



Meeting note

Project name	Humber Low Carbon Pipelines
File reference	EN070006
Status	Final
Author	The Planning Inspectorate
Date	14 February 2022
Meeting with	National Grid Carbon (NGC)
Venue	Virtual
Meeting objectives	Project Update
Circulation	All attendees

Summary of key points discussed and advice given

The Planning Inspectorate (the Inspectorate) advised that a note of the meeting would be taken and published on its website in accordance with section 51 of the Planning Act 2008 (the PA2008). Any advice given under section 51 would not constitute legal advice upon which applicants (or others) could rely.

Department for Business, Energy and Industrial Strategy (BEIS) Consultation Sequencing (Phase 2 etc)

On 19 October 2021, BEIS announced that the East Coast Cluster was confirmed as a track 1 cluster covering the Teeside and Humber regions, with British Petroleum (BP) as the lead operator. This confirmation provides for an opportunity to engage with government, BEIS, in respect of associated carbon capture usage and storage (CCUS) and Hydrogen business models. Track 1 negotiations were taking place and regular engagement with BEIS was ongoing. The Northern Endurance Partnership (NEP), also led by BP, is the developer for associated offshore components (including the Endurance Reserve) being delivered under the Petroleum Act and Energy Act respectively. Humber Low Carbon Pipelines (HLCP) would be the onshore transport and storage (T&S) development lead with a dual pipeline network, for both hydrogen and carbon dioxide (CO₂).

The Phase 2 cluster sequencing timeline was provided, the window in which potential emitters in the region bid to initially connect to any network. The expression of interest window was between 8 November and 2 December 2021, with engagement during December 2021 and January 2022. Submissions were made in January 2022. Following evaluation, an announcement of a short list of projects with sufficient maturity and ability to connect to the network would be made (expected in May 2022). Shortlisted applicants would be invited to participate in negotiations and due diligence before a decision in relation to allocation of support and project offers. This would then allow a Final Investment Decision (FID) to take place. Shortlisting criteria included consenting maturity. The shortlist would have implications for the HLCP project definition, programme, engagement and consultation.

Emitters and HLCP Interfaces

The Applicant was engaging with potential project interfaces. It had registered as an Interested Party (IP) for the Keadby 3 Low Carbon Gas Power Station (Keadby 3) project (ref EN010114), discussing Protective Provisions to future proof its novel technology. A Statement of Common Ground (SoCG) was under development and it was responding to the Examining Authority's (ExA) first written questions (ExQ1).

It was supporting the Drax Bioenergy with Carbon Capture and Storage (Drax BECCS) (ref EN010120) consultation, as well as submitting a formal consultation response. It highlighted potential themes in its responses to Drax BECCS and Keadby 3 relating to battery storage and above ground installations (AGI).

Further, HLCP responded to the public consultation for Equinor H2H Saltend project, which it is understood would be applying for consent under the Town and County Planning Act (TCPA) 1990 for its proposals. The subsequently publicly confirmed site was the basis for the Applicant's siting and routing considerations.

It registered as an IP for the Net Zero Teesside project and did not anticipate engagement outside of explaining the HLCP.

It registered as an IP for the Hornsea Project Four Offshore Wind Farm (Hornsea 4) project and would be attending the preliminary meeting (PM) due to the interfaces with its full chain. The Hornsea 4 ExA had requested a SoCG between the applicant and the Northern Endurance Partnership, National Grid Carbon Ltd, Drax Power Ltd and Equinor New Energy Ltd.

Since the project update meeting, the Applicant confirmed that following receipt of the Rule 8 letter and the clarifications contained within it, National Grid Carbon Limited (NGCL) made a submission on 8 March (Deadline 1). This submission outlined that the focus of NGCL and the Humber Low Carbon Pipelines Project is on terrestrial matters only but notes the reliance on the connection to the Endurance store.

Consenting Strategy

The project is predicated on the development of a dual pipeline to identified emitters, whilst ensuring flexibility for additional connections as identified. The project risk profile was under regular review and track 1 cluster objectives were being managed. The Applicant needed to navigate and pivot to variables relating to the Phase 2 BEIS consultation outcome, adoption of National Policy Statements (NPS) and anticipated regulation obligations/ business models. It had contributed to the BEIS draft NPS consultation in relation to potential Hydrogen and CO₂ policy. It queried the timescales for NPS adoption. The Inspectorate advised it had no information as to when the draft revised NPS would be adopted.

