



SCOPING OPINION:

Proposed Humber Low Carbon Pipelines

Case Reference: EN070006

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

20 May 2022



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1. INTRODUCTION

1.0.1 On 11 April 2022, the Planning Inspectorate (the Inspectorate) received an application for a Scoping Opinion from National Grid Carbon Limited (the Applicant) under Regulation 10 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) for the proposed Humber Low Carbon Pipelines (HLCP) project (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 (in three separate volumes, with Volume II (Figures) in five parts), available from:

- Humber Low Carbon Pipelines EIA Scoping Report Volume I (Main Report)

<http://infrastructure.planninginspectorate.gov.uk/document/EN070006-000026>

- Humber Low Carbon Pipelines EIA Scoping Report Volume II (Figures) Part 1

<http://infrastructure.planninginspectorate.gov.uk/document/EN070006-000027>

- Humber Low Carbon Pipelines EIA Scoping Report Volume II (Figures) Part 2

<http://infrastructure.planninginspectorate.gov.uk/document/EN070006-000028>

- Humber Low Carbon Pipelines EIA Scoping Report Volume II (Figures) Part 3

<http://infrastructure.planninginspectorate.gov.uk/document/EN070006-000029>

- Humber Low Carbon Pipelines EIA Scoping Report Volume II (Figures) Part 4

<http://infrastructure.planninginspectorate.gov.uk/document/EN070006-000030>

- Humber Low Carbon Pipelines EIA Scoping Report Volume II (Figures) Part 5

<http://infrastructure.planninginspectorate.gov.uk/document/EN070006-000031>

- Humber Low Carbon Pipelines EIA Scoping Report Volume III (Appendices)

<http://infrastructure.planninginspectorate.gov.uk/document/EN070006-000032>

- 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 notes on the National Infrastructure Planning website, 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:
<https://infrastructure.planninginspectorate.gov.uk/legislation-and-advice/advice-notes/>
- 1.0.8 This Opinion should not be construed as implying that the Inspectorate agrees with the information or comments provided by the Applicant in their request for an opinion from the Inspectorate. In particular, comments from the Inspectorate in this Opinion are without prejudice to any later decisions taken (e.g. on formal submission of the application) that any development identified by the Applicant is necessarily to be treated as part of a Nationally Significant Infrastructure Project (NSIP) or Associated Development or development that does not require development consent.

2. OVERARCHING COMMENTS

2.1 Description of the Proposed Development

(Scoping Report Section 2)

ID	Ref	Description	Inspectorate's comments
2.1.1	Section 2.2	The wider Project	<p>The Scoping Report outlines the projects that form the wider Zero Carbon Humber consortium, including a summary of Connected Projects in Table 2.1. It is stated that the Connected Projects will be described in more detail in the ES but that these are also subject to change based on a Department for Business, Energy and Industrial Strategy (BEIS) cluster sequencing announcement expected from May 2022.</p> <p>The ES should clearly describe the relationship between the Proposed Development and the Connected Projects including the offshore pipeline. This should include the extent to which the Proposed Development is dependent on their delivery and the development timelines of the other projects, with an explanation of how these will be coordinated.</p>
2.1.2	Section 2.5 and Paragraph 3.7.3	Flexibility	<p>The Inspectorate notes the Applicant's desire to incorporate flexibility into their draft DCO (dDCO) and its intention to apply a 'Rochdale Envelope' approach for this purpose. Section 2.5 states that the ES <i>'will provide clear parameters against which the EIA will be undertaken. This is likely to include clearly defined limits of deviation where flexibility is required for the design.'</i> Paragraph 3.7.3 states that parameters will be defined in the application drawings and dDCO and that the parameters will use the maximum envelope within which the built development may be undertaken to ensure a worst case assessment.</p>

ID	Ref	Description	Inspectorate's comments
			<p>The Applicant should make every attempt to narrow the range of options and explain clearly in the ES which elements of the Proposed Development have yet to be finalised and provide the reasons. At the time of application, any Proposed Development parameters should not be so wide-ranging as to represent effectively different developments.</p> <p>The development parameters should be clearly defined in the dDCO and in the accompanying ES. It is a matter for the Applicant, in preparing an ES, to consider whether it is possible to robustly assess a range of impacts resulting from a large number of undecided parameters. The description of the Proposed Development in the ES must not be so wide that it is insufficiently certain to comply with the requirements of Regulation 14 of the EIA Regulations.</p> <p>It should be noted that if the Proposed Development materially changes prior to submission of the DCO application, the Applicant may wish to consider requesting a new scoping opinion.</p>
2.1.3	Table 2.3 and Figure 2.1	Above ground installations (AGIs)	<p>Table 2.3 describes the indicative locations being considered for the AGIs required for the Proposed Development, including the pumping facility close to the Holderness coast, pipeline inspection gauge (PIG) traps, connection arrangements (for the Connected Projects), multi-junction installations at both sides of the River Humber and block valves. In some but not all instances, maximum development parameters (footprints and heights) are also presented. Table 2.3 does not appear to reference an AGI for the Drax Connected Project if one is required. Several location options are being considered for some AGIs and the search areas for these are illustrated on Figure 2.1.</p> <p>The ES should confirm the maximum number, final parameters (minimum and maximum dimensions, including for temporary vents) and locations of each AGI, including access roads (if required) and</p>

ID	Ref	Description	Inspectorate's comments
			assess any likely significant effects resulting from their construction, operation/ maintenance, or decommissioning.
2.1.4	Paragraphs 2.8.24 to 2.8.27	Special crossings	<p>Paragraphs 2.8.24 to 2.8.27 of the Scoping Report outline that the Proposed Development will cross a range of existing infrastructure, using trenchless techniques for trunk roads, motorways, railways and major watercourses and open cut techniques for other roads and minor watercourses. The crossing technique for the intertidal zone "may" also use trenchless techniques but consideration of alternatives including a cofferdam is underway. It is stated that the ES would identify locations where trenchless techniques "are expected" to be used.</p> <p>The ES should confirm the techniques assumed for each crossing. If flexibility is sought regarding the use of open cut or trenchless techniques, the ES should assess the available options or identify and assess a worst case scenario.</p>
2.1.5	Paragraphs 2.8.31 and 15.8.2	Waste	In order to inform a robust assessment of likely significant effects, the ES should provide information on the storage, management and disposal of waste, including tunnel arisings. Any assumptions in this regard, for example traffic movements and contaminated waste, should be clearly stated in the ES.
2.1.6	Paragraphs 2.8.33 to 2.8.35	Temporary working areas and construction compounds	The ES should identify the location and size of the temporary working areas for the AGIs, as well as the temporary construction compounds. Any likely significant effects resulting from their use should be assessed.
2.1.7	Paragraph 2.8.37 and Insert 2.1	Construction programme	An indicative construction programme is provided at Insert 2.1. It is stated that the overall construction period is approximately 44 months assuming both the carbon dioxide (CO ₂) and hydrogen pipelines are constructed at the same time. Assessments in the ES

ID	Ref	Description	Inspectorate's comments
			should be on the basis of the worst case scenario for the construction phase, including consideration of the possibility of non-simultaneous construction of the pipelines, where this has the potential to result in an extended construction programme and/ or additional impacts.
2.1.8	Paragraph 2.8.9	Construction working width and pipeline trenches	The ES should define the applicable parameters for the construction working width and the pipeline trenches or apply a worse case. It should be clear how these parameters are secured through the dDCO or other legal mechanism.
2.1.9	Paragraph 2.9.1	Lighting	<p>The ES should clearly describe the location and design of lighting, including along the construction working widths and at construction compounds. Any likely significant effects should be assessed.</p> <p>The design standards that any additional lighting will be required to meet should also be described in the ES, including any measures incorporated to avoid intrusive lighting impacts for sensitive receptors.</p>
2.1.10	Paragraphs 14.4.2 and 14.4.3	Access	The ES should identify the locations of access routes to site for construction and maintenance. Any likely significant effects resulting from their use should be assessed.
2.1.11	n/a	Easements	The description of the physical characteristics of the Proposed Development in the ES should include the details of required easements, to ensure that the extent of the likely impacts from the Proposed Development (for example, sterilisation of mineral resource) is fully understood.
2.1.12	n/a	Traffic movements	The ES should include information on the anticipated number and type of vehicle movements during all phases of the Proposed Development.

ID	Ref	Description	Inspectorate's comments
2.1.13	n/a	Demolition	The ES should include a description of any demolition works required to facilitate construction of the Proposed Development. Any likely significant effects resulting from demolition works should be assessed.

2.2 EIA Methodology and Scope of Assessment

(Scoping Report Section 3)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
2.2.1	Section 3.12	Heat and radiation	<p>The Scoping Report states that as the Proposed Development primarily comprises below ground pipelines, no relevant pathway or receptors have been identified that could lead to significant heat effects from the CO₂ or hydrogen stream. In addition, no significant sources of radiation are anticipated. It is therefore proposed to scope heat and radiation out of the ES.</p> <p>The Inspectorate has considered the nature and characteristics of the Proposed Development and agrees that heat and radiation can be scoped out.</p>

ID	Ref	Description	Inspectorate's comments
2.2.2	Section 2.10	Impacts from decommissioning	<p>The ES assessment of impacts resulting from decommissioning should be proportionate but include a description of the process and methods of decommissioning, land use requirements and estimated timescales.</p> <p>Any decommissioning associated with dismantling and replacing particular elements of the Proposed Development (e.g. AGIs) once they reach the end of their design life should be assessed if significant effects are likely to occur.</p> <p>The Inspectorate has provided comments on the proposed approach to assessing impacts from decommissioning in the aspect-specific tables below, where relevant.</p>

ID	Ref	Description	Inspectorate's comments
2.2.3	Section 2.11	Alternatives	The Scoping Report outlines that more detail regarding the alternatives considered during Stage 4: Route Refinement will be provided within a standalone consideration of alternatives chapter in the ES. The ES should include an indication of the main reasons for the option chosen, including how the environmental effects have been taken into account.
2.2.4	Paragraph 2.8.16	Impacts from dewatering	Paragraph 2.8.16 of the Scoping Report states that dewatering of pipeline trenches may be required. The ES should describe the likely need for dewatering during construction and operation, identify sensitive receptors which may be affected (including for example, non-designated archaeological assets as referenced in paragraph 9.5.2 of the Scoping Report) and assess any likely significant effects. The ES and associated management plan documents should set out the minimum environmental requirements that contractors will be required to apply when managing dewatering discharges.
2.2.5	Table 3.1 and Paragraph 3.7.9	Determining significance of effect	The matrix at Table 3.1 of the Scoping Report is proposed to be used in the ES to determine the significance of effect in the absence of topic-specific guidance. In some instances, the matrix indicates a range of possible significance and it is stated that in this case professional judgment would be used to define the significance. The ES should clearly indicate where professional judgment has been used and include an explanation of how the final conclusion as to significance of effect has been reached.
2.2.6	Section 3.9	Transboundary effects	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

ID	Ref	Description	Inspectorate's comments
			<p>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 Advice Note Twelve, available on our website at http://infrastructure.planninginspectorate.gov.uk/legislation-and-advice/advice-notes/</p>
2.2.7	Paragraph 14.7.4	Construction impacts	<p>Paragraph 14.7.4 of the Scoping Report explains that as the scheme design progresses, consideration will be given to moving materials, spoil and Abnormal Indivisible Loads (AILs) by waterways. If this option is pursued, impacts from ships/ barges should be assessed in all relevant aspect chapters of the ES where significant effects are likely.</p>
2.2.8	n/a	Coordination with Environmental Permitting	<p>In light of the use of novel technology for which there may be only limited understanding of the best available techniques, early engagement with the Environment Agency regarding permitting and alignment of the permitting process with the DCO Examination should be considered.</p>
2.2.9	n/a	Existing infrastructure	<p>The assessment in the ES should take into account the locations of existing infrastructure and identify any interactions between it and</p>

ID	Ref	Description	Inspectorate's comments
			the Proposed Development. Any significant effects that are likely to occur should be assessed. The Applicant's attention is drawn to the scoping consultation responses in this regard such as from Northern Gas and National Grid (Appendix 2 of this Opinion).
2.2.10	n/a	Directional drilling	The Applicant is advised to consult with the Canal and River Trust regarding directional drilling proposals for the Ouse, Aire and Calder Navigation and Stainforth and Keadby Canal, to minimise the risk of interference with deep structural sheet piling that may be present in certain locations. The Applicant's attention is drawn to the consultation response from the Canal and River Trust in this regard (see Appendix 2 of this Opinion).
2.2.11	n/a	Scope of assessment	The Inspectorate notes that the topic of Hydrology is addressed within two chapters of the Scoping Report (Chapters 8 and 16) and that this may lead to confusion or overlap in the information presented. For clarity, the Applicant is advised to consider presenting information relating to Hydrology in one place.

3. ENVIRONMENTAL ASPECT COMMENTS

3.1 Agriculture and Soils

(Scoping Report Section 4)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.1.1	Table 4.2 and paragraphs 4.8.3 and 4.8.9	Temporary loss of agricultural land, including Best and Most Versatile (BMV) land – construction and decommissioning	<p>The Applicant proposes to scope out temporary loss of agricultural land including BMV land during construction and decommissioning, as it will be fully reinstated following completion of construction and mitigation will be in place for soil handling and reinstatement. Measures will be described in a Construction Environmental Management Plan (CEMP) and Soil Resource Plan (SRP). Potential effects on soil function will also be assessed separately.</p> <p>The Inspectorate notes that the Scoping Report does not present information about the extent or duration of any temporary loss of agricultural land during construction and decommissioning. This information should be provided in the ES. Where final details are not known, the maximum possible extent should be provided.</p> <p>The Inspectorate agrees that, on the basis that effects would be temporary and reduced through implementation of mitigation measures as described in the Scoping Report, these matters can be scoped out of the ES.</p>
3.1.2	Table 4.2	Permanent loss of agricultural land, including BMV land – pipeline land during operation	<p>The Applicant proposes to scope out assessment of permanent loss of agricultural land, including BMV land, as a result of the operation of the pipelines (noting the approach to AGIs is different). It is stated that any maintenance or repair works would be undertaken in accordance with good practice soil handling methods and therefore no significant effects are likely to occur.</p>

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			<p>The Inspectorate agrees this matter can be scoped out on that basis and that there would be limited permanent land loss associated with the pipeline component.</p>
3.1.3	Table 4.2 and paragraphs 4.8.7 and 4.8.11	Agricultural landholdings – operation and decommissioning	<p>It is proposed to scope out effects to agricultural landholdings during operation and decommissioning, as the majority of land required would be returned to its pre-construction land use (aside from the AGI footprints during operation) and other potential impacts during decommissioning (eg due to disturbance, fragmentation, access restrictions or disruption to water supplies and land drainage) could be managed through a Decommissioning Environmental Management Plan (DEMP). Effects on land drainage are also proposed to be considered separately as part of the hydrology and land drainage assessment (see Chapter 16 of the Scoping Report).</p> <p>The Inspectorate agrees that these matters can be scoped out on the basis presented in the Scoping Report.</p>
3.1.4	Table 4.2 and paragraph 4.8.6	Soil quality and associated ecosystem services - operation	<p>The Applicant proposes to scope out soil quality during operation as the majority of land required for construction will be returned to its pre-construction use and effects to soil and its functions are therefore likely to be limited. Permanent loss of agricultural land at AGIs, including BMV, is scoped in to the ES. Operational maintenance and repair works that could result in disturbance to soil are proposed to be undertaken in accordance with good practice soil handling methods.</p> <p>The Inspectorate agrees that this matter can be scoped out on the basis presented in the Scoping Report.</p>

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.1.5	Table 4.2	Economic effects on landowners – construction, operation and decommissioning	<p>The Applicant proposes to scope out economic effects to landowners, noting that this matter will be addressed via separate agreements that are stated to be outside the scope of the EIA.</p> <p>Based on the information presented in the Scoping Report, the Inspectorate agrees that economic effects on landowners are not likely to result in significant effects and this matter can be scoped out.</p>

ID	Ref	Description	Inspectorate's comments
3.1.6	Section 4.6 and paragraph 4.9.4	Baseline conditions and surveys	<p>The Scoping Report describes data that will be used to establish the baseline conditions. The Applicant proposes to undertake targeted agricultural land classification (ALC) surveys at AGI locations alongside desktop review of existing information sources.</p> <p>The study area for the ALC survey should have sufficient coverage to ensure that the baseline conditions are understood for all areas of agricultural land where significant effects are likely to occur. In this regard, it is noted that Figure 4.2 of Scoping Report Volume II, Part 1 indicates that the pipeline route is primarily BMV land (Grade 1 to 3) and as such the Inspectorate considers that the ALC survey should also incorporate targeted locations along the pipeline route. The Applicant should make effort to agree the scope of the ALC survey with relevant consultation bodies, including local authorities.</p>
3.1.7	Section 4.7	Mitigation	<p>Paragraph 4.7.1 of the Scoping Report explains that an outline SRP would be developed and a detailed SRP would be in place prior to any soil handling operations commencing. The Inspectorate considers that a draft or outline of the SRP should be submitted as part of the ES. It should describe how a benchmark for soil quality will be established</p>

ID	Ref	Description	Inspectorate's comments
			to reference during reinstatement. The Scoping Report also refers to various other mitigation measures, for example processes in the event of animal disease breakout and agreements with farmers to minimise impacts. The ES should identify how any measures that are relied upon to mitigate environmental effects will be secured.
3.1.8	Section 4.8	Effects to soil quality/ function during construction	Paragraph 4.8.2 of the Scoping Report describes some potential impacts to soil quality during construction, including disturbance from excavation and soil stripping. No specific reference is made in this section to other potential impacts, eg compaction from the presence of construction vehicles or heavy machinery. These impacts should be considered in the assessment, where significant effects are likely to occur.
3.1.9	Paragraph 4.8.6	Permanent loss of agricultural land during operation of the AGIs	The Scoping Report states that permanent loss of agricultural land during operation of the AGIs is proposed to be scoped in to the ES at this stage but could be scoped out following completion of the ALC survey, where it shows loss of agricultural land is below the magnitude threshold for a likely significant effect. The Inspectorate agrees that the Applicant can proceed on this basis. The ALC survey should be included within the ES.

3.2 Air Quality

(Scoping Report Section 5)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.2.1	Table 5.2	Emissions from Non-Road Mobile Machinery (NRMM) - construction and decommissioning phases	<p>The Applicant proposes to scope out this matter on the basis that NRMM emissions will represent a small source of emissions relative to ambient local conditions in the vicinity of the locations of demolition, construction and earthworks activities and that the potential impacts would therefore be temporary in nature and negligible overall. In addition, suitable mitigation measures will be incorporated into the CEMP to comply with NRMM standards.</p> <p>Whilst the Inspectorate considers that emissions from NRMM are unlikely to be significant in most cases, in the absence of detail regarding the location of temporary compounds with respect to receptors and the type and duration of NRMM to be deployed, the Inspectorate does not consider that this matter may be scoped out based on current evidence. The ES should include an assessment of emissions from NRMM on sensitive receptors where significant effects are likely.</p>
3.2.2	Table 5.2	Vehicle emissions – all phases	<p>The Applicant proposes to scope out this matter on the basis that traffic trip generation is not anticipated to exceed Institute of Air Quality Management (IAQM)¹ criteria and best practice mitigation measures will be incorporated into the CEMP, therefore the overall impact would be negligible.</p>

¹ Institute of Air Quality Management and Environmental Protection UK (2017) Land-use Planning & Development Control: Planning for Air Quality. v1.2. Institute of Air Quality Management, London.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			<p>The Inspectorate is content that, if the traffic trip generation is confirmed to be less than IAQM criteria for a detailed assessment (including relevant criteria for Air Quality Management Areas (AQMA)), vehicle emissions associated with the construction, operational and decommissioning phases of the Proposed Development are unlikely to give rise to significant effects and this matter can be scoped out from further assessment. If such confirmation is not possible, an assessment should be provided.</p> <p>The ES should also demonstrate that cumulative vehicle movements with other developments would not exceed IAQM thresholds during all phases of the Proposed Development.</p>

ID	Ref	Description	Inspectorate's comments
3.2.3	Paragraphs 5.5.4 and 5.5.5	Non-statutory sites designated for nature conservation and protected species	Paragraphs 5.5.4 and 5.5.5 of the Scoping Report set out a provisional list of statutory ecological sites as sensitive receptors that will be considered in the assessment of air quality. The Applicant should also provide an assessment of air quality impacts on non-statutory sites for nature conservation, including Local Wildlife Sites (LWS) and protected species where significant effects are likely to occur and cross-reference to the ecology chapter (and vice-versa) where relevant.
3.2.4	Paragraph 5.8.4	Flaring of hydrogen	The ES should confirm whether flaring of hydrogen will be required when depressurising the high-pressure hydrogen pipeline for maintenance or any other purposes at the AGIs or anywhere else on the network. If flaring is required, the resulting impacts should be assessed in the ES where significant effects are likely. The Applicant's attention is drawn to the consultation response from the Environment Agency in this regard (see Appendix 2 of this Opinion).

ID	Ref	Description	Inspectorate's comments
3.2.5	n/a	Study area	The ES should include a figure/ figures to identify the final study areas for each element of the air quality assessment, including the location of human and ecological receptors that have been considered.

3.3 Ecology and Biodiversity

(Scoping Report Section 6)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.3.1	Table 6.3	Humber Estuary Ramsar site, Humber Estuary Special Area of Conservation (SAC), Humber Estuary Special Protection Area (SPA), Humber Estuary Site of Special Scientific Interest (SSSI), River Derwent SAC, River Derwent SSSI, Eastoft Meadow SSSI, River Derwent SAC, River Derwent SSSI, Messingham Sand Quarry SSSI, Lower Derwent Valley Ramsar site and Lower Derwent Valley SPA - operational phase	<p>The Applicant proposes to scope out these statutory designated sites from further assessment with regards to the operational phase of the Proposed Development, on the basis that there are no perceivable pathways to impact any of these statutory designated sites during operation.</p> <p>Subject to demonstrating that there is no potential effect pathway between the Proposed Development and these designated sites, then the Inspectorate agrees that this matter can be scoped out.</p>
3.3.2	Table 6.3	Eastoft Meadow SSSI, River Derwent SAC, River Derwent SSSI, Messingham Sand Quarry SSSI, Lower Derwent Valley Ramsar site, and Lower Derwent Valley SPA - decommissioning phase	<p>The Applicant proposes to scope out these statutory designated sites from further assessment with regards to the decommissioning phase of the Proposed Development, on the basis that there are no perceivable pathways to impact any of these statutory designated sites during decommissioning.</p> <p>Subject to demonstrating that there is no potential effect pathway between the Proposed Development and these designated sites, then the Inspectorate agrees that this matter can be scoped out.</p>
3.3.3	Table 6.3	Manton and Twigmoor SSSI, North Killingholme Haven Pits SSSI, Ashbyville Local Nature Reserve (LNR), Thorne Moor SAC, Thorne	<p>The Applicant proposes to scope out these statutory designated sites from further assessment with regards to the construction, operational and decommissioning phases on the basis that the Thorne Moor SAC, Humberhead Peatlands NNR (designated for raised bog habitat), the</p>

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
		<p>and Hatfield Moors SPA, Thorne, Crowle and Goole Moors SSSI, Sugar Mills Ponds LNR, Cleatham Quarry SSSI, Crowle Borrow Pits SSSI, Humberhead Peatlands National Nature Reserve (NNR), Messingham Heath SSSI, Eskamhorn Meadows SSSI and Hatfield Chase Ditches SSSI – all phases</p>	<p>Thorne, Crowle and Goole Moors SSSI (the designated features of the site being almost exclusively associated with the sites mire habitat) and the Hatfield Chase Ditches SSSI and the Crowle Borrow Pits SSSI are located upstream of the Scoping Route Corridor. The Proposed Development is not anticipated to impact upstream hydrology and is therefore unlikely to impact the conservation objectives and designated features of these sites.</p> <p>The Thorne and Hatfield Moors SPA, designated for its breeding nightjar population, is 1.1km south of the Scoping Route Corridor. Nightjars are a predominantly heathland species and the habitats within the Scoping Route Corridor are largely sub-optimal for this species (i.e. open agricultural land) and are unlikely to represent land that is 'Functionally Linked' to the SPA. No perceived effects on breeding nightjar have been identified.</p> <p>All other statutory designated sites (Manton and Twigmoor SSSI, North Killingholme Haven Pits SSSI, Messingham Heath SSSI, Eskamhorn Meadows SSSI, Cleatham Quarry SSSI, Ashbyville LNR and Sugar Mills Ponds LNR) lack perceivable impact pathways such as hydrological connectivity or are located more than 300m from the Scoping Route Corridor. It is therefore considered that any effects on statutory designated sites as a result of a potential pollution event during construction are unlikely to be significant given the distance pollutants would need to travel to reach the sites and all other statutory designated sites.</p> <p>The Inspectorate considers that if it can be demonstrated there is no potential effect pathway between the Proposed Development and these designated sites, then the Inspectorate agrees that these can be scoped out.</p>

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.3.4	Table 6.3	Non-statutory designated sites within the Scoping Route Corridor and with hydrological connectivity to AGI locations - operational phase	<p>The Applicant proposes to scope this matter out of further assessment on the basis that there are no perceivable pathways to impact any of these non-statutory designated sites during operation.</p> <p>The Inspectorate considers that if it can be demonstrated there is no potential effect pathway between the Proposed Development and these designated sites, then the Inspectorate agrees that these can be scoped out.</p>
3.3.5	Table 6.3	Non-statutory designated sites within the Scoping Route Corridor or with hydrological connectivity to the Scoping Route Corridor (excluding AGI locations) - operational and decommissioning phases	<p>The Applicant proposes to scope this matter out of further assessment on the basis that there are no perceivable pathways to impact the sites.</p> <p>The Inspectorate considers that if it can be demonstrated there is no potential effect pathway between the Proposed Development and these designated sites, then the Inspectorate agrees that this matter can be scoped out.</p>
3.3.6	Table 6.3	Non-statutory designated sites outside the Scoping Route Corridor and without hydrological connectivity or other potential impact pathway to the Proposed Development – all phases	<p>The Applicant proposes to scope this matter out of further assessment with regards to all phases on the basis of a lack of perceivable impact pathways, such as hydrological connectivity to the Scoping Route Corridor.</p> <p>The Inspectorate considers that if it can be demonstrated there is no potential effect pathway between the Proposed Development and these designated sites, then the Inspectorate agrees that this matter can be scoped out.</p>
3.3.7	Table 6.3	Arboricultural features (Tree Preservation Order trees and veteran trees) - operational and decommissioning phases	<p>The Applicant proposes to scope out this matter from further assessment with regard to the phases identified on the basis that there are no perceivable pathways to impact arboricultural features.</p>

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			The Inspectorate considers that if it can be demonstrated there is no potential effect pathway between the Proposed Development and these features, then the Inspectorate agrees that this matter can be scoped out.
3.3.8	Table 6.3	Ancient woodland – all phases	<p>The Applicant proposes to scope this matter out of further assessment on the basis that areas of recognised ancient woodland are located at least 550m beyond the Scoping Route Corridor with no hydrological connectivity to the Scoping Route Corridor and indirect effects (e.g. pollution from dust/ machinery emissions during construction and decommissioning) are unlikely to be significant at this distance.</p> <p>The Inspectorate is content with this approach.</p>
3.3.9	Table 6.3	Priority Habitats, intertidal ecology, fish and water vole - operational phase	<p>The Applicant proposes to scope out these matters from further assessment with regard to the phase identified on the basis that there are no perceivable pathways to impact Priority Habitats, intertidal ecology, fish or water vole during operation.</p> <p>The Inspectorate considers that if it can be demonstrated there is no potential effect pathway between the Proposed Development and the habitats, ecology and species identified, then the Inspectorate agrees that these can be scoped out.</p>
3.3.10	Table 6.3	Marine ecology, reptiles, breeding birds and Non-Native Invasive Species (NNIS) - operational and decommissioning phases	<p>The Applicant proposes to scope out these matters from further assessment on the basis that there are no perceivable pathways to impact these receptors during operation and decommissioning and it is therefore considered that any effects are unlikely to be significant.</p> <p>The Inspectorate considers that if it can be demonstrated there is no potential effect pathway between the Proposed Development and the</p>

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			receptors identified, then the Inspectorate agrees that these can be scoped out.
3.3.11	Table 6.3	Great Crested Newt (GCN) - all phases	<p>The Applicant proposes to scope this matter out of further assessment on the basis that GCN are widespread throughout the region and therefore licensing and mitigation will be required to minimise impacts to this species, sought from Natural England.</p> <p>The Applicant intends to offset the effects of the Proposed Development on GCN by obtaining a licence through the Natural England District Level Licensing (DLL) scheme. The Inspectorate understands that the DLL approach includes strategic area assessment and the identification of risk zones and strategic opportunity area maps. The ES should include information to demonstrate whether the Proposed Development is located within a risk zone for GCN. If the Applicant enters into the DLL scheme, NE will undertake an impact assessment and inform the Applicant whether their scheme is within one of the amber risk zones and therefore whether the Proposed Development is likely to have a significant effect on GCN. The outcome of this assessment will be documented on an Impact Assessment and Conservation Payment Certificate (IACPC). The IACPC can be used to provide additional detail to inform the findings in the ES, including information on the Proposed Development's impact on GCN and the appropriate compensation required.</p>
3.3.12	Table 6.3	Other notable mammals (dormouse, brown hare, hedgehog, polecat, pine marten and harvest mouse) – all phases	<p>The Applicant proposes to scope these matters out of further assessment.</p> <p>The Proposed Development is situated outside the natural range of the dormouse and this species is considered to be absent from the</p>

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			<p>study area. On this basis, the Inspectorate agrees that dormice can be scoped out of further assessment.</p> <p>The Inspectorate has considered the nature and characteristics of the Proposed Development and the records of presence (or anticipated presence) of brown hare, hedgehog, polecat, pine marten and harvest mouse within the Scoping Route Corridor. The Inspectorate agrees that effects on hedgehog, harvest mouse and brown hare may be scoped out. In light of the potential impact of the Proposed Development on field boundaries and hedgerows, the ES should assess potential impacts on polecat and pine marten during construction, operation and decommissioning where significant effects are likely to occur.</p>

ID	Ref	Description	Inspectorate's comments
3.3.13	Paragraph 6.7.4	Biodiversity Net Gain (BNG)	<p>The Inspectorate notes that BNG proposals are currently being considered by the Applicant. The assessment of BNG reported within the ES should be based on an appropriate metric that allows clear understanding of how gains and losses have been calculated. The ES should clearly distinguish between mitigation for significant adverse effects on biodiversity from wider enhancement measures.</p>
3.3.14	n/a	Confidential annexes	<p>Public bodies have a responsibility to avoid releasing environmental information that could bring about harm to sensitive or vulnerable ecological features. Specific survey and assessment data relating to the presence and locations of species such as badgers, rare birds and plants that could be subject to disturbance, damage, persecution, or commercial exploitation resulting from publication of the information, should be provided in the ES as a confidential annex. All other</p>

ID	Ref	Description	Inspectorate's comments
			assessment information should be included in an ES chapter, as normal, with a placeholder explaining that a confidential annex has been submitted to the Inspectorate and may be made available subject to request.

3.4 Climate

(Scoping Report Section 7)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.4.1	Paragraph 7.4.2	All project elements other than AGIs from operational phase climate change adaption and resilience assessment	<p>The Scoping Report states that as the proposed pipelines would be buried underground, they are not considered vulnerable to the climate during the operational phase.</p> <p>The Inspectorate is content that the buried pipelines can be scoped out of the operational phase climate change adaption and resilience assessment. In addition to AGIs, impacts on all above ground components, including block valves should be assessed in the operational phase climate change adaption and resilience assessment where significant effects are likely.</p>
3.4.2	Table 7.2 and Paragraph 7.5.2	Climate risks during the construction phase from climate change adaptation and resilience assessment	<p>The Scoping Report states that the construction period will not be susceptible to climatic changes due to its relatively short duration (up to 44 months). The Inspectorate does not consider sufficient evidence has been provided to scope this matter out of the assessment.</p> <p>The ES climate change adaptation and resilience assessment should assess climate risks during the construction phase (such as extreme temperatures, extreme precipitation or storm events) where significant effects are likely.</p>
3.4.3	Table 7.2	Greenhouse gas (GHG) emissions resulting from land use, land use change and forestry during construction (carbon life stage A5)	<p>The Scoping Report states that as the Proposed Development mainly comprises underground pipelines with minimal land impact, current emissions from land use and future emissions arising from a change in land use would be insignificant.</p> <p>Considering the nature and characteristics of the Proposed Development, the Inspectorate is content that GHG emissions from resulting from land use, land use change and forestry during</p>

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			construction (carbon life stage A5) are not likely to result in significant effects and can be scoped out of the ES assessment.
3.4.4	Table 7.2	GHG emissions resulting from maintenance and replacement and refurbishment of components during operation (carbon life stages B2 to B5)	<p>The Scoping Report states that maintenance will be infrequent and relatively minor in nature and is not considered to be a large emissions source. GHG emissions resulting from the replacement and refurbishment of components during the 40 year design life of the Proposed Development are expected to be insignificant.</p> <p>Considering the nature and characteristics of the Proposed Development, the Inspectorate is content that GHG emissions from maintenance and replacement and refurbishment of components during operation (carbon life stages B2 to B5) are not likely to result in significant effects and can be scoped out of the ES assessment.</p>

ID	Ref	Description	Inspectorate's comments
3.4.5	Paragraphs 8.6.20 to 8.6.22	GHG emissions arising from disturbance of landfill sites and other sources of ground gas	<p>The Inspectorate notes from paragraphs 8.6.20 to 8.6.22 of the Scoping Report that landfills have been identified within the Scoping Route Corridor and that other potential sources of ground gas may also be present.</p> <p>Notwithstanding the Inspectorate's comments in Row ID 3.4.3 above, in the event that the pipeline route cannot avoid these sites, the potential to increase, or give rise to, GHG emissions from these sites during construction should be included in the assessment.</p>

3.5 Geology and Hydrology

(Scoping Report Section 8)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.5.1	n/a	n/a	No matters have been proposed to be scoped out of the assessment.

ID	Ref	Description	Inspectorate's comments
3.5.2	Paragraphs 8.2.2, 8.7.3 and 8.7.4	Guidance	The Inspectorate advises that the Environment Agency's Land Contamination Technical Guidance and approach to groundwater protection should be followed when considering potential land or groundwater contamination effects. The Applicant's attention is drawn to the consultation response from the Environment Agency in this regard (see Appendix 2 of this Opinion).
3.5.3	Paragraphs 8.5.1 and 8.6.6	Scope of assessment – bedrock geologies	<p>The Applicant has provided a list of bedrock geologies within the Scoping Report, however the list provided is not exhaustive and several important bedrock aquifers have not been identified, including Kirton Cementstone Beds, Scawby Limestone, Hibaldstow Limestone, Ravensthorpe Beds, Santon Oolite, all of which comprise the Lincolnshire Limestone aquifer. In addition, Blisworth Limestone is a principal aquifer and Cornbrash Formation is a Secondary A aquifer; both of these are crossed by the pipeline route. These need to be included within future assessment work.</p> <p>The Applicant's attention is drawn to the consultation response from the Environment Agency in this regard (see Appendix 2 of this Opinion).</p>

ID	Ref	Description	Inspectorate's comments
3.5.4	Paragraph 8.6.16	Scope of assessment – Water Framework Directive (WFD) groundwater bodies	Blisworth Limestone Rutland Formation (ID GB40401G444500) and Cornbrash (ID GB40402G444700) are missing from the list of WFD groundwater bodies and should be included within future assessment work. The Applicant's attention is drawn to the consultation response from the Environment Agency in this regard (see Appendix 2 of this Opinion).
3.5.5	Paragraphs 8.6.17-8.6.18	Scope of assessment – deregulated water supplies	The Applicant is advised that deregulated supplies still in use are potential receptors which need to be considered within future assessment work. The Applicant's attention is drawn to the consultation response from the Environment Agency in this regard (see Appendix 2 of this Opinion).
3.5.6	Paragraph 8.8.2	Scope of assessment – groundwater resource losses	The Inspectorate advises that the potential for groundwater resource losses, should artesian flow be encountered during construction excavations, should be included within future assessment work. The Applicant's attention is drawn to the consultation response from the Environment Agency in this regard (see Appendix 2 of this Opinion).

