan designed to control emissions of noise during the construction stage. DCC would expect these types of noise impacts on local receptors within Durham (and other local authority areas where the pipeline passes) during the construction phase to be scoped into the EIA for the project.

The plans on the applicant's website appear to show an above ground facility connecting to the pipeline at the northern end of Aycliffe industrial estate just south of School Aycliffe. Any noise resulting from this facility would need to be assessed, and suitable noise mitigation installed prior to the pipeline becoming operational if this was required. These types of considerations around noise from any above ground installations associated with the pipeline should be scoped into the EIA for the project.

Transport and movement

Given the distance from any roads under the jurisdiction of DCC as Local Highway Authority, the impact of this project on the DCC local road network is considered to be negligible.

It appears that there would be a need for some infrastructure such as pipes to be placed into highways within Durham. This work could be mitigated with a Construction Management Plan and the necessary permissions from the Local Highway Authority to work within the highway.

The proposal is likely to impact on Public Rights of Way and a number of considerations must be followed. Excavation of public rights of way must be restored to the same or better standard after works takes place. Surfacing details should be approved by the PROW team before any changes are made during restoration as they may be detrimental to the public path users. If the legal line of the path is being impacted by the works then a Temporary Closure may well be necessary for the works and there is a lead time for 8 weeks for these to be implemented for planned works.

Water resources and flood risk

It is advised that a surface water management plan should be submitted for the proposed temporary and permanent works.

Trees

Arboricultural impact assessments/method statements may be required.

General

All elements of the proposed development should be clearly described and fully assessed as currently there is little information.

It is understood that one above ground installation is currently proposed just to the east of School Aycliffe and this would likely be located where a facility is already located. Due to the scale of the plan available it is uncertain whether this would lie within County Durham or Darlington Borough Councils area, but it is presumed to be land to the south of School Aycliffe Lane, where land to the north accommodates a range of leisure uses related and land identified in the County Durham Open Space Needs Assessment (OSNA).

Whilst it is noted that the pipeline route is only currently being investigated and therefore indicative at this stage that:

- the above ground installation would potentially lie in the vicinity of land used for leisure related uses in the OSNA;
- the pipeline would need to cross the historic route of the Stockton and Darlington Railway which is also the alignment of the Darlington to Bishop Auckland Railway, cross Aycliffe Industrial Estate, cross the A167, cross the A1(M) and cross the River Skerne. It would need to transverse areas of open countryside east of Newton Aycliffe within which there are numerous public rights of way, areas of land are designated as Areas of Higher Landscape Value, as Mineral Safeguarding Areas, that contains Scheduled Ancient Monuments and contains land which is identified by Natural England as Grade 3 agricultural land and by the Environment Agency as a Groundwater Source Protection Zone III.

Appendix A: Cumulative effects assessment

Table A-2 Initial Long List of Developments

There are two NSIPs not listed which are at the pre-application stage which potentially have cumulative effects with the proposed development but outside of the 10km study zone. These being the Morven Hawthorn Pit Grid Connection Project (EN0210005) and Hope Moor Wind Farm (EN0110038). Hope Moor Scoping Report states that initial feasibility work to date has identified feasible routes to the site from Able Seaton Port and Teesport.

For the planning applications listed it would be helpful if this list provided addresses and local authority areas.

Details of applications made to Durham County Council are available to view on the Council's website at <https://publicaccess.durham.gov.uk/online-applications/search.do?action=simple&searchType=Application>

The statutory development plan for County Durham is the County Durham Plan (CDP), the Minerals and Waste Policies and Allocations Plan, together with 'made' Neighbourhood Plans. These can be found on the Council's website at <https://www.durham.gov.uk/article/3266/Development-Plan-for-County-Durham>

The CDP Proposals Map showing allocations is available at

<https://durhamcounty.maps.arcgis.com/apps/instant/sidebar/index.html?appid=98d8317175a445b98709b7a50815067e>

From: FS, Yorkshire and North East Area <yne@forestrycommission.gov.uk>

Sent: 25 June 2026 23:59

To: East Coast Hydrogen Pipeline – Teesside

<eastcoasthydrogenteesside@planninginspectorate.gov.uk>

Subject: Re: EN0710010 - East Coast Hydrogen Teesside Pipeline - EIA Scoping and Consultation and Regulation 11 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)

Ancient woodlands, ancient trees and veteran trees, are irreplaceable. They have great value because they have a long history of woodland cover, being wooded since at least 1600AD, with many features remaining undisturbed, including immensely complex ecological processes, above and below the ground. This applies equally to Ancient Semi Natural Woodland (ASNW), Plantations on Ancient Woodland Sites (PAWS), ancient trees and veteran trees (AVT).

It is Government policy to refuse development that will result in the loss or deterioration of irreplaceable habitats including ancient woodlands, ancient trees and veteran trees, unless “**there are wholly exceptional reasons and a suitable compensation strategy exists**” (National Planning Policy Framework paragraph 186c). It is not possible to fully compensate for the loss of an irreplaceable habitat, therefore measures should be in place to **ensure that no loss or deterioration** occurs to the identified irreplaceable habitats, as a result of the development.

As noted in the East Coast Hydrogen Teesside Pipeline Scoping Report there are ten parcels of ancient woodland, recorded in Natural England's Ancient Woodland Inventory (AWI), within the Scoping Boundary, and at least seven trees recorded in the Woodland Trust's Ancient Tree Inventory (ATI, an inventory of ancient, veteran and notable trees). The Biodiversity and Ecology Scope and Methodology section identifies a further seventeen ancient woodlands within 500m of the Scoping Boundary, however the Irreplaceable and Priority Habitats Within 500m of the Scoping Boundary section records that there are 82 parcels of ancient woodland.

The precise number of ancient woodlands within the Scoping Boundary, and within 500m of the Scoping Boundary, should be clarified, ensuring that the most up to date AWI is used. The ATI should not be considered an exhaustive dataset of all ancient and veteran trees, and an arboricultural assessment should be undertaken to identify all ancient and veteran trees within the Scoping Boundary or potentially impacted by the development.

Section 4.3.4 of the Scoping Report states that "The loss of AW (ancient woodland) will be avoided and where this is not possible, the loss of these features will be minimised.". This is also stated to apply to ancient trees and veteran trees. Government policy does not support the loss of ancient woodland, ancient trees or veteran trees due to development, in the absence of robustly demonstrated, "wholly exceptional reasons".

The Biodiversity and Ecology Scope and Methodology section of the Scoping Report states that the Design Principles will incorporate embedded measures to mitigate any potential adverse ecological effects arising from the proposed development. The proposed embedded measure for ancient woodland, ancient trees and veteran trees, in accordance with precautionary advice, is to seek to maintain a 50m buffer "where reasonably practicable", and 15m where "not reasonably practicable".

While the Forestry Commission supports the precautionary embedded measure of a 50m buffer, it should be noted that the standing advice sets out that the size and type of buffer zone should vary depending on the scale and type of development and its effect on ancient woodland, ancient trees and veteran trees, and the character of the surrounding area. For example larger buffer zones are more likely to be needed if the surrounding area is less densely wooded, close to residential areas, or steeply sloped. Where assessment shows impacts are likely to extend beyond 15m, proposals will need larger buffer zones. Government policy does not support loss or deterioration of irreplaceable habitat to development where adequate buffer zones are "not reasonably practicable", it should only be considered where "wholly exceptional reasons" can be demonstrated.

The primary purpose of buffer zones is to avoid loss or deterioration of ancient woodland, ancient trees and veteran trees, and therefore an assessment will be required to establish the actual minimum buffer zones required, to avoid this. All assessments should take into account direct, indirect and cumulative effects arising during construction, operation, maintenance and decommission. Where possible buffer zones should also contribute to wider ecological and green infrastructure networks, and consist of semi-natural habitats such as woodland, or a mix of scrub, grassland, heathland and wetland. Proposals should also include creating or establishing habitat with local and appropriate native species within buffer zones.

Where horizontal directional drilling (HDD) is to occur close to/underneath watercourse/woodlands, consideration should be given to the potential impacts of changes to groundwater levels and qualities. Even temporary dewatering has the potential to cause irreversible deterioration of hydrologically sensitive ancient woodland habitats where groundwater or soil moisture regimes are altered. Much of the ancient woodland within the Scoping Boundary is riparian in nature and is particularly sensitive to changes in the hydrological environment.

Standing Advice for Ancient Woodland, Ancient Trees and Veteran Trees

Natural England and the Forestry Commission have published standing advice on ancient woodland, ancient trees and veteran trees, which should be consulted where development occurs close to these irreplaceable habitats. 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 more detailed information on mitigation, including the use of buffers. Further technical information is set out in Natural England and Forestry Commission's [Standing Advice on Ancient Woodland](#) – plus supporting [Assessment Guide](#) and [“Keepers of Time” – Ancient and Native Woodland and Trees Policy in England](#).

Priority Habitats

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 Act 2006, as amended by the Environment Act 2021, public authorities exercising functions in relation to England (including under the planning system) must consider what action they can properly take to further the conservation and enhancement of biodiversity and take appropriate action consistent with the proper exercise of their functions.

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 states 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 tree or 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 and tree canopy loss or deterioration, 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.

Many thanks,



Local Partnership Advisor

Yorkshire and North East Area

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

YO1 7PX

Tel 0300 067 4900

Date: 25 June 2026
Our ref: EIASCO/26/04
Your ref: EN0710010

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

For the attention of: [REDACTED]

By email to: eastcoasthydrogenteesside@planninginspectorate.gov.uk

Dear [REDACTED]

**DEVELOPMENT CONSENT ORDER (DCO) - EIA SCOPING OPINION
REQUEST - GATESHEAD COUNCIL CONSULTATION IN RESPECT OF
AN EIA SCOPING OPINION REQUEST SUBMITTED TO THE PLANNING
INSPECTORATE IN RELATION TO EAST COAST HYDROGEN TEESIDE
PIPELINE**

**(EIA) SCOPING CONSULTATION AND NOTIFICATION OF
ENVIRONMENTAL IMPACT ASSESSMENT.**

Thank you for your letter dated 29 May 2026.

I understand that the applicant has asked the Planning Inspectorate on behalf of the Secretary of State for its opinion (a scoping opinion) as to the information to be provided in the Environmental Statement for the proposed development which is a Nationally Significant Infrastructure Project. It is noted that the proposed development is currently in the pre-application stage.

I have reviewed the information accompanying the request for a scoping opinion, via the link contained in your letter, and can confirm that Gateshead Council has ***no comments*** to make about the information to be provided in the Environmental Statement in this instance. This is because the site and proposed development is a significant distance from the administrative boundary of Gateshead Council.

Should you wish to discuss this response further then please contact me at
[REDACTED]@gateshead.gov.uk .

Yours sincerely

[REDACTED]
Senior Planner
Development Management
Climate Change, Compliance, Planning and Transport
Economy Innovation and Growth
Gateshead Council

**Development, Neighbourhoods &
Regulatory Services**

Email: developmentcontrol@hartlepool.gov.uk

Civic Centre Level 1
Hartlepool TS24 8AY

Tel: 01429 266522
DX60669 Hartlepool-1



Our Ref: H/2026/0178

Your Ref: EN0710010

Contact Officer: [REDACTED]  [REDACTED]

25 June 2026

PLANNING INSPECTORATE
ENVIRONMENTAL SERVICES
INFRASTRUCTURE DECISIONS AND APPLICATIONS SERVICE
C/O QUADIENT
69 BUCKINGHAM AVENUE
SLOUGH
SL1 4PN

Dear Sir/Madam

TOWN AND COUNTRY PLANNING ACT 1990

**PROPOSAL: Adjoining Authority Consultation for a scoping opinion for the
East Coast Hydrogen Teesside Pipeline**

LOCATION: EAST COAST HYDROGEN TEESSIDE PIPELINE TEESSIDE

I refer to the above noted application.

Having viewed the supporting documentation in respect of the EIA Scoping and Consultation and Regulation 11 Notification, I have set out the responses I have received from various Hartlepool Borough Council technical consultees below for your consideration:

HBC Engineering Consultancy

The proposed development is a Nationally Significant Infrastructure Project (NSIP), currently in the pre-application stage.

An Environmental Impact Assessment (EIA) Scoping Report has been submitted as expected.

Given that the project constitutes a Nationally Significant Infrastructure Project (NSIP) and the Council has been included as a consultee, the following comments have been provided.

The development comprises a utility corridor, specifically the East Coast Hydrogen Teesside Pipeline. Sections of the route pass through areas identified as Flood Zones 2 and 3. It is essential that both construction and operational phases of the development do not increase flood risk elsewhere, irrespective of whether works are located within or outside designated flood zones.

A Flood Risk Assessment (FRA) and an Outline Drainage Strategy are proposed to be submitted in accordance with national standards and relevant local guidance, as set out within the Environmental Impact Assessment (EIA) Scoping Report.

These documents will accompany the applicant's future development planning application and will be incorporated into an appropriate Construction Environmental Management Plan (CEMP).

It is noted that Ordinary Watercourse Consents may be required at subsequent stages.

Any proposals, including watercourse crossings, should consider appropriate easements and ensure existing flow regimes and hydraulic capacity of watercourses are not impacted.

At this stage, the Council raises no objection in principle to the proposed development. However, this is subject to the submission and approval of detailed design information, alongside robust and policy compliant flood risk and drainage strategies at subsequent stages.

HBC Heritage and Open Spaces

From the information provided at this stage it is considered that the proposal is unlikely to impact on any listed or buildings or conservation areas. Further detailed information would be required to understand the potential impact on locally listed buildings that are potentially within the vicinity of the application site.

HBC Traffic and Transport

There are no Highway objections to this proposal.

HBC Building Control

I can confirm that we do not require a Building Regulation application for Adjoining Authority Consultation for a scoping opinion for the East Coast Hydrogen Teesside Pipeline.

HBC Land Use Policy

No comments to make.

Other Consultees

Comments were not received from the consultees listed below. You should not take the lack of comments from respective consultees as an indication of no objection or requirements, however should you wish to gain an understanding of the views of additional consultees, I have set out the relevant contact details for your consideration.

HBC Public Protection: environmental.protection@hartlepool.gov.uk

HBC Engineering Consultancy: [REDACTED]@hartlepool.gov.uk

HBC Arboricultural Officer: [REDACTED]@hartlepool.gov.uk

If you would like any further information about the Council's decision please contact your case officer Stephanie Bell quoting the reference number given above.

Yours faithfully



Senior Planning Officer

Direct Dial: [REDACTED]

Our ref: PL00801784

PINS ref.: EN0710010

Date: 8 June 2026

By email

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

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

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

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

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

- EN0710010 – East Coast Hydrogen Teesside Pipeline Environmental Impact Assessment (EIA) Scoping Report (Volume I – Main Text)
- EN0710010 – East Coast Hydrogen Teesside 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 the Northeast of England. 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 6.2**, 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.

The scheduled monument of Preston-le-Skerne Deserted Village (NHLE 1002335), as well as the Grade II* listed buildings of The Ivy House (NHLE 1139244) and Stockton and Darlington Railway Station and Worker's Housing (NHLE 1322808) are situated on the draft order limit boundary and need particular consideration in regard to avoiding an impact on the significance of the monuments.

For the assessment of baseline conditions in **Chapter 8.5.1** of the Scoping Report, we recommend to also use the available Historic England online resources for the National Mapping Project and Aerial Photographs Explorer.



Table B-4 provides information on the presence of hedgerows which could be classed as 'important hedgerows. As long as it is not clear if hedgerows and trees have to be removed during the construction phase and if these would be reinstated in a like-for-like manner, it cannot be established if the impact on the historic environment is non-permanent. The impact on the significance of designated heritage through the

permanent change of setting needs to be scoped in for the 'Temporary and permanent impacts through change to the setting of designated heritage assets' in **Chapter 8.5.1** of the Scoping Report, as long as the assessments have not established the impact otherwise.

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 8.13** of the Scoping Report provides a wide range of 'Socio-economics'. However, while the designated heritage assets have been identified as sensitivity receptors, it is not considered to include the historic environment for public benefit as one outcome of this proposed development. Past projects have shown that 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


Inspector of Ancient Monuments
E-mail: @historicengland.org.uk

From: Loftus Town Council <office@loftustowncouncil.gov.uk>
Sent: 25 June 2026 08:41
To: East Coast Hydrogen Pipeline – Teesside
<eastcoasthydrogenteesside@planninginspectorate.gov.uk>
Subject: East Coast Hydrogen Teesside Pipeline proposed development Scoping consultation

Good Morning,
Loftus Town Council Planning Committee met yesterday and discussed the consultation, one of the Councillors also attended the online discussion session and feedback to the committee.

Members understand the necessity of the development and look forward to seeing more detailed plans in the future and having the opportunity to comment.

Kind regards



Loftus Town Council
Town Hall
Loftus
TS13 4HG



Office Hours Monday - Friday 9am-3pm



**Loftus
Town Council**



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PINS reference: EN0710010

Environmental Services
Infrastructure Decisions and Applications Service
Planning Inspectorate
c/o QUADIENT
69 Buckingham Avenue
Slough
SL1 4PN
eastcoasthydrogenteesside@planninginspectorate.gov.uk

By email only

24 June 2026

Dear Sir/Madam,

RE: EN0710010 – East Coast Hydrogen Project- EIA Scoping Consultation and Notification

This letter is in response to the scoping opinion consultation request for the proposed Humber Hydrogen Pipeline, received by the Marine Management Organisation (MMO) on 29 May 2026.

After reviewing the submitted information, together with an enquiry made to the MMO by the applicant on 18 June 2026 (REF: ENQ/2026/00100), the MMO has concluded that depending on the methodology used to construct the pipelines (trenchless or open trench) the proposed project may fall within the scope of Section 35 (Bored Tunnels) of the Marine Licensing (Exempted Activities) Order 2011. As such, it may not fall within the MMO's regulatory jurisdiction. However, it remains the responsibility of the applicant to satisfy themselves that the proposed activities meet the criteria for this exemption. Our opinion may change as the developer confirms the methodology and refines the project parameters.

The developer has noted that any Unidentified Explosive Objects (UXOs) will be identified and cleared. The MMO considers that this will need separate licenses to survey and clear any UXOs under section 66 of the Marine and Coastal Access Act 2009. We advise that the developer engages with the MMO so we can clarify over any uncertainties when submitting a Marine license for these activities.

Following this EIA Scoping response, the MMO is awaiting further engagement with the applicant to discuss the project fully and therefore may provide additional information on the






scoping outside of the scoping consultation period to the Planning Inspectorate and the developer.

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

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

Yours Sincerely,




Marine Licensing Case Manager
D 
E @marinemanagement.org.uk



From: [REDACTED]@middlesbrough.gov.uk>

Sent: 10 June 2026 08:13

To: East Coast Hydrogen Pipeline – Teesside

<eastcoasthydrogenteesside@planninginspectorate.gov.uk>

Subject: RE: EN0710010 - East Coast Hydrogen Teesside Pipeline - EIA Scoping and Consultation and Regulation 11 Notification

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

This document was classified as: OFFICIAL

Good morning [REDACTED]

Thank you for your email of 29th May consulting on the proposed hydrogen pipeline on Teesside.

Middlesbrough Council has no specific comments to make at this time.

Regards

[REDACTED]
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





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: [REDACTED] - **Senior Environmental Advisor**
Planning Inspectorate

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

Our ref: ENSIP-54

16th June 2026

Dear [REDACTED]

Re: East Coast Hydrogen Teesside Pipeline – Scoping Consultation

Thank you for your notification of the 29th 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 Coal Authority are a statutory consultee under Schedule 1 of The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009, where projects fall within areas of past, present or future coal mining.

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

I can confirm that based on the area of the route proposed the project does lie within the defined coalfield. On this basis we have no comments to make on this Scoping Consultation.

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

Yours sincerely

[REDACTED]

[REDACTED]

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.



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

Date: 25th 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 Teesside Pipeline (the Proposed Development)

I refer to your letter dated 29/05/2026 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 – FM07 – Bishop Auckland to Sutton Howgrave
- Feeder Main – FM13 – Bishop Auckland to Yafforth
- Feeder Main – FM06 – Little Burdon to Billingham ICI
- Feeder Main – FM13 – Cowpen Bewley to Bishop Auckland
- Feeder Main – FM06 – Cowpen Bewley to Teesside Terminal
- NGT Freehold – CE160343
- NGT Leasehold – CE185475
- NGT Leasehold – YE134288
- Cathodic Protection Groundbeds/TR
- Ancillary apparatus

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

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

General Pipeline Information

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

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

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

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

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

Any large installations which may result in a population increase in the vicinity of a high pressure gas pipeline must comply with the HSE's Land Use Planning (LUP) methodology, and the HSE response should be submitted to NGT for review. NGT will typically support the HSE's advice, however, the HSE's LUP methodology differs from IGEM risk assessment methodology and as such, the pipeline operating conditions / specifications and the formation of a population cluster and / or increased population density near the pipeline as a result of development, may provide sufficient reasons on safety grounds for NGT to request that the Promoter / Developer conducts a risk assessment in form of a Quantitative Risk Assessment (QRA). The QRA must be completed by a specialist company approved to carry out these assessments for NGT.

Pipelines and Buried Services

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

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

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

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

Yours faithfully,

██████████

DCO Liaison Officer

██████████
Lead Development Liaison Officer
██████████@nationalgrid.com
██████████

██████████
Development Liaison Support Officer
██████████@nationalgrid.com
██████████

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

SUBMITTED ELECTRONICALLY:
eastcoasthydrogenteeside@planninginspectorate.gov.uk

25 June 2026

Dear Sir/Madam

RE: APPLICATION BY Northern Gas Networks (THE APPLICANT) FOR AN ORDER GRANTING DEVELOPMENT CONSENT FOR THE East Coast Hydrogen Teesside Pipeline (THE PROPOSED DEVELOPMENT)

SCOPING CONSULTATION RESPONSE

We refer to your letter dated 25th June 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

- Norton 400KV Substation
- Norton 275KV Substation
- Norton 132KV Substation
- Saltholme 275KV Substation
- Saltholme 132KV Substation
- Hartlepool 275KV Substation
- Tod Point 275KV Substation
- Grangetown 66KV Substation
- Grangetown 275KV Substation
- Wilton 275KV Substation

- Greystones 66KV Substation
- Greystones B 275KV Substation
- Greystones A 275KV Substation

Associated overhead and underground apparatus including cables

Overhead Lines

4TF ROUTE 275kV	NORTON - SPENNYMOOR 1 NORTON - SPENNYMOOR 2
ZXC ROUTE 275kV	HAWTHORN PIT - NORTON 275KV HAWTHORN PIT - NORTON 400KV
YYJ/N ROUTE 400kV	LACKENBY - NORTON 400KV 1 NORTON - SALTHOLME
4TH ROUTE 275kV	HARTLEPOOL - SALTHOLME HARTLEPOOL - TOD POINT
4TG ROUTE 275kV	HARTLEPOOL - WEST BOLDON HARTLEPOOL - HARTMOOR
ZZA ROUTE 400kV	HARTMOOR - HARTLEPOOL 4 HAWTHORN PIT - OFFERTON
YYQ ROUTE 275kV	HARTLEPOOL - TOD POINT LACKENBY - TOD POINT
ZZA ROUTE 400kV	LACKENBY - NORTON 400KV 1 LACKENBY - TOD POINT

Underground Cable

GRANGETOWN - LACKENBY 1 CABLE SECTION 05
 GRANGETOWN - LACKENBY 1
 GRANGETOWN - LACKENBY 2 CABLE SECTION 05
 GRANGETOWN - LACKENBY 2

