

Viking CCS Pipeline

**Environmental
Statement Volume IV –
Appendix 5-3:
Response to Scoping
Opinion**

Document Reference: EN070008/APP/6.4.5.3

Applicant: Chrysaor Production (U.K.) Limited,
a Harbour Energy Company
PINS Reference: EN070008
Planning Act 2008 (as amended)
The Infrastructure Planning (Applications: Prescribed Forms
and Procedure) Regulations 2009 - Regulation 5(2)(a)
Date: October 2023

PINS Reference	Document Reference	Document Revision	Date
EN070008	EN070008/APP/6.4.5.3	Revision 1	October 2023

Prepared by	Verified by	Approved by
HT	MW	NP
Principal EIA Consultant	EIA Technical Director	EIA Technical Director

Prepared by:

AECOM Limited
Exchange Station
Tithebarn Street
Liverpool
Merseyside
L2 2QP

© AECOM Limited. All rights reserved.

Table of Contents

1	Responses to Scoping Opinion	1
1.1	Introduction.....	1
1.2	The Inspectorate’s Scoping Opinion.....	2
1.3	Anglian Water	46
1.4	Boston Borough Council.....	50
1.5	The Coal Authority	51
1.6	East Lindsey District Council	52
1.7	East Riding of Yorkshire Council.....	54
1.8	Environment Agency.....	55
1.9	Historic England	64
1.10	Lincolnshire County Council	66
1.11	Mablethorpe and Sutton Town Council	76
1.12	Maritime & Coastguard Agency	77
1.14	Ministry of Defence.....	79
1.15	National Grid Electricity Transmission PLC (NGET)	80
1.16	National Grid Gas Plc	83
1.17	NATS En-Route Safeguarding.....	88
1.18	Newark and Sherwood District Council	88
1.19	NHS Lincolnshire CCG.....	89
1.20	Norfolk County Council.....	89
1.21	North East Lincolnshire Council.....	90
1.22	North East Lindsey Drainage Board	93
1.23	North Kesteven District Council	95
1.24	North Lincolnshire County Council	95
1.25	North Northamptonshire Council (East Northants Office)	98
1.26	Nottinghamshire County Council	98
1.27	Peterborough City Council.....	98
1.28	Royal Mail Group.....	99
1.29	Rutland County Council.....	100
1.30	Theddlethorpe All Saints and St Helens Parish Council	100
1.31	United Kingdom Health Security Agency	105
1.32	West Lindsey District Council	111
2	Late responses	112
2.1	Health and Safety Executive.....	112
2.2	Natural England.....	114
2.3	North Lincolnshire County Council	127

Tables

Table 1: Description of the Proposed Development	2
Table 2: EIA Methodology and Scope of Assessment	7
Table 3: Ecology and Biodiversity.....	8

Table 4: Landscape and Visual.....	16
Table 5: Historic Environment.....	19
Table 6: Geology and Hydrogeology	21
Table 7: Agriculture and Soils	23
Table 8: Water Environment	24
Table 9: Air Quality	27
Table 10: Noise and Vibration	29
Table 11: Traffic and Transport	32
Table 12: Socio-economics	35
Table 13: Health and Wellbeing.....	38
Table 14: Materials and Waste	39
Table 15: Climate Change	42
Table 16: Cumulative Effects	43
Table 17: Major Accidents and Disasters.....	44
Table 18: Anglian Water.....	46
Table 19: Boston Borough Council	50
Table 20: The Coal Authority	51
Table 21: East Lindsey District Council	52
Table 22: East Riding of Yorkshire Council.....	54
Table 23: Environment Agency	55
Table 24: Historic England.....	64
Table 25: Lincolnshire County Council	66
Table 26: Mablethorpe and Sutton Town Council	76
Table 27: Maritime & Coastguard Agency	77
Table 28: Ministry of Defence	79
Table 29: National Grid Electricity Transmission PLC (NGET)	80
Table 30: National Grid Gas Plc	83
Table 31: NATS En-Route Safeguarding	88
Table 32: Newark and Sherwood District Council.....	88
Table 33: NHS Lincolnshire CCG	89
Table 34: Norfolk County Council	89
Table 35: North East Lincolnshire Council.....	90
Table 36: North East Lindsey Drainage Board	93
Table 37: North Kesteven District Council	95
Table 38: North Lincolnshire County Council.....	95
Table 39: North Northamptonshire Council (East Northants Office)	98
Table 40: Nottinghamshire County Council	98
Table 41: Peterborough City Council	98
Table 42: Royal Mail Group	99
Table 43: Rutland County Council	100
Table 44: Theddlethorpe All Saints and St Helens Parish Council	100
Table 45: United Kingdom Health Security Agency	105
Table 46: West Lindsey District Council	111
Table 47: Health and Safety Executive.....	112
Table 48: Natural England.....	114
Table 49: North Lincolnshire County Council.....	127

1 Responses to Scoping Opinion

1.1 Introduction

- 1.1.1 This appendix provides a comment-by-comment copy of the Planning Inspectorate's Scoping Opinion (05 May 2022). A response is provided against each comment to explain how the comment has been addressed in the Environmental Statement (ES).
- 1.1.2 The scope and extent of the study area considered in the Scoping Report was sufficiently broad to accommodate the DCO Site Boundary as now presented. Where methodologies have been updated since the Scoping Opinion was sought, for example due to changes in guidance or legislation, the most recent methodology has been implemented. More information on how the Applicant has responded to the Scoping Opinion is set out in each of the topic specific Chapters of the Environmental Statement (*ES Volume II: Application Document 6.2*).
- 1.1.3 It should be noted that in October 2022, the name of the Proposed Development was changed from the V Net Zero pipeline to the Viking CCS Pipeline. This was to better reflect the strength of the project's carbon capture and storage capabilities. This name change took place following the initial and further non-statutory consultations, but ahead of the Statutory Consultation.
- 1.1.4 **Table 1** to **Table 17** provides the Applicant's responses to comments made by the Planning Inspectorate under each topic area.
- 1.1.5 **Table 18** to **Table 49** provide the Applicant's responses to each comment made by the prescribed consultees.

1.2 The Inspectorate’s Scoping Opinion

Table 1: Description of the Proposed Development

ID	Ref	Description	The Inspectorate’s Comments	Applicant’s Response
2.1.1	Figure 2-3	Unidentified mapped feature	Figure 2-3 (3 of 3) shows a series of green lines offshore at Saltfleet. It is not clear from the key what feature the lines represent. All figures presented in the ES should be clear and complete.	The green lines at Saltfleet demarcated the boundary edge of the Saltfleetby-Theddlethorpe Dunes & Gibraltar Point Special Area of Conservation (SAC). All ES figures (Applicant Document 6.3) have been designed to be clearer especially in instances where designations overlap.
2.1.2	Section 2.2	Proposed Development technical capacity	Paragraph 2.2.5 of the Scoping Report identifies the aim of the overall V Net Zero Transportation and Storage Scheme, of which the Proposed V Net Zero Pipeline is a key element, to store up to 11 million tonnes of CO ₂ annually by 2030 and more than 12 million tonnes annually by 2034. Where achievable, the ES should set out the predicted annual storage per year starting from first operation of the Proposed Development and the overall total predicted tonnes of CO ₂ stored over the lifetime of the proposals.	As stated in <i>ES Volume II Chapter 3 Description of the Proposed Development (Application Document 6.2.3)</i> , there are several potential ramp-up profiles for the pipeline system which are dependent upon emitters timescales and flowrates. The CO ₂ ramp-up profiles have estimated a low, medium and high scenario as 6, 10 and 18 million tonnes per year respectively.
2.1.3	Section 2.5, 2.15	Pipeline crossing methodology	Paragraph 2.5.20 explains that open cut trench installation is the likely crossing method to be adopted, with consideration given to trenchless techniques in particular locations. The further information in Table 2-4 and Section 2.15 is noted. Where a particular installation method at a particular location is committed to or assumed for the purposes of	<i>ES Volume IV Appendix 3.2 Crossing Schedule (Application Document 6.4.3.2)</i> details each crossing required for the Proposed Development as well as the method in which it will be crossed, whether open cut or trenchless. These are displayed

ID	Ref	Description	The Inspectorate's Comments	Applicant's Response
			assessment, this must be clearly explained in the ES and secured in the dDCO.	in <i>ES Volume III Figure 3.9 (Application Document 6.3.3.9)</i> .
2.1.4	Paragraph 2.8.2	Pipeline assessment sections description	The Scoping Report identifies the total approximate length of the onshore pipeline component of the Proposed Development, however Table 2-3 which describes each section (Section A to E) does not provide an approximate length for each section. This information should be provided in the ES.	An appropriate length for each section of the pipeline component of the Proposed Development is detailed in Table 3-1 of <i>ES Volume II Chapter 2 (Application Document 6.2.2)</i> .
2.1.5	Paragraph 2.9.3	Shutdown valves and compounds description	Paragraph 2.9.3 explains that further design work is ongoing with respect to the location of the proposed shutdown valves required for the Proposed Development. The Inspectorate would expect information on the number, location, and scale of the shutdown valves and their compounds to be provided in the ES. Where flexibility is being sought in this regard, it should be set out in the ES and the assessed parameters should be clearly defined.	Two Emergency Shutdown Valves (ESDV) will be required and situated within the proposed Immingham and Theddlethorpe Facility. The one at the Theddlethorpe Facility is existing, and work will be undertaken to check if the existing equipment is suitable for future use. However, for the purposes of the assessment, the worst-case scenario has been assessed, which is full removal, replacement and re-installment of the existing shutdown valve at the Theddlethorpe Facility. For more information refer to <i>ES Volume II Chapter 3 (Application Document 6.2.3)</i> .
2.1.6	Section 2.11	Monitoring and utility systems	Section 2.11 does not explain the land use requirements or location of the proposed monitoring and utility systems. The Inspectorate would expect this information to be provided in the ES, which should also explain where flexibility is being sought, if applicable, and define the parameters which have been assessed.	During operation regular inspections will ensure the system is maintained free from defects or damage and in a safe condition to operate. There will be 24-hour monitoring of the pipeline operations and facilities will be provided to enable routine internal

ID	Ref	Description	The Inspectorate's Comments	Applicant's Response
				inspection of the pipeline and its wall thickness. The required electrical connections for the permanent facilities components of the Proposed Development and their parameters are detailed in <i>ES Volume II Chapter 2 (Application Document 6.2.2)</i> .
2.1.7	Section 2.14	Potential repair/remedial works to LOGGS pipeline	Section 2.14 of the Scoping Report explains that further inspections of the existing Lincolnshire Offshore Gas Gathering System (LOGGS) pipeline will be required but does not provide any information on potential remedial works to the pipeline that may be required in advance of its utilisation for the Proposed Development. The ES should include this information and an assessment of any likely significant effects, where these could occur.	<p>Several assessments have been undertaken of the existing LOGGS pipeline including a fracture assessment and a CO₂ corrosion assessment. In addition, previous pipeline inspection reports have been used to undertake an integrity assessment all of which have resulted in high confidence that the pipeline will be suitable for the transportation of the CO₂ as part of the wider Viking CCS Project.</p> <p>The base case for assessment purposes is therefore that no remedial works will be required on the existing LOGGS pipeline.</p>
2.1.8	Section 2.15	Demolition requirements	The photographs provided at Figure 2-4 (Potential Pipeline Offtake Facility Site at Immingham) and Figure 2-5 (Former TGT Site and location for tie-in and outlet facilities) show open land with no existing structures. It is understood from Paragraph 2.14.2 that existing onshore valves at the LOGGS site will be replaced. Demolition of existing built structures is not mentioned,	Demolition works are not anticipated. The former Theddlethorpe Gas Terminal (TGT) site is already fully demolished (Theddlethorpe Facility Option 1) and other land required for the Proposed Development is brownfield or greenfield.

ID	Ref	Description	The Inspectorate's Comments	Applicant's Response
			<p>however if this is required this information should be provided in the ES and considered as part of the assessment of significant effects.</p>	
2.1.9	Section 2.15	Temporary construction works	<p>The Scoping Report does not explicitly state whether the proposed temporary accesses, construction compounds and laydown areas will be within the Scoping Boundary presented. For the avoidance of doubt, this has been assumed to be the case for the purposes of this Scoping Opinion.</p>	<p>The proposed temporary accesses, construction compounds and laydown areas are all included within the DCO Site Boundary and have been assessed within the EIA.</p>
2.1.10	Section 2.16	Operational phase	<p>Paragraph 2.16.1 of the Scoping Report refers to a control room, however the location and nature of this component of the Proposed Development is not described. The information in Section 2.16 is limited and does not provide a description of operational activity at the proposed offtake facility, along the pipeline route, or at the TGT site offshore pipeline tie-in facility, although the use of Pipe Inspection Gauges (PIG) is mentioned. This information should be provided in the ES.</p>	<p>A full description of the permanent facilities, namely the Immingham Facility, Block Valve Stations and Theddlethorpe Facilities, of the Proposed Development is provided in <i>ES Volume II Chapter 3 (Application Document 6.3.3)</i>.</p>
2.1.11	Section 2.4, 2.8, and 4.3	Flexibility - limits of deviation	<p>Paragraph 2.4.3 and 2.8.3 of the Scoping Report discuss the use of limits of deviation and the expectation of this to be 100m (unspecified as horizontal or vertical but assumed to be the former from the information in Section 4.3) for the Proposed Development. The ES must explain the development parameters it is based on, and these should be specified. Vertical and horizontal limits of deviation should be given, with cross reference to where these are to be secured in the draft DCO.</p>	<p>The Order Limits are typically a minimum of 100 m wide and the pipeline construction working width would be a maximum of 30 m along the majority of the route, located within the Order Limits. The only exceptions to this would be at major crossings of roads, railways or watercourses where the working width may be greater than 30 m. It is typical for a DCO (especially linear schemes) to include the ability to alter</p>

ID	Ref	Description	The Inspectorate's Comments	Applicant's Response
				<p>the final design of a scheme by having such flexibility, to allow for minor route alterations during construction. In terms of the vertical limits, the majority of the pipeline will be buried to a minimum depth of 1.2 metres, whilst the pipeline may be buried to a depth of up to 20 metres for particular trenchless crossing locations, subject to agreement with the Environment Agency.</p>

Table 2: EIA Methodology and Scope of Assessment

ID	Ref	Description	Inspectorate's comments	Applicant's response
2.2.1	Table 1-1, Appendix C, Section 4.5	Transboundary effects	<p>The transboundary effects screening matrix is referred to as Appendix E in Table 1-1 and Section 4.5 of the Scoping Report, however this information is provided in Appendix C. The Inspectorate on behalf of the SoS has considered the description of the Proposed Development and its likely transboundary effects provided within Scoping Report Section 4.5 and Appendix C. The Inspectorate concludes that the Proposed Development is unlikely to have a significant effect either alone or cumulatively on the environment in a European Economic Area State. In reaching this conclusion the Inspectorate has identified and considered the Proposed Development's likely impacts including consideration of potential pathways and the extent, magnitude, probability, duration, frequency and reversibility of the impacts. 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>	Noted – no response required.

Table 3: Ecology and Biodiversity

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments	Applicant's response
3.1.1	Table 6-2	Impacts to foraging/commuting bats	<p>The Scoping Report identifies the intention to limit bat activity surveys to areas of suitable habitat which will be permanently lost. The Inspectorate accepts, as stated in Table 6-2, that such surveys may not be warranted in relation to temporary habitat loss. However, the Inspectorate considers that they may be required to inform the assessment of likely significant effects and the design of appropriate mitigation in relation to the effects of construction lighting and effects resulting from impacts to linear habitat features. These matters should be considered in the ES where likely significant effects could occur, supported by appropriate evidence such as bat activity survey data. The Applicant should seek agreement from relevant consultees and provide a description of the approach taken in the ES, incorporating any relevant advice.</p>	<p>Linear features such as hedgerows and watercourses are present within the DCO site boundary and will be temporarily impacted by the Proposed Development. Bat crossing point surveys and emergence surveys have been completed to inform the ecological baseline. The route has been designed to minimise effects upon woodland and HDD will be used to avoid habitat loss at Immingham. The preferred pipeline route will be micro sited within the DCO Site Boundary to avoid mature trees and use existing gaps in hedgerows where possible. Lighting will be avoided where possible during the construction phase, and any necessary lighting will be directed away from trees, hedgerows and watercourses to maintain dark corridors. Any sections of hedgerows temporarily lost during construction will be reinstated.</p>
3.1.2	Table 6-2, Table 6-5	Detailed terrestrial invertebrate surveys	<p>The Scoping Report proposes to scope out detailed terrestrial invertebrate surveys on the basis that areas of high habitat suitability are likely to be avoided by the Proposed Development which is located in predominantly arable land. It also</p>	<p>Invertebrate surveys were completed to inform the Humber Zero Phase 1 Project (Ref 6-33) and the results of these surveys have been used to inform the ecological baseline.</p>

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments	Applicant's response
			<p>explains that the requirement for such surveys will be reviewed following the completion of the Phase 1 habitat survey and desk study. The Inspectorate notes that neither the Potential Pipeline Offtake Facility Site at Immingham nor the Former TGT Site are situated on arable land.</p> <p>In the absence of the habitat survey and desk study information, and of evidence demonstrating clear agreement with relevant statutory bodies, the Inspectorate does not agree to scope this matter out at this stage but agrees that it may be appropriate to scope out detailed surveys once the results of these investigations are known. The ES should include an assessment of effects on terrestrial invertebrates, or the information referred to above to evidence that no likely significant effects would occur.</p>	<p>Habitats at the former TGT site comprised bare ground and were considered unlikely to support a protected or notable invertebrate assemblage (refer to <i>ES Volume IV Appendix 6-1 (Application Document 6.4.6.1)</i>).</p>
3.1.3	Table 6-2, Table 6-5	Detailed surveys for reptile species	<p>The Scoping Report states that areas of high habitat suitability for reptiles are likely to be avoided by the Proposed Development meaning that detailed surveys are not likely to be required but that the need for such surveys will be reviewed following completion of the Phase 1 habitat survey and desk study. In the absence of this information, and of evidence demonstrating agreement with the relevant statutory bodies, the Inspectorate does not agree to scope out detailed assessment for reptiles at this stage but agrees with the approach set out. Accordingly, the ES should include an assessment</p>	<p>Habitats where the Immingham Facility is proposed have suitability to support reptiles.</p> <p>Reptile surveys were completed to inform the Humber Zero Phase 1 Project (Ref 6-33 in <i>ES Volume II Chapter 6 (Application Document 6.2.6)</i>) reptiles were confirmed to be absent. The results of these surveys have been used to inform the ecological baseline. There is potential for species such as grass snake (<i>Natrix natrix</i>) to be present</p>

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments	Applicant's response
			or the information referred to demonstrating the absence of a likely significant effect.	along watercourses and drainage ditches within the DCO Site Boundary. Precautionary working methods are recommended to avoid effects upon reptiles during the construction phase.
3.1.4	Table 6-2, Table 6-5	Aquatic ecology – specific flora and fauna surveys	The Scoping Report suggests that predicted temporary construction impacts will be adequately addressed through standard mitigation techniques, therefore specific aquatic flora and fauna surveys are unlikely to be required. In the absence of information such as river crossing methodologies and the mitigation techniques to be employed, the Inspectorate is not in a position to agree to scope these matters from the assessment. The Inspectorate accepts that as this information becomes known the scope of the assessment could be refined, however. Accordingly, the ES should include an assessment of likely significant effects on aquatic flora and fauna where these could occur, or the information referred to demonstrating that no likely significant effects will occur and detailing where agreement has been reached with the relevant consultation bodies.	A suite of terrestrial, aquatic and ornithology surveys have been completed to inform the ecological baseline and the potential for significant effects upon flora and fauna has been assessed within this <i>ES Volume II Chapter 6 (Application Document 6.2.6)</i> .
3.1.5	Table 6-4 and Chapter 12 (Air Quality Chapter 12)	Air quality effects on sensitive ecological receptors	Table 6-4 does not identify Nitrogen deposition or acid deposition as potential impacts which could affect sensitive ecological receptors; however these matters are not explicitly proposed as scoped out. It is noted that Chapter 12 of the Scoping Report (Air Quality) considers these potential impacts as a	Construction phase vehicle movements have been screened using the screening criteria provided by the DMRB and the results are presented in this <i>ES Volume II Chapter 14 (Application Document</i>

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments	Applicant's response
			<p>possibility and sets out the approach to modelling relevant emissions from construction traffic if detailed assessment is deemed necessary (see Table 3.7 below). For the avoidance of doubt, the potential for Nitrogen deposition and/or acid deposition to arise and result in effects on ecological receptors should be considered in the ES, and subject to assessment where a pathway for significant effects is identified.</p>	<p>6.2.14). It was found that no links within 200m of a designated sensitive ecological receptor exceed the screening criteria provided by DMRB of a change in AADT flows of 1,000 vehicles or 200 HDV, and therefore a detailed assessment of road traffic emissions and their impact on designated sensitive habitat is not required to inform the ES.</p>

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments	Applicant's response
3.1.6	Table 6-1, Figure 6-1, Paragraph 6.2.7	Location of designated sites	The information in Table 6-1 does not appear to be consistent with the information in Figure 6-1 in terms of the proximity of the Proposed Development to the designated sites. Paragraph 6.2.7 provides more information however; it remains unclear if the Proposed Development lies within these designations. This must be clarified within the ES.	Information on Statutory designated sites including distances and directions from the Proposed Development are provided in Section 6.5 of <i>ES Volume II Chapter 6 (Application Document 6.2.6)</i> .
3.1.7	Para 6.2.13 to 6.2.15	Impacts to existing agricultural drainage and effects on habitats	The Scoping Report indicates a likely commitment to trenchless crossing of watercourses in the ES, but also describes the potential for direct impacts to grazing marsh where the proposed pipeline route crosses this habitat. The intention to assess impacts related to construction activities is set out, however, the Inspectorate advises that the ES should also explain whether significant effects could arise from impacts to existing agricultural drainage, including effects on habitats outside of agricultural land relating to hydrological changes or degradation of water quality.	The Proposed Development has been designed to avoid areas of floodplain grazing marsh. The potential for effects upon hydrology are assessed in <i>ES Volume II Chapter 11: Water Environment (Application Document 6.2.11)</i> .

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments	Applicant's response
3.1.8	Para 6.3.7 to 6.3.9	Identification of functionally linked land and ornithological survey scope	The justification in the Scoping Report for the selection of the functionally linked land described is lacking in detail. The Inspectorate would expect the ES to give a full description of how these areas have been identified, the levels of precaution applied to this process, and the outcomes of consultation and degree of agreement reached with key stakeholders. It is also advised that the scope and methodology of the ornithological surveys is discussed with the relevant consultees and agreed where possible.	Additional information on the identification of functionally linked land is provided in paragraphs 6.3.11 – 6.3.15 of the Baseline Ornithology Report (<i>ES Volume IV Appendix 6-7 (Application Document 6.4.6.7)</i>); the survey methods applied across these areas and elsewhere within the environs of the Proposed Development are described in detail in paragraph 6.3.16 – 6.3.46 of the same appendix.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments	Applicant's response
3.1.9	Table 6-2	Great crested newts - information to support the assessment of effects	<p>The Scoping Report states that the presence/absence surveys proposed in Table 6-2 will be sufficient to support an application for a traditional European Protected Species Mitigation licence or a licence through the Natural England District Level Licensing (DLL) scheme. It also sets out the circumstances where populations size class assessment may be undertaken to inform the assessment of effects. 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>	<p>District Level Licensing (DLL) will be used to avoid significant effects upon GCN. The IACPC is provided in <i>ES Volume IV Appendix 6-9 (Application Document 6.4.6.9)</i>.</p>

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments	Applicant's response
3.1.10	NA	Confidential Annexes	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 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.	Information on sensitive species has been provided in a Confidential Appendix.

Table 4: Landscape and Visual

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments	Applicant's response
3.2.1	Table 7-7	Effects on landscape character during operation as a result of the introduction of the pipeline (operation)	<p>The Applicant proposes to scope out long term operational effects on landscape character as a result of the introduction of the pipeline. The Applicant states that the pipeline would be buried and would not affect landscape character. Therefore, operational phase effects associated with the pipeline would be scoped out of the LVIA.</p> <p>The Inspectorate considers that whilst in general the introduction of the pipeline is unlikely to give rise to significant long-term effects on landscape character during operation of the Proposed Development, it is unclear whether any easement required would result in permanent landscape changes and the potential for such effects should be considered. The ES should also assess the potential for significant short-term effects during the beginning of the operational phase, as proposed reinstatement measures mature along the pipeline route.</p>	<p>Short-term effects during the beginning of the operational phase and the easement required and its impacts on the reinstatement of landscape features has been considered within <i>Section 7.8 Potential Impact and Assessment of Effects in ES Volume II Chapter 7: Landscape and Visual</i>. Table 7-16 of Error! Reference source not found. provides a summary of the operational phase residual landscape effects for Year 1 and Year 15.</p>
3.2.2	Table 7-7	Effects on visual amenity during operation as a result of the introduction of the pipeline	<p>The Applicant intends to scope out long term operational effects on visual amenity as a result of the introduction of the pipeline. The Applicant states that the pipeline would be buried and would not impact visual amenity. Therefore, operational phase effects associated with the pipeline would be scoped out of the LVIA. The Inspectorate considers that whilst generally the introduction of the pipeline is unlikely to give rise to significant long-term effects on visual</p>	<p>Short-term effects during the beginning of the operational phase and the easement required and its impacts on the reinstatement of landscape features has been considered within <i>Section 7.8 Potential Impact and Assessment of Effects in Chapter 7: Landscape and Visual</i>. Table 7-16 provides a</p>

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments	Applicant's response
			<p>amenity during operation of the Proposed Development, it is unclear whether any easement required would result in permanent changes to visual amenity and the potential for such effects should be considered. The ES should also assess the potential for significant short term effects during operation as proposed hedgerow and other vegetation mitigation matures along the pipeline route.</p>	<p>summary of the operational phase residual landscape effects for Year 1 and Year 15.</p>
3.2.3	Table 7-7	<p>Effects on landscape character and visual amenity during decommissioning of the Pipeline Offtake Facility, shutdown valves and offshore pipeline tie-in and outlet</p>	<p>The Applicant proposes to scope out effects on landscape character and visual amenity during decommissioning of the Pipeline Offtake Facility, shutdown valves and offshore pipeline tie-in and outlet. The Scoping Report states that the temporary and limited nature of the decommissioning of these features of the Proposed Development is not anticipated to give rise to any significant effects. It is noted that the specific decommissioning methodology is not known at this stage, however, the Scoping Report states that there are a number of ways the redundant pipeline could be dealt with, including being lifted and removed where appropriate. In the absence of more detailed information relating to the decommissioning phase of the Proposed Development, the Inspectorate does not agree to scope these matters from the assessment. Therefore, the ES should include an assessment of this matter or provide information to demonstrate the absence of a likely significant effect.</p>	<p>Decommissioning has been assessed within <i>Section 7.8 Potential Impacts and Assessment of Effects</i> in <i>Chapter 7: Landscape and Visual</i> of the ES.</p>

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments	Applicant's response
3.2.4	Paragraph 7.2.17	Viewpoint locations	The Applicant should make effort to agree the number and location of the viewpoints with relevant consultation bodies.	<p>The number and location of viewpoints has been agreed with the relevant stakeholders including the host local planning authorities and statutory consultees.</p> <p>A summary of stakeholder engagement is provided in Table 7-3 – Table 7-5 and representative viewpoints are described within Table 7-12 of <i>ES Volume II Chapter 7: Landscape and Visual (Application Document 6.2.7)</i>.</p>

Table 5: Historic Environment

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments	Applicant's response
3.3.1	Table 8-3	Effects during decommissioning	The Applicant intends to scope out effects on all heritage assets during decommissioning of the Proposed Development. The Scoping Report states that decommissioning is unlikely to result in additional temporary or permanent impacts on heritage assets. In the absence of more detailed information relating to the decommissioning phase of the Proposed Development, the Inspectorate does not agree to scope these matters from the assessment. Therefore, the ES should include an assessment of decommissioning effects on heritage assets or provide information to demonstrate the absence of any likely significant effects.	The ES considers decommissioning effects on heritage assets at paragraph 8.7.172 in section 8.7, Potential Impacts and Effects in <i>ES Volume II Chapter 8 Historic Environment (Application Document 6.2.8)</i> .