3.6 Cultural Heritage

(Scoping Report Section 9)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.6.1	Table 9.2	Intertidal and marine archaeology at the Humber Estuary – construction and operation	<p>The Applicant proposes that, due to the distance of the proposed trenchless crossing and tunnel portals from the banks of the Humber Estuary (where potential archaeology may be present at low or high tide), this matter should be scoped out of the ES. The Applicant indicates this position is agreed with relevant consultation bodies.</p> <p>The Inspectorate agrees that this matter can be scoped out on that basis. However, should the further baseline studies proposed to inform assessment identify presence of archaeology that could be affected by the Proposed Development, the ES should include an assessment where significant effects to any such assets are likely.</p>
3.6.2	Table 9.2	Built heritage – physical impacts during construction and operation	<p>The Applicant proposes to assess effects resulting from changes to the setting of built heritage assets during construction and operation of the Proposed Development, but states that no impacts to the physical fabric of built heritage assets are anticipated since the majority of built heritage assets are located outside of the Scoping Route Corridor. Five Grade II listed buildings are located within the Scoping Route Corridor. Commitment 6 in Appendix F Draft Commitments Register (Scoping Report, Volume III) states that the Proposed Development “<i>will seek to avoid any physical impacts to any listed buildings located within the Scoping Route Corridor</i>”.</p> <p>The Inspectorate considers that on the basis of the information presented in the Scoping Report it is unlikely that there would be any significant effects to the physical fabric of built heritage assets; however, as the final route of the pipeline is not determined there is potential for the five Grade II listed buildings within the Scoping</p>

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			Route Corridor to be physically impacted and if this is the case, the ES should include an assessment of physical impacts where significant effects are likely to occur.
3.6.3	Table 9.2	Historic landscape character – construction and operation	<p>The Applicant proposes that this matter be scoped out of the ES (aside from Isle of Axholme area of special historic landscape interest, which is proposed to be scoped in) as the landscape will be reinstated following construction and effects would therefore be temporary, and because the AGIs will be located next to existing industrial emitters. The Applicant indicates that this position is agreed with relevant consultation bodies.</p> <p>The Inspectorate does not have sufficient information to exclude the possibility of significant effects to historic landscape character during construction or operation. The construction period is anticipated to be circa 44 months and it is unclear from information presented in the Scoping Report whether activities would impact on any areas of historic landscape character and/ or over what duration impacts might be experienced. In addition, there may be operational impacts as a result of pipelines bisecting parish boundaries, field systems and areas of well-preserved ridge and furrow.</p> <p>An understanding of historic landscape character is essential to an informed understanding of the significance of effects and the areas of particular attention required in terms of recording and reinstatement. The ES should include information about the baseline historic landscape character within the study area and how any features within it might be affected during construction and operation phases.</p> <p>Where significant effects are likely, an assessment should be included in the ES and the Applicant should make effort to agree the methodology for assessment, including any bespoke approaches</p>

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			<p>required, eg for military installations and crash sites, with relevant consultation bodies including Historic England.</p> <p>The Applicant's attention is drawn to the consultation responses from Historic England and North Lincolnshire Council in this regard (see Appendix 2 of this Opinion).</p>
3.6.4	Table 9.2	Decommissioning impacts	<p>The Scoping Report seeks to scope out effects to terrestrial archaeology, intertidal and marine archaeology, built heritage and historic landscape character from decommissioning activity on the basis that works would not cause any further physical impacts beyond those experienced during construction, works would be temporary, and works would reverse negative effects arising from changes to setting during construction and operation of the AGIs.</p> <p>The Inspectorate agrees that this matter can be scoped out on that basis, and on the basis that the pipelines would be left in situ following decommissioning.</p>

ID	Ref	Description	Inspectorate's comments
3.6.5	Section 9.4	Study area	<p>The Scoping Report describes that a 500m study area will be applied from the Scoping Route Corridor for assessment of designated and non-designated heritage assets, extended in two instances to incorporate four (Grade I and II) listed buildings slightly beyond 500m that have a historical and/ or functional relationship with other heritage assets within the 500m study area. Due to the linear nature of the Proposed Development, it is stated that the 500m study area is sufficient to understand archaeological potential and to identify any significant effects arising from changes to setting.</p>

ID	Ref	Description	Inspectorate's comments
			<p>The Inspectorate is content with this approach subject to consideration of the potential for significant effects to the setting of heritage assets over a wider study area arising from the presence of the proposed AGIs, in particular the proposed Easington Pumping Station, which includes a vent with a maximum height of 45m. In this regard, the Inspectorate notes that the study area for the landscape and visual impact assessment, as described in Section 10 of the Scoping Report, extends to 1.5km around the proposed AGIs and 5km around the proposed Easington Pumping Station, with two Grade I and one Grade II* listed buildings, and two conservation areas, falling within this wider study area, which are not currently included within the 500m study area for cultural heritage.</p>
3.6.6	Section 9.6	Baseline conditions – archaeological investigation	<p>The Scoping Report states that a geoarchaeological desk-based assessment will be undertaken, including a deposit model, to support understanding of the potential for archaeological and paleoenvironmental remains. Following completion of this work, further discussion is proposed with relevant consultation bodies about whether a phase of targeted fieldwork may be needed to inform the understanding of baseline conditions for assessment in the ES.</p> <p>The Inspectorate notes North Lincolnshire Council's responses regarding below ground assets (see Appendix 2 of this Opinion) and that the Scoping Route Corridor has not been subject to previous investigation.</p> <p>The approach to establishing the baseline conditions must be sufficient to enable a robust assessment of likely significant effects and any mitigation required thereafter. The Inspectorate advises that the Applicant undertakes sufficient geophysical survey to inform the requirement for further targeted intrusive archaeological investigation.</p>

ID	Ref	Description	Inspectorate's comments
			<p>The Applicant should make effort to agree the scope of any geophysical survey and intrusive investigation with relevant consultation bodies.</p> <p>The attention is drawn to the consultation response from North Lincolnshire Council and the joint response from North Yorkshire County Council and Selby District Council in this regard (see Appendix 2 of this Opinion)</p>
3.6.7	Table 9.3	Methodology – heritage asset value	<p>The Inspectorate advises that a clear justification should be provided for the allocation of sensitivity or value to each heritage asset considered in the assessment using the criteria in Table 9.3 of the Scoping Report. This should include reference to the relevant National Policy Statement(s) (NPS)/ National Planning Policy Framework (NPPF), other relevant guidance and baseline information and the results of any intrusive archaeological investigation where relevant.</p> <p>The Applicant's attention is drawn to the consultation responses from Historic England and North Lincolnshire Council in this regard (see Appendix 2 of this Opinion).</p>
3.6.8	Section 9.7	Design, mitigation and enhancement measures	<p>The Scoping Report indicates that an Outline Heritage Mitigation Strategy (OHMS) will be submitted with the DCO application. In the event that the ES concludes that there is a requirement for further archaeological investigation and recording, the Inspectorate considers that an outline written scheme of investigation should form part of the OHMS.</p>
3.6.9	Section 9.9	Assessment methodology	<p>The Applicant has explained the proposed approach to determining significance of effect in the assessment of cultural heritage and archaeology in the ES. The ES should present the outcome of the assessment in a manner that enables the reader to understand the significance of effect in EIA terms, as well as the degree of harm to</p>

ID	Ref	Description	Inspectorate's comments
			<p>the significance of the heritage asset in the context of the relevant NPS(s) and NPPF.</p> <p>The Applicant's attention is drawn to the consultation response from Historic England in this regard (see Appendix 2 of this Opinion).</p>
3.6.10	n/a	Visualisations	<p>The Scoping Report does not indicate whether visualisations would be produced to inform the assessment of indirect effects to the setting of heritage assets. Representative viewpoints are proposed as part of the assessment of landscape effects but the locations have not been provided so it is not clear whether these would be suitable. The Applicant should make effort to agree with relevant consultation bodies whether any additional visualisations are required and, if so, the number and location to be produced.</p>
3.6.11	n/a	Scope of assessment - description of likely significant effects	<p>The Applicant is advised that the potential for dewatering impacts on organic rich deposits (e.g. alluvium and peat) should be assessed for the construction and decommissioning phases of the Proposed Development where significant effects are likely to occur.</p> <p>The Applicant's attention is drawn to the consultation response from Historic England in this regard (see Appendix 2 of this Opinion).</p>
3.6.12	n/a	Scope of assessment - description of likely significant effects	<p>The Applicant is advised that consideration should be given to the potential for construction impacts such as noise, dust and odour to result in likely significant effects on the setting of heritage assets.</p>

3.7 Landscape

(Scoping Report Section 10)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.7.1	Table 10.2	Changes to landscape character and visual amenity of surrounding sensitive receptors due to the pipelines - operation	<p>The Applicant proposes to scope out effects to landscape character and existing visual amenity of receptors during operation of the pipelines on the basis that the land above the pipelines would be reinstated following installation and/ or other appropriate mitigation measures would be implemented. The Applicant indicates that this position is agreed with relevant consultation bodies.</p> <p>The Inspectorate is content that significant effects on landscape character and visual amenity are not likely to arise from operation and maintenance of the buried pipelines and agrees that these matters can be scoped out of the ES.</p> <p>However, the Inspectorate advises that consideration should be given to the potential for operational phase effects to landscape character and visual amenity as a result of any planting restrictions imposed by easements. The ES should assess any likely significant effects.</p>
3.7.2	Table 10.2	Receptors beyond a 1.5km radius of the AGIs (except Pumping Facility at Easington, where the radius is 5km) – construction and operation	<p>The Applicant proposes to scope out landscape and visual receptors beyond a 5km radius from the centre of the Easington Pumping Facility, and beyond a 1.5km radius for all other AGIs, on the basis that initial desktop review has indicated it is unlikely significant effects would be experienced beyond these distances. The initial desktop review is informed by zone of theoretical visibility (ZTV) modelling and ground truthing through site visits in February/ March 2022. The Applicant indicates that this position is agreed with relevant consultation bodies.</p>

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			<p>The Inspectorate considers that, given the nature and scale of the AGIs it is unlikely that they would give rise to likely significant landscape and visual effects to receptors beyond the stated distances.</p> <p>However, the ZTV modelling has not been provided with the Scoping Report and it is unclear whether it has been based on the maximum parameters of the AGIs, as the description at paragraph 10.4.3 does not refer to the temporary vents that would be the tallest component (described in Table 2.3 as having a maximum height 15m). It is not clear how frequently and for what duration the temporary vents would be required. At this stage there is also an absence of certainty about the location of construction activities and facilities.</p> <p>The Inspectorate considers that the potential for significant effects from construction and operation of the AGIs beyond the stated distances cannot be excluded. The ES should demonstrate that the ZTV is based on a worst case envelope or provide an assessment of receptors based on the maximum parameters where significant effects are likely.</p>
3.7.3	Table 10.2	Receptors beyond a 1km radius for pipelines – construction and operation	<p>The Scoping Report proposes to scope out receptors beyond a 1km radius for the proposed pipeline on the basis that it is unlikely that they would experience significant effects.</p> <p>The Inspectorate considers that in the absence of certainty regarding the location of construction activities and facilities, the potential for significant effects during construction of the pipelines beyond a 1km radius cannot be excluded. The ES should assess impacts on all receptors where significant effects are likely or otherwise present a justification in the ES as to why significant effects are not likely, once further detail regarding construction facilities is available.</p> <p>As described above, the Inspectorate is content that significant effects on landscape character and visual amenity are not likely to</p>

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			<p>arise from operation and maintenance of the pipelines. On that basis, receptors located beyond 1km radius of the pipelines can be scoped out of the assessment of operational effects.</p>
3.7.4	Table 10.2	Residential visual amenity assessment – construction and operation	<p>The Scoping Report identifies occupiers of residential properties could be affected by the Proposed Development but seeks to scope out a residential visual amenity assessment. Effects on views from private properties would be assessed using representative viewpoints from publicly accessible locations and use of professional judgment.</p> <p>The Inspectorate notes that the Scoping Route Corridor and study area for landscape and visual impacts is generally sparsely populated and rural agricultural in nature, with some industrial land use and low density residential areas.</p> <p>Considering the nature of the study area and the Proposed Development, the Inspectorate is content that a residential visual amenity assessment can be scoped out of the ES and that visual effects to occupiers of residential properties can be undertaken on the basis described in the Scoping Report.</p>
3.7.5	Paragraph 10.9.6	Decommissioning	<p>Paragraph 10.9.6 of the Scoping Report describes the scenarios that are proposed to be assessed, which includes the decommissioning phase. However, Table 10.2, which describes matters to be scoped in or out of the ES, does not reference the decommissioning phase. For the avoidance of doubt, the Inspectorate considers that impacts during decommissioning should be scoped in to the ES. Please refer to the Inspectorate's further comments at Row ID 2.2.2 of this Scoping Report.</p>

ID	Ref	Description	Inspectorate's comments
3.7.6	Section 10.5	Receptors	A list of potential visual receptors is provided at paragraph 10.5.2 of the Scoping Report. In addition to the categories listed, consideration should also be given to other potential visual receptors, such as users of canals and waterways, cycle networks, and visitors to the Brocklesby Registered Park and Garden of Historic Interest where significant effects are likely to occur.
3.7.7	Section 10.5 and paragraph 10.6.3	Landscape features	The ES should consider features such as trees, hedgerows and areas of agricultural land in terms of their contribution to landscape character and setting.
3.7.8	Section 10.6	Landscape baseline	The Scoping Report identifies that there are no nationally designated landscapes within the study area but no reference is made to local landscape designations. Information about local landscape designations, such as Areas of Great Landscape Value at Searby/Bigby escarpment and Brocklesby Park, should be included in the baseline description and considered in the ES, where significant effects are likely to occur.
3.7.9	Section 10.6	Visual baseline	<p>The Scoping Report does not include the ZTV modelling used to inform areas of potential visibility of the Proposed Development but <i>'it is anticipated that they [ZTV] will be presented in the PEIR [Preliminary Environmental Information Report] and ES.'</i></p> <p>The ZTV modelling plays an integral role in establishing the baseline used in the visual impact assessment. The Inspectorate considers that it should be presented in the ES, together with a description of how it has been prepared.</p>
3.7.10	Section 10.6	Baseline information and surveys	The Inspectorate notes that the Proposed Development has the potential to affect existing hedgerows during construction and operation. It is considered that a hedgerow survey should be

ID	Ref	Description	Inspectorate's comments
			undertaken to establish the baseline condition, including whether there are any important hedgerows under the Hedgerow Regulations 1997. The ES should include information about the outcomes of the survey.
3.7.11	Paragraph 10.7.6	Mitigation	Paragraph 10.7.6 of the Scoping Report refers to mitigation for landscape and visual impacts after completion of works forming part of a landscape and biodiversity strategy. The Inspectorate considers that an outline or draft of the strategy should be submitted as part of the ES.
3.7.12	Section 10.9	Assessment methodology – representative viewpoints	<p>The Inspectorate notes that the Applicant proposes to produce representative viewpoints to inform the impact assessment from a maximum of 49 viewpoint locations dependent on the final layout of proposed AGIs. An indicative list of the locations has not been provided with the Scoping Report. The Applicant states that these will be agreed with the local authorities through further consultation. The Inspectorate welcomes this confirmation and advises the Applicant to make effort to agree the locations with other relevant consultation bodies, for example the Canal and River Trust.</p> <p>In finalising the viewpoint locations, the Applicant should give consideration to the production of representative viewpoints from the network crossings of the Aire and Calder Navigation and Stainforth and Keadby Canal and a view of the pipeline from the River Ouse to support a comprehensive assessment of visual impact to waterways.</p> <p>The Inspectorate considers that Historic England's published setting advice, <i>The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition) (GPA3)</i> is of relevance to the assessment of effects to the landscape setting of heritage assets. The Applicant should consider the production of dynamic and kinetic assessments that engage with movement</p>

ID	Ref	Description	Inspectorate's comments
			<p>through the landscape (not just fixed point views) and the need for viewpoints from locations that are not publicly accessible.</p> <p>The assessment should not be limited to a summary of the viewpoints and should aim to describe and assess the full effects of the Proposed Development on landscape and visual receptors, including through the use of mapping of effects to illustrate geographical extent.</p>
3.7.13	n/a	Guidance	<p>The Inspectorate notes that the Landscape Institute published <i>Technical Guidance Note (TGN) 02-21: Assessing landscape value outside national designations</i> in May 2021. The ES should reference this guidance where relevant.</p>
3.7.14	n/a	Topographical survey	<p>The Applicant should make effort to agree the need for proportionate topographical survey for above ground elements of infrastructure with the relevant local planning authorities.</p> <p>The Applicant's attention is drawn to the joint consultation response from North Yorkshire County Council and Selby District Council in this regard (see Appendix 2 of this Opinion).</p>

3.8 Noise and Vibration

(Scoping Report Section 11)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.8.1	Table 11.2	Traffic flows (human receptors) - operational phase	<p>The Applicant wishes to scope out this matter from further assessment on the basis that AGIs will not be manned and therefore operational phase traffic flows will not give rise to significant adverse noise effects on nearby human receptors.</p> <p>The Inspectorate agrees that, subject to confirmation of the number and type of vehicle operational vehicle movements in the ES description of development, operational traffic flows are not likely to result in significant effects and that an assessment of this matter can be scoped out of the ES.</p>
3.8.2	Table 11.2	Noise from operation of the pipelines (human receptors)	<p>The Applicant wishes to scope out this matter from further assessment on the basis that buried pipelines will not generate significant noise levels.</p> <p>The Inspectorate considers that significant noise effects from buried pipelines are unlikely and is content this matter can be scoped out of further assessment.</p>
3.8.3	Table 11.2	Noise from operation of the PIG traps and block valves (human receptors)	<p>The Applicant wishes to scope out this matter from further assessment on the basis that PIG trap and block valve AGIs are not expected to generate significant levels of noise during normal operation.</p> <p>The Inspectorate agrees that this matter can be scoped out of further assessment. The ES should include relevant engineering specifications to demonstrate that there are no sources of noise producing equipment and should demonstrate that consultation has been</p>

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			undertaken with relevant Environmental Health Officers on any necessary control measures.
3.8.4	Table 11.2	Vibration (human receptors) - operational phase	<p>The Applicant wishes to scope out this matter from further assessment on the basis that significant ground borne vibration resulting from the AGIs is not anticipated, due to low levels of vibration from equipment installations or through inclusion of appropriate vibration isolation.</p> <p>The Inspectorate agrees that this matter can be scoped out of further assessment. The ES should include relevant engineering specifications to demonstrate that there are no sources of vibration producing equipment and/ or that that consultation has been undertaken with relevant Environmental Health Officers on any necessary control measures.</p>

ID	Ref	Description	Inspectorate's comments
3.8.5	Paragraph 11.7.1	Mitigation measures	The ES should include an assessment of any environmental effects generated by the presence of any mitigation measures (e.g. landscape and visual effects of noise screening), where significant effects are likely to occur.
3.8.6	Paragraph 11.9.3	Methodology	The ES should explain how vibration criteria used to determine impact significance will inform the mitigation and monitoring requirements in the CEMP/ DEMP.

3.9 Socio-economics

(Scoping Report Section 12)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.9.1	Table 12.2	Local economy and employment (potential disruption to future and existing businesses) - operational and decommissioning phases	The Applicant proposes to scope out this matter from further assessment on the basis that businesses are unlikely to be affected during the operation and decommissioning of the Proposed Development, therefore the potential for significant effects is unlikely. The Inspectorate is content with this approach.
3.9.2	Table 12.2	Community facilities including schools, community centres, libraries, health (GPs, dentists, hospitals), sports halls & swimming pools – operational phase	The Applicant proposes to scope out this matter from further assessment on the basis that the static and underground nature of the pipelines, together with the generally unintrusive characteristics of AGIs means that there should not be any disruption to access to community facilities or significant effects from noise, once the Proposed Development is operational. The Inspectorate agrees that, on this basis, the potential for significant effects would be unlikely and is therefore content that this matter can be scoped out of further assessment.

ID	Ref	Description	Inspectorate's comments
3.9.3	Paragraph 12.9.3	Scope of assessment – tourism	The Scoping Report proposes to assess impacts on tourist businesses along the stretch of coastline on the landward side of the Proposed Development, but the Inspectorate considers that the Proposed Development also has the potential to impact on tourism away from the coast. For clarity, this matter should be included in the scope of future assessment work, or the Applicant should provide justification with regards to the limited scope of assessment. The Applicant should

ID	Ref	Description	Inspectorate's comments
			make effort to agree the detailed assessment approach with North Lincolnshire Council.
3.9.4	n/a	Housing affordability and availability	<p>The Scoping Report recognises the potential for “<i>significant numbers</i>” of non-home-based construction workers, together with a requirement for temporary living accommodation within reasonable commuting distance of the Proposed Development.</p> <p>The Inspectorate advises that a significant number of non-home-based construction workers could foreseeably have an impact on the local availability of affordable housing. Further assessment work should include effects on the local private rented sector and tourist accommodation. Additionally, the cumulative effect from other large developments nearby should be considered.</p> <p>The Applicant’s attention is drawn to the consultation response from the United Kingdom Health Security Agency in this regard (see Appendix 2 of this Opinion).</p>

3.10 Human Health and Wellbeing

(Scoping Report Section 13)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.10.1	Table 13.2	Dwellings and community infrastructure - operational phase	<p>The Applicant proposes to scope out this matter on the basis that the Proposed Development is a static, predominantly underground, piece of infrastructure that will have a negligible effect on people living close by and/ or users of nearby community infrastructure. In addition, the AGI locations identified are mainly in agricultural areas and not typically in close proximity to dwellings and community infrastructure.</p> <p>The Inspectorate considers that, on this basis, the potential for significant effects is unlikely and therefore agrees that this matter can be scoped out of further assessment.</p>

ID	Ref	Description	Inspectorate's comments
3.10.2	n/a	Scope of assessment – private water supplies	The Inspectorate advises that potential human health impacts, hazards and public health receptors surrounding private drinking water supplies during the construction phase, including the potential for contamination or disruption, should be scoped into further assessment work and reported upon within the human health chapter of the ES, where significant effects are likely.
3.10.3	n/a	Scope of assessment – effects on mental health	Notwithstanding the Inspectorate's comments above in Row ID 3.10.1 above, the Inspectorate advises that given the scale and nature of the Proposed Development, effects on mental health, including the potential for local public concern through understanding of risk/ risk perception for local communities and for the wider public should be

ID	Ref	Description	Inspectorate's comments
			<p>assessed and reported upon within the ES, where significant effects are likely.</p> <p>The Applicant's attention is drawn to the consultation response from the United Kingdom Health Security Agency in this regard (see Appendix 2 of this Opinion).</p>
3.10.4	n/a	Scope of assessment – vulnerable populations/ sensitive receptors	<p>The Inspectorate advises that, whilst an initial approach to the identification of sensitive receptors has been provided, through the health baseline, the impacts on health and wellbeing and health inequalities of the scheme may have particular impact on vulnerable or sensitive populations, including those that fall within the list of protected characteristics. These receptors should therefore be included in the scope of assessment.</p> <p>The Applicant's attention is drawn to the consultation response from the United Kingdom Health Security Agency in this regard (see Appendix 2 of this Opinion).</p>
3.10.5	n/a	Scope of assessment – physical activity and active travel/ access to open space	<p>The Scoping Report identifies potential significant effects due to the temporary loss or change in formal Public Rights of Way (PRoW) and the existing road network. The Applicant should complete a Walking, Cycling and Horse Riding Assessment, including information on the usage of each PRoW, bridleway, cycle route or the presence of non-motorised users on the highway.</p> <p>The assessment of affected routes should include the extent of vulnerable populations usage, sensitive locations and the presence or absence of walking and cycling infrastructure. Local consultation with the community is advised. In addition, the ES should include details of the PRoW management plan, including specific mitigation and enhancements proposed during the construction and operational phase of the scheme.</p>

ID	Ref	Description	Inspectorate's comments
			The Applicant's attention is drawn to the consultation response from the United Kingdom Health Security Agency in this regard (see Appendix 2 of this Opinion).

3.11 Traffic and Transport

(Scoping Report Section 14)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.11.1	Table 14.2	Assessment of operational impacts	<p>The Scoping Report states that operational traffic movements are not anticipated to have a material effect on the transport network and receptors, with no significant effects likely to occur.</p> <p>Having considered the nature and characteristics of the Proposed Development, the Inspectorate agrees that, subject to confirmation of the number and type of operational vehicle movements in the ES description of development, operational traffic movements are not likely to result in significant effects and that an assessment of this matter can be scoped out of the ES.</p>
3.11.2	Table 14.2	Assessment of decommissioning impacts	<p>The Scoping Report states that decommissioning of the Proposed Development is not predicted to result in a significant increase in traffic flows and significant effects, as it is anticipated that the pipelines will be left in situ.</p> <p>The Inspectorate considers that traffic movements associated with decommissioning of the buried pipelines are unlikely to result in significant effects and that an assessment of this matter can be scoped out of the ES. However, insufficient information has been provided regarding the location of AGIs to understand the scale and nature of effects during the decommissioning phase. Impacts from traffic movements during decommissioning of the AGIs should be assessed in the ES where significant effects are likely.</p>

ID	Ref	Description	Inspectorate's comments
3.11.3	Paragraph 14.6.11 and 14.6.12	Construction traffic	<p>The Inspectorate notes the potential for construction traffic to pass through residential areas. The Applicant should demonstrate that the route for construction traffic has considered the suitability of roads for HGVs, particularly those transporting AILs and that construction routes have been developed to avoid impacts on the local community where possible. Any mitigation measures required to facilitate the delivery of AILs should be detailed in the ES and any resultant likely significant effects assessed.</p> <p>The Applicant's attention is drawn to consultation responses from Ulceby Parish Council and Hull City Council in this regard (see Appendix 2 of this Opinion).</p>
3.11.4	Paragraph 14.8.3	Scope of assessment – traffic flows	<p>Whilst the Inspectorate notes references within the Scoping Report to Annual Average Daily Traffic (AADT) and 12 hour traffic flows, upon the assumption that some junction capacity assessments will be required, peak hour traffic flows survey information will also be required to support any traffic modelling to be undertaken in order to assess the impact of the Proposed Development. The Applicant's attention is drawn to the consultation response from Hull City Council in this regard (see Appendix 2 of this Opinion).</p>

3.12 Waste and Materials

(Scoping Report Section 15)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.12.1	Table 15.4	Other materials -construction phase	<p>The Applicant proposes to scope out this matter on the basis that other materials (not including excavated arisings) to be utilised for construction are not anticipated to impact on regional or national supplies and therefore no likely significant effects are expected.</p> <p>The Inspectorate is content with this approach.</p>
3.12.2	Table 15.4	Materials - operational phase	<p>The Applicant proposes to scope out this matter on the basis that limited quantities of materials are anticipated to be required and used during routine maintenance and repair.</p> <p>The Inspectorate is satisfied that significant effects are therefore not expected and agrees that this matter can be scoped out of further assessment.</p>
3.12.3	Table 15.4	Materials - decommissioning phase	<p>The Applicant proposes to scope out this matter on the basis that limited quantities of materials are anticipated to be used during decommissioning and not on a scale that will result in significant effects.</p> <p>The Inspectorate is satisfied that significant effects are therefore not expected and agrees that this matter can be scoped out of further assessment.</p>
3.12.4	Table 15.4	Waste - operational phase	<p>The Applicant proposes to scope out this matter on the basis that limited quantities of waste are anticipated to be generated during operation and not on a scale that will result in significant effects.</p>

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			The Inspectorate agrees that, on this basis, significant effects are unlikely and is therefore content that this matter can be scoped out of further assessment.
3.12.5	Table 15.4	Waste - decommissioning phase	<p>The Applicant proposes to scope out this matter on the basis that waste generation will be limited to removal of AGIs (for example concrete, metals, asphalts), the majority of which can be reused, recycled or recovered. In addition, the pipelines will be left in situ and no waste will be generated from their decommissioning.</p> <p>The Inspectorate agrees that, on this basis, the potential for significant effects would be unlikely and is therefore content that this matter can be scoped out of further assessment.</p>

ID	Ref	Description	Inspectorate's comments
3.12.6	n/a	n/a	n/a

3.13 Hydrology and Land Drainage

(Scoping Report Section 16)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.13.1	Table 16.2	Existing surface water abstractions and discharges – all phases	<p>The Applicant proposes to scope this matter out of further assessment on the basis that no new consumptive use of surface water resources is proposed, and safeguards will be put in place to protect surface water quality so there would be no impacts on the integrity of existing water interests.</p> <p>The Inspectorate agrees that, subject to no large volumes of dewatering needing to be undertaken, the potential for existing surface water features and surface and groundwater abstractions to be impacted upon and the potential for significant effects is unlikely. The Inspectorate is therefore content that this matter can be scoped out of further assessment on this basis.</p>
3.13.2	Table 16.2	Watercourses and waterbodies - operational and decommissioning phases	<p>The Applicant proposes to scope this matter out of further assessment on the basis that, once the land is reinstated, there would be no impact pathway. In addition, the banks and riparian corridors of watercourses would not be disturbed and there would be a suitable separation distance between channel beds and the crest of the buried pipelines.</p> <p>The Inspectorate agrees that, on this basis, the potential for significant effects is unlikely and is therefore content that this matter can be scoped out of further assessment.</p>
3.13.3	Table 16.2	Surface water quality - operational and decommissioning phases	<p>The Applicant proposes to scope this matter out of further assessment on the basis that no operational discharges of effluents would be generated that would be discharged to surface waters and a</p>

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			<p>suitable post construction land drainage scheme would also be implemented.</p> <p>The Inspectorate is content with this approach.</p>
3.134	Table 16.2	Flood risk from rivers, the sea and surface water; and effects on the land drainage regime (quantity and quality of flows) - decommissioning phase	<p>The Applicant proposes to scope these matters out of further assessment on the basis that the pipelines would remain in-situ, all AGIs would be removed and the land reinstated.</p> <p>The Inspectorate considers that works to remove AGIs during decommissioning may potentially take place within areas at risk of flooding. The impacts of these works will need to be assessed and mitigation measures put in place, as necessary.</p> <p>The Applicant's attention is drawn to the consultation response from the Environment Agency in this regard (see Appendix 2 of this Opinion).</p>
3.135	Table 16.2	Flood risk from other sources (groundwater, artificial sources) - all phases	<p>The Applicant proposes to scope this matter out of further assessment on the basis that there would be limited barriers to existing groundwater flow paths, due to the generally shallow excavations required in order to create the pipeline trenches and considers that the project is of low vulnerability to flooding from 'other' sources.</p> <p>The Inspectorate considers that, as artesian groundwater conditions are prevalent along sections of the corridor route, this matter should remain within the scope of assessment for all phases of the Proposed Development. There is potential for impact on groundwater flow pathways/ sub-surface flows and groundwater ingress into excavations. The Applicant's attention is drawn to the consultation response from the Environment Agency in this regard (see Appendix 2 of this Opinion).</p>

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.13.6	Table 16.2	Water quality and coastal processes in the intertidal zone - operational and decommissioning phases	<p>The Applicant proposes to scope this matter out of further assessment on the basis that once construction works are complete, all infrastructure in the intertidal zone would be buried to a suitable depth of cover and no operational discharges are proposed. The pipeline infrastructure would remain in-situ following project decommissioning. In addition, due to the eroding coastline and dynamic coastal processes in the intertidal zone, monitoring measures would be in place to ensure that the pipeline does not become exposed.</p> <p>The Inspectorate is satisfied that, subject to the inclusion of further details of relevant design and monitoring measures being provided within the PEIR and ES, this matter can be scoped out of further assessment.</p>

ID	Ref	Description	Inspectorate's comments
3.13.7	Paragraphs 16.4.1 - 16.4.2	Scope of assessment - study area	Justification should be provided with regards to the study area buffer of 500m from the boundary of the scoping route corridor, as there is the potential that the buffer may need to be increased in some cases to assess the full potential impact on receptors (e.g. where open cut watercourse crossings are being considered, because the impact may extend further). The Applicant's attention is drawn to the consultation response from the Environment Agency in this regard (see Appendix 2 of this Opinion).
3.13.8	Paragraph 16.8.2	Scope of assessment – open cut watercourse crossings	Any open cut watercourse crossings should be fully assessed in the ES where appropriate, due to the potential for impacts with regards to the hydrology and hydromorphology of WFD waterbodies within

ID	Ref	Description	Inspectorate's comments
			the study area. Details of the method of works and mitigation should be included.
3.13.9	n/a	Scope of assessment – future baseline	<p>The Applicant is advised to consider changes in land use and habitat along the route of the pipeline and in the vicinity of the AGIs in future years, as the area adapts to the impact of a changing climate. The implications of the installation of the pipelines on future land use change should be considered, including infrastructure improvements.</p> <p>The Applicant's attention is drawn to the consultation response from the Environment Agency in this regard (see Appendix 2 of this Opinion).</p>
3.13.10	n/a	Scope of assessment - washlands	<p>The proposed pipeline route passes over an uncontrolled washland near the River Aire. The Inspectorate advises that the ES should include information to demonstrate that the function of the washland would not be compromised by the construction of the Proposed Development. In addition, consideration must be given to whether there may be any impacts of having a pipeline under the washlands, for example through loading or future maintenance needs.</p> <p>The Applicant's attention is drawn to the consultation response from the Environment Agency in this regard (see Appendix 2 of this Opinion).</p>
3.13.11	n/a	Impacts from bentonite breakout	The ES should include consideration of the impacts from bentonite breakout during Horizontal Directional Drilling (HDD) works on aquatic environment receptors and water resource receptors.
3.13.12	n/a	Scope of assessment – Flood Risk Assessment (FRA)	The FRA underpinning the ES assessment should additionally cover matters including the effect that permanent ground raising or temporary mounds of soil in the floodplain could have on flood risk, the volumes of water displacement involved and mitigation measures where necessary and the landfall pits for the Humber tunnel and any

ID	Ref	Description	Inspectorate's comments
			<p>mitigation/ defences around the construction pits that may be required to prevent these from becoming flow routes when water levels in the Humber are high.</p> <p>In addition, capital projects near East Halton Skitter Beck to improve defences in the vicinity of the pipeline route on the south bank of the Humber should be considered, to ensure that the schemes will not interfere with each other. Potential impacts on the River Trent flood defence should be considered, as the proposed pipeline route crosses existing flood defences along this watercourse. Moreover, the Applicant is advised to consult with the relevant stakeholders with regards to the scope of future assessment work. The Applicant's attention is drawn to the consultation response from the Environment Agency in this regard (see Appendix 2 of this Opinion).</p> <p>With regard to published guidance on climate change allowances, the Inspectorate advises that the Environment Agency published revised peak rainfall allowances in May 2022, which should be used in the FRA.</p>

3.14 Major Accidents and Disasters

(Scoping Report Section 17)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.14.1	Appendix E	Construction phase accidents including dropped objects, heavy plant, temporary works, rock falls from tunnel boring and problems with machinery	<p>The Scoping Report states that the potential for accidents to occur during the construction process would be identified and dealt with through appropriate risk assessment and mitigation (as required to comply with UK health and safety legislation and environmental legislation) and through the CEMP.</p> <p>In view of the nature and characteristics of the Proposed Development, the Inspectorate is content that construction phase accidents including dropped objects, heavy plant, temporary works, rock falls from tunnel boring and problems with machinery would be addressed through appropriate construction working practices and are unlikely to lead to significant effects on the environment. These matters can be scoped out of the ES.</p>
3.14.2	Appendix E	Impact of construction phase activities on unexploded ordnance (UXO)	<p>The Scoping Report explains that the UXO hazard across the preliminary study area is low and that there are well developed construction industry practices which allow safe construction of thousands of projects each year in low hazard areas. The Inspectorate is content to scope out further assessment for areas of low risk.</p>
3.14.3	Appendix E	Construction traffic accidents	<p>The Scoping Report proposes to scope out the assessment of construction phase traffic accidents from the Major Accidents and Disasters ES Chapter. A full assessment of the impact on traffic would instead be presented in the Traffic and Transport ES Chapter.</p>

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			The Inspectorate is content with this approach but advises the Applicant to provide clear cross-referencing in the Major Accidents and Disasters ES aspect chapter to where the assessment is located.
3.14.4	Appendix E	Damage to existing utilities - construction phase	The Scoping Report states that existing utilities infrastructure would be identified and potential impacts mitigated as required, with the Proposed Development to be constructed around such infrastructure. The Inspectorate does not consider sufficient evidence has been provided to scope this matter out of the assessment. The ES Major Accidents and Disasters Chapter should assess impacts from damage to existing utilities during the construction phase (such as from intrusive works including excavation or piling) where significant effects are likely.
3.14.5	Appendix E	Impacts on aviation and from aircraft crashes -construction and operational phases	The Inspectorate has considered the nature and characteristics of the Proposed Development and the distance from the nearest airport (stated in the Scoping Report to be approximately 250m). The Inspectorate is content that the impacts of the Proposed Development on aviation or impacts from aircraft crashes are unlikely to result in significant effects. These matters can be scoped out of the ES.
3.14.6	Appendix E	Impacts on mines and storage caverns - construction and operational phases	The Scoping Report proposes to scope out the assessment of impacts on mines and storage caverns from the Major Accidents and Disasters ES Chapter. A full assessment of the impact on mines and storage caverns would instead be presented in the Geology and Hydrology ES Chapter. The Inspectorate is content with this approach but advises the Applicant to provide clear cross-referencing in the Major Accidents and Disasters ES aspect chapter to where the assessment is located.
3.14.7	Appendix E	Impacts on transport networks, from transport networks and from	Appendix E of the Scoping Report states that crossings of the rail network would use trenchless techniques, whereas <i>"it is anticipated"</i>