Cable fibres

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

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

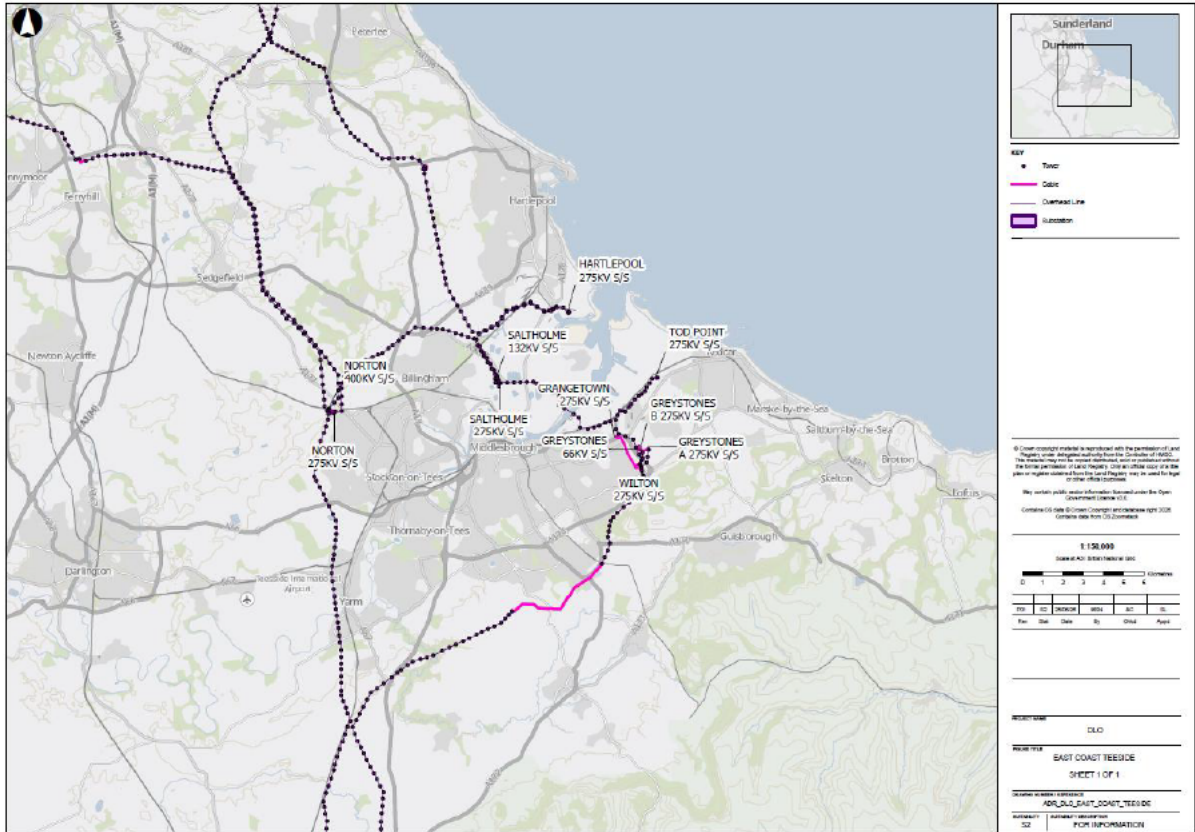


Figure 1: NGET Assets in proposed development area

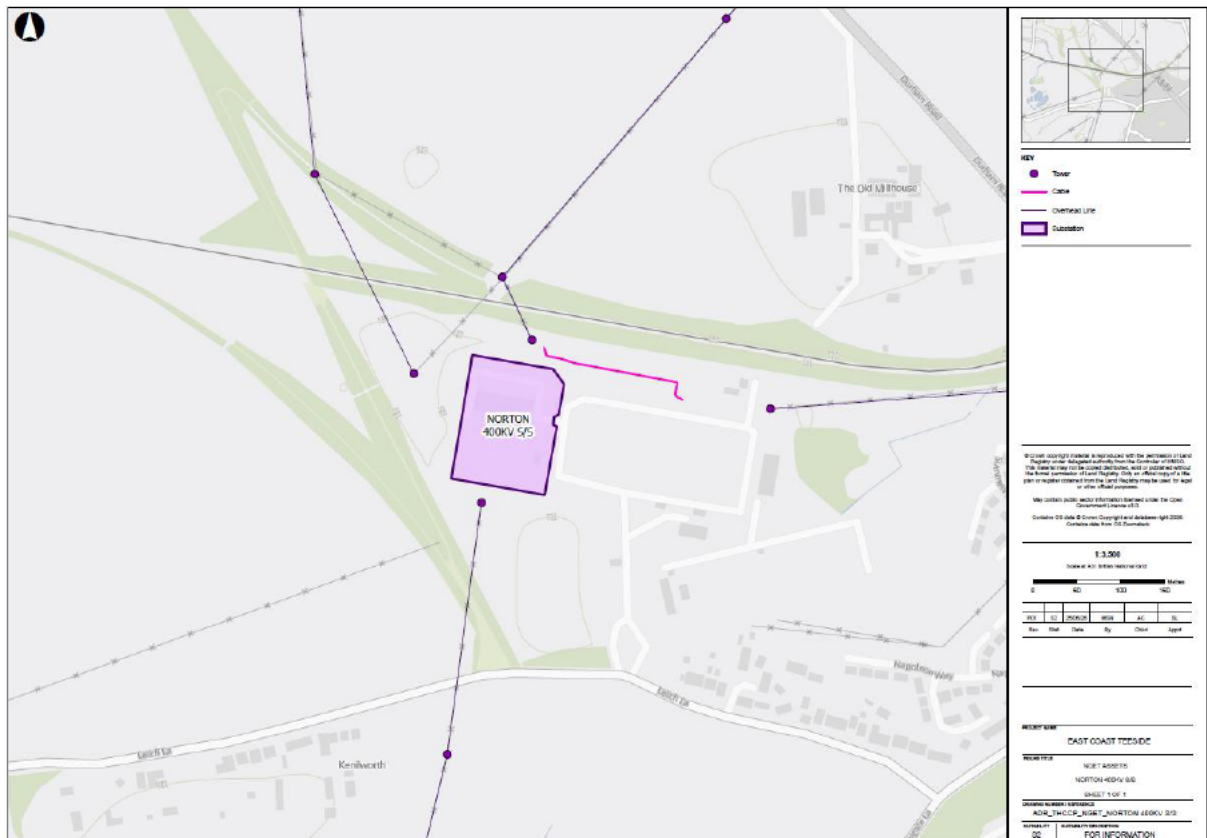


Figure 2: NGET's NORTON 400KV Substation

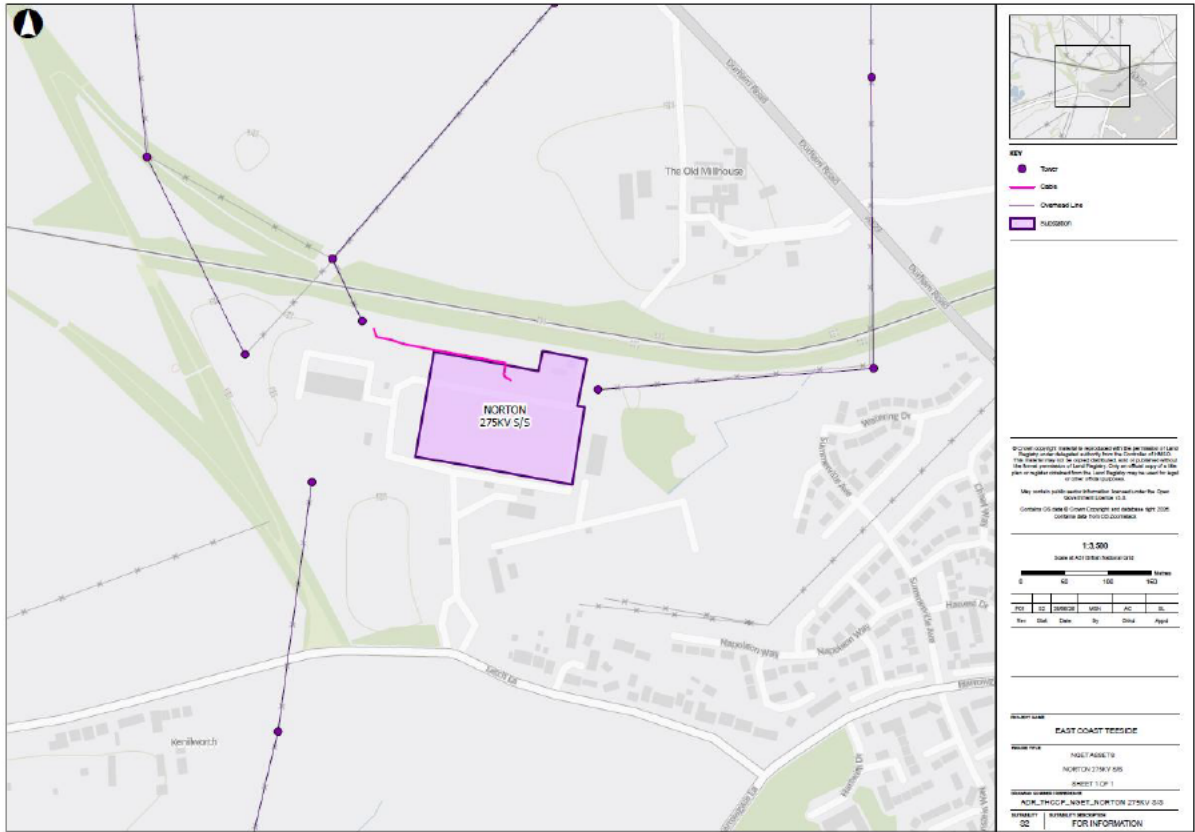


Figure 3: NGET's NORTON 275KV Substation

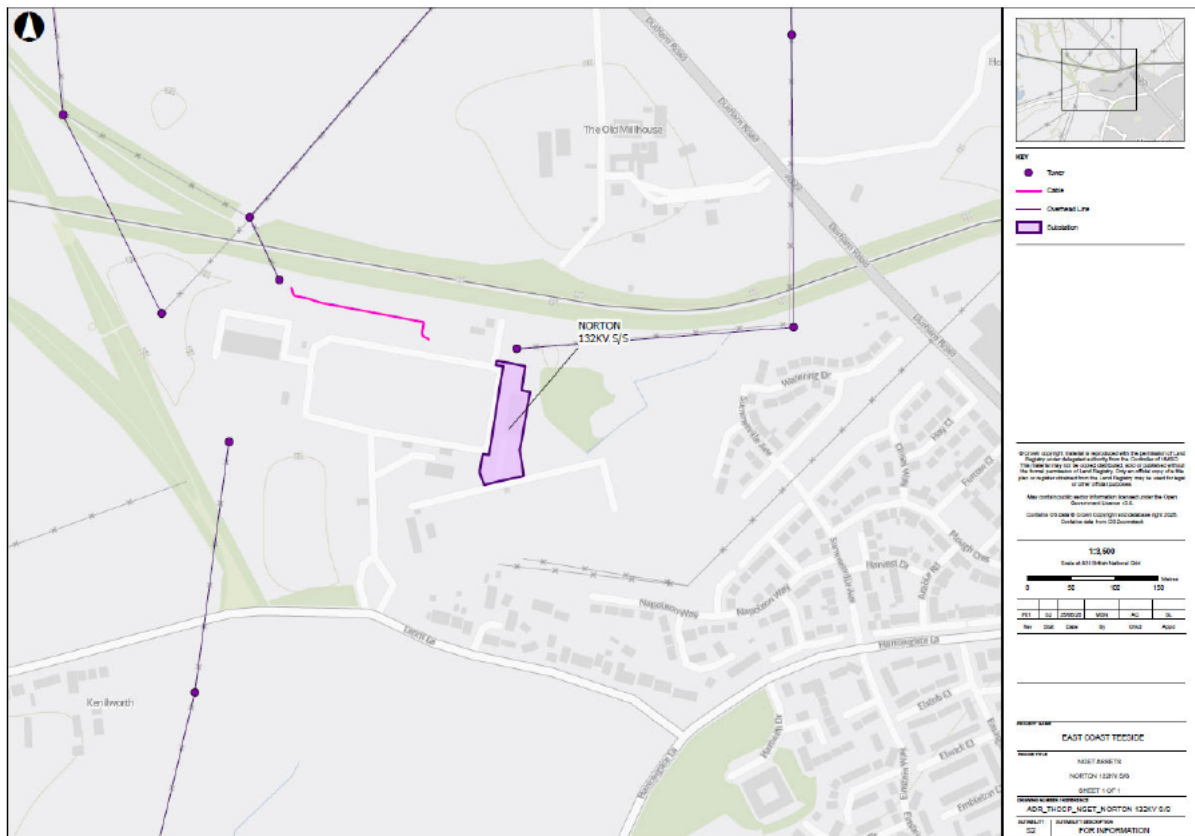


Figure 4: NGET's NORTON 132KV Substation

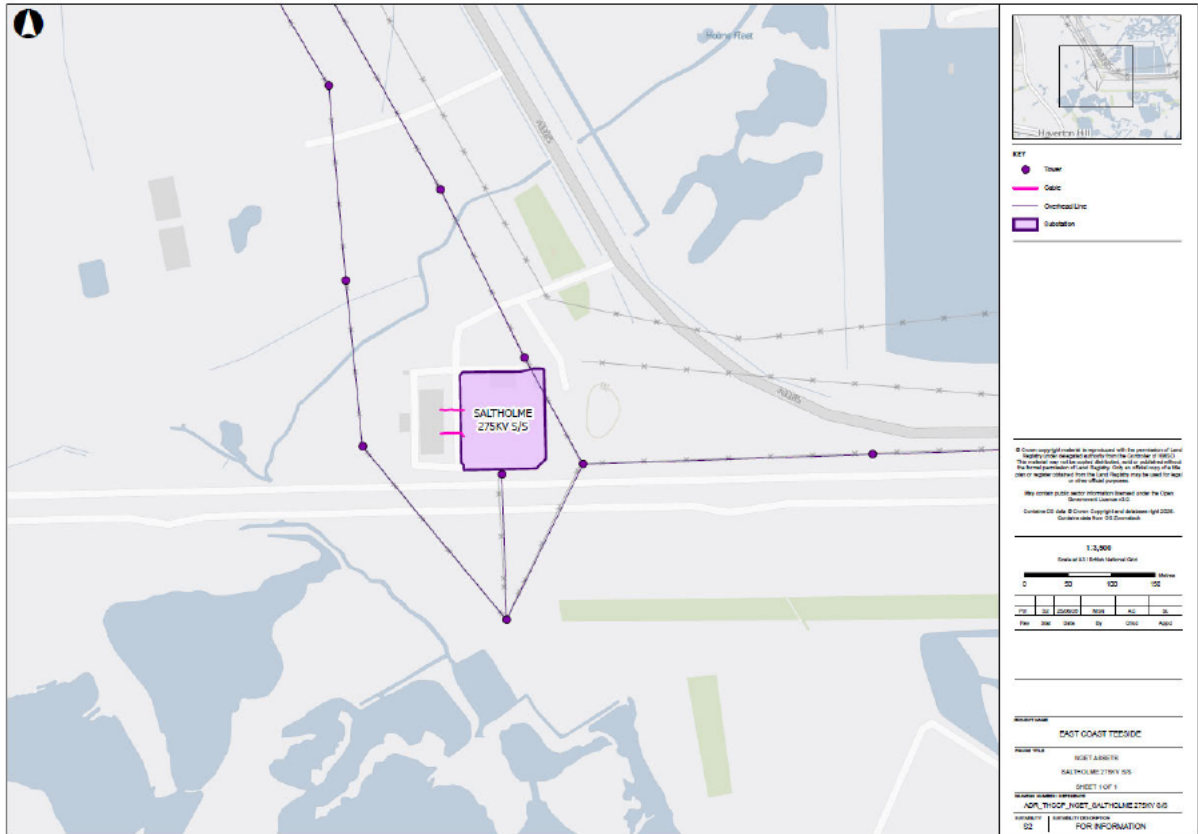


Figure 5: NGET's SALTHOLME 275KV Substation

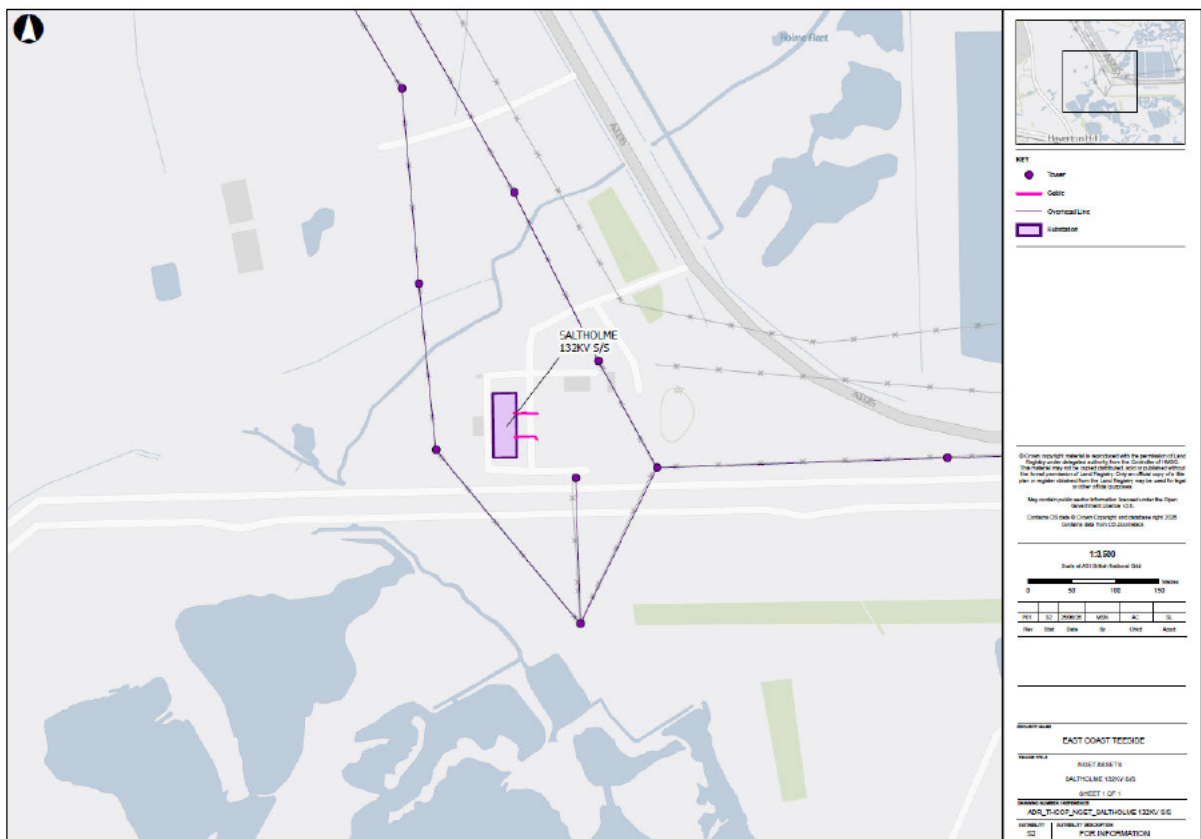


Figure 6: NGET's SALTHOLME 132KV Substation

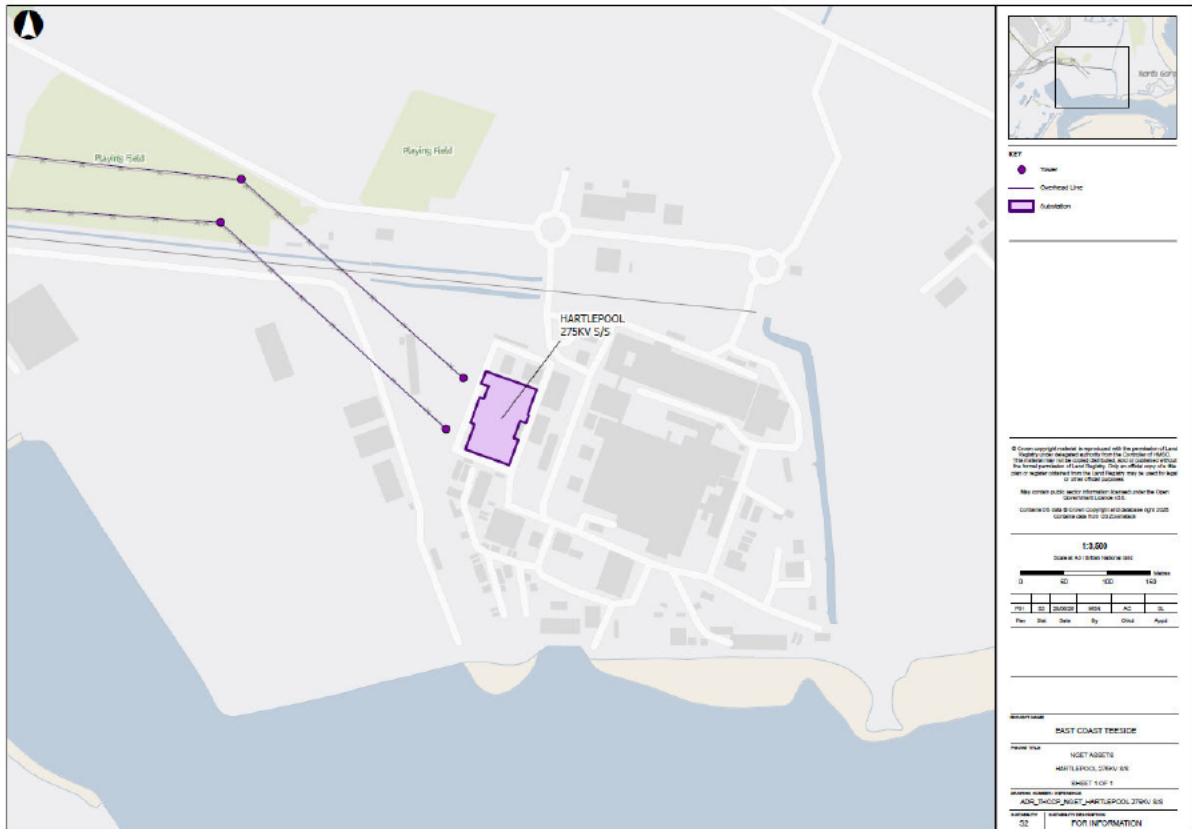


Figure 7: NGET's HARTLEPOOL 275KV Substation

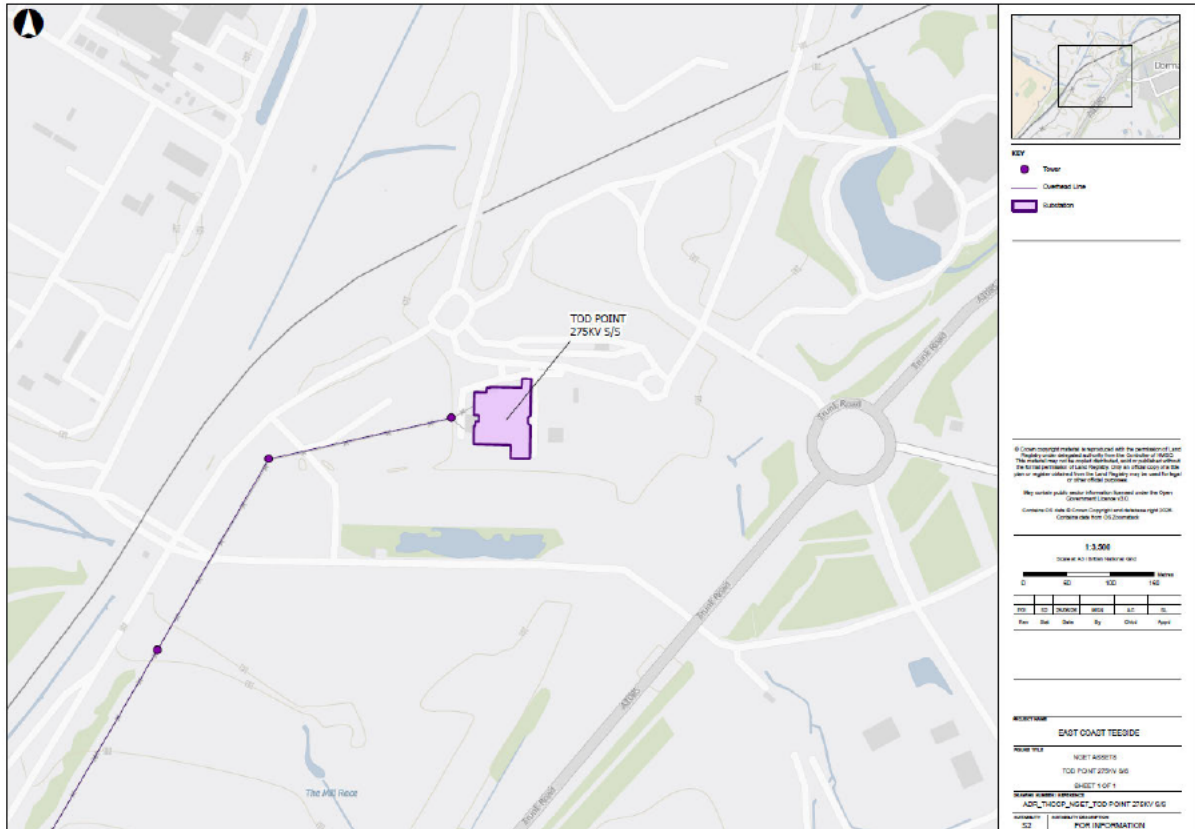


Figure 8: NGET's TOD POINT 275KV Substation

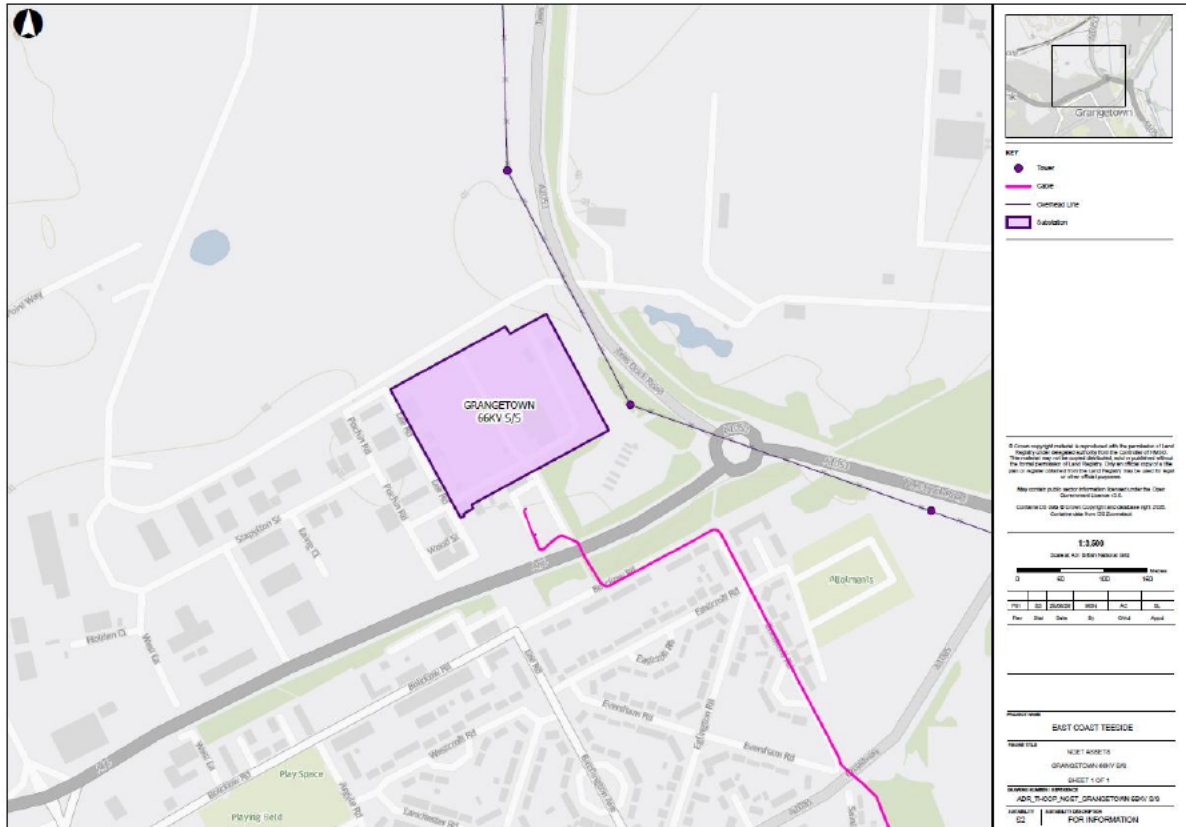


Figure 9: NGET's GRANGETOWN 66KV Substation

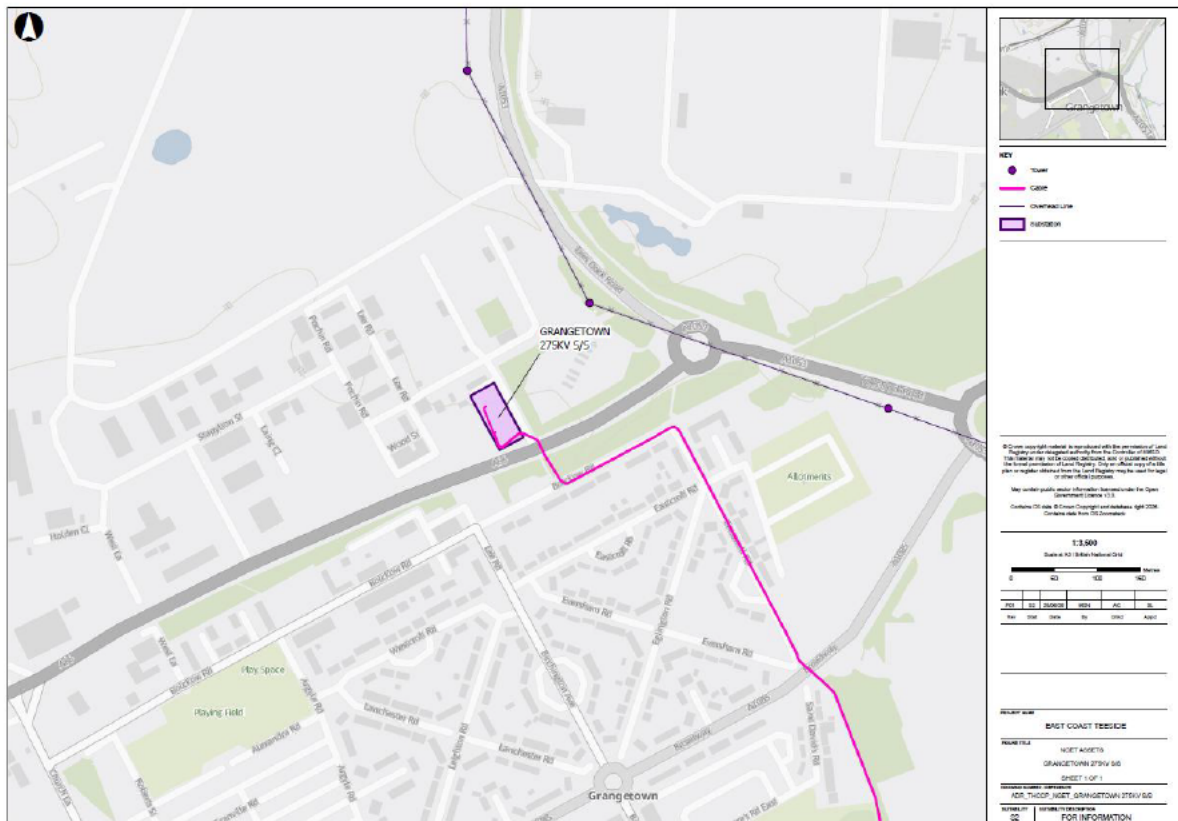


Figure 10: NGET's GRANGETOWN 275KV Substation

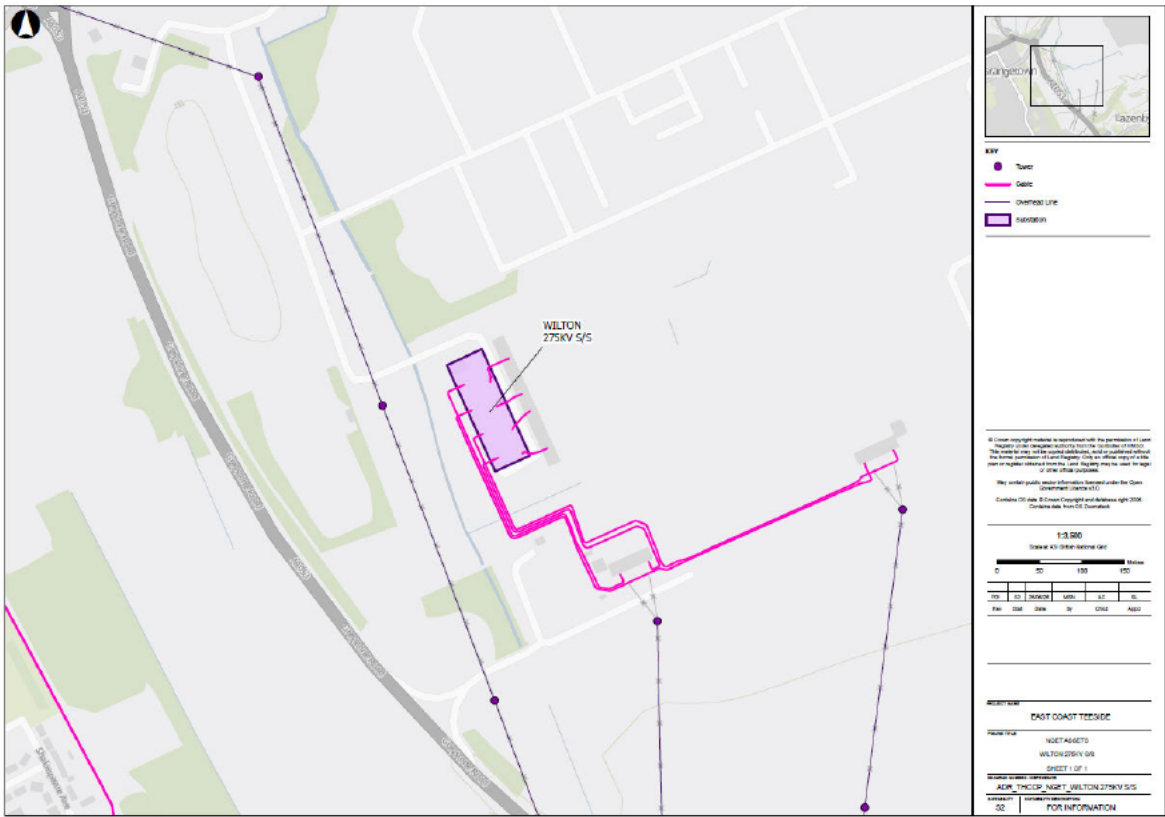


Figure 11: NGET's WILTON 275KV Substation

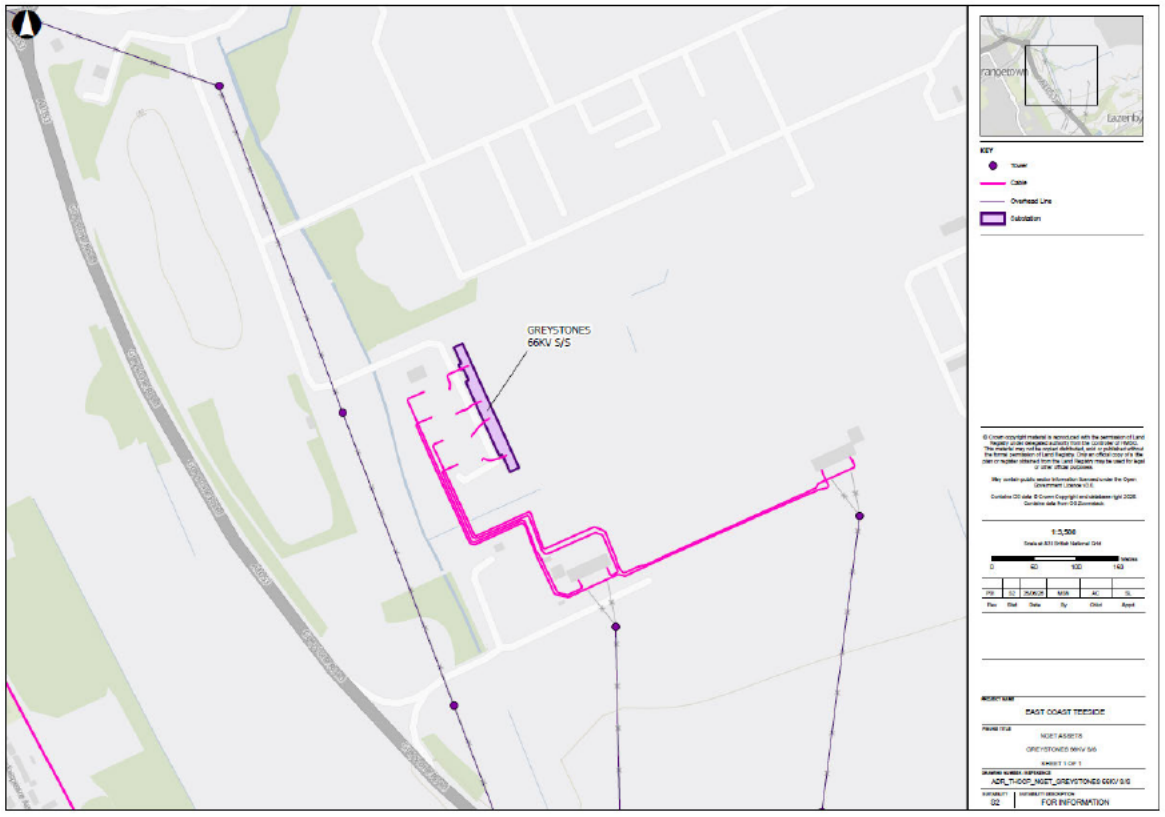


Figure 12: NGET's GREYSTONES 66KV Substation

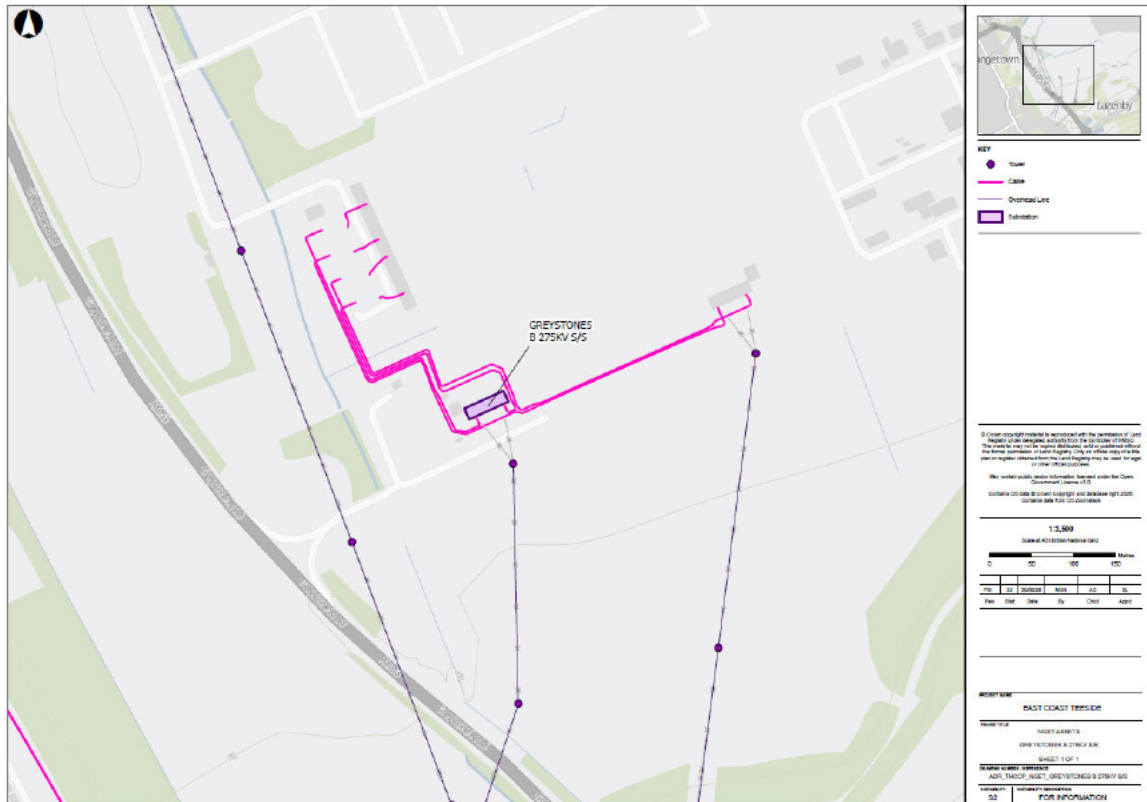


Figure 13: NGET's GREYSTONES B 275KV Substation

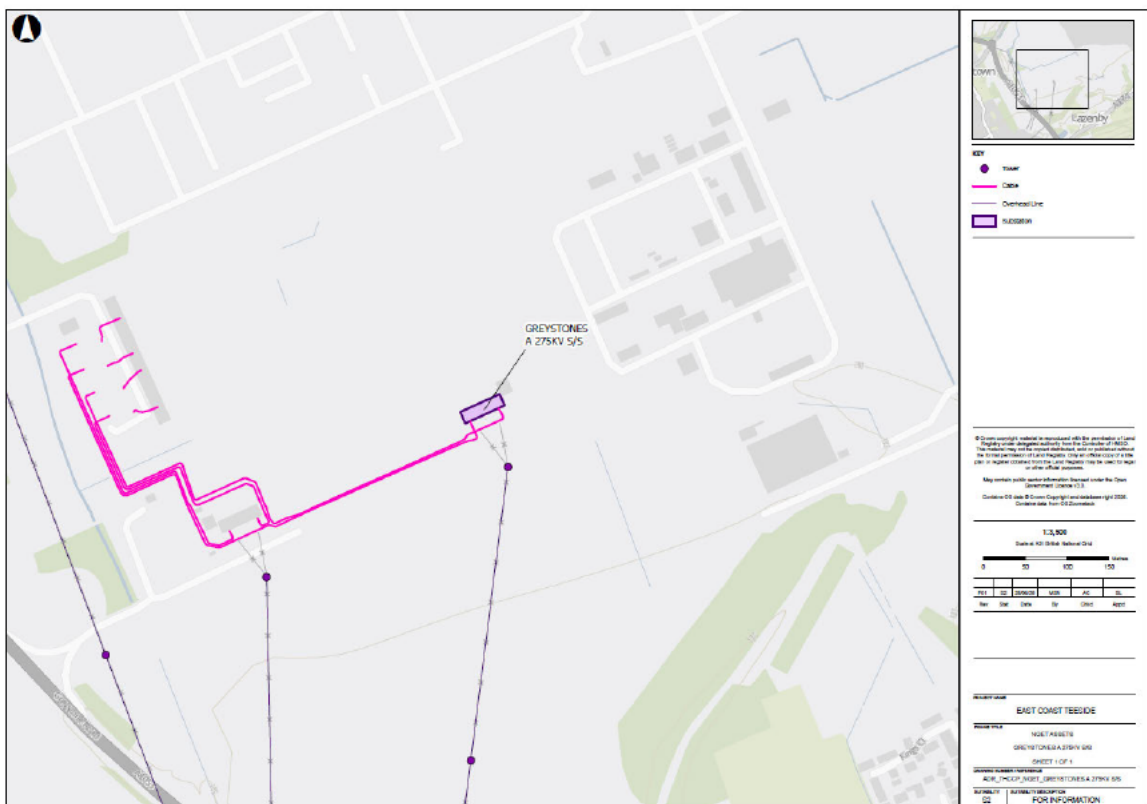


Figure 14: NGET's GREYSTONES A 275KV Substation

New infrastructure

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

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

Onshore Infrastructure

Tod Point

The Tod Point project comprises the extension of the existing 275kV Tod Point substation to accommodate customer connections. The project was consented in 2026 (R/2024/0565/FFM) and the construction of this project is due to commence in 2026/2027.

Tees Dock New Substation

NGET are developing a new substation project in the Teesworks area. It will comprise of the construction of a new 400kV substation and ancillary development, including alterations to overhead line infrastructure, to facilitate customer connections. A planning submission is targeted by the end of 2026

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

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

The Great Grid Upgrade is the largest overhaul of the electricity grid in generations, we are in the middle of a transformation, with the energy we use increasingly coming from cleaner greener sources. Our infrastructure projects across England and Wales are helping to connect more renewable energy to homes and businesses. To find out more about our current projects please refer to our network and infrastructure webpage. <https://www.nationalgrid.com/electricity-transmission/network-and-infrastructure/infrastructure-projects>. Where it has been identified that your project interacts with or is in close proximity to one of NGET's infrastructure projects, we would welcome further discussion at the earliest opportunity.

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

The following points should be taken into consideration.

Specific Comments – Electricity Infrastructure:

- NGET's Overhead Line/s is protected by a Deed of Easement/Wayleave Agreement which provides full right of access to retain, maintain, repair and inspect our asset
- Statutory electrical safety clearances must be maintained at all times. Any proposed buildings must not be closer than 5.3m to the lowest conductor. NGET recommends that no permanent structures are built directly beneath overhead lines. These distances are set out in EN 43 – 8 Technical Specification for "overhead line clearances Issue 5 (2019)".

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

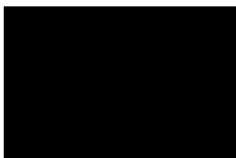
Further Advice