ID	Ref	Description	Inspectorate's comments	Applicant's response
3.3.2	Paragraph 2.15.19; Paragraph 8.4.1; Paragraphs 8.4.6 and 8.4.7.	Historic environment surveys	The Scoping report states that a Desk-Based Assessment (DBA) will be prepared to inform the archaeology and cultural heritage ES chapter and will also be used to “confirm whether any additional survey work is required to better determine the nature, extent and origin of buried archaeological remains...within the construction footprint of the Proposed Development”. As noted in Paragraph 2.15.19, mechanical excavators will be used to dig the pipeline trench down to a minimum depth of 1.8 metres and as the extent of archaeological remains is unknown at this stage. The Inspectorate is of the opinion that should the DBA identify the need for further investigation, such as geophysical survey, hand auger survey, monitoring of geotechnical ground investigations	The scope of current geophysical surveys (<i>ES Volume IV, Appendix 8-3</i>) has been agreed with the relevant local authority archaeologists at North Lincolnshire Council, North East Lincolnshire Council and Lincolnshire County Council. A WSI for archaeological evaluation is included at ES Volume 4, Appendix 8-4; this will also be agreed with the

ID	Ref	Description	Inspectorate's comments	Applicant's response
			and / or trial trenching, effort should be made to agree the scope of such activities with the relevant local authority archaeologists.	relevant local authority archaeologists.
3.3.3	Paragraphs 8.4.2 and 8.4.3	Study Area	The Scoping Report states that a general study area of 1 km from the Scoping Boundary for non-designated assets and 2 km for designated assets will be used to collect detailed information on the cultural heritage baseline to be used in the assessment. However, Paragraph 8.4.3 notes that a wider study area may be used to identify assets whose setting may change as a result of the construction and / or operation of the Proposed Development and this will be informed by the site walkover, setting assessment, and the Zone of Theoretical Visibility (ZTV). The study area applied in the ES to assess the potential effects to the setting of all designated heritage assets should also be discussed with the relevant stakeholders, in particular the Local Planning Authority experts, to ensure it is appropriate to the construction, operation and decommissioning of the Proposed Development.	Consultation with the relevant heritage stakeholders has been undertaken to discuss the Study Area for the full assessment, though this matter has not been agreed.
3.3.4	Section 8.6	Potential effects during construction	Physical impacts to buried archaeological assets could include compaction during construction, which is not explicitly identified in the Scoping Report. The ES should consider the potential for construction works to give rise to likely significant effects from compaction.	Compaction is considered in the assessment of potential impacts and effects in section 8.7 of the <i>ES Volume II Chapter 8 Historic Environment (Application Document 6.2.8)</i> .

Table 6: Geology and Hydrogeology

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments	Applicant's response
3.4.1	Section 9.6	Assessment of radiation	The Inspectorate accepts that, based on the nature of the Proposed Development, significant effects from radiation emissions are unlikely and agrees that this can be scoped out of the ES.	No response required.

ID	Ref	Description	Inspectorate's comments	Applicant's response
3.4.2	Paragraph 9.2.12	Water Framework Directive (WFD) groundwater bodies	The Scoping Report identifies two WFD groundwater bodies. The ES should address any potential for impacts on these features to impact on surface water receptors, and the implications for the requirements of the WFD. Cross reference to the proposed Water Environment chapter of the ES and any separate WFD assessment produced should be provided where necessary.	These have been considered within <i>ES Volume II Chapter 11 Water Environment (Application Document 6.2.11)</i> .
3.4.3	Table 9-5	Location of brownfield sites	Table 9-5 states that " <i>According to North Lincolnshire Council data there are no brownfield sites within 500m of the Scoping Boundary</i> ". It is not clear what definition is used to define Brownfield sites. In the case that this specifically refers to sites designated under part II(a) of the Environmental Protection Act 1990, the Inspectorate considers that the potential exists for non-designated brownfield sites, or other areas subject to contamination of land or controlled waters, to exist within the study area. The ES should consider the potential effects to and from all possible sources of contamination identified within the baseline data.	<i>Volume II Chapter 9 Geology and Hydrology (Application Document 6.2.9)</i> considers the potential effects from all possible sources of contamination identified within the baseline data and not just sites designated under part II(a) of the Environmental Protection Act 1990.
3.4.4	Paragraph 9.5.2	Construction phase effects	Bullet points 2, 3 and 4 of section 9.5.2 relate to the potential effects on soil quality including substructure damage,	This comment has been taken on board and the

ID	Ref	Description	Inspectorate's comments	Applicant's response
			<p>compaction and waterlogging. Bullet point 8 relates to the possibility of encountering Unexploded Ordnance (UXO). The Inspectorate considers that overlap exists for these matters with other environmental aspect assessments, namely Agriculture and Soils, Water Environment, and Major Accidents and Disasters. The ES should explain the matters to be addressed in each of these chapters and clearly set out where these matters interact.</p>	<p>scope of each chapter is clearly outlined, and where matters interact, cross-referencing to other chapters is included.</p>
3.4.5	Paragraph 9.5.3	Effects on foundations and the main pipeline construction	<p>Paragraph 9.5.3 notes that there is the potential for aggressive ground conditions to pose a physical risk to the pipeline and the foundations of any structures, however no further details of assessment are provided. The ES should assess any likely significant effects from physical damage to the pipeline from aggressive ground conditions (or other sources such as accidental damage from other parties during future works) and set out any proposed mitigation where required.</p>	<p>No aggressive ground conditions which could affect buried concrete during construction, the pipeline or structure foundations have currently been identified. This will be assessed further once the findings of the ground investigation are available.</p>
3.4.6	Paragraph 9.5.4	Decommissioning effects	<p>It is noted that the specific decommissioning methodology is not known at this stage, including whether or not the pipeline could be removed. Given this, the Inspectorate considers that the identified potential effects from the construction phase could all be relevant to the decommissioning phase considering the likelihood that working methods would be similar. The ES should assess all possible likely significant effects during the decommissioning phase.</p>	<p><i>Volume II Chapter 9 Geology and Hydrology (Application Document 6.2.9)</i> has assessed the likely significant effects which may occur during the decommissioning phase.</p>

Table 7: Agriculture and Soils

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments	Applicant's response
3.5.1	Paragraph 10.7.3	Operational effects on agriculture and soils (including loss of BMV land)	Based on the nature of the Proposed Development, the Inspectorate considers that significant effects on agriculture and soils are unlikely during operation and agrees that the effects of the operational phase on agriculture and soils can be scoped out of the ES.	Operational effects have been scoped out of the agricultural and soils assessment, in agreement with The Planning Inspectorate.

Table 8: Water Environment

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments	Applicant's response
3.6.1	Paragraph 11.8.10, Table 11-13	Hydraulic Modelling (pipeline component)	The Inspectorate has considered the information provided and considers that Hydraulic Modelling can be scoped out of the assessment in relation to the buried pipeline. It is noted that assessment of flood risk in relation to the other components of the Proposed Development is to be included in the ES. The approach to this assessment should be discussed with the relevant stakeholders and agreement sought on the methodology applied.	The approach to the assessment has been agreed through the scoping opinion, PEIR and through stakeholder consultation (see Table 11.4 of <i>Volume II Chapter 11 Water Environment (Application Document 6.2.11)</i>).
3.6.2	Paragraph 11.8.10, Table 11-13	Foul drainage and Potable water Supplies	The Inspectorate considers that matters relating to Foul Drainage and Potable Water supplies should be assessed in the ES, where significant effects may arise as a result of the Proposed Development. The Inspectorate advises that advice is sought from the relevant consultees, in particular Anglian Water, to establish the likely risks in these regards.	These were initially scoped out as the risk from foul drainage / potable supply may be very low if there are few permanent staff on site in the long term. However, this has been scoped back into the chapter to ensure that the foul drainage / water demand will not result in any significant effects to surface water features or resources. The supply/demand has been identified and is addressed within the ES, following stakeholder engagement with Anglian water. This chapter includes an assessment of whether this results in any significant effects (Section 11.7 of <i>Volume II Chapter 11 Water Environment (Application Document 6.2.11)</i>).

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments	Applicant's response
3.6.3	Section 11.6, Table 11-13	Potential effects	In addition to the identified matters Proposed to be assessed, the ES should include an assessment of the likely significant effects of artesian groundwater conditions, and the presence of unique groundwater features (e.g., blow wells, chalk streams and springs), where these could occur.	The assessment of effects to groundwater, including unique groundwater features, is presented in Chapter 9: Geology and Hydrogeology. Where these groundwater features may result in a significant effect to surface water features these have been considered including dewatering (Section 11.7 of <i>Volume II Chapter 11 Water Environment (Application Document 6.2.11)</i>).

ID	Ref	Description	Inspectorate's comments	Applicant's response
3.6.4	Paragraph 11.2.15	Presence of Ordinary Watercourses	<p>The Scoping Report states that there are likely to be over 100 ordinary watercourses within 500m of the scoping boundary, including streams, drainage dykes, field drains and artificial waterbodies.</p> <p>The ES should provide information on potential likely significant effects on or associated with ordinary watercourses, in particular where they are hydrologically linked to main rivers.</p>	An exercise has been undertaken to identify all watercourses within the Study Area, including Ordinary Watercourses. Potential likely significant effects to Ordinary Watercourses have been identified and are included within this chapter. Stakeholder engagement with the Environment Agency (EA), local drainage boards and Lead Local Flood Authorities (LLFAs), as well as a best endeavours to visits to all Main Rivers and the

ID	Ref	Description	Inspectorate's comments	Applicant's response
				<p>majority of Ordinary Watercourses, which are directly crossed by the Proposed Development, has taken place to confirm the importance associated with Ordinary Watercourses (<i>ES Volume IV: Appendix 11.2 - Site Visit Technical Note (Application Document 6.4.11.2)</i>).</p>

Table 9: Air Quality

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments	Applicant's response
3.7.1	Paragraph 12.4.1, Paragraph 12.6.7	Air quality survey and detailed assessment	<p>The Scoping Report states that based on similar projects and known Air Quality Management Area (AQMA) locations; detailed assessment of construction vehicle impacts is unlikely to be required. Detailed assessment is proposed to be scoped out unless modelling of construction phase vehicle movements is identified as required through consultation, or through further information becoming available regarding construction traffic and routing.</p> <p>Based on the scale and nature of the proposals, and given the information provided in the Scoping Report on the receiving environment and the screening criteria applied, the Inspectorate is content with this approach. The description of development provided in the ES should set out the anticipated vehicle movements in construction to demonstrate that relevant thresholds for further assessment would not be exceeded. The Inspectorate also advises that the rationale and justification for the approach taken is fully explained in the ES.</p>	<p>The Planning Inspectorate agrees that a detailed assessment of construction vehicle impacts is not required, however given the scale and nature of the Proposed Development. Construction phase vehicle movements have been screened using the IAQM screening criteria and the results are presented in <i>ES Volume II Chapter 14 Air Quality (Application Document 6.2.14)</i>.</p>
3.7.2	Paragraph 12.7.9, Table 12-7	Air quality effects during operation and decommissioning	<p>The rationale provided in the Scoping Report in relation to scoping these matters out is essentially the same as the rationale for scoping out the need for detailed assessment of air quality effects during construction, i.e. that given the nature of the Proposed Development the screening criteria provided in Table 12-7 will not be met/exceeded.</p> <p>The Inspectorate has considered the information provided, and accepts this approach, however, advises that a periodic review is made as further information becomes available about the Proposed Development and in response to the outcomes of</p>	<p>The Planning Inspectorate agrees that an assessment of air quality effects during operation and decommissioning can be scoped out. This approach has been reviewed as more information has become</p>

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments	Applicant's response
			<p>consultation with stakeholders. The ES should include account of the approach taken, including all relevant supporting evidence of the absence of a pathway(s) for likely significant effects to occur.</p>	<p>available and remains valid.</p> <p><i>ES Volume II Chapter 14 Air Quality (Application Document 6.2.14) has provided details on the approach taken, including all relevant supporting evidence of the presence or absence of a pathway(s) for likely significant effects to occur.</i></p>

ID	Ref	Description	Inspectorate's comments	Applicant's response
3.7.3	Paragraph 12.3.5, 12.7.8	Sensitive ecological receptors	<p>Paragraph 12.6.5 of the Scoping Report states that there are no sensitive statutory ecological receptors within 50m of the scoping boundary, however this does not accord with Figure 12-1 which indicates that the scoping boundary at the coast lies within some of the designated sites depicted. This must be clarified in the ES and if necessary, the relevant air quality information (as identified in the Scoping Report should be applied to an assessment of effects on ecological receptors (see Table 3.1 above).</p>	<p>This has been reviewed and corrected within <i>ES Volume II Chapter 14 Air Quality (Application Document 6.2.14)</i>. An assessment of the effects on ecological receptors has also been included.</p>

Table 10: Noise and Vibration

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments	Applicant's response
3.8.1	Paragraph 13.3.7	Ambient vibration monitoring	Given the nature of the scoping area and the information provided in the Scoping Report regarding likely vibration impacts, the Inspectorate agrees with the proposed approach to assess construction vibration on absolute levels.	Construction vibration effects have been considered in Table 13-13 of <i>Volume II Chapter 13 Noise and Vibration (Application Document 6.2.13)</i> .
3.8.2	Paragraph 13.4.5, Table 13-1	Noise impacts from operational road traffic	The Inspectorate has considered the information provided and accepts that significant effects are unlikely given the likely scale of operational traffic, however limited information on noise sensitive receptors that could be affected is provided in the Scoping Report. The Inspectorate advises that the ES should include the information on noise sensitive receptors used to establish that likely significant effects can be excluded and demonstrate where this has been informed by the outcomes of consultation with stakeholders.	The identified noise-sensitive receptors are summarised in Table 13-11 of <i>Volume II Chapter 13 Noise and Vibration (Application Document 6.2.13)</i> and shown in Figure 13-1 of the ES.
3.8.3	Paragraph 13.4.8, Paragraph 13.5.5, Table 13-1	Vibration impacts from operational activities	In the absence of information on the likely vibration generated by operational activities, in particular the operation of equipment at Immingham, the offshore tie-in and outlet, and shutdown valves associated with the Proposed Development, the Inspectorate is not in a	The nearest sensitive receptor to operational facilities is 120 m away. At this distance, it is unlikely that operational vibration would be perceptible. Consequently, potential operational vibration would not result in likely significant effects and therefore an assessment has been scoped out.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments	Applicant's response
			<p>position to agree to scope operational vibration from the assessment.</p> <p>Accordingly, the ES should include an assessment, or provide the relevant information, supported by advice from the relevant consultation bodies, to establish the absence of likely significant effects.</p>	
3.8.4	Paragraph 13.5.4, Table 13-1	Operational noise from the new pipeline	The Inspectorate has considered the information provided and agrees that significant effects are unlikely and that this matter can be scoped out of the ES.	<p>The new pipeline itself would be installed below ground and would not produce any operational noise emissions that would be perceptible at ground level.</p> <p>Consequently, an assessment of operational noise associated with the pipeline has been scoped out of the assessment and it is noted that this has been agreed with the Planning Inspectorate.</p>

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments	Applicant's response
3.8.5	Paragraph 13.3.2	Noise monitoring	<p>The Scoping Report describes the intention to undertake long-term unattended measurements at the Pipeline Offtake Facility at Immingham, the offshore pipeline tie-in and outlet at the former TCT Site and at selected shutdown valves along the pipeline. Short-term unattended measurements are proposed at selected locations along the pipeline route.</p> <p>The ES should contain detailed monitoring reports providing the data required by BS7445-1:2003.</p>	<p>In <i>Volume II Chapter 13 Noise and Vibration (Application Document 6.2.13)</i>, section 13.5.8 provisionally describes the noise monitoring methodology. This methodology has been consulted on as per information in Table 13-7 of <i>Volume II Chapter 13 Noise and Vibration (Application Document 6.2.13)</i>.</p>

Table 11: Traffic and Transport

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments	Applicant's response
3.9.1	Paragraph 14.7.3, Table 14-4	Impacts from operational traffic (including traffic and transport effects, severance, pedestrian delay, pedestrian amenity, fear and intimidation, and accidents and safety)	<p>The Inspectorate has considered the information provided, and accepts that significant effects are unlikely given the likely scale of operational traffic.</p> <p>The Inspectorate advises that the ES should include the information used to establish that likely significant effects can be excluded and demonstrate where this has been informed by the outcomes of consultation with stakeholders.</p>	<p>No assessment of the operational traffic has been included because the predicted operational workforce is limited to inspection and periodic maintenance work, and therefore the impact on the local road network will be negligible. The operational activities are described in <i>ES Volume II Chapter 3 Description of the Proposed Development (Application Document 6.2.3)</i>.</p>

ID	Ref	Description	Inspectorate's comments	Applicant's response
3.9.2	Paragraph 14.4.14	Base traffic flows growth	<p>The Scoping Report states that base traffic flows will be 'growthed' to the identified peak year of construction using adjusted model growth factors. It is not explained how traffic changes in the study area due to other development during the construction period will be accounted for. This should be explained in the ES.</p>	<p>Other development proposed during the construction period have been assessed as part of the cumulative effects assessment and reported in section 12.21 Error! Reference source not found. of <i>ES Volume II Chapter 12 Traffic and Transport (Application Document 6.2.12)</i>.</p>

ID	Ref	Description	Inspectorate's comments	Applicant's response
3.9.3	Paragraph 14.2.7, Paragraph 14.4.12	Traffic generation at compounds and construction staff sites	The Scoping Report describes the use of a gravity model to determine construction worker trip generation and the distribution of construction traffic onto the local highway network to calculate resultant effects. Limited information is provided on the methods applied or likely assumptions to be made as part of these calculations. This information should be provided in the ES, and evidence provided demonstrating how the outcomes of consultation with the relevant stakeholders has been taken into account.	As set out in <i>ES Volume II Chapter 12 Traffic and Transport (Application Document 6.2.12)</i> , the distribution for construction workers has been based upon the assumption that they will be centred around the main conurbations of Cleethorpes, Mablethorpe and Louth. The distribution has then been based upon a simple gravity model using the population of that area and the distance to the working area.
3.9.4	Paragraph 14.4.11	Duration of effects	The Inspectorate advises that the duration of effects are defined in the ES in addition to their description as permanent or temporary effects, given the likely extensive timescales of 'temporary' construction effects. If terms such as 'short-term' or 'long-term' are used the duration of these should be defined.	The duration of effects is discussed in section 12.4.25 to 12.4.27 of <i>ES Volume II Chapter 12 Traffic and Transport (Application Document 6.2.12)</i> .
3.9.5	Paragraph 14.4.15	Transport assessment	It will be essential that the key information from the Transport Assessment on which the assessments in the ES rely is clearly described in the ES, and that the assumptions made with regard to the worst-case scenario applied in each case are set out.	Further information regarding the Transport Assessment is provided in section 12.4.13 of <i>ES Volume II Chapter 12 Traffic and Transport (Application Document 6.2.12)</i> . The assessment scenarios are set out in section 12.4 of <i>ES Volume II Chapter 12 Traffic</i>

ID	Ref	Description	Inspectorate's comments	Applicant's response
				<p><i>and Transport (Application Document 6.2.12).</i></p> <p>The assessment is considered to be a worst case as no allowance for car sharing amongst construction workers has been allowed for, as well as uplifting the construction traffic data supplied by 20%.</p>

Table 12: Socio-economics

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments	Applicant's response
3.10.1	Paragraphs 15.5.11 and 15.5.12 Table 15-2	Socio-economic effects on employment, economic growth and training during operation	<p>The Scoping Report states that the potential for the creation of training opportunities is considered to be limited based on the scale of the operational employment generated as a result of the Proposed Development. Therefore, all effects on employment, economic growth and training during operation of the Proposed Development have been scoped out of the ES.</p> <p>The Inspectorate is content for these matters to be scoped out of the ES as the operation of the Proposed Development is unlikely to result in significant effects on employment, economic growth and training.</p>	Noted - no response required.
3.10.2	Paragraph 15.5.13 Table 15-2	Socio-economic effects on recreational routes and Public Rights of Way (PRoWs) during operation	<p>The Scoping Report states that operation of the pipeline and associated above ground infrastructure would not lead to any potential impacts in terms of PRoWs, National Cycle Network (NCN) or other recreational routes.</p> <p>The Inspectorate is content with this approach. However, the ES should include an assessment of the potential operational effects as a result of permanently redirecting any recreational routes of PRoWs during the construction phase of the Proposed Development, where significant effects could occur.</p>	No recreational routes or PRoWs will be permanently redirected during the construction phase of the Proposed Development. Any temporary diversions will be reinstated to their original route on completion of the relevant construction works.
3.10.3	Paragraph 15.5.14 and 15.5.16 Table 15-2	Socio-economic effects on 'community severance' and	The Scoping Report states that impacts to community severance and development land during construction	This is noted.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments	Applicant's response
		'development land' during operation	of the Proposed Development would not be anticipated to extend into the operational phase. Therefore, effects on community severance and development land have been scoped out of the ES.	
3.10.4	Paragraph 15.5.15 Table 15-2	Effects on private assets during operation of the pipeline	The Applicant intends to scope out effects on private assets during operation of the pipeline as it would be buried and would have no effect on private assets. The Inspectorate is content for this matter to be scoped out of the ES as the operation of the pipeline is unlikely to result in significant effects on private assets.	This is noted.

ID	Ref	Description	Inspectorate's comments	Applicant's response
3.10.5	Table 15-2	Decommissioning effects	The effects of decommissioning of the Proposed Development have not been considered for recreational routes and PRowS, community severance, private assets or development land. It is noted that the specific decommissioning methodology is not known at this stage. However, in the absence of more detailed information relating to the decommissioning phase of the Proposed Development, the Inspectorate is not in a position to agree to scope these matters from the assessment. Therefore, the ES should include an assessment of decommissioning effects on socio-economic elements or provide information to identify or demonstrate the absence of any likely significant effects.	Socio-economic effects on employment, economic growth and training, recreational routes and PRowS, community severance, and private assets during the decommissioning phase have been assessed within section 16.7 of <i>ES Volume II Chapter 16 Socio-economics (Application Document 6.2.16)</i> . Decommissioning effects on development land (allocations of land for future housing and employment development, as set out within local planning policy, and other existing and/or approved

ID	Ref	Description	Inspectorate's comments	Applicant's response
				<p>developments derived from the shortlist of cumulative schemes) have been scoped out as it is not possible to identify what extant development land would be available during the decommissioning phase. The Proposed Development has a minimum operational life of 25 years, with the potential to be extended further. Therefore, the current Local Plan periods for each of the local authorities in which the Proposed Development is located will have expired: North East Lincolnshire (2023), North Lincolnshire (2038), East Lindsey (2031) and West Lindsey/Central Lincolnshire (2040). It is also highly likely at the point of decommissioning that developments currently with permission will have been constructed, or permission expired.</p>

Table 13: Health and Wellbeing

ID	Ref	Description	Inspectorate's comments	Applicant's response
3.11.2	N/A	Assessment of effects - methodology	The Applicant should make effort to agree the approach to the assessment of human health effects with the relevant stakeholders, in particular the UK Health Security Agency and local public health teams, to ensure it is appropriate to the construction, operation and decommissioning of the Proposed Development.	Agreement has been sought with the relevant stakeholders and this is detailed within Section 17.3 of <i>Volume II Chapter 17 Health and Wellbeing (Application Document 6.2.17)</i> .
3.11.3	N/A	Public Right of Way (PRoW) - health impacts	The ES should consider the potential health impacts caused by the permanent loss or change to formal PRoWs and accessible open space as a result of the construction, operation and decommissioning of the Proposed Development.	This has been noted and has been assessed in <i>Section 17.7 of Volume II Chapter 17 Health and Wellbeing (Application Document 6.2.17)</i> .