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
		rail accidents - construction and operational phases	<p>that other transport networks would be crossed using trenchless techniques. The pipeline at a crossing point would be designed such that it would be protected from any road or rail accidents. Pipeline crossings of railways and major roads would be subject to approval by the relevant network authority.</p> <p>Regarding construction, on the basis that crossings of the rail network would use trenchless techniques, the Inspectorate is content that impacts from rail accidents are not likely to result in significant effects in terms of major accidents and disasters and agrees that these matters can be scoped out. For crossings of other transport networks, the Inspectorate notes that the use of trenchless techniques for crossings is anticipated but not confirmed at this stage. For any crossings not subject to trenchless techniques, the ES should assess any impacts on and from the transport network from the risk of major accidents and disasters during construction which are likely to result in significant effects. For crossings subject to trenchless techniques, the Inspectorate is content that impacts on the transport network and from the transport network are not likely to result in significant effects in terms of major accidents and disasters and agrees that this matter can be scoped out.</p> <p>Regarding operation, as the pipelines would be a buried feature, the Inspectorate considers that impacts on the transport network, from the transport network and from rail accidents are not likely to result in significant effects in terms of major accidents and disasters and agrees that these matters can be scoped out.</p>
3.14.8	Appendix E	Impacts on watercourses - construction and operational phases	<p>Appendix E of the Scoping Report states "<i>it is anticipated</i>" that major rivers and canals would be crossed using trenchless techniques.</p> <p>Regarding construction, the Inspectorate notes that the use of trenchless techniques for crossings is anticipated but not confirmed at</p>

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			<p>this stage. For any crossings not subject to trenchless techniques, the ES should assess any impacts on watercourses during construction which are likely to result in significant effects in terms of major accidents and disasters. For crossings subject to trenchless techniques, the Inspectorate is content that impacts on watercourses are not likely to result in significant effects in terms of major accidents and disasters and agrees that this matter can be scoped out.</p> <p>Regarding operation, as the pipelines would be a sealed and buried feature, the Inspectorate considers that impacts on watercourses are not likely to result in significant effects in terms of major accidents and disasters and agrees that this matter can be scoped out.</p>
3.14.9	Appendix E	Impact on intertidal areas - construction and operational phases	<p>The proposed pipelines would need to cross two intertidal areas, the River Humber and the Holderness Coast. The Scoping Report explains that the River Humber would be crossed using trenchless techniques and proposes to scope out the assessment of impacts on the Holderness Coast from the Major Accidents and Disasters ES Chapter. An assessment of the impacts on the Holderness Coast would instead be presented in the Biodiversity and Hydrology and Land Drainage ES Chapters.</p> <p>Regarding construction, on the basis that the River Humber is crossed utilising trenchless techniques, the Inspectorate is content that impacts on the River Humber intertidal area are not likely to result in significant effects in terms of major accidents and disasters and agrees that this matter can be scoped out. The Inspectorate is content with the approach to present the assessment of impacts to the Holderness Coast intertidal area in the Biodiversity and Hydrology and Land Drainage ES Chapters, but advises the Applicant to provide</p>

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			<p>clear cross-referencing in the Major Accidents and Disasters ES aspect chapter to where the assessment is located.</p> <p>Regarding operation, as the pipeline would be a sealed and buried feature, the Inspectorate considers that impacts on intertidal areas are not likely to result in significant effects in terms of major accidents and disasters and agrees that this matter can be scoped out.</p>
3.14.10	Appendix E	Leaks and spills - construction and operational phases	<p>The Scoping Report seeks to scope out impacts from leaks and spills from the Major Accidents and Disasters ES Chapter. The Inspectorate notes that these matters will be considered elsewhere in the ES and is satisfied that they can be scoped out of the Major Accidents and Disasters ES Chapter.</p>
3.14.11	Appendix E	Accidents during maintenance	<p>In view of the nature and characteristics of the Proposed Development, the Inspectorate is content that accidents during maintenance are not likely to lead to significant effects on the environment and agrees this matter can be scoped out of the ES.</p>
3.14.12	Appendix E	Structural collapse of assets – operational phase	<p>The Scoping Report explains that structural collapse will be prevented through compliance with appropriate codes and standards, and the application of good practice in structural design. Considering this, together with the nature and characteristics of the Proposed Development and that ground stability issues are to be addressed as part of the assessment of Geology and Hydrology (Chapter 8 of the Scoping Report), the Inspectorate is content that further consideration of structural collapse of Proposed Development assets can be scoped out.</p>

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			The ES should clearly set out the relevant codes and standards that have been adopted for the design of the pipeline route and the degree to which these have been agreed with relevant regulators.
3.14.13	Appendix E	Decommissioning activities	<p>Paragraph 17.8.3 of the Scoping Report identifies potential significant effects in terms of major accidents and disasters resulting from decommissioning. Appendix E then goes on to state that the potential for major accidents and disasters to occur during decommissioning will be identified and addressed through appropriate risk assessment and mitigation measures (as required to comply with UK health and safety and environmental legislation) and through the DEMP.</p> <p>In view of the potential likely significant effects identified in paragraph 17.8.3 of the Scoping Report, the Inspectorate does not agree that an assessment of impacts during decommissioning can be scoped out of the Major Accidents and Disasters ES Chapter. The ES Major Accidents and Disasters Chapter should assess impacts from decommissioning where significant effects are likely.</p>
3.14.14	Appendix E	External nuclear major accidents - construction and operational phases	Having considered the nature and characteristics of the Proposed Development and the distance from nuclear sites, the Inspectorate is content that risks to the Proposed Development from accidents at nuclear sites can be scoped out.
3.14.15	Appendix E	<ul style="list-style-type: none"> ▪ Loss of utilities; ▪ Terrorism; ▪ Widespread public disorder; ▪ Biological threats; ▪ Lightning; ▪ Seismic; and 	Based on the reasoning and evidence presented in the Scoping Report, the Inspectorate is content that risks to or from the Proposed Development from these matters are not likely to result in significant effects. These matters can be scoped out of the assessment.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
		<ul style="list-style-type: none"> ▪ Space weather. 	
3.14.16	Appendix E	Extreme weather conditions	<p>The Scoping Report seeks to scope out impacts from extreme weather conditions as a separate matter from the Major Accidents and Disasters ES Chapter. The assessments would instead be presented in the Climate ES Chapter.</p> <p>The Inspectorate is content with this approach but advises the Applicant to provide clear cross-referencing in the Major Accidents and Disasters ES aspect chapter to where the assessments are located.</p>
3.14.17	Appendix E	<ul style="list-style-type: none"> ▪ Dam/ reservoir breaches; ▪ Flood risk; and ▪ Coastal erosion and landslides. 	<p>The Scoping Report seeks to scope out impacts from dam/ reservoir breaches, flood risk and coastal erosion and landslides from the Major Accidents and Disasters ES Chapter. The assessments would instead be presented in the Hydrology and Land Drainage ES Chapter.</p> <p>The Inspectorate is content with this approach but advises the Applicant to provide clear cross-referencing in the Major Accidents and Disasters ES aspect chapter to where the assessments are located.</p>

ID	Ref	Description	Inspectorate's comments
3.14.18	n/a	n/a	n/a

APPENDIX 1: CONSULTATION BODIES FORMALLY CONSULTED

TABLE A1: PRESCRIBED CONSULTATION BODIES²

SCHEDULE 1 DESCRIPTION	ORGANISATION
The Health and Safety Executive	Health and Safety Executive
The National Health Service Commissioning Board	NHS England
The relevant Clinical Commissioning Group	NHS Lincolnshire Clinical Commissioning Group
	NHS East Riding of Yorkshire Clinical Commissioning Group
	NHS North Lincolnshire Clinical Commissioning Group
	NHS Vale of York Clinical Commissioning Group
Natural England	Natural England
The Historic Buildings and Monuments Commission for England	Historic England
The relevant fire and rescue authority	Humberside Fire and Rescue Service
	Lincolnshire Fire and Rescue
	North Yorkshire Fire and Rescue
The relevant police and crime commissioner	Humberside Police and Crime Commissioner
	Lincolnshire Police and Crime Commissioner
	North Yorkshire Police and Crime Commissioner

² Schedule 1 of The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 (the 'APFP Regulations')

SCHEDULE 1 DESCRIPTION	ORGANISATION
<p>The relevant parish council(s) or, where the application relates to land [in] Wales or Scotland, the relevant community council</p>	Barnetby le Wold Parish Council
	Keadby with Althorpe Parish Council
	Kirmington Parish Council
	Paull Parish Council
	Thorngumbald Parish Council
	Welwick Parish Council
	Easington Parish Council
	Swinefleet Parish Council
	Reedness Parish Council
	Twin Rivers Parish Council
	Goole Fields Parish Council
	East Butterwick Parish Council
	Belton Parish Council
	Messingham Parish Council
	Hibaldstow Parish Council
	West Butterwick Parish Council
	Manton Parish Council
	Scawby Parish Council
	Cadney cum Howsham Parish Council
	Crowle and Ealand Parish Council
Eastoft Parish Council	
Broughton Parish Council	
Wootton Parish Council	
Thornton Curtis Parish Council	
Ulceby Parish Council	

SCHEDULE 1 DESCRIPTION	ORGANISATION
	North Killingholme Parish Council
	East Halton Parish Council
	Goxhill Parish Council
	Skeffling Parish Council
	Rawcliffe Parish Council
	Airmyn Parish Council
	Preston Parish Council
	Ottringham Parish Council
	Burstwick Parish Council
	Halsham Parish Council
	Burton Pidsea Parish Council
	Patrington Parish Council
	Rimswell Parish Council
	Hedon Parish Council
	Hollym Parish Council
	Holmpton Parish Council
	Long Drax Parish Council
	Bigby Parish Council
	Somerby Parish Council
	Barlow Parish Council
	Newland Parish Council
	Drax Parish Council
The Environment Agency	The Environment Agency
The Maritime and Coastguard Agency	Maritime & Coastguard Agency
The Marine Management Organisation	Marine Management Organisation (MMO)

SCHEDULE 1 DESCRIPTION	ORGANISATION
The Civil Aviation Authority	Civil Aviation Authority
Integrated Transport Authorities (ITAs) and Passenger Transport Executives (PTEs)	South Yorkshire Passenger Transport Executive
The Relevant Highways Authority	North Yorkshire County Council Highways Authority
	Lincolnshire County Council Highways Authority
	North Lincolnshire Council Highways Authority
	East Riding of Yorkshire Council Highways Authority
The relevant strategic highways company	National Highways
The Coal Authority	The Coal Authority
The relevant internal drainage board	Reedness and Swinefleet Drainage Board
	Ouse and Derwent Internal Drainage Board
	Ouse and Humber Drainage Board
	Selby Area Internal Drainage Board
	South Holderness Internal Drainage Board
	North East Lindsey Drainage Board
	Ancholme Internal Drainage Board
	Doncaster East Internal Drainage Board
	Dempster Internal Drainage Board
	Goole and Airmyn Internal Drainage Board
	Goole Field District Drainage Board

SCHEDULE 1 DESCRIPTION	ORGANISATION
	Scunthorpe and Gainsborough Water Management Board
	Thorntree Internal Drainage Board
	Rawcliffe Internal Drainage Board
	Isle of Axholme and North Nottinghamshire Water Level Management Board
The Canal and River Trust	The Canal and River Trust
Trinity House	Trinity House
United Kingdom Health Security Agency, an executive agency of the Department of Health and Social Care	United Kingdom Health Security Agency
Relevant statutory undertakers	See Table A2 below
The Crown Estate Commissioners	The Crown Estate
The Forestry Commission	The Forestry Commission
The Secretary of State for Defence	Ministry of Defence

TABLE A2: RELEVANT STATUTORY UNDERTAKERS³

STATUTORY UNDERTAKER	ORGANISATION
The relevant Clinical Commissioning Group	NHS Vale of York Clinical Commissioning Group
	NHS North Lincolnshire Clinical Commissioning Group
	NHS Lincolnshire Clinical Commissioning Group
	NHS East Riding of Yorkshire Clinical Commissioning Group

³ 'Statutory Undertaker' is defined in the APFP Regulations as having the same meaning as in Section 127 of the Planning Act 2008 (PA2008)

STATUTORY UNDERTAKER	ORGANISATION
The National Health Service Commissioning Board	NHS England
The relevant NHS Trust	Yorkshire Ambulance Service NHS Trust
	East Midlands Ambulance Service NHS Trust
Railways	Network Rail Infrastructure Ltd
	Highways England Historical Railways Estate
Canal Or Inland Navigation Authorities	The Canal and River Trust
Dock and Harbour authority	Associated British Ports
Civil Aviation Authority	Civil Aviation Authority
Licence Holder (Chapter 1 Of Part 1 Of Transport Act 2000)	NATS En-Route Safeguarding
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	Anglian Water
	Severn Trent
	Yorkshire Water
The relevant public gas transporter	Cadent Gas Limited
	Last Mile Gas Ltd
	Energy Assets Pipelines Limited
	ES Pipelines Ltd
	ESP Networks Ltd
	ESP Pipelines Ltd
	ESP Connections Ltd
	Fulcrum Pipelines Limited

STATUTORY UNDERTAKER	ORGANISATION
	Harlaxton Gas Networks Limited
	GTC Pipelines Limited
	Independent Pipelines Limited
	Indigo Pipelines Limited
	Leep Gas Networks Limited
	Murphy Gas Networks limited
	Quadrant Pipelines Limited
	Squire Energy Limited
	National Grid Gas Plc
	Scotland Gas Networks Plc
	Southern Gas Networks Plc
	Northern Gas Networks Limited
The relevant electricity generator with CPO Powers	Keadby Developments Limited and Keadby Generation Limited
	Drax Power Limited
	Hornsea Offshore Wind Farm Zone 4 - Orstead Hornsea Project Four Limited
	Killingholme Power Station - Uniper UK Limited
	C.Gen Killingholme Limited
	Saltend Cogeneration Company Limited
	Centrica KPS Limited
The relevant electricity distributor with CPO Powers	Eclipse Power Network Limited
	Energy Assets Networks Limited
	ESP Electricity Limited
	Forbury Assets Limited

STATUTORY UNDERTAKER	ORGANISATION
	Fulcrum Electricity Assets Limited
	Harlaxton Energy Networks Limited
	Independent Power Networks Limited
	Indigo Power Limited
	Last Mile Electricity Ltd
	Leep Electricity Networks Limited
	Murphy Power Distribution Limited
	The Electricity Network Company Limited
	UK Power Distribution Limited
	Utility Assets Limited
	Vattenfall Networks Limited
	Northern Powergrid (Northeast) Limited
	Northern Powergrid (Yorkshire) plc
The relevant electricity transmitter with CPO Powers	National Grid Electricity Transmission Plc
	National Grid Electricity System Operator Limited

TABLE A3: SECTION 43 LOCAL AUTHORITIES (FOR THE PURPOSES OF SECTION 42(1)(B))⁴

LOCAL AUTHORITY⁵
West Lindsey District Council
Selby District Council
East Riding of Yorkshire Council
North Lincolnshire Council
North Yorkshire County Council
Lincolnshire County Council
North Kesteven District Council
City of Lincoln Council
Bassetlaw District Council
Newark and Sherwood District Council
East Lindsey District Council
Scarborough District Council
Harrogate Borough Council
Ryedale District Council
North East Lincolnshire Council
Hull City Council
Leeds City Council
Wakefield Council
Doncaster Council
City of York Council
Nottinghamshire County Council

⁴ Sections 43 and 42(B) of the PA2008

⁵ As defined in Section 43(3) of the PA2008

LOCAL AUTHORITY⁵
Yorkshire Dales National Park Authority
North Yorkshire Moors National Park Authority
Middlesbrough Council
Redcar and Cleveland Borough Council
Rutland Borough Council
North Northamptonshire Borough Council
County Durham Council
City of Bradford Metropolitan District Council
Peterborough City Council
Darlington Borough Council
Stockton-on-Tees Borough Council
Cambridgeshire County Council
Cumbria County Council
Norfolk County Council
Lancashire County Council
Leicestershire County Council

TABLE A4: NON-PRESCRIBED CONSULTATION BODIES

ORGANISATION
Royal National Lifeboat Institution
Brocklesby Parish Meeting
Searby cum Ownby Parish Meeting

APPENDIX 2: RESPONDENTS TO CONSULTATION AND COPIES OF REPLIES

CONSULTATION BODIES WHO REPLIED BY THE STATUTORY DEADLINE:
Bassetlaw District Council
Burstwick Parish Council
Cadney cum Howsham Parish Council
Cambridgeshire County Council
Canal and River Trust
City of Bradford Metropolitan District Council
Durham County Council
East Riding of Yorkshire Council
Environment Agency
ESP
Halsham Parish Council
Harrogate Borough Council
Health and Safety Executive
Highways England Historical Railways Estate
Historic England
Hull City Council
Keadby Developments Ltd/ Keadby Generation Ltd
Killingholme Power Station - Uniper UK Limited
Maritime and Coastguard Agency
Ministry of Defence
National Grid Electricity Transmission Plc
National Grid Gas Plc

Newark and Sherwood District Council
North East Lindsey Internal Drainage Board
North Lincolnshire Council
North Yorkshire County Council (joint response with Selby District Council)
Northern Gas Networks
Redcar and Cleveland Borough Council
Royal Mail Group
Saltend Cogeneration Company Ltd
Selby District Council (joint response with North Yorkshire County Council)
Somerby Parish Council
South Holderness Internal Drainage Board
Stockton-on-Tees Borough Council
The Forestry Commission
Trinity House
Ulceby Parish Council
United Kingdom Health Security Agency
Wakefield Council
West Lindsey District Council



Bassetlaw
DISTRICT COUNCIL
— North Nottinghamshire —

Ms Emily Parker
Planning Inspectorate
Environmental Services
Central Operations
Temple Quay House
2 The Square
Bristol, BS1 6PN

Our Ref: 22/00537/PREAPP
Your Ref: EN070006
Officer: Daniel Galpin
Email: planning@bassetlaw.gov.uk

4th May 2022

Dear Ms Parker,

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

Application by National Grid Carbon Limited (the Applicant) for an Order granting Development Consent for the Humber Low Carbon Pipeline project (the Proposed Development)

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

I refer to your recent consultation letter, dated 12th April regarding the above scoping consultation for the Humber Low Carbon Pipeline Project.

Having reviewed the location of the proposed development and associated documents, due to the project been located a considerable distance from the border with Nottinghamshire, it is not considered that the proposed development would have any material impact on our Local Authority area.

It is therefore our view that a full response is not necessary due to the lack of material impacts or geographical proximity with Bassetlaw.

Yours faithfully,



John Krawczyk
Development Team Manager

Feekins-Bate, Laura

From: [REDACTED]
Sent: 01 May 2022 19:31
To: Humber Low Carbon Pipelines
Subject: Your ref EN070006

Dear Sir / Madam

Thank you for your recent correspondence regarding Humber Low Carbon Pipelines. The information was circulated to all councillors and placed on the agenda for discussion.

I can confirm 'no comments' were raised the meeting and the correspondence was duly noted.

Kind regards

KL Dawson

Kerri Dawson
Clerk to Burstwick Parish Council

E: [REDACTED]
[REDACTED] Tues & Thurs 9am - 3pm
W: www.burstwickpc.co.uk

Feekins-Bate, Laura

From: clerk@cadneycumhowsham.org.uk
Sent: 28 April 2022 09:36
To: Humber Low Carbon Pipelines
Subject: RE: EN070006 - Humber Low Carbon Pipeline - EIA Scoping Notification and Consultation

Hello Laura,

Under the minute 2204/16 of Cadney Cum Howsham Parish Council in April 2022, the Council resolved to note the consultation as recieved wishes to confirm that they have no further comments.

James Truepenny Clerk to Cadney Cum Howsham Parish Council This e-mail expresses the opinion of the author and is not necessarily the view of Cadney Cum Howsham Parish Council. Please be aware that anything included in an e-mail may have to be disclosed under the Freedom of Information Act and cannot be regarded as confidential. This communication is intended for the addressee(s) only. Please notify the sender if received in error. All Email is monitored and recorded.

-----Original Message-----

From: "Humber Low Carbon Pipelines" <HumberLowCarbon@planninginspectorate.gov.uk>
Sent: Tuesday, 12 April, 2022 11:04
To:
Cc: "Humber Low Carbon Pipelines" <HumberLowCarbon@planninginspectorate.gov.uk>
Subject: EN070006 - Humber Low Carbon Pipeline - EIA Scoping Notification and Consultation

Dear Sir/ Madam

Please see attached correspondence on the proposed Humber Low Carbon Pipeline project.

Please note that the deadline for consultation responses is **Tuesday 10 May 2022**, and is a statutory requirement that cannot be extended.

Kind regards
Laura



Laura Feekins-Bate | EIA Advisor
The Planning Inspectorate

**The Planning
Inspectorate**

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DPC:76616c646f72



My ref: Humber Low Carbon Pipeline (EN070006)
Your ref: EN070006
Date: 10 May 2022



Contact: Matthew Breeze
Telephone:
E Mail: PlanningDC@cambridgeshire.gov.uk

Ms Emma Cottam
The Planning Inspectorate
2 The Square
Bristol, BS1 6PN
by e-mail only

Steve Cox,
Executive Director
Place and Economy
Planning Growth & Environment



Dear Ms Cottam,

EN070006 - HUMBER LOW CARBON PIPELINE

Thank you for consulting Cambridgeshire County Council, in its role as an adjoining Minerals and Waste Planning Authority (MWPA), on the above scoping consultation. Having reviewed the available documentation, the MWPA has no comments at this time.

If you have any questions regarding this response, please contact me on the details above.

Yours sincerely

Matthew Breeze
Principal Planning Officer



**Canal &
River Trust**

Making life better by water

Secretary of State
The Planning Inspectorate
Environmental Services
Temple Quay House
2 The Square
Bristol
BS1 6PN

Your Ref EN070006

Our Ref IPP-153

Monday 9th May 2022

BY EMAIL ONLY Humberlowcarbon@planninginspectorate.gov.uk

Dear Sirs

EN070006 Humber Low Carbon Pipeline Project

Thank you for your consultation on the Environmental Impact Assessment Scoping for the above project.

We are 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.

Having reviewed the location of the proposed project and the Scoping Report, we wish to make the following comments:

The proposed pipeline would cross the Trust's network in two locations, where we are both landowner and Navigation Authority:

- The Aire & Calder Navigation east of Rawcliffe Bridge; and
- The Stainforth & Keadby Canal west of Keadby.

It would also pass in close proximity to the River Ouse at Drax, where the Trust are Navigation Authority.

We wish to make the following comments in respect of the scoping report.

Ecology and Biodiversity

The crossing of our network has the potential to impact upon habitats associated with our waterway. This would include any impact from vibrations from any drilling works below (as identified in paragraph 6.8.2), or any severance of habitat corridors resulting from construction compounds in proximity to the waterspace.

We request that the chapter should specifically identify water courses and canals as a receptor that could be impacted by the works.

The potential impacts of construction works have been identified within the report. We request that any final report should, however, make explicit mention of the potential impact of works on wildlife corridors.

Canal & River Trust

Fradley Junction, Alrewas, Burton-upon-Trent, Staffordshire DE13 7DN

T 0303 040 4040 E canalrivertrust.org.uk/contact-us W canalrivertrust.org.uk

Landscape and Visual Impact Assessment (LVIA)

Chapter 10 advises that a LVIA will be carried out.

We request that consideration is given towards waterway users within the list of receptors in section 10.5. We note that the list of receptors include 'people engaged in outdoor sport and recreation'. However, this terminology is vague. Due to the likely proximity of works to our waterways, we request that towpaths, waterways and marinas should be recognised as visual receptors in the LVIA, as that any impact towards them can be fully assessed.

Table 10.1 makes note that a number of representative views would be provided along the route. We request that this should cover the two network crossings and a view of pipeline from the River Ouse's outward perspective. This would enable a full assessment to be carried out upon the visual impact from our waterways, which would be in the interests of protecting the waterways visual amenity, setting and promoting beauty on the door step.

Paragraph 10.7.1 highlights that efforts will be taken to sympathetically set out site construction compounds, with consideration given to the restoration of areas of temporary works. We request that the Trust is kept informed by the applicant of any siting and activities in proximity to our waterways, so that any visual impacts upon our network from these can be fully assessed and mitigated against. Associated fencing, compound buildings and any significant engineering operations could impact upon the outward appearance of our waterways, and we request that this is considered as part of the final design and establishment of works.

The submitted documents indicate that new pipework would be sited underground. This approach would help to minimise any impact on the visual appearance of our waterway corridors, and is preferred by the Trust in principle to any above-waterway routing via pipe bridge. It would also minimise any potential harm to navigation that could be caused through the positioning of cables above navigable channels.

Should the scheme be amended to incorporate above ground crossings, then we advise that the Scoping Report would need to be amended to ensure that the visual impacts of the pipework would be considered and mitigated for. Consideration would also be required with regards to the impact on Navigation Clearance.

Noise and Vibration Risks

We wish to highlight that works to install a pipelines below our waterways, as suggested in the scoping document, would need to be carefully managed to avoid any significant vibration or loading that could adversely impact the stability of the canal or river banks above.

We request that methodology and associated risk mitigation details should be submitted prior to the commencement of development on site. We advise that this information should be incorporated into the EIA. In chapter 11, the existing scoping report highlights that Noise and Vibration assessments will focus upon impacts to sensitive receptors, such as residential property. We request that this should be expanded so that any risk to the banks of the Ouse, Aire & Calder Navigation or Stainforth & Keadby Canal, including existing stone and piled wash walls, are fully assessed.

We believe this is necessary to address the risk of land instability in line with the aims of paragraph 183 from the National Planning Framework.

Impacts to Our Waterways During Construction

We wish to advise the applicant that the construction of our waterways, notably existing deep structural sheet piling on both waterways, may result in complications for the construction of pipelines below our waterways.

Canal & River Trust

Fradley Junction, Alrewas, Burton-upon-Trent, Staffordshire DE13 7DN

T 0303 040 4040 E canalrivertrust.org.uk/contact-us W canalrivertrust.org.uk

The applicant is therefore strongly advised to first contact the Trust to provide advise on the exact location of any directional drilling that may be proposed so that we can assess if the proposal is feasible and practical. Appropriate investigations, including bore holes, may be required to ascertain the exact ground conditions and depth of existing piling.

The Trust advise that any directional drilling below our network should seek to be a minimum of 3.5m in depth from bottom of canal bed to top of the pipe (the exact distance can depend on settlement during construction works).

In our capacity as landowner, we wish to advise that the applicant would be required to comply with the Trust's 'Code of Practice for Works affecting the Canal & River Trust'. The applicant/developer is advised to contact the Canal & River Trust's Works Engineering Team via switchboard on 0303 040 4040 should they have any questions, require further information upon the Code, or seek clarification over the feasibility of pipeline routing below our network.

Other Comments

The applicant is advised that the Trust is not a land drainage authority and any surface water discharge to our waterways will require prior consent from the Trust. Such discharges are not granted as of right and when and if they are granted they will usually be subject to completion of a commercial agreement prior to the commencement of any development.

Landowner consent would be required for the installation of a new cable below our waterways, due to the Trust's land ownership. The applicant is advised to contact the Trust's Utilities section at utilitiesenquiry@canalrivertrust.org.uk for further advice.

Please note that the Canal & River Trust is a statutory undertaker which has specific duties to protect the waterways. Accordingly, it is likely that we will resist the use of compulsory purchase powers which may affect our land or undertakings. We reserve the right to seek protections under S16 of the Acquisition of Land Act 1981 should any proposals affect land which has been acquired for the purposes of our undertaking.

Accordingly, we require that the acquisition of any Trust land or rights over Trust land should be secured by agreement.

Yours Sincerely

Simon Tucker MRTPI
Area Planner – Yorkshire and North East


Fradley Junction, Alrewas, Burton-upon-Trent, Staffordshire, DE13 7DN

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

Canal & River Trust

Fradley Junction, Alrewas, Burton-upon-Trent, Staffordshire DE13 7DN
T 0303 040 4040 E canalrivertrust.org.uk/contact-us W canalrivertrust.org.uk

Application No: 22/01684/CON

CONNO

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

**National Grid Carbon Limited
C/O The Planning Inspectorate
Environmental Services
Central Operations
Temple Quay House
2 The Square
Bristol
BS1 6PN**

Consultation Response – No Objection

Proposal: Consultation from Planning Inspectorate: re Development Consent for the Humber Low Carbon Pipeline project (the Proposed Development)

Location: Humber Low Carbon Pipeline

Applicant: National Grid Carbon Limited

City of Bradford Metropolitan District Council has **NO OBJECTION** to the above planning application.

Feekins-Bate, Laura

From: [REDACTED]
Sent: 22 April 2022 12:18
To: Humber Low Carbon Pipelines
Subject: Scoping Consultation Response

Dear Ms Cottam

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

Application by National Grid Carbon Limited (the Applicant) for an Order granting Development Consent for the Humber Low Carbon Pipeline project (the Proposed Development)

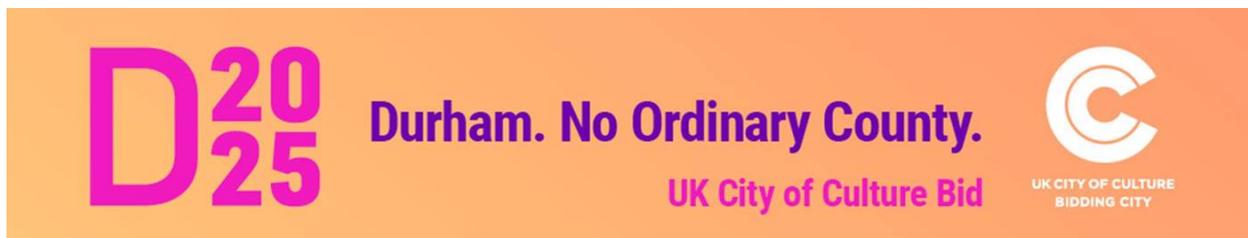
Scoping consultation and notification of the Applicant’s contact details and duty to make available information to the Applicant if requested

Thank you for your recent consultation regarding the above. I can confirm that Durham County Council has no comments or additional information to provide in relation to this matter.

Regards

Chris Shields

Senior Planning Officer | Strategic Planning Team | Durham County Council | County Hall | Durham | DH1 5UL
Tel. [REDACTED]



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Feekins-Bate, Laura

From: [REDACTED]
Sent: 21 April 2022 16:25
To: Humber Low Carbon Pipelines
Cc: James Chatfield; Planning
Subject: Re: EN070006 - Humber Low Carbon Pipeline - EIA Scoping Notification and Consultation
Attachments: HLCP - Statutory consultation letter.pdf

Good Afternoon

Thank you for your email regarding the above.

I can confirm that the EIA Scoping Opinion document has been carefully considered. It appears a thorough detailed document with appropriate matters scoped into the Environmental Statement (ES) that will be submitted as part of a future Development Consent Order (DCO) application.

Consequently, I can confirm no comments on behalf of East Riding of Yorkshire Council.

Kind Regards

Matthew Sunman
Principal Planning Officer - Minerals and Waste

[REDACTED]
CertHE, MPhysGeog (Hons), MSc Urban and Regional Planning,
MRTPI

From: Humber Low Carbon Pipelines <HumberLowCarbon@planninginspectorate.gov.uk>
Sent: Tuesday, April 12, 2022 11:11 AM
To: Planning <planning@eastriding.gov.uk>
Cc: [REDACTED]; Humber Low Carbon Pipelines <HumberLowCarbon@planninginspectorate.gov.uk>
Subject: EN070006 - Humber Low Carbon Pipeline - EIA Scoping Notification and Consultation

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Dear Sir/ Madam

Please see attached correspondence on the proposed Humber Low Carbon Pipeline project.

Please note that the deadline for consultation responses is **Tuesday 10 May 2022**, and is a statutory requirement that cannot be extended.

Kind regards
Laura



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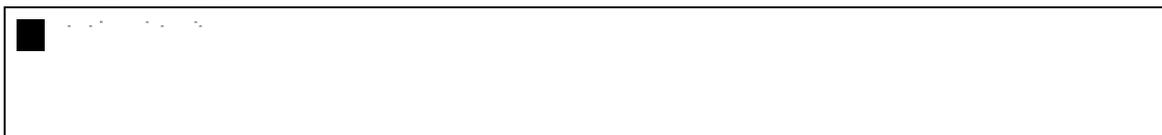
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DPC:76616c646f72



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Emma Cottam
Planning Inspectorate
Environmental Services
Central Operations
Temple Quay House
2 The Square
Bristol
BS1 6PN

Our ref: AN/2022/133014/01-L01
Your ref: EN070006
Date: 09 May 2022

By email only to: humberlowcarbon@planninginspectorate.gov.uk

Dear Ms Cottam

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

Application by National Grid Carbon Limited (the Applicant) for an Order granting Development Consent for the Humber Low Carbon Pipeline project (the Proposed Development): Humber Region

We have reviewed the Humber Low Carbon Pipelines Environmental Impact Assessment (EIA) Scoping Report, April 2022, undertaken by Arcadis and have the following comments to make on issues that fall within the Environment Agency's remit.

Chapter 2 Project Description

2.8.18: Further thought may need to be given to the proposal for dealing with backfill materials, given the volume of the pipe. Waste disposal permits may be required.

2.8.24 & 2.8.25: We note that 'major watercourses (e.g. the River Trent) will be crossed using trenchless techniques' and 'crossings of minor watercourses, including rivers, streams and ditches, would typically use open cut techniques'. Our strong preference is for all main rivers to be crossed using trenchless techniques and we would welcome confirmation of this.

2.8.31: The material coming out of the tunnel under the Humber is likely to need to be treated in some way before going for re-use or landfill; an environmental permit from the Environment Agency will be needed.

Chapter 3 EIA Methodology

3.6.5 Protective provisions:

We would welcome early notification from the applicant of their wishes regarding

disapplication of relevant legislation to allow discussion of protective provisions.

Under the Environmental Permitting (England and Wales) Regulations 2016, permission must be obtained from the Environment Agency for any proposed activities which will take place:

- in, over, under or within 8 metres of a main river (16 metres if tidal)
- on or within 8 metres of a flood defence structure or culvert (16 metres if tidal)
- on or within 16 metres of a sea defence
- within 16 metres of any main river, flood defence (including a remote defence) or culvert for quarrying or excavation
- in a flood plain more than 8 metres from the river bank, culvert or flood defence structure (16 metres if tidal) if planning permission has not already been granted for the works

Further guidance and advice is available on our website:

<https://www.gov.uk/guidance/flood-risk-activities-environmental-permits>.

Environmental Permitting for flood risk activities could be a complex issue, and one that needs to be considered upfront. Whether or not disapplication is pursued, the permitting work will need significant consideration. Therefore, it may be prudent to give environmental permitting its own line within table 16.1. A joint meeting with Environment Agency staff covering the relevant geographical areas may be advisable, with legal representation, to understand how best to approach the permits required to undertake the work.

In addition, the Humber Estuary is not classed as a main river. This means we would require detailed information on the launch and reception pits and any interactions with our defences to ensure there would be no increase in flood risk. However, there may also be interactions with the marine licensing regime; it would therefore be good to clarify this at the earliest opportunity, so everyone is clear on what does and does not need permitting and who will lead on it.

3.6.6: We welcome the proposal to secure best practice and mitigation actions within the Construction and Decommissioning and Environmental Management Plans and ask to review these when available.

3.6.9: We are pleased to note that monitoring will be undertaken, as summarised in this paragraph.

3.11.5: We also welcome the proposed scope of the Water Framework Directive Screening Report and ask to be consulted on this when available.

3.11.8 (Flood risk assessment): We welcome the acknowledgement that the site lies in an area which is at risk of flooding and therefore the Development Consent Order application needs to be supported by a flood risk assessment (FRA). Please see additional comments below with reference to paragraph 16.2.7.

Chapter 5 Air Quality

5.8.4: states:

'There may be venting of carbon dioxide and hydrogen from above ground installations (AGIs) during maintenance works; however, these would be infrequent and temporary in nature and therefore negligible in terms of air quality

impacts and significance. There are no other operational phase emissions sources or air quality impacts associated with the Project anticipated for inclusion in the air quality assessment.'

We ask the applicant to confirm that flaring of hydrogen will not be required when depressurising the high pressure hydrogen pipeline for maintenance or any other purposes at the AGIs or anywhere else on the network. If flaring is required, they should consider whether this should be assessed as part of the air quality impact study.

Chapter 6 Ecology and Biodiversity

We are happy with the level of detail given in the report and believe it covers those areas and species required to be scoped in.

With regard to the conservation strategy, we have found no reference to how much net gain the applicant intends to deliver. We suggest a minimum of 10%; it would be good to see in writing as an aim or commitment.

Any water dependent designated sites, including the Humber Estuary SSSI, must be assessed within the WFD Screening Report or ES as appropriate.

Natural England will provide further comments and advice on this topic.

Chapter 7 Climate

We agree that climate should be included in the scope of the EIA and are satisfied with the proposed approach.

Chapter 8 Geology and Hydrology

8.2.2: We recommend that The Environment Agency's approach to groundwater protection ([The Environment Agency's approach to groundwater protection \(publishing.service.gov.uk\)](https://www.gov.uk/government/publications/the-environment-agency-s-approach-to-groundwater-protection)) should be referenced as valuable guidance for this chapter.

8.5.1. and 8.6.6:

The list of bedrock geologies provided is not exhaustive and a number of important bedrock aquifers have not been identified within this section, including Kirton Cementstone Beds, Scawby Limestone, Hibaldstow Limestone, Raventhorpe Beds, Santon Oolite, all of which comprise the Lincolnshire Limestone aquifer. In addition, Blisworth Limestone is a principal aquifer and Cornbrash Formation is a Secondary A aquifer; both of these are crossed by the pipeline route. These need to be included in all assessments. These geological units are evident in the Scoping Report Vol II, Part 3, Fig 8.2 pages 7 and 8.