NGET requests to be consulted at the earliest stages to ensure that the most appropriate protective provisions are included within the DCO application to safeguard the integrity of our apparatus and to remove the requirement for objection. All consultations should be sent to the following email address: box.landandacquisitions@nationalgrid.com

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

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

Yours faithfully,



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



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

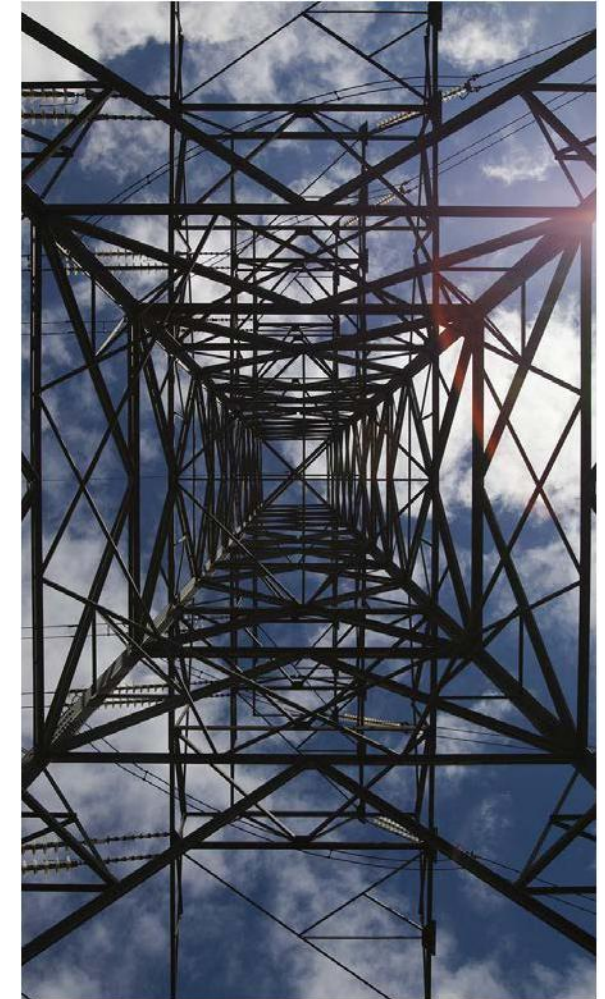
Technical Guidance Note 287

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





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Disclaimer

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



Purpose and scope

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

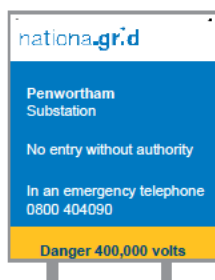
The scope of the report covers information on basic safety and the location of our assets – and also highlights key issues around particular types of development and risk areas.

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

How to identify specific National Grid sites

Substations

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



Overhead Lines

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



Contact National Grid

Plant protection

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

www.lsbud.co.uk

Email: assetprotection@nationalgrid.com

Phone: 0800 001 4282

Emergencies

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

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

Consider safety

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



Part 1

Electricity transmission infrastructure

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

Overhead lines

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

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

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

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

Underground cables

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

Substations

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

Part 2

Statutory requirements for working near high-voltage electricity

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

Electrical safety clearances

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

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

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

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



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Your Responsibilities - Overhead lines

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

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

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

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

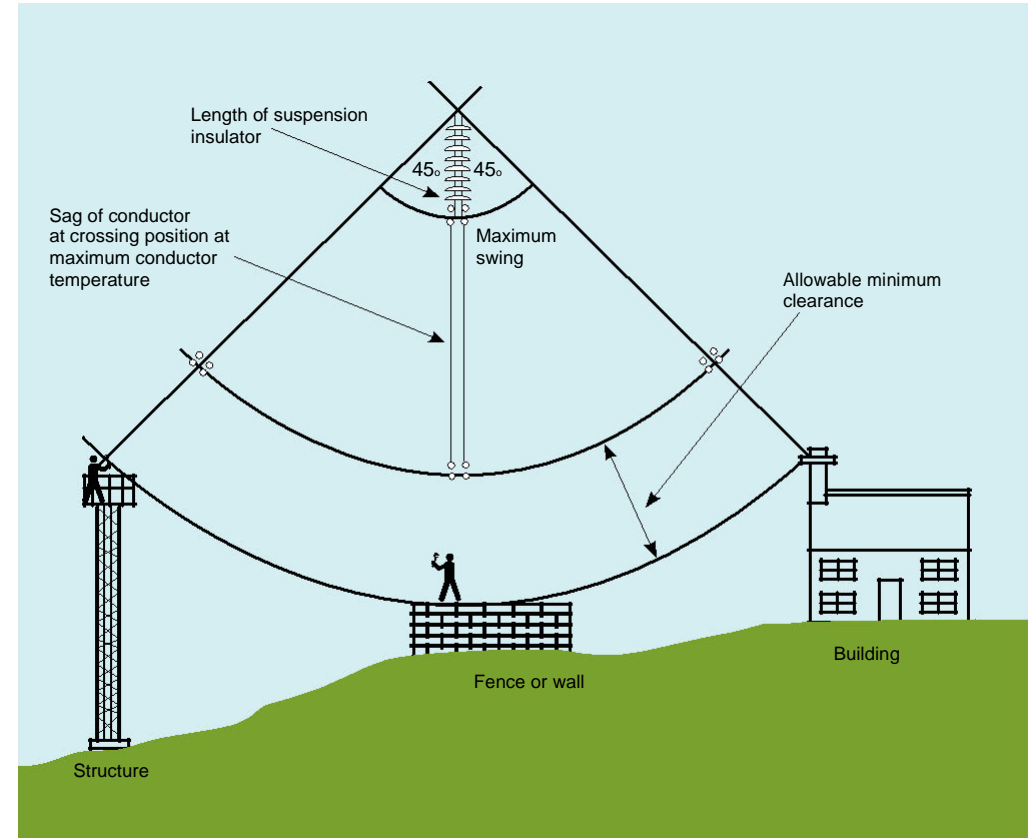
The clearance distances referred to in this section are specific to 400kV overhead lines. National Grid can advise on the distances required around different voltages i.e. 132kV and 275kV.

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

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

Impressed voltage

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

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

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Earth potential rise

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

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

Noise

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

Maintenance access

National Grid needs to have safe access for vehicles around its assets and work that restricts this will not be allowed.