Table 14: Materials and Waste

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments	Applicant's response
3.12.1	Paragraph 17.3.12 / Table 17-16	<p>Changes and direct impacts to safeguarded mineral sites</p> <p>Changes and direct impacts to safeguarded allocated waste sites</p>	<p>Paragraph 17.2.14 states that the Scoping Boundary does not pass through any other Mineral Safeguarding Areas (MSAs), however Chapter 9, Paragraph 9.2.10 states that no information is available for Lincolnshire County Council (LCC), and Table 17-16 states that the Proposed Development passes through an MSA. In its scoping response, LCC has indicated that this information is available and that this can be supplied to the Applicant.</p> <p>Additionally, in its scoping response, the Environment Agency have identified several waste sites in the surrounding area which are not included within the Scoping Report and the Inspectorate highlights the need for the ES to identify whether these are safeguarded sites.</p> <p>It is also noted that the Lincolnshire Minerals and Waste Local Plan is currently being updated and will require consideration if published during the preparation of the ES.</p> <p>The Inspectorate therefore considers that the impacts on mineral safeguarding areas, and safeguarded allocated waste sites, should be assessed in the ES.</p>	<p>All relevant documents have been reviewed including the Lincolnshire Minerals and Waste Local Plan which includes Figure 1: Lincolnshire Mineral Safeguarding Areas (MSAs) Map. MSAs in proximity to the Draft Order Limits have been reviewed and information is included in <i>ES Volume II Chapter 18 Materials and Waste (Application Document 6.2.18)</i> in paragraphs 18.5.18 and 18.5.20.</p> <p>Allocated/safeguarded waste sites within the Draft Order Limits and 1.5km of the Draft Order Limits are described in paragraph 18.5.22 Error! Reference source not found. of <i>ES Volume II Chapter 18 Materials and Waste (Application Document 6.2.18)</i>. Other waste sites and applications within 1.5km of the Draft Order Limits have been reviewed included the Table 18-17 and Table 18-18 of <i>ES Volume II Chapter 18 Materials and Waste (Application Document 6.2.18)</i>. <i>ES Volume II Chapter 18</i></p>

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments	Applicant's response
				<p><i>Materials and Waste (Application Document 6.2.18).</i></p> <p>Policy and legislation considered for the materials and waste ES chapter is presented in Section 18.2. At the time of preparation of the ES the Lincolnshire Minerals and Waste Local Plan has not been adopted.</p> <p>The IEMA Guidance does not include assessment of impacts on MSAs in a materials and waste assessment, although MSA are identified in this chapter to provide context. MSAs are considered in the Planning Statement submitted with the DCO application (Application Document 7.1).</p>
3.12.2	Table 17-16	Aspects proposed to scope out: Changes in demand for materials during operation and decommissioning; Changes in available landfill capacity during operation and decommissioning;	The Inspectorate is in agreement that these matters can be scoped out of the ES as significant effects are unlikely to arise.	This is noted.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments	Applicant's response
		Waste arising from construction components during extraction/processing/manufacture		
3.12.3	Table 17-16	Other environmental effects from waste	The Inspectorate accepts that the effects referred to can be appropriately addressed in other aspect chapters e.g., Air Quality, and as such this topic is not required to be assessed within the material assets and waste chapter.	This is noted.

Table 15: Climate Change

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments	Applicant's response
3.13.1	Table 18-7 and Table 18-14	In Combination Climate change	The Inspectorate accepts the reasoning presented and agrees that an assessment of 'in combination climate change' as described in the Scoping Report (the combination of future climate conditions and the Proposed Development) can be scoped out of the ES.	Noted.
ID	Ref	Description	Inspectorate's comments	Applicant's response
3.13.2	Table 18-8	Parameters to scope into the climate change resilience review	The information provided within Table 18-8, in relation to the Proposed Development's vulnerability to climatological and meteorological events, should be reviewed alongside the information in Table 20-3 (Major Accidents and Disasters) to ensure consistency in the ES's approach where these matters overlap.	The Proposed Development's vulnerability to climatological and meteorological events has been reviewed alongside the Major Accidents and Disasters. Only wave surges have been scoped into the Major Accidents and Disasters under Natural Hazards - Climatological and Meteorological as the Proposed Development is located in an area at risk of tidal flooding.

Table 16: Cumulative Effects

ID	Ref	Description	Inspectorate's comments	Applicant's response
3.14.2	Paragraph 19.3.4	Zone of Influence	The Scoping Report does not explain the reasoning behind the application of a 250m zone of influence at this preliminary review stage, and it is not clear how this aligns with the other scoping zones of influence applied in the technical chapters of the Scoping Report. The zone of influence applied should be fully justified in the ES.	The zone of influence/Study Area to be used for the ES has been reviewed, taking into account comments received via the Scoping stage and Statutory Consultation. Further details are included in section Table 20-5 of <i>ES Volume II Chapter 20 Cumulative Effects (Application Document 6.2.20)</i> .
3.14.3	Paragraph 19.3.7	Long list of other development	The Inspectorate understands from the information provided that the long list will be updated and revised as consultation with stakeholders is undertaken and the ES is prepared. The ES should identify a 'cut-off' date with respect to this process so that the currency of it can be understood.	The identification of a cut-off date for the long list considered within the assessment is provided in section 20.1.5 of <i>ES Volume II Chapter 20 Cumulative Effects (Application Document 6.2.20)</i> .
3.14.4	Paragraph 19.4.2	Interaction with wider V Net Zero Transportation and System	The 'bridging document' should be submitted as part of the ES and will be an important document to ensure that the key findings are brought into the cumulative effects assessment where applicable, following the methodology for assessment described in the ES.	The Viking CCS Bridging Document (<i>Application Document 6.13</i>) has been prepared which provides an overview of the overall Viking CCS Project and how the onshore and offshore elements interact. This is based on the available information related to the Offshore Project, as of the cut-off date of 31 May 2023.

Table 17: Major Accidents and Disasters

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments	Applicant's response
3.15.1	Table 20-3	Landslides	The Inspectorate notes that Table 20-3 has the options for 'scoped in' and 'scoped out' both ticked. Referring to Appendix H, it is assumed for the purposes of this Opinion that landslides are to be scoped in.	This is noted. Landslides have been scoped into the major accidents and disasters assessment, refer to <i>ES Volume II Chapter 19 Major Accidents and Disasters</i> and <i>ES Volume IV Appendix 19.1 (Application Document 6.4.19.1)</i> .
3.15.2	Table 20-3	Other matters proposed to be scoped out: Earthquakes, volcanic activity; tsunamis; pluvial flooding; groundwater flooding; avalanches; cyclones/ hurricanes/ typhoons/ storms/ gales; thunderstorms; extreme temperatures; droughts; severe space weather; fog; wildfires; poor air quality; public demonstrations; widespread damage to societies and economies; the need for largescale humanitarian assistance.	Given the information provided the Inspectorate is in agreement that these matters can be scoped out of the ES as significant effects are unlikely.	No response required.

ID	Ref	Description	Inspectorate's comments	Applicant's response
3.15.3	Paragraph 20.2.22	Survey data	The Scoping Report indicates that the baseline will be established utilising existing datasets from other aspect chapters, rather than specific surveys, however Chapter 2 Section 2.14.1 refers to a fracture assessment, integrity assessment, and CO ₂ corrosion assessment. The Inspectorate considers that all available baseline data including surveys (where relevant to the Proposed Development) should be used to inform the assessment of major accidents and disasters.	These assessments were undertaken to determine the suitability of the existing LOGGS pipeline for continued use as part of the Proposed Development and wider Viking CCS Project.

1.3 Anglian Water

Table 18: Anglian Water

Anglian Water Comment	Applicant's Response
V-Net Zero Pipeline - EIA Scoping Report consultation	
<p>We agree with principles of early engagement set out in 5.1.4. Anglian Water is not listed as one of stakeholders who has been engaged by the project to date (5.3.2). We note (5.5.2) that non statutory consultation is ongoing. We would consider that Anglian Water is correctly included on the list of consultees in 11.4.10.</p>	<p>The Applicant has since engaged with Anglian Water and is developing DCO Protective Provisions with them. Details of the meetings held with Anglian Water are detailed in Table 8-7 of the <i>Consultation Report (Application Document 5.1)</i>.</p>
Engagement, the draft DCO Order and assisting the applicant	
<p>Anglian Water would welcome the instigation of discussions with Chrysaor Production (U.K) Limited as the prospective applicant prior to the project layout and initial design fix for the onshore infrastructure and to assist the applicant before the assessment of the project. Experience has shown that engagement and agreement is required between NSIP applicants and statutory undertakers well before submission of the draft DCO for examination. The intention to consult at the statutory consultation stage (5.5.2) would appear to be too late to inform design and may result in delays to the project. We would recommend discussion on the following issues:</p>	<p>The Applicant has since engaged with Anglian Water and has developed DCO Protective Provisions. Details of the meetings held with Anglian Water are detailed in Table 8-7 of the <i>Consultation Report (Application Document 5.1)</i>.</p>
<p>1) The Draft DCO Order including protective provisions specifically to ensure Anglian Water's services are maintained for customers during construction</p>	
<p>2) Requirement for potable and raw water supplies including for testing (2.15.24)</p>	
<p>3) Requirement for wastewater services</p>	
<p>4) Impact of development on Anglian Water's assets including water abstraction and the need for mitigation</p>	

Anglian Water Comment	Applicant's Response
<p>5) Pre-construction surveys</p>	
<p>We do not agree (11.8.10) that foul drainage and water supplies should be scoped out of the Assessment. The potential impact on water supplies and waste water infrastructure and services during construction or from maintenance works can be significant. Approach investigations, assessment and design amendments early in pre-application can remove this risk. Early and meaningful engagement can also reduce the number of issues required to be considered by the Examining Authority and other parties and so speed up the Examination process for all parties.</p>	<p>These were initially scoped out as the risk from foul drainage / potable supply may be very low if there are few permanent staff on site in the long term. However, this has been scoped back into the chapter to ensure that the foul drainage / water demand will not result in any significant effects to surface water features or resources. The supply/demand has been identified and is addressed within <i>ES Volume II Chapter 11 Water Environment (Application Document 6.2.11)</i>, following stakeholder engagement with Anglian water. <i>ES Volume II Chapter 11 Water Environment (Application Document 6.2.11)</i> includes an assessment of whether this results in any significant effects in Section 11.7.</p>
<p>Anglian Water works to support the construction and operation of national infrastructure projects are conducted in accordance with the Water Industry Act 1991. We would expect that the Environmental Statement would include reference to existing water supply and water recycling infrastructure managed by Anglian Water and the provision of replacement infrastructure and the requirements for new infrastructure. Maps of Anglian Water's assets are available to view at the following address: http://www.digdat.co.uk/</p>	<p>It proposed to use established supplies, potentially including Anglian Water, further details are provided in Section 11.6 and 11.7 of <i>ES Volume II Chapter 11 Water Environment (Application Document 6.2.11)</i>. No new abstraction licence(s) are proposed for water supply for the Proposed Development. Consultation with Anglian Water and other licence holders is ongoing.</p>
<p>There are multiple existing Anglian Water assets including water mains within the site and water and wastewater infrastructure including water abstraction sites, water mains, rising mains and sewer pumping stations within or near the site or within roads which serve the site and the surrounding communities including Immingham, Grimsby, Louth and Mablethorpe and villages from Laceby to Manby. Anglian Water works with developers including those constructing projects under the 2008 Planning Act to ensure requests for alteration of sewers, wastewater and water supply infrastructure is planned to be undertaken with the minimum of disruption to the project and customers. We support the inclusion</p>	<p>The Applicant has since engaged with Anglian Water and has developed DCO Protective Provisions. Details of the meetings held with Anglian Water are detailed in Table 8-7 of the <i>Consultation Report (Application Document 5.1)</i>.</p>

Anglian Water Comment	Applicant's Response
<p>of water (11.7.1) including water infrastructure in the Construction Environment Management Plan and Water Management Plan. The CEMP and WMP should include steps to remove the risk of damage to Anglian Water assets from plant and machinery including haul roads (11.6.4) Further advice on minimising and then relocating Anglian Water existing assets can be obtained from connections@anglianwater.co.uk</p>	
<p>At page 136, 9.5.2 the report refers to groundwater and disturbance and pathways to sensitive surface and groundwater receptors including aquifers and abstractions. Anglian Water requests that where investigation work (9.5.7) identify risks through surface water and groundwater to water sources including abstractions that we are included in design and mitigation discussions with the Environment Agency. The report advises (9.7.2) that there are a number of Source Protection Zones within the site. We note that the summary (9.7.3) advises that during construction there are potential limited effects on human health and infrastructure.</p>	<p>A preliminary hydrogeological risk assessment has been undertaken with the risk ratings for SPZ 1 and 2s being classified as 'low'. Appropriate mitigation measures are identified and included where necessary. This will be reviewed further based on the findings of future geotechnical ground investigation work (date to be confirmed) and both Anglian Water and the EA will be consulted, as well as private landowners with private water abstractions where applicable. The requirement for a geotechnical ground investigation will be included as a commitment within the Draft CEMP (ES Volume II: Appendix 3.1).</p>
<p>Chapter 11 of the report considers Water Environment. We consider that in advance of the further investigation work referred to above the buffer zones (11.2.3 and 11.2.4) are appropriate. The exception to this is Covenham reservoir and Water Treatment Works operated by Anglian Water. The project should consider the potential impacts on Covenham with Anglian Water as well as with the Environment Agency (11.2.30)</p>	<p>Covenham Reservoir has been considered within this impact assessment as a potential receptor (Section 11.5 of <i>Volume II Chapter 11 Water Environment (Application Document 6.2.11)</i>).</p>
<p>To minimise the carbon cost of the project the design and construction of the project should minimise and if possible, avoid the need to move the water supply and water recycling network. If this is not possible then Protective Provisions will be required to protect the supply of water and management of wastewater for local communities by Anglian Water.</p>	<p>There are Anglian Water assets that intersect with the DCO Site Boundary. These assets would be crossed in a method that will be agreed with Anglian Water. It is not thought at this time that the Proposed Development would require the water supply or recycling network to be relocated. Protective Provisions are included in the <i>Draft DCO (Application Document 2.1)</i>.</p>

Anglian Water Comment	Applicant's Response
<p>We note that at the FRA (11.5.11) will consider risks of flooding including from sewers. Anglian Water supports the use of SuDS (11.7.10) to manage surface water runoff. Foul drainage is referred to 11.8.10 and with reference to 11.8.6 Anglian Water requests that the project confirms that all surface water will be managed using SuDS and not connected to the public sewer. That clarification by the project should include that no connection is required to the public sewer network for construction including site compounds and welfare facilities (2.15.11)</p>	<p>The <i>Drainage Strategy (ES Volume IV Appendix 11.3 (Application Document 6.4.11.3))</i> confirms that a desktop study was undertaken by GroundSure to gather available information regarding drainage and sewerage infrastructure in the vicinity of the DCO Site Boundary. The study identifies that that there is no known drainage and sewerage infrastructure present, therefore the DCO Site Boundary are not considered to be at risk from drainage or sewerage infrastructure.</p> <p>Drainage and Sewerage Infrastructure has not been considered further in the FRA.</p>
<p>Anglian Water recommends that the Environmental Statement should include reference to identified impacts on water supply, the sewerage network and sewage treatment both during construction and operation. The applicant proposes to source potable water from Anglian Water, and we would welcome engagement of= n connection and network options including the minimisation of embedded (capital) carbon in that infrastructure. Further advice on water and wastewater capacity and options – should they be required - can be obtained by contacting Anglian Water's Pre-Development Team planningliasion@anglianwater.co.uk).</p>	<p>These were initially scoped out as the risk from foul drainage / potable supply may be very low if there are few permanent staff on site in the long term. However, this has been scoped back into the chapter to ensure that the foul drainage / water demand will not result in any significant effects to surface water features or resources. The supply/demand has been identified and is addressed within <i>ES Volume II Chapter 11 Water Environment (Application Document 6.2.11)</i>, following stakeholder engagement with Anglian water. <i>ES Volume II Chapter 11 Water Environment (Application Document 6.2.11)</i> includes an assessment of whether this results in any significant effects in Section 11.7.</p> <p>The Applicant has since engaged with Anglian Water and has developed DCO Protective Provisions. Details of the meetings held with Anglian Water are detailed in Table 8-7 of the <i>Consultation Report (Application Document 5.1)</i>.</p>

1.4 Boston Borough Council

Table 19: Boston Borough Council

Boston Borough Council Comment	Applicant's Response
No comments to make.	No response required.

1.5 The Coal Authority

Table 20: The Coal Authority

The Coal Authority Comment	Applicant's Response
<p>The project site lies outside the coalfield area and therefore we have no specific comment or observations to make.</p> <p>In the spirit of efficiency of resources and proportionality, it will not be necessary for you to consult the Coal Authority at any future stages of the Project. This email can be used as evidence for the legal and procedural consultation requirements if considered necessary.</p>	<p>This is noted. No response required.</p>

1.6 East Lindsey District Council

Table 21: East Lindsey District Council

East Lindsey District Council Comment	Applicant's Response
<p>It is considered that the Environment Impact Assessment – Scoping Report, in general, identifies an acceptable scope for the Environmental Statement.</p> <p>The list below sets out general comments and constraints that it would be advisable for the EIA to address:</p>	<p>This is noted. No response required.</p>
<ul style="list-style-type: none"> Assess the location and potential impact on the District's aquifers and private borehole water supplies. 	<p>Information was received on 28 June 2023 and has been included in <i>Volume II Chapter 9 Geology and Hydrology (Application Document 6.2.9)</i>.</p>
<ul style="list-style-type: none"> Impacts on Tourism including on seasonal traffic. 	<p>Impacts on tourism have been assessed in section 16.7 of <i>ES Volume II Chapter 16 Socio-economics (Application Document 6.2.16)</i>. Impacts on seasonal traffic have been assessed in <i>ES Volume II Chapter 12: Traffic and Transport (Application Document 6.2.12)</i>.</p>
<ul style="list-style-type: none"> Compound and Construction traffic management – impacts on travel and congestion on the highway network, impacts on the highway surfaces from increased usage, visual and residential impacts of compounds and any other structures/development/plant/machinery etc 	<p><i>ES Volume II Chapter 12 Traffic and Transport (Application Document 6.2.12)</i> includes an assessment of the impacts on travel, including driver delays. It does not include an assessment of impacts on highways surfaces, as this is not within the scope of the EIA.</p> <p>The temporary visual impacts of the construction compounds have been assessed within Section 7.8 Potential Impacts and Assessment of Effects within <i>ES Volume II Chapter 7 Landscape and Visual (Application Document 6.2.7)</i>.</p>
<ul style="list-style-type: none"> Ensuring a robust and comprehensive consultation exercise is carried out that includes non-statutory consultees and local interest groups. 5) Please note that Strategic Polices 10 and 22 of the East Lindsey Local Plan are also relevant for 3.4.15 	<p>Refer to <i>ES Volume II Chapter 4 Consultation (Application Document 6.2.4)</i> for more information on the consultation undertaken for the EIA. Additionally refer to ES Volume II Chapters 6 to 18 for more information on specific consultation undertaken for technical chapters.</p>

East Lindsey District Council Comment	Applicant's Response
<ul style="list-style-type: none"> Section 11, please note Lincolnshire County Council are the Lead Flood Authority for East Lindsey. 	<p>This is noted.</p>
<ul style="list-style-type: none"> In Section 15 Socio-Economics several school in East Lindsey are listed, please note Tennyson High School in Mablethorpe has closed and has been demolished although there is a private school adjacent (Springwell Alternative Academy). Also there are primary schools in Fulstow, North Thoresby, Grimoldby, North Cockerington and Theddlethorpe. 	<p>This has been noted. The schools which fall within the community facilities study area of 1km from the DCO Site Boundary have been identified and presented in Section 16.5 of <i>ES Volume II Chapter 16 Socio-economics (Application Document 6.2.16)</i>. It should be noted that Springwell Alternative Academy, and the primary schools in Fulstow, North Thoresby, and Grimoldby fall outside of the study area. North Cockerington Church of England Primary School in North Cockerington and Theddlethorpe Academy in Theddlethorpe are identified in Section 16.5, as they fall within the applicable study area.</p>
<ul style="list-style-type: none"> In table 8.1 in Section 8 - Historic Environment all designated heritage assets should be considered of high value to avoid double counting when considering the significance of effects. 	<p>Designated heritage assets with multiple designations, such as scheduled monuments including listed structures, are considered in the baseline (section 8.5 of this ES chapter) as single designated heritage assets of high value, in order to avoid double counting when considering the significance of effects.</p>
<ul style="list-style-type: none"> In Section 19 Cumulative Effects other projects to consider are the Radioactive Waste Management (REM) proposal with the entry site for a nuclear storage facility at TGT. The applicant is also advised to further consult with ELDC, LCC and National Grid on emerging energy proposals. 	<p>Although the former Theddlethorpe Gas Terminal (TGT) site has been identified as a candidate site for a Geological Disposal Facility, there are no formal planning applications or tangible information to consider in a cumulative effects assessment. It is also not certain that this development will proceed at Theddlethorpe.</p> <p>ELDC, LCC have been consulted on the Long List (refer to Table 20-4 in <i>ES Volume II Chapter 20 (Application Document 6.2.20)</i>).</p>

1.7 East Riding of Yorkshire Council

Table 22: East Riding of Yorkshire Council

East Riding of Yorkshire Council Comment	Applicant's Response
East Riding of Yorkshire Council note that the pipeline is on the southern side of the Humber Estuary in the administrative boundary of North East Lincolnshire and East Lindsey. East Riding of Yorkshire Council as no comments to make.	No response required.

1.8 Environment Agency

Table 23: Environment Agency

Environment Agency Comment	Applicant's Response
Chapter 6 Ecology & Biodiversity	
We have no comments to make on this chapter and defer to Natural England for advice on these topics.	Noted.
Chapter 9 Geology & Hydrogeology	
<p>Groundwater Quality & Resource Protection Table 9-4 Other Hydrogeological Classifications contains several errors, which need to be corrected as follows:</p> <ul style="list-style-type: none"> • Section A: SPZ1 reference to Aylesbury is incorrect – this should be Aylesby. • Section B: safeguard zone GWSGZ0283 is also present in this section. • Section C and D: SPZ 2 Outer Protection Zone represents Tetney and Fulstow, not North Thoresby. • Section D: Total Catchment SPZ – doesn't represent Covenham St Bartholomew but merged GW public water supply abstractions in the area. • Sections A-C: NVZ of relevance to hydrogeology is the groundwater NVZ not surface water – G80 (Lincs Chalk). This has not been referenced. 	Hydrogeological details have been updated within <i>ES Volume II Chapter 9 Geology and Hydrogeology (Application Document 6.2.9)</i> , relating to drinking water safeguarding zones, source protection zones and nitrate vulnerable zones.
Although protection designations have been identified in Table 9-4, there is no discussion as to how these will be used to target mitigation measures; we presume this will become more evident in the full EIA.	<i>ES Volume II Chapter 9 Geology and Hydrogeology (Application Document 6.2.9)</i> has considered targeted mitigation measures in relation to identified protection designations.
Section 9.5.8 states that more detailed hydrogeological risk assessments are to be undertaken for trenchless crossings or where dewatering is required. A dewatering scheme will be	<i>ES Volume II Chapter 9 Geology and Hydrogeology (Application Document 6.2.9)</i> considers hydrogeological risk assessments for trenchless crossings or where dewatering may be required that fall within

Environment Agency Comment	Applicant's Response
<p>developed prior to construction in consultation with the Environment Agency. We welcome the confirmation that we will be consulted on all hydrogeological risk assessments, as suggested, particularly for trenchless crossings; every care should be taken to avoid reaching the underlying principal chalk aquifer bedrock to mitigate against potential impacts and issues with water resources, for example artesian flow.</p>	<p>SPZ 1 and SPZ 2. The EA will be consulted prior to the commencement of construction as part of developing dewatering scheme. Information relating to the need to try and avoid reaching the underlying principal chalk aquifer bedrock has been shared with the design team and has been considered as part of the Proposed Developments design.</p>
<p>There is no reference made to the 'Environment Agency's approach to groundwater protection' or relevant Groundwater Protection Position Statements, in particular section C. We recommend that this guidance should be followed.</p>	<p><i>ES Volume II Chapter 9 Geology and Hydrogeology (Application Document 6.2.9)</i> has considered and made reference to the 'Environment Agency's approach to groundwater protection' or relevant Groundwater Protection Position Statements, in particular section C.</p>
<p>Land Affected by contamination There is little reference made to our Land Contamination: Technical Guidance. We recommend that this guidance should be followed. Reference should also be made to British Standards BS 5930:1999 A2:2010 code of practice for site investigations and BS10175:2011 A1: 2013 Investigation of potentially contaminated sites – code of practice.</p>	<p>The ES (and <i>Volume II Chapter 9 Geology and Hydrology (Application Document 6.2.9)</i>) has considered and made reference to the following documents: The EA's Land Contamination: Technical Guidance; British Standards BS 5930:1999 A2:2010 code of practice for site investigations; and BS10175:2011 A1: 2013 Investigation of potentially contaminated sites – code of practice.</p>
<p>We welcome the confirmation that we will be consulted prior to any remedial strategy being put into place.</p>	<p>A remediation strategy comprising an inspection and discovery strategy will be devised and discussed with the regulatory authorities (including relevant local authorities and the Environment Agency) if required, prior to any remedial works. Contaminated material that is considered to pose a risk would be remediated in line with the strategy or disposed of appropriately. This forms mitigation measures E2 within <i>ES Volume IV Appendix 3.1 Draft CEMP (Application Document 6.4.3.1)</i>. Protective provisions are being developed with the Environment Agency.</p>
<p>Several potentially contaminated sites have been identified, and there is the potential for heterogeneity in ground conditions. As such we would suggest that if, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the local planning authority) shall be carried out until the developer has submitted a remediation strategy (to the local planning authority) detailing how this unsuspected contamination shall be dealt with. We will ask for this to be made a Requirement within the Development Consent Order and to be a consultee to its discharge.</p>	