8.6.16: Similarly, this section does not identify all WFD groundwater bodies: Blisworth Limestone Rutland Formation (ID GB40401G444500) and Cornbrash (ID GB40402G444700) are missing.

8.6.17-18: Deregulated supplies still in use should also be included. These are potential receptors which need to be considered. Local authorities should hold records of all unlicensed private water supplies in their districts and should be contacted for this information.

8.6.21: We note that recorded current and historic landfills identified through correspondence with the relevant local authorities have been collated. We have not had the opportunity to confirm the figures given at this point.

8.7.3 – 8.7.4:

We recommend that our Land Contamination Technical Guidance ([Land contamination: technical guidance - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/land-contamination-technical-guidance)) should be followed when considering potential land or groundwater contamination. We recommend that developers should:

- Follow the risk management framework provided in '[Land contamination: risk management](https://www.gov.uk/guidance/land-contamination-risk-management)' when dealing with land affected by contamination
- Refer to our [Guiding principles for land contamination](https://www.gov.uk/guidance/guiding-principles-for-land-contamination) for the type of information that we require in order to assess risks to controlled waters from the site – the local authority can advise on risk to other receptors, such as human health
- Consider using the [National Quality Mark Scheme for Land Contamination Management](https://www.gov.uk/guidance/national-quality-mark-scheme-for-land-contamination-management) which involves the use of competent persons to ensure that land contamination risks are appropriately managed
- Refer to the [contaminated land](https://www.gov.uk/guidance/contaminated-land) pages on gov.uk for more information.

If, during construction, contamination not previously identified is found to be present along the route then works should cease (unless otherwise agreed in writing with the local planning authority) until the developer has submitted a remediation strategy to the local planning authority (in consultation with the Environment Agency) detailing how this unsuspected contamination will be dealt with and obtained written approval from the local planning authority.

8.7.5: We welcome the proposal for detailed hydrogeological assessment for trenchless techniques and dewatering activities and ask to be consulted on these assessments. There is no mention of dewatering being a licensable activity here, although our earlier advice has been noted in Table 8.1. Unless any dewatering activities meet the criteria of the Water Abstraction and Impounding (Exemptions) Regulations 2017, an abstraction licence will be required. The development programme needs to account for potentially lengthy permitting timescales.

8.8.2: This section does not include the potential for groundwater resource losses should artesian flow be encountered during construction excavations; this should be included.

8.8.3: It would be useful to understand what potential need there may be for dewatering to take place during operation of the scheme.

Chapter 15 Waste and Materials

We are happy with the proposed scope.

Chapter 16 Hydrology and Land Drainage

16.2.7 Flood risk assessment (FRA) and Table 16.1:

FRAs should consider all sources of flooding, which may include tidal, fluvial, ground water, drainage systems, reservoirs, canals and ordinary watercourses. Please see this link for guidance on what should be included in a FRA [Flood risk assessment in flood zones 2 and 3 - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/flood-risk-assessment-in-flood-zones-2-and-3).

For this project the FRA must cover groundwater flood risk, particularly during construction, as artesian groundwater conditions are prevalent along sections of the corridor route. This has been scoped out of consideration in Table 16.2; it should remain within scope for construction as a minimum. The presence of blow wells along the route corridor demonstrates the potential for weaknesses in the overlying geological strata to allow artesian flow to emerge at surface.

Our latest guidance on climate change allowances for FRAs, based on recent research, can be found here: [Flood risk assessments: climate change allowances - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/consultations/flood-risk-assessments-climate-change-allowances)

Some further elements that should be considered in the FRA include but are not limited to:

- The effect that permanent ground raising or temporary mounds of soil (see 16.8.4) in the floodplain could have on flood risk, volumes of water displacement involved and mitigation measures where necessary.
- The landfall pits for the Humber tunnel and any mitigation/defences around the construction pits that may be required to prevent these from becoming flow routes when water levels in the Humber are high.
- Awareness of capital projects near East Halton Skitter Beck to improve defences in the vicinity of the pipeline route on the south bank of the Humber. The exact location of the proposed pipeline and construction areas should be provided, with intended timings, to ensure that the schemes will not affect each other. We would welcome conversations with the applicant around this to ensure that there are no conflicts between schemes.
- Potential impacts on the River Trent flood defence, as the proposed pipeline route crosses existing flood defences along this watercourse.

16.4.1 – 16.4.2: The Study Area buffer of 500m from the boundary of the scoping route corridor seems appropriate, although we expect the Environmental Statement (ES) to provide justification as to why this was selected. This buffer may need to be increased in some cases to assess the full potential impact on receptors. This would specifically need to be done where open cut watercourse crossings are being considered, because the impact may extend further. In this case a 1km buffer may be required, 500m upstream and 500m downstream at open cut trench crossings.

16.8.2: Any open cut watercourse crossings must be fully assessed in the Water Framework Directive (WFD) Screening Report or the ES as appropriate, because the watercourse crossings may impact on the hydrology and hydromorphology of the WFD waterbodies within the study area. Details of the method of works and mitigation must be included.

We note (Vol 1, Chapter 16, table 16.1) and welcome that the applicant is linked into Humber 2100 Plus communications and will keep abreast of the emerging Strategy for the management of flood risk around the Humber and the tidal tributaries. The new strategy will be a key part of supporting the region in climate adaptation and providing opportunities to improve resilience to the changes that may be expected from increased flood risks. The new strategy will be developed by the H2100 Plus partnership during the development of the pipeline approvals and construction, so it is hoped this link will help inform the proposal.

It is also acknowledged that the proposed construction methods will have limited impact on the current flood defence infrastructure. And that operation of the pipeline is mostly scoped out of the relevant part of the assessment.

However, it is important to assume there will need to be changes in land use and habitat along the route of the pipeline and in the vicinity of the AGI in future years as the area adapts to the impact of a changing climate. The developer should consider this and set out the implications of the instillation of the pipeline on future land use change, infrastructure improvement etc. to ensure consultees have the information they need to make an informed response to the proposal when submitted.

Therefore, we require clarity on the impact of the proposed pipeline on the ability of the Humber region to adapt to the impact of the changing climate. For example:

- Would there be restrictions to the raising, improving or otherwise altering/moving the flood risk management infrastructure around the line of the pipeline in the future therefore limited the ability to adapt infrastructure and build resilience to increasing flood risks?
- Would the storing of water above the pipeline be considered an additional load and be discouraged therefore limiting the ability to manage changing flood risks strategically?
- Would there be restrictions imposed along the pipeline route to land use change, particularly the development of estuarine or coastal/marginal habitat limiting the ability to work with natural process to build resilience to change?

These should either be answered as part of the wider ES or addressed as part of the other assessments (FRA etc) that will form part of the application.

Table 16.2 Matters scoped in or out of further assessment

We consider that the following amendments are required to in Table 16.2.

Row 1 Water interests (existing surface water abstractions and discharges)

If large volumes of dewatering need to be undertaken, existing surface water features and surface and groundwater abstractions may be impacted and so it should not be scoped out.

Row 4 Flood risk from rivers and the sea

The decommissioning phase of this matter has been scoped out. However, we recommend it should be scoped in because the reinstatement works to remove all AGIs during decommissioning may potentially take place within areas at risk of flooding. The flood risk of this activity will need to be assessed and mitigation measures put in place.

It might be useful to add into the operational justification section 'sea defences' to reflect discussions we have had around the landfall location at Easington. The sea defences are currently providing protection at this location; however, the lifetime of the proposed development extends beyond this guaranteed protection period. An alternative could be to include a separate line to capture this and reflect the importance of this matter.

Row 5 Flood risk from surface water and effects of the land drainage regime (quantity and quality of flows)

The decommissioning phase of this matter has been scoped out. We recommend it is included in the scope for the same reasons as above.

Row 6 Flood risk from other sources (groundwater, artificial sources)

We recommend all three phases be scoped in. There is potential for impact on groundwater flow pathways/sub-surface flows and groundwater ingress into excavations.

16.10:

It has been assumed that no additional modelling will be required. Although this presumption is most likely correct, the Humber area has an abundance of models, and this, combined with the varying local authority boundaries, is likely to mean judgment calls will be required to identify the best data to use. In some circumstances where the flood risk impacts are unclear, modelling may need to be carried out to provide the robust evidence required to make an informed decision. Please also ensure you refer to all relevant Strategic Flood Risk Assessments when writing your flood risk assessment.

Chapter 17 Major Accidents and Disasters

This chapter sets out that the project will use standard methods of assessment with respect to major accidents to people and the environment. We consider the topic is covered sufficiently and have no further comments to make at this stage.

Volume 2 part 1 - Figures

Saltend AGI - We note there are several locations being considered for the Saltend AGI. The applicant will be aware through their initial research that this area is at risk of flooding, and we have records of historical flooding that either interact with or are close to the boundaries of the locations being considered. This information can be requested if this has not already been done.

Main Rivers - The route crosses several main rivers; it is important to ensure that works do not affect the integrity of any flood defences, the Environment Agency's ability to access them or future defence improvement plans. Our preference is that all main river crossings should be trenchless.

Future schemes - The route does pass through or close to several towns and villages that have a history of flooding or that are at high risk of flooding. We have therefore passed on the proposed route plan to our teams leading on the flood and coastal erosion risk management investment programme. This will allow us to understand how your proposal may interact with any flood schemes or main rivers, both now and in the future and any opportunities that may arise as a result of this. We will pass on any further information on this matter as soon as we receive it.

Washlands – this route passes over an uncontrolled washland near the River Aire: this must be considered to ensure the function of the washland is not compromised. There should be no storage of material in the washlands that could reduce storage. The applicant must also be mindful that any temporary works could be subject to flooding. In addition, consideration must be given to whether there may be any impacts of having a pipeline under the washlands, for example through loading or future maintenance needs. This may be something you want to consider scoping in. We can also provide more information on the operation of this washland if required.

Environment Agency assets and land - We would be grateful if any impacts on assets or property owned by the Environment Agency were identified as early as possible to allow time for discussion regarding any necessary agreements.

Figure 2.1 - The railway shown here is referenced incorrectly in Table 2.2 of Volume 1 as Sheffield to Lincoln but in fact goes from Sheffield to Grimsby.

Further pre-application consultation

Should the applicant wish us to review any technical documents or want further advice to address relevant environmental issues, we can do this as part of our charged for service.

Further engagement at the pre-application stage will speed up our formal response to their application and provide them with certainty as to what our response to the Development Consent Order application will be. It should also result in a better quality and more environmentally sensitive development.

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

Yours sincerely

Nicola Farr
Sustainable Places - Planning Specialist

Direct dial [REDACTED]

Direct e-mail [REDACTED]@environment-agency.gov.uk

Feekins-Bate, Laura

From: PlantResponses <PlantResponses@espug.com>
Sent: 26 April 2022 10:28
To: Cottam, Emma
Cc: Humber Low Carbon Pipelines; Feekins-Bate, Laura
Subject: RE: EN070006 - Humber Low Carbon Pipeline - EIA Scoping Notification and Consultation

Good morning,

Thanks for sending this through. I have plotted this onto a map of our networks and ESP will be unaffected by these works.

Kind regards,

Matthew Simons
Operations Support Specialist

From: [REDACTED]
Sent: 19 April 2022 11:02
To: PlantResponses <PlantResponses@espug.com>
Cc: Humber Low Carbon Pipelines <HumberLowCarbon@planninginspectorate.gov.uk>; [REDACTED]
Subject: RE: EN070006 - Humber Low Carbon Pipeline - EIA Scoping Notification and Consultation

Hi Matthew

I have attached a GIS Shapefile of the application site provided by the Applicant, National Grid Carbon Limited (therefore we won't be able to assist with compatibility etc issues). We do not routinely provide Shapefiles with the consultation material and we don't hold any additional information beyond what is contained in the Scoping Report, so I trust this will assist.

Kind regards
Emma



The Planning
Inspectorate

Emma Cottam | Senior EIA Advisor
The Planning Inspectorate
T [REDACTED]



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From: PlantResponses <PlantResponses@espug.com>

Sent: 12 April 2022 14:22

To: Humber Low Carbon Pipelines <HumberLowCarbon@planninginspectorate.gov.uk>

Subject: RE: EN070006 - Humber Low Carbon Pipeline - EIA Scoping Notification and Consultation

Good afternoon,

The scope of works for this project is very large and therefore we would not be able to comment unless we were provided with a shape file or a comprehensive list of the eastings/northings for the proposed works.

Kind regards,

Matthew Simons
Operations Support Specialist

From: Humber Low Carbon Pipelines <HumberLowCarbon@planninginspectorate.gov.uk>

Sent: 12 April 2022 11:05

Cc: Humber Low Carbon Pipelines <HumberLowCarbon@planninginspectorate.gov.uk>

Subject: EN070006 - Humber Low Carbon Pipeline - EIA Scoping Notification and Consultation

Dear Sir/ Madam

Please see attached correspondence on the proposed Humber Low Carbon Pipeline project.

Please note that the deadline for consultation responses is **Tuesday 10 May 2022**, and is a statutory requirement that cannot be extended.

Kind regards

Laura



The Planning
Inspectorate

Laura Feekins-Bate | EIA Advisor
The Planning Inspectorate



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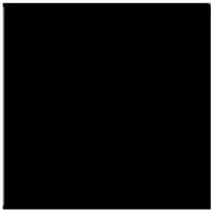
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Feekins-Bate, Laura

From: [REDACTED] >
Sent: 19 April 2022 09:03
To: Humber Low Carbon Pipelines
Subject: Re: EN070006 - Humber Low Carbon Pipeline - EIA Scoping Notification and Consultation

Hello,

Halsham Parish Council do not have any comments to put forward.

Pat Beech
Parish Clerk

----- Original Message -----

From: "Humber Low Carbon Pipelines" <HumberLowCarbon@planninginspectorate.gov.uk>
To: [REDACTED]
Cc: "Humber Low Carbon Pipelines" <HumberLowCarbon@planninginspectorate.gov.uk>
Sent: Tuesday, 12 Apr, 2022 At 11:22
Subject: EN070006 - Humber Low Carbon Pipeline - EIA Scoping Notification and Consultation

FAO OF CLARK TO HALSHAM PARISH COUNCIL

Dear Sir/ Madam

Please see attached correspondence on the proposed Humber Low Carbon Pipeline project.

Please note that the deadline for consultation responses is **Tuesday 10 May 2022**, and is a statutory requirement that cannot be extended.

Kind regards

Laura



The Planning
Inspectorate

Laura Feekins-Bate | EIA Advisor

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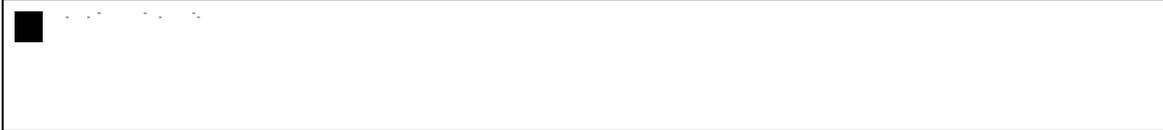
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Feekins-Bate, Laura

From: [REDACTED]
Sent: 09 May 2022 16:46
To: Humber Low Carbon Pipelines
Subject: EN070006 - Consultation on Scoping Opinion for the Humber Low Carbon Pipeline project (our ref: 22/01533/LETFRE)

Good afternoon,

Thank you for your letter dated 12 April 2022, consulting Harrogate Borough Council on the Scoping Opinion for this project.

The Council has no comments to make at this stage.

Kind regards,

Jillian Rann MRTPI
Principal Development Management Officer
Place-Shaping & Economic Growth
Harrogate Borough Council
P O Box 787
Harrogate
HG1 9RW

Email: [REDACTED]
Telephone: [REDACTED]
Website: www.harrogate.gov.uk

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CEMHD Policy - Land Use Planning,
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Merton Road,
Bootle, Merseyside
L20 7HS.

HSE email: NSIP.applications@hse.gov.uk

Laura Feekins-Bate (EIA Advisor)
The Planning Inspectorate
Temple Quay House
Temple Quay
Bristol
BS1 6PN

By email only

Date: 27 April 2022

Dear Ms Feekins-Bate

**PROPOSED HUMBER LOW CARBON PIPELINE (the project)
PROPOSAL BY National Grid Carbon Limited (the applicant)
INFRASTRUCTURE PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 2017 (as
amended) REGULATIONS 10 and 11**

Thank you for your letter of 12 April 2022 regarding the information to be provided in an environmental statement relating to the above project. HSE does not comment on EIA Scoping Reports but the following information is likely to be useful to the applicant.

HSE's land use planning advice

Will the proposed development fall within any of HSE's consultation distances?

According to HSE's records, the proposed onshore project components (Figure 2.1 – Humber Low Carbon Pipeline Project, The Scoping Route Corridor (10047064-ARC-EGN-ZZ-DR-ZZ-00022-S2 Rev P01, 28/03/2022)) potentially falls within the Consultation Zones of multiple major hazards sites. It appears from the project EIA (National Grid Humber Low Carbon Pipelines EIA Scoping Report, April 2022, EN070006-000026-HLCP) that much of the development is not normally manned during normal operations other than infrequent maintenance. However, the pumping facility may have a small number of operational staff and may be impacted by the following major hazard sites:

HSE Ref #0125 operated by Centrica Storage Limited PKA BG Storage Ltd. Natural Gas Terminal Rough Facilities, Dimlington Road, Easington, Hull, HU12 0TQ.

HSE Ref #3029 operated by Perenco UK Ltd. Perenco UK Ltd Dimlington Terminal Easington, Hull, HU12 0SH.

HSE Ref #4223 operated by GASSCO AS UK. Land west of Dimlington Road, Easington, East Riding of Yorkshire, HU12 0SX.

The Applicant should make contact with the above operators, to inform an assessment of whether or not the proposed development is vulnerable to a possible major accident.

There are also several major accident hazard pipelines that the proposed development crosses, associated with the following operators:

- National Grid Gas PLC.
- Northern Gas Networks.
- Scottish Power PLC.
- Cadent Gas Ltd.
- Saltend Cogeneration Co Ltd.

The Applicant should make the necessary approaches to the relevant pipeline operators. There are three particular reasons for this:

- i) the pipeline operator may have a legal interest in developments in the vicinity of the pipeline. This may restrict developments within a certain proximity of the pipeline;
- ii) the standards to which the pipeline is designed and operated may restrict major traffic routes within a certain proximity of the pipeline. Consequently, there may be a need for the operator to modify the pipeline or its operation, if the development proceeds;
- iii) to establish the necessary measures required to alter/upgrade the pipeline to appropriate standards.

HSE's Land Use Planning advice would be dependent on the location of areas where people may be present and as indicated previously, the pumping facility may have a small number of operational staff associated with it. When we are consulted by the Applicant with further information under Section 42 of the Planning Act 2008, we can provide full advice.

Would Hazardous Substances Consent be needed?

The presence of hazardous substances on over or under land at or above set threshold quantities (Controlled Quantities) will probably require Hazardous Substances Consent (HSC) under the Planning (Hazardous Substances) Act 1990 as amended. The substances, alone or when aggregated with others for which HSC is required, and the associated Controlled Quantities, are set out in The Planning (Hazardous Substances) Regulations 2015 as amended.

HSC would be required to store or use any of the Named Hazardous Substances or Categories of Substances at or above the controlled quantities set out in Schedule 1 of these Regulations.

Further information on HSC should be sought from the relevant Hazardous Substances Authority.

Regulation 5(4) of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 requires the assessment of significant effects to include, where relevant, the expected significant effects arising from the proposed development's vulnerability to major accidents. HSE's role on NSIPs is summarised in the following Advice Note 11 Annex on the Planning Inspectorate's website - Annex G – The Health and Safety Executive. This document includes consideration of risk assessments on page 3.

Explosives sites

HSE has no comment to make as there are no licensed explosives sites in the vicinity.

Electrical Safety

No comment from a planning perspective.

At this time, please send any further communication on this project directly to the HSE's designated e-mail account for NSIP applications at nsip.applications@hse.gov.uk . We are currently unable to accept hard copies, as our offices have limited access.

Yours sincerely



Allan Benson
CEMHD4 NSIP Consultation Team

Feekins-Bate, Laura

From: [REDACTED]
Sent: 12 April 2022 14:22
To: Humber Low Carbon Pipelines
Subject: FW: EN070006 - Humber Low Carbon Pipeline - EIA Scoping Notification and Consultation
Attachments: HLCP - Statutory consultation letter.pdf

Hi Laura,

Further to the below, I can confirm that I don't have any comments. All structures in the concerned area were sold to Kingston Upon Hull City Council.

Regards

Musa

Muhammad Musa

Historical Railways Estate (on behalf of Department for Transport)

National Highways | 37 Tanner Row | York | YO1 6WP

Mobile: + [REDACTED]

Web: www.nationalhighways.co.uk

From: HRE Enquiries
Sent: 12 April 2022 13:12
To: [REDACTED]
Cc: HRE Enquiries <hreenquiries@nationalhighways.co.uk>
Subject: FW: EN070006 - Humber Low Carbon Pipeline - EIA Scoping Notification and Consultation

Hi Musa

This falls under your region.

Regards
Jo

Joanne Fisher

Historical Railways Estate (on behalf of Department for Transport)

National Highways | 37 Tanner Row | York | YO1 6WP

Mobile: + [REDACTED]

Web: www.nationalhighways.co.uk.

Please note – I do not work on Mondays

From: Humber Low Carbon Pipelines [<mailto:HumberLowCarbon@planninginspectorate.gov.uk>]
Sent: 12 April 2022 11:05
Cc: Humber Low Carbon Pipelines <HumberLowCarbon@planninginspectorate.gov.uk>
Subject: EN070006 - Humber Low Carbon Pipeline - EIA Scoping Notification and Consultation

Dear Sir/ Madam

Please see attached correspondence on the proposed Humber Low Carbon Pipeline project.

Please note that the deadline for consultation responses is **Tuesday 10 May 2022**, and is a statutory requirement that cannot be extended.

Kind regards
Laura



Laura Feekins-Bate | EIA Advisor
The Planning Inspectorate

 @PINSgov  The Planning Inspectorate  planninginspectorate.gov.uk

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DPC:76616c646f72



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Registered in England and Wales no 9346363 | Registered Office: Bridge House, 1 Walnut Tree Close, Guildford, Surrey GU1 4LZ

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From: [REDACTED]
Sent: 10 May 2022 18:40
To: Humber Low Carbon Pipelines
Cc: Emerick, Keith; Yorkshire ePlanning; Midlands ePlanning; Hammon, Andy; Nicholas, Matthew; MacDonald, Alison
Subject: EN070006 - Humber Low Carbon Pipeline - EIA Scoping Notification and Consultation - Deadline 10/05/2022 Historic England Advice our ref PL00772542

Your Ref EN070006 our ref PL00772542

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

Application by National Grid Carbon Limited (the Applicant) for an Order granting Development Consent for the Humber Low Carbon Pipeline project (the Proposed Development)

Dear PINS

Thank you for consulting us on EIA scoping in respect of the above scheme this is a joint response on behalf of our Midlands and Yorkshire Regions.

Historic England Advice

We welcome the inclusion of heritage matters in the submitted scoping report and look forwards to ongoing discussions with the applicants in respect of both setting effects upon heritage assets and direct impacts upon archaeological remains.

We note the iterative approach to investigations set out in the report and will look forwards to early sight of the results of cartographic, geophysical survey, lidar and aerial photographic analysis, geotechnical work, and the results of the applicant's detailed consultation with Local Authority Archaeological Curators and Historic Environment Records and Portable Antiquities Scheme Records. It is highly likely that intrusive (trenched) investigations will be necessary in advance of determination.

The approach to setting assessment should we advise follow the structured approach set out in out GPA3 Setting of Heritage Assets, the distance of search should be adaptive to the significance and sensitivity of the assets which the scheme interacts and the materiality of the works proposed, in particular in the case of designed landscapes. Views across particularly sensitive landscape zones such as those where multiple assets such as church spires articulate with a common topographic space may require particular consideration both in terms of fixed point and kinetic views. Where pipelines bisect features such as parish boundaries banks, important field systems or areas of well preserved ridge and furrow etc reinstatement should include the earthwork form rather than introducing a flattened strip.

Particular attention should be paid to the historic landscape character of the Isle of Axholme, Humberhead Levels, Humber Estuary and Holderness. The former coastal marshes, creeks, inlets, wharfs and ferries, including drainage works, warped deposits, natural alluvium and buried landscapes / topography all present specific methodological challenges. Military installations, infrastructure scatters and crash sites also require bespoke assessment approaches.

The significance / character / importance of assets on the pipeline routes will need to be well understood from an early stage such that route options can effectively be weighed and risks managed. It is important both that opportunities for reduction in harm are realised and that the time required for archaeological evaluation and reporting is allowed for. Ancillary works for access, storage and compounds should be fully attended to within the EIA. Areas of heightened risk (burial sites / wet deposits / former water courses etc) should be afforded early attention as should resources requiring particular methodological approaches such for instance as battlefields or air crash. See our <https://historicengland.org.uk/images-books/publications/deposit-modelling-and-archaeology/> and other publications.

Given the landscape scale of this and associated projects the schemes should seek to address structures research questions about this landscape to ensure that localised archaeological interventions contribute to a whole (in terms of public value) which is more than the sum of their parts.

The following are specific comments on the proposed assessment methodology set out in Scoping Report vol I

Para 3.7 There needs to be some specific recognition that the applicant and HBMCE disagree about the use of language, specifically the use of 'significance'. The applicant talks about 'significant effects', whilst we talk about the 'effect on significance', which are two completely different things.

Para 9.3.1 Engagement. The 'heritage working group' is working well thus far, but more frequent meeting are likely to be necessary as assessment work proceeds.

Table 9.2 Scoped In/Out

We do not concur that Historic Landscape Character should be scoped out. We note the observation that the scheme "will therefore not introduce a permanent substantial change of character to the landscape..." but in this context an understanding of Historic Landscape Character is essential to an informed understanding of the significance of impacts and the areas of particular attention required in terms of recording and reinstatement.

Table 9.3. Grade II LBs and RPGs may be classed as 'Medium' value further to the Design Manuel for Roads and Bridges but all Listed Buildings are nationally designated and their importance should be appropriately treated in line with the NPS/NPPF.

Table 9.3. The categories Low: "assets compromised by poor preservation and /or poor survival of contextual associations" and Negligible: "assets with very little or no surviving archaeological/ historical interest", can be problematic. There needs to greater methodology clarity in how this determination is reached and what guidance is used. Reductive assessments which focus narrowly on archaeological potential over wider values (see our Conservation Principles) should be avoided.

Para 9.6 Baseline conditions: We welcome that a geoarchaeological assessment of the geomorphology of the project and study areas has been included. The HE deposit modelling guidance (<https://historicengland.org.uk/images-books/publications/deposit-modelling-and-archaeology/>) should be referenced in the document.

Para 9.8 Description of likely significant effects: This should also include dewatering from the drain-like action of the pipeline trench, etc., of organic rich deposits (i.e. alluvium and peat), the same would apply to decommissioning.

Para 9.9.1 and 9.9.4 The use of ‘significance of effect’ can be unhelpful in providing a read across from EIA to NPS/NPPF language, ‘impact’ can be positive or negative, the assessment should help the reader to understand the degree of harm to significance.

Para 10.5 Receptors: The assessment of setting is not reliant on public access or PROW locations, out published setting advice (GPA3 Setting of Heritage Assets) should be followed correctly.

10.9 Proposed assessment methodology: LVIA is not a substitute for structured setting assessment (see GPA3) as it is a methodologically distinct approach which can tend to take landscape as a blank slate instead of understanding and assessing the harm to significance in terms of the heritage of human habitation and placemaking. Dynamic and kinetic assessments which engage with movement through the landscape should be explored not just using fixed point views. This is particularly relevant to the proposed built structures and their likely (or not) visibility.

We look forwards to further detailed discussion with the applicants.

Please copy all future correspondence to our regional casework addresses to allow effective logging e-midlands@HistoricEngland.org.uk cc e-yorks@english-heritage.org.uk

Yours sincerely
Tim Allen

Tim Allen MA FSA
Development Advice Team Leader (North)

Midlands Region
Historic England
The Foundry, 82 Granville Street, Birmingham B1 2LH

Direct Line 
<http://www.historicengland.org.uk/> | [@HistoricEngland](https://www.instagram.com/HistoricEngland)



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Your Ref: EN070006

Our Ref: 22/HLCP/CONSUL

Contact Officer: Simon Mounce

Telephone: [REDACTED]

Email: [REDACTED]

Textphone: [REDACTED]

Date: 09 May 2022

Emma Cottam
Senior EIA Advisor
Environmental Services
Central Operations
Temple Quay House
2 The Square
Bristol
BS1 6PN

Dear Ms Cottam,

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

**Application by National Grid Carbon Limited (the Applicant) for an Order
granting Development Consent for the Humber Low Carbon Pipeline Project
(the Proposed Development)**

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

Thank you for consulting Hull City Council and inviting comments on the request for a Scoping Opinion relating to the Humber Low Carbon Pipeline.

The Council is supportive of the Pipeline project and recognises the scheme as a vital part of the solution to the UK's net zero 2050 target.

The Council have the following comments to make on the Environmental Impact Assessment Scoping Report April 2022.

5. Air Quality

Whilst the development is proposed to be undertaken outside of Hull City Council's administrative area, construction traffic could be routed along the Strategic Road Network and local highway network within the City. This corridor includes a designated Air Quality Management Area. Hull City Council would wish to be consulted on assessment methodologies and potential mitigations.

6. Ecology and Biodiversity (incl. Volume III Appendices A-D Conservation Strategy)

The proposed methods and scope of survey are considered to be appropriate. Hull City Council will be happy to share details of relevant plans or projects within the zone of influence as the assessment progresses. The identified approach to biodiversity net gain is welcomed.

14. Traffic and Transport

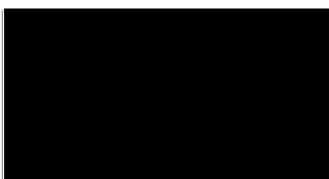
The Scoping Report advises that there are no traffic figures currently available to identify the likely levels or assignment of construction traffic (staff and HGV's) for the project, and consequently the likely impact on Hull City Council's highway network. Para 14.7.3 to the report identifies that the draft DCO will contain a requirement for a Construction Traffic Management Plan and a Staff Travel Plan. The wording of that requirement and the scope of those plans would be of interest to Hull City Council, in order to understand the likely traffic impact on the Council's highway network and what measures are proposed to mitigate such impact. Similarly, the yet to be decided locations of construction compounds and the access points along the route of the pipeline, and any resultant implications that they may have for impacts upon the city's road network.

Para 14.8.3 identifies that potential effects on receptors will be included in the assessment of construction traffic where the flows generated by the project increase baseline traffic and HGV flows by 30% or 10% in specifically sensitive areas. Depending upon the routing of traffic, some junctions may already be reaching capacity at peak times, and only a small increase could have significant implications for the network. The documentation references AADT and 12 hour traffic flows, but assuming that some junction capacity assessments are required, peak hour traffic flows survey information will be needed to support any traffic modelling to be undertaken to assess impact.

11. Noise and Vibration

Whilst the development is proposed to be undertaken outside of Hull City Council's administrative area, construction traffic could be routed along the Strategic Road Network and local highway network within the City. In such circumstances, assessment of potential noise and vibration impact on sensitive receptors and identification of appropriate mitigation measures should be undertaken. Hull City Council would wish to be consulted on such matters

Yours sincerely



John Craig MRTPI
Head of Planning
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Alfred Gelder Street
Hull HU1 2AA

The Planning Inspectorate
Environmental Services
Central Operations
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BRISTOL
BS1 6PN

**Keadby Developments Ltd
Keady Generation Ltd
Keadby Power Station
PO BOX 89
Keadby
SCUNTHORPE
DN17 3AZ**

10/05/22

REF: EN070006

Dear Sir/Madam

Keadby Generation Limited (KGL) holds an electricity generation licence for Keadby 2 CCGT ('Keadby 2') and for Keadby Power Station ('Keadby 1'). KGL is also promoting the Keadby 3 Carbon Capture Power Station DCO ('Keadby 3'). We acknowledge the EIA scoping request lodged by National Grid Carbon Limited for the Humber Low Carbon Pipelines Project ('HLCPP'). These are likely to represent committed development for the HLCPP EIA having regard to paragraphs 107-108 of the Guidance on the pre-application process (DCLG 2015). We would like to provide information that may assist EIA production.

Keadby 1 has a capacity of 735MWe and entered operations in 1996. Keadby 2 has a capacity of 893MWe and is anticipated to enter commercial operation in October 2022, with an expected 25-year operating life. Carbon capture reserve space is provided adjoining the generating station.

Keadby 3 is a proposed 910MWe carbon capture equipped CCGT. Its DCO application was formally accepted on 28 June 2021 and the examination will end on or before 7th June 2022. NGCL submitted a Relevant Representation and became an interested party due to its interest in the interfaces between Keadby 3 and Humber Low Carbon Pipelines Project (HLCPP), including the proposed carbon dioxide pipeline connection arrangement. KGL and NGCL have engaged on the Keadby 3 application and the parties are negotiating requirements and bespoke protective provisions that provide controls relevant to NGCL (as future undertaker of the HLCPP). An update on the position reached is to be provided to the Examining Authority on 10th May 2022. Keadby 3 has been subject to an EIA (see application documents 6.1-6.4 and the change request EIA addendum in document references 10.6-10.9 which are being submitted on 10th May 2022).

Keadby 3 could enter commercial operations as early as 2026 with an operational lifetime of around 25 years, is designed to be dispatchable, and is seeking access to HLCPP to capture and transport its carbon to be stored safely offshore. A range of controls exist in the Keadby 3 draft DCO to ensure that the generating station is carbon capture equipped, while the environmental permit will mandate the carbon capture rate and its measurement and reporting. In March 2022 BEIS announced that Keadby 3 is a phase-2 eligible project, able to connect to the Track-1 East Coast Cluster for mid-2020s deployment.

Yours sincerely,

SSE plc

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sse.com

John Johnson

Director of Development
SSE Thermal

SSE plc

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The Planning Inspectorate

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(by e-mail)

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

Application by National Grid Carbon Limited (the Applicant) for an Order granting Development Consent for the Humber Low Carbon Pipeline project (the Proposed Development)

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

May 4, 2022

Your Ref: EN070006

Dear Sir/Madam,

Following your letter of 12th April 2022, Uniper Hydrogen UK Ltd, a subsidiary of Uniper SE, has reviewed the report that accompanies the Applicant's request for a Scoping Opinion as to the information to be provided in an Environmental Statement (ES) relating to the Proposed Development. Having done so, we do not have any significant comments as:

- we believe the report has considered each of the project's likely effects systematically, thoroughly and in a way that will ensure all of the potentially significant environmental impacts during construction, operation and decommissioning will be considered within the Environmental Statement;
- we believe that the assessment methodologies proposed for each of the environmental impacts are appropriate; and
- the Applicant has clearly already completed engagement with a significant number of stakeholders regarding both the scope of the ES and the assessment methodologies.

As the Applicant has recognised in Table 2.1 of the report, Uniper Hydrogen UK Ltd is, proposing to construct blue and green hydrogen production facilities on Uniper UK Ltd's site at Killingholme. Our project, the Humber Hub Project, is a partner in the Zero Carbon Humber consortium and in the East Coast Cluster that has been selected by the Government to be taken forward under phase one of the Cluster Sequencing Programme that forms part of the Prime Minister's Ten Point Plan for Delivering a Green Industrial Revolution. As the Proposed Development is a critical element in



deployment of the East Coast Cluster by the mid-2020s, and in the UK achieving its ambition of decarbonising and reaching net zero emissions by 2050, we are strongly supportive of it as a project.

We recognise that successful deployment of the Cluster will require collaboration between a number of projects and we are already in regular contact with the Applicant about the Proposed Development. As identified in the report, we understand that the Humber Hub Project needs to be considered as a Connected Project of the Proposed Development and one for which the inter-project cumulative effects will need to be considered in the ES. We therefore acknowledge our duties under Regulation 11(3) of the EIA Regulations and, if requested by the Applicant, will make available to them information in our possession that is considered relevant to the preparation of the ES for the Proposed Development.

Yours sincerely,



Colin Wilkie
2022.05.04
11:44:32 +01'00'

Colin Wilkie

General Project Manager
Uniper Hydrogen UK Ltd



Maritime &
Coastguard
Agency

Helen Croxson
Maritime and Coastguard Agency
Bay 2/24
Spring Place
105 Commercial Road
Southampton
SO15 1EG

www.gov.uk/mca

Ref: EN070006

10th May 2022

Via email: HumberLowCarbon@planninginspectorate.gov.uk

Dear Emma,

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

Application by National Grid Carbon Limited (the Applicant) for an Order granting Development Consent for the Humber Low Carbon Pipeline project (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 letter dated 12 April 2022 inviting the Maritime and Coastguard Agency (MCA) to comment on the Scoping report consultation for the Humber Low Carbon Pipeline project. The MCA notes the Scoping report (the project) comprises of:

- An onshore pipeline to transport carbon dioxide from industrial and power sector Connected Projects, including proposed hydrogen production plants in the Humber area.
- An onshore pipeline to transport hydrogen from production plants of Connected Projects to end users (aligned with the carbon dioxide pipeline) and
- A tunnel beneath the Humber Estuary including drive shaft and reception pit.