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

30m

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

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Fires and firefighting

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

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

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

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

Excavations, piling or tunnelling

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

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

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

Microshocks

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

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

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



200m

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



Specific development guidance

Wind farms

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

There are two main criteria in the document:

(i) The turbine shall be far enough away to avoid the possibility of toppling onto the overhead line

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

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

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

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

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

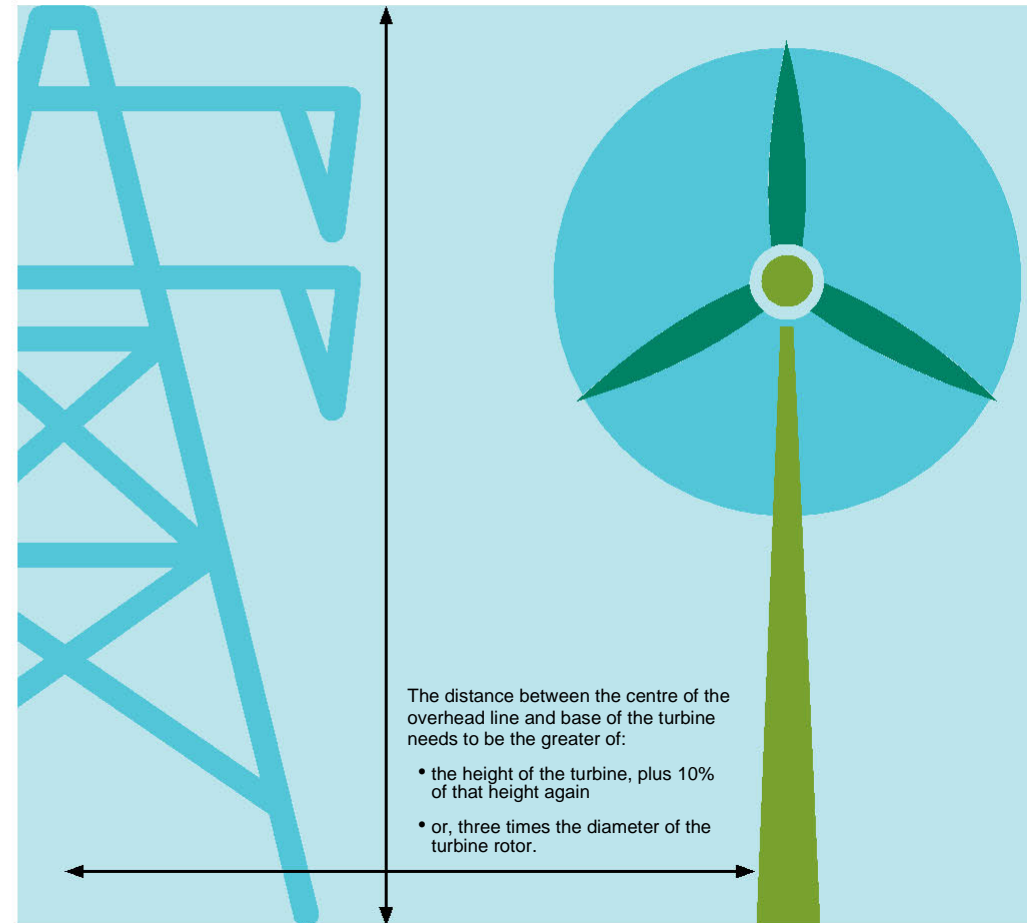
Commercial and housing developments

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

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

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Diagram not to scale



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



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

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

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

Solar farms

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

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

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

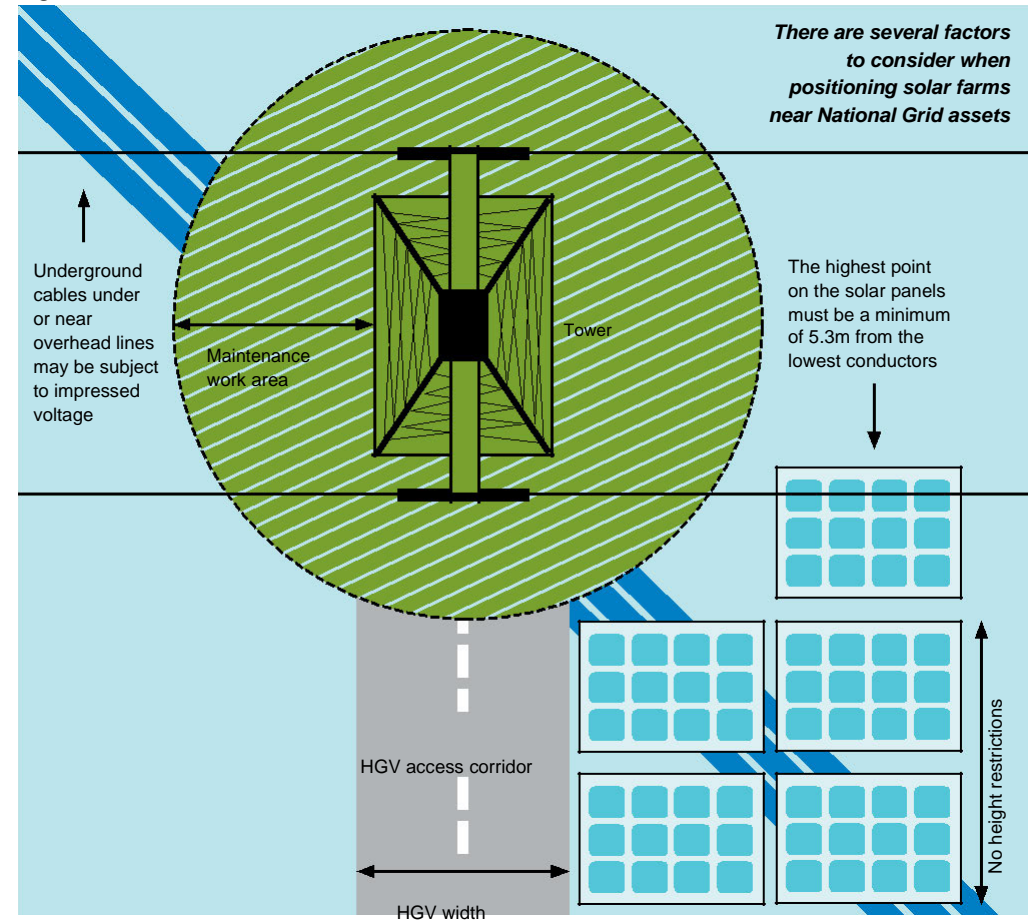
Solar panels that are directly underneath power lines risk being damaged on the rare occasion that a conductor or fitting falls to the ground. A more likely risk is ice falling from conductors or towers in winter and damaging solar panels.

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

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

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

Diagram not to scale



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



Asset protection agreements

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

Contact details

Emergency situations

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

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

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

Routine enquiries

Email:
assetprotection@nationalgrid.com

Call Asset Protection on:
0800 0014282

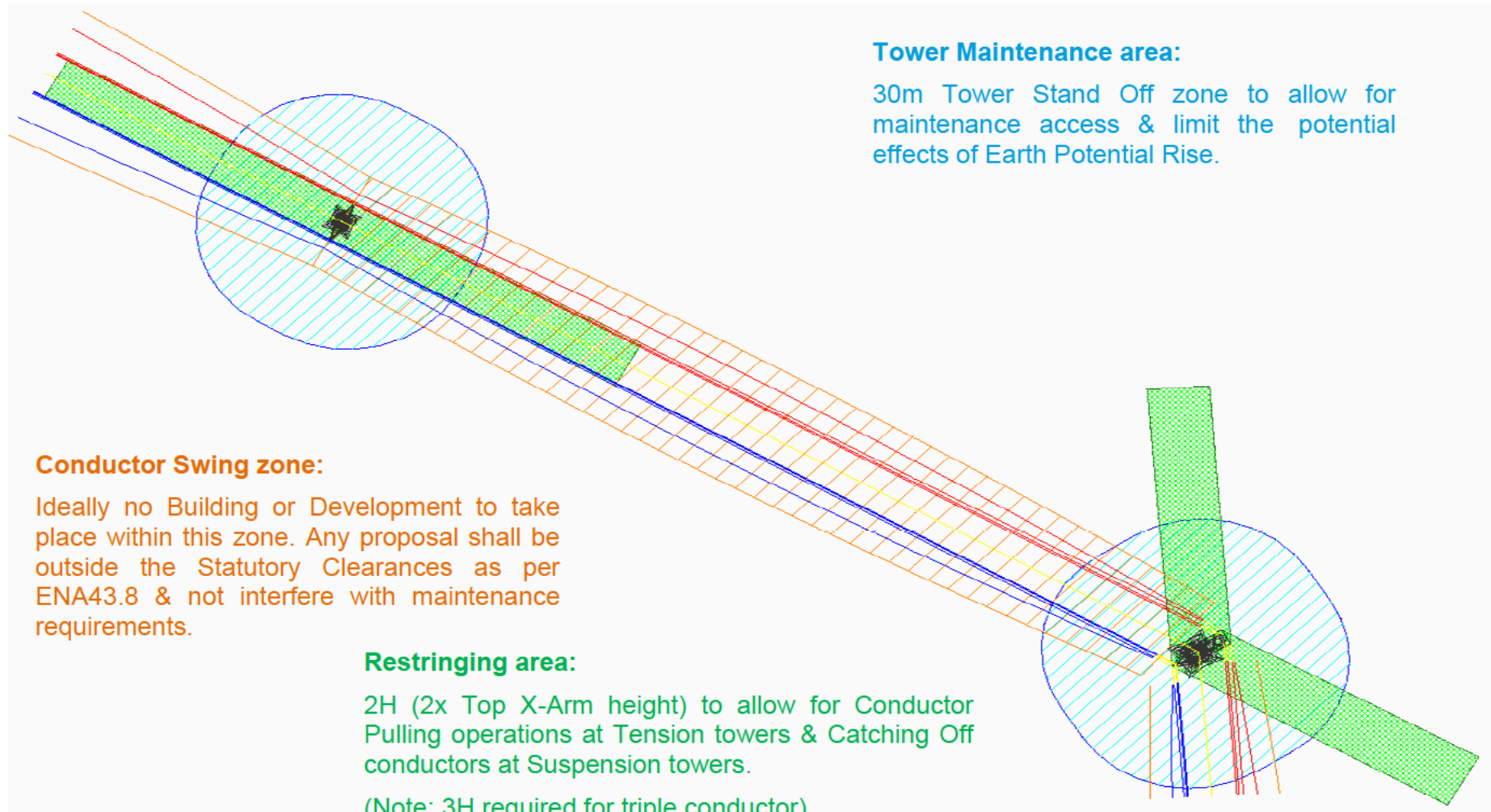
Opening hours:
Monday to Friday 08:00-16:00

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OHL Tower Stand Off & Reconducting Area



- 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 28th May 2026, runs to 16th 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 Teesside region to a range of industrial consumers across Teesside and County Durham, including potential connection(s) to other third-party hydrogen networks.

As currently proposed, the Proposed Development comprises the construction and operation of approximately 63km of new and potentially repurposed underground high (HP) (>7bar) and intermediate (IP) (2>7bar) pressure hydrogen pipelines between Skinningrove and Newton Aycliffe.

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 5) 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 Redcar and Cleveland Borough Council (RCBC), Stockton Borough Council (SBC), Hartlepool Borough Council (HBC), Durham County Council (DCC) and Darlington Borough Council (DBC). It also currently crosses the A1(M), A19 and the A1053 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 is 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 early (Q1) 2028 with predicted commencement of construction in Q2 2030 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 (*Populus 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 (*Populus alba*, *Populus hybrid*, *Populus lombardii*)
12. English Oak (*Quercus robur*).

Furthermore, as the applicant will need to be aware, the planting of ash (*Fraxinus excelsior*) and larch (*Larix* sp) 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 Teesside 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.

Decommissioning Phase

As set out above, the Teesside 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.

legalservices@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,

██████████ sent on behalf of

██████████
██████████

██████████

Planning and Development

██████████ [@nationalhighways.co.uk](mailto:██████████@nationalhighways.co.uk)

Date: 25 June 2026
Our ref: 546496
Your ref: EN0710010



██████████@eastcoasthydrogenteesside@planninginspectorate.gov.uk

BY EMAIL ONLY

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

T 0300 060 900

Dear ██████████

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

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

Location: A linear route from hydrogen producers in Teesside east to Skinningrove (Redcar and Cleveland Borough Council) and west to Newton Aycliffe (Durham County Council) via Cowpen Bewley, with spurs to off takers branching off the main route of the pipeline including north towards Hartlepool (Hartlepool Borough Council).

Thank you for seeking our advice on the scope of the Environmental Statement (ES) in the consultation dated 29 May 2026, received on the same date

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).

The following annexes to this letter provide Natural England's advice on the scope of the Environmental Impact Assessment (EIA) for the proposed development:

- Annex A – Natural England's Advice on EIA Scoping
- Annex B – Natural England's detailed comments on the Scoping Report
- Annex C – Standard Advice for Air Quality Impacts in National Significant Infrastructure Projects (NSIPs)

Summary of key concerns

A summary of Natural England's most urgent concerns regarding the scope of the assessment for the Proposed Development is set out below:

Soils and Agricultural Land

Natural England advises that an ALC and soil survey of the land should be undertaken across the full Order Limits for Proposed Development (where detailed existing ALC information is not available). It is Natural England's view that the hybrid approach proposed will not provide enough detail to inform the EIA.

Teesmouth and Cleveland Coast Site of Special Scientific Interest (SSSI), Special Protection Area (SPA), and Ramsar Site

Natural England can confirm that the ornithological interest of the Teesmouth and Cleveland Coast SSSI, SPA, and Ramsar site persists on a year-round basis. Therefore, we advise that ecological survey methodologies must fully reflect seasonal site use and appropriately assess potential zones of influence - specifically regarding noise and visual disturbance - extending beyond the defined Order Limits

Ancient Woodland

The Scoping Report has correctly identified Ancient Woodland as an irreplaceable habitat, while stating that 10 individual parcels of Ancient Woodland are within the scoping boundary and a further 99 parcels are within 500m of the boundary. The ES needs to clearly state where the project will interact with Ancient Woodland and how it plans to minimise its impacts. Natural England requires further information about the projects ability to minimise its impacts through its routing options and ability to go under woodland parcels.

The ES also needs to fully assess all impacts to all classifications of Ancient Woodland equally. The assessment should consider both direct impacts (e.g. land-take, habitat loss, trenching) and indirect impacts (e.g. hydrological changes, soil disturbance, fragmentation, edge effects, air pollution, and disturbance during construction and operation). Where impacts cannot be avoided, the ES should set out robust mitigation measures, including trenchless techniques beneath woodland, appropriate stand-off distances, and long-term management strategies to protect the integrity of these irreplaceable habitats.

Natural England draws your attention to Paragraph 5.4.55 of The Overarching National Policy Statement for Energy (EN-1) which states that the Secretary of State should not grant development consent that would result in the loss or deterioration of irreplaceable habitats, including ancient woodland and ancient and veteran trees unless there are wholly exceptional reasons and a suitable compensation strategy exists.

Operational, Maintenance and Decommissioning activities

Natural England disagrees that effects for these phases on designated sites can be scoped out at this stage as the details of the activities proposed provided in Section 4.10 (Operation and maintenance activities) and Section 4.11 (Decommissioning) are limited. Natural England advise that all activities are scoped in to the assessment until further detail is provided to be able to scope out or mitigate any potential impacts.

Landscape Visual Impact Assessment Pipeline Study Area

Natural England advises that a 2km Study area of the pipeline should be applied at this stage. Natural England would expect any national landscape designated within 2km of the Order Limit boundary to be assessed.

NGN is in the process of entering into a Discretionary Advice Service agreement with Natural England. We welcome this engagement and NGN to use this service during the pre-application phase for advice on how to address the key concerns raised in this letter.

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

Yours sincerely

██████████

Northumbria Area Team

Annex A – Natural England’s Advice on EIA Scoping

1. General principles

- 1.1. Regulation 11 of the Infrastructure Planning Regulations 2017 - (The EIA Regulations) sets out the information that should be included in an ES to assess impacts on the natural environment. This includes:
- A description of the development – including physical characteristics and the full land use requirements of the site during construction and operational phases
 - Appropriately scaled and referenced plans which clearly show the information and features associated with the development
 - An assessment of alternatives and clear reasoning as to why the preferred option has been chosen
 - A description of the aspects and matters requested to be scoped out of further assessment with adequate justification provided¹.
 - Expected residues and emissions (water, air and soil pollution, noise, vibration, light, heat, radiation etc.) resulting from the operation of the proposed development
 - A description of the aspects of the environment likely to be significantly affected by the development including biodiversity (for example fauna and flora), land, including land take, soil, water, air, climate (for example greenhouse gas emissions, impacts relevant to adaptation), cultural heritage and landscape and the interrelationship between the above factors
 - A description of the likely significant effects of the development on the environment – this should cover direct effects but also any indirect, secondary, cumulative, short, medium, and long term, permanent and temporary, positive, and negative effects. Effects should relate to the existence of the development, the use of natural resources (in particular land, soil, water and biodiversity) and the emissions from pollutants. This should also include a description of the forecasting methods to predict the likely effects on the environment
 - A description of the measures envisaged to prevent, reduce and where possible offset any significant adverse effects on the environment
 - An outline of the structure of the proposed ES
- 1.2. From the Scoping Report provided, Natural England consider that these general principles **will** be appropriately addressed through the EIA process.

2. Cumulative and in-combination effects

- 2.1. 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

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)

completion of the development and for which sufficient information is available to assess the likelihood of cumulative and in-combination effects.

Construction Phase

- 2.2. Due to the number of developments recently approved or under consideration within the wider Teesside industrial cluster, Natural England has identified that scope exists for the construction phases of multiple schemes to occur. Residual impacts (impacts remaining after mitigation measures are applied) from different schemes may accumulate to result in an adverse effect on SPA qualifying features or may hinder the site achieving its conservation objectives.
- 2.3. For example, the unmitigable disturbance arising from one scheme, when experienced by SPA birds subject to similar disturbance from a preceding or subsequent project may overlap and act to cause extended disturbance impacts to the species. To minimise the scope for such 'residual' impacts from e.g. noise and visual disturbance to SPA bird species, relevant mitigation measures for each scheme should aim to fully mitigate the project's effects (alone).
- 2.4. Table 1 lists development projects Natural England is aware of that should be considered for in-combination effects.

Table 1: Plans or projects that Natural England is aware of that might need to be considered in the ES	
Project/Plan	Status
Tees Combined Cycle Power Plant – EN010082	Decided
Net Zero Teesside – EN010103	Decided
Dogger Bank Teesside A / Sofia Offshore Wind Farm - EN010051	Decided
H2NorthEast (H2NE) – EN0710005	Pre-Application
Lighthouse Green Fuels - EN0110025	Pre-Application
Construction and operation of a mineral processing and refining facility, including ancillary development, car parking and landscaping - R/2017/0876/FFM	Approved
Grangetown Prairie Energy Recovery Facility and associated development - R/2019/0767/OOM	Outline approval
Plastic conversion facility at former Croda Site, Wilton (Redcar) - R/2019/0031/FFM	Approved
York Potash Polyhalite Mine - R/2014/0627/FFM	Approved
Residential development of 1250 homes - R/2014/0372/OOM	Outline approval
Decommissioning and construction of industrial work - R/2020/0357/OOM	Outline approval
Development of a container terminal - R/2006/0433/OOM	Outline approval
39,353 sqm (gross) of general industry (Use Class B2) and storage or distribution facilities (Use Class B8) with office accommodation (Use Class E), HGV and car parking, works to watercourse including realignment and associated infrastructure works. All matters reserved - R/2020/0819/ESM	Outline approval
Outline planning application for development of up to 92,903sqm (gross) of general industry (Use Class B2) and storage or distribution facilities (Use Class B8) with office accommodation (Use Class E), HGV and car parking and associated development – R/2020/0820/ESM	Outline approval
Outline planning application for development of up to 185,806sqm (gross) of general industry (Use Class B2) and storage or distribution facilities (Use Class B8) with office accommodation (Use Class E), HGV and car parking and associated development - R/2020/0822/ESM	Outline approval

Table 1: Plans or projects that Natural England is aware of that might need to be considered in the ES	
Project/Plan	Status
Development of new quay - R/2020/0685/ESM	Approved
Lithium Hydroxide Monohydrate manufacturing plant - R/2022/0773/ESM	Approved
Mineral granulation and storage facility - R/2023/0291/ESM	Approved
Hygreen Hydrogen project Scoping opinion - R/2023/0179/SCP	Scoping opinion
Tees Valley Joint Minerals and Waste Development - MWP8 South Tees Eco Park	Development Plan
1200 dwellings with associated parking, landscaping and infrastructure with all matters reserved except access - H/2022/0181	Approved
Outline application with all matters reserved for residential development comprising up to 1,200 dwellings of up to two and a half storeys in height and including a new distributor road, local centre, primary school, amenity open space and structure planting – H/2014/0428	Outline approval
Carbon capture facility for energy from waste site - 23/0090/EIS	Pending
500 houses and facilities (in doctors, nursery and schools) - 13/0342/EIS	Outline approval
Residential and facilities (employment and healthcare facilities, retail and landscaping) - 08/3644/EIS	Outline approval
Energy Recovery Facility - 22/1525/EIS	Approved
Renewable fuels and circular products facility - 23/1019/EIS	Approved
Energy from waste facility and associated buildings - 13/2892/EIS	Approved
Application for a Battery Energy Storage System (BESS) on the former landfill site at Cowpen Bewley – 24/2141/FUL	Pending

3. Environmental data

- 3.1. 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>.
- 3.2. Detailed information on the natural environment is available at www.magic.gov.uk. This includes Marine Conservation Zone GIS shapefiles.
- 3.3. 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](#).
- 3.4. 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 ([ERIC North East - Environmental Records Information Centre](#)), the local Wildlife Trust, local geo-conservation group or other recording society.

4. Biodiversity and geodiversity

- 4.1. 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.

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

5. Designated nature conservation sites

International and European sites

- 5.1. 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.
- 5.2. 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.
- 5.3. 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](#).
- 5.4. 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](#).
- 5.5. The development site is within or may impact on the following **European/ internationally designated nature conservation sites**:
- Teesmouth and Cleveland Coast Special Protection Area (SPA)
 - Teesmouth and Cleveland Coast Ramsar site
- 5.6. Table 2 sets out the potential risks of the Proposed Development on these sites.

Table 2: Potential risk to international designated sites: the development is within or may impact on the following sites		
Site name with link to conservation objective	Features which the ES will need to consider	Potential impact pathways where further information/assessment is required
Teesmouth and Cleveland Coast SPA and Ramsar Site	Breeding: - avocet <i>Recurvirostra avosetta</i> - common tern <i>Sterna hirundo</i>	<u>Supporting habitat loss within the designated site</u> The proposed pipeline will cross the River Tees, which is located within the Teesmouth and Cleveland Coast SPA/ Ramsar/ SSSI. The applicant needs to confirm the viability of using the existing tunnel infrastructure for the river crossing. Where

Table 2: Potential risk to international designated sites: the development is within or may impact on the following sites		
Site name with link to conservation objective	Features which the ES will need to consider	Potential impact pathways where further information/assessment is required
	<ul style="list-style-type: none"> - knot <i>Calidris canutus</i> - redshank <i>Tringa totanus</i> <p>Non-breeding</p> <ul style="list-style-type: none"> - little tern <i>Sternula albifrons</i>; - ruff <i>Calidris pugnax</i> - Sandwich tern <i>Thalasseus sandvicensis</i> <p>Non-breeding waterbird assemblage</p>	<p>the use of existing infrastructure cannot be demonstrated then the ES should consider a worst-case scenario for crossing the River Tees.</p> <p>The project has the potential to result in habitat losses or degradation during the construction phase. Potential impacts may arise from activities causing vibration, HDD tunnel collapse and the establishment of construction working areas</p> <p><u>Potential loss of functionally linked land</u> The proposed development has the potential to adversely affect SPA/Ramsar bird populations through permanent and temporary direct loss of functionally linked land.</p> <p>SPAs are classified for rare and vulnerable birds. Many of these sites are designated for mobile species that may also rely on areas outside of the site boundary. These habitats may be used by SPA populations or some individuals of the population for some or all of the time. These 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. This functionally linked land provides important supporting habitat for qualifying bird species, including areas for feeding, roosting and commuting</p> <p>All areas of functionally linked land should be mapped, and the function of the habitat for SPA birds identified (i.e. roosting or foraging habitat).</p> <p>Consideration of functionally linked land should include habitats for designated bird features and the waterbird assemblage component of the site (curlew, golden plover, and lapwing). Natural England advises that consideration of functionally linked land should cover a buffer of at least 7 km from the SPA / Ramsar site boundary.</p> <p>Where there are to be losses of functionally linked land this should be quantified and assessed for both temporary and permanent losses across the development site as a whole, due to the large scale of the project.</p> <p>Where losses of functionally linked land are identified to be temporary (e.g. during the pipeline construction phase) details should be provided on the time of year when the land will be unavailable for birds, the function it provides and the</p>

Table 2: Potential risk to international designated sites: the development is within or may impact on the following sites

Site name with link to conservation objective	Features which the ES will need to consider	Potential impact pathways where further information/assessment is required
		<p>period of time for reinstatement. Where possible works should be phased so temporary losses to functionally linked land occur outside of the wintering period.</p> <p><u>Changes in water quality</u> The assessment should consider the potential for changes in water quality to increase the risk of adverse effect on habitats that support the designated site.</p> <p>This should include consideration of pollution pathways during construction and operation, for example, sediment mobilisation and the risk of trenchless crossing methods collapsing or leaking drilling fluids.</p> <p><u>Increases in nutrients in the estuary</u> The site is subject to Natural England’s advice on elevated nutrient levels. See Strategic Solutions for further information:</p> <p>The Applicant should assess the potential for additional Total Nitrogen to be discharged to the catchment of the River Tees, directly or indirectly by the proposed development.</p> <p><u>Changes in air quality</u> The proposed development has the potential to result in air quality impacts on the supporting habitats of the Teesmouth and Cleveland Coast SPA/Ramsar site.</p> <p>Natural England refers the Planning Inspectorate and Applicant to the Standard Advice in Annex C for how to consider air quality impacts.</p> <p>An overall conclusion regarding impacts on statutory protected sites must consider this standard advice for air pollution.</p> <p><u>Noise and visual disturbance</u> The proposed development has the potential to result in disturbance on SPA / Ramsar bird species, both within the designated site and on functionally linked land.</p> <p>Applicants are advised to undertake appropriate modelling to establish any zones of potential bird displacement from disturbance. Noise contour mapping should be presented within the ES. These outputs should be used to inform the assessment of disturbance effects on sensitive bird receptors.</p>

Table 2: Potential risk to international designated sites: the development is within or may impact on the following sites		
Site name with link to conservation objective	Features which the ES will need to consider	Potential impact pathways where further information/assessment is required
		<p>Baseline surveys should be designed to cover the full area over which disturbance effects may occur. This should be informed by the predicted spatial extent of impacts (for example, the distance over which increased noise levels may be experienced). The non-breeding waterbird assemblage of the site includes curlew which have been shown to displace displacement at distances 650 m from an activity². The survey methodology should therefore ensure that all suitable habitats potentially affected by noise and visual disturbance are adequately captured.</p> <p>In addition to the width of the survey buffer, Natural England advises that the Applicant should ensure they have two years of survey data from within the last three years to ensure the dataset is robust. This can be supplemented by surveys undertaken for other projects in the vicinity and could be reduced if survey counts are increased. Typically, we would expect survey counts to include high and low tide bi-monthly counts.</p>

6. Nationally designated sites

Sites of Special Scientific Interest

- 6.1. Sites of Special Scientific Interest (SSSI) 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.
- 6.2. The ES should include a full assessment of the direct and indirect effects of the development on the features of special interest within these sites and identify appropriate mitigation measures to avoid, minimise or reduce any adverse significant effects.
- 6.3. The development site is within or may impact on the following **Sites of Special Scientific Interest (SSSI)**:
 - Teesmouth and Cleveland Coast SSSI
- 6.4. The development site is within or may impact on the following **National Nature Reserve (NNR)**:
 - Teesmouth NNR
- 6.5. Table 3 sets out the potential risks of the Proposed Development on this site.