Environment Agency Comment	Applicant's Response
Chapter 11 Water Environment	
<p>Receptors or factors which need to be scoped in for consideration within Chapter 9 or 11 include:</p> <ul style="list-style-type: none"> • Groundwater resources – specifically licensed and deregulated supplies, data held by the Environment Agency, and private (unlicensed) water supplies registered with the local authorities. There is minimal reference to these and ensuring the development works do not interrupt any licenced water abstraction in the area is essential - they are key receptors; several private supplies appear to lie along the route itself. • Artesian conditions – there is the potential for artesian groundwater flow if bedrock is penetrated; this should be considered as a potential risk. • Unique groundwater features in the area – blow wells, chalk streams, springs. • Groundwater quality – identifying the baseline conditions and specific protection measures. 	<p><i>ES Volume II Chapter 9 Geology and Hydrogeology (Application Document 6.2.9)</i> has considered both licensed and private water supplies. A data request was submitted to the EA and the four relevant local authorities with North East Lincolnshire Council, East Lindsey District Council and West Lindsey District Council identifying private water supplies potentially within the vicinity of the Proposed Development. North Lincolnshire Council did not hold any records of private water supplies within 2km of the Proposed Development.</p> <p><i>ES Volume II Chapter 9 Geology and Hydrogeology (Application Document 6.2.9)</i> has considered the potential for artesian conditions and unique groundwater features in the area on the Project. Additionally, they are discussed further in the Preliminary Hydrogeological Risk Assessment (<i>ES Volume IV Appendix 9-3, Application Document 6.4.9.3</i>).</p>
<p>The Construction and Environmental Management Plan when produced will be key to protection of groundwater, and we look forwarding to reviewing this in due course.</p>	<p>The Draft CEMP is presented in <i>ES Volume IV Appendix 3.1 (Application Document 6.4.3.1)</i>.</p>
<p>Dewatering As identified throughout the document and in particular in section 11.7.4, dewatering operations may require abstraction licences unless an exemption applies. The developer should determine the need for an abstraction licence at an early stage. We advise early consideration be given to this, so that permitting timescales can be built into the development programme so as not to cause delays. The applicant is advised to contact the Environment Agency on 03708 506 506 for further advice and to discuss the issues likely to be raised.</p>	<p><i>ES Volume II Chapter 9 Geology and Hydrogeology (Application Document 6.2.9)</i> considers hydrogeological risk assessments for trenchless crossings or where dewatering may be required that fall within SPZ 1 and SPZ 2. The EA will be consulted prior to the commencement of construction as part of developing dewatering scheme. Information relating to the need to try and avoid reaching the underlying principal chalk aquifer bedrock has been shared with the design team and has been considered as part of the Proposed Developments design.</p> <p>Refer to additional mitigation measure E3 in Section 9.8 of <i>ES Volume II Chapter 9 Geology and Hydrogeology (Application Document 6.2.9)</i> and</p>

Environment Agency Comment	Applicant's Response
	<i>ES Volume IV Appendix 3.1 Draft CEMP (Application Document 6.4.3.1)</i>
<p>We recommend the developer should follow the Hydrological Impact Appraisal for dewatering abstractions guidance.</p>	<p>This is noted.</p>
<p>The proposed development may need:</p> <ul style="list-style-type: none"> • a groundwater investigation consent (section 32/3 of the Water Resources Act 1991) to construct and test pump; and • a full abstraction licence (Water Resources Act 1991) if the volume of groundwater abstracted is greater than 20 m³/day and abstraction will occur for longer than a period of six consecutive months. <p>Further guidance can be found at: https://www.gov.uk/guidance/water-managementabstract-or-impound-water#abstractions-that-need-a-licence.</p>	<p>This is noted. Other consents and licenses that will be required for the Proposed Development have been listed out within Application Document 7.2.</p>
<p>The requirement for an abstraction licence applies unless the activity is exempt under The Water Abstraction and Impounding (Exemptions) Regulations 2017, as follows:</p> <p>5. (1) The restriction on abstraction does not apply to an abstraction or series of abstractions of water carried out in the course of building or engineering works for the purpose of dewatering from a sump or excavation if—</p> <p>(a) the abstraction or series of abstractions are temporary and in any event carried out over a period of less than six consecutive months beginning with commencement of the first abstraction,</p> <p>(b) each abstraction does not cause or is not likely to cause damage to a conservation site or specific features in such a site,</p> <p>(c) each abstraction does not cause or is not likely to cause damage to protected species, and</p> <p>(d) either—</p> <p>(i) the water abstracted is immediately discharged to a soakaway, or</p>	<p><i>ES Volume II Chapter 11 Water Environment (Application Document 6.2.11)</i> assesses impacts relating to foul drainage and potable water supplies, is proposed to use established supplies, potentially including Anglian Water, further details are provided in Section 11.6 and 11.7. No new abstraction licence(s) are proposed for water supply for the Proposed Development. Consultation with Anglian Water and other licence holders is ongoing.</p>

Environment Agency Comment	Applicant's Response
<p>(ii) the volume of water abstracted is less than 100 cubic metres of water per day and there is no intervening use of that water before discharge (but see paragraph (2)).</p> <p>(2) Where the abstraction is undertaken within 500 metres of a conservation site or within 250 metres of a spring, well or borehole used to supply water for any lawful use, paragraph (1)(d)(ii) applies in respect of that abstraction as if the reference to 100 cubic metres of water per day were a reference to 50 cubic metres of water per day.</p> <p>If the total programme exceeds 6 months then an abstraction licence will be required.</p>	
<p>Water Quality Data The applicant maybe interested in using Open WIMS data, which provides data on water quality measurements. Samples are taken at sampling points around England and can be from coastal or estuarine waters, rivers, lakes, ponds, canals or groundwaters. They are taken for a number of purposes including compliance assessment against discharge permits, investigation of pollution incidents or environmental monitoring. The archive provides data on measurements and samples dating from 2000.</p>	<p>The Open WIMS dataset has been reviewed for water quality data, and data has been obtained from the EA following consultation. This information has informed the baseline of this chapter (Section 11.5) to inform the impact assessment and is considered sufficient for purpose.</p>
<p>Only complete samples, where all analyses have been completed, are included. Currently the dataset does not include all groundwater or third-party data. In addition, where measurement results are reported as text, we are currently unable to display the results due to size limitations. Examples where this may happen are for some location data at default sampling sites and gas chromatography mass spectroscopy or metals scans. These results are available on request. Data may also be subject to change after publication.</p>	
<p>Flood risk We support the approach outlined in paragraph 11.5.9 that a Flood Risk Assessment (FRA) will be undertaken to support</p>	

Environment Agency Comment	Applicant's Response
<p>the application, as sections of the project are within Flood Zone 3 'high probability' of flooding. The FRA should follow relevant guidance in national planning policy.</p>	<p>An FRA (<i>ES Volume IV: Appendix 11.5 (Application Document 6.4.11.5)</i>) has been developed that has undertaken an assessment of all sources of flooding to the site.</p>
<p>The FRA should consider all sources of flooding, which may include tidal, fluvial, ground water, drainage systems, reservoirs, canals and ordinary watercourses. The FRA should demonstrate that the proposal will be safe for the lifetime of the development, without increasing risk elsewhere and where possible reducing flood risk overall. The FRA should also provide evidence that appropriate mitigation measures including flood resilience techniques have been incorporated into the development.</p>	
<p>The FRA should identify the vulnerability classification of the proposal, the expected lifetime of the development and whether or not the site (or parts of the development) needs to remain operational in a flood event. Paragraph 11.5.12 indicates the project is likely to be defined as Essential Infrastructure. Therefore, we recommend that all critical infrastructures should be located above the flood depths expected for the 0.1% (1 in 1000) scenario including climate change, appropriate to the lifetime of development.</p>	
<p>The Environment Agency's fluvial data and tidal hazard mapping should be used to inform the FRA. Our hazard mapping shows the consequences should a breach or overtopping of the sea defences occur, including the likely flood depths, velocities and overall hazard that could impact the site over its lifetime.</p>	<p>The Environment Agency's Flood Map for Planning has been used to inform the identification of existing flood risk, including fluvial and tidal inundation extents.</p>
<p>Please note that 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:</p> <ul style="list-style-type: none"> • in, over, under or within 8 metres of a main river (16 metres if tidal) 	<p>Any relevant consents, including FRAPs, will be applied prior to construction taking place. Buffer zones are to be applied around all watercourses, except at watercourse crossings. The size of this zone will be dependent on the type, maturity and quality of the vegetation and habitats in the vicinity of the watercourse and could be up to 10 m in width</p>

Environment Agency Comment	Applicant's Response
<ul style="list-style-type: none"> • 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 riverbank, culvert, or flood defence structure (16 metres if tidal) if planning permission has not already been granted for the works. <p>For further guidance and advice please visit our website: https://www.gov.uk/guidance/flood-risk-activities-environmental-permits or contact our local Partnership and Strategic Overview team in Lincoln by email at PSO_coastal@environment-agency.gov.uk.</p>	<p>(see Section 11.6 of <i>Volume II Chapter 11 Water Environment (Application Document 6.2.11)</i>).</p> <p>In the case of main rivers this is over 8m from the top of the bank, batter, or toe of the flood defence or culvert surrounding the main river.</p>
<p>We support the proposal that non-intrusive drilling techniques will be used for main river crossings.</p>	<p>The crossing schedule has been updated following stakeholder consultation (see Table 11-5 of <i>Volume II Chapter 11 Water Environment (Application Document 6.2.11)</i>) to include non-intrusive drilling techniques for all main river crossings. Non-intrusive crossings have also been applied to many Ordinary Watercourses where there is an ecological or technical need identified. The crossing schedule is provided in (<i>ES Volume IV Appendix 3.2 Crossing Schedule (Application Document 6.4.3.2)</i>).</p>
Chapter 17 Materials & Waste	
<p>Waste and Resources Action Programme (WRAP): Paragraphs 17.2.12 and 13 discuss the material required and possible recycling rates for it based on WRAP. We have seen the installation of several long-distance pipelines /cables in this area over the last three years. None of these installations have had a particularly good plan regarding the recycling of the haul road material (which has been 'virgin' in all cases). Problems have</p>	<p>It is intended that the majority of haul roads will be directly onto the sub-soil, other than an apron behind the tarmacked bellmouth to the point where the track will be subsoil only. However, depending on ground conditions and weather conditions a geotextile membrane and stone surface and/or bog-mats may be used in selected areas to enable traffic movements. Management of large quantities of aggregates at the end of construction is not anticipated. The contractor will be required to produce a Site Waste Management Plan before the commencement of works as</p>

Environment Agency Comment	Applicant's Response
<p>included lack of forethought regarding environmental permits, contamination by geotextile material, waste sites not being able to receive the material as classified etc. We, therefore, strongly urge the applicant to ensure there is a good plan for the material recycling once the project is finished, and ideally large-scale use of recycled aggregate for haul roads and yards.</p>	<p>part of the Construction Environment Management Plan (CEMP) submitted for approval to the local planning authority under the development consent order (DCO). An Outline Site Waste Management Plan (OSWMP) is submitted with the DCO application (ES Volume IV - Appendix 18.1). Project targets for materials and waste including waste recovery and recycled content are outlined in Paragraph 18.8.10 of <i>ES Volume II Chapter 18 Materials and Waste (Application Document 6.2.18)</i>.</p>
<p>Safeguarded Waste Facilities Table 17-4 (under paragraph 17.2.17) lists just one Safeguarded Waste Facility. There are other facilities as follows:</p> <ul style="list-style-type: none"> • JA Young Plastics, site is less than 100m from the corridor (one access road runs through the corridor); • Donald Ward, two sites (one permitted and one exempt permit application currently under consideration), one is 100m from the corridor; • SAR Metals Recycling Ltd, 2 sites, one is 500m from the corridor; • SAR Recycling Ltd, approximately 1km from the corridor; • ENVA Battery Recycling Ltd, 1km from the corridor; • Clarkson's, approximately 1.5km from the corridor. 	<p>Only allocated/safeguarded sites were included in the scoping report. All waste sites within the Draft Order Limits are now included. Allocated/safeguarded waste sites within the Draft Order Limits and 1.5km of the Draft Order Limits are described in paragraph Error! Reference source not found. of <i>ES Volume II Chapter 18 Materials and Waste (Application Document 6.2)</i>. Other waste sites and applications within 1.5km of the Draft Order Limits have been reviewed included Table 18-17 and Table 18-18 of <i>ES Volume II Chapter 18 Materials and Waste (Application Document 6.2.18)</i>.</p>
<p>Historic Landfill Sites Paragraph 17.2.25 lists two historic landfills. We hold a record of two sites within the scoping boundary:</p> <ul style="list-style-type: none"> • Killingholme Refinery (TA1697416252 & TA1708716047) two sites - hazardous sludges from oil refining. <p>We also hold a record of three sites on the edge of the scoping boundary:</p> <ul style="list-style-type: none"> • Mill Lane, Immingham (TA1690215114) - industrial, commercial, and household waste; • South of West Haven Way (TA1746416549) - Industrial waste; 	<p>Information about Historic landfill sites has been reviewed and included in the ES as appropriate. "Os Field No 9000" is listed in the Environment Agency Historic Landfill Dataset and included in Table 18-20 of <i>ES Volume II Chapter 18 Materials and Waste (Application Document 6.2.18)</i>.</p> <p>Historic landfills within the Draft Order Limits are outlined in Paragraph 18.5.25 of Error! Reference source not found. <i>ES Volume II Chapter 18 Materials and Waste (Application Document 6.2.18)</i>. Historic landfills within 1 km of the Draft Order Limits are outlined in Table 18-20 of <i>ES</i></p>

Environment Agency Comment	Applicant's Response
<p>• Aylesby, Cleethorpes (TA2003206752) – non-hazardous waste arising from the construction industry, factory solids and demolition waste.</p> <p>However, we have been unable to find records relating to the site mentioned in paragraph 17.2.26 as “Os Field No 9000”. We strongly recommend that where possible the route should seek to avoid these landfill sites; where this would not be possible the applicant would need to consider remediation measures, alongside issues relating to landfill gas and contaminated ground.</p>	<p><i>Volume II Chapter 18 Materials and Waste (Application Document 6.2.18).</i></p> <p>Potential contamination from historic landfills is considered in <i>Chapter 9: Geology and Hydrogeology (Application Document 6.2.9)</i>.</p> <p>Two historic landfill sites fall within the boundaries of the Draft Order Limits. The first of which is over two distinct areas. This is referred to as “Conoco” (holder reference EAHLD01519 and EAHLD01518). Works within this historic landfill are not anticipated.</p> <p>“Aylesby” (EAHLD01582) lies south of Aylesby, adjacent to Barton Street. Works within the historic landfill are not anticipated and will be limited to the pathway located between the historic landfill and Barton Street.</p>
<p>Materials Management Plan</p> <p>Paragraph 17.4.5. States that a Materials Management Plan (MMP) will be developed under CL:AIRE Definition of Waste. For clarity, the MMP must be written before the Definition of Waste: Code of Practice (DoWCoP) is submitted. Planning is key before this (‘certainty of use’). The plan should include detailed contingencies, tracking systems and evidence of inspection.</p>	<p>The contractor will be required to produce a Materials Management Plan before the commencement of works as part of the CEMP submitted for approval to the local planning authority under the DCO. This is a commitment in the <i>Draft Construction Environmental Management Plan (CEMP) (Appendix 3.1 (Application Document 6.4.3.1))</i>.</p>
<p>Appendix G: A review of the Lincolnshire Minerals and Waste Local Plan is being undertaken and the applicant should ensure appropriate consideration is given to this, during the development of the project.</p>	<p>At this stage, a draft of the new Lincolnshire Minerals and Waste Local Plan is not yet available. All extant policy and legislation have been reviewed and is included in the ES.</p>
<p>Chapter 19 Cumulative Effects</p>	
<p>Table 19-1 identifies Hornsea Project Four Offshore Wind Farm as a development with the potential for inter-project impacts. The Hornsea Project Four development boundary lies entirely north of</p>	<p>This error had been noted and Hornsea Project Four Offshore Wind Farm has been removed from the Long List.</p>

Environment Agency Comment	Applicant's Response
<p>the Humber Estuary and the information under the 'approximate distance' column therefore appears incorrect.</p>	
<p>Chapter 20 Major Accidents and Disasters</p>	
<p>Major Accidents and Disasters We note the various elements and events that Table 20.3. scopes in or out. We note that animal diseases are currently scoped out, but we would mention that there are a large number of poultry houses along the pipeline route and further consideration should be given as to whether or not Avian Flu is an issue that should be scoped in?</p>	<p>Animal diseases has been scoped in (see Table 19-4 of <i>ES Volume II Chapter 19 Major Accidents and Disasters (Application Document 6.2.19)</i> and Avian Flu has been assessed, refer to <i>ES Volume IV Appendix 19.1 (Application Document 6.4.19.1)</i>.</p>
<p>Further pre-application consultation</p>	
<p>Should the applicant wish us to review any technical documents or want further advice to address the 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. As part of our charged for service we will provide a dedicated project manager to act as a single point of contact to help resolve any problems. We currently charge £100 per hour, plus VAT. The terms and conditions of our charged for service are available here.</p>	<p>This is noted.</p>

1.9 Historic England

Table 24: Historic England

Historic England Comment	Applicant's Response
<p>We note the iterative approach to investigations set out in the report and will look forwards to early sight of the results of</p>	<p>This is noted.</p>

Historic England Comment	Applicant's Response
<p>cartographic, geophysical survey, lidar and aerial photographic analysis 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.</p>	
<p>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 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 or areas of well preserved ridge and furrow reinstatement include the earthwork form rather than introducing a flattened strip.</p>	<p>The setting assessment presented in earthwork has applied the approach set out in out GPA3 Setting of Heritage Assets.</p>
<p>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</p>	<p>The significance / character / importance of assets on the pipeline routes is fully considered in the baseline assessment (<i>ES Volume IV Appendix 8-1 Cultural Heritage Desk-based Assessment</i>).</p>

Historic England Comment	Applicant's Response
<p>https://historicengland.org.uk/images-books/publications/deposit-modelling-and-archaeology/ and other publications.</p>	
<p>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.</p>	<p>The assessment of archaeological potential included in the baseline (<i>ES Volume IV Appendix 8-1 Cultural Heritage Desk-based Assessment</i>) has considered Research Objectives and agenda topics described in the Updated Research Agenda and Strategy for the East Midlands. These will also inform development of the archaeological mitigation strategy.</p>

1.10 Lincolnshire County Council

Table 25: Lincolnshire County Council

Lincolnshire County Council Comment	Applicant's Response
<p>The Scheme - the V Net Transportation and storage scheme comprises an onshore transportation system comprising a buried 53km 24" diameter onshore pipeline and shutdown valves with an offtake facility at Immingham. At the Theddlethorpe site there will be an on shore pipeline tie in and outlet facility</p>	<p>No response required</p>
<p>Welcome the approach to alternatives which should be set out in detail in the Environmental Statement so a clear justification for the route chosen is provided to give confidence and credibility that other options were considered before the preferred route was confirmed.</p>	<p>Refer to <i>ES Volume II Chapter 2 Design Evolution and Alternatives (Application Document 6.2.2)</i>.</p>
<p>Section 3 – Planning Policy Context – no comment to make</p>	<p>No response required</p>
<p>Section 4 – Approach to EIA – in relation to the section on consultation the Council is supportive of broad principles in respect of consultation, however it is key that public consultation is meaningful and wide ranging particular given the other potential significant infrastructure projects in the Theddlethorpe area.</p>	<p>Refer to the <i>ES Volume II Chapter 4 Consultation (Application Document 6.2.4)</i> and the <i>Consultation Report (Application Document 5.1)</i> for more detail on the public consultations held for the Proposed Development, including the Statutory Consultation.</p>

Lincolnshire County Council Comment	Applicant's Response
<p>Section 5 – Stakeholder engagement and consultation – as above in relation to EIA consultation the need to consult with Councillors and Parish Councils will also need to be a key aspect of the proposal.</p>	<p>Parish Councils have been consulted with as part of the Statutory Consultation, refer to the <i>Consultation Report (Application Document 5.1)</i>.</p>
<p>Section 6 - Ecology and Biodiversity – No Comment</p>	<p>No response required</p>
<p>Section 7 – Landscape and Visual Assessment - All viewpoints should be based on winter months though summer months can also be included.</p>	<p>Winter viewpoint photography has been undertaken and presented in the ES. Refer to <i>ES Volume IV Appendix 7.2 Representative Photo-view (Application Document 6.4.7.2)</i>.</p>
<p>Section 7 – Landscape and Visual Assessment - It should also be considered if any viewpoint montages should be with all landscape features removed to demonstrate the very worst potential impact on the visual character of the area.</p>	<p>Photomontages have been provided for the Block Valve Stations. They demonstrate Year 1 with vegetation removed during the construction phase, newly planted mitigation (without any growth) and at Year 15 of the Proposed Development, when mitigation planting will have established. Refer to <i>ES Volume IV Appendix 7.2: Representative Photo-view (Application Document 6.4.7.2)</i>.</p>
<p>Section 8 – Historic Environment - pleased that the construction and operational phases of the project are recognised as having the potential to result in permanent impacts to archaeological remains and heritage assets, and that the impact on archaeology and cultural heritage assets will be scoped into the EIA. Have some concerns regarding both the desk based and the field evaluation approaches as laid out in the scoping report.</p>	<p>This is noted.</p>
<p>Section 8 – Historic Environment - Regarding the initial study area of 1km (section 8.2.2), HER data for a 2km radius is required from the site boundary.</p>	<p>The impact assessment (section 8.7 of this ES chapter) has considered baseline data up to 500m from the Draft Order Limits. This is considered to provide a proportionate study area, given that within the Draft Order Limits the pipeline impact will be limited to 30m (and further reduced to 10m in highly sensitive areas). Sites beyond the 500m study area have also been considered in the impact assessment where these provide appropriate context and explanation for the heritage assets encountered within the 500m study area.</p>

Lincolnshire County Council Comment	Applicant's Response
<p>Section 8 – Historic Environment - Section 8.2.3 states that Heritage Gateway and the Heritage Explorer map for Lincolnshire have been used as data sources, this is not acceptable. The National Planning Policy Framework states that ‘As a minimum the relevant historic environment record should have been consulted’ (para 194). The websites clearly state they are unsuitable for planning: ‘It should be noted that the information provided through the Lincolnshire Heritage Explorer is only part of that held by the LHER, and will not be sufficient on its own to inform the planning process.’ Heritage Gateway states that ‘Please note that local HER records contain much more detailed information than is currently available here. Please contact the relevant authority direct for all planning matters or queries relating to their records.’</p>	<p>This is noted. The following data sources have been consulted during the preparation of ES Chapter 8 and the historic environment desk-based assessment (<i>ES Volume IV Appendix 8-1 (Application Document 6.4.8.1)</i>) to define the baseline conditions for heritage assets:</p> <p>The National Heritage List for England (NHLE); North Lincolnshire Council Historic Environment Record (HER); North East Lincolnshire Council HER; Lincolnshire County Council HER; the Archaeology Data Service, for information relating to heritage assets and previous fieldwork events; the National Mapping Programme; the Rapid Coastal Assessment Survey of the Inner Humber Estuary; local lists from all three relevant Local Planning Authorities covering locally listed heritage assets and Archaeological Consulting Areas; the British Geological Survey Geo-Index online resource; published and unpublished primary sources and archaeological reports; LiDAR open-source datasets from the Environment Agency; and aerial photographs from relevant archives and online repositories.</p> <p>Heritage Gateway has also been consulted for information relating to non-designated heritage assets.</p>
<p>Section 8 – Historic Environment - Regarding 8.4, guidance documents should include the Lincolnshire Archaeology Handbook (2022). This lays out the requirements for undertaking archaeological work in the County. Regarding desk-based sources full LiDAR coverage and assessment must be included, and Portable Antiquities Scheme (PAS) data must also be consulted for the study area.</p>	<p>The Lincolnshire County Council Archaeology Handbook is included in the guidance documents followed in compiling the desk-based assessment (<i>ES Volume IV, Appendix 8-1 (Application Document 6.4.8.1)</i>) and <i>ES Volume II Chapter 8 (Application Document 6.4)</i>. LiDAR analysis is included in <i>ES Volume IV, Appendix 8-2 (Application Document 6.4.8.2)</i>. Portable Antiquities Scheme (PAS) data was consulted as part of the desk-based assessment.</p>
<p>Section 8 – Historic Environment - Section 8.4.1 states that the DBA will ‘confirm whether any additional survey work is required to better determine the nature, extent and origin of buried archaeological remains, including deposits that may contain palaeo-environmental data, within the construction footprint of the project.’ The potential archaeological impact from all project</p>	<p>Potential archaeological impacts from all project impacts have been considered in the assessment. All areas within the DCO Site Boundary where potential archaeological impacts could arise, including the construction footprint of the Proposed Development and temporary site compounds, have been included in the site walkover survey undertaken to inform the desk-based assessment (<i>ES Volume IV, Appendix 8-1</i>),</p>