The MCA has an interest in the works associated with the marine environment, and the potential impact on shipping, safety of navigation, access to ports, harbours and marinas and any impact on our search and rescue obligations. We note that the Marine and Coastal Access Act (MCAA) 2009, Marine Policy Statement and the East Inshore Marine Plan will form part of the policy context and be given appropriate consideration in relation to the intertidal area at the Easington landfall and associated marine licence requirements under part 4 of the MCAA. The project will consult the Marine Management Organisation (MMO) as part of the s.42 consultation requirements and seek to agree the draft (deemed) marine licence with the MMO prior to submitting the DCO application.

It is the MCA's understanding that, at the landfall point, the project will connect to an offshore pipeline for onward transportation of carbon dioxide to the Endurance saline aquifer under the North Sea. The offshore pipeline and associated work forms part of a separate consent. This project will however include works within the intertidal zone down to Mean Low Water Springs (MLWS) to facilitate the connection to the offshore pipeline. There will be a crossing of the tidal River Trent and the River Humber Estuary, activities taking place on vessels located close to the coastline and there is likely to be the use of temporary construction compounds within the watercourse.

The Scoping report states that marine vessel traffic associated with the landfall installation would not be considered in this assessment, and would be covered by the offshore submission, although the potential impacts and necessary consents for the intertidal zone have been considered within this EIA Scoping report. It would be useful for the applicant to define the extent of the works undertaken in the intertidal zone, as although the works are close inshore where the impact on shipping and navigation is likely low, there may be risk mitigation measures required for consideration to ensure the safety of navigation is maintained during the construction.

We also expect the location of the works in the marine environment to fall within the jurisdiction of Associated British Ports (ABP), as the Statutory Harbour Authority (SHA) for the River Humber and therefore they are responsible for the safety of navigation within their waters. The SHA should be notified with regards to any works within their jurisdiction.

We note that the design solution in the intertidal zone is still under consideration and depending on the final solution selected there may be further impacts. The Marine Management Organisation (MMO) will be consulted to discuss both the proposed methodology to cross the River Humber and to discuss works in the intertidal zone. The MCA would therefore expect the applicant to confirm the extent of construction works undertaken in the intertidal zone (between the Mean High and Mean Low Water Level) and confirm with the MCA and SHA any required risk mitigation measures as part of the consent under the Marine and Coastal Access Act 2009.

We hope you find this response useful at scoping stage.

Yours sincerely,



Helen Croxson
Marine Licensing and Space Launch lead
UK Technical Services Navigation



Ministry of Defence

Planning Inspectorate
Environmental Services
Central Operations
Temple Quay House
2 The Square
Bristol,
BS1 6PN
England

Your Reference: EN070006

Our reference: 10054935

Dear Emma Cottam,

MOD Safeguarding

Proposal: Humber Low Carbon Pipeline - EIA Scoping Notification and Consultation

Location: Dual pipelines to transport carbon dioxide and hydrogen between Drax in North Yorkshire to a landfall point on the Holderness coast in East Riding of Yorkshire and at the landfall point will connect to an offshore pipeline for onward transportation of carbon dioxide to the Endurance saline aquifer under the North Sea

Thank you for consulting the Ministry of Defence (MOD) on the above proposed development which was received by this office on 12/04/2022.

The Defence Infrastructure Organisation (DIO) Safeguarding Team represents the Ministry of Defence (MOD) as a consultee in UK planning and energy consenting systems to ensure that development does not compromise or degrade the operation of defence sites such as aerodromes, explosives storage sites, air weapon ranges, and technical sites or training resources such as the Military Low Flying System.

This Scoping Opinion is in relation to the construction of dual pipelines to transport carbon dioxide and hydrogen between Drax in North Yorkshire to a landfall point on the Holderness coast in East Riding of Yorkshire and at the landfall point the Project will connect to an offshore pipeline for onward transportation of carbon dioxide to the Endurance saline aquifer under the North Sea.

After reviewing the documents provided, I can confirm the MOD has no safeguarding concerns to this proposal at this stage, but we must be further consulted at future planning stages and provided with exact location co-ordinates and elevations of any structures to conduct an appropriate assessment and provide the MOD's definitive response.

Defence Infrastructure Organisation

Ministry of Defence
Safeguarding Department
St George's House
DIO Headquarters
DMS Whittington
Lichfield
Staffordshire
WS14 9PY

Tel: [REDACTED]

E-mail: DIO-safeguarding-statutory@mod.gov.uk

www.mod.uk/DIO

27 April 2022

The MOD must emphasise that the advice provided within this letter is in response to the information detailed above in the documents titled "Humber Low Carbon Pipelines-EIA Scoping Report Volumes 1 and 2 part 1" dated April 2022. Any variation of the parameters (which include the location, dimensions, form, and finishing materials) detailed may significantly alter how the development relates to MOD safeguarding requirements and cause adverse impacts to safeguarded defence assets or capabilities. In the event that any amendment, whether considered material or not by the determining authority, is submitted for approval, the MOD should be consulted and provided with adequate time to carry out assessments and provide a formal response.

I trust this is clear however should you have any questions please do not hesitate to contact me.

Yours sincerely

Mr Michael Billings
Assistant Safeguarding Manager

Land Rights and Acquisitions

Anne Holdsworth
DCO Liaison Officer
UK Land and Property
[REDACTED]@nationalgrid.com
Direct tel: [REDACTED]

www.nationalgrid.com

SUBMITTED ELECTRONICALLY:
humberlowcarbon@planninginspectorate.gov.uk.

04 May 2022

Dear Sir/Madam

APPLICATION BY NATIONAL GRID CARBON LIMITED (THE APPLICANT) FOR AN ORDER GRANTING DEVELOPMENT CONSENT FOR THE HUMBER LOW CARBON PIPELINE PROJECT

SCOPING CONSULTATION RESPONSE

I refer to your letter dated 12th April 2022 in relation to the above proposed application. This is a response on behalf of National Grid Electricity Transmission PLC (NGET).

Having reviewed the consultation report, I would like to make the following comments regarding NGET infrastructure within or in close proximity to the current red line boundary.

Electricity Transmission Infrastructure

NGET has high voltage electricity overhead transmission lines within or in close proximity to the scoping area. The overhead lines form an essential part of the electricity transmission network in England and Wales.

Overhead Lines

- 4VC 400kV Drax – Thornton 1
Drax – Thornton 2
- 4VJ 400kV Drax to Eggborough1
Drax to Eggborough 2
- ZDA 400kV Drax – Keadby – Thorpe Marsh
- ZDA 400kV Cottam – Keadby 1
Cottam – Keadby 2
- 4TM 400kV Keadby – West Burton1
Keadby – West Burton 2

- 2KN 400kV Creyke Beck – Humber Refinery – Keadby
 Creyke Beck – Keadby - Killingholme
- 4KG 400kV Keadby - Killingholme
 Grimsby West - Keadby

I enclose plans showing the location of NGET's assets.

Specific Comments

- NGET's Overhead Lines are 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 3 (2004)
- 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 worse 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 NGET prior to any such changes in both level and construction being implemented.

To view the SSW22 Document, please use the link below:

Please see further guidance on working near NGET assets at the following link:

<https://www.nationalgrid.com/electricity-transmission/document/82926/download>

Further Advice

We would request that the potential impact of the proposed scheme on NGET's existing assets as set out above and including any proposed diversions is considered in any subsequent reports, including in the Environmental Statement, and as part of any subsequent application.

Where any diversion of apparatus may be required to facilitate a scheme, NGET is unable to give any certainty with the regard to diversions until such time as adequate conceptual design studies have been undertaken by NGET. Further information relating to this can be obtained by contacting the email address below.

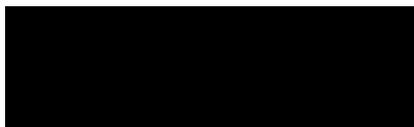
Where the promoter intends to acquire land, extinguish rights, or interfere with any of NGET apparatus, protective provisions will be required in a form acceptable to it to be included within the DCO.

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

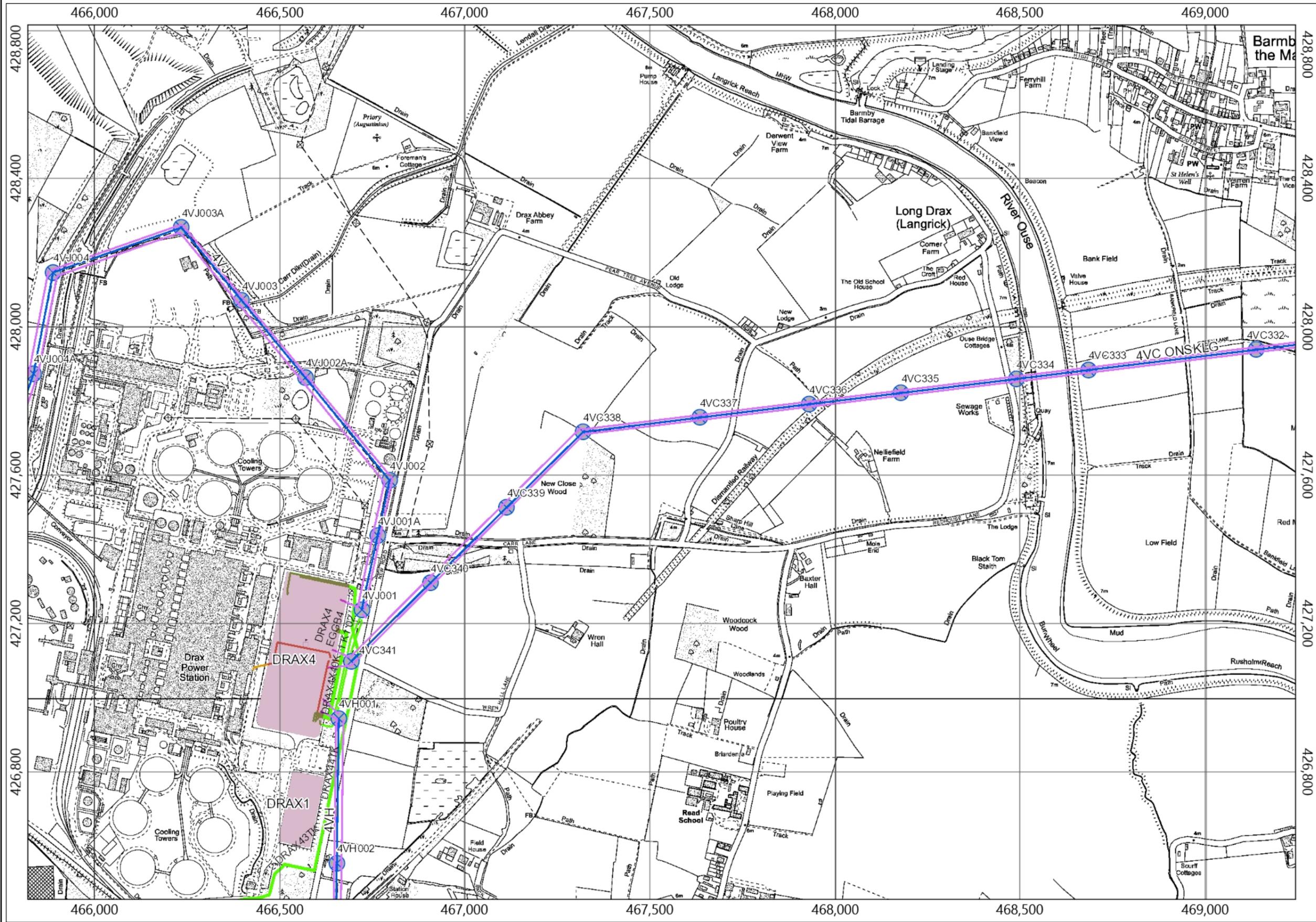
I hope the above is useful. If you require any further information please do not hesitate to contact me.

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

Yours faithfully



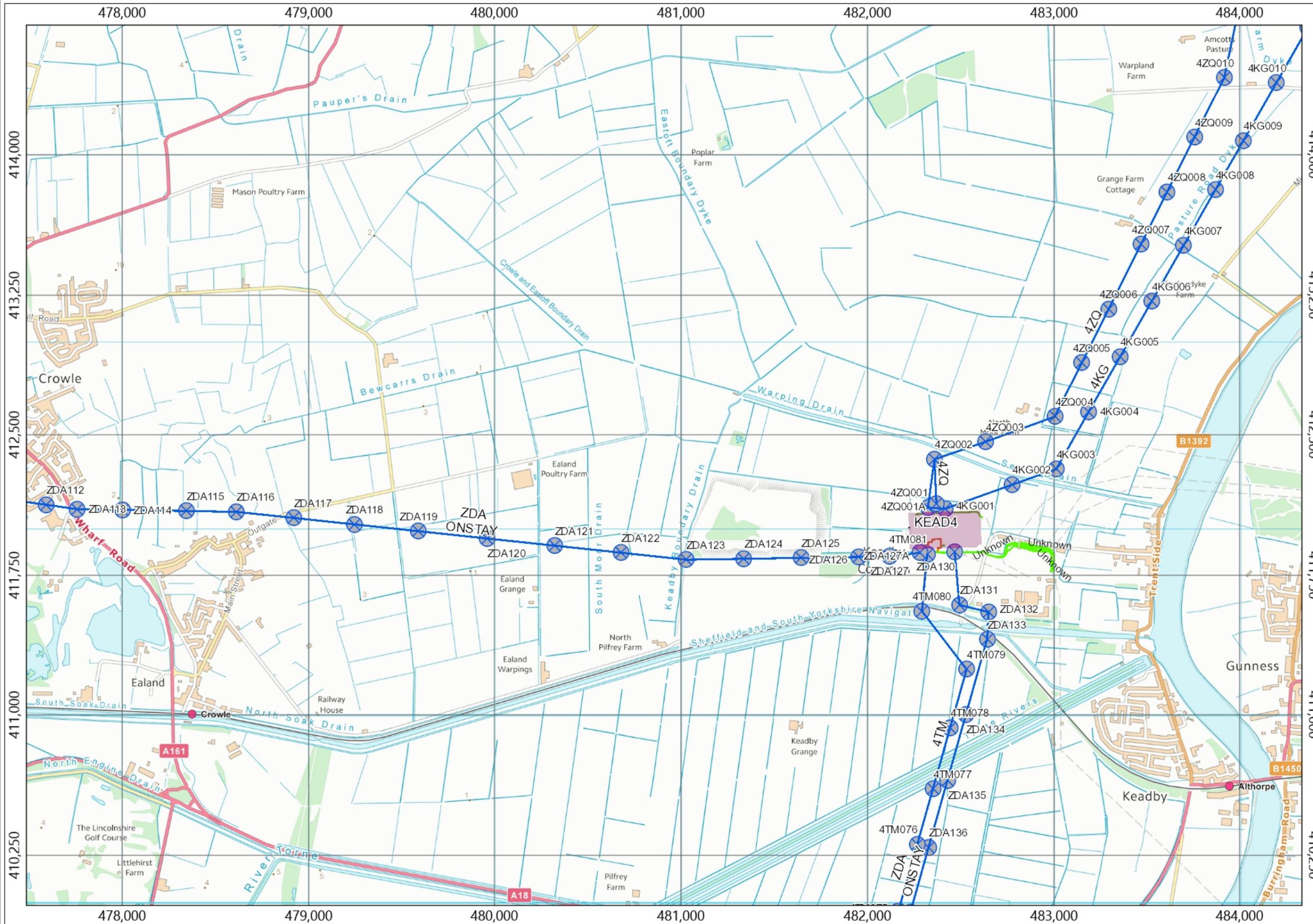
Anne Holdsworth
DCO Liaison Officer, Land Rights and Acquisitions



- Legend:**
- Substations Commissioned
 - Circuits
 - Commissioned
 - Decommissioned Group
 - Planned and Spares
 - OHL 400Kv Commissioned
 - OHL 275Kv Commissioned
 - OHL 132Kv & Below Commissioned
 - Towers Commissioned
 - Buried Cable Commissioned
 - Fibre Cable Commissioned
 - Pilot Cable
 - Pillar
 - Oil Tank
 - Link Box
 - Gauge
 - Joint Bay
 - Cable Joint
 - Oil Pipe
 - Cooling Pipe
 - Cooling Station
 - RAMM
 - Cable Tunnel
 - Gas Operational Boundary
 - Gas Site Boundary
 - Trial Hole
 - Vantage Point
 - Aerial Marker Post
 - Pipe Crossing Point
 - CP Test Post
 - Transformer Rectifier
 - Pipeline Crossing Sleeve
 - Nitrogen Sleeve
 - Other Sleeves
 - Pipe Line Control Point
 - Named Pipeline Section
 - River Crossings

Notes:
Humber Low Carbon Pipelines NGET Asset Plan 1





Legend:

- Substations Commissioned
- Circuits
 - Commissioned
 - Decommissioned Group
 - Planned and Spares
- OHL 400kV Commissioned
- OHL 275kV Commissioned
- OHL 132kV & Below Commissioned
- Towers Commissioned
- Buried Cable Commissioned
- Fibre Cable Commissioned
- Pilot Cable
- Oil Pipe
- Cooling Pipe
- Cooling Station
- RAMM
- Cable Tunnel

Notes:

Humber Low Carbon Pipelines NGET Asset Plan 2

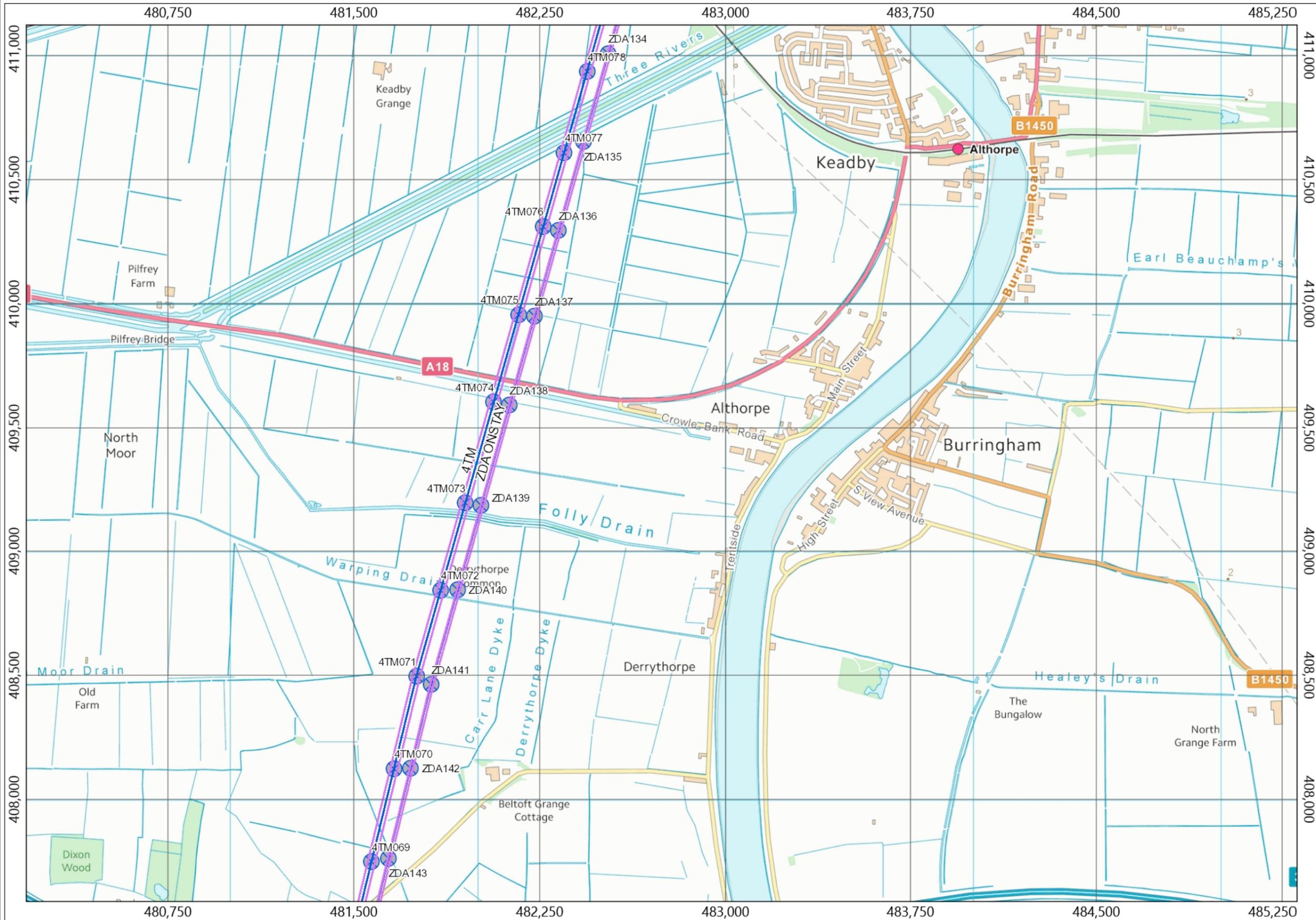
0 0.51 1.0 Kilometers

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Date: 19/04/2022 Page size: A3 Landscape Scale: 1: 20,000
 Time: 14:26:01 Print by: Holdsworth, Anne



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Legend:

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- Circuits
- Commissioned
- Decommissioned Group
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- Towers Commissioned
- Buried Cable Commissioned
- Fibre Cable Commissioned
- Pilot Cable
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- Cooling Pipe
- Cooling Station
- RAMM
- Cable Tunnel

Notes:
Humber Low Carbon Pipelines NGET Asset Plan 3

0 0.38 0.8 Kilometers

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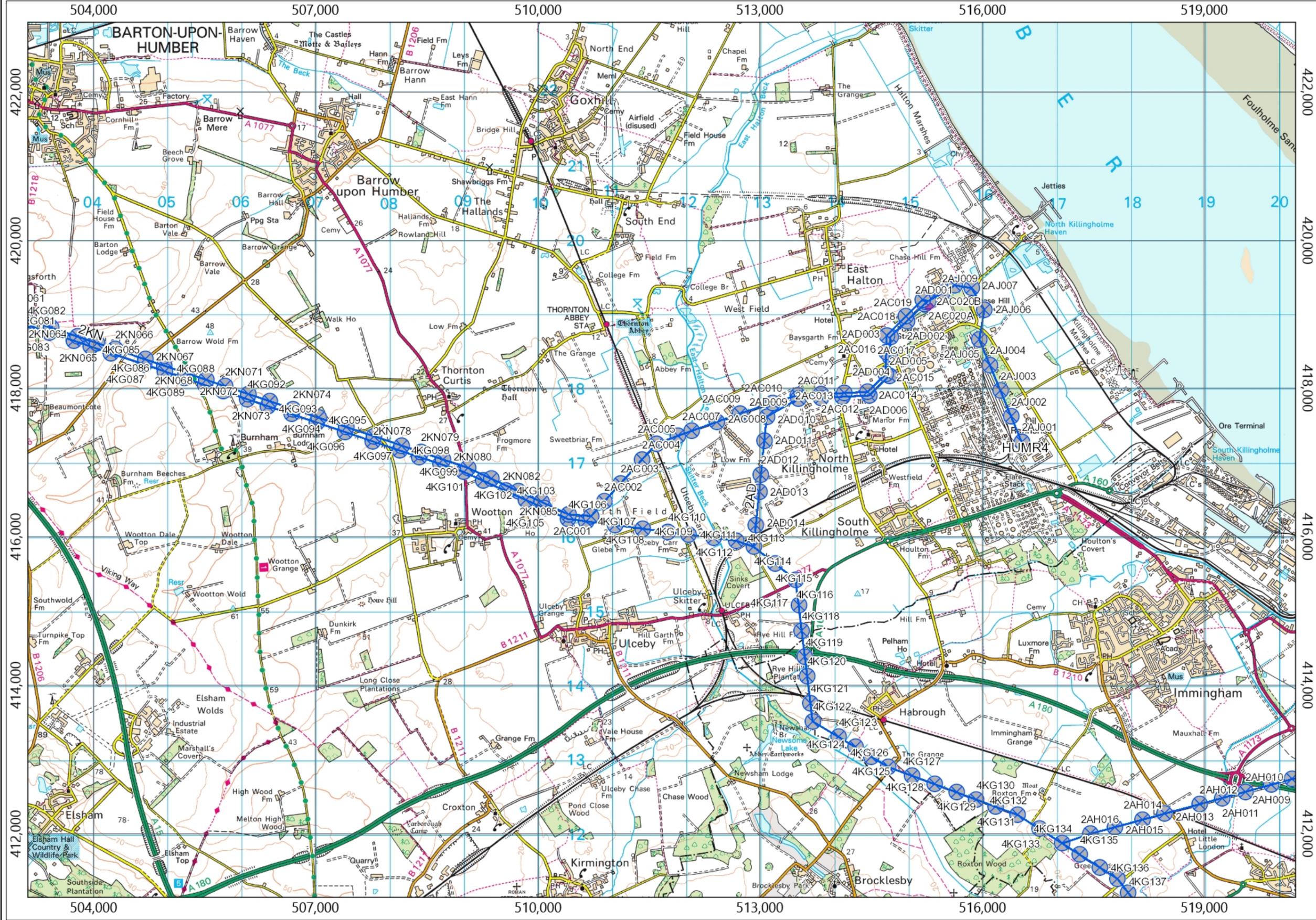
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Time: 14:28:10

Page size: A3 Landscape Scale: 1: 15,000
Print by: **Holdsworth, Anne**



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Legend:

- Substations Commissioned
- OHL 400kV Commissioned
- OHL 275kV Commissioned
- OHL 132kV & Below Commissioned
- Towers Commissioned
- Buried Cable Commissioned
- Fibre Cable Commissioned
- Pilot Cable
- Cable Tunnel

Notes:

Humber Low Carbon Pipelines NGET Asset Plan 4



Land Rights and Acquisitions

Anne Holdsworth
DCO Liaison Officer
UK Land and Property

Direct tel: [REDACTED]

www.nationalgrid.com

SUBMITTED ELECTRONICALLY:
humberlowcarbon@planninginspectorate.gov.uk

04 May 2022

Dear Sir/Madam

APPLICATION BY NATIONAL GRID CARBON LIMITED (THE APPLICANT) FOR AN ORDER GRANTING DEVELOPMENT CONSENT FOR THE HUMBER LOW CARBON PIPELINE PROJECT

SCOPING CONSULTATION RESPONSE

I refer to your letter dated 12th April 2022 in relation to the above proposed application. This is a response on behalf of National Grid Gas PLC (NGG).

Having reviewed the consultation report, I would like to make the following comments regarding NGG infrastructure within or in close proximity to the current red line boundary.

Gas Transmission Infrastructure:

NGG has high pressure gas transmission pipelines and Above Ground Installations (AGI) located within or in close proximity to the scoping area as follows:

Gas Pipelines

- Feeder 7 Drax to Rawcliffe
 Rawcliffe to Goole
 Goole to Guardian Glass
 Goole to Eastoft
 Eastoft to Keadby Power Station
 Beltoft to Susworth Trent West
 Blyborough to Brigg Power Station
- Feeder 29 Asselby to Pannal
 Easington to Ganstead
- Feeder 22 Goxhill to Halton
 Goxhill to Grasby Bottom
- Feeder 9 Goxhill to Thornton Curtis B & C
 Easington to Paull Multijunction
 Paull Multijunction to Goxhill

- Feeder 1 Paull Multijunction to Goxhill (Decommissioned)
Skitter to Thornton (Decommissioned)
Paull Multijunction to Skitter (Decommissioned)
Easington to Paull (Decommissioned)
- Feeder 6 Paull to Saltend
Rosehill to Paull
Sproatley to Rosehill
- Feeder 19 Easington to Paull Multijunction
- Feeder 24 Easington to Paull Multijunction

Above Ground Installations (AGIs)

- Belltoft AGI
 - Paull AGI
 - Goxhill AGI
 - Easington AGI
 - Rosehill AGI
- Plus associated apparatus

The transmission pipelines and AGIs form an essential part of the gas transmission network in England, Wales and Scotland.

I enclose plans showing the locations of the assets.

Specific Comments

The following points should be taken into consideration:

- NGG has a Deed of Grant of Easement for each pipeline, which prevents the erection of permanent / temporary buildings, or structures, change to existing ground levels, storage of materials etc.

Pipeline Crossings:

- Where existing roads cannot be used, construction traffic should ONLY cross the pipeline at previously agreed locations.
- The pipeline shall be protected, at the crossing points, by temporary rafts constructed at ground level. The third party shall review ground conditions, vehicle types and crossing frequencies to determine the type and construction of the raft required.
- The type of raft shall be agreed with NGG prior to installation.
- No protective measures including the installation of concrete slab protection shall be installed over or near to the NGG pipeline without the prior permission of NGG.
- NGG will need to agree the material, the dimensions and method of installation of the proposed protective measure.

- The method of installation shall be confirmed through the submission of a formal written method statement from the contractor to NGG.
- Please be aware that written permission is required before any works commence within the NGG easement strip.
- An NGG representative shall monitor any works within close proximity to the pipeline to comply with NGG specification T/SP/SSW22.
- A Deed of Consent is required for any crossing of the easement.

Cable Crossings:

- Cables may cross the pipeline at perpendicular angle to the pipeline i.e. 90 degrees.
- An NGG representative shall supervise any cable crossing of a pipeline.
- Clearance must be at least 600mm above or below the pipeline.
- Impact protection slab should be laid between the cable and pipeline if cable crossing is above the pipeline.
- A Deed of Consent is required for any cable crossing the easement.
- Where a new service is to cross over the pipeline a clearance distance of 0.6 metres between the crown of the pipeline and underside of the service should be maintained. If this cannot be achieved the service shall cross below the pipeline with a clearance distance of 0.6 metres.

General Notes on Pipeline Safety:

- You should be aware of the Health and Safety Executives guidance document HS(G) 47 "Avoiding Danger from Underground Services", and NGG's specification for Safe Working in the Vicinity of National Grid High Pressure gas pipelines and associated installations - requirements for third parties T/SP/SSW22.
- NGG will also need to ensure that our pipelines access is maintained during and after construction.
- 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 a NGG representative. Ground cover above our pipelines should not be reduced or increased.
- If any excavations are planned within 3 metres of NGG High Pressure Pipeline or, within 10 metres of an AGI (Above Ground Installation), 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 NGG representative. A safe working method agreed prior to any work taking place in order to minimise the risk of damage and ensure the final depth of cover does not affect the integrity of the pipeline.

- Excavation works may take place unsupervised no closer than 3 metres from the pipeline once the actual depth and position has been confirmed on site under the supervision of a NGG representative. Similarly, excavation with hand held power tools is not permitted within 1.5 metres from our apparatus and the work is undertaken with NG supervision and guidance.

To view the SSW22 Document, please use the link below:

<https://www.nationalgrid.com/uk/gas-transmission/land-and-assets/working-near-our-assets>

To download a copy of the HSE Guidance HS(G)47, please use the following link:

<http://www.hse.gov.uk/pubns/books/hsg47.htm>

Further Advice

We would request that the potential impact of the proposed scheme on NGG's existing assets as set out above and including any proposed diversions is considered in any subsequent reports, including in the Environmental Statement, and as part of any subsequent application.

Where any diversion of apparatus may be required to facilitate a scheme, NGG is unable to give any certainty with the regard to diversions until such time as adequate conceptual design studies have been undertaken by NGG. Further information relating to this can be obtained by contacting the email address below.

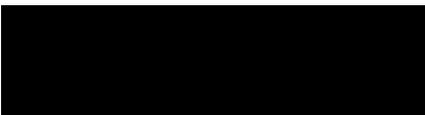
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NGG requests to be consulted at the earliest stages to ensure that the most appropriate protective provisions are included within the DCO application to safeguard the integrity of our apparatus and to remove the requirement for objection. All consultations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

I hope the above is useful. If you require any further information, please do not hesitate to contact me.

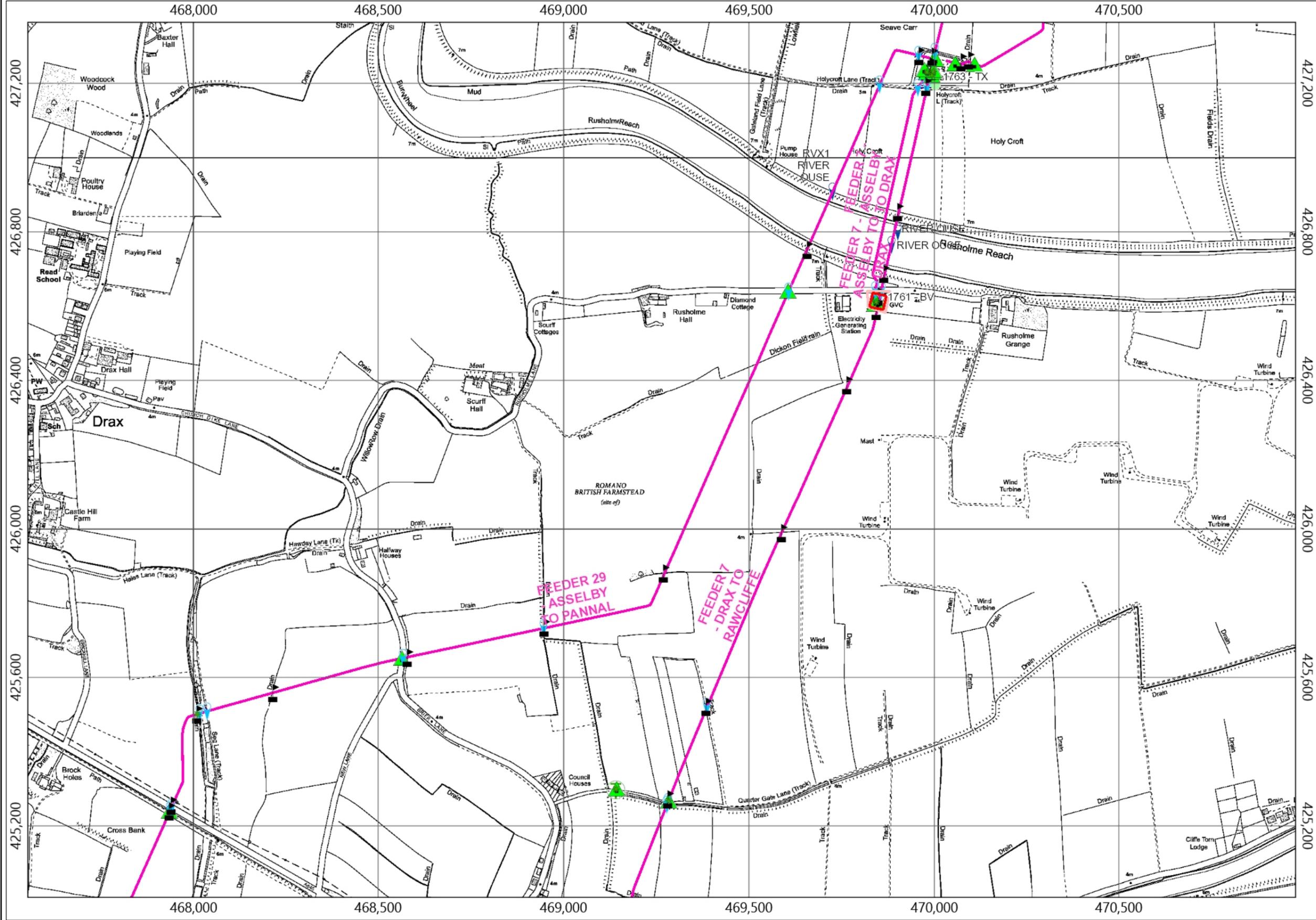
The information in this letter is provided notwithstanding any discussions taking place in relation to connections with gas customer services.