² Goodship, N.M. and Furness, R.W. (MacArthur Green) Disturbance Distances Review: An updated literature review of disturbance distances of selected bird species. NatureScot Research Report 1283

Table 3: Potential risks to nationally designated sites: the development is within or may impact on the following sites		
Site name with link to citation	Features which the ES will need to consider	Potential impact pathways where further information/assessment is required
Teesmouth and Cleveland Coast SSSI (including the Teesmouth NNR)	Aggregations of breeding birds: - Avocet - Common tern - Little tern - Mixed species of Sand-dunes and Saltmarsh, Lowland open waters and their margins Aggregations of non-breeding birds: - Gadwall <i>Mareca strepera</i> - Knot - Purple sandpiper <i>Calidris maritima</i> - Redshank - Ringed plover <i>Charadrius hiaticula</i> - Ruff - Sanderling <i>Calidris alba</i> - Sandwich tern - Shelduck <i>Tadorna tadorna</i> - Shoveler <i>Anas clypeata</i> More than 20,000 non-breeding waterbirds	The impacts to the Teesmouth and Cleveland Coast SSSI bird features are as described for Teesmouth and Cleveland SPA and Ramsar site in Table 1 above. Note that the species of the SSSI are not the same as the SPA/Ramsar Site.
	Breeding harbour seals <i>Phoca vitulina</i> .	<p><u>Noise and visual disturbance</u></p> <p>The proposed development has the potential to adversely affect Harbour Seals through noise and visual disturbance from construction and operations activities.</p> <p>Seals are known to pup and haul out on Seal Sands, therefore disturbance around this area should be avoided and minimised. They also regularly haul out on Greatham Creek and have been reported hauling out upstream of the Tees, up to the Tees barrage. The assessment should consider the potential for seals to be disturbed and seek to avoid activities during sensitive periods.</p> <p>Natural England advises that disturbing activities should be avoided from May to September inclusive. This period includes the pupping period (June and July) and the moulting period (August) plus a month either side – a shoulder month – to ensure any natural fluctuation in</p>

Table 3: Potential risks to nationally designated sites: the development is within or may impact on the following sites		
Site name with link to citation	Features which the ES will need to consider	Potential impact pathways where further information/assessment is required
		<p>this sensitive period is included.</p> <p>Elevated noise levels and the presence of construction equipment and personnel may lead to disturbance at haul-out and pupping sites within the Tees estuary. Such disturbance can result in behavioural changes, including temporary displacement from haul-out sites, reduced resting time and interruption of breeding or moulting activities. These effects are particularly significant during sensitive periods such as pupping and moulting, when seals are more vulnerable to disturbance.</p> <p><u>Changes in Water Quality</u> Where hydrological connection is identified, the assessment should consider the potential for pollution impacts to habitats which support harbour seals.</p>
	<p>Fixed dune grassland</p> <p>Humid dune slacks</p> <p>Sand dune; strandline, embryo and mobile dunes</p> <p>Invertebrate assemblage bare sand and chalk</p> <p>Saltmarsh</p>	<p><u>Impacts on habitats from changes in air quality</u></p> <p>Natural England refers the Planning Inspectorate and the Applicant to the Standard Advice in Annex C for how to consider air quality impacts.</p>

Regionally and Locally Important Sites

- 6.6. The ES should consider any impacts upon local wildlife and geological sites, including local nature reserves. Local Sites are identified by the local wildlife trust, geoconservation group or other local group.
- 6.7. Where impacts cannot be avoided, 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.
- 6.8. The Proposed Development crosses part of the **Saltholme Royal Society for the Protection of Birds (RSPB) reserve**. The RSPB should be consulted on any proposed impacts to this site.

7. Protected species

- 7.1. 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](#).
- 7.2. 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.
- 7.3. 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.
- 7.4. 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.
- 7.5. 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.

District Level Licensing for great crested newts

- 7.6. Paragraph 8.3.1 Pages 72-73 of the Scoping Report notes that there are great crested newt (GCN) records within the Scoping Boundary and suitable habitats present that would likely support GCN. The report notes that the District Level Licencing (DLL) scheme may be used for the Proposed Development, subject to further technical engagement with Natural England.
- 7.7. 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.

- 7.8. 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).
- 7.9. The IACPC will also provide additional detail including information on the Proposed Development's impact on GCN and the appropriate compensation required.
- 7.10. 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.

8. Priority Habitats and Species

- 8.1. 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.
- 8.2. 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.
- 8.3. 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](#).
- 8.4. 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.
- 8.5. 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

9. Ancient Woodland, ancient and veteran trees

- 9.1. Ancient woodland is an irreplaceable habitat of great importance for its wildlife, its history, and the contribution it makes to our diverse landscapes.

- 9.2. 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.
- 9.3. 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.
- 9.4. The [ancient tree inventory](#) provides information on the location of ancient and veteran trees.
- 9.5. Paragraph 193 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.
- 9.6. Table B-4 notes that the Scoping Boundary overlaps with ten parcels of Ancient Woodland and that there are a further 82 parcels of Ancient Woodland within 500m of the Scoping Boundary. It is also stated that there are also 17 parcels of ancient woodland / ancient semi-natural woodland within 500m of the Scoping Boundary. Note that all ancient woodland types are equally protected in the NPPF.
- 9.7. The Overarching National Policy Statement for Energy (EN-1) sets out in Paragraph 5.4.33 that the assessment of ancient woodland, ancient and veteran trees should include measures to mitigate fully any direct or indirect effects of development during construction and operational phases. Paragraph 5.4.55 of EN-1 states that the Secretary of State should not grant development consent that would result in the loss or deterioration of irreplaceable habitats, including ancient woodland and ancient and veteran trees unless there are wholly exceptional reasons and a suitable compensation strategy exists.
- 9.8. Natural England and the Forestry Commission have prepared [standing advice](#) on ancient woodland, ancient and veteran trees to inform decision makers.

10. Biodiversity net gain

- 10.1. The Scoping Report confirms that the Proposed Development is committed to achieving over 10 % Biodiversity Net Gain (BNG) through habitat retention, enhancement and creation.
- 10.2. Whilst Natural England are not the statutory consultee with regard to BNG, and as such will not make detailed comments on metric calculations and compliance, we would welcome further discussion with the applicant regarding their approach to BNG delivery for this project and the opportunities it poses for enhancement.
- 10.3. BNG will become mandatory for all NSIP applications made on or after 2 November 2026. The government has recently published Biodiversity gain statements for nationally significant infrastructure projects available [here](#) and updated guidance available [here](#).

11. Landscape

Nationally designated landscapes

- 11.1. The development site is within or may impact on the **North York Moors National Park**.

Landscape and visual impacts

- 11.2. 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.
- 11.3. 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.
- 11.4. 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.
- 11.5. 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.
- 11.6. 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.
- 11.7. 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 National Landscapes, 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.
- 11.8. 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.
- 11.9. 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 final selection of the cable corridor route and method of laying should consider the landscape sensitivities of this area.

- 11.10. The National Infrastructure Commission has also produced [Design Principles for National Infrastructure - NIC](#) endorsed by Government in the National Infrastructure Strategy.

Heritage landscapes

- 11.11. The ES should include an assessment of the impacts on any land in the area affected by the development which qualifies for conditional exemption from capital taxes on the grounds of outstanding scenic, scientific, or historic interest. An up-to-date list is available at www.hmrc.gov.uk/heritage/lbsearch.htm.
- 11.12. Natural England will not be providing bespoke comments on the historic environment. We advise that Historic England should be consulted regarding this aspect of the ES.

12. Connecting people with nature

- 12.1. The ES should consider the potential impacts on the following National Trails:
- The Cleveland Way
 - The King Charles III English Coast Path
- 12.2. The National Trails website www.nationaltrail.co.uk provides further information.
- 12.3. 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 105 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.
- 12.4. 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.
- 12.5. Relevant aspects of local authority green infrastructure strategies should be incorporated where appropriate.

13. Soils and agricultural land quality

- 13.1. 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.
- 13.2. 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](#).

- 13.3. 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.
- 13.4. Detailed Agricultural Land Classification (ALC) survey may be required if one is not already available. For information on the availability of existing ALC information see www.magic.gov.uk. Natural England has provided advice in Annex B regarding the proposed survey scope set out in the Scoping Report.
- 13.5. 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).
- 13.6. The ES should set out details of how any adverse impacts on BMV agricultural land can be minimised through site design/masterplan.
- 13.7. 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.
- 13.8. Further information is available in the [Defra Construction Code of Practice for the Sustainable Use of Soil on Development Sites](#) and The British Society of Soil Science Guidance Note [Benefitting from Soil Management in Development and Construction](#).

14. Air quality

- 14.1. Natural England advises that the potential for air quality impacts arising from this NSIP needs to be assessed.
- 14.2. Natural England refers you to our standard advice on air quality impacts which can be found in Annex C. This standard advice is Natural England's formal statutory advice. It provides decision makers with the information needed to fulfil their statutory duties when making decisions on proposals with potential air pollution impacts.
- 14.3. An overall conclusion regarding impacts on statutory protected sites must consider this standard advice for air pollution.

Annex B Natural England’s detailed comments on the Scoping Report

Chapter number and topic	Section(s) referenced	Natural England’s detailed comments
Chapter 8.14 Soils and Agricultural land	8.14.1 Pages 211 and 216	<p>Page 211 of the Scoping Report notes “The Provisional ALC data cannot be used to classify individual sites due to limitations of scale and changes to the classification system. Detailed ALC surveys are required to establish the definitive grade of agricultural land. Therefore, provisional ALC grades will be verified by soil survey.”</p> <p>Page 216 in the section covering <i>Baseline data collection including surveys</i> it is noted that a hybrid methodology will be used to inform soil classification / sensitivity. The method is described as “reliance on published mapping for land identified as Grades 2 in the ES assessment. Targeted soil surveys would then be undertaken for areas of Grade 3 land to inform receptor sensitivity and to identify potential impacts and likely effects in the ES. This proportionate approach to Grade 3 BMV surveys would be undertaken when the draft Order Limits for the pipeline corridor has been refined down to approximately 100m and areas of physical disturbance are better understood”.</p> <p>Natural England notes that in mapping soil and regional ALC, the map scale is not fine enough to make any field scale interpretation, so whilst the mapping can give an indication of what might be found in an area, field surveys would be required for confirmation in the ES. Surveys allow an appraisal of the sustainability of the project and can inform the design of potential mitigation. Sufficient evidence is required in order to make an informed decision.</p> <p>Natural England advises that an ALC and soil survey of the land should be undertaken across the full Order Limits for the Proposed Development (where detailed existing ALC information is not available). It is Natural England’s view that the hybrid approach proposed will not provide enough detail to inform the EIA.</p> <p>Natural England also note that Defra has recently published the Predictive ALC map for England, which replaces the Provisional ALC mapping and therefore will need to be included in the ES and surveys proposals. The Predictive ALC map is available from the Defra Data Services Platform.</p>

Chapter number and topic	Section(s) referenced	Natural England's detailed comments
Chapter 8.3 Biodiversity and Ecology	8.3.1 Page 78 Baseline data collection including surveys	<p>This section notes that a Preliminary Ecological Assessment is planned alongside specific surveys. No details of the specific surveys proposed have been provided in the Scoping Report however, it is noted that consultation with Natural England will occur on the scope the species surveys which is welcomed.</p> <p>Natural England notes that the bird interest of the Teesmouth and Cleveland Coast SPA, Ramsar Site and SSSI is year round and that survey designs should reflect the use of the site and cover the extent of likely impacts beyond the Order Limits (such as noise or visual disturbance).</p>
Chapter 8.3 Biodiversity and ecology	8.3.1 Page 72 4.5.18 Page 37 8.3.1 Page 76	<p>Notes that "The Scoping Boundary intersects 10No. parcels of AW (irreplaceable habitat). However, with the exception of those parcels that form part of the Skelton Beck Complex LWS, all other parcels of AW or ancient semi-natural woodland (ASNW) only partially intersect the Scoping Boundary with the potential to avoid by routeing around or under them".</p> <p>It is not clear from this statement whether the ancient woodland noted as forming part of the Skelton Beck Complex LWS can be avoided by routing or by going underneath the woodland and advise that this is clarified in the ES. All loss or damage to ancient woodland should be avoided and if losses of Ancient Woodland are expected, a compensation strategy will be required.</p> <p>The woodland is adjacent to Skelton Beck which is a main river. Page 37 of the Scoping Report states that trenchless pipeline installation may be employed when crossing main rivers. If the river and the adjacent ancient woodland is to be crossed using trenchless techniques it will be important to ensure that the pits for any trenchless techniques are located away from the root zone of the ancient woodland and that any tunnel is deep enough to prevent impact to tree root systems.</p> <p>On Page 76 it is stated that the Proposed Development will be designed to embed, as far as reasonably practicable the following ecological separation zone for irreplaceable habitats, such as ancient woodland "avoiding direct loss of irreplaceable habitat with a 15m buffer". This buffer is welcomed. Natural England notes that indirect effects on ancient woodland should also be avoided.</p>

Chapter number and topic	Section(s) referenced	Natural England's detailed comments
Section 8.3 Biodiversity and ecology	8.3.1 <i>Summary of potential likely significant effects and ES Scope</i> Page 76	<p>It is proposed that effects on designated sites during the Operation, Maintenance and Decommissioning phases of the project will not be scoped into the assessment.</p> <p>Natural England disagree that effects for these phases on the sites can be scoped out at this stage as the details of the activities proposed provided in Section 4.10 (Operation and maintenance activities) and Section 4.11 (Decommissioning) are limited.</p>
Section 8.8 Landscape and Visual Impact Assessment	4.5.18 <i>Trenchless pipeline installation</i> 8.8.1 <i>Study Area</i> Pages 127-129	<p>Page 129 of the Scoping Report states that a Study area of 1km has been defined for the pipeline and a 2km area for the Above Ground Installations.</p> <p>Natural England notes that the Scoping Report states the construction of the Proposed Development would include the presence and views of "laying of below ground pipelines including the use of plant and machinery associated with trenchless and open-trench techniques". There is no further detail of visual impacts from open trench techniques provided. If features are to be crossed using a trenchless pipeline installation methods (described in Paragraph 4.5.18), there could be visual effects from the launch and reception areas to consider during the construction phase. Natural England advises that a 2km Study area of the pipeline should also be applied. Natural England would expect any national landscape designated within 2km of the Order Limit boundary to be assessed.</p> <p>It is noted that page 129 states "The study area may be refined up or down but will be proportionate and focused on those areas where significant landscape and visual effects are likely to occur, including consideration of the North York Moors National Landscape just beyond 2km." This statement is welcomed by Natural England.</p>

Annex C: 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 NO_x)
- nitrogen deposition
- acid deposition
- sulphur dioxide (SO₂)

Standing advice on air pollution and development is also available here: <https://www.gov.uk/guidance/air-pollution-and-development-advice-for-local-authorities>

Whilst the standing advice does not cover NSIPs, it does include additional technical advice which may prove useful. However, in summary, Table 1 provides the steps that we advise should be taken to assess air quality impacts on protected sites. The applicant should provide their own assessment containing the information and detailed modelling you need. You need to review this and make your own conclusion.

Table 1: Sequential approach to air quality assessments

Stage	Step	Supplemental evidence/ basis for judgment
Initial screening for credible risk of an effect	1 Check Distance criteria - could significant emissions reach a protected site? Yes = move to Step 2 No = no further HRA required	The Air Pollution Information System (APIS) includes an introduction to air pollution. APIS provides site specific information on the interest features of individual protected sites and the sensitivity to air quality impacts of those features. Please see Table 2 for industrial air pollution screening distances. For road traffic impacts, roads on the affected road network that lie within 200m of a designated site should be considered. Use Magic Map to check the location of designated sites. Search for the location then select the 'Designations' option.
	2 Check if the qualifying habitats or supporting habitat of qualifying species are sensitive to air quality impacts. Yes = move to Step 3 No = no further HRA required APIS Site relevant Critical Loads and Levels (based on literature and professional judgement) http://www.apis.ac.uk/src Some habitats may not have a critical load because there is not enough data. In these cases, you should find the critical load for a similar habitat type or feature.	The qualifying features of Habitats Sites can be identified in the relevant Site Conservation Objectives and Supplementary advice packages, which include a definitive list of legally qualifying features. These objectives are available here . Alternatively, a list of qualifying features can also be found by searching for the Habitats Site and SSSIs on Designated Sites View , alongside Conservation Objectives and Supplementary Advice for Habitats Sites. The above links will also show whether any of the qualifying features for Habitats Sites have a Restore or Maintain Conservation Objective in relation to air quality thresholds (critical levels or loads). If the site is a SPA or an SAC/SSSI designated for an animal species (as opposed to a habitat), determine whether the predicted pollution effects on the supporting habitat will have a negative effect on the notified species.

Stage	Step	Supplemental evidence/ basis for judgment
Detailed AQ modelling	<p>3 Undertake detailed modelling using a recognised dispersal model – i.e. Atmospheric Dispersion Modelling System (ADMS)</p> <p>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.</p>	<p>Air Quality modelling should include relevant scenarios that are clearly identified.</p> <p>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).</p> <p>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.</p> <p>At least 3 years of meteorological data should be included within the AQ modelling for sources other than for road transport modelling</p> <p>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</p>
Applying screening thresholds	<p>4a Apply Screening Threshold Alone If below threshold alone, move to step 4b. If above = move straight to step 5</p>	<p>Ascertain the Process Contribution (PC) from the plan or project (emissions and predicted deposition). Apply Screening threshold (1% of critical level or load) alone using the <u>annual averages</u>.</p> <p>If the process contribution is less than 1% of the relevant long-term benchmark (Environmental Assessment Level, Critical Level or Critical Load), the emission is not likely to have a significant effect <u>alone</u> irrespective of the background levels.</p>

Stage	Step	Supplemental evidence/ basis for judgment
	<p>4b Apply Screening Threshold In-combination. If below threshold in-combination = no LSE/significant risk of damage etc and no further assessment required. If above = move straight to step 5</p> <p>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.</p>	<p>Use information from competent authorities (Planning Portal, PINS NSIP register or Environmental Permitting register) to determine if there are plans or projects in the pipeline (not included in the current baseline) that should be considered in-combination</p> <p>If the combined process contribution is less than 1% of the relevant long-term benchmark (Environmental Assessment Level, Critical Level or Critical Load), the emission is not likely to have a significant effect <u>in-combination</u> irrespective of background levels.</p>
<p>Detailed Assessment of ecological impacts</p>	<p>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.</p> <p>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.</p> <p>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.</p> <p>If Habitats Sites are impacted by the proposals, move to Step 6.</p>	<p>The following information is likely to be helpful for the decision maker:</p> <p>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?</p> <p>Check APIS Trends Tab for reasonable expectation on whether background pollution may be decreasing or not.</p> <p>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.</p>

Stage	Step	Supplemental evidence/ basis for judgment
Appropriate Assessment (AA) for habitats sites	<p>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.</p> <p>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.</p> <p>Should compensation measures be required under derogation, please contact Natural England for specific advice.</p> <p>Note: If an AA has been undertaken of the proposals <u>alone</u> and concluded that there will not be an adverse effect on integrity, if there are residual impacts that are not fully mitigated, these will need to be considered in combination with other plans or projects</p>	<p>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 (i.e. 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.</p> <p>When deciding on whether the proposals set out in the NSIP will have an adverse effect on Integrity of a Habitats Site, the Conservation Objectives and any supplementary advice should be taken into account. Including whether the site is already exceeding the environmental thresholds for ammonia, nitrogen oxides and nitrogen deposition and has a restore conservation objective.</p>

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 Monitoring¹ 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 NO_x – using one of three sets of emission factors available). However, the User Guide to the EFT highlights that calculation tools only support assessment years 2018 up to 2030, reflecting that predictions and assumptions beyond then become less certain. Where EFT calculated emissions are to be used after 2030 to inform air quality assessments, the EFT indicates that appropriate caveats around the limitations of the analysis must be included to accompany the assessment. We therefore advise that emission factors no later than 2030 are used for HRAs– which would mean percentages of EVs are at predicted 2030 levels. A key concern is that, although EVs themselves have no tailpipe emissions, and the percentage of them will increase, the remaining combustion engine vehicles on the road may become more polluting as they age as selective catalytic reduction technology may create ‘ammonia slip’ over time. Ammonia slip is the unreacted ammonia (NH₃) that escapes from a selective catalytic reduction (SCR) or selective non-catalytic reduction (SNCR) system used to reduce NO_x in exhaust gases.

Motorways within the affected road network

There is potentially an added complexity to the need for in-combination assessments when considering traffic on motorways, as including these roads can mean that the assessment takes account of traffic growth related to strategic factors or long range (external) trips that are independent of the specific plan or project and neighbouring plans or projects. These roads are strategically important and tend to have high volumes of traffic as well as being well represented in traffic models. The air quality assessment should therefore include traffic flows on these roads, but the external trips can be excluded from the initial screening assessment. A justification and explanation of which journeys are included and excluded in the traffic model should be provided.

The conclusions reached on the air pollution impacts of the HRA must be incorporated into the wider HRA conclusions for other impact pathways identified for the proposals.

How to Use this Advice in Decision Making

Provided you have followed the above advice and have been able to conclude there would be no adverse effects on any protected sites we would be able to agree with your decision to authorise the project

From: [REDACTED]@northyorkmoors.org.uk>

Sent: 22 June 2026 16:01

To: East Coast Hydrogen Pipeline – Teesside

<eastcoasthydrogenteesside@planninginspectorate.gov.uk>

Cc: [REDACTED]@northyorkmoors.org.uk>; Planning <planning@northyorkmoors.org.uk>

Subject: EN0710010 - East Coast Hydrogen Teesside Pipeline - EIA Scoping and Consultation

You don't often get email from [REDACTED]@northyorkmoors.org.uk. [Learn why this is important](#)

Dear Sir/Madam,

Whilst the proposed pipeline route does not fall within the North York Moors National Park, the eastern wing of the proposed line falls within a few kilometres of the National Park for much of its length and therefore impacts on the National Park must be assessed as part of the Environmental Statement. The National Park urges the applicant to ensure that the Environmental Statement assesses harm based on worse-case scenario, particularly in relation to the construction period to give an accurate assessment of the significance of impacts. Potential impacts that give rise to concern and in the view of the National Park Authority should form part of the Environmental Statement include:

- Light pollution impacting dark skies qualities, notably during construction and from any retained above ground infrastructure required.
- Air pollution (including but not limited to sulphur dioxide and nitrous oxides) and dust, notably during construction, including the movement of vehicles through or close to the National Park, and the associated impacts on designated sites as well as broader ecological features.
- Impacts on irreplaceable habitat, such as Ancient Woodland, and Local Wildlife Sites that provide essential connectivity for wildlife moving into and from the National Park.
- Impacts on species which may form part of a larger ecosystem and thus lead to knock on impacts to biodiversity with the National Park.
- Landscape harm, with visual intrusion on views into and from the National Park on its northern edge, particularly during construction but also connected to any retained above ground infrastructure.
- Potential for impacts during construction on tourism and the second purpose of the National Park as a result of harm to pedestrian amenity for users of the Cleveland Way National Trail

We would respectively remind East Coast Hydrogen of their obligations under section 245 of the Levelling-up and Regeneration Act 2023, which requires relevant authorities to seek to further the purposes of the National Park when exercising or performing any functions in relation to, or so as to affect, land in any National Park in England.

Kind Regards

[REDACTED]

Senior Planner (Minerals & Major Developments)

North York Moors National Park Authority
The Old Vicarage
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YO62 5BP

Web: www.northyorkmoors.org.uk

Please note I do not work on a Tuesday



North York Moors
National Park

CONFIDENTIALITY: The contents of this message are the views of the author, not necessarily the views of the North York Moors National Park Authority. This is a private message intended for the named addressee(s) only. Its contents may be confidential. If you have received this message in error please reply to say so and then delete the message. Any use, copying, disclosure or distribution by anyone other than the addressee is forbidden.

www.northyorkmoors.org.uk

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Northumberland County Council

[REDACTED]
The Planning Inspectorate
Temple Quay House
2 The Square
Temple Quay
Bristol
BS1 6PN

Planning Ref: 26/01925/CNA
Your Ref:
Contact: [REDACTED]
Direct Line: [REDACTED]
E-Mail: [REDACTED]@northumberland.gov.uk
Date: 25th June 2026

Dear Sir/Madam,

TOWN & COUNTRY PLANNING ACT 1990
Town and Country Planning (Development Management Procedure) (England)
Order 2015

Proposal Comments to be submitted by 25 June 2026 - Consultation to inform the Scoping Opinion - Reference: EN0710010

Location East Coast Hydrogen Teesside Pipeline

Applicant [REDACTED] The Planning Inspectorate

I would confirm that Development Management have **No Objection** to the above consultation.

Yours Faithfully

[REDACTED]
Planning Officer

From: [REDACTED]@PDPorts.co.uk>

Sent: 24 June 2026 16:36

To: East Coast Hydrogen Pipeline – Teesside

<eastcoasthydrogenteesside@planninginspectorate.gov.uk>

Subject: RE: EN0710010 - East Coast Hydrogen Teesside Pipeline - EIA Scoping and Consultation and Regulation 11 Notification

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

Dear 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 Teesside Pipeline (the proposed development)

Scoping Opinion consultation

Further to your letter requesting information we consider should be included in the Environmental Statement (ES) for the above-mentioned project.