Lincolnshire County Council Comment	Applicant's Response
<p>impacts must be adequately investigated not just the construction footprint, for example the potential compression impacts from temporary site compounds.</p>	<p>aerial photograph assessment and LiDAR analysis (<i>ES Volume IV, Appendix 8-2</i>), and geophysical survey (<i>ES Volume IV, Appendix 8-3</i>). Compaction impacts from temporary site compounds are considered in section 8.7 of this ES, Potential Impacts and Assessment of Effects.</p>
<p>Section 8 – Historic Environment - Archaeological evaluation will be undertaken as part of the assessment process, details and intended scheduling of the survey work programme should be provided at the earliest opportunity and more specific information will be required going forward.</p>	<p>The scope of current geophysical surveys (<i>ES Volume IV, Appendix 8-3 (Application Document 6.4.8.3)</i>) has been agreed with the relevant local authority archaeologists at North Lincolnshire Council, North East Lincolnshire Council and Lincolnshire County Council. A WSI for archaeological evaluation is included at <i>ES Volume IV Appendix 8-3 (Application Document 6.4.8.3)</i>; this will also be agreed with the relevant local authority archaeologists.</p>
<p>Section 8 – Historic Environment - Appropriate assessments must be included as part of the ES. The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 states "The EIA must identify, describe and assess in an appropriate manner...the direct and indirect significant impacts of the proposed development on...material assets, cultural heritage and the landscape." (Regulation 5 (2d)).</p>	<p>The direct and indirect significant impacts of the proposed development on material assets, cultural heritage and the landscape have been fully assessed, refer to <i>ES Volume II</i>:</p> <ul style="list-style-type: none"> • <i>Chapter 18 Materials and Waste (Application Document 6.2.18)</i>; • <i>Chapter 8 Historic Environment (Application Document 6.2.8)</i>; • <i>Chapter 7 Landscape and Visual (Application Document 6.2.7)</i>.
<p>Section 8 – Historic Environment - Section 8.4.2 states that there will be a 1km study area for non-designated assets and a 2km study area 'sufficient for identifying heritage assets which may experience...changes to their setting.' Section 8.6.3 however states that 'a wider study area may be used to identify assets whose setting may change.' Heritage assets within the ZTV which may be affected by settings issues should be identified and a competent assessment of their significance undertaken to establish the potential impacts from the development and any proposed mitigation measures. All designated assets (ie. Scheduled Monuments and Listed Buildings) within a 5km radius should be taken into account for setting assessments. The significance of each asset must be assessed prior to scoping</p>	<p>The setting assessment in <i>ES Volume IV, Appendix 8-1 (Application Document 6.4.8.1)</i> has considered designated heritage assets up to 5km from the DCO Site Boundary where the settings of designated heritage assets of the highest significance (heritage value) (being scheduled monuments, Grade I and Grade II* listed buildings) may be impacted. No potential impacts on the settings of designated heritage assets beyond 2km were identified and therefore designated heritage assets between 2km and 5km were scoped out of the assessment.</p>

Lincolnshire County Council Comment	Applicant's Response
<p>which assets would be affected. Modelling should particularly include any identified assets which have the potential to be visible or have their setting affected by the taller elements of the development.</p>	
<p>Section 8 – Historic Environment - Section 8.4.4 again says desk-based research will include the Heritage Explorer map, this is unacceptable for reasons stated above.</p>	<p>This is noted. The following data sources have been consulted during the preparation of ES Chapter 8 and the historic environment desk-based assessment (<i>ES Volume IV Appendix 8-1 (Application Document 6.4.8.1)</i>) to define the baseline conditions for heritage assets:</p> <p>The National Heritage List for England (NHLE); North Lincolnshire Council Historic Environment Record (HER); North East Lincolnshire Council HER; Lincolnshire County Council HER; the Archaeology Data Service, for information relating to heritage assets and previous fieldwork events; the National Mapping Programme; the Rapid Coastal Assessment Survey of the Inner Humber Estuary; local lists from all three relevant Local Planning Authorities covering locally listed heritage assets and Archaeological Consulting Areas; the British Geological Survey Geo-Index online resource; published and unpublished primary sources and archaeological reports; LiDAR open-source datasets from the Environment Agency; and aerial photographs from relevant archives and online repositories.</p> <p>Heritage Gateway has also been consulted for information relating to non-designated heritage assets.</p>
<p>Section 8 – Historic Environment - Section 8.4.4 also states that 'additional data from geotechnical investigations carried out for the project to identify the presence of peat deposits and help assess palaeo-environmental potential.' The Historic England Regional Science Advisor should be consulted on the project as well as providing advice on geoarchaeological assessment prior to any ground investigation.</p>	<p>The Historic England Regional Science Advisor was introduced to the project at the Viking CCS Heritage Consultees meeting held on 19 April 2023. The Regional Science Advisor will be consulted on geoarchaeological and palaeo-environmental assessment prior to any ground investigation.</p>
<p>Section 8 – Historic Environment - Section 8.4.6 states that consultation will be carried out 'as necessary' with Historic</p>	<p>Consultation has been undertaken with key stakeholders with specific focus on the historic environment, including Historic England and the</p>

Lincolnshire County Council Comment	Applicant's Response
<p>Environment Advisors and Conservation Officers to the districts and county council. This consultation and engagement is necessary not just in preliminary stages but throughout the duration of the project to assist with expertise and advice, effective communication is essential in ensuring the project runs as smoothly as possible and potential issues are resolved quickly and effectively.</p>	<p>archaeological advisors to East Lindsey District Council, West Lindsey District Council, Lincolnshire County Council, North Lincolnshire Council and North East Lincolnshire Council. This has included statutory consultation on the scope of the EIA and on the PEIR for the Proposed Development, and additional consultation through an ongoing programme of monthly on-line meetings.</p> <p>Consultation with the relevant HERs commenced with a meeting on 16 May 2022.</p> <p>Consultation in respect of the Anglo-Saxon cemetery excavated on Welbeck Hill was undertaken with Dr Kevin Leahy of the Portable Antiquities Scheme and the North Lincolnshire Museum, Scunthorpe, following comment by a member of the public in response to the statutory consultation.</p>
<p>Section 8 – Historic Environment - Section 8.4.7 states 'archaeological trial trench evaluation (only if deemed appropriate) to confirm the results of the geophysical survey and to characterise the nature, extent and preservation level of archaeological remains in order to understand their heritage value.'</p>	<p>No response required.</p>
<p>Section 8 – Historic Environment - All the archaeology which would be impacted by the development will need to be appropriately dealt with whether it be locally, regionally or nationally significant. As the NPPF states 'Local planning authorities should require developers to record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) in a manner proportionate to their importance and the impact.' (para 205)</p>	<p>This is noted.</p>
<p>Section 8 – Historic Environment - Trenching will be required not only to confirm geophysical survey results as stated in 8.4.7 but as an evaluation process in itself to investigate blank areas and to obtain practical information regarding the depth and extent of</p>	<p>Following detailed geophysical (magnetometer) survey a programme of trial trenching is proposed (see <i>ES Volume IV, Appendix 8-4: WSI for Archaeological Evaluation</i>). The results of the trial trenching programme</p>

Lincolnshire County Council Comment	Applicant's Response
<p>surviving archaeological deposits which will be impacted by the development. A programme of trial trenching is required to inform a robust mitigation strategy which will need to be agreed by the time the Environmental Statement is produced and submitted with the Development Consent Order (DCO) application.</p>	<p>will inform the development of a detailed archaeological mitigation strategy.</p>
<p>Section 8 – Historic Environment - Section 8.4.7 states that geophysical survey will be undertaken 'within the footprint of the project' elsewhere there is reference to the 'full working width of the project'. (8.6.2) Geophysical survey will be required across the total extent of potential impact.</p>	<p>Detailed geophysical (magnetometer) surveys (<i>ES Volume IV, Appendix 8-3</i>) have been undertaken on accessible land suitable for survey across the full DCO Site Boundary.</p>
<p>Section 8 – Historic Environment - A geophysical survey must be undertaken of the main development site and all potential cable connector routes until they have been descoped. The results are required to identify site-specific archaeological potential and to inform a programme of archaeological trial trenching and subsequent mitigation. Pre-determination evaluation of the cable connection corridors can be very useful with informing a decision on the most cost effective and viable route.</p>	
<p>Section 8 – Historic Environment - Regarding the geophysical survey a single Written Scheme of Investigation should be prepared that all contractors adhere to. This must include appropriate quality and control measures to ensure consistency of data recovery across the site. The proposed cable route(s) must be included in the survey. Separate reports for each contractor should be supplied in full with an overarching report presenting the combined results as this will be the basis for the subsequent evaluation trenching.</p>	
<p>Section 8 – Historic Environment - Section 8.6.1 Identification of Potential Effects does not include potential compaction issues for the movement of construction plant or for the construction of compounds. Those areas which may be subject to compaction</p>	<p>Compaction impacts from temporary site compounds are considered in section 8.7 of <i>ES Volume II Chapter 8 Historic Environment (Application Document 6.2.8)</i>.</p>

Lincolnshire County Council Comment	Applicant's Response
<p>will need to be included as the full extent of the proposed development area should be included in the evaluation process. Archaeological impacts and subsequent mitigation have the potential for significant impacts so sufficient evaluation is essential in informing the selection process and in ensuring the subsequent design and work programme is devised with an understanding of the level of archaeological work which may be required before and during the construction phase.</p>	
<p>Section 8 – Historic Environment - Section 8.6.8 states that they wish to scope out decommissioning as the pipeline infrastructure would be left in situ once operation ceases. Details of future management and repairs which may involve ground disturbance should be provided along with any proposed mitigation to deal with potential archaeological impact. These should also be included in any management plan dealing with maintenance of the pipeline for its lifetime.</p>	<p><i>ES Volume II Chapter 8 Historic Environment (Application Document 6.2.8) considers decommissioning effects on heritage assets in section 8.7, Potential Impacts and Effects.</i></p>
<p>Section 8 – Historic Environment - Section 8.7.1 states that 'further Mitigation by Design will be built into the Project to minimise impact to heritage assets and their setting, as far as possible.' Trial trenching will be essential for this approach as results are essential for effective risk management and to inform programme scheduling and budget management. Failing to do so could lead to unnecessary destruction of heritage assets, potential programme delays and excessive cost increases that could otherwise be avoided.</p>	<p>This is noted.</p>
<p>Section 8 – Historic Environment - The EIA will need to contain sufficient information on the archaeological potential and must include evidential information on the depth, extent and significance of the archaeological deposits which will be impacted by the development. The results will inform a fit for purpose mitigation strategy which will identify what measures are to be</p>	<p><i>Refer to ES Volume II Chapter 8 Historic Environment (Application Document 6.2.8).</i></p>

Lincolnshire County Council Comment	Applicant's Response
<p>taken to minimise or record the impact of the proposal on archaeological remains.</p>	
<p>Section 8 – Historic Environment - The Environmental Impact Assessment (EIA) will require desk-based research, non-intrusive surveys, and intrusive field evaluation for the full extent of proposed impact. The results should be used to minimise the impact on the historic environment through informing the project design and an appropriate programme of archaeological mitigation. The provision of sufficient baseline information to identify and assess the impact on known and potential heritage assets is required by Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (Regulation 5 (2d)), National Planning Statement Policy EN1 (Section 5.8), and the National Planning Policy Framework</p>	<p>This is noted.</p>
<p>Section 9 – Geology and Hydrogeology – at paragraph 9.2.10 states that no mineral safeguarding information is available from the County Council. This is not the case and contact should be made with the County Council to obtain this information to ensure this issue has been addressed before the ES is produced.</p>	<p>This has been included within this ES, specifically within <i>Volume II Chapter 18: Materials and Waste (Application Document 6.2.18)</i>.</p>
<p>Section 10 – Agriculture and Soil – whilst it is noted that any impact on agricultural land will be temporary in nature but important that there is no long standing issues to agricultural land and supportive of the proposed approach.</p>	<p>It is noted that LCC are supportive of the proposed approach to the assessment of impacts to soils and agricultural land.</p>
<p>Section 11 – Water Environment - From a water environment perspective, the range of the topics in the scoping document appears reasonable, and we will be able to comment in further detail as the project progresses.</p>	<p>This response has been noted – no response required.</p>
<p>Section 12 – Air Quality – No comment</p>	<p>No response required.</p>
<p>Section 13 – Noise and Vibration – No comment</p>	<p>No response required.</p>

Lincolnshire County Council Comment	Applicant's Response
<p>Section 14 – Traffic and Transportation - From a highways perspective, the range of the topics in the scoping document appears reasonable, and we will be able to comment in further detail as the project progresses.</p>	<p>This response has been noted – no response required.</p>
<p>Section 15 – Socio-economic - From an economic growth perspective, the range of the topics in the scoping document appears reasonable, and we will be able to comment in further detail as the project progresses.</p>	<p>An assessment of the affected PRow, as identified within Section 16.5 of <i>ES Volume II Chapter 16 Socioeconomics (Application Document 6.2.16)</i>, has been undertaken within Section 16.7 <i>ES Volume II Chapter 16 Socioeconomics (Application Document 6.2.16)</i>, taking into account the temporary diversion strategy set out in the <i>Outline PRow Management Plan (Application Document 6.11)</i>.</p>
<p>Section 15 – Socio-economic - It is considered that Public Rights of Way and Access are adequately covered at this stage and that necessary temporary diversions will be treated sympathetically during construction. Await further detail of which routes will be affected but in the meantime are, on request, able to provide location details of both recorded rights of way and applications for additional routes within the selected corridor area as necessary. Detailed analysis of affected routes will follow once known.</p>	
<p>Section 16 – Health and Well Being – No comment</p>	<p>N/A</p>
<p>Section 17 – Materials and Waste – No comment</p>	<p>N/A</p>
<p>Section 18 – Climate Change – The proposed methodology for climate and biodiversity related assessment are sound.</p>	<p>This is noted.</p>
<p>Section 19 – Cumulative Impact – The suggested methodology is acceptable but would draw attention to the potential for another major infrastructure project in the Theddlethorpe area and therefore the local community sensitivity to this project should be considered carefully when undertaking community and stakeholder engagement in this area.</p>	<p>This is noted. Refer to the <i>Consultation Report (Application Document 5.1)</i> which details the approach undertaken to non-statutory and statutory consultations.</p>
<p>Section 20 – Major accidents and disasters – methodology proposed is sound as are those events to be scoped in or out. However, Table 20.3 shows landslides to be scoped in and out so clarification on this point is required.</p>	<p>This is noted. Landslides has been scoped into the major accidents and disasters assessment, refer to Table 19-4 in <i>ES Volume II Chapter 19 Major Accidents and Disasters (Application Document 6.2.19)</i> and <i>ES Volume IV Appendix 19.1 (Application Document 6.4.19.1)</i>.</p>

1.11 Mablethorpe and Sutton Town Council

Table 26: Mablethorpe and Sutton Town Council

Mablethorpe and Sutton Town Council Comment	Applicant's Response
<p>Should the proposal go ahead, it urges that all due care and consideration be given and taken with regard to preservation of flora, fauna and local wildlife along the planned route of the pipeline</p>	<p>Habitats were appraised for their potential to support protected and notable flora and fauna during the Phase 1 habitat survey. Further surveys have been conducted where appropriate, and recommendations for avoidance, mitigation and compensation will be provided (where appropriate) in line with relevant planning policy and guidance.</p>
<p>That the impact of any future proposed geological disposal facility at the same location be factored into any agreed route/scheme</p>	<p>At the current time, no plans or planning application have been submitted for a Geological Disposal Facility at Theddlethorpe, and thus it is not possible to undertake a detailed assessment. Further information is provided in <i>ES Volume IV: Appendix 20-1: Cumulative Assessment supporting Information (Application Document 6.4.20.1)</i>.</p>
<p>Clarification is requested on whether a blast zone of 2.5km will be needed along the pipeline and, if so, how this will be achieved given the proximity of local housing infrastructure</p>	<p>The proposed pipeline design and routeing has been undertaken in accordance with PD 8010, specifically the requirements with regards to categorisation of substances, proximity to normally occupied buildings and population density. A Quantitative Risk Assessment has also been undertaken which considers societal risk. The pipeline is also to be constructed using heavy wall pipe which significantly reduces allowable distance to occupied buildings.</p>

1.12 Maritime & Coastguard Agency

Table 27: Maritime & Coastguard Agency

Maritime & Coastguard Agency Comment	Applicant's Response
<p>We note the project comprises of:</p> <ul style="list-style-type: none"> • A pipeline for the conveyance of CO₂, and apparatus and works associated therewith, including offtake, offshore pipeline tie-in and outlet facilities; • Shutdown valves; • Ancillary works integral to the construction of the pipeline, including; construction compounds, temporary access tracks, and laydown areas; • Land required for the construction, operation and maintenance of the pipeline; and • The use of the existing offshore pipeline down to Mean Low Water Spring (MLWS) 	<p>No response required.</p>
<p>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.</p>	<p>This is noted.</p>
<p>We note that the Scoping Report covers the V Net Zero Pipeline from the point of receipt of CO₂ at Immingham, through its onshore transportation in the new pipeline to the former TGT site, and onward transportation through the existing offshore pipeline to MLWS tide mark. Onward transmission from there would be part of a separate consent application. The Scoping Report relates to the onshore pipeline transportation system only.</p>	<p>No response required.</p>
<p>It is therefore our understanding that there are no works being undertaken below the Mean High Water Level as part of this project which would require consideration of the impact to</p>	<p>No response required.</p>

Maritime & Coastguard Agency Comment	Applicant's Response
<p>shipping and navigation on this occasion. We note the use of the 'existing offshore pipeline down to Mean Low Water Spring (MLWS)' which would fall within our remit. However, the scoping report implies it will be connect to existing infrastructure onshore to continue the system offshore; section 2.13.1 states "The onshore pipeline would enter the repurposed TGT site from the west and terminate at new facilities built next to the existing offshore Pipeline'.</p>	
<p>Any works undertaken below the Mean High-Water Level should be considered from the safety of shipping and navigation perspective. It is our understanding on this occasion there is no change in risk with regards to safe navigation of vessels and/or search and rescue obligations as part of this project.</p>	<p>This is noted – no works are proposed in association with the Proposed Development below Mean High Water Level.</p>

1.14 Ministry of Defence

Table 28: Ministry of Defence

Ministry of Defence Comment	Applicant's Response
<p>The development partly occupies the statutory safeguarding Range zone surrounding Donna Nook. Within this zone, the principal concern of the MOD is that the creation of new habitats may attract and support populations of large and, or, flocking birds and if there is any flying activity including gliding and microlight aircraft.</p>	<p>The Proposed Development will not include habitat creation which aims to attract flocking birds. Where habitats will be lost, they will be reinstated with the same or similar habitat types.</p>
<p>As this application is only at the Scoping Opinion stage, precise detail is not yet known, therefore in order that a full assessment can be undertaken precise co-ordinates need to be provided at future planning stages.</p>	<p>This is noted.</p>
<p>The MOD must emphasise that the advice provided within this letter is in response to the information detailed above in the document titled EIA-Scoping Report dated March 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.</p>	<p>This is noted.</p>

1.15 National Grid Electricity Transmission PLC (NGET)

Table 29: National Grid Electricity Transmission PLC (NGET)

National Grid Electricity Transmission PLC (NGET) Comment	Applicant's Response
<p>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:</p> <ul style="list-style-type: none"> • 2AH 400kV Grimsby West – South Humber Bank Killingholme - South Humber Bank • 4KG 400kV Grimsby West – South Humber Bank Grimsby West - Keadby 	<p>This is noted - no response required.</p>
<p>NGET's Overhead Line/s is protected by a Deed of Easement/Wayleave Agreement which provides full right of access to retain, maintain, repair and inspect our asset</p>	<p>This is noted - no response required.</p>
<p>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)</p>	<p>No permanent buildings/structures will be built beneath overhead lines (other than the buried pipeline). All design proposals will take due consideration of third-party technical specifications and GS6 Avoiding danger from overhead power lines, as appropriate.</p>
<p>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.</p>	<p>There is no intention to reduce ground levels at overhead lines and existing ground topography will be reinstated following installation of the buried pipeline. All design proposals will take due consideration of third-party technical specifications and GS6 Avoiding danger from overhead power lines, as appropriate.</p>
<p>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</p>	<p>This is noted - no response required.</p>

National Grid Electricity Transmission PLC (NGET) Comment	Applicant's Response
<p>should make sure that they are both aware of and understand this guidance.</p>	
<p>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.</p>	<p>Suitable protection measures will be installed (ie goal posts, working procedures, restricted working areas) to prevent incursion/working in close proximity to overhead powerlines in accordance with the third-party asset owners technical requirements and GS6 Avoiding danger from overhead power lines.</p>
<p>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.</p>	<p>Statutory safety clearances will be taken into account for all reinstatement planting including the planting schemes for the block valves.</p>
<p>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.</p>	<p>Suitable protection measures will be installed (ie goal posts, working procedures, restricted working areas) to prevent incursion/working in close proximity to overhead powerlines in accordance with the third-party asset owners technical requirements.</p>
<p>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.</p>	<p>All crossings will be agreed with Third-party asset owners in advance including protective provisions. All design proposals will take due consideration of third-party technical specifications, as appropriate.</p>
<p>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</p>	<p>There is no intention to reduce ground levels at overhead lines and existing ground topography will be reinstated following installation of the buried pipeline. All design proposals will take due consideration of third-party technical specifications, as appropriate.</p>

National Grid Electricity Transmission PLC (NGET) Comment	Applicant's Response
<p>consultation with NGET prior to any such changes in both level and construction being implemented.</p>	
<p>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.</p>	<p>There is no intention to reduce ground levels at overhead lines and existing ground topography will be reinstated following installation of the buried pipeline. All design proposals will take due consideration of third-party technical specifications, as appropriate. At this stage, there is no intention to divert third party assets.</p>
<p>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.</p>	<p>Noted</p>
<p>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.</p>	<p>Noted, Protective provisions are currently being sought in advance from all affected parties as part of the DCO process.</p>
<p>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</p>	<p>Noted, Protective provisions are currently being sought in advance from all affected parties as part of the DCO process.</p>

1.16 National Grid Gas Plc

Table 30: National Grid Gas Plc

National Grid Gas Plc Comment	Applicant's Response
<p>NGG has a high pressure gas transmission pipeline located within or in close proximity to the scoping area as follows:</p> <ul style="list-style-type: none"> • Feeder 9 Brocklesby to Stallingborough The transmission pipeline forms an essential part of the gas transmission network in England, Wales and Scotland. 	<p>Noted</p>
<p>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.</p>	<p>No permanent buildings/structures will be built beneath overhead lines (other than the buried pipeline). There is no intention to reduce ground levels at overhead lines and existing ground topography will be reinstated following installation of the buried pipeline. All design proposals will take due consideration of third-party technical specifications, as appropriate.</p>
<p>The following points should be taken into consideration: Pipeline Crossings: Where existing roads cannot be used, construction traffic should ONLY cross the pipeline at previously agreed locations.</p>	<p>All crossings will be agreed with Third-party asset owners in advance including protective measures. All design proposals will take due consideration of third-party technical specifications and HSG47 Avoiding danger from underground services, as appropriate.</p>
<p>The following points should be taken into consideration: Pipeline Crossings: 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.</p>	<p>All crossings will be agreed with Third-party asset owners in advance including protective measures. All design proposals will take due consideration of third-party technical specifications and HSG47 Avoiding danger from underground services, as appropriate.</p>
<p>The following points should be taken into consideration: Pipeline Crossings: The type of raft shall be agreed with NGG prior to installation</p>	<p>All crossings will be agreed with Third-party asset owners in advance including protective measures. All design proposals will take due consideration of third-party technical specifications and HSG47 Avoiding danger from underground services, as appropriate.</p>
<p>The following points should be taken into consideration: Pipeline Crossings:</p>	<p>All crossings will be agreed with Third-party asset owners in advance including protective measures. All design proposals will take due</p>

National Grid Gas Plc Comment	Applicant's Response
<p>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.</p>	<p>consideration of third-party technical specifications and HSG47 Avoiding danger from underground services, as appropriate.</p>
<p>The following points should be taken into consideration: Pipeline Crossings: NGG will need to agree the material, the dimensions and method of installation of the proposed protective measure.</p>	<p>All crossings will be agreed with Third-party asset owners in advance including protective measures. All design proposals will take due consideration of third-party technical specifications and HSG47 Avoiding danger from underground services, as appropriate.</p>
<p>The following points should be taken into consideration: Pipeline Crossings: The method of installation shall be confirmed through the submission of a formal written method statement from the contractor to NGG.</p>	<p>This is noted - no response required.</p>
<p>The following points should be taken into consideration: Pipeline Crossings: Please be aware that written permission is required before any works commence within the NGG easement strip.</p>	<p>This is noted - no response required.</p>
<p>The following points should be taken into consideration: Pipeline Crossings: An NGG representative shall monitor any works within close proximity to the pipeline to comply with NGG specification T/SP/SSW22.</p>	<p>This is noted - no response required.</p>
<p>The following points should be taken into consideration: Pipeline Crossings: A Deed of Consent is required for any crossing of the easement</p>	<p>This is noted - no response required.</p>

National Grid Gas Plc Comment	Applicant's Response
<p>The following points should be taken into consideration: Cable Crossings: Cables may cross the pipeline at perpendicular angle to the pipeline i.e. 90 degrees.</p>	<p>Pipeline is routed to cross third-party assets at 90 degrees, or a close as possible to perpendicular angle</p>
<p>The following points should be taken into consideration: Cable Crossings: An NGG representative shall supervise any cable crossing of a pipeline.</p>	<p>This is noted - no response required.</p>
<p>The following points should be taken into consideration: Cable Crossings: Clearance must be at least 600mm above or below the pipeline.</p>	<p>This is noted - no response required.</p>
<p>The following points should be taken into consideration: Cable Crossings: Impact protection slab should be laid between the cable and pipeline if cable crossing is above the pipeline</p>	<p>This is noted - no response required.</p>
<p>The following points should be taken into consideration: Cable Crossings: A Deed of Consent is required for any cable crossing the easement.</p>	<p>This is noted - no response required.</p>
<p>The following points should be taken into consideration: Cable Crossings: 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.</p>	<p>This is noted - no response required.</p>

National Grid Gas Plc Comment	Applicant's Response
<p>The following points should be taken into consideration: 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.</p>	<p>This is noted - no response required.</p>
<p>The following points should be taken into consideration: General Notes on Pipeline Safety: NGG will also need to ensure that our pipelines access is maintained during and after construction.</p>	<p>This is noted - no response required.</p>
<p>The following points should be taken into consideration: General Notes on Pipeline Safety: 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.</p>	<p>This is noted - no response required.</p>
<p>The following points should be taken into consideration: General Notes on Pipeline Safety: 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.</p>	<p>This is noted - no response required.</p>

National Grid Gas Plc Comment	Applicant's Response
<p>The following points should be taken into consideration: General Notes on Pipeline Safety: 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.</p>	<p>This is noted - no response required.</p>
<p>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.</p>	<p>All crossings have been identified and anticipated technique proposed, further details for individual crossings will be defined during the FEED stage. At this stage, there is no intention of diverting third party assets.</p>
<p>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.</p>	<p>Noted. At this stage, there is no intention of diverting third party assets.</p>
<p>Where the promoter intends to acquire land, extinguish rights, or interfere with any of NGG apparatus, protective provisions will be required in a form acceptable to it to be included within the DCO.</p>	<p>Noted, Protective provisions are currently being sort in advance from all affected parties as part of the DCO process.</p>
<p>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</p>	<p>Noted, Protective provisions are currently being sort in advance from all affected parties as part of the DCO process.</p>

1.17 NATS En-Route Safeguarding

Table 31: NATS En-Route Safeguarding

NATS Safeguarding	Applicants Response
<p>We refer to the consultation on the application referenced above. NATS operates no infrastructure within 20km of the proposal site. Accordingly, it anticipates no impact from the application and has no comments to make on the consultation.</p>	<p>This is noted - no response required.</p>

1.18 Newark and Sherwood District Council

Table 32: Newark and Sherwood District Council

Newark and Sherwood District Council	Applicants Response
<p>The site, as shown on Figure 1-2 on page 21 of the EN070008-000018-V Net Zero Pipeline EIA Scoping Report dated March 2022, is located outside of Newark and Sherwood District, some distance from the District Boundary, with other Local Authority areas located in-between. Indeed, Newark and Sherwood is not identified on Figure 1-3, which illustrates the 'V Net Pipeline Scoping Boundary'. Following a review of the Scoping Report, I can confirm that Newark and Sherwood District Council has no comments to make on the information to be provided in the Environmental Statement.</p>	<p>This is noted - no response required.</p>

1.19 NHS Lincolnshire CCG

Table 33: NHS Lincolnshire CCG

NHS Lincolnshire CCG	Applicants Response
We welcome the information and awareness regarding this scheme. We do not have any comments at this point in the process.	This is noted - no response required.