Preferred route corridor

As a result of continued engagement, technical and environmental work it had identified almost an end-to-end route corridor with the removal of optionality. Working with project partners, the proposed landfall location has been selected to take forward on the Holderness coast. This would be shared publicly in the coming weeks. This route corridor

would also be the focus for engagement and the basis for Environmental Impact Assessment (EIA) scoping in advance of statutory consultation.

Stakeholder Engagement and Programme

The non-statutory consultation feedback report was being prepared for publication. Principal feedback themes were compensation, construction, environment, safety, the need case (extending lifetime of fossil fuel reliance) and network section observations. A public update would be distributed to c.12,000 addresses to notify them of the project update and feedback report. A project brochure was being prepared to explain the update, which would be available on request in hard copy. The brochures would also be available at the deposit locations used during non-statutory consultation. Technical engagement continued in advance of EIA scoping. Discussions included proposed scoping methods to take forward, potential SoCG's and areas of agreement. The Applicant intended to increase public awareness of the Above Ground Installations (AGIs) along the proposed route, so there would be an understanding of this prior to statutory consultation in the summer 2022.

EIA Surveys and Scoping

The Applicant was discussing survey methodologies with Local Planning Authorities (LPA), statutory stakeholders and other environmental bodies. It continued efforts to liaise with Natural England (NE), sharing information and proposed approaches.

It intended to submit an EIA scoping request for the proposed route corridor and potential AGI sites in late March/Early April 2022, in advance of the BEIS phase 2 decision. The potential risks associated with this were discussed, should the BEIS announcement affect the red line boundary and bring in areas not subject to the scoping opinion. The Inspectorate noted the risk at the Acceptance stage if the Environmental Statement (ES) is missing consideration of a particular aspect/matter which the Inspectorate considers to impact on the adequacy of the ES. If there were substantive changes to the Proposed Development post-scoping, the Applicant could therefore consider the possibility of re-scoping, although it was acknowledged scoping is not a mandatory requirement.

The Applicant acknowledged the requirement for flexibility of design for the pipeline network and stated it would discuss any substantive changes post-scoping with the Inspectorate and other stakeholders. The Inspectorate acknowledged the work undertaken to refine the route corridor, noting that narrowing down options improves the ability of the Inspectorate and consultation bodies to provide detailed comments.

The Inspectorate advised the Applicant to provide a GIS shapefile at least 10 days in advance of the EIA Scoping request. If the Applicant has any established LPA contacts for the project which it would like the Inspectorate to direct the scoping consultation to then details could also be provided. It should also provide a test link for any file sharing site it intended to use. The Inspectorate highlighted [Advice Note 7](#), and advised that the file should be less than 50mb in size, to support sharing with consultees, ideally a single file or broken into two parts.

Update from Inspectorate

The Inspectorate highlighted the request from Net Zero Teesside to postpone the PM, to which the ExA sought comments and would be deciding on shortly.

Due to the government change in covid restrictions, ExA's would be starting to plan for blended events over the next few months. The Inspectorate advised the Applicant should consider potential venues and Audio Visual (AV) companies.

[Advice Note 8.4](#) and [Advice Note 6](#) were being updated to clarify the Inspectorate's position on the use of hyperlinks in submissions and USB's. References to submission of s46 notices by USB's were out of date as USB's could no longer be accessed.

AOB

The Inspectorate queried the programme for the NEP, and how much certainty there would be by the Examination. The Applicant offered to extend an invitation to the Oil and Gas Authority (OGA) for a forthcoming project update meeting. It was aware an informal consultation had been completed in respect of EIA scoping for the offshore components of NEP. The Inspectorate advised the Applicant to monitor any related ExA questions during the Net Zero Teesside Examination. It also signposted the Applicant to relevant questions that arose during the Yorkshire and Humber CCS Cross Country Pipeline Examination.

The Applicant queried whether there were any updates expected to the Inspectorate's guidance on compulsory acquisition in the context of biodiversity net gain (BNG). The Inspectorate noted it was meeting with Defra regularly regarding implications for BNG. As it stands, Applicants should seek their own legal advice and apply caution when it comes to seeking compulsory acquisition for the purpose of BNG, given that delivering BNG is not currently a legal requirement.

The Applicant would be considering the timing for the next project update meeting, either pre or post scoping, and would contact the Inspectorate in due course.