PD Teesport Limited (PDT) is seeking to work positively with the Applicant and believes that its knowledge and experience of the harbour area can assist the Applicant in successfully advancing its proposals whilst minimising its impacts on surrounding businesses.

The works proposed to be authorised by the project would be constructed within PDT's limits of jurisdiction and the project's construction and operation could potentially adversely affect PDT's harbour undertaking and other harbour users.

PDT considers that the ES should assess impacts arising from the following matters:

- 1) works in, on and under the River Tees, especially any works that may affect navigation, those which may change the river bed or the ability to dredge the river bed from time to time in accordance with PDT's statutory duties and any works in relation to pipelines or conduits crossing beneath the river and associated riverside portals.
- 2) Any obstruction to access within the port/jurisdictional area.
- 3) Any proposal to utilise the river for the transport/delivery of construction materials.

We recommend the applicant supplies full parameters for any such operations as well as plans, specifications and construction methodologies (including programme and mitigations) in advance to ensure that PDT can comment in good time on the proposed scheme.



██████████
Senior Property Manager

17-27 Queen's Square, Middlesbrough, Cleveland, TS2 1AH

Tel: ██████████ | Fax: ██████████

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██████████@pdports.co.uk | www.pdports.co.uk

Twitter: [@pdports](https://twitter.com/pdports)

From: Parish Clerk <clerk@redmarshall-pc.gov.uk>

Sent: 09 June 2026 16:51

To: East Coast Hydrogen Pipeline – Teesside
<eastcoasthydrogenteesside@planninginspectorate.gov.uk>

Subject: Re:EN0710010 - East Coast Hydrogen Teesside Pipeline - EIA Scoping and Consultation and Regulation 11 Notification

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Hello

I can confirm that Redmarshall Parish Council have no comments to make about the East Coast Hydrogen Teesside Pipeline - EIA consultation.

Redmarshall Parish Council would like to be informed about the project as it progresses, please can you note the new email address shown below.

Please note the new email address for Redmarshall Parish Council is clerk@redmarshall-pc.gov.uk Please update your contact details, thank you.

Kind Regards


Parish Clerk
Redmarshall Parish Council



Proposed DCO Application by Northern Gas Networks for East Coast Hydrogen Teesside 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 14 operational Royal Mail properties within 10km of the proposed scheme.

The construction of this infrastructure proposal has been identified as having potential to impact on Royal Mail operational interests, particularly given the impact the proposed development could have on the Strategic Road Network. However, at this point in time Royal Mail is not able to provide a consultation response due to insufficient information being available to adequately assess the level of risk to its operation and the available mitigations for any risk. Consequently, Royal Mail wishes to reserve its position to submit a consultation response/s at a later stage in the consenting process and to give evidence at any future Public Examination, if required.

In the meantime, any further consultation information on this infrastructure proposal and any questions of Royal Mail should be sent to:

████████████████████@royalmail.com), Senior Planning Lawyer, Royal Mail Group Limited

████████████████████@struttandparker.com), Strutt & Parker.

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

End



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██████████
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25 June 2026

Dear ██████████

**Proposed Application by Northern Gas Networks for an Order Granting
Development Consent for The East Coast Hydrogen Teesside Pipeline**

Scoping Consultation

Ref: EN0710010

We refer to your letter dated 29th May 2026 and respond as follows to the scoping consultation. Please refer all future correspondence to DLGBRTEECCompanySecretary@sembcorp.com.

INTRODUCTION

- 1.1 This consultation response is made by Sembcorp Energy UK Limited ("**Sembcorp**") in relation to the scoping consultation and notification made by Northern Gas Networks (the "**Applicant**") for the East Coast Hydrogen Teesside Pipeline development (the "**Project**").
- 1.2 Sembcorp Energy UK (SEUK), a wholly-owned subsidiary of Sembcorp Industries, is a leading provider of sustainable solutions supporting the UK's transition to net zero. SEUK is a leading provider of energy and utilities infrastructure supporting the UK's transition to net zero.
- 1.3 Sembcorp's Wilton International site, within the Teesside Freeport, sits amongst a hub of decarbonisation innovation. At the site, Sembcorp provide critical infrastructure including power, steam, water and utility services to a major cluster of energy-intensive and process industries via our private wire network with electricity generated by gas and biomass.
- 1.4 Wilton is a nationally significant multi-occupancy industrial site and forms part of the Teesside industrial cluster within the East Coast Cluster. It is a strategically important location for industrial decarbonisation, with an extensive network of utility infrastructure, including pipeline corridors connecting Wilton, Billingham and North Tees.
- 1.5 Sembcorp plays a central role in the provision, operation and coordination of infrastructure across this cluster, including the management of pipeline corridors which facilitate the transportation of industrial gases, feedstocks and other materials between major industrial users.

- 1.6 These services are complemented by a fleet of fast-acting, decentralised power stations and battery energy storage sites situated throughout England and Wales. These flexible assets deliver electricity to the national grid, helping to balance the UK energy system and ensure reliable power for homes and businesses.
- 1.7 Sembcorp Industries is a leading energy and urban solutions provider, driven by its purpose to do good and play its part in building a sustainable future.
- 1.8 Sembcorp supports the principle of the Project and its role in enabling hydrogen infrastructure; however, it is important that the Environmental Statement (“ES”) fully assesses the interaction of the Project with existing strategic infrastructure, industrial operations and existing proposed developments.

Corporate and Financial Information

- 1.9 Sembcorp Industries (Sembcorp) is a leading energy and urban solutions provider, led by its purpose to drive energy transition.
- 1.10 Headquartered in Singapore, Sembcorp delivers sustainable solutions to support energy transition and urban development by leveraging its sector expertise and global track record.
- 1.11 By focusing on growing its Renewables business, it aims to transform its portfolio towards a greener future. Sembcorp has a balanced energy portfolio of 35.2GW, including 21.9GW of gross renewable energy capacity comprising solar, wind and energy storage, across 12 countries.
- 1.12 The company also has a proven track record of transforming raw land into sustainable urban developments, with a project portfolio spanning over 17,600 hectares across Asia and have generated over 466,000 employment opportunities and attracted US\$64 billion of investment capital.
- 1.13 Sembcorp is listed on the main board of the Singapore Exchange. It is a constituent stock of FTSE Russell Index, MSCI Singapore Index, Straits Times Index as well as sustainability indices including FTSE4Good Index, iEdge SG ESG indices and several MSCI ESG indices.

The role of Wilton in the UK and local economy

- 1.14 At our Wilton International site (“Wilton”) Sembcorp supplies customers with the development land, energy and utilities they need. Based in Teesside and part of the East Coast Cluster the site is in a prime location for the future of decarbonised power, offering direct access to a skilled workforce alongside potential Freeport tax incentives. For investment by energy-intensive industrial businesses, Wilton International is ready-to-go with established supply chains and multimodal freight logistics. This includes the operation of a private electricity grid as well as the management and control of a significant network of pipeline corridors connecting Wilton and other industrial businesses located within the other clusters at Billingham and North Tees. The pipeline corridors enable the transportation of industrial gases, raw materials and feedstock seamlessly between manufacturers, storage and process plants.
- 1.15 Wilton, where Sembcorp’s primary UK industrial power and other utility assets are located, is one of the UK’s leading multi-occupancy industrial and manufacturing sites, with the products made there being both of national importance and generating millions of pounds in export revenues annually for the UK economy.

- 1.16 Wilton is a large industrial / manufacturing site located between Redcar and Middlesbrough, to the south of the former steel-making enclave now being redeveloped by Teesworks and Teesport and to the north of the A174 Redcar - A19 dual carriageway. Initially developed by the former Imperial Chemical Industries conglomerate ("ICI"), Wilton was officially opened in the early 1950s as a major integrated petrochemical facility, supported by internal electricity generation facilities. Following divestment by ICI in the late 1990s, Wilton continues to contain major petrochemical process plants, and it now hosts diversified businesses in a variety of fields including energy generation, plastic recycling and process research together with office accommodation, production and research facilities. Raw materials are imported to and exported from Wilton via marine terminals at Teesport and North Tees, by pipeline, by road and by rail.
- 1.17 Wilton's operation is split between Sembcorp (as a freeholder and integrated infrastructure provider to the entire complex) and a series of individual process and related industrial undertakings. A number of multinational chemical companies now operate on the site and more than £1 billion has been spent by companies at Wilton in recent years. This includes in excess of £200 million by Sembcorp to date in new and improved assets. Sembcorp has constructed a 300 MWh Battery Energy Storage System (BESS) at Wilton International, increasing its BESS capacity in the UK to 420MWh. This builds on Sembcorp's commitment to delivering a low carbon and energy secure future for the UK, including pioneering new technologies such as the UK's first ever wood-fired power station, Wilton 10 – built by Sembcorp at Wilton and part fueled by locally processed waste wood material. Sembcorp pioneered biomass-fueled power in 2007, which led to the company shutting down the last of its coal-fired boilers at Wilton Power Station in 2014, ahead of the Government's 2015 commitment to phase out coal over the next 10 years. In 2016, Sembcorp's waste-to-resource facility came online, diverting 440,000 tonnes of landfill waste per year. In 2018 Sembcorp's UK operations expanded outside of Wilton International with 40+ rapid-response energy generation and battery energy storage system (BESS) sites across England and Wales. In 2019 Sembcorp's first 60MWh BESS came online across three sites, doubling in 2022, and now stands at 120MWh.
- 1.18 Other significant investment at Wilton includes £250 million by SABIC on its Low Density Polyethylene plant (the world's largest such facility), £350 million on Crop Energies' Ensus bioethanol plant and a new £250 million energy from waste facility in which Sembcorp is a major stakeholder. Further Mura Technologies commenced operations of its advanced plastic recycling facility at Wilton in 2026.
- 1.19 At its peak, over 4,500 people were employed at Wilton, with up to a further 1,600 contractors visiting the site each weekday. While the figures are currently lower, thousands of jobs are supported through the supply chains of businesses based at the site, which include SABIC, Ensus, Alpek Polyester UK, Huntsman, Biffa Polymers, Nippon Gases, Anglo American, Renew ELP, Mura Wilton and ENVA amongst others. The significance of these businesses cannot be overestimated. For instance, Biffa's polymer recycling plant has recycled over 3 billion plastic milk bottles in the last decade, Alpek produces enough PET for eight billion bottles a year and Anglo American's £3bn project at Wilton – processing polyhalite which is mined 37km south of Whitby – is one of the largest infrastructure projects in the UK.
- 1.20 Wilton International hosts a growing cluster of companies across polymers, chemicals, biofuels, recycling and advanced energy storage, alongside major new projects—including LanzaJet's SAF facility, NatPower UK's planned 1 GW/8 GWh battery energy storage system (Teesside GigaPark), Willis Sustainable Fuels' SAF plant, and the onshore electricity converter stations for the Dogger Bank Offshore Wind Farm, recently constructed by Sofia (RWE) & SSE - underscoring Teesside's role as a hub for sustainable innovation and grid flexibility.

- 1.21 Sembcorp actively markets Wilton with a view to securing inward investment and further growth. The Northeast of England is recognised and promoted by the Department for International Trade as a leading location in the UK for foreign direct investment into various chemistry using industries. Wilton's status as a multi-occupancy business and research centre is a key attraction. The complex is one of the largest R&D facilities in Europe and is home to the Centre for Process Innovation ("CPI"), part of the Technology Strategy Board's (also branded as Innovate UK) High Value Manufacturing Catapult network. CPI is a British technology and innovation centre which was established in 2004 by the UK Government agency ONE NorthEast as one of five centres of excellence in a long-term strategy to "reposition the North-East of England on the world stage for research and development". CPI helps companies to develop, prove, prototype and scale-up new products and processes by providing access to facilities, expertise and networks of public and private funders. CPI continues to expand its national role, opening new centres and leading major innovation programmes in sustainable manufacturing, pharmaceuticals, health and technology. Accordingly, Wilton's continued success forms a key part of the Government's long-standing economic and trade strategy for the UK.
- 1.22 Wilton is also one of the main sites used by the economic cluster body the Northeast of England Process Industry Cluster ("NEPIC"). An economic or business cluster is a geographic concentration of interconnected businesses, suppliers, and associated institutions in a particular field. Clusters have the potential to affect competition in three ways: by increasing the productivity of the companies in the cluster; by driving innovation in the field; and by stimulating new businesses in the field. Clusters increase the productivity with which companies can compete, nationally and globally.
- 1.23 NEPIC has been created by the chemistry using industries based in Northeast England – including many Wilton-based businesses – where more than 1,400 companies are locally based in the supply chain for this vital sector. A 2024 report focusing specifically on the region's high-value pharmaceutical manufacturing cluster, a key segment of NEPIC, highlights its exceptional economic contribution. This segment alone employs more than 5,600 people, an increase of 51% since 2017, and contributed over £1.52 billion in Gross Value Added (GVA) to the UK economy in 2021. This represents an 89% real-terms growth in GVA between 2016 and 2021, the highest of any UK region outside of London. The productivity of this cluster is demonstrated by a GVA per worker of over £200,000, far exceeding the regional average. The cluster is a major exporter, with sites exporting an average of 80% of their products, and has seen over £850 million in capital investment since 2017. Sembcorp is a long-standing member of NEPIC and support their annual awards and events including their Clean Growth Conference. In 2023 Sembcorp were winners of NEPIC's Apprenticeship Employer of the Year and Communities and Reputation awards.
- 1.24 To sustain cluster performance in the long term, strong inter-organisational relationships within the cluster are vital, including important aspects of strategic management of the essential supporting infrastructure. In the case of Sembcorp, this includes the strategic management of multiple functional utility pipelines comprising the Sembcorp Pipeline Corridors (see detail below) across the Wilton International site and wider Teesside area.
- 1.25 Wilton thus forms part of an important cluster of petrochemical, specialty and other process manufacturing businesses of local, regional and national economic significance. Sembcorp plays a central role as part of that cluster.
- 1.26 Wilton itself is an industrial and manufacturing hub of national importance and whilst overall Sembcorp supports the concept of the Project, Sembcorp is concerned of the impact the Project may have on it, Wilton and a number of the existing industrial businesses across Teesside.

Sembcorp's role

- 1.27 Sembcorp supplies the major industrial businesses at Wilton with secure and reliable supplies of electrical power, steam, water (raw, potable and demineralised), and other services, using greener, more sustainable power generating facilities. It also owns much of the land available for development on the site. Wilton's 'ready-to-go' site solution integrates energy, development land, infrastructure, utilities and security, supported by the site's extensive network of internal infrastructure, providing gas, electricity, water, steam, drainage, Compressed air, Brine, Nitrogen Cavities, reservoirs, pipe and road connectivity, moving inputs, products, by-products and wastes between different production facilities – both within and out with the Wilton complex itself. This includes:
- 1.27.1 on-site energy generation utilising multiple assets with National Grid backup to ensure energy security, resilience and cost savings;
 - 1.27.2 established industrial infrastructure ready to deliver the utilities, feedstocks, industrial gases and products needed by investing businesses;
 - 1.27.3 a range of large-scale, fully serviceable development plots are available, with flexible tenancies and some with pre-consented planning – enabling quick and convenient 'plug-and-play' property solutions and enabling businesses to reduce investment project costs, risk and timeframes; and
 - 1.27.4 specialist site safety and security teams compliant with all applicable standards demanded by major process industry companies, including COMAH regulations.
- 1.28 For investing in energy-intensive industrial businesses, this delivers competitive advantage through reduced costs, risk and project timeframes.
- 1.29 Sembcorp also provides the essential pipeline route and associated infrastructure between Wilton and Billingham via North Tees ("Sembcorp Pipeline Corridor"). The Sembcorp Pipeline Corridor carries a variety of industrial gases, raw materials and feedstock including natural gas, fuel oils, nitrogen and hazardous chemicals. These are produced or used by major multinationals and household names including Sabic, BOC, Ineos and Huntsman. The Sembcorp Pipeline Corridor connects directly into Wilton's substantial network of service corridors (also known as vein lines), which themselves incorporate established pipelines, cables, cable routes & supports, culverts, bridges, pipe supports and anchor blocks.
- 1.30 Importantly, the Sembcorp Pipeline Corridor provides pipeline connection capability to:
- 1.30.1 A significant number of top tier COMAH sites both on Wilton, Seal Sands and Billingham Industrial Clusters.
 - 1.30.2 The UK's ethylene distribution network, with Teesside being the central node and the only chemical cluster to provide combined storage and export facilities on the system.
- 1.31 Sembcorp takes on a key role in respect of the Sembcorp Pipeline Corridor: managing, maintaining, patrolling and facilitating both the use of the corridor and the shared apparatus infrastructure and any works within it (see further below). Sembcorp acts as a central body for the management of the Sembcorp Pipeline Corridor (as distinct from its parallel capacity as a landowner) and this co-ordinating function provides significant economic and strategic value.
- 1.32 In addition, Sembcorp coordinates all users use of the Sembcorp Pipeline Corridor, in terms of both routine communication and in the management of all works, from routine assurance to future proposals and enhancements. As such, the value of Sembcorp's involvement to the cluster, the region

and the UK is conceptually different to and wider than a mere land interest and should be recognised accordingly.

- 1.33 If compulsory acquisition rights are included in the DCO in relation to the Sembcorp Pipeline Corridor then Sembcorp's ability to service its other customers and to continue to provide this vital collaborative function may be adversely impacted and thus compromising Sembcorp's purpose and vision in building a sustainable future within the UK.

The legal framework governing the Sembcorp Pipeline Corridor

- 1.34 Sembcorp is a freeholder, leaseholder and rights holder pursuant to several deeds in and around the Teesside area. As the owner and controller of the complete Sembcorp Pipeline Corridor, Sembcorp has granted several packages of rights to its customers to use the Corridor, including use of the surrounding land for access and maintenance to apparatus and infrastructure.

- 1.35 There are broadly two main categories of apparatus and infrastructure:

1.35.1 Shared Apparatus and Infrastructure is the equipment and civil structures that Sembcorp or its predecessors have built and provided for its customers to provide a readily useable route for new pipelines and other apparatus. All customers are able to make shared use of this equipment (where provided for in their package of rights) and Sembcorp maintains it in exchange for an annual pipeline infrastructure charge.

1.35.2 Exclusive Apparatus Infrastructure is the equipment that customers build within the Sembcorp Pipeline Corridor for their sole purpose and use, where other customers are not entitled to use it. It should be noted that Exclusive Apparatus Infrastructure is still subject to Sembcorp's direction and consent to design.

- 1.36 Sembcorp grants rights to its customer by way of deed to use the Sembcorp Pipeline Corridor for the transmission of waste, water, natural gas, nitrogen and many other substances for the customers' specific businesses and third parties.

- 1.37 In this regard, the various packages of rights granted by Sembcorp over the Sembcorp Pipeline Corridor generally provide for the following functions to be exercised by Sembcorp in the wider interest:

1.37.1 management including the organisation and coordination of activities within the Sembcorp Pipeline Corridor, such as communication to customers via the distribution list of any works or proposals (new customers, new works and maintenance) that will be taking place, liaison with other landowners where relevant and the operation of a diary and plan for upcoming maintenance activities, so as to ensure customers' apparatus is not damaged, works are coordinated and managed safely, and that in so far as is possible business is not interrupted. This also includes overseeing the protective provisions as between asset owners provided for in the relevant packages of rights i.e. Sembcorp will not consent to any one asset owner, undertaking works in the Corridor unless that asset owner has gone through the applicable process of notifying the other asset owners of the details/method statement etc. and affording those other asset owners an opportunity to specify what protective measures need to be put in place to protect their respective assets during any those works;

1.37.2 maintenance of the Shared Apparatus and Infrastructure within the Sembcorp Pipeline Corridor more generally and provision of access and accessways, including effecting

repairs (planned and reactive) and patrolling the Corridors and alerting customers to any major defects or issues identified by those patrols;

- 1.37.3 facilitation including:
- 1.37.3.1 access onto the Sembcorp Pipeline Corridor and adjoining property for the purpose of carrying out inspections and/or works to a customer's own apparatus or Exclusive Apparatus Infrastructure;
 - 1.37.3.2 liaising with other customers in respect of any proposed works;
 - 1.37.3.3 scheduling the works, issuing inductions, ensuring safe systems of work and issuing access permits in accordance with the relevant works provisions;
 - 1.37.3.4 reviewing method statements, monitoring design and safety reviews;
 - 1.37.3.5 producing and issuing a 'mod' form in respect of any proposed works and reviewing specified qualifying activities;
 - 1.37.3.6 attending customers' project meetings and/or process reviews; and
 - 1.37.3.7 monitoring and auditing any works conducted.
- 1.38 Sembcorp's role is underpinned by this interconnected web of reciprocal rights and obligations. These are essential in order for Sembcorp to discharge its functions and to ensure the on-going safe operation of the apparatus and infrastructure. The rights are enforceable against Sembcorp as the contracting party to the easements or licences and, conversely, Sembcorp is able to enforce customers' obligations in order to protect the collective interest in the safe, efficient and effective operation of the Sembcorp Pipeline Corridor and the businesses that use it whether at Wilton or elsewhere upon Teesside.
- 1.39 As part of the Project, the Applicant may seek compulsory powers for the purchase and/or creation of new rights over various plots which Sembcorp either owns, occupies or in which it has interests. The Applicant may also take powers to extinguish, suspend or interfere with the use of Sembcorp apparatus and or infrastructure rights and impose new restrictions on such land. Sembcorp wholly opposes this position but is ready and willing to engage with the Applicant in meaningful discussions to allow the Applicant to achieve its objectives without compromising the safety and security of the Sembcorp Pipeline Corridors.

East Coast Hydrogen Pipeline Corridor and Above Ground Installations (AGI) Proposal

- 1.40 Due consideration must be made by the Applicant of the currently consented and proposed developments, on and in the vicinity of the Project, including:
- 1.40.1 the consented Net Zero Teesside Development Consent Order granted 16th February 2024. This project has since achieved a final investment decision in December 2024, with construction starting in mid-2025 and commercial operations scheduled for 2028. It represents a landmark £4 billion investment in the region. This DCO has a significant impact across the land proposed for the Project;

- 1.40.2 the proposed Alfanar, Lighthouse Green Fuels development consent order and sustainable aviation fuels project now located at a larger site in Seal Sands. This £2 billion+ project is the UK's most advanced dedicated SAF project, having completed its Front-End Engineering Design (FEED) in June 2026. It targets a final investment decision by late 2027 and is projected to be operational in 2032; and
 - 1.40.3 the current planning application for a data centre campus of national strategic importance on land within the Wilton Estate. This application forms part of the wider Teesside AI cluster being encouraged by central and local government.
- 1.41 It is noted that the Project pipeline route and AGI's propose to cross the Sembcorp pipeline corridors, border the Wilton Estate and access significantly into the Wilton Estate. There has been no advanced notice of the specific redline boundary for the Project and the current consultation has not been explained or notified by the Applicant in advance of this formal notice.

The Project's Environmental Statement

- 1.42 The Environmental Statement ("ES") should identify and assess the interaction between the proposed pipeline route and Above Ground Installations ("AGIs") and existing strategically important industrial infrastructure within the Teesside cluster, including but not limited to the Sembcorp Pipeline Corridor and associated utility networks.
- 1.43 The ES should:
- 1.43.1 clearly define the redline boundary, land take and construction footprint
 - 1.43.2 Identify areas where the Project interacts with established industrial infrastructure
 - 1.43.3 assess the implications of such interactions on ongoing operations
- in sufficient detail to enable affected landowners and operators to understand the extent of potential interaction with existing infrastructure.
- 1.44 The ES should include a detailed assessment of the interaction between the Project and existing pipeline infrastructure, including operational utility corridors serving industrial users across Teesside.
- 1.45 In particular, the ES should:
- 1.45.1 Identify the location, function and operational importance of existing pipeline corridors
 - 1.45.2 Assess the potential for temporary and permanent disruption during construction and operation
 - 1.45.3 Assess risks to the safe and efficient operation of existing infrastructure, particularly where the corridor serves multiple industrial users
- 1.46 The ES should also assess health and safety implications, including interactions with sites subject to the Control of Major Accident Hazards (COMAH) Regulations, consistent with the inclusion of "Major Accidents and Disasters" within the scoped EIA topics.
- 1.47 The ES should demonstrate how construction methods, crossing points and proximity distances have been designed to avoid or minimise disruption and risk.

- 1.48 The ES should assess the potential effects of the Project where it may require compulsory acquisition, creation of new rights, or interference with existing land interests and infrastructure rights, including those associated with operational pipeline corridors.
- 1.49 This assessment should include:
- 1.49.1 Effects on ongoing operations and maintenance of existing infrastructure
 - 1.49.2 Constraints on future development and upgrade works
 - 1.49.3 Effects arising from restricted access or altered working arrangements
- 1.50 The Applicant should demonstrate how the Project has been designed to avoid or minimise disruption, including through appropriate routing, separation distances, construction techniques and crossing methodologies.
- 1.51 The ES should assess the potential effects where the Project may require:
- 1.51.1 Compulsory acquisition of land
 - 1.51.2 Creation of new rights
 - 1.51.3 Cancelling, removing, modifying or destroying of existing rights
 - 1.51.4 Interference with existing land interests and infrastructure rights
- 1.52 In particular, the ES should assess the effects on:
- 1.52.1 Ongoing operation and maintenance of existing infrastructure
 - 1.52.2 Access arrangements and working practices
 - 1.52.3 Future development and upgrade capability of infrastructure corridors
- 1.53 The ES should explain how such effects have been avoided or minimised through design and how any residual effects will be mitigated.
- 1.54 The ES should also set out how the Applicant has taken into account consented and proposed developments within the vicinity of the Project (including nationally significant and regionally important schemes such as Net Zero Teesside and sustainable aviation fuel projects) as part of a robust cumulative effects assessment.
- 1.55 In addition to all of the above, the ES should assess the cumulative and in-combination effects of the Project alongside other existing, consented and proposed infrastructure developments within the Teesside cluster.
- 1.56 In particular, the ES should:
- 1.56.1 Consider the capacity and spatial constraints of existing infrastructure corridors
 - 1.56.2 Assess the implications of multiple projects seeking to utilise the same corridors

- 1.56.3 Evaluate whether the Project has been designed in a manner that supports the efficient use of shared infrastructure
- 1.57 The ES should demonstrate how the Applicant has considered coordination with other developers, including
 - 1.57.1 Opportunities for shared infrastructure
 - 1.57.2 Design approaches that maximise current and future corridor capacity
- 1.58 The ES should also consider whether alternative design solutions (e.g. infrastructure sharing or different configurations) could reduce cumulative constraints and enable greater overall public benefit.
- 1.59 The ES should assess the risk of uncoordinated (siloed) infrastructure development within constrained industrial corridors.
- 1.60 This should include consideration of whether the Project could:
 - 1.60.1 Reduce overall infrastructure capacity
 - 1.60.2 Preclude more efficient future solutions (e.g. shared pipe racks or integrated corridors)
 - 1.60.3 Constrain delivery of other nationally significant infrastructure projects
- 1.61 The ES should describe how the Project has been developed having regard to long-term strategic infrastructure planning within the cluster, rather than as a standalone development.

