

Date: 8 July 2026
PINS Ref: EN0710010
Our Ref: 17996

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Dear Sir/Madam

EN0710010 – EAST COAST HYDROGEN TEESSIDE PIPELINE (NORTHERN GAS NETWORKS)

We write on behalf of Net Zero North Sea Storage ('NZNSS'), in respect of Northern Gas Network's ('NGN' / the 'Applicant's') proposed development consent application for the East Coast Hydrogen Teesside Pipeline Project (the 'ECH Teesside Project'). NZNSS is an undertaker for the purposes of the development consent order granted in respect of the Net Zero Teesside Project.

NZNSS notes that NGN has submitted an application for an Environmental Impact Assessment ('EIA') scoping opinion in respect of the ECH Teesside Project to the Secretary of State for Energy Security and Net Zero. We have reviewed the EIA Scoping Report, notably Figure 1.2 (Rev P01) and Figure 1.3 (Rev P01) which show the Scoping Boundary, and Figure 4.1 which shows the Indicative Site Layout, and wish to make you aware of the interactions and overlaps of those with the confirmed Order limits for the Net Zero Teesside Project.

We have also written to NGN to advise them of the interactions between the projects.

The Net Zero Teesside Project ('Nzt')

NZNSS is named as an "undertaker" for the purposes of the Net Zero Teesside Order 2024 (the 'Nzt Order'). The Nzt Order came into force on 11 March 2024, and was the subject of a Non-Material Change via the Net Zero Teesside (Amendment) Order 2025 (which came into force on 29 October 2025). The Nzt Order (as amended) grants development consent for the Net Zero Teesside Project, including a gas-fired electricity generating station with carbon capture plant; gas, electricity grid and water connections; a water outfall pipe; a carbon dioxide gathering network; a high pressure carbon dioxide compression station; a high pressure carbon dioxide export pipeline; and associated and ancillary development.

A number of the elements of Nzt approved by the Nzt Order form part of the Northern Endurance Partnership ('NEP') Project. NZNSS will be developing the NEP Project, which encompasses the carbon dioxide gathering network, including pipeline connections from industrial facilities on Teesside to transport the captured carbon dioxide; the carbon dioxide compression station to receive the captured carbon dioxide from the gathering network; and the onshore and offshore elements of the carbon dioxide export pipeline, which will transport the carbon dioxide from Teesside to the Endurance store in the North Sea.

In respect of the offshore elements of the NEP Project, NZNSS has a Storage Licence (Licence No. CS001) and has obtained a Storage Permit (approved on 10 December 2024) from the North Sea

Transition Authority. Furthermore, the Offshore Environmental Statement has been approved under the 'Offshore Oil And Gas Exploration, Production, Unloading And Storage (Environmental Impact Assessment) Regulations 2020' by the Secretary of State, and Pipeline Work Authorisations under the Petroleum Act 1998 were approved on 4 April 2025.

The NEP Project forms part of the East Coast Cluster ('ECC'), one of the UK Government's selected CCUS clusters (including Teesside and Humberside), supporting its pathway to net zero emissions by 2050. NEP will be the carbon dioxide transport and storage provider for the ECC. On 10 December 2024 NEP announced financial close and entry into the execution stage of the Project. Permanent construction works commenced in 2025 and the NEP Project is expected to enter operation from 2028. The NEP infrastructure will serve a number of projects on Teesside, including NZT Power.

The NEP Project is therefore at an advanced stage in its development and has already moved into the construction stage. It is critical to the Government achieving its legally binding 2050 net zero emissions target and it is important that the Project is able to move forward at pace in order to deliver its benefits in terms of decarbonising power and industry, supporting the growth of green industries and delivering new jobs and economic growth.

The NEP Project is located within the administrative boundaries of the boroughs of Redcar and Cleveland south of the River Tees and Stockton-on-Tees north of the Tees on Teesside.

Relationship with NEP

It is evident from a review of the ECH Teesside Project's EIA Scoping Report and the NZT Works Plans, that there are significant interactions and overlaps between NGN's Scoping Boundary (Figures 1.2 and 1.3) and the NZT Order limits for the NEP Project. In particular, the proposed Scoping Boundary for the ECH Teesside Project, includes land that is within (or is in close proximity to) the carbon dioxide gathering network (Work No.6); and above ground installations (Work No. 6A) within the confirmed Order limits for NZT.

It is acknowledged that the EIA Scoping Report¹ references the East Coast Cluster being advanced by the Northern Endurance Partnership. We note that Figure 8.8 of the EIA Scoping Report illustrates purple shading for what appears to be a number of projects in the Teesside locality, but there does not appear to be an associated key to indicate 'Net Zero Teesside Order' – we have assumed the 'NSIPs Teesside' key is likely to include the Net Zero Teesside Order.

We also note from the EIA Scoping Report², that subject to consent being granted, the earliest anticipated commencement of construction works is Q2 2030, with construction anticipated to take some four years to complete across the entire route, noting that specific shorter sections would be constructed over shorter periods. The EIA Scoping Report³ also acknowledges the need for temporary haul roads / access tracks to be established.

Having regard to the above, it is crucial that the Order limits for the NEP Project are taken into account by NGN in undertaking its EIA of the ECH Teesside Project, and that the ECH Teesside Project does not impact on the delivery of the NEP Project given its importance within the ECC. It will be of significant interest to NZNSS as to how the Applicant plans to install the infrastructure comprising the ECH Teesside Project while protecting, and facilitating ongoing future access to NEP's infrastructure. NZNSS is also concerned that the ECH Teesside Project may have a safety impact on NEP. Given these

¹ Paragraph 2.3.9

² Section 4.6

³ Paragraph 4.8.3

concerns, NZNSS would like to understand the safety aspects of the ECH Teesside Project and the impacts that the development may have on NEP.

We have therefore written to NGN to request that NZNSS are kept fully informed of NGN's developing proposals and included within the consultation that is undertaken on the ECH Teesside Project.

Should you have any queries, please do not hesitate to contact [REDACTED] [REDACTED] ([REDACTED]@uk.bp.com)

Yours faithfully,

[REDACTED]

DWD – on behalf of Net Zero North Sea Storage Limited