



Department for
Energy Security
& Net Zero

Energy Infrastructure Planning
Department for Energy Security and
Net Zero

3 – 8 Whitehall Place
London SW1A 2EG

E:

[energyinfrastructureplanning@energy
security.gov.uk](mailto:energyinfrastructureplanning@energysecurity.gov.uk)

National Gas Transmission
Warwick Technology Park
Gallows Hill, Warwick
CV34 6DA

13 May 2025

Dear Russell Spencer MRTPI,

Request for an Environmental Determination by the Secretary of State for proposed diversions of West Winch Gas Feeders 2 and 4, land between West Winch and North Runcton

Thank you for your letter of 3 February 2025, in which you requested an environmental determination by the Secretary of State in accordance with Regulation 6 of the Public Gas Transporter Pipeline Works (Environmental Impact Assessment) Regulations 1999 (as amended) (“the 1999 Regulations”) on behalf of National Gas Transmission (“the Applicant”). This letter was supplemented with plans sufficient to identify the proposed works, as well as documents detailing the works to be undertaken, the predicted effects on the environment and mitigation to be put in place (“the Application”).

Development Description

The Proposed Development involves the diversion of two high pressure gas pipelines (Feeder 2 and Feeder 4) from their existing alignments, as shown on the Environmental Constraints Plan (dated 16/4/2024, ref. B2446A14). Feeder 2 would be diverted approximately 209m along a parallel route to the north of the current alignment, and Feeder 4 diverted approximately 207m along a parallel route to the south of the current alignment.

The diversions would involve:

- construction and use of a temporary site establishment area required during construction. Feeder 2 and 4 will have their own dedicated site establishment areas adjacent to the respective pipeline diversion construction works;
- construction of the two pipeline diversions using open cut trenching. Each diversion will be constructed with a protection slab protecting the pipeline diversion from both external construction loading and live traffic loading;
- removal of existing section of pipeline that will be abandoned due to the diversion; and

- site clearance of existing fencing, vegetation and topsoil.

The Proposed Development is required to facilitate the construction of the new West Winch Housing Access Road (WHHAR) scheme which is required as part of the West Winch Housing Allocation promoted by the Housing Allocation in the emerging Local Plan. The Environmental Impact Assessment Screening Report undertaken for the WHHAR scheme included the diversions of F2 and F4 and ecological surveys undertaken for that scheme have informed this Application. Works are expected to commence in early 2026 following the grant (if consented) of planning permission for the Access Road and are expected to take approximately 8-10 months to complete.

The Proposed Development falls within the administrative boundary of Kings Lynn and West Norfolk District Council. The F2 diversion is on agricultural land between the A10 and A47 and to the north of New Road, whilst the F4 diversion will take place within an agricultural field to the south of Chequers Lane. Access to the working areas at each location will be via existing field accesses and the use of temporary haul roads and compounds adjacent to the works areas. The land through which the pipelines will be diverted has been designated for permanent acquisition as part of the wider West Winch Housing Access Road works.

On completion of works the pipelines would be buried with no above ground permanent infrastructure. Land would be restored to its previous condition unless it is to form part of the Access Road scheme.

The Proposed Development does not meet the criteria in Part 1 of Schedule 3 of the 1999 Regulations. However, it is for a pipeline for which the design operating pressure will be over 7 bar gauge under Part 2 of Schedule 3 of the 1999 Regulations. Consequently, an environmental determination is required from the Secretary of State as to whether an Environmental Statement is required under the 1999 Regulations.

Consultation

Department for Energy Security and Net Zero officials on behalf of the Secretary of State held a virtual meeting with the Applicant in February 2024. The purpose of the meeting was for the Applicant to introduce the works to be undertaken prior to submitting a formal request for an environmental determination.

The Proposed Development affects one Local Planning Authority ("LPA"), Kings Lynn and West Norfolk Council. The Applicant engaged with the LPA prior to submitting a request for an environmental determination. The LPA consider (letter dated 12 August 2024, ref. 24/01082/SE) that for all effect pathways and receptors, effects would be temporary, localised and not significant. The LPA consider the Proposed Development is not EIA Development and raised no objection.

Natural England was consulted by the Applicant on 11 June 2024, and advised (letter dated 28 June 2024, ref. 479049) that there are no potential likely significant effects on statutorily

designated nature conservation sites or landscapes and also concluded that an Environmental Impact Assessment was not required.

Secretary of State's Considerations and Decision

The Secretary of State has considered all the information submitted, including the consultation response from the LPA. In considering the request and whether the Proposed Development is likely to have significant effects on the environment, the Secretary of State has had regard to Schedule 2 of the 1999 Regulations and particularly notes the following matters:

- The Proposed Development does not have the potential to affect nationally or internationally designated sites for nature conservation.
- A badger main sett and evidence of badger foraging activity was found within 500m north and northwest of the working area for the F4. It is likely that badgers will forage in the wider area, including the area of proposed works and site establishment and could therefore be impacted due to the temporary loss of foraging habitat or collision with construction plant. Pre-construction surveys will be undertaken within 30m of the proposed development works area. Works should be stopped and advice sought from a suitably qualified ecologist if evidence of badger setts or foraging activity are found.
- Ponds with evidence of great-crested newt (GCN) populations are located within 200m of the Proposed Development works area and access road. GCN of those populations may use the fields and other habitats of the work areas and access for foraging. This habitat would be temporarily impacted during construction and reestablishment. A pre-construction survey and finger-tip search of these areas must be undertaken by an experienced ecologist/ ecological clerk of works. Any GCN found would need to be relocated and there may be a need for temporary pitfall trap fencing and exclusion fencing. A licence would be required to implement these measures. The Secretary of State notes that the Applicant must comply with its ongoing duties¹ with regards to protected species and obtaining licences from Natural England where relevant, including under the Conservation of Habitats and Species Regulations 2017.
- There are several trees with bat roost potential immediately adjacent to the works area for F4. These could be disturbed from construction lighting, noise and any tree or hedgerow removal required.
- Several species of breeding birds of conservation concern may utilise the existing hedgerow and adjacent woodland habitat which will be impacted by direct hedgerow or tree removal or disturbance at F4. On 17 February 2025, the Secretary of State asked the Applicant to clarify the extent and timing of hedgerow and tree removal and any necessary avoidance or mitigation measures, to better understand the potential effects on breeding birds and bats utilising these habitats. On 12 May 2025, the Applicant responded that impacts to breeding birds would be avoided as vegetation clearance will occur from October 2025 to February 2026, outside the bird

¹ <https://www.gov.uk/guidance/wildlife-licences>

nesting season. Hedgerows will be reinstated as part of the main road landscaping plan. Construction of the WWHAR is scheduled from August 2026 to August 2028, with landscaping reinstatement expected in the latter half of the programme, subject to potential schedule changes. In addition, an Ecological Clerk of Works will inspect trees and hedges before clearance begins. If any nesting birds are found, work will be delayed to avoid disturbance.

- A pre-construction survey of any trees or hedgerows to be removed or potentially disturbed by the proposed works will be undertaken. Construction lighting will be positioned away from habitat identified as being used by bats, and the type of lighting will need to be sensitive to bats.
- There are two sensitive receptors for air quality within 200m of the Proposed Development. Vehicle movement could create dust nuisance if not appropriately controlled. There is potential for increase in traffic-related air pollution. However, increases in NO₂, PM₁₀ and PM_{2.5} annual concentrations are well below the standard of 40µg/m³ for ambient air quality, as specified in legislation. With embedded mitigation and considering the minimal increase in NO₂, PM₁₀ and PM_{2.5} annual concentrations, it is unlikely that either effect would result in significant impacts.
- As the Proposed Development is in close proximity to watercourses, mitigation is necessary to ensure water quality is not adversely affected by construction related runoff and contamination. Measures to be implemented include a Surface Water Management Plan and Sediment Management Plan, including the use of silt fences to avoid contamination.
- The Proposed Development is not located within the vicinity of any nationally designated (protected) heritage assets such as scheduled monuments, or registered parks and gardens. There are 8 listed buildings within 1km.
- Trial trenching undertaken in 2014 for the South-east King's Lynn Expansion Site in North Runcton found a Roman settlement and industrial site south-west of the A47. The heritage assessment undertaken for the WWHAR scheme assumed that there may be further archaeological evidence with the agricultural areas. As a consequence, the Proposed Development may directly affect below-ground archaeological resources. As part of the pre-construction works for WWHAR scheme, field evaluation in the form of trial trench will be undertaken in the areas of the Proposed Development. Mitigation is also proposed to limit excavation and soil stripping.
- There is one Public Right of Way (PRoW), RB3, passing through the working area of F4, which would need to be temporarily closed or diverted around the proposed area of works. Users of this route will experience negative temporary impacts. Due to the open aspect of the immediate area, the construction of the diversion would be highly noticeable from this route resulting in negative visual impacts to users of RB3 and of nearby open access land. The Proposed Development would have a temporary, short-term impact on the local landscape, which is already heavily influenced by noise and movement of traffic on the nearby A47 and A10.
- The wider WWHAR scheme will create new tree belts, new lengths of native hedgerow, some with native trees and scattered native trees, to provide visual enclosure and mitigate effects upon the setting of nearby residential properties and public rights of way within or in close proximity to the WWHAR scheme. Feeder 4

Option 1 includes provisions for a veteran tree to be retained and fenced off for protection in addition to a section of crown spread to be removed to facilitate construction activities. Whereas Feeder 2 Option 2 includes removal of six trees including one A grade tree.

- Overall, the Proposed Development could result in some minor adverse impacts during the 8-10 months construction programme. However, the impacts would be temporary and could be effectively avoided and mitigated, such that no significant residual effects are likely. The Applicant will ensure that the appointed main works contractor will prepare a Construction Environmental Management Plan and implement mitigation set out in the Application (Section 3.18 of the EIA Screening Report).

Taking account of the information submitted and having regard to Schedule 2 of the 1999 Regulations, the Secretary of State concludes that the documents provided and the opinion supplied by Kings Lynn and Norfolk Council are sufficient and that he can conclude that the Proposed Development **is not** EIA development as it is unlikely to have significant effects on the environment due to its nature, size, and location. This determination is dependent upon the implementation of appropriate mitigation measures identified in the accompanying application documents.

Should substantial changes occur to the design of the Proposed Development or any of the mitigation measures not be implemented, the conclusions of this environmental determination will be subject to review. This environmental determination shall cease to have effect after the expiration of 5 years from the date of issue, unless the Proposed Development has been substantially begun before the expiration of that period.

In accordance with Regulation 6(9), a copy of this letter has been sent to Kings Lynn and West Norfolk Council and published on the GOV.UK [Energy Infrastructure Development Applications: Decisions](#) webpage for information.

Yours sincerely,

Nicola Parker

Head of Environment Delivery
Energy Infrastructure Planning
Department for Energy Security and Net Zero