Existing Pipeline Infrastructure

- 1.62 Sembcorp seeks to protect and maintain its pipeline corridor. As outlined above, the pipeline corridor is fundamental in serving an array of businesses and customers both on Teesside and nationally.
- 1.63 Sembcorp is concerned that without appropriate management controls the Project may cause significant disruption to the efficient and safe use Sembcorp Pipeline Corridor.
- 1.64 Sembcorp has exercised control over the pipeline corridor for its own benefit and the collective benefit of all users since 2003 in a way to maintain and promote its safe, effective and integrated operation. In exercising such controlled operations, Sembcorp has been successful in regulating the interplay with plant operators and the exchange of materials through its pipeline corridor and has consequently maximised its own financial benefit and that of the wider Teesside cluster. Any disruption would most likely compromise these financial benefits.
- 1.65 In addition, any disruption may have significant health and safety implications since some facilities within the Wilton complex are on the register maintained by the Health and Safety Executive (HSE) under the COMAH Regulations.
- 1.66 If the Applicant seeks compulsory acquisition or extinguishment of rights within the operational area of the integrated Sembcorp Pipeline Corridor, the potential for the timing of acquisition and development and for the interference with access, operations and other upgrade proposals could be significantly detrimental to the continuing safe and economic operation of plant within the corridor - both that of individual operators at Wilton and those operators within the wider cluster served by the

Corridor. Furthermore, the acquisition of new rights (and potential interference with existing rights) may be of significant detriment to any future development proposals by Sembcorp, third parties or other nationally significant projects.

Coordination and capacity

- 1.67 Sembcorp is now in contact with several parties seeking to promote nationally significant infrastructure as well as important Tees Valley developments on both sides of the Tees
- 1.68 To varying degrees, these projects wish to utilise the Sembcorp pipeline corridor. Whilst Sembcorp seeks to work collaboratively with all developers, it is concerned that those promoting these projects should coordinate and collaborate with each other in relation to their infrastructure requirements. In particular, because of the complex and heavily developed areas through which the Sembcorp pipeline corridor navigates. It is constrained and has a finite capacity and, as currently designed, it is unlikely to accommodate all of the infrastructure required to enable the above mentioned projects.
- 1.69 In order to make the most efficient use of the available space, Sembcorp considers that all developers wishing to install new apparatus and infrastructure in the pipeline corridor should;
- 1.69.1 explore the possibilities for sharing such infrastructure; and
 - 1.69.2 Consider design solutions which facilitate the most efficient use of space and maximise the current capacity and provide for future capacity of the pipeline corridor.
- 1.70 If each developer operates in a silo then the ultimate capacity of the pipeline corridor may be unnecessarily constrained and other NSIP infrastructure obstructed. For example, the continued addition of pipelines to the corridor is likely to make it exceptionally difficult and uneconomic to add a pipe rack to the corridor, which could significantly increase its capacity, thereby unlocking other projects and achieving greater public benefits. Design solutions which allow one NSIP project to proceed to the detriment of others must be avoided.

Access roads

- 1.71 Any proposed use or works to any access roads will need to be carefully considered and any impacts on Sembcorp's operations avoided/mitigated. Where any rights relate to private roads, there are potential cost implications associated with security, asset protection, damage, wear and tear, all of which will need to be addressed by the applicant.
- 1.72 The ES should identify all proposed use of existing access infrastructure, including private roads serving industrial operations.
- 1.73 The assessment should include:
- 1.73.1 Impacts on ongoing operations and logistics
 - 1.73.2 Effects of construction traffic, access restrictions, and works
 - 1.73.3 Potential for damage, wear and tear, and security implications
- 1.74 The ES should set out appropriate mitigation measures, including access management, reinstatement and protection of sensitive infrastructure.

PROTECTION AND FURTHER CONSULTATION

- 1.75 On the basis of the information currently available:
- 1.75.1 Sembcorp requires further information in relation to the plots identified. Once this is provided, Sembcorp may provide additional consultation responses to help guide the Applicant's proposals.
 - 1.75.2 Sembcorp would encourage the Applicant to engage with it as early as possible in relation to any private treaty acquisitions that it may decide to pursue.
 - 1.75.3 Sembcorp proposes to work with the Applicant to agree suitable protective provisions.
 - 1.75.4 Sembcorp would welcome some discussions regarding the redline boundary that has been submitted without prior consultation.
- 1.76 It is acknowledged that discussions with the Applicant are ongoing, and it is hoped that it will seek to acquire the necessary interests in the pipeline corridor by private treaty negotiation.
- 1.77 On the basis of the information currently available, further detail is required within the ES to enable a full understanding of the Project's interaction with existing infrastructure and land interests.
- 1.78 The ES should therefore include sufficient granularity of detail design, land referencing and infrastructure mapping to enable both meaningful engagement with affected parties and assessment of potential effects.
- 1.79 Sembcorp would welcome continued engagement with the Applicant to support the development of a robust assessment and appropriate mitigation measures, including the development of protective provisions.

Conclusion

- 1.80 Sembcorp provisionally supports the strategic objectives of the Project subject to receiving further detail, but Sembcorp also emphasises the importance of ensuring that the ES robustly assesses:
- 1.80.1 Interactions with existing infrastructure
 - 1.80.2 Impacts on industrial operations
 - 1.80.3 Safety and regulatory considerations
 - 1.80.4 Cumulative and capacity-related effects
- 1.81 A comprehensive and coordinated approach will be essential to ensure that the Project can be delivered alongside other infrastructure in a manner that supports the continued safe and efficient operation of the Teesside industrial cluster.

Yours faithfully

Sembcorp Energy UK Limited

From: Sphere Enquiries <enquiries@sphere-connections.co.uk>

Sent: 29 May 2026 13:08

To: East Coast Hydrogen Pipeline – Teesside
<eastcoasthydrogenteesside@planninginspectorate.gov.uk>

Subject: Re: EN0710010 - East Coast Hydrogen Teesside Pipeline - EIA Scoping and Consultation and Regulation 11 Notification

Hi [REDACTED]

Thank you for taking the time to share these details with us.

I can confirm that Sphere Energy Connect has no assets in the vicinity of these works and have no comments to make at this time. We are a new IDNO business just entering the market and still completing Regulatory processes in order for us to operate an asset base within the UK.

Good luck with the project.

Thanks

[REDACTED]



[REDACTED] | Head of Asset Management &
Operations | Sphere Energy Connect

E: [REDACTED]@[sphere-connections.co.uk](mailto:enquiries@sphere-connections.co.uk) | M: [REDACTED]

From: Parish Clerk <clerk@stillingtonandwhitton-pc.gov.uk>

Sent: 15 June 2026 14:08

To: East Coast Hydrogen Pipeline – Teesside
<eastcoasthydrogenteesside@planninginspectorate.gov.uk>

Subject: Re:EN0710010 - East Coast Hydrogen Teesside Pipeline - EIA Scoping and Consultation and Regulation 11 Notification

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

Hello

Stillington and Whitton Parish Council do not have any comments to make about the Environmental Statement. The Parish Council would like to continue to remain a consultation body and receive more information about this project as it develops. Thank you

Kind regards



Parish Clerk
Stillington and Whitton Parish Council

NUMBER OF REPRESENTATION	HAVE PD RIGHTS BEEN REMOVED

26/01186/ENQ

DEVELOPMENT CONTROL SECTION

RECORD OF DECISION MADE UNDER DELEGATED POWERS

Proposal

Consultation in relation to EIA Scoping Opinion - East Coast Hydrogen Teesside Pipeline

Location

East Coast Hydrogen Teesside Pipeline

Validated

29 May 26.

Delegation Scheme

2.21

Confidential Matter?

Yes, response to a pre-application enquiry.

Case Officer

Development Management

Signature

Dev Management

1 June 26

Target Date

8 June 26

DCLG Code

No DOE required

Nature of Decision Made	Response
<p>Authorising Officer</p> <p>TS / DPE / ABR / DRO Signature</p>	<div style="background-color: black; width: 100px; height: 40px; margin: 0 auto;"></div> <p style="text-align: right;">Date 03.06.26</p>

Constraints

N/A: site lies to the south of the City.

Policies

N/A: site lies to the south of the City.

Type of publicity

None undertaken.

Consultees

None undertaken.

Neighbour Consultations

None undertaken.

Reason for decision

The notification relates to a request for a scoping opinion, submitted by Northern Gas Networks to the Planning Inspectorate for a Nationally Significant Infrastructure Project, for a proposed hydrogen pipeline between Teesside and Newton Aycliffe.

The summary of the proposed development, as shown on the website of the Planning Inspectorate, will be repeated below.

“The Project will convey hydrogen from production and storage locations proposed by third-parties in the North East Region to a range of industrial consumers across Teesside and County Durham, including potential connections to other third party operated networks. The Project consists of the construction (including repurposing) and operation of an approximately 63km underground high and intermediate pressure hydrogen pipeline between Teesside and Newton Aycliffe. 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.”

The submitted Scoping Report includes a location plan of the proposed development, which shows that the northern most part would be to the south of Hartlepool and just to the south of Seaton Carew.

Given the separation distance from the City and the commitment of the Applicant to prepare an Environmental Statement, there aren't any observations.

Decision

No observations.

Equality Act 2010 - 149 Public Sector Equality Duty

During the detailed consideration of this application/proposal an equality impact assessment has been undertaken which demonstrates that due regard has been given to the duties placed on the LPA's as required by the aforementioned Act.

As part of the assessment of the application/proposal due regard has been given to the following relevant protected characteristics:-

- o age;
- o disability;

- o gender reassignment;
- o pregnancy and maternity;
- o race;
- o religion or belief;
- o sex;
- o sexual orientation.

The LPA is committed to (a) eliminating discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act 2010; (b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it; (c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

In addition, the LPA, in the assessment of this application/proposal has given due regard to the need to advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it. This approach involves (a) removing or minimising disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic; (b) take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it; (c) encourage persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low.

The LPA has taken reasonable and proportionate steps to meet the needs of disabled persons that are different from the needs of persons who are not disabled include, in particular, steps to take account of disabled persons' disabilities, as part of this planning application/proposal.

Due regard has been given to the need to foster good relations between persons who share a relevant protected characteristic and persons who do not share it involves. Particular consideration has been given to the need to:

- (a) tackle prejudice, and
- (b) promote understanding.

Finally, the LPA recognise that compliance with the duties in this section may involve treating some persons more favourably than others; but that is not to be taken as permitting conduct that would otherwise be prohibited by or under this Act.

END OF DOCUMENT



**Canal &
River Trust**

Making life better by water

Your Ref EN0710010

Our Ref CRTR-IPP-01009-01

Monday 1 June 2026

Proposal: Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (The EIA Regulations) – Regulations 10 and 11 Scoping Consultation and Notification

Project Name: East Coast Hydrogen Teesside Pipeline

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 are Navigation Authority for the River Tees upstream of the Tees Barrage at Stockton. The proposed works boundary, therefore, do not cross land operated by the Trust.

We therefore **have no comment to make** upon the development proposals as they currently stand.

We hope the above is of use. Please do not hesitate to contact me with any queries you may have.

Yours sincerely,

██████████ MRTPI
Area Planner

██████████@canalrivertrust.org.uk
██████████

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

Canal & River Trust Spatial Planning Team

E: planning@canalrivertrust.org.uk W: canalrivertrust.org.uk T: 0303 040 4040



Planning Inspectorate

Our ref: OR-0005425/01

Email:

Your ref: EN0710010

eastcoasthydrogenteesside@planninginspectorate.gov.uk

Date: 25 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 Teesside Pipeline (the proposed development) Scoping consultation

Thank you for consulting us on the above Scoping Consultation which was received on 29 May 2026.

The Environment Agency has reviewed the East Coast Hydrogen Teesside Pipeline *Environmental Impact Assessment Scoping Report (Volume I Main text) & (Volume II – Figures)* for the above scheme, Dated: 28 May 2026.

We have the following comments to make regarding the proposed scope of the Environmental Statement (ES).

For the topics within our remit, we broadly agree with the topics that have been scoped in. We further recommend inclusion of the following detailed advice that we have addressed in Appendix A in issue/impact/solution format.

Final comments

Should you require any additional information, or wish to discuss these matters further, please do not hesitate to contact me on the details below.

Yours sincerely

██████████ (MRTPI)
Planning Specialist

Direct dial ██████████
Direct e-mail ██████████@environment-agency.gov.uk

Appendix A – Detailed comments

Flood Risk & Modelling

Document Reference(s) EIA scoping report: Section 8.16 Water resources and flood risk. Climate change with respect to flood risk.	
Issue	The applicant has scoped flood risk due to changes in floodplain capacity and drainage into the construction and operation phase of the development however there has been no reference to the impact the development may have on flood defences and their level of protection.
Impact	Flood defences may become damaged and risk of a breach event occurring may increase.
Solution	The applicant should scope in an assessment of how the proposed construction and operational phase may impact flood defences and ensure necessary mitigation is incorporated in to plans.

Document Reference(s) EIA scoping report: Section 8.16 Water resources and flood risk. Climate change with respect to flood risk.	
Issue	The applicant will need to place infrastructure underneath watercourses. For all crossings below main rivers the Environment Agency would recommend the method of installation to be Horizontal Directional Drilling (HDD) or Microtunneling.
Impact	The use of these methods will minimise disruption to the watercourse and floodplain flow routes.
Solution	The applicant should commit to using these methods and if this is not possible should provide justification for why other methods are necessary and provide evidence appropriate mitigation has been provided.

Document Reference(s) EIA scoping report: Section 8.16 Water resources and flood risk. Climate change with respect to flood risk. Page 235	
Issue	Climate change allowances to be applied in the context of flood risk are not clear at this stage
Impact	The assessment of future baseline and with scheme conditions could be inappropriate
Solution	Please ensure development lifetime and vulnerability classification is taken into consideration when applying climate change allowances in the context of flood risk. For further details please see Flood risk assessments: climate change allowances - GOV.UK

Additional narrative/ explanation (if necessary)

This section notes that future climate change will increase the likelihood of extreme storm events. The allowances that will need to be applied are determined by the location, the Flood Zone the development is in, and the vulnerability classification of the proposed development. It should be noted that the lifetime of the proposed development is also important here. Noting the 50-year design life of the pipelines and the potential for this to be extended further through monitoring and maintenance, from a fluvial flood risk perspective this would put the development within the 2080s epoch (2070 to 2125). Additionally, as the development would likely be classed as “Essential Infrastructure”, a Higher Central allowance for climate change as well as a Credible Maximum scenario to demonstrate the resilience of the development should be considered.

Document Reference(s) EIA scoping report: Section 8.16 Water resources and flood risk. Watercourse Crossings. Page 239

Issue	Flood risk could be increased if crossings are not appropriately designed. These should be clear span, and no culverting should occur on main rivers.
Impact	Flood risk could be increased elsewhere
Solution	Please ensure infrastructure such as crossings within watercourses, and any channel diversions are appropriately designed to remain operational during times of flooding and not increase flood risk elsewhere

Additional narrative/ explanation (if necessary)

This section describes how watercourse crossings will be minimised where possible and that any permanent watercourse diversions or crossings will be designed to assist in the continuity of conveyance and floodplain utilisation such that there is no residual significant detrimental impact on the wider catchment. This is welcomed.

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 and how the impacts of any channel diversions are represented. Typically, this would be determined by undertaking hydraulic modelling or referring to existing detailed hydraulic modelling data (where available and suitable). Any

proposed crossings or diversions should be designed such that they do not increase flood risk elsewhere

Document Reference(s) EIA scoping report: Section 8.16 Water resources and flood risk. Floodplain compensation. Page 239

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 (if necessary)

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. Within the final Flood Risk Assessment (FRA), the applicant must demonstrate how the proposed development is compliant with policy. 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) EIA scoping report: Section 8.16 Water resources and flood risk. Flood Risk Assessment. Page 246

Issue	Use of existing flood risk datasets
Impact	The assessment of flood risk could be inaccurate
Solution	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 . Please ensure any data used provides a reasonable assessment of current and future baseline conditions.

Additional narrative/ explanation (if necessary)

This section states that flood risk will be assessed using existing data and information requested from the Environment Agency. A preliminary Flood Risk Assessment will be undertaken to qualitatively identify flood risks from all sources. Where the preliminary Flood Risk Assessment identified the potential for flood risk impacts, a more detailed FRA may be undertaken using hydraulic calculations or models to be agreed with the Environment Agency. This is welcomed.

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. 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](#). For information regarding climate change allowances to use for Essential Infrastructure projects please refer to: [Flood risk assessments: climate change allowances - 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.

Water Quality

Document Reference(s) EIA scoping report: 4.2.22	
Issue	Provision of space for fire water storage within the drainage has not been included
Impact	Firefighting waters could be detrimental to watercourses and to groundwater and could lead to the pollution of controlled waters if not properly managed.
Solution	There should be appropriate consideration for the space and design of drainage system to incorporate fire water. The drainage systems should 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.
Additional narrative/ explanation (if necessary)	

Document Reference(s) EIA scoping report: 4.5.5	
Issue	The description of how the working corridor will be established does not include installation of temporary drainage and silt fencing. There is also no mention of temporary drainage within the list of particulars allowed for in the working corridor.
Impact	If temporary drainage is not set up when the site is cleared and vegetation is stripped, there is a risk of silt laden water being discharged to nearby watercourses and possible discharge of contaminated water to controlled waters. This could result in a pollution incident.
Solution	Site establishment planning should include temporary drainage and silt management in your site establishment.
Additional narrative/ explanation (if necessary)	

Document Reference(s) EIA scoping report: 4.5.8	
Issue	It is not stated 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	Effective planning of where potential discharges of sewage effluent could be required, If the discharge is not to sewer, then a sewage treatment plant and

	permit may be required before any discharge can take place. The space required for the treatment system and discharge route should be considered.
Additional narrative/ explanation (if necessary)	

Permitting

Document Reference(s) EIA scoping report: 8.16 Potential impacts pp. 237	
Issue	It stated “ <i>reductions in water quality and aquatic habitat quality of surface water bodies as a result of localised dewatering, sediment release and disturbance from the construction</i> ” assessments of the quality of any discharges and there is no mention of the possible requirement for a EPR permit
Impact	An insufficient assessment of the discharge of construction site drainage may lead to silty/contaminated rainwater causing 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	The applicant should consider whether a permit application for discharge of construction site drainage is required.
Additional narrative/ explanation (if necessary)	

Water Quality Monitoring

Document Reference(s) EIA scoping report: 8.16 Baseline conditions and surveys pp.244	
Issue	A ‘baseline water environment walk-over survey will be carried out’. However, there is insufficient information regarding water quality monitoring.
Impact	If water quality monitoring is not included then a suitable baseline of water quality data may not be captured, and any trends in water quality deterioration or improvement as a result of the project may not be understood.
Solution	A water quality monitoring plan should be provided when the Environmental Statement is produced. This should clarify locations, frequency, quantity and possible methods of monitoring. There should be pre-construction, during construction and post-construction phases of water quality monitoring.
Additional narrative/ explanation (if necessary)	

Groundwater & Contaminated Land

Document Reference(s): Scoping Report Section 3	
Issue	The Section sets out environmental constraints but 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.
Additional narrative/ explanation (if necessary)	

Document Reference(s): Scoping Report Section 4	
Issue	The list of assessments and management plans that will be included in the DCO application is not complete. We acknowledge that the Scheme is at the early design stage.
Impact	Risks to controlled waters from activities that are not controlled by suitable management plans.
Solution	Ensure the Environmental Statement is supported by a full suite of outline management plans. See detail below.
Additional narrative/ explanation (if necessary)	
Consider including:	
<ul style="list-style-type: none">• Construction Surface Water Management Plan• Drainage Strategy – including pollution prevention measures• Outline Construction Environmental Management Plan• Outline Operational Environmental Management Plan• Outline Decommissioning Environmental Management Plan• Foundation Works Risk Assessment	

Document Reference(s): Scoping Report Section 4.2	
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 (if necessary)

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.

Document Reference(s): Scoping Report Section 4.2

Issue	The Applicant proposes to employ trenchless crossing methods to cross sensitive features and infrastructure, including beneath the River Tees and Greatham Creek.
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.
Solution	The Applicant should 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 receptor. The Applicant should also produce a drilling fluid breakout plan to mitigate risks associated with drilling fluids. These should be secured under the CEMP and informed by ground investigation data.

Additional narrative/ explanation (if necessary)

The scoping report indicates that, where suitable alternatives exist, drilling fluids containing substances hazardous to groundwater will be avoided. However, the use of drilling fluids containing hazardous substances to groundwater would not be acceptable under any circumstances. The Environment Agency would not permit hazardous substances to enter the groundwater in accordance with *The Environment Agency's approach to groundwater protection* (February 2018, Version 1.2) – particularly within principal aquifers and SPZs.

The applicant should specify any drilling fluids, lubricants and additives required and be aware that any discharge of this nature will also require an environment permit.

Document Reference(s): Scoping Report Table 4.1	
Issue	The Applicant seeks to minimise interaction between the Proposed Development and Source Protection Zones 1, 2 and 3.
Impact	Potential for avoidable significant effects to potable water supply abstractions.
Solution	The Applicant should commit to the avoidance of SPZ1 and SPZ2 where reasonably practicable, or to minimise interaction between the Proposed Development and these areas where unavoidable.
Additional narrative/ explanation (if necessary)	
<p>The Applicant should wherever practicable also avoid siting Above Ground Installations (AGIs), Block Valve Stations (BVS) and temporary construction compounds within SPZ1 to minimise the risks to the associated potable abstractions.</p> <p>Private water supplies have not been identified yet. Note that any abstraction for potable use has a default 50m SPZ1.</p>	

Document Reference(s): Scoping Report Section 8.7.1	
Issue	The report is inconsistent when summarising the aquifer status of the Study Area.
Impact	Potential for confusion to the reader.
Solution	The Applicant should ensure it is clear which aquifer classifications apply to the bedrock and superficial deposits respectively.
Additional narrative/ explanation (if necessary)	

Document Reference(s): Section 8.16	
Issue	In the vicinity of Newton Aycliffe public water supply abstraction, including the surrounding public water supply abstractions, shallow groundwater levels are recorded at approximately 0.5-1.0 m below ground level.
Impact	Altering of groundwater flow pathways or reduction in groundwater availability
Solution	The proposed development must ensure that construction and operational activities do not alter groundwater flow pathways or reduce groundwater availability to these abstractions or water-dependant features
Additional narrative/ explanation (if necessary)	

Document Reference(s): Scoping Report Section 8.7, Section 8.11

Issue	<p>The Applicant reports several authorised and historic landfill sites within the Study Area as a potential source of contamination. Details of the wastes received at these sites and any containment systems are not provided. Although this is sufficient information at Scoping stage we would expect to see detailed consideration of each landfill identified within the Study Area at later stages of the Development Consent Order process.</p> <p>Section 8.11 '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.</p>
Impact	<p>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.</p>
Solution	<p>The applicant should further assess all identified active and historic landfill sites in subsequent stages of the application process. In particular, the applicant should consider whether the Proposed Development has the potential to damage the integrity of existing landfills and/or encounter historic contamination or wastes associated with these features. For example, this could occur via open trenches through the landfill or drilling at an insufficient depth beneath the landfill.</p> <p>The applicant should avoid damaging landfill infrastructure. If this is unavoidable, they should ensure that new monitoring infrastructure such as perimeter monitoring wells are installed before the existing infrastructure is damaged or removed. Any repairs to infrastructure must be done under CQA. The applicant should also note that any material excavated from a landfill cannot be replaced in-situ. It must be handled as waste and would need to be disposed appropriately off-site. An informative about closed landfill sites is provided at the end of this response.</p> <p>Produce a waste management plan that sets out how waste material will be handled. This should be supported by a hydrogeological risk assessment.</p> <p>Ensure that all necessary permits are applied for at an early stage. Discuss the proposed works with the National Permitting Service as early as possible.</p>

Additional narrative/ explanation (if necessary)

Advice to applicant

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 resident's 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 8.7.1

Issue	The Proposed Development will cut across the permitted Wilton Perimeter Mounds (ICI Chemicals & Polymers Ltd), Bran Sands (Anglo American) and Cowpen Bewley (Highfield Environmental) landfills. It is not clear from the submitted documents how the pipeline will interact with the landfills.
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 landfills and provide details of proposed mitigation measures to minimise risk to groundwater quality from these works.
Additional narrative/ explanation (if necessary)	
The Proposed Development should not compromise any engineered controls at new and historic landfills unless this is unavoidable.	