1.20 Norfolk County Council

Table 34: Norfolk County Council

Norfolk County Council	Applicants Response
Given the location of this NSIP proposal I can confirm that the County Council does not have any comments to make on the Scoping document.	This is noted - no response required.

1.21 North East Lincolnshire Council

Table 35: North East Lincolnshire Council

North East Lincolnshire Council	Applicants Response
<p>Thank you for your consultation on the scoping report for the above. The report has been reviewed and it is considered to be comprehensive in its content and identification of matters to be scoped. Please find attached comments from internal consultees in relation to Highways, Drainage, Environmental Health and Heritage. I would be grateful if the points raised could be taken into account. The Highways Officer raises a particular issue in relation to when surveys should be undertaken.</p>	<p>This is noted - no response required.</p>
<p>The route corridor options plan would benefit from greater clarity.</p>	<p>This plan has been explained in <i>ES Volume II Chapter 2: Design Evolution and Alternatives (Application Document 6.2.2)</i>.</p>
<p>In relation to the North East Lincolnshire Local Plan, it is considered that Policy 5 should also be referenced. This is an overarching Policy in terms of how developments relate to Development Boundaries.</p>	<p>This is noted - no response required.</p>
<p>It would be beneficial if greater clarity could be given to the actual safety and any risk associated with the gas in the pipeline. Clarity over its relationship/status in terms of HSE hazardous pipeline designations etc.</p>	<p>Project safety has been detailed in <i>ES Volume II Chapter 3: Description of the Proposed Development (Application Document 6.4.3)</i>.</p>
<p>At the Health and Well-being section 16.2.1 The NELC Local Plan is referenced as 2013 as opposed to 2018.</p>	<p>This has been amended.</p>
<p>The pipeline will cross rail infrastructure. It would be beneficial to scope these implications.</p>	<p>Railway crossings have been considered and consultation undertaken with Network Rail.</p>
<p>Land Quality appears to be adequately covered under Section 9 so Shaun is happy with the proposal and has no further comment to make at this stage. I have checked the noise aspect and found the proposal is satisfactory in terms of both operational and construction phases.</p>	<p>This is noted - no response required.</p>
<p>The information in the heritage assessment/EIA needs to provide sufficient evidence to understand the impact of the proposal on the significance of</p>	<p>The information provided in this ES Chapter 8 and associated Figures (<i>ES Volume III, Figures 8-1 to 8-2</i>) and Appendices (<i>ES Volume IV, Appendix 8-1 to Appendix 8-4</i>) is proportionate to the</p>

North East Lincolnshire Council	Applicants Response
<p>any heritage assets and their settings, sufficient to meet the requirements of paragraph 194 of the National Planning Policy Framework (NPPF).</p>	<p>likely impacts from the construction, operation and decommissioning of the Proposed Development and the significance of the assets.</p>
<p>The National Planning Policy Framework states that 'Where a site on which development is proposed includes or has the potential to include heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation' (para 194).</p>	<p>This is noted.</p>
<p>We would expect the EIA to contain a full archaeological evaluation report which explores in the first place non-intrusive evaluation of the site, and, if this suggests that further information is required we would expect intrusive evaluation in the form of trial trenching to further inform the heritage impact statement as to presence/absence/ location, depth, survival and significance of any remains. This should inform a suitable mitigation strategy for the impact.</p>	<p>Following detailed geophysical (magnetometer) survey a programme of trial trenching is proposed (see <i>ES Volume IV, Appendix 8-4: WSI for Archaeological Evaluation</i>). The results of the trial trenching programme will inform the development of a detailed archaeological mitigation strategy.</p>
<p>In addition to the underground remains we would expect a report on the potential impact on the historic landscape. North East Lincolnshire has had Historic Landscape Characterisation undertaken and this should be consulted.</p>	<p>An assessment of the potential impact on Historic Landscape Character is included in the historic environment desk-based assessment (<i>ES Volume IV, Appendix 8-1</i>).</p>
<p>Regarding setting issues, potential impacts on the settings and significance of designated and non-designated heritage assets which would experience visual change should be evidenced using accurate visual representations. Viewpoints, including views of, from, and across heritage asset receptors as well as general intervisibility, all have historic context and need to be assessed properly to determine the contribution of the setting of the heritage asset and the potential impact upon it by development or proposed mitigation measures.</p>	<p>Effects on the setting of heritage assets are assessed in this ES chapter, section 8.7, Potential Impacts and Assessment of Effects. The assessment takes into account the level of temporary impact from the construction of the pipeline, which will employ relatively small numbers of mobile plant over a 3–4-month period in any given section of the scheme, and the scale of the permanent above ground installations (Block Valve Stations, Immingham and Theddlethorpe Facilities). Viewpoints have been identified in collaboration with the LVIA team and will be dependent on public access.</p>
<p>The NPPF states that 'Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction or from</p>	<p>This is noted – no response required.</p>

North East Lincolnshire Council	Applicants Response
development within its setting), should require clear and convincing justification. ‘ (para200) and also ‘ the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application.’ (para 203)	
The Environmental Impact Assessment should contain sufficient information to enable an informed planning decision to be made.	This is noted – no response required.
From an EIA perspective there’s not a lot to add from a drainage perspective as it seems to all be covered, including ensuring existing land drainage encountered is maintained or enhanced. There’s also reference to trenchless crossings and watercourses and roads, thereby reducing the chances of damage to drainage infrastructure etc. Appropriate SuDs will be adopted for any new above ground infrastructure, so it all seems satisfactory.	This is noted – no response required.
I would ask that the applicants scope the Transport Assessment out with ourselves to ensure all committed developments and relevant junctions are included within the report.	The proposed locations of the Automatic Traffic Counts (ATCs) were reported in the Scoping Report and no suggested revisions to these were made. The Applicant has engaged with NELC during the full traffic and transport assessment.
I also assume there will be different sections to cover the construction phases and operational phases.	No assessment of operational traffic has been included because the predicted operational workforce is limited to inspection and periodic maintenance work. The operational activities are described in <i>ES Volume II Chapter 3 Description of the Proposed Development (Application Document 6.2.3)</i> .
In terms of the data collection We ask that this is done during the months of April, May, June, September and October on either a Tuesday, Wednesday or Thursday and during term time.	ATC surveys were undertaken during July 2022 to provide two-way traffic flows, classified by vehicle type, including HGVs. In line with TAG Unit M1.2 (Ref 12-2 of <i>ES Volume II Chapter 12 (Application Document 6.4.12)</i>) neutral periods are defined as

North East Lincolnshire Council	Applicants Response
	<p>Monday to Thursday from March through to November (excluding August) and avoiding the weeks before / after Easter.</p> <p>The locations and timings of the surveys were agreed with the relevant highway authority – see consultee response section below.</p> <p>Surveys of some additional construction routes were undertaken in June 2023.</p>

1.22 North East Lindsey Drainage Board

Table 36: North East Lindsey Drainage Board

North East Lindsey Drainage Board	Applicants Response
<p>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)).</p>	<p>This is noted.</p>
<p>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.</p>	<p>Consultation has taken place with Internal Drainage Boards (IDB) to identify all IDB watercourses. These are identified within this chapter and assessed for impacts (Section 11.7 of <i>ES Volume II Chapter 11 Water Environment (Application Document 6.2.11)</i>).</p>
<p>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</p>	

North East Lindsey Drainage Board	Applicants Response
<p>downloaded from the above web site hyperlink and following the link to North East Lindsey Internal Drainage Board web pages.</p>	
<p>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.</p>	<p><i>ES Volume IV Appendix 14-3: Drainage Strategy (Application Document 6.4.14.3)</i> identifies all known risks to the water environment and identifies appropriate measures to prevent pollution during construction; and to manage runoff rates. This will be developed further during detailed design. The Drainage Strategy will define the installation of pre-construction drainage measures to intercept run-off and ensure that discharge and runoff rates are controlled in quality and volume, in turn causing no degradation to water quality. This may include specific measures to be used in high-risk areas (for example construction along or across steep gradients and water course crossings). A phased approach may be taken to the development of the Drainage Strategy to reflect the phasing of the construction programme. The Drainage Strategy will include a Site Drainage Plan.</p>
<p>The Board requires unbroken, unhindered and unrestricted access for the Board's plant and machinery to maintained Board maintained drains at all times.</p>	<p>Noted, the land officer will be the point of contact on this issue as their responsibility involves discussing/ agreeing with landowners and tenants all conditions relating to access, including fencing, gates, access to severed land, stock relocation, reinstatement, drainage, security and the complaints handling procedure with local landowners.</p>

1.23 North Kesteven District Council

Table 37: North Kesteven District Council

North Kesteven District Council	Applicants Response
North Kesteven District Council has no comments to make in relation to the EIA Scoping Opinion submitted in respect of the above project.	This is noted – no response required.

1.24 North Lincolnshire County Council

Table 38: North Lincolnshire County Council

North Lincolnshire Council Comment	Applicant's Response
Air Quality	
This Council's Environmental Protection Department agrees with the proposal to include a robust assessment of impacts upon air quality within the Environmental Statement. The proposed approach to this assessment set out within the Scoping Report is considered to be acceptable and it is agreed that, due to the nature of the project, the potential air quality impacts are restricted to the construction phase	It is noted that North Lincolnshire Council's Environmental Protection Department agrees with the approach to the air quality assessment.
Contaminated land	
North Lincolnshire Council agree that a Phase 1 report in respect of land contamination should be submitted with any future application and depending on the findings, a Phase 2 report may be required	The information usually provided within a Phase 1 Report is included within <i>Volume II Chapter 9 Geology and Hydrology (Application Document 6.2.9)</i> . If required, a Phase 2 Report will be undertaken as part of the detailed design work. A conceptual Site Model and Risk Assessment is included in <i>ES Volume IV – Appendix 9-4 Conceptual Site Model (Application Document 6.4.9.4)</i> .
Cultural Heritage	
Due to other work commitments North Lincolnshire Council's Historic Environment Officer has been unable to complete their	Noted, please refer to the responses provided in Section 2 of this appendix.

North Lincolnshire Council Comment	Applicant's Response
<p>review of the scoping report in respect to the proposed approach to the assessment of potential impacts on cultural heritage. This review should be completed in short order and comments in respect of Cultural Heritage will be provided within the week. It is understood that these comments will not be able to be incorporated within the Planning Inspectorate's Scoping Opinion but it is hoped that they can be forwarded to the Applicant for consideration nonetheless.</p>	
<p>Ecology and Nature Conservation</p>	
<p>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.</p>	<p>This response has been noted.</p>
<p>As described in the report, the applicant(s) should provide the information reasonably required for a Habitats Regulations Assessment.</p>	<p>Refer to <i>Habitat Regulations Assessment (Application Document 6.4)</i>. for more details.</p>
<p>Furthermore, the proposed approach to protected and priority habitats and species is considered appropriate.</p>	<p>This response has been noted.</p>
<p>The proposal to collect survey information for, and to deliver, a 10% net gain in biodiversity is welcomed.</p>	<p>This response has been noted.</p>
<p>Flood Risk and Drainage</p>	
<p>The approach to assessment of potential flood risk and drainage impacts is considered to be satisfactory subject to the comments below. The submitted scoping reports recognises that surface water flood risk compliance needs to be mitigated against and the need to comply with SuDS requirements. It also states that the local internal drainage boards will need to be consulted, including NLC as the Lead Local Flood Authority where ordinary watercourse</p>	<p>Sustainability Urban Drainage Systems (SuDS) are proposed in the provisional outline design for above ground infrastructure (<i>ES Volume IV Appendix 11.3 Drainage Strategy</i>).</p>

North Lincolnshire Council Comment	Applicant's Response
<p>consents are required for alterations/connections to the local watercourse network.</p>	
<p>Landscape and Visual Amenity</p>	
<p>The approach to the assessment of landscape and visual amenity issues set out in Chapter 7 of the Scoping Report is considered to be satisfactory.</p>	<p>This response has been noted.</p>
<p>The representative views proposed will properly consider key receptors, including residents of Marsh lane and users of the England Coast Path.</p>	<p>Viewpoint 1 and Viewpoint 2 assess the impact on receptors at representative views along Marsh Lane and the England Coast Path. Refer to Figure 1 and Figure 2 in <i>ES Volume IV Appendix 7.2: Representative Photo-view (Application Document 6.4.7.2)</i>.</p>
<p>Noise and Vibration</p>	
<p>The Council's Environmental Health Officer has confirmed that this proposed approach is acceptable.</p>	<p>This response has been noted.</p>
<p>Transport</p>	
<p>The Council's Highways officer has confirmed that the proposed approach to the assessment of traffic and transport impacts set out in Chapter 14 of the scoping Report is acceptable.</p>	<p>This response has been noted.</p>
<p>Cumulative Effects</p>	
<p>The LPA is satisfied with the approach to the assessment of cumulative effects. It is noted that further discussions with the LPA is proposed with regards to agreeing a short list of projects likely to result in cumulation impacts with the proposed development and that will be included in the assessment of cumulative effects. This further liaison is welcomed.</p>	<p>This response has been noted. North Lincolnshire Council has been consulted on the Long List (refer to Table 20-4 in <i>ES Volume II Chapter 20 (Application Document 6.2.20)</i>).</p>

1.25 North Northamptonshire Council (East Northants Office)

Table 39: North Northamptonshire Council (East Northants Office)

North Northamptonshire Council (East Northants Office)	Applicant's Response
No Comment	Noted – no response required.

1.26 Nottinghamshire County Council

Table 40: Nottinghamshire County Council

Nottinghamshire County Council	Applicant's Response
I can confirm that Nottinghamshire County Council's Planning Policy Team does not wish to make any comments on this consultation.	Noted – no response required.

1.27 Peterborough City Council

Table 41: Peterborough City Council

Peterborough City Council	Applicant's Response
The proposal is remote from the Peterborough area, and we therefore do not have any comments.	Noted – no response required.

1.28 Royal Mail Group

Table 42: Royal Mail Group

Royal Mail Group	Applicant's Response
<p>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.</p> <p>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.</p> <p>Royal Mail and its advisor BNP Paribas Real Estate have reviewed the EIA Scoping Report dated March 2022. The construction of this infrastructure proposal has been identified as having potential to impact on Royal Mail operational interests. However, at this time Royal Mail is not able to provide a consultation response due to insufficient information being available to adequately assess the level of risk to its operation and the available mitigations for any risk. Therefore, Royal Mail wishes to reserve its position to submit a consultation response/s at a later stage in the consenting process and to give evidence at any future Public Examination, if required.</p>	<p>Noted – no response required.</p>

1.29 Rutland County Council

Table 43: Rutland County Council

Rutland County Council	Applicant's Response
<p>I can confirm that this Authority has no comment to make on this scoping request. The site is remote from our County Boundary and we do not consider that this element of the scheme will impact on us.</p>	<p>Noted – no response required.</p>

1.30 Theddlethorpe All Saints and St Helens Parish Council

Table 44: Theddlethorpe All Saints and St Helens Parish Council

Theddlethorpe All Saints and St Helens Parish Council	Applicant's Response
<p>Pipeline Route: An offshore seabed coastal based pipeline route has not been considered (or has not been shown to have been discounted) within the EIA and a purely land based model has been developed. This may be due to the Humber Estuary RAMSAR and the Coastal SAR which terminates at Theddlethorpe St Helen receiving site of the CO2.</p>	<p>Initial consideration was given to the feasibility of an offshore pipeline from Immingham to Theddlethorpe, as an alternative to an onshore pipeline. The challenges associated with an offshore pipeline, from an environmental consents, construction, UXO Ordnance and design perspective were considered to be too great to take this option forward. Further details are provided within <i>ES Volume II Chapter 2: Design Evolution and Alternatives (Application Document 6.2.2)</i>.</p>
<p>Pipeline Route: If the VNET project is of national significance and benefit, should an assessment & challenge be undertaken looking at the SAR & RAMSAR with a view to laying a new seabed based pipeline just off the coast? The new pipeline could be tunnelled under the current SAR sand dune area from neighbouring fields (this task was successfully undertaken for the Conoco Murdoch CMS pipeline in 1990). The pipeline would then run up the coast into the Humber Estuary where it could then join land nearer to the CO2 producing sites.</p>	<p>Initial consideration was given to the feasibility of an offshore pipeline from Immingham to Theddlethorpe, as an alternative to an onshore pipeline. The challenges associated with an offshore pipeline, from an environmental consents, construction and design perspective were considered to be too great to take this option forward. Further details are provided within <i>ES Volume II Chapter 2: Design Evolution and Alternatives (Application Document 6.2.2)</i>.</p>

Theddlethorpe All Saints and St Helens Parish Council	Applicant's Response
<p>Pipeline Route: A shoreline pipeline could be safely designed, constructed, laid, protected and operated with safety isolation, pigging, C&I & similar benefits to a land based pipeline, without the interruption & impact on landowners & communities. This option of having a pipeline laid within the estuary may also aid the future connection of other CO2 emitting area to the existing pipeline in a cost effective manner (Humber Industrial Cluster etc).</p>	<p>Initial consideration was given to the feasibility of an offshore pipeline from Immingham to Theddlethorpe, as an alternative to an onshore pipeline. The challenges associated with an offshore pipeline, from an environmental consents, construction and design perspective were considered to be too great to take this option forward. The Humber Estuary is the second largest coastal plain estuary in the U.K., and it is internationally important for wildlife such that it is designated as a Special Area of Conservation (SAC) and a Special Protection Area (SPA) under the Conservation of Habitats and Species Regulations 2017 (Habitats Regulations). It is also considered an internationally important wetland under the Ramsar Convention. The Humber Estuary is also a Site of Special Scientific Interest (SSSI), and there are three National Nature Reserves (NNR) within the locality and therefore very sensitive from an ecological perspective.</p> <p>Further details and justification for ruling out this option are provided within <i>ES Volume II Chapter 2: Design Evolution and Alternatives (Application Document 6.2.2)</i>.</p>
<p>Pipeline Route: Would the Environmental impact of using a pipe laying barge and installing a pipeline off the coast be a greater impact than that of a 53Km land based design travelling through the Lincolnshire Wolds, multiple communities & farming areas?</p>	<p>Initial consideration was given to the feasibility of an offshore pipeline from Immingham to Theddlethorpe, as an alternative to an onshore pipeline. The challenges associated with an offshore pipeline, from an environmental consents, construction and design perspective were considered to be too great to take this option forward. The Humber Estuary is the second largest coastal plain estuary in the U.K., and it is internationally important for wildlife such that it is designated as a Special Area of Conservation (SAC) and a Special Protection Area (SPA) under the Conservation of Habitats and Species Regulations 2017 (Habitats Regulations). It is also considered an internationally important wetland under the Ramsar Convention. The</p>

Theddlethorpe All Saints and St Helens Parish Council	Applicant's Response
	<p>Humber Estuary is also a Site of Special Scientific Interest (SSSI), and there are three National Nature Reserves (NNR) within the locality.</p> <p>Further details and justification for ruling out this option are provided within <i>ES Volume II Chapter 2: Design Evolution and Alternatives (Application Document 6.2.2)</i>.</p>
<p>Pipeline Route: Within the piping route selection and the potential use of existing pipeline infrastructure there is very little information on the EON K.I.P.P.S. pipeline, formally known as the Kinetica pipeline that is already in place between Immingham & the Theddlethorpe site since the 1990's. It is the Parish Councils understanding that this pipeline is no longer used or will no longer be used by companies who have the capability to produce into it. Should more detail be known within this report as to why it is unsuitable for alternative use, after all it was a dry clean gas pipeline?</p>	<p>The 30" Killingholme Pipeline System (KIPS) which runs between Killingholme and Theddlethorpe, was considered with particular focus on crossing points and potential utilisation of existing easements. The use of this pipeline was ultimately ruled out as the pipeline is currently in use and as the capacity and material specification of the pipeline was deemed inadequate for use to transport carbon dioxide at high pressures.</p>
<p>Cumulative Risk and Other Projects: Page 305 identifies projects that could have an impact or be impacted by the proposed project. This list considers projects that have been either approved or have been submitted to planning departments within a specific distance of the proposed pipeline route. The list though does not consider other project proposals that are currently in the public domain yet have not reached the governments planning portal but are known to Chrysaor UK Ltd. We understand that some of these projects may not be at an engineering level suitable for detailed impact assessment but from a cumulative risk perspective they should not be ignored within this assessment.</p>	<p>Developments that are more speculative or in early development cannot generally be included in the cumulative effects assessment as there is typically insufficient information upon which to base any meaningful cumulative assessment. However, based on consultation feedback received, one potentially speculative scheme has been included for further consideration (GDF at Theddlethorpe).</p>
<p>Cumulative Risk and Other Projects:</p>	<p>Refer to Table 20-2 of <i>ES Volume II Chapter 20 (Application Document 6.2.20)</i> where these projects are further discussed.</p>

Theddlethorpe All Saints and St Helens Parish Council	Applicant's Response
<p>The following projects are currently in proposal stage and there may be a lot more and further discussion with Lincolnshire County Council & Government groups should be undertaken to produce a full list:</p> <ul style="list-style-type: none">□ Nuclear Waste Services - Geological Disposal Facility intends to use the same site which will require a new offshore shipping pipeline (transport of waste mined clay from under the sea bed) & new train lines to be installed running to the site (to unload Nuclear Waste Material). The Parish Councils current perception is that there are 2 potential routes for a train line to be installed & both have the potential to cross the proposed pipeline route at some point. The pipeline route would probably be installed years before a train line, but installed & operated within the operational phase of the CO2 project site.□ Without the GDF proposal the local community have been informed over the past 2 years that the relevant Authorities were already in discussion with the department of transport under the Beachings reversal scheme for a train line to be installed as part of the overall Governments levelling up scheme. So some joined up thinking at this stage would be most welcome.□ Neptune Energy have submitted applications for the storage or CO2 offshore using the existing CMS Murdoch pipeline & offshore infrastructure. This project may be using a different chemical process or reaction to create the Hydrogen but equally it could use the CO2 provided from the installation of the new Chrysaor UK Ltd pipeline. The EN070008 proposal uses the 36" LOGGS pipeline & offshore infrastructure, with the Neptune Energy using the CMS/Murdoch pipeline which is currently owned by Chrysaor, so it is difficult to understand why is there no mention of it or cumulative risk assessment from either a competing, complementary or partnership project?	