Yours faithfully



Anne Holdsworth
DCO Liaison Officer, Land Rights and Acquisitions

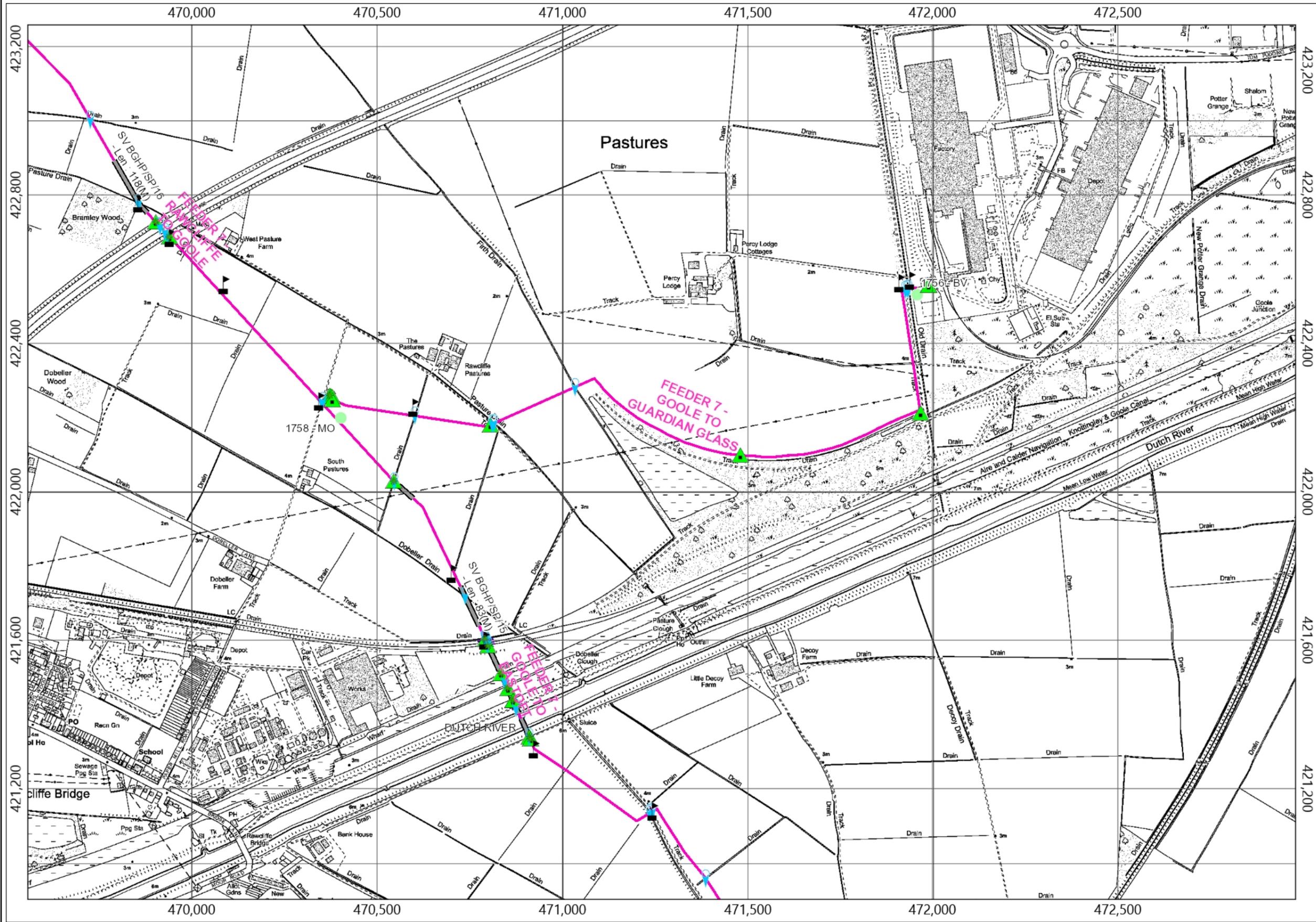
National Grid is a trading name for:
National Grid Gas plc
Registered Office: 1-3 Strand, London WC2N 5EH
Registered in England and Wales, No 2006000



- Legend:**
- Substations Commissioned
 - Circuits
 - Commissioned
 - Decommissioned Group
 - Planned and Spares
 - OHL 400kV Commissioned
 - OHL 275kV Commissioned
 - OHL 132kV & Below Commissioned
 - Towers Commissioned
 - Buried Cable Commissioned
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 - Pipe Crossing Point
 - CP Test Post
 - Transformer Rectifier
 - Pipeline Crossing Sleeve
 - Nitrogen Sleeve
 - Other Sleeves
 - Pipe Line Control Point
 - Named Pipeline Section
 - River Crossings

Notes:
Humber Low Carbon Pipelines NGG Asset Plan 1

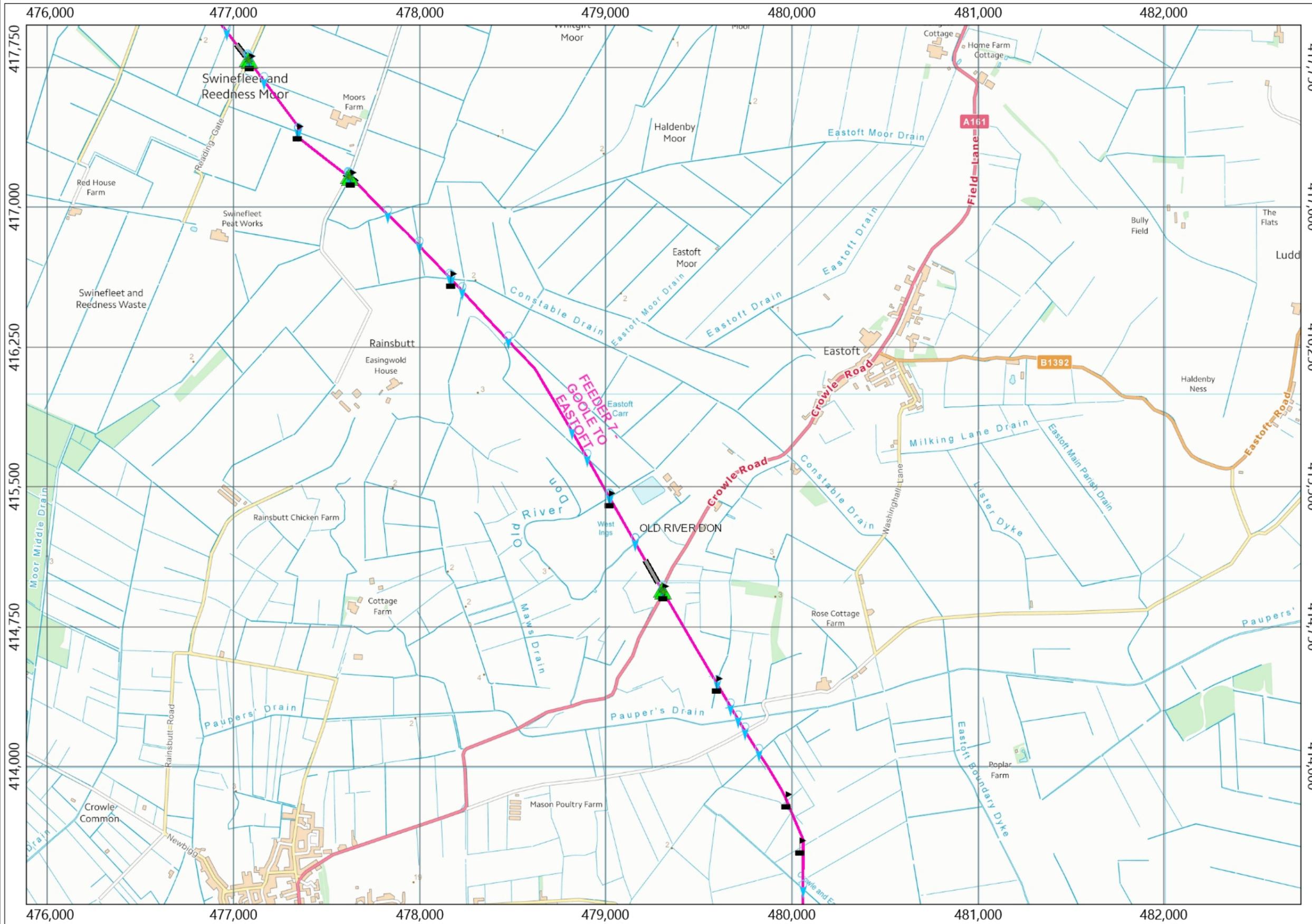




- Legend:**
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 - Circuits
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Notes:
Humber Low Carbon Pipelines NGG Asset Plan 2





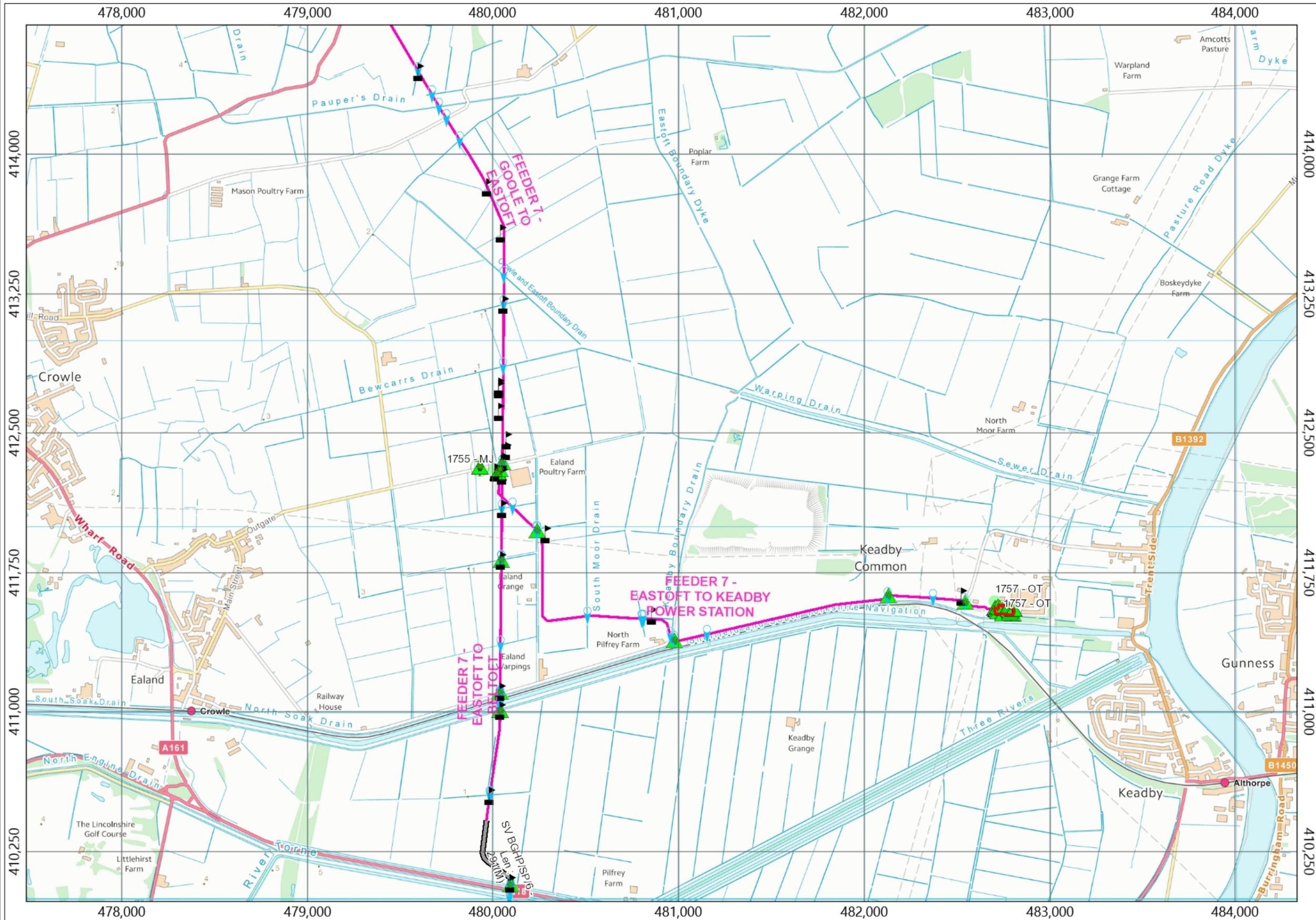
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- Pipeline Crossing
- Sleeve
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- Other Sleeves
- Pipe Line Control Point
- Named Pipeline Section
- River Crossings

Notes:

Humber Low Carbon Pipelines NGG Asset Plan 3





- Legend:**
- Gas Operational Boundary
 - Gas Site Boundary
 - Trial Hole
 - Vantage Point
 - Aerial Marker Post
 - Pipe Crossing Point
 - CP Test Post
 - Transformer Rectifier
 - Pipeline Crossing
 - Sleeve
 - Nitrogen Sleeve
 - Other Sleeves
 - Pipe Line Control Point
 - Named Pipeline Section
 - River Crossings

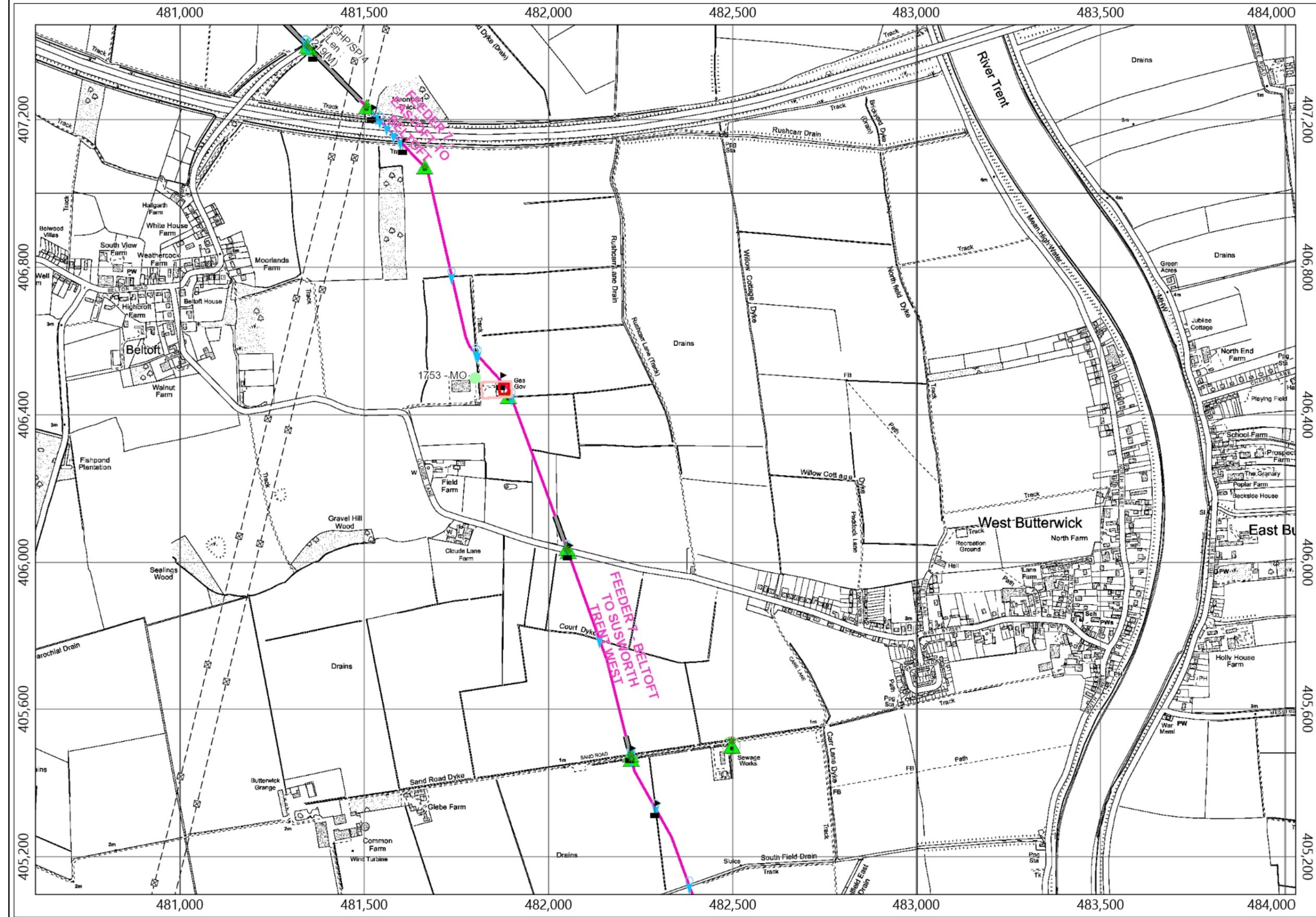
Notes:
Humber Low Carbon Pipelines NGG Asset Plan 4

0 0.51 1.0 Kilometers
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Date: 19/04/2022
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Scale: 1: 20,000
Print by: Holdsworth, Anne



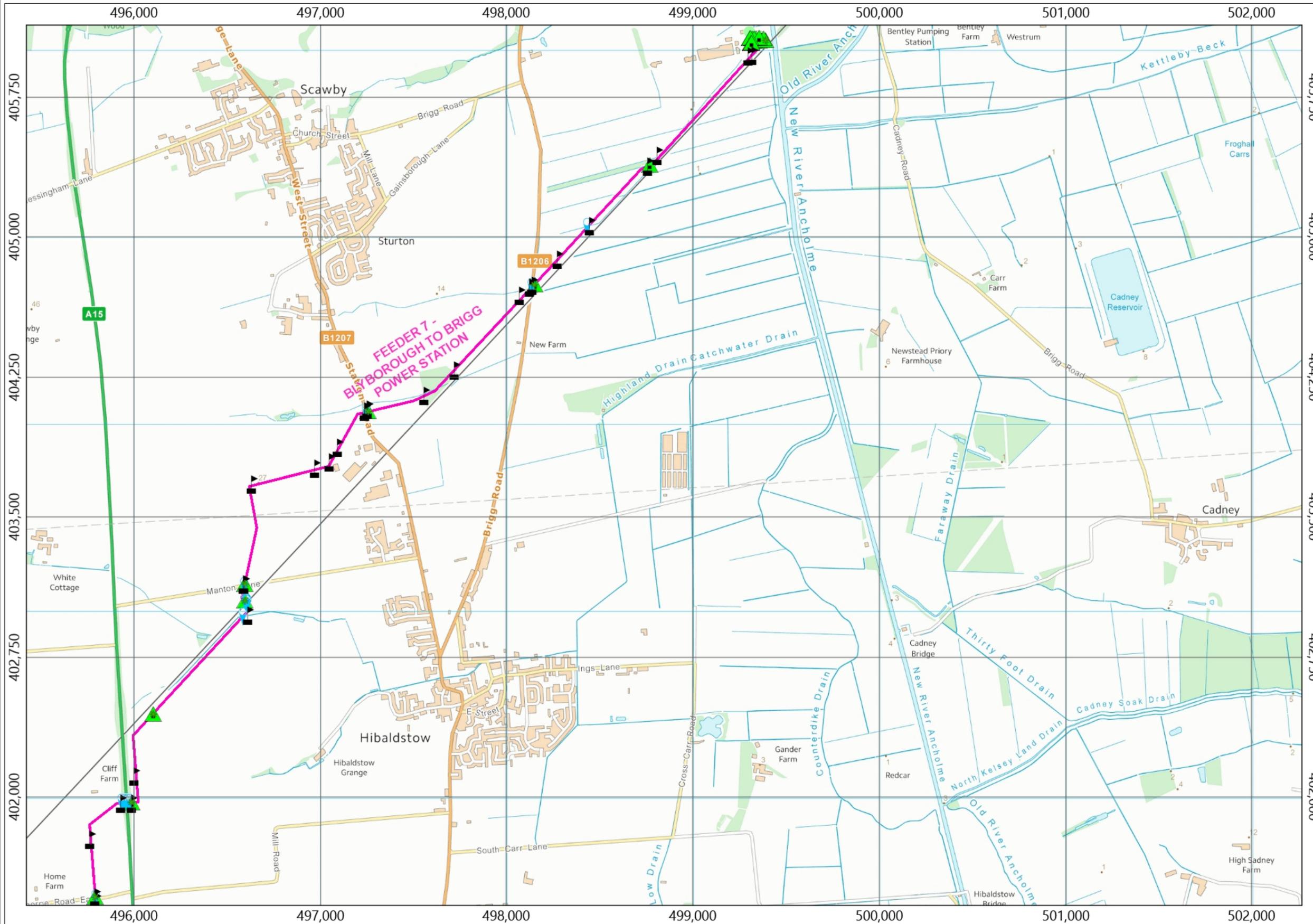
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Note: Any sketches on the map are approximate and not captured to any particular level of precision.



- Legend:**
- Gas Operational Boundary
 - Gas Site Boundary
 - Trial Hole
 - Vantage Point
 - ⊙ Aerial Marker Post
 - ⊙ Pipe Crossing Point
 - ▲ CP Test Post
 - ⊙ Transformer Rectifier
 - Pipeline Crossing Sleeve
 - Nitrogen Sleeve
 - Other Sleeves
 - Pipe Line Control Point
 - Named Pipeline Section
 - ⊙ River Crossings

Notes:
Humber Low Carbon Pipelines NGG Asset Plan 5





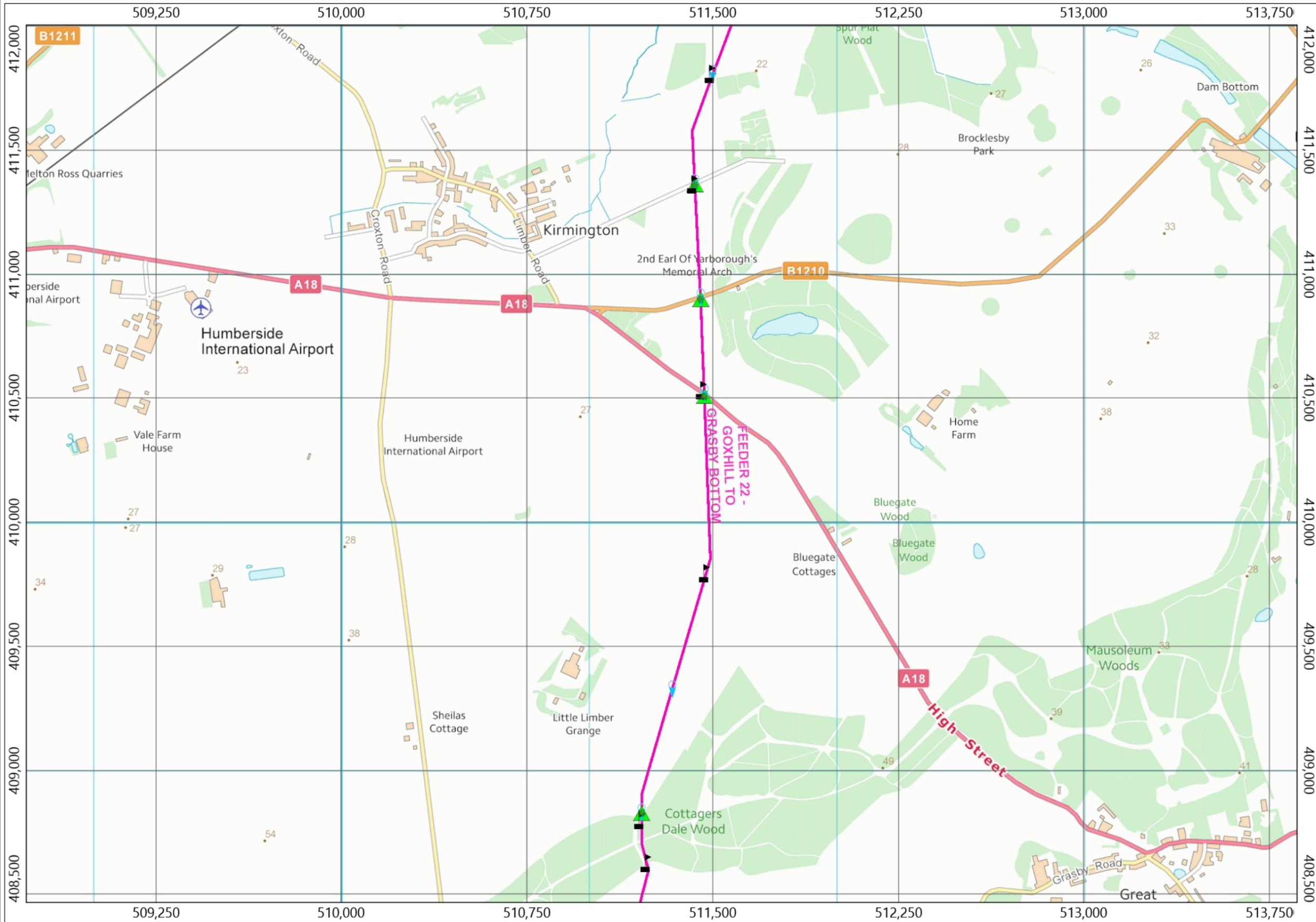
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- Circuits
 - Commissioned
 - Decommissioned Group
 - Planned and Spares
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- OHL 275kV Commissioned
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- Nitrogen Sleeve
- Other Sleeves
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- Named Pipeline Section
- River Crossings

Notes:

Humber Low Carbon Pipelines NGG Asset Plan 6





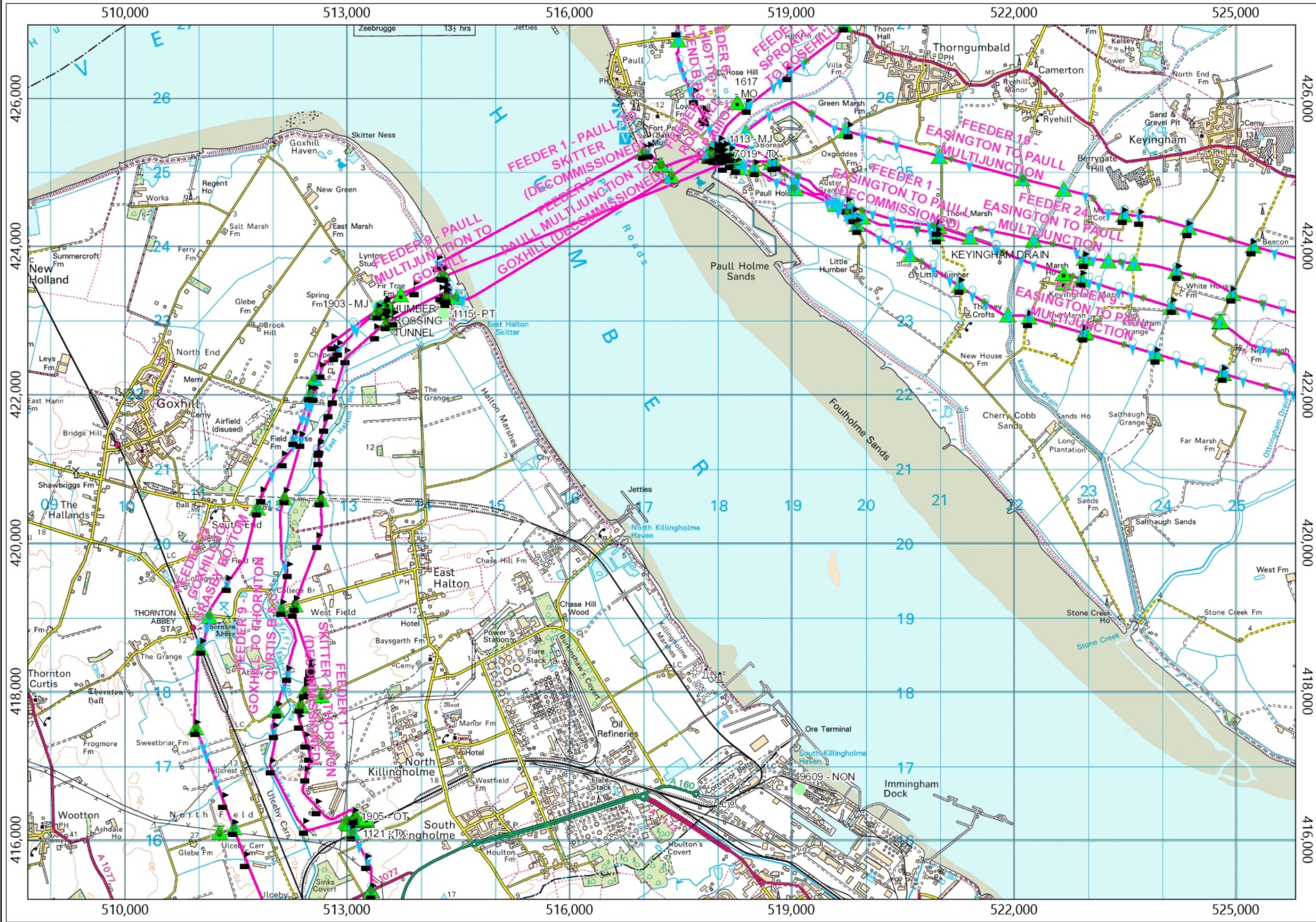
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- Transformer Rectifier
- Pipeline Crossing
- Sleeve
- Nitrogen Sleeve
- Other Sleeves
- Pipe Line Control Point
- Named Pipeline Section
- River Crossings

Notes:

Humber Low Carbon Pipelines NGG Asset Plan 7





- Legend:**
- Gas Operational Boundary
 - Gas Site Boundary
 - Trial Hole
 - Vantage Point
 - Aerial Marker Post
 - Pipe Crossing Point
 - CP Test Post
 - Transformer Rectifier
 - Pipeline Crossing
 - Sleeve
 - Nitrogen Sleeve
 - Other Sleeves
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 - Named Pipeline Section
 - River Crossings

Notes:

Humber Low Carbon Pipelines NGG Asset Plan 8

0 1.27 2.5 Kilometers

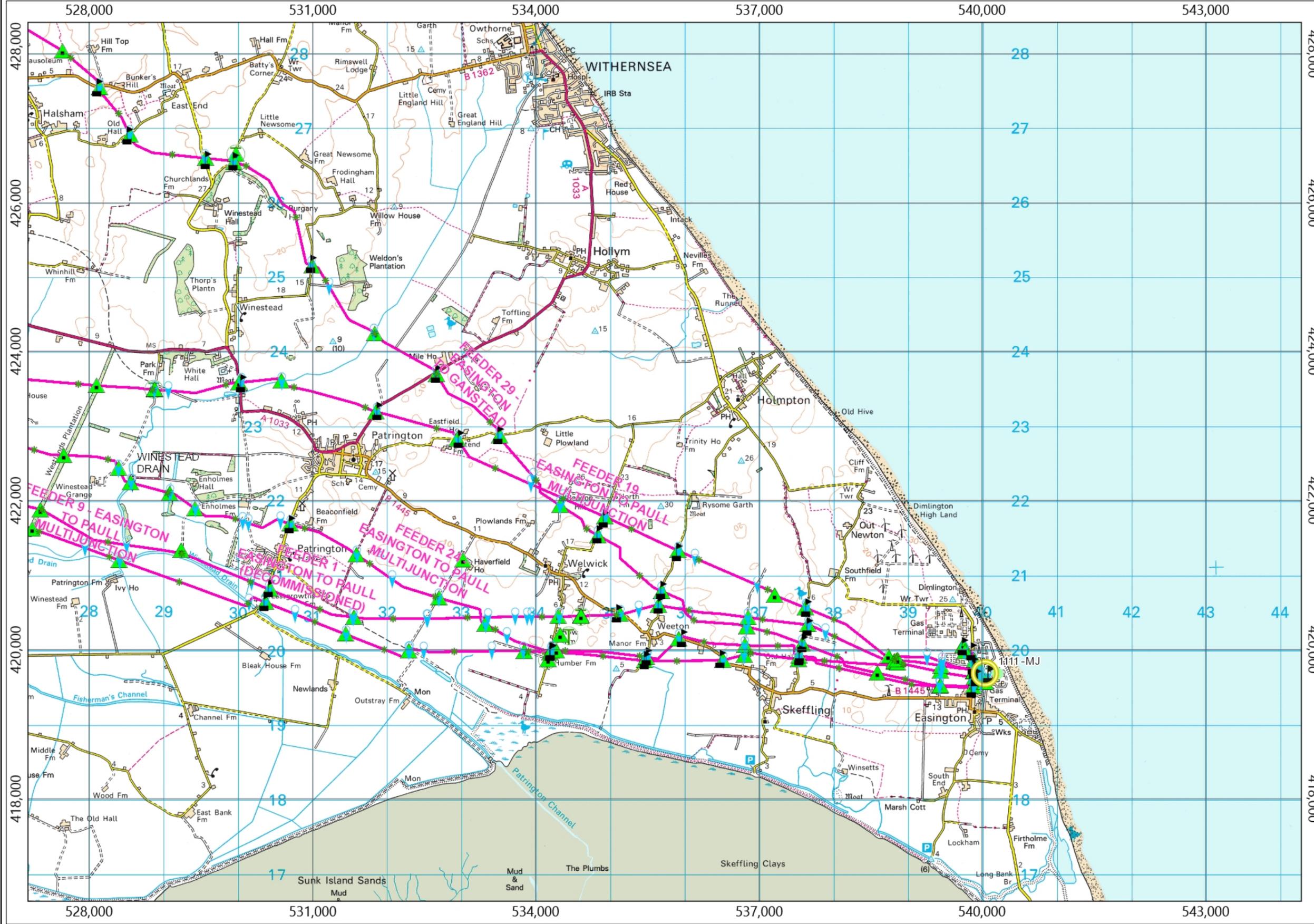
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 Time: 15:48:32 Print by: Holdsworth, Anne



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- Legend:**
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 - Gas Site Boundary
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Notes:
Humber Low Carbon Pipelines NGG Asset Plan 9



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Scale: 1: 50,000
Print by: Holdsworth, Anne



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Note: Any sketches on the map are approximate and not captured to any particular level of precision.

Emma Cottam
Environmental Services
Central Operations
Temple Quay House
2 The Square
Bristol
BS1 6PN
Sent via e-mail to:
HumberLowCarbon@planninginspectorate.gov.uk

Telephone: [REDACTED]
Email: [REDACTED]

Our ref: 22/00757/NPA
Your ref: EN070006

Date: 27th April 2022

Dear Ms Cottam

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

Application by National Grid Carbon (NGC) (The Applicant) for an Order granting Development Consent for the Humber Low Carbon Pipelines (the Proposed Development)

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

I refer to the above consultation received by this Authority on 12th April 2022 which relates to the proposed project expected to comprise of the following:

- An onshore pipeline system to transport carbon dioxide from industrial and power sector Connected Projects, including hydrogen production plants in the Humber area.
- An onshore pipeline system to transport hydrogen from production plants (Connected Projects) to end users (aligned with the carbon dioxide pipeline).
- A tunnel beneath the Humber Estuary including a drive shaft and a reception pit.
- Above ground installations (AGI) including:
 - A suitable Pumping Facility next to or close to the Holderness coast, to increase the pressure of the carbon dioxide for transportation offshore to the storage facility;
 - Pipeline inspection gauge (PIG) traps, strategically located along the pipeline system, to ensure pipelines can be cleaned and inspected;
 - Connection arrangements in the vicinity of the Connected Projects;
 - Multi-junction installations at both sides of the River Humber crossing (later referred to as Killingholme and Saltend AGIs); and
 - Block valves (nominally located every 16-18km along the Scoping Route Corridor) to allow sections of the pipeline to be isolated for maintenance.

- A landfall on the Holderness coast which is the 'landing' point for the offshore carbon dioxide pipeline transportation system so it can connect into the Pumping Facility and is where the carbon dioxide transportation pipeline infrastructure transitions from the onshore to the marine environment.

I can advise that Newark & Sherwood District Council have no comments to make on the Environmental Impact Assessment Scoping Report Volume I, Volume II Part 1, Volume II Part 2, Volume II Part 3, Volume II Part 4, Volume II Part 5, Volume III (by National Grid Dated April 2022).

Please note that this matter has not been formally reported to the District Council's Planning Committee. In these circumstances the comments are those of an Officer of the Council under delegated power arrangements.

If you require any further assistance please do not hesitate to contact my colleague, Isabel Verheul, the case officer, who has dealt with this consultation, on [REDACTED]

Yours sincerely

[REDACTED]

Pp. Lisa Hughes
Business Manager – Planning Development

Feekins-Bate, Laura

From: Richard Wright <[REDACTED]>
Sent: 10 May 2022 11:44
To: Humber Low Carbon Pipelines
Subject: RE: EN070006 - Humber Low Carbon Pipeline - EIA Scoping Notification and Consultation
Attachments: RouteCorridor.pdf

ND-5939-2022-PLN

Dear Sir/Madam,

[Re: EN070006 - Humber Low Carbon Pipeline - EIA Scoping Notification and Consultation](#)

Thank you for the opportunity to comment on the above proposal. Some areas of the above-mentioned scheme fall within the North East Lindsey Drainage Board district, including some of the Board's maintained watercourses. Localised and detailed interactive mapping, illustrating the district and watercourses in relation to the overall area of the proposed scheme can be viewed on our website ([Witham & Humber Drainage Boards \(witham3idb.gov.uk\)](http://witham3idb.gov.uk)). Also, we have attached an illustration of the Board's district (dark yellow), extended area (light yellow) and Board maintained watercourses (red) in relation to the proposed route.

Within the Board's district and under the terms of the Land Drainage Act. 1991, the prior written consent of the Board is required for any proposed temporary or permanent works or structures within any watercourse including infilling or a diversion. Outside the Board's district, Land Drainage Consent will fall to North East Lincolnshire Council to advise.

Under the terms of the Board's Byelaws, the prior written consent of the Board is required for any proposed temporary or permanent works or structures in, under, over or within the byelaw distance of 9m from the top of the bank of a Board maintained watercourse. A copy of the Board's byelaws and Land Drainage Consent application forms can be viewed and downloaded from the above web site hyperlink and following the link to North East Lindsey Internal Drainage Board web pages.

All drainage routes through the Sites should be maintained both during the works and after completion of the works. Provisions should be made to ensure that upstream and downstream riparian owners and those areas that are presently served by any drainage routes passing through or adjacent to the sites are not adversely affected by the development.

The Board requires unbroken, unhindered and unrestricted access for the Board's plant and machinery to maintained Board maintained drains at all times.

Regards,

Richard Wright
Operations Engineer

*Witham First District Internal Drainage Board
Witham Third District Internal Drainage Board
Upper Witham Internal Drainage Board
North East Lindsey Drainage Board*

Four independent statutory Land Drainage and Flood Risk Management Authorities working in partnership.

From: Humber Low Carbon Pipelines <HumberLowCarbon@planninginspectorate.gov.uk>
Sent: 12 April 2022 11:05
Cc: Humber Low Carbon Pipelines <HumberLowCarbon@planninginspectorate.gov.uk>
Subject: EN070006 - Humber Low Carbon Pipeline - EIA Scoping Notification and Consultation

Dear Sir/ Madam

Please see attached correspondence on the proposed Humber Low Carbon Pipeline project.

Please note that the deadline for consultation responses is **Tuesday 10 May 2022**, and is a statutory requirement that cannot be extended.