Document Reference(s): Scoping Report Section 8.7	
Issue	Procedures for managing unexpected contamination encountered during and beyond the construction are stated to be established in the final 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 dialogue / commentary:	
Our suggested process is:	
<ol style="list-style-type: none"> 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): Scoping Report Section 8.15

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 (if necessary)

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—

- d. *substance,*
- e. *heat, or*
- f. *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.

The EA currently has 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): Scoping Report Section 8.15, page 249	
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, GWDTEs (Groundwater Dependant Terrestrial Ecosystem) and Drinking Water Groundwater Safeguard Zones.
Additional narrative/ explanation (if necessary)	
The report states that “As the Scoping Boundary passes through areas of Principal Aquifer (which is associated with high groundwater vulnerability) review of any existing GI would be undertaken to assess the potential for groundwater flooding, or otherwise new investigations may be required.”	

Document Reference(s): Scoping Report Section 8.15 p237	
Issue	The report lists potential impacts from construction dewatering activities. However the list does not include effects on designated and potential 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 (if necessary)	
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): Scoping Report Figure 8.10	
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 ES.
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Additional narrative/ explanation (if necessary)

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): Scoping Report section 8.7

Point for Consideration

Land Contamination and Permitted Sites at Seal Sands Industrial Estate

As identified in Section 8.7, there is a significant risk of land contamination associated with the former heavy industrial uses within the Seal Sands and Wilton Industrial Estates. Of particular concern, the scoping boundary intersects with the former Aurorium UK site (centred at NZ53692470), which has since been acquired by Green Earth Limited.

This site is currently non-operational but remains an actively permitted installation and is subject to ongoing inspection under the Part 2A regime. Historically, the site manufactured synthetic organic chemicals and has a documented history of pollution incidents during the 1980s and 1990s, including spillages and unauthorised chemical releases. Notably, a toluene spill in the northern manufacturing area resulted in free-phase contamination.

Any development and operational activities within or adjacent to this area should therefore consider the potential for residual contamination, including risks to controlled waters, and incorporate appropriate risk assessment and mitigation measures where required.

The scoping boundary also intersects a number of currently permitted installations, including SABIC UK Petrochemicals (Northern Aromatic), INEOS Nitriles UK Limited (Seal Sands) and BASF plc. These sites are currently progressing through the environmental permit surrender process. It should be noted that permit surrender only requires the operator to demonstrate that there has been no deterioration from baseline conditions and does not require remediation of historic contamination arising prior to the permitted activities. The applicant should therefore take account of these ongoing regulatory processes and associated timescales in the development and delivery of the proposed NSIP.

Furthermore, the Seal Sands and Wilton Industrial Estates are areas where emerging contaminants, including PFOS and PFOA (per- and polyfluoroalkyl substances), may be present within soils and groundwater. Consideration of these substances within the site assessment would therefore be expected.

Document Reference(s): Scoping Report Section 8.7

Point for Consideration:

Of the potential impacts scoped in for the construction phase, one is the 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 3.3.14

Point for Consideration:

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

Point for Consideration:

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

Point for Consideration:

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

Document Reference(s): Scoping Report

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.

Document Reference(s): Scoping Report

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 dewatering 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.

Document Reference(s): Scoping Report

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

Document Reference(s): Scoping Report

Informative: Waste to be taken off-site

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

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

Developers should ensure that all contaminated materials are adequately characterised both chemically and physically in line with British Standards BS EN 14899:2005 'Characterisation of Waste - Sampling of Waste Materials - Framework for the Preparation and Application of a Sampling Plan'. The permitting status of any proposed treatment or disposal activity should be clear. If in doubt, the Environment Agency should be contacted for advice at an early stage to avoid any delays.

If the total quantity of waste material to be produced at or taken off site is hazardous waste and is 500kg or greater in any 12-month period, the developer will need to register with us as a hazardous waste producer. Refer to [our website](#) for more information.

Document Reference(s): Scoping Report

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](#).

Water Resources

We broadly agree with the Water Resources elements which have been scoped into assessment regarding impacts to existing abstractions which include, water company supply (see also Groundwater section comments regarding Source Protection Zones), other licensed abstraction and private (unlicensed) water supplies.

Document Reference(s): Chapter	
Issue	<p>The Project does not document its own water resources impacts. Consumptive water demands have not been described by the report. These may include (but are not limited to):</p> <ul style="list-style-type: none">• Potable/domestic supply to welfare stations• Dust suppression• Wheel/machinery wash• Concrete batching• Drilling fluids (slurry) for HDD <p>Quantities of water required for HDD for the Tees crossing may be significant and should be planned for accordingly.</p>
Impact	<p>Water supply may not be available from different sources of supply or may be restricted or limited.</p> <ul style="list-style-type: none">• Water company supply needs to be confirmed by the undertaker;• Tankering should be reflected in traffic and transport estimates;• Groundwater may be closed to new abstraction; Surface water abstraction may be restricted to periods outside of low flows only <p>A review of the Abstraction licensing strategy has been undertaken but the impacts of restrictions upon the scheme's own water supply have not been appraised.</p>
Solution	<p>All demands of the project should be described by the Environmental statement and all intended options considered for supply should be appraised to identify any problems that detailed design will need to overcome before any permits are applied for.</p>
Additional narrative/ explanation (if necessary)	
<p>NPS EN-1 (Energy infrastructure) section 5.16.7 states:</p> <p>The Environmental statement should in particular describe existing water resources affected by the proposed project and the impacts of the proposed project on water resources, noting any relevant existing abstraction rates, proposed new abstraction rates and proposed changes to abstraction rates (including any impact on or use of mains supplies and reference to Abstraction Licensing Strategies) and also demonstrate how</p>	

proposals minimise the use of water resources and water consumption in the first instance.

The Environment Agency seeks confidence that a practical and sustainable source of water supply can be found to meet the consumptive demands of the full life of the project and that problems do not arise post consent which cause costly delays or compromise the viability of the scheme.

Biodiversity

Document Reference(s): East Coast Hydrogen Teesside Pipeline Environmental Impact Assessment (EIA) Scoping Report (Volume I Main Text): 4. The Proposed Development Section: 4.2.12	
Issue	The pipeline may need to cross an existing pipe bridge, to supply Hydrogen to an industrial customer. In-channel works will likely be required to upgrade the bridge (e.g. inspections or repairs via a support barge).
Impact	In-channel works has an increased risk of disturbing otters and their resting places during construction, which are offences under the Conservation of Habitats and Species Regulations 2017 (as amended). Disturbing otter's usual routes can force otters to use roads, which places them at a higher risk of injury or death.
Solution	Conduct pre-construction checks to determine the presence of otters or their resting places close to works. Ensure in-channel works are only completed during daylight hours. A European Protected Species Licence will be required if works are likely to cause a disturbance.
Additional narrative/ explanation (if necessary)	
Document Reference(s): East Coast Hydrogen Teesside Pipeline Environmental Impact Assessment (EIA) Scoping Report (Volume I Main Text): 4. The Proposed Development Section(s): 4.2.33	
Issue	The scheme is a linear project, involving the installation of pipelines and cables via trenching.
Impact	Compounds and trenches associated with cable and pipeline installation present a risk of entrapment of mammals such as otters.
Solution	Cover-over open trenches to prevent wildlife from falling in and place a ramp to enable wildlife to escape. Securely fence compounds and trenches during construction. Cap off any open pipes overnight, to prevent animals from accessing the pipes.
Additional narrative/ explanation (if necessary)	

<p>Document Reference(s): East Coast Hydrogen Teesside Pipeline Environmental Impact Assessment (EIA) Scoping Report (Volume I Main Text): 4. The Proposed Development</p> <p>Section(s): 4.5.11</p>	
Issue	<p>Open-cut techniques will be used as part of pipeline installation, to create trenches for pipes and cables. Given the route is not yet finalised, it is difficult to ascertain the number of open-cut crossings that may be required and also the number and nature of access track crossings, i.e. whether the intention is to culvert or primarily use existing crossings for access to works.</p>
Impact	<p>Open-cut techniques for cable crossings destroy channel bedforms and can weaken banks. Culverting of watercourses can impede water conveyance and disrupt sediment pathways, through both culvert design and construction. Open cut methods for cabling or pipelines can also destroy habitats, including those of protected species such as the water vole. Installation of cables or pipelines can also prevent free movement of mammals along the river corridor. Compounds and trenches associated with installation present a risk of entrapment of mammals such as otter and therefore will need to be securely fenced.</p>
Solution	<p>Avoid and/or reduce the number of open-cut cable crossings via careful route design. If open-cut techniques are required, ensure that pre-excitation survey is completed, to ensure that geological layers are not disturbed too much and that the channel substrate is restored using material excavated, or that of similar geology/grain size if sediment is found to be contaminated and has to be removed from site.</p> <p>Reduce number of watercourse access crossings through careful route design and use of existing access crossings where possible. If new access crossings are required, the use of open span bridging structures is encouraged. A hierarchy of open span, portal/arched/open-bottom culverts and then box/pipe culverts should be followed when choosing crossing locations. For temporary (see note) access crossings consider using Bailey-type bridges that rest on banks and do not need intrusive works to install. Culverts, especially pipe culverts, should be a last resort. Please note that the EA has a general policy against the use of culverts on main rivers due to possible deterioration in WFD status of said waterbodies. If existing crossings need to be upgraded for access, consider upgrading the crossing to next level in hierarchy.</p> <p>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.</p> <p>See below for some general considerations on crossings, WFD and water course sensitivity.</p>

NB: under our [EA] internal WER/WFD guidance temporary works are those activities that last less than 6-months, or where the effects of works last less than 6-months, and therefore can be considered to be low risk.

Additional narrative/ explanation (if necessary)

General considerations

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

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

Notes:

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

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

- Any potential construction, operational, and decommissioning phase impacts that the proposed scheme may have on the river must be subject to a WFD Assessment to the satisfaction of the EA.
- Any infrastructural developments on river/floodplain environments should be designed and delivered to have a minimal impact on natural river dynamics (e.g. erosion, deposition, meander migration etc.) and should not place any significant limitations on future river restoration projects.
- Geomorphologically dynamic behaviour is deemed likely to intensify in the next decades in line with Flood Estimation Handbook (Flood Estimation Handbook (FEH) | UK Centre for Ecology & Hydrology (ceh.ac.uk). Therefore, any infrastructure developments should also take some account of the likelihood for increased lateral and vertical river dynamics anticipated to result from continued hydro-climatic intensification (e.g. 'a flood-rich epoch') over the remainder of the 21st century (i.e., future proofed designs that are not just based on present-day baseline geomorphological configuration/behaviour).
- If river crossings (bridges, culverts, and buried cables) are required as part of the development, we [EA] would expect to see geomorphologically robust designs that will cause minimal impacts on natural fluvial processes operating in the river/floodplain environment over the course of the 21st century.

Further guidance 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

Water course sensitivity

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

Sensitivity to change cannot be determined from a desk study alone.

When determining the sensitivity of a watercourse, the applicant should ensure that professional judgement and the results of any surveys are also incorporated into the assessment.

Document Reference(s): East Coast Hydrogen Teesside Pipeline Environmental Impact Assessment (EIA) Scoping Report (Volume I Main Text): 4. The Proposed Development	
Section: 4.6.1	
Issue	Construction is estimated to take around 4 years to complete in full, yet there appears to be no mention of repeat surveys prior to construction. CIEEM's Advice Note 'On the lifespan of ecological reports & surveys' states that species survey data may be out of date around 12-18 months following a survey.
Impact	Changes in the baseline of species presence and distribution. For example, otters are highly transitory species, therefore an otter could construct a holt prior to or during construction. This may result damage or destruction of holts or disturbance during construction.
Solution	Pre-construction checks/surveys should be conducted prior to construction, to determine any changes in presence or distribution of species. Pre-construction checks should especially be undertaken at watercourse crossing points, even if no places of shelter (e.g. otter holts or water vole burrows) have been found.
Additional narrative/ explanation (if necessary)	
The development should also consider potential enhancement opportunities within the design. For example, potential enhancement may include habitat improvements or enhancing connectivity of the riverine corridor through the development.	

Document Reference(s): East Coast Hydrogen Teesside Pipeline Environmental Impact Assessment (EIA) Scoping Report (Volume I Main Text): 8.3 Biodiversity and Ecology	
Section: 'Embedded Measures'	
Issue	The 'Embedded Measures' Section does not mention the embedding of biosecurity measures, or an INNS Management Plan.
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.

Additional narrative/ explanation (if necessary)

Document Reference(s): East Coast Hydrogen Teesside Pipeline Environmental Impact Assessment (EIA) Scoping Report (Volume I Main Text): 8.16 Water Resources and Flood Risk

Section: 'Embedded Measures'

Issue	The 'Embedded Measures' states that any infrastructure within watercourses (such as culverting) will be designed to reduce flow conveyance and flood risk. Culverts should also be designed with protected species in mind.
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.

Additional narrative/ explanation (if necessary)

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

Fisheries

Section	EIA Scoping Report
Issue	Impacts to fish and aquatic species.
Impact	If impacts to 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 WFD status.
Solution	Fish and aquatic ecology should be scoped into the EIA. Baseline data should be obtained through a desk study (including EA fish population data) and field surveys. Impact-pathways should be identified and assessed in the EIA, which should include (but not limited to): <ul style="list-style-type: none">• impacts from noise and vibration associated with construction, particularly during the proposed crossing of the River Tees, Skelton Beck, River Skerne and Greatham Creek.

	<ul style="list-style-type: none"> • impacts from pollution and increased sedimentation • impacts from open cut crossing of watercourses and potential loss or damage to habitat • Impacts from light pollution on watercourses and aquatic ecology
Additional information	<p>Environment Agency fish survey data can be found at EA Ecology & Fish Data Explorer</p> <p>Suitable buffers should be in place for the entry and exit pits when HDD is used to ensure associated noise and vibration impacts on fish are minimised.</p>

Section	EIA Scoping Report – 8.10 Marine biodiversity - Fish
Issue	Sea lamprey and European eel not mentioned under migratory fish species utilising the River Tees.
Impact	Impact-pathways to these receptors may not be included in the EIA.
Solution	Include sea lamprey (<i>Petromyzon marinus</i>) and European eel (<i>Anguilla anguilla</i>) in the baseline for the River Tees.
Additional information	

Section	EIA Scoping Report – 8.10 Marine biodiversity - Fish
Issue	Incomplete description of Atlantic salmon utilisation of the River Tees.
Impact	Impact-pathways to this receptor may not be included in the EIA.
Solution	<p>Adult Atlantic salmon will likely be present in the estuary of the River Tees from as early as the beginning of June, particularly the multi-sea winter fish. They will wait in the estuary until conditions in the river are suitable for them to migrate into freshwater. In addition, salmon smolts will be present in the estuary from March to May as they migrate from the freshwater to the marine environment.</p> <p>These timings of fish presence in the River Tees should be included in the EIA, particularly as the pipeline is proposed to cross the tidal River Tees. Any impacts from the proposal should be assessed in the context of the current baseline, i.e. other impacts in the estuary, such as water quality and noise.</p>

Section	EIA Scoping Report – 8.10 Marine biodiversity - Fish
Issue	Incomplete description of sea trout and European eel utilisation of the River Tees and Greatham Creek
Impact	Impact-pathways to this receptor may not be included in the EIA.
Solution	<p>Sea trout are likely to spend a large portion of the marine life in the River Tees estuary as well as the Greatham Creek, where they will feed on marine organisms.</p> <p>In addition, there will be a presence of European eel of all life stages in both the Greatham Creek and tidal River Tees all year round. European eel migrate into the River Tees as elvers and migrate from the River Tees as silver eels. Adults may spend a large portion of their life cycle within the estuary.</p> <p>This utilisation must be included in the EIA, particularly as the pipeline is proposed to cross the tidal River Tees and Greatham Creek. Any impacts from the proposal must be assessed in the context of the current baseline, i.e. other impacts in the estuary, such as water quality and noise.</p>
Additional information	

Geomorphology

Document Reference(s): EAST COAST HYDROGEN TEESSIDE PIPELINE ENVIRONMENTAL IMPACT ASSESSMENT (EIA) SCOPING REPORT (VOLUME I MAIN TEXT)	
Issue	Decommissioning - the intention is to leave any underground infrastructure in situ following project end-of-life. However, no allowance has been made for the potential situation of pipeline exposure should watercourses change position laterally or vertically, nor for any effects of increased erosion at the coast due to climatic change driven sea-level rise.
Impact	Not acknowledging the potential for pipeline exposure after project end-of-life has the potential to damage the environment, including the water environment should climatic events lead to increased fluvial energy, incision of river channels and lateral movement of said channels across floodplains
Solution	Following the polluter pays principle, ensure that contingency plans are in place to manage consequences of potential pipeline (and associated underground infrastructure) exposure, either due to lateral and/or vertical channel movement (terrestrial/fluvial) or due to the effects of coastal erosion. This could include making the pipeline easier to decommission/retrieve/recycle at the design stage.

Additional narrative/ explanation (if necessary)

Whilst, due to the lowland nature of the majority of the cable route, it is unlikely that pipelines will become exposed by fluvial action, the possibility remains, especially where the pipeline crosses the Skelton Beck, as this is in an area of higher terrain leading to coastal cliffs. As does the potential for exposure due to coastal erosion, although this possibility is reduced even further by the intention to either use an existing tunnel or to HDD underneath the R. Tees at 10m below hard bed of tidal river.

Appendix B – Permitting/licensing requirements

A number of permits and licenses may be required to facilitate this scheme.

Should you wish to disapply any element of these proposals and bring within the scope of the Development Consent Order (DCO) details of this should be provided to the Environment Agency a minimum of 6 months prior to DCO submission.

We will require a consenting strategy document to be submitted in support of the proposals which outlines a programme of managing the various consents and permits, and confirmation of whether this will be subsumed within the DCO process or as standalone permits.

We recommend early engagement with our National Permitting Service (NPS) and full use of their enhanced pre-application advice service to ensure the permitting requirements and implications are fully understood and addressed in good time to inform the Planning Inspectorate (PINS) decision making process. Twin tracking is recommended for those applications considered fundamental to the DCO.

Please refer to PINS Annex D advice note for further information on how the Environment Agency's planning and permitting process can be best aligned within DCOs: Nationally Significant Infrastructure Projects - Advice on working with public bodies in the infrastructure planning process, Annex D: Environment Agency - GOV.UK.

Permitting pre-application advice: <https://www.gov.uk/guidance/get-advice-before-you-apply-for-an-environmental-permit>.



Maritime &
Coastguard
Agency

Maritime and Coastguard Agency
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105 Commercial Road
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SO15 1EG

www.gov.uk/mca

Your Ref: **EN0710010**

23rd June 2026

Via email: Eastcoasthydrogenteesside@planninginspectorate.gov.uk

Dear Planning Inspectorate,

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 Teesside Pipeline (the proposed development)

Thank you for your email dated 29th May 2026, inviting comments on the Scoping Report for the proposed East Coast Hydrogen Teesside Pipeline development. The Maritime and Coastguard Agency (MCA) has an interest in the works associated with the marine environment, and the potential impact on the safety of navigation, access to ports, harbours, and marinas, and any impact on our search and rescue obligations.

The Scoping Report has been considered by representatives of Marine Safety and PNT Services at the MCA, and would like to respond as follows:

The project involves the installation and commissioning of a new hydrogen pipeline connecting the multiple projects in the Teesside region and other network connections within the region. The works include (but are not limited to):

- construction (including repurposing), operation and maintenance of a hydrogen pipeline up to approximately 63km,
- The hydrogen pipelines will include High Pressure and Intermediate Pressure lines, varying from approximately 6 to 42 inches in diameter,
- Numerous Hydrogen Above-Ground Installations along the route of the pipeline.

We note that there are two proposed crossings of waterways, the Greatham Creek / Seaton on Tees Channel and the River Tees.

The River Tees crossing is expected to be undertaken either through an existing third-party tunnel or via a new crossing beneath the River Tees riverbed. The applicant's preferred option is to install the pipeline within the existing tunnel, at a minimum depth of 10 metres below the riverbed. Although this would be below the Mean High-Water Springs (MHWS) mark, no in-water works would be required. If use of the existing tunnel is not feasible, Horizontal Directional Drilling (HDD) or Microbore Tunnel (MBT) methods may be used instead.

These methods would also avoid in-water works, with activities taking place above MHWS, and would therefore not require a marine licence.

The Greatham Creek / Seaton on Tees Channel crossing is currently proposed either via an existing pipe bridge or through a new crossing beneath the riverbed of Greatham Creek. The applicant states that, if refurbishment works are required below the MHWS mark, a marine licence may be needed. If the existing pipe bridge is used, any refurbishment or upgrade works involving in-river activity would require a marine licence. Alternatively, a new trenchless crossing could be installed by boring through suitable strata at a minimum depth of 10 metres below the riverbed. As this option would not involve in-water works, it would not require a marine licence.

- 1) Based in the information provided in the Scoping Report, it is our understanding that there are no activities or construction works being undertaken below the Mean High Water Spring which could impact other marine users. Should this position change, the MCA would expect the impact on other marine users to be appropriately risk assessed, and we would expect to review the application and the proportionate navigation risk assessment at a later date. This should demonstrate that the risks associated with these works are reduced to As Low As Reasonably Practical (ALARP).
- 2) Once the applicant has confirmed the pipeline installation methods, the applicant should check that these works do not constitute a Marine Licensable activity where relevant. If a marine licence is not required, and there are no works undertaken below the Mean High Water Spring, which will impact the marine environment, the MCA would have no further comment on the EIA process.
- 3) In any case, the proposed sections of the River Tees fall within the jurisdiction of a Statutory Harbour Authority (SHA), namely PD Ports and Canals & Rivers Trust. As SHAs are responsible for maintaining the safety of navigation within their waters, the relevant SHA should therefore be consulted on any proposed works within their jurisdiction. The MCA encourages the applicant to consult with the relevant SHAs where appropriate to develop a robust Safety Management System (SMS) for the project, in accordance with the Ports and Marine Facilities Safety Code (PMSC) and its associated Guide to Good Practice, to ensure that risks and impacts on other marine users are reduced to As Low As Reasonably Practicable (ALARP).

The MCA is satisfied with the scoping report at this stage as the basis for an Environmental Impact Assessment and an Environmental Statement from the shipping and navigation based on the understanding that there are no works or activities which impact other marine users. The MCA would expect any changes to be reassessed as appropriate.

I hope you find this information useful at this Scoping Stage.

Yours sincerely,

██████████

██████████

Marine Licensing and Offshore Consenting Lead
Marine Safety and PNT Services

From: Customer Relations <customerrelations@nexus.org.uk>

Sent: 29 May 2026 12:03

To: East Coast Hydrogen Pipeline – Teesside

<eastcoasthydrogenteesside@planninginspectorate.gov.uk>

Subject: RE: EN0710010 - East Coast Hydrogen Teesside Pipeline - EIA Scoping and Consultation and Regulation 11 Notification CRM:03330003263

Thank you for your email.

Unfortunately, you have contacted our business in error, we are Nexus and operate the Tyne and Wear Metro trains in Newcastle Upon Tyne and have no connection to Teesside.

Sadly, I am unable to assist you with your enquiry on this occasion.

Regards

Nexus Customer Relations Team
Nexus Head Office
Floor 6
The Spark
Newcastle Helix
St James Boulevard
Newcastle upon Tyne
NE4 5DE

Tel: 0191 2020747

Email: customerrelations@nexus.org.uk

[Complaints Handling Procedure can be viewed by clicking here](#)



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: EN0710010
Our Ref: 95263CIRIS

██████████
Senior Environmental Advisor
Planning Inspectorate
c/o QUADIENT
69 Buckingham Avenue
Slough SL1 4PN

16 June 2026

Dear ██████████,

**Nationally Significant Infrastructure Project
East Coast Hydrogen Teesside Pipeline, EN0710010
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*¹, setting out aspects to be addressed within the Environmental Statement¹. This advice document and its recommendations are still valid and should be considered when preparing an ES. Please note that where impacts relating to health and/or further assessments are scoped out, promoters should fully explain and justify this within the submitted documentation.

Air Quality

Our position is that pollutants associated with road traffic or combustion, particularly particulate matter and oxides of nitrogen are non-threshold; i.e, an exposed population is likely to be subject to potential harm at any level and that reducing public exposure to non-threshold pollutants (such as particulate matter and nitrogen dioxide) below air quality standards will have potential public health benefits. We support approaches which minimise or mitigate public exposure to non-threshold air pollutants, address inequalities (in exposure) and maximise co-benefits (such as physical exercise). We encourage their consideration during development design, environmental and health impact assessment, and development consent.

EMF

It is noted that the current proposals do not appear to consider possible health impacts of Electric and Magnetic Fields (EMF)

UKHSA requests that the proposer confirms either that the project does not contain any EMF sources that may have a potential public health impact; or ensure that an appropriate assessment of the possible impact is included in the ES. For information on carrying out an assessment, please see the document entitled, *Advice on the content of Environmental Statements accompanying an application under the NSIP Regime*¹

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>

Yours sincerely,

On behalf of UK Health Security Agency

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

From: [REDACTED]@yorkshiredales.org.uk>

Sent: 01 June 2026 13:37

To: East Coast Hydrogen Pipeline – Teesside

<eastcoasthydrogenteesside@planninginspectorate.gov.uk>

Subject: EN0710010 - East Coast Hydrogen Teesside Pipeline - EIA Scoping and Consultation and Regulation 11 Notification

You don't often get email from [REDACTED]@yorkshiredales.org.uk. [Learn why this is important](#)

Dear [REDACTED]

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 further stages of this Application.

Yours sincerely

[REDACTED]



[REDACTED] RTPI
Principal Planner

[REDACTED]

www.yorkshiredales.org.uk



Yorkshire Dales National Park Authority
Yoredale | Bainbridge | Leyburn
North Yorkshire | DL8 3EL