Theddlethorpe All Saints and St Helens Parish Council	Applicant's Response
<p>Cumulative Risk and Other Projects: This section does not also consider alliances formed with other companies whom the project may also become part of, or projects that have been refused planning but are going through appeal and therefore the list may be incomplete.</p>	<p>The CO₂ to be transported in the Viking CCS Pipeline will be captured, conditioned and compressed by emitters, including Phillips 66 and VPI Immingham.</p> <p>Provision has been made for approximately five connections from emitters to the Immingham Facility. The facilities to capture, meter and compress any captured CO₂ for transport would be performed by the emitters themselves, such as at the Humber refinery operated by Phillips 66, or the Immingham combined heat and power plant operated by VPI (Vitol). Proposals by Phillips 66 and VPI (Humber Zero) are part of separate applications under the Town and Country Planning Act 1990 and, as such, these works do not form part of the Proposed Development. These applications form part of the Long List of other developments considered by the cumulative effects assessment in <i>ES Volume II Chapter 20 (Application Document 6.2.20)</i>.</p>
<p>Cumulative Risk and Other Projects: If it has not already taken place, could Chrysaor UK LTD undertake and sponsor a minor project with Lincolnshire County Council with regards to identifying other potential uses for the excavation trenching that would need to take place for such a large disturbance should it be approved (i.e. make the most out of a 53Km pipeline excavation) so that additional trenching would not be needed for other future projects. This trenching could have facilities incorporated into it (cable troughs or pipework routes for wind farm cabling, green electrical ring main, fresh water supply or digital communication conduits) for future projects to prevent disturbance of the Lincolnshire Countryside & reduce environmental impact from the carving up of the Country side by multiple individual developers.</p>	<p>The excavations for the proposed pipeline would be the minimum required for the installation of the Proposed Development in order to minimise the impacts of the works.</p> <p>It would be the aim of the project to have any excavations open for as short a time as possible which would make the incorporation of as yet unknown designs extremely unlikely.</p>
<p>Pipeline Emergency Safety</p>	<p>Details of the required venting are presented in <i>ES Volume II Chapter 3 (Application Document 6.2.3)</i>.</p>

Theddlethorpe All Saints and St Helens Parish Council	Applicant's Response
<p>Within the safety & environmental design this EIA suggests that venting of the pipeline will be undertaken at the onshore collection site Theddlethorpe. The onshore pipeline primary venting facility should be from the CO2 emitting sites (as these are existing industrial sites with existing infrastructure and located away from residential areas). This would reduce the level of CO2 discharged to atmosphere at the collection site (Theddlethorpe) which is located within a countryside rural setting with residential & tourism sectors affected. The only venting that should take place at the Theddlethorpe Site is from inventory that is trapped within the site boundary and needed to be vented to make the plant safe or as a last resort to the onshore pipeline. The venting of the offshore 36" LOGGS pipeline should be based at the offshore location only with redundancy designed & built in and remotely operated from a control centre, reducing the impact on the surrounding Theddlethorpe area.</p>	

1.31 United Kingdom Health Security Agency

Table 45: United Kingdom Health Security Agency

United Kingdom Health Security Agency	Applicant's Response
<p>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</p>	<p>For the Proposed Development, this has been considered using IEMA guidance on the significance of health receptors in <i>Section 17.7 of ES Volume II Chapter 17: Health and Wellbeing (Application Document 6.2.17)</i>.</p>

United Kingdom Health Security Agency	Applicant's Response
<p>need to ensure a proportionate assessment focused on an application's significant effects.</p>	
<p>Environmental Public Health: We understand that the promoter will wish to avoid unnecessary duplication and that many issues including air quality, emissions to water, waste, contaminated land etc. will be covered elsewhere in the Environmental Statement (ES). We believe the summation of relevant issues into a specific section of the report provides a focus which ensures that public health is given adequate consideration. The section should summarise key information, risk assessments, proposed mitigation measures, conclusions and residual impacts, relating to human health. Compliance with the requirements of National Policy Statements and relevant guidance and standards should also be highlighted.</p>	<p>For the assessment of potential impacts in <i>ES Volume II Chapter 17: Health and Wellbeing (Application Document 6.2.17)</i>, many of the impacts are derived from the results found in other chapters, concerning the topics of air quality, noise and vibration, traffic and transport, landscape, and visual impacts, socio-economics and land use. The cumulative effects of these impacts is also discussed in <i>Section 17.10</i> of this chapter.</p> <p>Issues including emissions to water, waste and contaminated land have not been considered for the assessment effects as there were no significant impacts identified for these factors, and therefore, no health impacts are envisaged.</p>
<p>Environmental Public Health: In terms of the level of detail to be included in an ES, we recognise that the differing nature of projects is such that their impacts will vary. UKHSA and OHID's predecessor organisation Public Health England produced an advice document 'Advice on the content of Environmental Statements accompanying an application under the NSIP Regime', setting out aspects to be addressed within the Environmental Statement. 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.</p>	<p>This has been considered within the development of <i>ES Volume II Chapter 17: Health and Wellbeing (Application Document 6.2.17)</i>.</p>
<p>Environmental Public Health: In general, the UKHSA is satisfied with the approach taken for the screening assessments. We note that with regard to the promoter's consideration of air quality, the promoter has screened out the requirement to carry out detailed air quality assessments that account for construction traffic emissions, however they will review stakeholder feedback and appraise routing and traffic data as to whether such an</p>	<p>In <i>ES Chapter 14 Air Quality (Application Document 6.2.14)</i>, construction phase traffic data has been reviewed and compared against the screening criteria set out in IAQM guidance and DMRB guidance. Data has been provided as two-way 24-hour AADT for road links affected by additional traffic movements generated by the pipe delivery to the compound at Immingham, and construction traffic movements on other roads links associated with other</p>

United Kingdom Health Security Agency	Applicant's Response
<p>assessment should be done. The UKHSA will await findings as they are made available of the detailed assessments that have been scoped in to consider other potential impacts arising from the proposed development, including those pertaining to the land and water environment.</p>	<p>construction activities. Table 14-17 in <i>ES Chapter 14 Air Quality (Application Document 6.2.14)</i> summarises the data the data on links that exceed one or both of the IAQM and DMRB criteria. All other links experience an increase in traffic flow of less than the screening criteria stated.</p>
<p>Environmental Public Health: It is noted that the current proposals do not appear to consider possible health impacts of Electric and Magnetic Fields (EMF).</p>	<p>Within the EIA, this has now been considered in <i>Section 17.7 of Chapter 17: Health and Wellbeing</i>.</p>
<p>Recommendation: The applicant should assess the potential public health impact of EMFs arising from the electrical equipment associated with the development. For more information on how to carry out the assessment, please see the accompanying reference for details.</p>	<p>The impact of EMFs has been considered negligible for this assessment. This is because the structure of the <i>Proposed Development</i> will not interfere with the current state of EMFs within the DCO Site Boundary. This is supported by information from EMFs.info (2023, available at: https://www.emfs.info/) which states that the main sources of EMFs are overhead lines, high-voltage underground cables and substations. Given that the Proposed Development and its subsequent components do not rely on such design elements, the effect of the Proposed Development is likely to be negligible. This is covered within <i>Section 17.4 of Volume II Chapter 17 Health and Wellbeing (Application Document 6.2.17)</i>.</p>
<p>Human Health and Wellbeing – OHID: This section of OHIDs response, 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:</p> <ul style="list-style-type: none"> • Access • Traffic and Transport • Socioeconomic 	<p><i>ES Volume II Chapter 17: Health and Wellbeing (Application Document 6.2.17)</i> has considered all of the four themes within the assessment of health impacts in the chapter. This is through incorporating the assessment of the findings of <i>ES Volume II Chapter 12: Traffic and Transport (Application Document 6.2.12)</i>, and <i>ES Volume II Chapter 16: Socio-economics and Land Use (Application Document 6.2.16)</i>.</p>

United Kingdom Health Security Agency	Applicant's Response
<p>• Land Use</p> <p>Having considered the submitted scoping report, OHID wish to make the following specific comments and recommendations.</p>	
<p>Determination of significant effects:</p> <p>Chapter 16 of the scoping report comments there are no established or widely accepted frameworks for assessing the 'significant' health effects of a development proposal. The scoping report proposes to provide a qualitative assessment of impacts using Table 16-7, which does not include an assessment of significance.</p> <p>The lack of an assessment of significance does not conform to the requirements of The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (2017 Regulations) and as such an assessment of significance should form part of the ES.</p> <p>Guidance on the assessment for population and human health has been published by the International Association for Impact Assessment (IAIA). This guidance could be used as the basis for an assessment of significant in accordance with the 2017 Regulations. It is noted that the scoping report also details general criteria for the assessment of significance in para 4.4.13 to 4.4.21 and Table 4.4, which could also form the basis of the determination of significance in the population and human health chapter.</p>	<p>In line with IEMA guidance <i>IEMA Guide to Determining Significance for Health</i> published in November 2022, <i>Volume II Chapter 17 Health and Wellbeing (Application Document 6.2.17)</i> sets out a significance assessment of the potential human health impacts of the Proposed Development. This was unavailable at the time of writing for the Scoping Report and has since been incorporated into the assessment of effects in <i>Section 17.7 of ES Volume II Chapter 17: Health and Wellbeing (Application Document 6.2.17)</i>.</p>
<p>Determination of significant effects:</p> <p>Recommendation</p> <p>The final ES must provide an assessment of significance for those health determinants scoped into the population and human health chapter.</p> <p>The population and human health assessment should draw upon the findings from other relevant chapters, including air quality and noise.</p> <p>As there is no UK national approach to the assessment of significance for human health it is strongly advised that any proposed approach is agreed with OHID/UKHSA and the local public health teams.</p>	<p>In line with IEMA guidance <i>IEMA Guide to Determining Significance for Health</i> published in November 2022, <i>Volume II Chapter 17 Health and Wellbeing (Application Document 6.2.17)</i> sets out a significance assessment of the potential human health impacts of the Proposed Development.</p>

United Kingdom Health Security Agency	Applicant's Response
<p>Physical activity and active travel: The report identifies significant potential impact through the loss or change in formal Public Rights of Way (PRoW), accessible open space and the existing road network. Physical activity forms an important part in helping to promote health and as such it is important that any changes have a positive long term impact where possible. It is not clear from the scoping report if usage surveys of the affected road network or PRoW are to be undertaken, in order to identify and quantify use by walkers, cyclists and horse riders. An assessment of significance should consider the sensitivity of the asset and frequency of use.</p>	<p>The findings of <i>ES Volume II Chapter 16: Socio-economics and Land Use (Application Document 6.2.16)</i> consider the potential impacts on PRoW from the <i>Proposed Development</i>. Consequently, these findings have been used to identify the effects on human health and wellbeing from any potential disruption or closures to the PRoW in <i>Section 17.7 of ES Volume II Chapter 17: Health and Wellbeing (Application Document 6.2.17)</i>.</p>
<p>Physical activity and active travel: Recommendations: The Traffic Assessment should identify impacts on pedestrians and cyclists including delay, amenity, or safety using the local road network, as outlined within Rules 1 and 2 of the IEMA GEART Guidelines. This should include an assessment of usage. The PRoW should be surveyed to assess usage in order to identify the need for mitigation and to assist in the determination of sensitivity of each PRoW.</p>	<p>Impacts on pedestrians and cyclists have been identified as outlined within Rules 1 and 2 of the IEA Guidelines (Ref 12-1 of <i>ES Volume II Chapter 12 Traffic and Transport (Application Document 6.2.12)</i>). This method is explained in section 12.4 of <i>ES Volume II Chapter 12 (Application Document 6.2.12)</i>.</p> <p>The sensitivity of users to individual PRoWs has been assigned as part of the assessment of socio-economic effects in <i>ES Volume II Chapter 16: Socio-economics</i>. This accounts for designation, condition of the routes and likely usage levels sufficient to identify whether mitigation is required.</p>
<p>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.</p>	<p><i>ES Volume II Chapter 17: Health and Wellbeing (Application Document 6.2.17)</i> has identified and considered the sensitive receptors in the Study area through <i>Section 17.5</i>. This is considered in the assessment of effects in this chapter through assessing sensitivity of the local population.</p> <p><i>Section 17.3 of ES Volume II Chapter 17: Health and Wellbeing (Application Document 6.2.17)</i> considers stakeholder engagement. Key stakeholders have been engaged throughout</p>

United Kingdom Health Security Agency	Applicant's Response
<p>These teams can assist in identifying local health baseline and local vulnerable populations.</p>	<p>the process, including at the Scoping Report and the PEIR stages of the <i>Proposed Development</i>.</p>
<p>Vulnerable populations/ sensitive receptors: Recommendation</p> <p>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 IAIA.</p>	<p>Baseline health data is presented in <i>Section 17.5 of Volume II Chapter 17 Health and Wellbeing (Application Document 6.2.17)</i>. This identifies vulnerable populations via the presentation of data relating to population, age, ethnicity, deprivation, health deprivation, self-assessment of health, and a number of wider health determinant indicators. These indicators align with WHIASU vulnerable populations list (age related groups, income related groups, groups who suffer discrimination or other social advantage, geographical groups). Additional socio-economic data relating to the local population is set out in ES Volume II: <i>Chapter 16: Socio-economics (Application Document 6.2.16)</i>. Within this chapter, a more detailed baseline section is presented, drawing on the most recent data available to inform the full assessment of Human Health and Wellbeing effects.</p>
<p>Report Format: A linear development will impact on a large number of separate communities, in addition to scheme wide impacts. This can create environmental statements that are overly complex and difficult to interpret. Report Format: Recommendation</p> <p>The final report should include scheme wide assessments supported by logically bounded community impact reports. These community impact reports should draw together relevant findings that relate to health.</p>	<p>Baseline conditions for each route section include relevant health, socio-economic and community receptors are set out in <i>Section 17.5 of Volume II Chapter 17 Health and Wellbeing (Application Document 6.2.17)</i>. These are considered within the assessment.</p>

1.32 West Lindsey District Council

Table 46: West Lindsey District Council

West Lindsey District Council Comment	Applicant's Response
2. Project Description (pages 11-33)	
<p>2.9.2/2.9.3 – It is recommended that the locations for the shutdown valves are identified as soon as possible so it is possible to assess the likely environmental impacts of these structures.</p>	<p><i>ES Volume II Chapter 3: Description of the Proposed Development (Application Document 6.2.3) outlines the location of the shutdown valves.</i></p>
<p>2.15.10 – The ES should contain details of construction compounds, their locations and likely environmental effects during the construction phases of development.</p>	<p><i>ES Volume II Chapter 3: Description of the Proposed Development (Application Document 6.2.3) outlines the location of the construction compounds and the environmental effects resulting from the construction phase are assessed in the relevant technical environmental assessments in ES Volume II Chapters 6-20 (Application Document 6.2). A Summary of the significant environmental effects including all those during the construction phase is included in ES Volume II Chapter 21: Summary (Application Document 6.2.21).</i></p>
3. Planning Policy Context (pages 34-40)	
<p>3.4.10 – 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/</p>	<p>Noted. No response required.</p>
4. Landscape & Visual	

West Lindsey District Council Comment	Applicant's Response
7.2.9 – Reference to the West Lindsey Local Plan should be replaced with the 'Central Lincolnshire Local Plan'.	Noted, this has been amended throughout the ES.
7.2.16 – It is agreed that the locations of the shutdown valves take account of the landscape sensitivities identified within the ES.	The need for the Block Valve Stations was determined through an initial engineering assessment. This was to enhance the safety of the Proposed Development and ensure sections of the pipeline could be isolated if required. This work identified block valve locations at approximately 13 km, 24 km and 39 km along the pipeline route. The locations of the Block Valve Stations lie outside of the Lincolnshire Wolds AONB. Planting associated with the Block Valve Stations has been sensitively designed and included within the Outline Landscape and Ecological Management Plan (<i>Application Document 6.10</i>).
7.8 - The West Lindsey Local Plan (2006) should be removed at section 7.8 References and replaced with the Central Lincolnshire Local Plan.	This has been amended in <i>ES Volume II Chapter 7: Landscape and Visual (Application Document 6.2.7)</i> and elsewhere in the ES.
19. Cumulative Effects	
Table 19-1 – It is advised that the Humber Low Carbon Pipeline NSIP (EN070006) is scoped into the 'Other Developments with the Potential for Inter-Project Impacts'.	The Humber Low Carbon Pipeline NSIP (EN070006) forms part of the Long List for the Cumulative Effects assessment in <i>ES Volume II Chapter 20 (Application Document 6.2.20)</i> .

2 Late responses

2.1 Health and Safety Executive

Table 47: Health and Safety Executive

Health and Safety Executive	Applicant's Response
Will the proposed development fall within any of HSE's consultation distances?	CO ₂ is not defined as a dangerous fluid under Pipeline Safety Regulations and, as such, CO ₂ pipelines are not classified as Major Accident Hazard

Health and Safety Executive	Applicant's Response
<p>CO₂ is not currently classified as a dangerous substance so this project would not currently come within scope of the Hazardous Substances Regulation, however it would need to be reviewed as to whether it came within the scope of the Pipeline Safety Regulations.</p>	<p>Pipelines (MAHPs). Consequently, developments around CO₂ pipelines are not currently subject to formal consultation from the HSE nor subject to the HSE's Land Use Planning (LUP) advice.</p> <p>However, the Applicant has followed the principle of the Regulations to ensure that safety is of paramount importance and that risks are identified and mitigated during the design and pre-construction stages. This is a key preventative measure which serves to help minimise the risk of a major accident (and subsequent related adverse environmental effects) occurring during the construction, operation, and decommissioning phases of the Proposed Development.</p>
<p>It needs to be noted that the proposed route does cross a major hazards pipeline and this needs to be considered. It is noted that this is NOT addressed in Section 2.8.6 which lists other types of crossing made by the proposed pipeline such as railways, rivers etc so would expect the crossing of the major hazards pipeline to be included and associated assessment and control measures to be implement to prevent a major accident.</p>	<p>It is known that there are Major Accident Hazard (MAH) pipelines within the DCO Site Boundary. Consultation with the assets owners has begun and crossing design would be such that physical damage does not occur. Protective Provisions are being prepared as required with the asset owner.</p>
<p>It is noted that Section 20 of the EIA covers Major Accident Hazards, the report does identify there are a number of major hazards sites with the vicinity of the proposed CO₂ pipeline, however there is limited impact assessment associated with these which should be covered in future submissions. It is also noted that although it does identify major hazard pipelines have been considered it does not identify any within 1km, however our records show the proposed route of the pipeline crosses a major hazards pipeline. This needs to be covered in future submissions.</p>	
<p>Explosives sites: As there are no HSE licenced sites in the vicinity of the proposed development HSE Explosives Inspectorate has no comments to make</p>	<p>This is noted. No response required.</p>

2.2 Natural England

Table 48: Natural England

Natural England Comment	Applicant's Response
<p>The proposal falls within Natural England's Impact Risk Zones of the following sites:</p> <ul style="list-style-type: none"> • Saltfleetby – Theddlethorpe Dunes Site of Special Scientific Interest (SSSI); • Saltfleetby – Theddlethorpe Dunes and Gibraltar Point Special Area of Conservation (SAC); • Humber Estuary SSSI and SAC; • North Killingholme Haven Pits SSSI • Humber Estuary Compensation Land. <p>Accidental damage and other direct or indirect effects may occur to these designated sites. The ES would need to show any potential effects on these designations, including impacts on foraging habitat, noise, water quality, air quality or other disturbance which may damage or destroy the interest features for which these SSSIs have been notified. Impacts would need to be considered at all stages of the Project i.e. construction, operation and de-commissioning. It should also detail the mitigation required to avoid any identified impacts on designated sites.</p>	<p>Potential effects upon designated sites will be considered within the ES and as part of the HRA process.</p>
<p>The Humber Habitat Compensation and Mitigation Plan (HHCMP) helps identify the scope of potential habitat creation needed to enable developers/investors to achieve sustainable economic development in the region. It provides essential information for those wishing to bring forward development within the requirements of the regulatory framework surrounding the Humber Estuary's various national and international environmental and historical designations. Further information is available at South Humber Gateway strategic mitigation scheme:</p>	<p>Noted – no response required.</p>

Natural England Comment	Applicant's Response
<p>https://www.nelincs.gov.uk/planning-and-building-control/planning-policy/the-localplan/local-plan-background-information/south-humber-gateway/</p>	
<p>Mitigation for all these [designated] sites should be secured through a CEMP which will set out the locations of these features and the measures proposed for their protection.</p>	<p>A Draft CEMP has been prepared (ES Volume IV <i>Appendix 3-1 (Application Document 6.4.3.1)</i>). The CEMP includes mitigation measures in respect of designated sites where this is considered necessary.</p>
<p>Natural England are engaging with the applicant via our Discretionary Advice Service with regard to avoiding adverse impacts to designated sites and protected species.</p>	<p>Ongoing consultation will be undertaken via the Discretionary Advice Service.</p>
<p>In-Combination/Cumulative impacts: The Environmental Statement should include in-combination / cumulative assessment. Natural England notes that the applicant has carried out a preliminary review to identify other development projects and development plan allocations that may require due consideration within the assessment of cumulative effects and that this list will be further refined as the final route of the pipeline is established.</p>	<p>This is contained in <i>Chapter 20: Cumulative Effects of the ES (Application Document 6.2.20)</i>. An in-combination assessment is also included in the HRA (<i>Application Document 6.5</i>).</p>
<p>Loss of Agricultural Land (BMV): In order to both retain the long-term potential of this land and to safeguard all soil resources as part of the overall sustainability of the whole development, it is important that the soil is able to retain as many of its many important functions and services (ecosystem services) as possible.</p>	<p>The standard practice soil management measures are outlined in the ES (and are further described within the Outline Soil Management (<i>ES Volume IV – Appendix 10.1, Application Document 6.4.10.1</i>) which would retain soil functions and services as far as is practicable.</p>
<p>Loss of Agricultural Land (BMV): The following issues should be considered and included as part of the Environmental Statement (ES): The degree to which soils would be disturbed or damaged as part of the development.</p>	<p>This has been covered in <i>ES Volume II Chapter 10 Agriculture and Soils (Application Document 6.2.10)</i>.</p>

Natural England Comment	Applicant's Response
<p>Loss of Agricultural Land (BMV): The following issues should be considered and included as part of the Environmental Statement (ES): The extent to which agricultural land would be disturbed or lost as part of this development, including whether any Best and Most Versatile (BMV) agricultural land would be impacted.</p>	<p>This has been covered in <i>ES Volume II Chapter 10 Agriculture and Soils (Application Document 6.2.10)</i>.</p>
<p>Loss of Agricultural Land (BMV): The following issues should be considered and included as part of the Environmental Statement (ES): The ES should set out details of how any adverse impacts on BMV agricultural land can be minimised through site design/masterplan.</p>	<p><i>Chapter 2: Design Evolution and Consideration of Alternatives</i> of this ES details how ALC was considered in the initial options appraisal assessment. Consequently, the Proposed Development's design is such that the majority of above ground infrastructure (permanent development), such as the Immingham Facility and Theddlethorpe Facility (Option 1) is located on non-agricultural land minimising the permanent loss of agricultural land to the development. Therefore development leading to permanent land loss has been limited to areas associated with the Block Valve Stations and the Theddlethorpe Facility (Option 2). Once installed, land above the pipeline will be reinstated to its original land use and quality.</p>
<p>Loss of Agricultural Land (BMV): The following issues should be considered and included as part of the Environmental Statement (ES): The ES should also set out details of how any adverse impacts on soils can be avoided or minimised and demonstrate how soils will be sustainably used and managed, including consideration in site design and master planning, and areas for green infrastructure or biodiversity net gain. The aim will be to minimise soil handling and maximise the sustainable use and management of the available soil to achieve successful after-uses and minimise offsite impacts.</p>	<p><i>Chapter 2: Design Evolution and Consideration of Alternatives</i> of this ES details how ALC was considered in the initial options appraisal assessment. Consequently, the Proposed Development's design is such that the majority of above ground infrastructure (permanent development), such as the Immingham Facility and Theddlethorpe Facility (Option 1) is located on non-agricultural land minimising the permanent loss of agricultural land to the development. Therefore, development leading to permanent land loss has been limited to areas associated with the Block Valve Stations and the Theddlethorpe Facility (Option 2).</p> <p>Although the pipeline itself is permanent development, the associated disturbance to soils and agricultural land, and removal of land from agricultural use, both from the laying of the pipeline and the formation of construction compounds and accesses etc. is all temporary. All soils</p>

Natural England Comment	Applicant's Response
	<p>and agricultural land are to be reinstated to their original land use and quality following construction - unless reinstatement for biodiversity enhancement is agreed with landowners. The provision of soil management measures is described above. Additional mitigation measures are included in <i>ES Volume IV: Appendix 3.1 (Application Document 6.4.3.1)</i> and in the Outline Soil Management Plan (<i>ES Volume IV: – Appendix 10.1, Application Document 6.4.10.1</i>).</p>
<p>Loss of Agricultural Land (BMV): In order to fully assess the impacts to BMV an Agricultural Land Classification may be necessary. This should normally be at a detailed level, e.g. one auger boring per hectare, (or more detailed for a small site) supported by pits dug in each main soil type to confirm the physical characteristics of the full depth of the soil resource, i.e. 1.2 metres.</p>	<p>A commitment has been made to undertake targeted detailed surveys post-consent, when the Front-End Engineering Design (FEED) is confirmed and hence the areas of disturbance are known. This data will aid in the production of and implementation of the Soil Management Plan, as well as providing baseline land quality data for the success of reinstatement within the pipeline working corridor to be measured against. All surveys would be undertaken to standard Natural England guidelines as summarised in the Scoping Opinion.</p> <p>A desk-based approach to the gathering of baseline soils and ALC data for areas of temporary disturbance is commonly employed in the assessment of linear energy infrastructure projects and local examples of where this methodology has been used include Viking Link (an interconnector from Denmark with 60 km underground cable through Lincolnshire) and Scotland England Green Link 2 (SEGL2) which used published data to establish baseline conditions for the impact assessment. The impact assessment for the export cable corridor NSIP Hornsea Project Four Offshore Wind Farm which is coincident with the Proposed Development in Section 2 (see section 10.10) also follows this desk-based approach</p>
<p>Loss of Agricultural Land (BMV): Further information is available in the Defra Construction Code of Practice for the Sustainable Use of Soil on Development Sites and The British Society of Soil Science Guidance Note Benefitting from Soil Management in Development and Construction. Further</p>	<p>This guidance (has been further described in Section 10.2 of <i>ES Volume II Chapter 10 (Application Document 6.4.10)</i>, has been considered in the assessment along with additional relevant guidance such as that issued by the Institute of Quarrying.</p>

Natural England Comment	Applicant's Response
<p>guidance is also set out in the Natural England Guide to assessing development proposals on agricultural land.</p>	
<p>Regionally and Locally: The ES should consider any impacts upon local wildlife and geological sites, including local nature reserves. The ES should set out proposals for mitigation of any impacts and if appropriate, compensation measures and opportunities for enhancement and improved connectivity with wider ecological networks. Consultation should therefore take place with the Ecology Officers for Lincolnshire County Council. Non-statutory consultees such as the Wildlife Trusts should also be approached.</p>	<p>Potential effects upon local wildlife sites, geological sites and nature reserves have been considered within the ES, refer to Sections 6.7, 6.8 and 6.9. within <i>ES Volume II Chapter 6: Ecology and Biodiversity (Application Document 6.2.6)</i>.</p>
<p>Protected Species: The ES should assess the impact of all phases of the proposal on protected species (including, for example, great crested newts, reptiles, birds, water voles, badgers and bats). It should also provide details of any proposed mitigation measures required to protect these species. Consideration should be given to the wider context of the site, for example in terms of habitat linkages and protected species populations in the wider area. Natural England is engaging with the applicant regarding Natural England's District Level Licensing for Great Crested Newt.</p>	<p>Effects upon protected and notable species from all phases of the development have been considered within <i>ES Volume II Chapter 6: Ecology and Biodiversity (Application Document 6.2.6)</i> refer to Section 6.5 for baseline information and 6.7 to 6.9 for the impact assessment and mitigation proposed.</p>
<p>Biodiversity Net Gain: The ES should include a BNG Assessment and Habitat Management Plan. The Habitat Management Plan should explain how the site will continue to be managed and secured for the lifetime of the development. The Habitat Management Plan should also provide details on retention and enhancement of existing habitat features such as hedgerows, woodland and ponds. We would also particularly need details on proposed habitat connectivity to surrounding habitats which would contribute to the wider Nature Recovery Network.</p>	<p>Noted. A BNG assessment has been included within the ES, refer to Application Document 6.7. An outline Landscape and Ecological Mitigation Plan (OLEMP) has also been prepared, refer to Application Document 6.8.</p>