Kind regards
Laura



Laura Feekins-Bate | EIA Advisor
The Planning Inspectorate

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KINGSTON UPON HULL



Case officer: Andrew Law
Telephone: [REDACTED]
Email: planning@northlincs.gov.uk

North Lincolnshire Council

Your Ref: EN070006
Our Ref: PA/SCO/2022/6

www.northlincs.gov.uk

Date: 10 May 2022

The Planning inspectorate
Environmental Services
Central Operations
Temple Quay House
2 The Square
Bristol
BS1 6PN

Helen Mancerson
Director of Business Development
Church Square House
30-40 High Street
Scurthorpe
North Lincolnshire
DN15 6NL

Sent by email only – humberlowcarbon@planninginspectorate.gov.uk

Dear Sir/Madam

Scoping Consultation – Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 – The Humber Low Carbon Pipeline project.

Thank you for your letter dated 30 March 2022 seeking a view from North Lincolnshire Council in respect of the information to be provided in an Environmental Statement to be produced in support of a Development Consent Order application by National Grid Carbon Limited for the Humber Low Carbon Pipeline.

Having considered the submitted scoping report North Lincolnshire Council would like to make the following comments regarding the information that should be included within the Environmental Statement:

Air Quality

Chapter 5 of the Scoping Report addresses the potential air quality impacts of the proposed scheme.

The following topics have been scoped in as requiring further assessment:

- Fugitive dust emissions during construction and decommissioning using the Institute of Air Quality Management Guidance on the assessment of dust from demolition and construction, 2014 (Ref 5.15).

The following topics have been scoped out as requiring no further assessment:

- Emissions from non-road mobile machinery (NRMM) associated with construction and decommissioning

- Vehicle emissions associated with construction, operation and decommissioning

The Council's Environmental Health Officer has confirmed that they would expect to see details of vehicle trips and screening criteria in order to confirm vehicle emissions can be scoped out.

In all other respects the Local Planning Authority is content with the proposed approach to the assessment of potential air quality impacts.

Contaminated Land

Chapter 8 of the Scoping Report addresses the potential land contamination impacts of the proposed scheme.

This chapter confirms the following:

“Utilising baseline information and consultation with statutory consultees, a combination of qualitative and quantitative risk assessment will be undertaken to assess the potential effects of the existing ground conditions on the Project, and the potential effects of the Project on the Geology and Hydrogeology.

In relation to ground contamination, the risk assessment will be based on the source-pathway-receptor methodology outlined in Land Contamination Risk Management (LCRM) (Ref 8.36) and promoted by Defra and the Environment Agency. For there to be an identifiable risk, not only must there be contaminants present (source) there must also be a receptor and a viable pathway which allows the source to impact on the receptor.”

The local planning authority has agrees with the proposed approach to the assessment of the potential impacts of the development in respect of land contamination.

Cultural Heritage

Chapter 8 of the Scoping Report addresses the proposed approach to the assessment of cultural heritage impacts.

A summary of the Council's position with regards to the proposed approach to cultural heritage is provided below. This response is expanded upon in more detail in the appended response from the Council's Historic Environment Officer.

The proposed pipeline has the potential for indirect impacts on designated heritage assets and their settings and for direct, physical impacts on known and potential unknown non-designated archaeological heritage assets along the pipeline route through varied topography the length of North Lincolnshire.

The Scoping Report proposes desk-based and geoarchaeological assessment for EIA of the Cultural Heritage set out in Chapter 9; the scope as proposed is considered to be inadequate.

The Heritage Working Group has advised that further pre-application archaeological surveys (archaeological field evaluation) will be necessary to inform the EIA and an adequate heritage assessment in accordance with the relevant national and local planning policies.

Pre-application archaeological evaluation is required in North Lincolnshire to identify currently unknown archaeological remains and to adequately assess the heritage significance of the identified heritage assets of below-ground archaeological interest, and to assess the impacts of the proposals. The pre-application archaeological evaluation should comprise a programme of non-intrusive and intrusive field surveys.

Measures to enhance and conserve the heritage assets and their settings based on the results of the archaeological evaluation and assessment should inform the planning and design of the development.

Mitigation strategies to off-set any justifiable harm that entail further archaeological and/or palaeoenvironmental excavation and recording prior to or during construction work should be submitted with the DCO application and the archaeological works detailed in a Written Scheme of Investigation (WSI).

The CEMP should refer to any archaeological exclusion zones and sensitive areas and make provision for appropriate protection measures; WSIs for archaeological mitigation work should be appended to the CEMP.

As stated above a copy of the Historic Environment Officers detailed advice has been provided which provides more detail and justification for the position outlined above.

Ecology and Nature Conservation

Chapter 6 of the Scoping Report discusses Ecology & Biodiversity. Having reviewed this Chapter of the report the Council's Ecologist has confirmed that they support the approach to the assessment of ecological impacts.

As described in the report, the applicant(s) should provide the information reasonably required for a Habitats Regulations Assessment.

Furthermore, the proposed approach to protected and priority habitats and species is considered appropriate.

The proposal to collect survey information for, and to deliver, a 10% net gain in biodiversity is welcomed as is the aim to add natural capital.

The Council's Ecologist has also confirmed support for the approach taken in the draft Conservation Strategy and will continue to provide the Applicant with detailed site-specific advice on habitat creation and enhancement.

Hydrology and Drainage

Chapter 16 of the Scoping Report sets out the proposed approach to the assessment of hydrology and land drainage.

The Council's Drainage Officer has confirmed agreement to the proposed approach to the assessment of potential impacts on land drainage. In particular they agree that the ES needs to fully identify/consider any water resources including surface waters (e.g. rivers, lakes/ponds, land drainage systems, coastal or underground waters) in the area that could be affected by the project, particularly in respect of their volume and flood risk.

Landscape and Visual Amenity

The approach to the assessment of landscape and visual amenity issues set out in Chapter 10 of the Scoping Report is considered to be satisfactory, including the proposals for selecting representative views.

Noise

Chapter 11 of the Scoping Report addresses the potential noise impacts of the proposed scheme.

The following matters have been scoped in as requiring further assessment:

- Human receptors affected by the construction of the Project.
- Human receptors affected by noise from the Pumping Facility.
- Potential for significant adverse noise effects due to proposed noise emitting plant and equipment installed at the Pumping Facility.
- Human receptors affected by decommissioning activities at the AGIs.

BS 5228:2009+A1:2014, and BS:2014+A1:2019, will be used for construction and operational noise assessment respectively. The Council also notes the comments regarding a low frequency noise assessment which will be undertaken if the spectral noise data for the plant/equipment installations associated with the Pumping Facility will contain significant levels of low frequency content.

The following matters have been scoped out as not requiring further assessment:

- Human receptors affected by operational traffic flows.
- Human receptors affected by the operation of the pipelines.
- Human receptors affected by the operation of the PIG traps and block valves.
- Human receptors affected by operational vibration.

The Council's Environmental Health Officer has reviewed the proposed approach to the assessment of noise impacts and has confirmed that this approach is satisfactory.

Traffic and Transport

Chapter 14 of the Scoping Report addresses the potential traffic and transport impacts of the proposed scheme.

The Council's Highway Development Officer has confirmed that the approach to assessing traffic and transport impacts is acceptable.

Socio Economic

Chapter 12 of the Scoping Report addresses the potential socio economic impacts of the proposed scheme.

The Council's Economic Development Team has reviewed this proposed approach and has confirmed that it is generally acceptable.

It is noted however that the approach to assessing tourism impacts appears to be limited in scope to the stretch of coastline on the landward side of the Project. There may be potential for impact on tourism elsewhere (away from the coast) and this element of the assessment may need to be expanded or a justification for the limited scope of assessment provided.

Cumulative Effects

The LPA is satisfied with the approach to the assessment of cumulative effects, but would expect to be consulted with regards to agreeing the short list of other existing development and/or approved development.

This scoping response has been prepared in line with my knowledge and understanding of the site and environment, the nature of existing operations on adjacent sites and the nature of development at the time of writing.

Please do not hesitate to contact me should you wish to discuss the contents of this letter.

Yours sincerely

A solid black rectangular box used to redact the signature of Andrew Law.

Andrew Law
Development Management Specialist

MEMO

**North
Lincolnshire
Council**

TO: ANDREW LAW, DEVELOPMENT MANAGEMENT
FROM: ALISON WILLIAMS, HISTORIC ENVIRONMENT RECORD
REF: PA/SCO/2022/6
DATE: 09/05/2022

SUBJECT: EIA Scoping request for a Humber Low Carbon Pipeline, Humber Region – National Grid Carbon Ltd

SUMMARY OF ADVICE

- The proposed pipeline has the potential for indirect impacts on designated heritage assets and their settings and for direct, physical impacts on known and potential unknown non-designated archaeological heritage assets along the pipeline route through varied topography the length of North Lincolnshire
- The Scoping Report proposes desk-based and geoarchaeological assessment for EIA of the Cultural Heritage set out in Chapter 9; the scope as proposed is considered to be inadequate
- The Heritage Working Group has advised that further pre-application archaeological surveys (archaeological field evaluation) will be necessary to inform the EIA and an adequate heritage assessment in accordance with the relevant national and local planning policies (NPS-EN-1, section 5.8.8-10; NPPF, para 194; North Lincolnshire Core Strategy CS6, and Local Plan HE8 and HE9)
- Pre-application archaeological evaluation is required in North Lincolnshire to identify currently unknown archaeological remains and to adequately assess the heritage significance of the identified heritage assets of below-ground archaeological interest, and to assess the impacts of the proposals
- The pre-application archaeological evaluation should comprise a programme of non-intrusive and intrusive field surveys
- Measures to enhance and conserve the heritage assets and their settings based on the results of the archaeological evaluation and assessment should inform the planning and design of the development
- Mitigation strategies to off-set any justifiable harm that entail further archaeological and/or palaeoenvironmental excavation and recording prior to or during construction work should be submitted with the DCO application and the archaeological works detailed in a Written Scheme of Investigation (WSI)
- The CEMP should refer to any archaeological exclusion zones and sensitive areas and make provision for appropriate protection measures; WSIs for archaeological mitigation work should be appended to the CEMP.

HISTORIC ENVIRONMENT RECORD (HER) FUNCTION: To hold, maintain, interpret and manage heritage information, enhancing the understanding of the area's historical development as a distinctive and attractive place. HER information provides source material for interpretation by heritage professionals and for use by community groups and individuals. The HER database is updated as new information about the historic environment is discovered.

The HER also provides advice on development proposals that affect, or may affect, the sites and settings of all heritage assets i.e. designated and non-designated historic buildings, archaeological sites and monuments, and historic places, areas and landscapes. This advice is provided against saved local plan policies and national historic environment policies. See <https://www.northlincs.gov.uk/planning-and-environment/historic-environment-and-conservation/>

DETAILED ADVICE:

Thank you for consulting the HER on this scoping report that includes the Cultural Heritage (Chapter 9). The applicant has set up a Heritage Working Group (HWG) with the local authority HERs affected by the pipeline proposals and the HWG has been able to comment on Cultural Heritage EIA Methodology documents prior to the submission of this Scoping Report.

Given the known and currently unknown archaeological potential along the extensive pipeline route that passes through the varied geography of the region, each with specific archaeological characteristics and potential for undiscovered archaeology, the HWG advised that pre-application archaeological field evaluation would be expected to be undertaken to provide the necessary information for an adequate EIA. North Lincolnshire HER provided detailed comments on the latest Methodology document dated March which are relevant to the Scoping Report.

Heritage Baseline

The pipeline corridor traverses North Lincolnshire on a generally east-west alignment. As such it passes through a variety of north-south aligned topography and geology that influences the nature, date and character of archaeological sites, the depth and visibility of below-ground archaeological remains and preservation conditions. The variation in the archaeological record along the route includes upland and lowland areas suitable for settlement, extensive wetlands and floodplains rich in resources and with potential for excellent archaeological and palaeoenvironmental preservation in peat and waterlogged deposits, rivers and valleys providing access and communication routes to a wide hinterland, the Humber Estuary and beyond.

The archaeological and palaeoenvironmental record across this region ranges from Palaeolithic stone implements such as are recorded at Kirmington, buried Mesolithic landscapes beneath the peats of the Humberhead Levels and river valleys, Neolithic and Bronze Age occupation such as on the gravels at Barnetby le Wold, the earliest dated iron smelting furnace in the country at Messingham/Manton, extensive Iron Age and Romano-British settlement throughout the route including beside the Estuary, Medieval villages and religious foundations, to post-medieval warping drains for agricultural landscape improvements in the Trent valley.

The majority of archaeological heritage assets recorded in North Lincolnshire are below-ground archaeological remains on agricultural land rather than upstanding earthworks and as such do not lend themselves to easy identification by field observation or walkover survey. They are generally identified from the air or through archaeological prospection techniques such as systematic fieldwalking, metal detecting, geoarchaeological and geophysical surveys and archaeological excavation. There are large parts of the pipeline route that have not been subject to any archaeological investigation, and in wetland areas and areas of deeper deposits archaeological remains may be deeply buried and masked from traditional archaeological prospecting requiring more specialist survey techniques.

Accordingly, it is considered that there is high potential for unrecorded archaeological heritage assets to be present throughout the route of the proposed pipeline across North Lincolnshire and that archaeological field evaluations will be required to identify currently unknown archaeological heritage assets in accordance with relevant national and local planning policy including NPS EN-1, section 5.8.8-10, paragraph 194 of the NPPF, North Lincolnshire Core Strategy CS6 and saved Local Plan policies HE8 and HE9 (see Appendix 1 below).

Scoping Report

The 500m Study Area from the Scoping Route Corridor is agreed to be appropriate (Scoping Report, 9.4.). The archaeological consultant has obtained the North Lincolnshire HER records and spatial data for the EIA study area around the development. As the HER database is dynamic and continually updated with new information and results of archaeological investigations, it is important that the data obtained for the project should be periodically refreshed to ensure that the heritage baseline is maintained throughout the duration of the project.

The designated and known non-designated heritage assets within the Study Area are quantified and outlined in the Scoping Report (9.5, Receptors). As yet unknown archaeological heritage assets along the pipeline route should also be included as potential terrestrial archaeology receptors and should be identified and assessed through the EIA process in accordance with the national and local planning policies, including through archaeological field evaluation.

The important and locally designated historic landscape heritage asset of the Isle of Axholme is identified as a Built Heritage Receptor to be considered within the built heritage section (nb. the NLC Historic Environment Officer advises on historic landscape issues rather than the Conservation Officer).

Unknown archaeological remains of all archaeological periods are scoped in under Terrestrial archaeology (Table 9.2).

Intertidal Archaeology is not identified as a receptor within North Lincolnshire and is scoped out on the assumption that the proposed tunnel works would take place landward of the Humber floodbank (Table 9.2).

Section 9.6 sets out the relevant resources and data to be collated within the PEIR and ES. With the exception of the walkover survey, these are all desk-based studies. The HWG has already advised that in addition to relying on the available records of known heritage assets, the EIA will need to identify any currently unknown heritage assets such as buried archaeological remains through a staged and iterative programme of archaeological field evaluation. The proposal to hold further discussion with the HWG following these deskbased studies regarding a phase of fieldwork (final bullet point) that we have already outlined to the applicant suggests a limited approach and scope to evaluation the results of which would not be available to inform the ES or in good time to inform the subsequent DCO application process.

The proposal for a walkover survey is welcome as a preliminary stage of the assessment prior to archaeological field evaluation. The walkover should identify and assess the condition of upstanding earthworks such as ridge and furrow, to identify any unrecorded upstanding earthworks or other archaeological remains, and assess the ground conditions and any constraints along the pipeline corridor to undertaking further archaeological evaluation techniques such as borehole surveys, fieldwalking and geophysical survey.

Whilst a walkover survey can produce useful information as above, it cannot identify unrecorded buried archaeological remains and in an largely agricultural landscape such as exists across much of North Lincolnshire, a walkover will be of limited use as an assessment technique to identify below-ground remains. It does not replace the need for more appropriate evaluation techniques such as geophysical survey to identify potential archaeological remains, or trial trenching to more accurately confirm the presence, extent, date, character and significance of known and currently unknown archaeological heritage assets.

It will be necessary to identify known and currently unknown archaeological heritage assets and apply the appropriate archaeological evaluation techniques to understand their condition and archaeological significance prior to assessing the impact and considering what mitigation measures may be proportionate to the level of impact on the archaeological significance (Section 9.7). It is important to note that the aim of archaeological field evaluation is to provide information for the EIA and is not a mitigation measure.

The proposed inclusion of the OHMS with the CEMP is welcome (9.7.1). However, to be meaningful, an OHMS will need to be based upon the results of an adequate archaeological evaluation and assessment.

In relation to commitment 7 (9.7.3) it should be noted that where appropriate mitigation requires detailed archaeological excavation, this would need to be carried out in advance of construction commencing; to avoid delays to construction it is important that archaeological evaluation has been completed to inform the preparation of the design and mitigation stages.

Permanent effects to archaeological assets (9.8.1) include destruction of archaeological evidence in whole or part. It may be appropriate to reinstate the form of earthworks impacted by the construction to ensure that the operational effects do not continue to affect the setting of heritage assets such as an area of ridge and furrow that the pipeline has passed through (9.8.2).

Regarding matters scoped in or out of further assessment for North Lincolnshire (Table 9.2), Historic landscape character is scoped out; I have raised the point that the value of the contribution of historic landscape features to the character, setting and legibility of the historic landscape will need to be adequately assessed taking account of the significance of the historic landscape character type. For example the contribution of upstanding ridge and furrow and historic hedgerows to the significance of the Lincolnshire HLC Ancient Enclosures character type. Other matters in Table 9.2 are agreed, noting that the intertidal archaeology is scoped out on the North Lincolnshire side of the Estuary on the assumption that the tunnel portal will not impact this zone.

The proposed methodology for assessment of the baseline conditions set out in the Scoping report would only assess the known heritage assets unless a programme of archaeological evaluation is undertaken to identify current unknown archaeology along the pipeline route for the EIA (9.9.1). Moreover, without archaeological field evaluation, the information available for heritage assets is unlikely to include sufficient evidence of character, date, extent, depth and preservation to allow an informed assessment of Heritage Value or Magnitude of Impact.

The High Value criteria in Table 9.3 should include well preserved historic landscape character areas (such as the Area of Special Historic Interest of Isle of Axholme) that exhibit considerable coherence, time-depth or other critical factors.

In some cases, it will not be possible to assign Low Value to assets compromised by poor preservation and/or poor survival of contextual associates (Table 9.3) without physical evidence of the preservation conditions that can only be obtained from archaeological field evaluation.

Unstratified archaeological finds such as from the ploughsoil should not be arbitrarily categorised as of Negligible Value (Table 9.3) where consideration of their location, distribution and concentrations may indicate the potential for the presence of below-ground archaeological remains conferring on such finds evidential value. Unknown Value will apply to many known and currently unknown archaeological heritage assets that have not been adequately evaluated through fieldwork such that their significance or importance remains unknown and would be insufficient to apply these EIA matrices.

Magnitude of Impact (Table 9.4) also requires the evidence of archaeological evaluation for the correct assessment of criteria where High equates to total destruction of archaeological interest thus meeting the test of substantial harm set out in the NPPF, and the Medium and Low criteria involve the destruction of archaeological evidence and interest but where overall damage is less than substantial harm in the NPPF tests.

For the reasons above, I disagree with the assertion that desk based collation of available data together with archaeological walkover is sufficient for a robust assessment (first bullet, 9.10.1), or that the assessment should be based on assumptions (third bullet). It is precisely because the nature, extent and survival of archaeological remains is unknown that the HWG has advised pre-application archaeological field evaluation to provide adequate information for the EIA and DCO examination.

Scoping Advice

The EIA submitted for this proposed development should be informed by adequate archaeological assessment including archaeological field evaluation prepared in line with the HWG and North Lincolnshire HER advice given in this memo. The aim of the archaeological field evaluation will be to identify and assess the significance of the known and as yet unknown archaeology to inform the assessment of impact of construction and design the mitigation strategy including avoidance measures and/or the development of programme of work for archaeological excavations and recording.

The assessment should comprising all the following stages:

1. Desk Based Research

- Collation and synthesis of existing historic environment data sources relating to **all** heritage assets that the proposed development may affect directly or indirectly. The spatial scope should

- be 500m Study Area from the Scoping Route Corridor to provide the archaeological context for the subsequent fieldwork, including appropriate research objectives. Sources should include but not be limited to: local and national databases; local archives; historic maps and plans including illustrating the development of the modern industry; assessment of aerial photographs, drone survey and LIDAR data; other published and unpublished documents.
- Geo-archaeological assessment of existing data for the site to produce a preliminary deposit model of the sub-surface of the pipeline corridor and identify gaps for further investigation
 - Walkover to identify the presence of any above or below ground archaeological remains or historic landscape features within the application area and/or any constraints on the following stages of archaeological fieldwork

2. Pre-Application Archaeological Field Evaluation

- Archaeological monitoring and recording opportunities during geo-technical investigations.
- Hand augering or machine drilled purposive coring to fill any identified gaps in the deposit model, to identify and model the deposit sequence and former land surfaces, and provide an understanding of the development of the landscape; and to obtain appropriate samples for assessment of preservation potential and the potential for palaeo-environmental evidence to inform the archaeological record including all relevant palaeo-environmental indicators and provision for a programme of scientific dating of the deposit sequence as appropriate.
- Measured survey of upstanding earthwork remains to assess survival, condition and potential for reinstatement following construction
- Geophysical survey of the working width of the pipeline corridor to identify and plot anomalies of potential archaeological origin
- Excavation of sample trial trenches to determine the nature, extent, state of preservation and importance of any archaeological remains within the proposed working width informed by the results of preceding stages of study and survey
- The archaeological field evaluation be carried out by a suitably experienced archaeological contractor, such as a Registered Organisation accredited by the Chartered Institute for Archaeology (see <http://www.archaeologists.net/>) or an organisation that can demonstrate that they have equivalent experience, capability and quality management systems in place. The appointed contractor must have access to appropriate geo-archaeological expertise. All fieldwork should be undertaken in accordance with CIFA's published Standards and Guidance for evaluation, and Historic England professional guidelines (<https://www.historicengland.org.uk/images-books/publications/>) to written specifications that have been agreed with the HER prior to commencement.

3. Assessment of Significance

- Assessment of the significance of those heritage assets and their settings likely to be directly or indirectly impacted by the development; the assessment of the significance of heritage assets will take account of the combined results of all the preceding stages of desk based assessment and archaeological field evaluation, and be based on the heritage values set out in *Conservation Principles, Policies and Guidance for the sustainable management of the historic environment*, Historic England, 2008 <https://www.historicengland.org.uk/images-books/publications/conservation-principles-sustainable-management-historic-environment/>.
- The methodology of assessing the contribution of setting to significance should be undertaken as set out in Historic England's Historic Environment Good Practice Advice Note 3 ('The Setting of Heritage Assets' 2nd Edition, 2017) <https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/>.
- The use of photographic visualisations from appropriate viewpoints along the pipeline corridor would be of particular use to demonstrate indirect effects of the proposals on settings, including evidence of no effects. Impacts other than visual, such as noise, dust and odour, should also be considered. Viewpoints should be agreed with the HER and planning case officers.

4. Assessment of Impact

- Assessment of impacts of the proposed development on the significance of the heritage assets and their settings based on the findings of the preceding stages, with reference to details of proposed construction ground works in relation to archaeological assets, and justification of impacts explaining why the works would be necessary or desirable, including any benefits or heritage enhancements which justify any resulting harm. In the case of substantial harm or loss of significance, the relevant tests in the NPPF should be applied.
- Consideration must also be given for future accessibility to conduct archaeological investigations to ensure the archaeological interest is maintained and available for future generations to investigate.

5. Mitigation

- An explanation of any measures taken to avoid, minimise or mitigate any harm to the significance of the heritage asset/s, including within their settings.
- Where harm is unavoidable, measures to offset the harm to significance should be included; in the case of archeological remains these measures should be set out in a Written Scheme of Investigation (WSI) detailing the scope, methodologies and timelines of an appropriate programme of archaeological work.

Assessing the value of heritage assets and the magnitude of change (see 9.9, Scoping Report) should take place on completion of **ALL** stages of the field evaluation set out above, and the Environmental Statement should include the results of all historic environment and archaeological fieldwork reports.

The Environmental Statement should consider what the impact of the development on the significance of the heritage assets will be together with a statement of justification of why the works would be desirable or necessary, including any benefits which justify any resulting harm. In the case of substantial harm or loss of significance, the tests in the NPPF should be applied.

If the assessment demonstrates that the significance of heritage assets will be adversely affected by the proposals, then appropriate mitigation measures should be drawn up to conserve them. This may include avoiding or minimizing effects to areas of significance, if necessary by modifying the layout and/or design of the proposals ie. In situ preservation.

Alternatively, where harm is unavoidable and loss of heritage assets as a result of development is considered justified, provision should be made to record the evidence before it is lost either in advance of, or during, development.

Mitigation measures should be detailed in the application, including the provision of Written Schemes of Investigation (specification) for further archaeological excavation and recording, as may be necessary.

Where a DCO may subsequently be granted, the implementation of the agreed appropriate mitigation measures can be secured by an appropriately worded Requirement without pre-commencement delay to the construction programme.

Recommendation

A DCO application submitted for this pipeline proposal would need to be accompanied by an adequate Cultural Heritage assessment as set out above to inform the EIA and accord with paragraph 194 of the NPPF, Core Strategy CS6 and saved Local Plan policies HE8 and HE9.

Where the heritage assessment in the EIA is considered to be incomplete or inadequate, the HER will advise the local planning authority for the Local Impact Report.

I would be grateful therefore if you would pass this advice to the applicant or their consultant.

Alison Williams
Historic Environment Officer



APPENDIX 1

Relevant Policy

The information required in the Applicant's Assessment is set out in Sections 5.8.8-10 of the National Policy Statement for Energy (EN-1, 2011) as follows:

5.8.8 As part of the ES (see Section 4.2) the applicant should provide a description of the significance of the heritage assets affected by the proposed development and the contribution of their setting to that significance. The level of detail should be proportionate to the importance of the heritage assets and no more than is sufficient to understand the potential impact of the proposal on the significance of the heritage asset. As a minimum the applicant should have consulted the relevant Historic Environment Record¹²⁰ (or, where the development is in English or Welsh waters, English Heritage or Cadw) and assessed the heritage assets themselves using expertise where necessary according to the proposed development's impact.

5.8.9 Where a development site includes, or the available evidence suggests it has the potential to include, heritage assets with an archaeological interest, the applicant should carry out appropriate desk-based assessment and, where such desk-based research is insufficient to properly assess the interest, a field evaluation. Where proposed development will affect the setting of a heritage asset, representative visualisations may be necessary to explain the impact.

5.8.10 The applicant should ensure that the extent of the impact of the proposed development on the significance of any heritage assets affected can be adequately understood from the application and supporting documents.

The National Planning Policy Framework (NPPF, 2021) provides guidance to local authorities for conserving and enhancing heritage assets and their settings, which includes archaeological sites and remains. Paragraph 8 refers to the role of the planning system to contribute to achieving sustainable development under three overarching objectives; economic, social and environmental. The environmental objective includes contributing to protecting and enhancing the historic environment.

Section 16 (paragraphs 189-208) of the NPPF details the government's approach to conserving and enhancing the historic environment. Paragraph 189 describes heritage assets as '**an irreplaceable resource**' to be '**conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations**'.

Paragraph 194 requires an applicant to submit information that identifies any heritage asset that their proposals may affect, and that assesses the significance of the assets including the contribution of their settings. Consultation of the local HER is the minimum requirement in this process. Paragraph 194 states that '**Where a site on which development is proposed includes, or has the potential to include, heritage assets of archaeological interest, local planning authorities should require developers to submit an appropriate desk based assessment and, where necessary, a field evaluation.**'

This information should be sufficient to understand the potential impact of the proposal on the significance of any affected heritage assets. It should also allow the local planning authority to assess the degree of impact on the heritage assets and their settings, and how this impact may be mitigated, by avoiding or minimising any conflict between conserving the asset and any aspect of the proposal (NPPF 195).

Such assessment allows the planning authority to make an informed and reasonable decision in line with the sustainable development principles of the NPPF, as well as local planning Plan policies HE8 Ancient Monuments and HE9 Archaeological Evaluation.

Core Strategy policy CS6 states that '**The council will seek to protect, conserve and enhance North Lincolnshire's historic environment as well as the character and setting of area of acknowledged importance including historic buildings, conservation areas, listed buildings (both statutory and locally listed), registered parks and gardens, scheduled ancient monuments and archaeological remains....Development proposals should provide archaeological assessments where appropriate.**'

Where Scheduled Monuments, or sites of equivalent significance, are affected directly or indirectly, Local Plan policy HE8 directs '**Development proposals which would result in an adverse effect on**

Scheduled [Ancient] Monuments and other nationally important monuments, or their settings, will not be permitted.'

Policy HE9 Archaeological Evaluation states that **'Where development proposals affect sites of known or suspected archaeological importance, an archaeological assessment to be submitted prior to the determination of a planning application will be required. Planning permission will not be granted without adequate assessment of the nature, extent and significance of the remains present and the degree to which the proposed development is likely to affect them.**

Sites of known archaeological importance will be protected. When development affecting such sites is acceptable in principle, mitigation of damage must be ensured and the preservation of the remains in situ is a preferred solution. When in situ preservation is not justified, the developer will be required to make adequate provision for excavation and recording before and during development.'

Local Plan Policy LC14 will apply which states:

'The Isle of Axholme is designated as an area of Special Historic Landscape Interest.

Within this area, development will not be permitted which would destroy, damage or adversely affect the character, appearance or setting of the historic landscape, or any of its features.

Development required to meet the social and economic needs of rural communities and small scale tourist and outdoor sport and recreational development will be permitted provided such development is related to the historic landscape and its features.

A high standard of design and siting in new development will be required reflecting the traditional character of buildings in the area and the character of the historic landscape, and using materials sympathetic to the locality.

Schemes to improve, restore or manage the historic landscape will be sought in connection with, and commensurate with the scale of, any new development affecting the area of Special Historic Landscape Interest.'

Feekins-Bate, Laura

From: Amy Shepherdson <[REDACTED]>
Sent: 06 May 2022 15:55
To: Humber Low Carbon Pipelines
Subject: NK/2022/0250 - Scoping Opinion for the Humber Low Carbon Pipelines project

Categories: EST

Good afternoon,

We have received a consultation for the scoping opinion for the Humber Low Carbon Pipelines project. The project appear to be 100miles from North Northants boundary an as such we may have been consulted in error. As such we are not proposed to send a formal response.

Kind regards,

Amy Shepherdson | Development Officer

Development Management

North Northamptonshire Council

Kettering Office

Bowling Green Road, Kettering, Northants NN15 7QX

T: 0300 126 3000 | Office: [REDACTED] | Mob: [REDACTED]

Email : [REDACTED]

Twitter: @NNorthantsC

Facebook: @NorthNorthants

Web: www.northnorthants.gov.uk



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The Planning Inspectorate
By Email
humberlowcarbon@planninginspectorate.gov.uk

Our Ref: Michael Reynolds
Your Ref: EN070006

Date: 10 May 2022

Michael Reynolds
Business and Environmental Services
East Block
County Hall
Racecourse Lane
Northallerton
DL7 8AD

Tel: [REDACTED]

Email:
[REDACTED]

Dear Sirs

**Humber Low Carbon Pipeline
Scoping Report**

Thank you for consulting North Yorkshire County Council and Selby District Council on the scoping report for the above project.

Please accept this response on behalf of both North Yorkshire County Council and Selby District Council.

Our responses on the various chapters are as follows:

SDC Development Management

The District Council's Development Management section would defer to the specialist input provided by the relevant sections of the District and County Council on matters of agriculture and soils, air quality, ecology and biodiversity, geology and hydrology, cultural heritage, landscape, noise and vibration, human health and wellbeing, traffic and transport, waste and materials and hydrology and land drainage.

In terms of the assessment of cumulative impacts, the District Council's Development Management section would be of the view that all development types within the agreed study area with the potential to cause likely significant cumulative effects as a result of construction, operation or decommissioning of the proposed development should be included. The District Council's Development Management section would welcome being consulted on the assessment methodology and short list of projects going forward.

CHAPTER 5 AIR QUALITY

Construction Phase

5.8.5 The potential for amenity impacts during the construction phase is scoped in for further assessment, for inclusion within the Preliminary Environmental Information Report (PEIR) and Environment Statement (ES), in the form of a Construction Environmental Management Plan (CEMP) and Decommissioning Environmental Management Plan (DEMP). The intention is to utilise the Institute of Air Quality Management (IAQM) construction dust guidance, which is a suitable approach.

14.4.2 At this stage, the exact locations for construction compounds and construction site access points are not known and I would request justification should they be sited near sensitive receptors.

Operational Phase

5.8.3 Air quality impacts from operational traffic trips are expected to be negligible and therefore scoped out for further assessment. It is noted within Table 5.2 that this will be confirmed upon review of traffic data once available, which should include cumulative impacts from this and Drax Bioenergy with Carbon Capture and Storage Project at Drax Power Station, after which I would concur with the proposals to scope out operational air quality impacts.

CHAPTER 11 NOISE & VIBRATION

Construction Phase

11.7.1 The potential for amenity impacts during the construction phase is scoped in for further assessment, for inclusion within the Preliminary Environmental Information Report (PEIR) and Environment Statement (ES), in the form of a Construction Environmental Management Plan (CEMP) and Decommissioning Environmental Management Plan (DEMP).

11.9.2 The intention is to utilise BS5228-1 and BS5228-2 assessment methodologies, which is a suitable approach, and I would concur that adopting the lowest Annex E category threshold values negates the need for baseline monitoring. I would express caution that even the lowest thresholds will likely significantly exceed existing background sound levels at sensitive receptors within the construction zones due to the predominantly rural context, therefore adopting shorter LAeq,T averaging periods for short-lived high-impact noise activities is critical to protecting residential amenity, as is acknowledged within section 11.9.2 of the report.

11.7.1 I have reservations regarding the approach to monitoring, which is triggered in the event of a complaint being received. This approach is somewhat reactive and relies on the resident being aggrieved by construction impacts to the point that they feel it necessary to escalate with the relevant authorities. I would recommend adopting a monitoring strategy that proactively enables identification of any exceedances of agreed criteria so that the relevant action can be taken to avoid complaints in the first place. It is noted that the monitoring strategy will be agreed in advance.

14.4.2 At this stage, the exact locations for construction compounds and construction site access points are not known and I would request justification should they be sited near sensitive receptors, and where this is necessary, that the principles of the Noise Policy Statement for England (NPSE) are applied in so far as the applicant should minimise adverse amenity impacts to the point of reasonable practicability.

2.8.2 I am unable to locate the proposals for construction working hours with full details to follow within the ES. In the absence of justification to the contrary, I would

recommend that construction working hours are restricted to the typical 8am-6pm Mon-Fri, 8am-1pm Sat and not at all on Sundays and Bank Holidays where there is potential for amenity impacts at nearby sensitive receptors.

11.9.3 It is reported that the significance criteria for the construction and decommissioning phase vibration levels will be derived from Annex B of BS 5228-2. Unlike noise thresholds, these criteria simply identify human response to vibration at different levels, for example at what point the Peak Particle Velocity (PPV) becomes perceptible (0.14-0.3mms⁻¹), when complaints might occur (1.0mms⁻¹) and when it becomes intolerable (10mms⁻¹). I would recommend that vibration criteria and monitoring is well defined within the CEMP/DEMP.

Operational Phase

11.8.3 For the most part, the potential for amenity impacts during the operational phase is scoped out for further assessment, the exception being noise associated with the Pumping Facility which I understand will be located outside of the Selby district. Overall, I would concur with the justification set out within Table 11.2 to scope out other operational noise for further assessment.

Land Contamination

Having considered chapter 8 of the assessment. Land contamination has been scoped in for further assessment and I'd agree that this is appropriate.

Cultural Heritage

Glossary – Non-designated Heritage Asset – According to Government Guidance 'Non-designated heritage assets' have to be specifically identified by a plan making body, for example in a local or neighbourhood plan document or a local list. Please see [Historic environment - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/historic-environment) and in particular paragraphs 039-041. The inclusion of a heritage asset on a Historic Environment Record does qualify it as a non-designated heritage asset.

p. 226 – Table 9.3. Use of term Non-designated heritage assets needs to be revised to 'heritage assets'.

Chapter 9 – Cultural Heritage - This chapter sets out a methodology for examining existing resources to establish the baseline conditions. In most cases the examination of existing resources will be insufficient to properly characterise the full significance of the archaeological interest of an area and further field evaluation is normally necessary (NPPF para. 194). The latest version of the HLCP Cultural Heritage Methodology Document (March 2022) included paragraphs 3.10.6 and 3.10.7 that detailed that the requirement for further fieldwork would be discussed with consultees and the results of such work would be available during the examination period. Although this is briefly mentioned in the scoping assessment (in the final bullet point of 9.6) I am concerned that more attention has not been given to the level of survey that might be required and if it is deliverable. At this stage I would have expected to see a draft methodology of the types of technique that could be applied as a minimum and in particular the commissioning of geophysical survey works prior to the establishment of crops that might delay this until harvest in late summer/early autumn.