Natural England Comment	Applicant's Response
<p>Biodiversity Net Gain: Biodiversity Metric 3.0 provides a way of measuring and accounting for biodiversity losses and gains resulting from development or land management change. It can be found at The Biodiversity Metric 3.0 - JP039 (nepubprod.appspot.com).</p>	<p>Noted. A BNG assessment has been included within the ES, refer to Application Document 6.7. An outline Landscape and Ecological Mitigation Plan (OLEMP) has also been prepared, refer to Application Document 6.8.</p>
<p>Impact on Protected and Local Landscapes: The proposed scheme includes a small section within the Lincolnshire Wolds Area of Outstanding Natural Beauty (AONB) and a reasonably significant section potentially or in its setting. The input of the Lincolnshire Wolds AONB Partnership would provide a valuable input into the report's assessment and recommendations for mitigation.</p>	<p>The Applicant has engaged with the Lincolnshire Wolds AONB Partnership and Lincolnshire Wolds Countryside Management Service.</p>
<p>Impact on Protected and Local Landscapes: The ES should include an assessment of local landscape character through the consideration of the relevant National Character Areas (NCAs) and any local landscape character assessments. We would expect the following forms of guidance to be used, as indicated in the scoping report:</p> <ul style="list-style-type: none"> • 'Guidelines for Landscape and Visual Impact Assessment' (3rd Edition) (GLVIA3), Landscape Institute and Institute of Environmental Management and Assessment, 2013; • 'An Approach to Landscape Character Assessment', Natural England, 2014: and • 'Visual Representation of Development Proposals Technical Guidance Note' 06/19, Landscape Institute, 2019. 	<p><i>ES Volume II Chapter 7 Landscape and Visual (Application Document 6.2.7) presents an assessment of local landscape character through the consideration of the relevant National Character Area and local landscape character assessment. See section 7.8 Potential Impacts and Assessment of Effects. The guidance that has been used in the ES is detailed in Section 7.2 Legislation, Policy and Guidance of this chapter and includes all the guidance indicated in the scoping report.</i></p>
<p>Natural England is undergoing engagement with the applicant and the Lincolnshire Wolds Countryside Management Service on potential impact on the Lincolnshire Wolds AONB.</p>	<p>Noted – no response required.</p>

Natural England Comment	Applicant's Response
<p>Connecting People with Nature: The ES should consider potential impacts on access land, common land, public rights of way and, where appropriate, the England Coast Path and coastal access routes and coastal margin in the vicinity of the development, in line with NPPF paragraph 100. It should assess the scope to mitigate for any adverse impacts. Rights of Way Improvement Plans (ROWIP) can be used to identify public rights of way within or adjacent to the proposed site that should be maintained or enhanced.</p>	<p>The potential impacts on public rights of way are assessed in section 16.7 of <i>ES Volume II Chapter 16 Socioeconomics (Application Document 6.2.16)</i>.</p> <p>There is no common land in the Study Area. The Proposed Development does not intersect with the England Coast Path, coastal access routes or the coastal margin.</p> <p>There is an area of Countryside Right of Way access land near Theddlethorpe which is identified in the relevant sections below and assessed as part of the development land assessment undertaken in this chapter.</p> <p>An Outline PRow Management Plan has been included in the DCO application, refer to <i>Application Document 6.11</i>.</p>
<p>Connecting People with Nature: The application is within the Protected Landscape Impact Risk Zone of the English Coastal Path – Mablethorpe to Humber Bridge (in progress).</p>	<p>Noted, this recreational route and PRow is acknowledged and assessed within <i>ES Volume II Chapter 16: Socio-economics (Application Document 6.2.16)</i>.</p>
<p>Connecting People with Nature: Measures to help people to better access the countryside for quiet enjoyment and opportunities to connect with nature should be considered. Such measures could include reinstating existing footpaths or the creation of new footpaths, cycleways, and bridleways. Links to other green networks and, where appropriate, urban fringe areas should also be explored to help promote the creation of wider green infrastructure. Access to nature within the development site should also be considered, including the role that natural links have in connecting habitats and providing potential pathways for movements of species</p>	<p>The approach to the reinstatement of existing Public Rights of Way following construction works is discussed in <i>ES Volume II Chapter 3: The Viking CCS Pipeline (Application Document 6.2.3)</i>. Arrangements for the maintenance of Public Rights of Way and suitable arrangements to protect the public will be expanded on in the Construction Environmental Management Plan (CEMP).</p>
<p>Connecting People with Nature: Relevant aspects of local authority green infrastructure should be incorporated where appropriate.</p>	<p>Local Authority green infrastructure strategies/policies have been referenced in Table 16-2 of <i>ES Volume II Chapter 16 Socio-economics (Application Document 6.2.16)</i>. The assessment of the impact of the</p>

Natural England Comment	Applicant's Response
	<p>Proposed Development on Public Rights of Way within this chapter takes into account, where applicable, the requirement that PRowWs are protected and maintained. The policy context also informs the assignment of the sensitivity of the receptor.</p>
<p>Connecting People with Nature: The ES should include details of the decommissioning and after use of the site and how it will be restored.</p>	<p>Socio-economic effects during the decommissioning phase have been included within the socio-economics assessment in section 16.7 of <i>ES Volume II Chapter 16 Socio-economics (Application Document 6.2.16)</i>. Details of the decommissioning strategy are provided in <i>ES Volume IV Appendix 3.5 Decommissioning Strategy (Application Document 6.4.3.5)</i> and include that: the Immingham and Theddlethorpe Facilities will be reinstated as brownfield land and covered with Ministry of Transport Type 1 material; Block Valve Stations will likely be reinstated for agricultural use including the spreading of topsoil, and the pipeline will remain in situ. On this basis, given the reinstatement and restoration of land, an assessment of the after-use of the site is not deemed necessary given the unlikelihood of significant effects occurring.</p>

Natural England Comment	Applicant's Response
Second Late Response	
<p>Natural England has further advice to add to our response of 10 March 2022 on the scope of the Environmental Statement.</p>	<p>This is noted, no further response required.</p>
<p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p>	<p>This is noted, no further response required.</p>
<p>I have been informed that the East Midlands Area Team in Natural England is supporting a proposal for a Heritage Coast definition for the stretch of coast from Humberstone Fitties in the north to just north of Mablethorpe in the south. I have attached an image of the section of the draft outline boundary map to the north of Mablethorpe to this letter. Please see below information regarding Heritage Coasts and our advice on the proposal.</p>	<p>This is noted, and this situation has been monitored as the Proposed Development has progressed.</p>
<p>Brief overview of Heritage Coasts, they:</p> <ul style="list-style-type: none"> • are stretches of the most beautiful, undeveloped coastline in England. They are managed in order to conserve their natural beauty and, where appropriate, to improve accessibility for visitors; • are definitions rather than a designation. This means there is no statutory process when it comes to deciding on a Heritage Coast. They are defined by an agreement between the relevant maritime authorities in that local area, and Natural England; • make up around thirty-three per cent of scenic English coastline; • started when Beachy Head in Sussex was defined (the Durham Coast was the most recent). 	<p>This is noted, and this situation has been monitored as the Proposed Development has progressed.</p>

Natural England Comment	Applicant's Response
<p>A Heritage Coast should:</p> <ul style="list-style-type: none"> • comprise a coastline of exceptionally fine scenic quality; • exceed one mile in length; • be substantially undeveloped; • contain features of special significance and interest, whether natural or man-made. 	<p>This is noted, no response required.</p>
<p>Natural England is supporting the definition of Heritage Coast for this stretch of Lincolnshire coastline because:</p> <ul style="list-style-type: none"> • A sustainable heritage coastal environment will provide high quality facilities for communities and visitors, improvements for wildlife and contribute to a healthy local economy • It is a key component of Natural England's East Midlands Area Team's strategy to promote landscape scale change in this area (along with habitat improvement and community engagement through the EU Life Dynamic Dunescapes project). • Lincolnshire County Council foresees major benefits from a Heritage Coast definition for both nature and the local economy (potentially millions of pounds) • Lincolnshire Wildlife Trust and East Lindsey District Council are additional supportive partners and see significant benefits in achieving a Heritage Coast for this stretch of Lincolnshire Coast 	<p>This is noted, and this situation has been monitored as the Proposed Development has progressed.</p>

Natural England Comment	Applicant's Response
<p>Planning Policy:</p> <ul style="list-style-type: none">• Heritage Coasts continue to be valued for a range of reasons and are included within section 15 of the National Planning Policy Framework (revised 2021). Paragraphs 174, 176 and 178 are the most relevant.• Paragraph 174 states that: Planning policies and decisions should contribute to and enhance the natural and local environment by:(c) maintaining the character of the undeveloped coast, while improving public access to it where appropriate;• Paragraph 176 refers to Areas of Outstanding Natural Beauty and National Parks• Paragraph 178 states that: Within areas defined as Heritage Coast (and that do not already fall within one of the designated areas mentioned in paragraph 176), planning policies and decisions should be consistent with the special character of the area and the importance of its conservation. Major development within a Heritage Coast is unlikely to be appropriate, unless it is compatible with its special character.	<p>This is noted, and this situation has been monitored as the Proposed Development has progressed.</p>

Natural England Comment	Applicant's Response
<p>Request for Further Information: I have discussed the proposal with Natural England colleagues working on the proposal and advised the applicant that it is hoped that this stretch of coast might be defined as a Heritage Coast within the next year. To allow any assessment of potential impacts and mitigation options relating to the V Net Zero Pipeline, we have requested the following information: What new infrastructure will be needed/developed within the coastal strip – i.e. within the beach including the dunes, and immediately behind the dunes to approximately 1 km inland? We are interested in new structures within the proposed Heritage Coast boundary itself, which here would literally just include the beach and dunes, but also any development inland which might be visible from within the potential Heritage Coast boundary.</p> <p>If there is likely to be new infrastructure, what are the details of the structures and likely construction phase (obviously provisional at this stage).</p> <p>Will the pipeline and any associated infrastructure on the beach/dunes be buried? Will anything be left visible and if so what might that be (size/height)?</p>	<p>There is an existing isolation valve (Dune Isolation Valve) on the onshore section of the LOGGS pipeline, located close to the sand dunes to the east of the former TGT site, which was used as an isolation valve for Theddlethorpe when importing gas from offshore. A new replacement valve will be provided in the same location. The photograph of the existing Dune Isolation Valve and the construction work involved to replace this is described in Section 3.11.5 of ES Volume II Chapter 3 Description of the Proposed Development (Application Document 6.2.3).</p> <p>There is currently both electrical and instrument cabling in place between the dunes valve and the proposed Theddlethorpe Facilities and the preferred option would be to re-use this cabling for the project; however, this would depend on successfully testing the cabling and determining if it is fit for purpose.</p> <p>In the event that the pre-existing cables are unsuitable for use then the intention would be to replace them. The construction work involved is described in Section 3.11.5 of <i>ES Volume II Chapter 3 Description of the Proposed Development (Application Document 6.2.3)</i>.</p> <p>Nothing would be left visible eastwards of the Dune Isolation Valve.</p>

Natural England Comment	Applicant's Response
<p>It seems to be suggested in the EIA scoping report that the old Theddlethorpe Gas Terminal gas pipeline may be used, therefore no new piping or other infrastructure may be needed in this coastal zone. If that is the case, will there be any associated works, for example to confirm the state of the existing pipeline? If so, what are the details - the location, scale, type and likely longevity of activity, and associated activity to make good.</p>	<p>Yes, this is the current plan. The existing LOGGS 36" pipeline (offshore pipeline) enters the former TGT site from the east and terminates at an existing shutdown valve within the site. Several assessments have been undertaken of the pipeline including, a review of operational records, previous intelligent pigging results, a fracture assessment, integrity assessment and CO₂ corrosion assessment, and the LOGGS pipeline was designed and constructed to a high engineering specification when originally installed which have resulted in high confidence that the pipeline will be suitable for the transportation of the CO₂ as part of the wider Viking CCS Project.</p> <p>Further inspection of the existing LOGGS pipeline will be undertaken, which will be completed using an intelligent pigging ('PIG') tool to assess the internal surfaces of the pipeline. As this is an internal inspection there will be no visible survey activity within the dunes or foreshore, and the work will not generate any sources of potential impact. In the unlikely event that the PIG inspection was to identify any issues, any potential remedial action cannot accurately be predicted at this stage, as much would depend upon the nature and location of the issue.</p>

2.3 North Lincolnshire County Council

Table 49: North Lincolnshire County Council

North Lincolnshire County Council Comment	Applicant's Response
<p>Heritage baseline: The archaeological consultant has recently obtained the HER records and spatial data for the EIA study area around the development. Our records show that the area of the Pipeline Project in North Lincolnshire to the south of the VPI power plant contains known archaeological sites of prehistoric and Romano-British occupation and has high potential to contain further as yet unrecorded archaeological remains of this date range, as well as palaeoenvironmental deposits with the potential to inform the archaeological resource such as the effects of sea level and climate changes on the surrounding environment</p>	<p>This is noted – no response required.</p>
<p>Heritage baseline: Previous archaeological evaluations and excavations in this area have recorded an Iron Age and Roman settlement site on the site of the VPI power plant (formerly the Conoco CHP plant), Iron Age enclosures and roundhouses along the new A160 junction with Rosper Road, Bronze Age activity, Iron Age and Roman occupation east of the old junction, and a triple-ditched enclosure surrounding a Roman settlement adjoining the scoping boundary within Houlton's Covert and where the extensive Roman occupation extends over the boundary into North East Lincolnshire.</p>	<p>This is noted – no response required.</p>
<p>Heritage baseline: Despite the industrial landscape in this area, there is high potential that further archaeological remains and significant palaeoenvironmental deposits associated with former tidal inlets will survive within the proposed development site, currently of unknown significance that would be disturbed and or destroyed during construction</p>	<p>This is noted – no response required.</p>
<p>Heritage baseline:</p>	<p>This is noted. A comprehensive DBA (desk-based assessment) has been undertaken (<i>ES Volume IV, Appendix 8-1</i>). A specialist</p>

North Lincolnshire County Council Comment	Applicant's Response
<p>In view of this potential, and in accordance with policy 194 of the NPPF, Core Strategy CS6 and saved Local Plan policies HE8 and HE9, detailed heritage assessment including archaeological field evaluation would be required for new development proposals in this area</p>	<p>review of aerial photographs and LiDAR coverage is included as <i>ES Volume IV, Appendix 8-2</i> and detailed geophysical (magnetometer) surveys have been undertaken (<i>ES Volume IV, Appendix 8-3</i>) and a programme of archaeological evaluation is proposed (<i>ES Volume IV, Appendix 8-4</i>).</p>
<p>Relevant Policy: 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.</p>	<p>This is noted – no response required.</p>
<p>Relevant Policy: 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'.</p>	<p>This is noted – no response required.</p>
<p>Relevant Policy: 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.'</p>	<p>This is noted. A comprehensive DBA (desk-based assessment) has been undertaken (<i>ES Volume IV, Appendix 8-1</i>). A specialist review of aerial photographs and LiDAR coverage is included as <i>ES Volume IV, Appendix 8-2</i> and detailed geophysical (magnetometer) surveys have been undertaken (<i>ES Volume IV, Appendix 8-3</i>) and a programme of archaeological evaluation is proposed (<i>ES Volume IV, Appendix 8-4</i>).</p>

North Lincolnshire County Council Comment	Applicant's Response
<p>Relevant Policy: 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).</p>	<p>This is noted. The information provided in ES Chapter 8 and associated Figures (<i>ES Volume III, Figures 8-1 to 8-2</i>) and Appendices (<i>ES Volume IV, Appendix 8-1 to Appendix 8-4</i>) is proportionate to the likely impacts from the construction, operation and decommissioning of the Proposed Development and the significance of the assets.</p>
<p>Relevant Policy: 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.</p>	<p>This is noted – no response required.</p>
<p>Relevant Policy: 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.’</p>	<p>This is noted. A comprehensive DBA (desk-based assessment) has been undertaken (<i>ES Volume IV, Appendix 8-1</i>). A specialist review of aerial photographs and LiDAR coverage is included as <i>ES Volume IV, Appendix 8-2</i> and detailed geophysical (magnetometer) surveys have been undertaken (<i>ES Volume IV, Appendix 8-3</i>) and a programme of archaeological evaluation is proposed (<i>ES Volume IV, Appendix 8-4</i>).</p>
<p>Relevant Policy: 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.’</p>	<p>This is noted – no response required.</p>
<p>Relevant Policy: 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</p>	<p>This is noted – no response required.</p>

North Lincolnshire County Council Comment	Applicant's Response
<p>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.</p>	
<p>Relevant Policy: 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.'</p>	<p>This is noted – no response required.</p>
<p>Heritage Assessment – Scoping Advice: Any application submitted for this proposed development will need to be accompanied by a heritage assessment prepared in line with the HER advice in this memo. A suitably experienced heritage specialist should carry out the following assessments on the applicants behalf and should comprise ALL the following stages:</p>	<p>This is noted – no response required.</p>
<p>Heritage Assessment – Scoping Advice: 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 a minimum 2km from the site boundary for designated heritage assets and 1km for nondesignated heritage assets 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.</p>	<p>A comprehensive DBA (desk-based assessment) has been undertaken (ES Volume IV, Appendix 8-1). This has considered data from a range of sources, including the results of a specialist review of aerial photographs and LiDAR coverage (<i>ES Volume IV, Appendix 8-2</i>).</p> <p>In terms of spatial scope, the DBA has considered designated heritage assets up to 5km from the DCO Site Boundary where the settings of designated heritage assets of the highest significance (heritage value) (being scheduled monuments, Grade I and Grade II* listed buildings) may be impacted. No potential impacts on the settings of designated heritage assets beyond 2km were identified and therefore designated heritage assets between 2km and 5km were scoped out of the assessment.</p>

North Lincolnshire County Council Comment	Applicant's Response
	<p>Non-designated heritage assets have been considered up to 500m from the DCO Site Boundary. This 500m study area has been defined in order to capture detail about known heritage assets and will allow proportionate and sufficient archaeological context to be gathered to understand the potential for previously unknown heritage assets to be present. Non-designated heritage assets outside of the 500m study area and up to 1km have been considered where these provide context and inform the potential for unknown archaeology within the DCO Site Boundary.</p> <p>A study area of 1km has been used to identify any historic landscape features likely to be impacted by the Proposed Development.</p>
<p>Heritage Assessment – Scoping Advice: Desk Based Research Heritage Assessment – Scoping Advice: Geo-archaeological assessment of existing data for the site to produce a preliminary deposit model of the sub-surface of the application site and identify gaps for further investigation</p>	<p>Desk-based research – see response above.</p> <p>A programme of geo-archaeological assessment is included in the proposed archaeological evaluation programme (<i>ES Volume IV Appendix 8-3 (Application Document 6.4.8.3)</i>).</p>
<p>Heritage Assessment – Scoping Advice: Desk Based Research Site visit 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</p>	<p>A walkover survey and setting assessment of heritage assets within the DCO Site Boundary and study areas was undertaken in February 2023. The results of this walkover are integrated into the baseline report (refer to <i>ES Volume IV Appendix 8.1 Historic Environment Desk-Based Assessment (Application Document 6.4.8.1)</i>).</p>
<p>Pre-Application Archaeological Field Evaluation: Archaeological monitoring and recording during geo-technical investigations on the site.</p>	<p>This is noted. Geo-technical investigations have not yet taken place but will do so in advance of any construction activities commencing on site.</p>
<p>Pre-Application Archaeological Field Evaluation: Hand augering or machine drilled purposive coring to fill any identified gaps in the deposit model, to identify and model the deposit sequence and</p>	<p>A programme of geo-archaeological assessment is included in the proposed archaeological evaluation programme (<i>ES Volume IV, Appendix 8-4</i>).</p>

North Lincolnshire County Council Comment	Applicant's Response
<p>former land surfaces, and provide an understanding of the development of the landscape; and/or 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.</p>	
<p>Pre-Application Archaeological Field Evaluation: Geophysical survey of the working width of the pipeline corridor to identify and plot anomalies of potential archaeological origin</p>	<p>Detailed geophysical (magnetometer) surveys (<i>ES Volume IV, Appendix 8-3</i>) have been undertaken on accessible land suitable for survey across the full DCO Site Boundary.</p>
<p>Pre-Application Archaeological Field Evaluation: Excavation of sample trial trenches to determine the nature, extent, state of preservation and importance of any archaeological remains within the proposed development area informed by the results of preceding stages of study and survey.</p>	<p>Following detailed geophysical (magnetometer) survey a programme of trial trenching is proposed (see <i>ES Volume IV, Appendix 8-4: WSI for Archaeological Evaluation</i>). The results of the trial trenching programme will inform the development of a detailed archaeological mitigation strategy.</p>
<p>Pre-Application Archaeological Field Evaluation: 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.</p>	<p>This is noted. A written scheme of investigation (WSI) for archaeological evaluation is provided at <i>ES Volume IV, Appendix 8-4</i>. This stipulates that the appointed archaeological contractor will be a Registered Organisation accredited by the Chartered Institute for Archaeologists (CIfA). The appointed contractor will have access to all relevant expertise and all fieldwork will be undertaken in accordance with CIFA's published Standards and Guidance for evaluation, and Historic England professional guidelines. The WSI will be subject to approval by the relevant LPA archaeological advisors.</p>
<p>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</p>	<p>This is noted. Assessment of impacts of the Proposed Development on the significance of heritage assets scoped into the assessment are addressed in <i>ES Volume I, Chapter 8, Section 8.7, Potential Impacts and Assessment of Effects</i>. The</p>

North Lincolnshire County Council Comment	Applicant's Response
<p>assessment of the significance of heritage assets will take account of the combined results of all the preceding stages of desk based assessment and site 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/imagesbooks/publications/conservation-principles-sustainable-management-historic-environment/</p>	<p>results of historic and ongoing fieldwork are taken into account in the assessments of the value of assets and magnitude of change presented in <i>ES Volume I, Chapter 8</i> and the DBA (<i>ES Volume IV, Appendix 8-1</i>).</p>
<p>Assessment of Significance: 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/imagesbooks/publications/gpa3-setting-of-heritage-assets/.</p>	<p>This is noted. The methodology of assessing the contribution of setting to significance has been undertaken in line with the guidance set out in Historic England's Historic Environment Good Practice Advice Note 3 ('The Setting of Heritage Assets' 2nd Edition, 2017). This is set out in the DBA (<i>ES Volume IV, Appendix 8-1</i>)</p>
<p>Assessment of Significance: The use of photographic visualisations from appropriate viewpoints towards and out from the proposed site 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.</p>	<p>Effects on the setting of heritage assets are assessed in this ES chapter, Section 8.7, Potential Impacts and Assessment of Effects. Viewpoints have been identified in collaboration with the LVIA team.</p>
<p>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.</p>	<p>This is noted. The impact of the development on the significance of the heritage assets is set out in <i>ES Volume II, Chapter 8, Section 8.7, Potential Impacts and Assessment of Effects</i>. The need case for the Proposed Development is set out in <i>ES Volume II Chapter 3: Description of the Proposed Development</i>.</p>
<p>Assessment of Impact:</p>	<p>This is noted – no response required.</p>

North Lincolnshire County Council Comment	Applicant's Response
<p>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.</p>	
<p>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.</p>	<p>Mitigation measures are set out in <i>ES Volume II, Chapter 8, Section 8.8, Additional Mitigation and Enhancement Measures</i>. A detailed archaeological mitigation strategy will be developed and agreed during Examination.</p>
<p>Mitigation: Where harm is unavoidable, measures to offset the harm to significance should be included; in the case of archaeological 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.</p>	<p>See above response. Mitigation measures are set out in <i>ES Volume II, Chapter 8, Section 8.8, Additional Mitigation and Enhancement Measures</i>. A detailed archaeological mitigation strategy will be developed and agreed during Examination.</p>
<p>Mitigation: Assessing the value of heritage assets and the magnitude of change (see 8.5.3 & 8.5.6, 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.</p>	<p>This is noted. The ES takes account of the results of the DBA, Aerial Photograph Assessment and LiDAR Analysis and Geophysical Survey (<i>ES Volume IV, Appendices 8-1, 8-2 and 8-3</i> respectively).</p>
<p>Mitigation: 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.</p>	<p>This is noted. The impact of the development on the significance of the heritage assets is set out in <i>ES Volume I, Chapter 8, Section 8.7, Potential Impacts and Assessment of Effects</i>.</p>
<p>Mitigation: 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</p>	<p>This is noted. Mitigation measures are set out in <i>ES Volume II, Chapter 8, Section 8.8, Additional Mitigation and Enhancement Measures</i>. A detailed archaeological mitigation strategy will be developed and agreed during Examination.</p>

North Lincolnshire County Council Comment	Applicant's Response
<p>avoiding or minimizing effects to areas of significance, if necessary, by modifying the layout and/or design of the proposals ie. In situ preservation.</p>	
<p>Mitigation: 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</p>	<p>This is noted. Mitigation measures are set out in <i>ES Volume II, Chapter 8 (Application Document 6.2.8)</i>, Section 8.8, Additional Mitigation and Enhancement Measures. A detailed archaeological mitigation strategy will be developed and agreed during Examination.</p>
<p>Mitigation: 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.</p>	<p>This is noted. Mitigation measures are set out in <i>ES Volume II, Chapter 8 (Application Document 6.2.8)</i>, Section 8.8, Additional Mitigation and Enhancement Measures. A detailed archaeological mitigation strategy will be developed and agreed during Examination.</p>
<p>Mitigation: 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.</p>	<p>This is noted. A Draft CEMP (<i>ES Volume IV Appendix 3.1 (Application Document 6.4.3.1)</i>) contains a mitigation register which is secured via a requirement as set out in the <i>Draft DCO (Application Document 2.1)</i>.</p>
<p>Recommendation: Any application submitted for this site would need to be accompanied by an adequate Historic Environment 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.</p>	<p>This is noted. No response required.</p>
<p>Recommendation: 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</p>	<p>This is noted. No response required.</p>