9.7 - This section sets out the approach to mitigation. Again I would stress that this cannot really be addressed until the significance of heritage assets is properly established, including establishing levels of archaeological potential through field evaluation where necessary.

9.10.1 – The first bullet point again assumes that examination of the current baseline will 'present a robust basis for assessment'. Again, I would stress that there are gaps in our knowledge and that

new field evaluation, particularly geophysical survey, will be critical to our assessment of the impact of the project on heritage assets of archaeological interest.

Landscape and Visual Assessment

These comments principally relate to Chapter 10 Landscape in the Applicant's EIA Scoping Report, but comments overlap with other topic areas such as Cultural Heritage, Agriculture and Soils, Ecology and Biodiversity, Noise and Vibration, Human Health and Wellbeing.

These comments are based on the current published details within the NYCC area.

In relation to Landscape and Visual effects, I am generally supportive of the proposed ES methodology set out in chapter 10 but I also have the following comments:

LVIA Methodology – I would support the proposed methodology, that the LVIA should follow guidance as set out in GLVIA Third Edition (LI and IEMA, 2013), Landscape Institute (2013) GLVIA3 Statement of Clarification 1/13, and Landscape Institute Technical Guidance Note 06/119: Visual Representation of Development Proposals.

Study Area – For the LVIA I would generally support the parameters and cope of the study area as listed in chapter 10.4, however the parameters and scope of the study area for cumulative effects are still to be agreed.

Cumulative Landscape and Visual Effects – the Applicant should explain how cumulative landscape and visual effects will be assessed within the EIA. There are a number of current planning applications in the local area around Drax Power Station and in context of Drax village and Camblesforth village (including NSIPs, other major applications, screening and scoping applications). Many of these are associated with Drax Power Station or linked to energy production and energy storage.

Within chapter 3.8 the Applicant has set out how schemes will be identified and filtered to be carried forward into the inter-project cumulative assessment and listing several major scheme types. However, all development types within the agreed study area with the potential to cause significant adverse effects should be considered, particularly where there is a concentration of proposed development around Drax Power Station.

Detailed Study of Existing Landscape Components - The Applicant should undertake a topographical survey in sufficient detail to understand and explain the all the key features and characteristics of the existing site including levels and landform, buildings and structures, existing vegetation and screening, hard / soft surfaces.

Construction Compounds and Site Access Routes – temporary construction compounds and access to construction working areas should be defined where possible within the ES Proposed Scheme, particularly where this is likely to cause significant adverse landscape and visual effects and / or loss of existing vegetation.

Existing Trees and Vegetation – this should be reviewed, protected and retained where appropriate. Tree survey and arboricultural impact assessment should be to BS5837:2012. This is important to minimise adverse landscape effects and if vegetation is needed for ongoing screening of the site.

Soil Management / Agricultural Land – a soil survey, assessment and management plan are needed in order to protect and manage site soils (AGIs and pipeline route, construction and operational areas), including protection and restoration of ALC best and most versatile land where appropriate. The proposed methodology in Chapter 4.9 seems to focus on ALC assessment only of the AGI locations. The Applicant should define a method of establishing ALC / quality along the line of the pipeline, as a benchmark for quality of reinstatement to be carried forward to the CEMP.

Assessment Viewpoints, Mapping and ZTV – The principle of establishing a ZTV using a DTM is acceptable but this should be verified through fieldwork to establish an accurate visual envelope.

The principle of using representative viewpoints to illustrate the experience of different types of visual receptor is acceptable, however the assessment should aim describe and assess the full effects of the development (not limited to a summary of viewpoints). The assessment should provide mapping of the landscape and visual effects to help quantify and illustrate the geographical extent of all receptors and likely effects of the development.

The Applicant has discussed a number of potential viewpoints with the joint local authorities (December 2021 and February 2022) and in order to help facilitate photography during the winter season (not included or illustrated within the EIA Scoping Report). However, this should be reviewed once final details of scheme design and routing become available, adjusted and updated as necessary.

Photographs and Photomontages - I would welcome the proposed method and approach to photographs and photomontages, in-line with Technical Guidance Note (TGN) 06/19 Visual Representation of Development Proposals (Landscape Institute, 2019).

I would agree that for annotated photo-panoramas TGN 06/19 Type 1 of the Project are most appropriate. Where possible these should relate to the final pipeline route, not the general Scoping Route Corridor. For AGIs I would suggest at least Type 3 wirelines / photomontages should be considered where sensitivity of context, scale and proximity of the development warrant it. I would wish to see a realistic impression of scale and detail.

I would wish to see photomontages explain how adverse effects will be mitigated over time. Photographs should include winter views where possible to explain the worst-case scenario.

Appendix 3 and 4 in TGN 06/19 should be noted, with camera / tripod height / position in the field adjusted as necessary so that views show the full extent of the site / development and show the effect it has upon the receptor location. Views of the site should not be unnecessarily obscured by buildings, roadside hedgerows or other vegetation.

I would welcome the opportunity to discuss viewpoints and photomontages further once the pipeline routing and final Proposed Scheme details have been produced.

Site Design, Landscape Proposals, Mitigation, Maintenance and Aftercare – I would like to see a landscape strategy for proposed scheme, which helps minimise adverse effects and demonstrated good design. The landscape strategy should consider the wider site and future maintenance responsibilities. The proposed scheme should avoid removing or double-counting landscape mitigation previously committed as part of other planning approvals and NSIPs.

Consideration should be given to limitations of future maintenance access and easements along the line of the pipeline, particularly where this might affect retention and replacement of vegetation.

I would like to see consideration of both Landscape and Biodiversity objectives for the site as a clear joined-up approach.

Landscape proposals and mitigation should be proportionate to the scale of the development and should have regard for and contribute to the wider landscape character and setting, local amenity with clear aims and objectives.

Landscape proposals should support the Government's commitment to improving green infrastructure, health and wellbeing, as set out in the 25 Year Environment Plan. The Leeds City Region Green and Blue Infrastructure Strategy, NPPF and other local policy, also recognise GI.

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

Ecology

Thank you for your consultation on the above scoping document. It should be noted that comments provided below are limited to the section of the scheme that falls within the North Yorkshire County Council (and Selby District Council) administrative boundary, which is Drax Power Station to the boundary at the River Aire.

The overall approach to the EIA for biodiversity is supported, including the features scoped in (and out) of the EIA process and the intention to follow the CIEEM guidelines for Ecological Impact Assessment (EclA). I am supportive of the survey methodology set out within the Conservation Strategy (Volume III, Appendix A).

I am pleased that at this early stage the development is considering opportunities for ecological enhancement and biodiversity net gain. I would encourage use of the most up to date version of the Defra Biodiversity Metric in presenting data on biodiversity losses and gains.

Minerals and Waste

The only comment from Planning Services is that the recently adopted Minerals and Waste Joint Plan has not been taken into account, and it should be as the scheme covers a small area of Selby where mineral safeguarding is in place.

Highways

Comments to follow.

LLFA

Comments to follow.

Should you have any further queries please don't hesitate to contact Michael Reynolds on the above details or contact the author of the section directly should you have their details.

Yours faithfully

Michael Reynolds
Senior Policy Officer (Infrastructure)

Feekins-Bate, Laura

From: Before You Dig <BeforeYouDig@northerngas.co.uk>
Sent: 19 April 2022 13:03
To: Humber Low Carbon Pipelines; Before You Dig
Subject: RE: EXT:EN070006 - Humber Low Carbon Pipeline - EIA Scoping Notification and Consultation

Good afternoon,

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

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

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

If you give specific site locations, we would be happy to provide gas maps of the area which include the locations of our assets.

(In terms of High Pressure gas pipelines, the routes of our MAHP's have already been lodged with members of the local Council's Planning Department)

Kind regards,

Jennie Adams

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

Before You Dig: 
www.northerngasnetworks.co.uk
facebook.com/northerngasnetworks
twitter.com/ngngas
Alternative contact:
beforeyoudig@northerngas.co.uk



Get involved! Have your say in the future of your gas network and win great prizes, by taking part in our BIG customer survey at together.northerngasnetworks.co.uk Keep posted to take part in a range of activities from workshops to roadshows. Together, we are the network.

Northern Gas Networks Limited (05167070) | Northern Gas Networks Operations Limited (03528783) | Northern Gas Networks Holdings Limited (05213525) | Northern Gas Networks Pensions Trustee Limited (05424249) | Northern Gas Networks Finance Plc (05575923). **Registered address:** 1100 Century Way, Thorpe Park Business Park, Colton, Leeds LS15 8TU. Northern Gas Networks Pension Funding Limited Partnership (SL032251). **Registered address:** 1st Floor Citypoint, 65 Haymarket Terrace, Edinburgh, Scotland, EH12 5HD. **For information on how we use your details please read our [Personal Data Privacy Notice](#)**

From: Humber Low Carbon Pipelines <HumberLowCarbon@planninginspectorate.gov.uk>
Sent: 12 April 2022 11:05
Cc: Humber Low Carbon Pipelines <HumberLowCarbon@planninginspectorate.gov.uk>
Subject: EXT:EN070006 - Humber Low Carbon Pipeline - EIA Scoping Notification and Consultation

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Dear Sir/ Madam

Please see attached correspondence on the proposed Humber Low Carbon Pipeline project.

Please note that the deadline for consultation responses is **Tuesday 10 May 2022**, and is a statutory requirement that cannot be extended.

Kind regards
Laura



The Planning
Inspectorate

Laura Feekins-Bate | EIA Advisor
The Planning Inspectorate



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DPC:76616c646f72





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

THE PLANNING INSPECTORATE
Environmental Services
Central Operations
Temple Quay House
2 The Square
Bristol, BS1 6PN

Email: planning_admin@redcar-cleveland.gov.uk
www.redcar-cleveland.gov.uk/Planning
Direct line [REDACTED]

Our Ref: R/2022/0352/LAC
Your Ref:
Contact: Mr D Pedlow
Date: 25 April 2022

Dear Sir/Madam

PROPOSAL: **PLANNING ACT 2008 (AS AMENDED) AND THE INFRASTRUCTURE PLANNING (EIA) REGULATIONS 2017 (THE EIA REGULATIONS) REGULATIONS 10 AND 11: APPLICATION BY THE NATIONAL GRID CARBON LIMITED (THE APPLICANT) FOR AN ORDER GRANTING DEVELOPMENT CONSENT FOR THE HUMBER LOW CARBON PIPELINE PROJECT (PROPOSED DEVELOPMENT) SCOPING CONSULTATION AND NOTIFICATION OF THE APPLICANTS CONTACT DETAILS AND DUTY TO MAKE AVAILABLE INFORMATION TO THE APPLICANT IF REQUESTED - PINS REFERENCE NO. EN070006**

LOCATION: **HUMBER LOW CARBON PIPELINE PROJECT**

APPLICANT: **THE PLANNING INSPECTORATE**

Thank you for your consultation received on **12 April 2022**.

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

Yours faithfully

Mr D Pedlow
Principal Planning Officer



Proposed DCO Application by National Grid Carbon for Humber Low Carbon Pipelines

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 is a major road user nationally. Disruption to the highway network and traffic delays can have direct consequences on Royal Mail's operations, its ability to meet the Universal Service Obligation and comply with the regulatory regime for postal services thereby presenting a significant risk to Royal Mail's business.

Royal Mail and its advisor BNP Paribas Real Estate have reviewed the ES Scoping report for Humber Low Carbon Pipelines dated April 2022.

The proposed Humber Low Carbon Pipelines have potential to affect Royal Mail operational interests through construction phase impacts on the highway network. However, due to insufficient information presently being available by which to assess the level of potential risk to its operations and any proposed mitigations for such risk, at this point in time Royal Mail is not able to provide a consultation response. Therefore, Royal Mail wishes to reserve its position to submit a consultation response/s later in the DCO consenting process when sufficient information is available. Royal Mail also wishes to reserve its position to submit representations to the 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:

Holly Trotman [REDACTED], **Senior Planning Lawyer, Royal Mail Group Limited**

Daniel Parry Jones (d [REDACTED]), **Director, BNP Paribas Real Estate**

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

End

Feekins-Bate, Laura

From: Matthew Foster <[REDACTED]>
Sent: 13 April 2022 14:20
To: Humber Low Carbon Pipelines
Cc: sccl.admin@tritonpower.co.uk
Subject: RE: EN070006 - Humber Low Carbon Pipeline - EIA Scoping Notification and Consultation

Ref. EN070006 dated 12 April 2022.

Dear Emma,

I confirm on behalf of Triton Power (Saltend Cogeneration Company Ltd), operators of the Saltend Power Station, that we have no comments on the Scoping consultation.

We are supportive of the low carbon infrastructure being proposed for the Humber.

Best regards,

Matt



Matthew Foster
Business Development Manager

Saltend Cogeneration Company Ltd
Saltend Power Station
Saltend, Hedon Road, Hull. HU12 8GA - UK
Tel. +44 [REDACTED] Mob. +44 [REDACTED]

www.tritonpower.co.uk

Registered Office: Saltend, Hedon Road, Hull, East Yorkshire, HU12 8GA.
Registered in England & Wales. Registered No: 03274929

From: Humber Low Carbon Pipelines [<mailto:HumberLowCarbon@planninginspectorate.gov.uk>]
Sent: 12 April 2022 11:47
To: _MB-TP Get In Touch <getintouch@tritonpower.co.uk>
Cc: Humber Low Carbon Pipelines <HumberLowCarbon@planninginspectorate.gov.uk>
Subject: EN070006 - Humber Low Carbon Pipeline - EIA Scoping Notification and Consultation

EXTERNAL MAIL

FAO OF Saltend Cogeneration Company Limited (Saltend Power Station)

Dear Sir/ Madam

Please see attached correspondence on the proposed Humber Low Carbon Pipeline project.

Please note that the deadline for consultation responses is **Tuesday 10 May 2022**, and is a statutory requirement that cannot be extended.

Kind regards

Laura



Laura Feekins-Bate | EIA Advisor
The Planning Inspectorate

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Feekins-Bate, Laura

From: [REDACTED]
Sent: 10 May 2022 19:20
To: Humber Low Carbon Pipelines
Cc: [REDACTED]
Subject: Re: EN070006 - Humber Low Carbon Pipeline - EIA Scoping Notification and Consultation

Dear Sir / Madam

We wish to inform you that Somerby Parish Meeting has No Comments to make in response to the Planning Inspectorate's consultation on the applicant's Scoping Report, having consulted Somerby residents on the Pipeline proposal.

Kind regards

Neil Laminman
Secretary to Somerby Parish Meeting

-----Original Message-----

From: Humber Low Carbon Pipelines <HumberLowCarbon@planninginspectorate.gov.uk>
To: [REDACTED]
CC: Humber Low Carbon Pipelines <HumberLowCarbon@planninginspectorate.gov.uk>
Sent: Tue, 12 Apr 2022 11:25
Subject: EN070006 - Humber Low Carbon Pipeline - EIA Scoping Notification and Consultation

FAO OF CLERK TO SOMERBY PARISH COUNCIL

Dear Sir/ Madam

Please see attached correspondence on the proposed Humber Low Carbon Pipeline project.

Please note that the deadline for consultation responses is **Tuesday 10 May 2022**, and is a statutory requirement that cannot be extended.

Kind regards
Laura



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Inspectorate

Laura Feekins-Bate | EIA Advisor
The Planning Inspectorate



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Feekins-Bate, Laura

From: South Holderness IDB <[REDACTED]>
Sent: 20 April 2022 13:08
To: Humber Low Carbon Pipelines
Subject: RE: EN070006 - Humber Low Carbon Pipeline - EIA Scoping Notification and Consultation

Good Afternoon

Further to your e-mail of the 12th April 2022 – We can confirm that we are a consultation body that should be considered in the environmental statement.

Please Note: This is for the Holderness area of the East Riding of Yorkshire – we have no interest in the project that is South and West of the Humber.

We have no comments at this stage.

Our title is:
South Holderness Internal Drainage Board

[REDACTED]

Clerk to the Board – Mr Ralph Ward
Telephone – [REDACTED]
E-Mail – [REDACTED]

Regards

[REDACTED]

R E Ward
Clerk to the Board
South Holderness IDB

[REDACTED]

18 Market Place, Patrington, HU12 0RB

From: Humber Low Carbon Pipelines
Sent: 12 April 2022 11:05
Cc: Humber Low Carbon Pipelines <HumberLowCarbon@planninginspectorate.gov.uk>
Subject: EN070006 - Humber Low Carbon Pipeline - EIA Scoping Notification and Consultation

Dear Sir/ Madam

Please see attached correspondence on the proposed Humber Low Carbon Pipeline project.

Please note that the deadline for consultation responses is **Tuesday 10 May 2022**, and is a statutory requirement that cannot be extended.

Kind regards
Laura



Laura Feekins-Bate | EIA Advisor
The Planning Inspectorate

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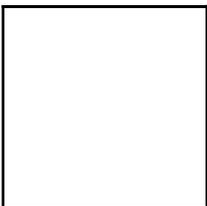
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Feekins-Bate, Laura

From: Elaine Atkinson <[REDACTED]>
Sent: 13 April 2022 11:15
To: Humber Low Carbon Pipelines
Subject: N070006 - Humber Low Carbon Pipeline - EIA Scoping Notification and Consultation

This document was classified as: OFFICIAL

This document was classified as: OFFICIAL

Thank you for the recent consultation

I can confirm that Stockton Borough Council has no comments to make.

Elaine Atkinson

Principal Planning Officer
Stockton-on-Tees Borough Council

Telephone: [REDACTED] | Email: [REDACTED] | Web: www.stockton.gov.uk



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**

Yorkshire and North East Area

Foss House, King's Pool
1-2 Peasholme Green
York
YO1 7PX

Tel [REDACTED]

yne@forestrycommission.gov.uk

Area Director
Crispin Thorn

10th May 2022

By email only

Dear Laura Feekins-Bate,

EN070006 - Humber Low Carbon Pipeline - EIA Scoping Notification and Consultation

Thank you for seeking the Forestry Commission's advice about the impacts that this application may have on woodland. The Forestry Commission is a statutory consultee for:

- nationally significant infrastructure projects that could affect forests and woodlands

The Forestry Commission is also a non-statutory consultee on development affecting or within 500m of ancient woodland.

One of the most important features of ancient woodlands is the quality and inherent biodiversity of the soil; they are relatively undisturbed physically or chemically. This applies both to Ancient Semi Natural Woodland (ASNW) and Plantations on Ancient Woodland Sites (PAWS). Direct impacts of development that could result in the loss or deterioration of ancient woodland or ancient and veteran trees include:

- damaging or destroying all or part of them (including their soils, ground flora or fungi)

- damaging roots and understory (all the vegetation under the taller trees)
- damaging or compacting soil around the tree roots
- potentially polluting the ground and watercourses around them
- changing the water table or drainage of woodland or individual trees
- damaging archaeological features or heritage assets

It is therefore essential that the ancient woodland identified is considered appropriately to avoid the above impacts.

The Forestry Commission has prepared joint standing advice with Natural England on ancient woodland and veteran trees which we refer you to as it notes that ancient woodland is an **irreplaceable habitat**, and that, in planning decisions, Plantations on Ancient Woodland Sites (PAWS) should be treated equally in terms of the protection afforded to ancient woodland. It highlights the Ancient Woodland Inventory to find out if woodland is ancient. For more information please see:

<https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences>

We also particularly refer you to further technical information set out in Natural England and Forestry Commission's [Standing Advice on Ancient Woodland](#) – plus supporting [Assessment Guide and Case Decisions](#).

We note Figure 6.3 of Volume 11, part 2 of the EIA Scoping Report which shows the priority habitats along the proposed route of the Humber Low Carbon Pipeline. The proposed route will potentially affect directly and indirectly a range of woodland sites and a mix of woodland types. From looking at the Forestry Commission mapping system some of these woodland sites have existing Forestry Commission approved Management Plans, Conditional Felling Licenses and a range of agreements on them with a potential cluster of sites in the Scawby – Manby Wood area south east of Scunthorpe. If you would like individual feedback on sites with Forestry Commission Incentives and Regulatory agreements throughout the entire proposed route please feel free to contact the Forestry Commission.

It is worth noting that woodland cover is very low in the location of the proposed scoping route corridor and study route of the pipeline (North East Lincolnshire 3%, East Riding of Yorkshire 4% woodland cover based upon the National Forestry Inventory 2018) compared to the rest of the country. Therefore we would be keen that the following is recognised in future stages of the proposed development of the scheme:

“recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and

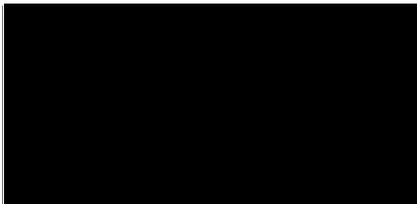
other benefits of the best and most versatile agricultural land, and of trees and woodland”: para 174 b) National Planning Policy Framework .

It is worth also noting the proposed route sits within Northern Forest and associated halo area this partnership sets out to increase woodland cover in this area which is mentioned in the DEFRA: [England Trees Action Plan 2021 to 2024 - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/671222/England_Trees_Action_Plan_2021_to_2024.pdf) and the DEFRA 25 Year Environment Plan .

In relation to future resilience of existing and new woodland along the proposed route we would encourage the developer to think about how any proposed woodland mitigation measures can be resilient to the impact of climate change the following is a useful guide : Managing England’s Woodlands in a climate emergency.

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.

Yours faithfully,



Jim Smith
Forestry Commission
Yorkshire & North East Area Local Partnership Adviser

Feekins-Bate, Laura

From: Stephen Vanstone <[REDACTED]>
Sent: 10 May 2022 06:51
To: Humber Low Carbon Pipelines
Cc: Trevor Harris
Subject: RE: EN070006 - Humber Low Carbon Pipeline - EIA Scoping Notification and Consultation
Attachments: HLCP - Statutory consultation letter.pdf

Good morning Laura,

I can confirm that Trinity House has no comments to make in this regard.

Kind regards,

Stephen Vanstone

Navigation Services Officer | Navigation Directorate | Trinity House

[REDACTED] | [REDACTED]
www.trinityhouse.co.uk



TRINITY HOUSE

From: Humber Low Carbon Pipelines <HumberLowCarbon@planninginspectorate.gov.uk>
Sent: 12 April 2022 11:37
To: Navigation <navigation@trinityhouse.co.uk>
Cc: Thomas Arculus <[REDACTED]>; Humber Low Carbon Pipelines <HumberLowCarbon@planninginspectorate.gov.uk>
Subject: EN070006 - Humber Low Carbon Pipeline - EIA Scoping Notification and Consultation

Dear Sir/ Madam

Please see attached correspondence on the proposed Humber Low Carbon Pipeline project.

Please note that the deadline for consultation responses is **Tuesday 10 May 2022**, and is a statutory requirement that cannot be extended.

Kind regards
Laura



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Laura Feekins-Bate | EIA Advisor
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Feekins-Bate, Laura

From: adair1 <[REDACTED]>
Sent: 03 May 2022 14:08
To: Humber Low Carbon Pipelines
Subject: Re: EN070006 - Humber Low Carbon Pipeline - EIA Scoping Notification and Consultation

Consultation - Ulceby Parish Council.

Thank you for allowing Ulceby Parish Council to comment on the Humber Low Carbon Pipelines. The parish council offers the following comments:

1. The parish of Ulceby seems to be bearing the brunt of this pipeline. Why is the pipeline 'crammed' into this very small eastern area around the village of Ulceby - could it not be moved to follow a straighter, more sensible line incorporating land to the South West of Ulceby Village.
2. The parish council is very concerned about the volume of construction and workers vehicles travelling through the village. A village already saddled with high a high volume of HGV traffic travelling to and from the ports - we are concerned about traffic generation and highway safety. The parish council would like sight of a robust traffic management plan which ensures the village of Ulceby is protected from all the construction traffic and contractors traffic generated by this pipeline.

I look forward to your comments and reassurances.

Karen Pickering - clerk to Ulceby PC

----- Original Message -----

From: "Humber Low Carbon Pipelines" <HumberLowCarbon@planninginspectorate.gov.uk>
To: [REDACTED] <[REDACTED]>
Cc: "Humber Low Carbon Pipelines" <HumberLowCarbon@planninginspectorate.gov.uk>
Sent: Tuesday, 12 Apr, 2022 At 11:21
Subject: EN070006 - Humber Low Carbon Pipeline - EIA Scoping Notification and Consultation

FAO OF CLERKS TO SCAWBY, WOOTTON AND ULCEBY PARISH COUNCILS

Dear Sir/ Madam

Please see attached correspondence on the proposed Humber Low Carbon Pipeline project.

Please note that the deadline for consultation responses is **Tuesday 10 May 2022**, and is a statutory requirement that cannot be extended.

Kind regards

Laura

Laura Feekins-Bate | EIA Advisor

The Planning Inspectorate

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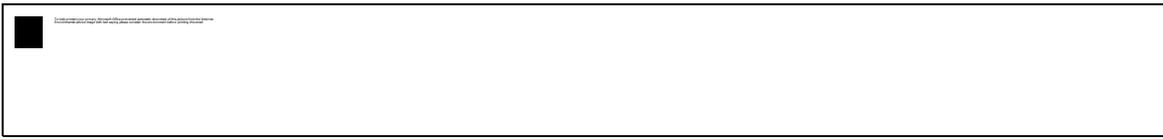
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UK Health
Security
Agency

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

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

Your Ref: EN070006
Our Ref: 59209

Ms Emma Cottam
Senior EIA Advisor
The Planning Inspectorate
Environmental Services Central Operations
Temple Quay House
2 The Square
Bristol BS1 6PN

10th May 2022

Dear Ms Cottam

**Nationally Significant Infrastructure Project
Humber Low Carbon Pipeline Project (National Grid Limited)
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 wish to make the following specific comments and recommendations:

Environmental Public Health

We recognise the promoter's proposal to include a Human Health and Wellbeing section. 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 Environmental Statement (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.

We have the following specific Environmental Public Health recommendations to highlight:

Air Quality

The proposed scope of the Environmental Impact Assessment (EIA) do not appear to contain sufficient detail on the impact of air pollution during construction, in particular on potential public health receptors in Air Quality Management Areas, from potential increased emissions including from the use of non-road mobile machinery.

Recommendation

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 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.

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>

Private Water Supplies

The proposed scope of the Environmental Impact Assessment does not appear to scope the potential human health impacts, hazards and public health receptors surrounding private drinking water supplies during construction phase.

Recommendation

We request the promoter considers the identification of private water supplies and contamination or disruption during construction in the scoping route corridor within the human health chapter in the ES.

Electromagnetic Fields (EMF)

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

Recommendation

We request that the ES clarifies this and if necessary, the promoter should confirm either that the proposed development does not impact any receptors from potential sources of EMF; or ensure that an adequate assessment of the possible impacts is undertaken and included in the ES.

Human Health and Wellbeing – Office for Health Improvement and Disparities (OHID)

This section identifies the wider determinants of health and wellbeing we expect the ES to address, to demonstrate whether they are likely to give rise to significant effects. OHID has focused its approach on scoping determinants of health and wellbeing under four themes, which have been derived from an analysis of the wider determinants of health mentioned in the National Policy Statements. The four themes are:

- Access
- Traffic and Transport
- Socioeconomic
- Land Use

Having considered the submitted Scoping Report OHID wish to make the following specific comments and recommendations:

Effects on mental health - Transportation of hydrogen gas in the pipeline network (Risk perception / understanding of risk).

The scoping report does not make reference to the potential for local public concern through understanding of risk / risk perception. It should be noted that HyNet North West Hydrogen Pipeline Project has this potential impact scoped-in under 'Concern over hydrogen safety'. The effects related to people and communities in the near vicinity of the Project will be identified and addressed through targeted communications and mitigation programmes (e.g. with landowners). For the wider public, general communication programmes in relation to the

Project will provide a source of clear and objective information to increase knowledge and awareness. The Project will work with health professionals as required on a case-by-case basis and this approach has been accepted by PINS in the SoS Scoping Opinion. The broad definition of health proposed by the World Health Organization (WHO), includes reference to mental health. Mental well-being is fundamental to achieving a healthy, resilient and thriving population. It underpins healthy lifestyles, physical health, educational attainment, employment and productivity, relationships, community safety and cohesion and quality of life. A scheme of this scale and nature has impacts on the over-arching protective factors, which are:

- Enhancing control
- Increasing resilience and community assets
- Facilitating participation and promoting inclusion.

Recommendation

The ES should consider potential effects on mental health through risk perception / understanding of risk posed by the transportation of hydrogen.

When estimating community anxiety and stress in particular, a qualitative assessment may be most appropriate. Robust and meaningful consultation with the local community will be an important mitigation measure, in addition to informing the assessment and subsequent mitigation measures. This may involve conducting resident surveys but also information received through public consultations, including community engagement exercises. The Mental Well-being Impact Assessment Toolkit (MWIA) contains key principles that should be demonstrated in a project's community engagement and impact assessment. We would also encourage you to consult with the local authority's public health team who are likely to have Health Intelligence specialists who will have knowledge about the availability of local data. The Mental Well-being Impact Assessment Toolkit (MWIA)², could be used as a methodology. The assessment should identify vulnerable populations and provide clear mitigation strategies that are adequately linked to any local services or assets. Baseline indicators the assessment would benefit from including social cohesion/connectedness, satisfaction with local area and quality of life indicators owing to their established links to mental health and wellbeing.

In terms of sources, we would draw your attention to the following:

- [PHE Fingertips – Mental Health and Wellbeing JSNA](#)
 - Area profiles with various indicators on common mental disorders (including anxiety) and severe mental illness which can be benchmarked with other local areas as well as regional and national data

² [Mental Wellbeing Impact Assessment Toolkit](#), (National MWIA Collaborative (England), 2011) - A toolkit with an evidence-based framework for improving well-being through projects.

- [Office for National Statistics - Wellbeing Indicators](#)
 - Range of datasets related to wellbeing available including young people's wellbeing measures, personal wellbeing estimates and loneliness rates by local authority

Vulnerable populations/ sensitive receptors

An initial approach to the identification of sensitive receptors has been provided, through the health baseline. The impacts on health and wellbeing and health inequalities of the scheme may have particular effect on vulnerable or sensitive populations, including those that fall within the list of protected characteristics.

Para16.4.5 notes the intention to meet with local public health teams, which is welcomed. These teams can assist in identifying local health baseline and local vulnerable populations.

Recommendation

The impacts on health and wellbeing of the scheme will have particular effect on vulnerable or disadvantaged populations, including those that fall within the list of protected characteristics. The report does not comprehensively identify a potential list of vulnerable populations, some of which are also within the protected characteristics. The list of vulnerable populations should be reviewed and include data on the Indices of Multiple Deprivation. Guidance is available from the IAIA³.

Physical activity and active travel / access to open space

The report identifies significant potential impact through the temporary loss or change in formal Public Rights of Way (PRoW) and the existing road network. Physical activity forms an important part in helping to promote healthy weight environments and as such it is important that any changes have a positive long-term impact where possible.

The report does not confirm if a Walking, Cycling and Horse Riding (WCH) Assessment is to be completed and reported. The determination of sensitivity and magnitude must include reference to the usage of each PRoW, bridleway, cycle route or presence of non-motorised users on the highway. In addition to public authority consultation this can also be gained through community consultation and also physical assessment of the routes to determine likely usage levels.

The scoping report makes no reference to the production of a PRoW Management Plan to form part of the DCO obligations

³ Cave, B., Claßen, T., Fischer-Bonde, B., Humboldt-Dachroeden, S., Martín-Olmedo, P., Mekel, O., Pyper, R., Silva, F., Vilianni, F., Xiao, Y. 2020. Human health: Ensuring a high level of protection. A reference paper on addressing Human Health in Environmental Impact Assessment. As per EU Directive 2011/92/EU amended by 2014/52/EU. International Association for Impact Assessment and European Public Health Association

Recommendations

Local consultation with the community and an assessment of the routes directly affected should indicate likely usage levels. Additionally, the assessment of directly affected routes should include extent of vulnerable populations usage, sensitive locations and the present or absence of walking and cycling infrastructure. This data should be used to review the existing allocation of sensitivity, magnitude and final assessment of significance to each of the affected PRow, bridleways and non-motorised use of the public highways.

The ES should include details of the PRow management plan that identifies specific mitigation and enhancements proposed during the construction and operational phase of the scheme.

Socio-economics - Housing affordability and availability

The report (Para 12.8.1) recognised the potential for significant numbers of non-home-based construction workers, depending on the skills mix requirements and local contracting. It also recognises a requirement for temporary living accommodation within reasonable commuting distance of the project such as rented housing, hotels, guest houses, bed and breakfast establishments/lodgings and official caravan parks.

Significant number of non-home-based construction workers could foreseeably have an impact on the local availability of affordable housing. Those residents looking for low cost affordable homes will have the least capacity to respond to change (for example, where there may be an overlap between construction workers seeking accommodation in the private rented sector, and people in receipt of housing benefit seeking the same lower-cost accommodation).

The scoping report confirms the likely peak number of construction workers will be estimated but does not confirm the intention to assess effects on the local private rented sector or tourist accommodation. Additionally, the cumulative effect from other large developments nearby have not been considered.

It should be noted the Housing Needs Assessment for North Lincolnshire (2019)⁴ identifies housing benefit claimants are slightly more likely to access housing through the private rented sector, compared to the regional and national averages. Evidently therefore, the private rented sector plays an important role in meeting affordable housing need in North Lincolnshire.

Recommendation

The peak numbers of construction workers and non-home-based workers should be established and a proportionate assessment undertaken on the impacts for housing availability and affordability and impacts on any local services.

⁴ [Housing Needs Assessment North Lincolnshire September 2019](#)

Any cumulative effect assessment should consider the impact on demand for housing by construction workers and the likely numbers of non-home-based workers required across all schemes.

The assessment should also include potential impacts on tourist accommodation within the socio-economic assessment.

Yours sincerely

On behalf of UK Health Security Agency
nsipconsultations@phe.gov.uk

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

Feekins-Bate, Laura

From: Ford, Neville <[REDACTED]>
Sent: 13 April 2022 16:43
To: Humber Low Carbon Pipelines
Cc: Pollard, Ian; Long, James; Mason, Rob
Subject: FW: EN070006 - Humber Low Carbon Pipeline - EIA Scoping Notification and Consultation

Laura

Thank you for your consultation letter dated 12 April, regarding the above.

The Humber Low Carbon Pipeline subject to the EIA Scoping Notification and Consultation does not impact on Wakefield District.

The Council has no comments to make on this matter.

Thank you.

Neville

Neville Ford
Service Manager Planning and Transportation
Wakefield Council

Email: [REDACTED]
Tel: [REDACTED]
Mobile Tel: [REDACTED]
www.wakefield.gov.uk

Contact Centre (24 Hours) 03458 506 506

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From: Humber Low Carbon Pipelines <HumberLowCarbon@planninginspectorate.gov.uk>
Sent: 12 April 2022 11:16
Cc: Humber Low Carbon Pipelines <HumberLowCarbon@planninginspectorate.gov.uk>
Subject: EN070006 - Humber Low Carbon Pipeline - EIA Scoping Notification and Consultation

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FAO HEAD OF PLANNING

Dear Sir/ Madam

Please see attached correspondence on the proposed Humber Low Carbon Pipeline project.

Please note that the deadline for consultation responses is **Tuesday 10 May 2022**, and is a statutory requirement that cannot be extended.

Kind regards
Laura



Laura Feekins-Bate | EIA Advisor
The Planning Inspectorate

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[REDACTED]

The Planning Inspectorate
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BS1 6PB

10/05/2022

By Email Only.

Dear Sir/Madam

APPLICATION REFERENCE NO: 144799

PROPOSAL: PINS consultation on behalf of SoS for its opinion (a scoping Opinion) as to the information to be provided in an Environmental Statement relating to the proposed development Ref: EN070006

LOCATION: Humber Low Carbon Pipelines

Thank you for your consultation request under regulation 10(6) of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017.

West Lindsey District Council, as a consultation body and host authority, wishes to make the following comments in regard to information to be provided with the Scoping Report. The following comments are made, following the structure of the Environmental Impact Assessment Scoping Report prepared by Arcadis (April 2022).

Reference is made throughout the Scoping Report to the Central Lincolnshire Local Plan Review. Please note consultation on the next stage of the CLLP review, a Proposed Submission Local Plan, is taking place between 16th March and 9th May 2022. Weight should be given to the draft Submission Local Plan, with greater weight the more that it advances. See <https://www.n-kesteven.gov.uk/central-lincolnshire/local-plan/>

3.8 Assessment of cumulative effects

The scoping report does not identify projects considered for their inter-project cumulative effects. It is advised that the V Net Zero Pipeline Project NSIP (EN070008) is scoped into this element of the ES.

10.6.2 Landscape Designations

The Scoping report does not identify local landscape designations, such as the Area of Great Landscape Value (designated by the Central Lincolnshire Local Plan). There are two in close proximity to the route corridor, the first runs along the Searby/Bigby escarpment and the second covers Brocklesby Park.

10.6.3 Landscape Character

This section does not appear to recognise local landscape guidance. In the West Lindsey District this is covered by the West Lindsey Landscape Character Assessment 1999 (<https://www.west-lindsey.gov.uk/planning-building-control/planning/planning-policy/evidence-base-monitoring/landscape-character-assessment>).

Please consider the above to constitute West Lindsey District Council's formal consultation response under reg10(6) of the Regulations.

Yours sincerely

Daniel Evans MSc
On behalf of West Lindsey District Council

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