

Department for Energy Security and Net Zero
Energy Infrastructure Planning
55 Whitehall
London
SW1A 2HP

2 April 2026

BY EMAIL ONLY

Dear Secretary of State,

Project Union: East Coast (the Project)

Request for Section 35 Direction (Request)

Planning Act 2008 (the Act)

1. Introduction

- 1.1. National Gas Transmission PLC, hereafter referred to as National Gas, is writing to request that the Secretary of State for Energy Security and Net Zero grants a direction under Section 35 of the Planning Act 2008 (the Act) that the Project is of National Significance and is treated as an infrastructure proposal for which development consent is required pursuant to the Act.
- 1.2. This request constitutes a qualifying request for the purposes of the Act and compliance with the requirements of the Act are demonstrated below.
- 1.3. National Gas is promoting the Project, which includes the construction, operation and maintenance of up to 420 km of new pipeline and approximately 200 km of repurposed pipeline to distribute hydrogen to industrial hubs across the east coast of England.

2. The Applicant

- 2.1. National Gas is the owner and operator of Britain's National Transmission System (NTS) for gas, a vast network comprising approximately 7,800 km of high-pressure pipelines, over 60 compressors at 21 compressor stations, and more than 500 above ground installations. It transports gas from entry points to power stations, industrial facilities, storage sites, and local distribution networks, ensuring safe and reliable delivery across Britain.
- 2.2. National Gas is at the forefront of the UK's energy transition, actively developing the infrastructure essential for a low-carbon future. National Gas is leading efforts to

facilitate the energy transition by supporting the repurposing of infrastructure to transport low-carbon molecules.

3. Background

3.1. The Project is part of National Gas' wider Project Union Programme (the Programme), a hydrogen transmission network across Britain. The Programme would be approximately 2,500 km in length, comprising new infrastructure alongside repurposed sections of the existing NTS. The Programme is intended to power growth, protect and create jobs, and deliver energy security. It supports UK Government's ambitions for the development of a hydrogen pipeline network by 2035, enabling the UK to meet its Net-Zero target by 2050. The Project is the first part of the Project Union Programme.

4. Project Description

4.1. The Project would create an extensive hydrogen network stretching along the east coast of England, connecting key strategic locations recognised for their industrial strength and established infrastructure. Early engagement undertaken with potential customers and stakeholders as part of the Pre-FEED stage (completed in September 2024), provided an understanding of customers' future needs for methane and hydrogen. This engagement identified the following strategic locations for hydrogen production, demand, and storage:

- Teesside;
- The Humber region; and
- The East Midlands.

4.2. The East Coast region, comprising the strategic locations listed above, is dense with industrial sites, power stations and large-scale gas storage facilities. It has some of the UK's most advanced decarbonisation plans for industrial clusters. The Project will provide the strategic infrastructure required to enable decarbonisation of the Region through the transition to hydrogen. It will integrate production, demand and storage capacity for greater flexibility, resilience and network connectivity, and will underpin the development of a national hydrogen supply chain

4.3. The Project would consist of both repurposed and newly constructed pipelines, designed to connect the identified strategic locations set out above. This network would be supported by Above-Ground Infrastructure sites (AGIs), which comprise infrastructure required in places along the pipeline to facilitate connection and/or provide maintenance points. In key industrial areas, strategically placed AGIs (hereafter referred to as Hub AGIs) would serve as termination points for the hydrogen pipeline network from which spur pipelines would extend to Customer Connection Points (CCPs). Placement of Hub AGIs will be optimised through routing analysis and spur length considerations. This configuration ensures efficient service across the strategic locations across the East

Coast region. The Hub AGIs are anticipated to be situated in proximity to the following areas; however, the precise locations will be determined as the Project advances:

1. Bishop Auckland;
2. Wilton Green;
3. Towton;
4. Asselby;
5. Newbald;
6. Catwick;
7. Keadby;
8. West Butterwick;
9. Brigg;
10. Goxhill;
11. Kirmington;
12. Hatton; and
13. Staythorpe.

Figure 1 shows an indicative route across the strategic locations informed by emerging route development.



Figure 1- Project Union: East Coast

The Proposed Development

- 4.4. The Project would consist of the following Proposed Development, which would constitute the NSIP:
- The construction, operation and maintenance of new mainline pipeline. In key locations on the mainline pipeline route, new AGI will serve as ‘Hub AGIs’ which will act as terminal points where the spur pipeline network connects to the mainline.
- 4.5. Elements that would form part of the Project, but would be considered as Associated Development to the above NSIP:
- Other AGIs, including block valves and compressor stations, would be required to control the flow and pressure of hydrogen at critical points along the proposed pipelines. The exact number and locations of these AGIs are still to be confirmed.
 - New spur pipelines originating from the Hub AGIs, providing direct connections to CCPs.
 - Works associated with the repurposing of approximately 200 km of natural gas pipeline for the transportation of hydrogen.
 - Local diversions of existing natural gas pipelines, where required.
- 4.6. To enable the Project’s construction, it would likely be necessary to divert or modify third-party utility services. Additional land would also need to be set aside to support environmental mitigation measures and to achieve Biodiversity Net Gain (BNG).
- 4.7. In addition to the permanent infrastructure, temporary land would be required throughout the construction phase. This would accommodate essential activities such as the movement and storage of construction equipment and machinery, provision of site offices, welfare facilities, storage areas and the creation of temporary access routes for construction purposes.

Routing

- 4.8. The routing for the Project has been developed through strategic optioneering, using digital tools, constraints mapping and on-going technical, cost and environmental studies to develop emerging preferred routes.
- 4.9. The preferred routes are currently being taken forward to the next stage of development. This involves the identification of a Preferred Route Corridor, which indicates a more likely location for the new build pipelines for the Project.

Environmental Impact Assessment

- 4.10. The Proposed Development for the Project will require an Environmental Impact Assessment (EIA) as it will comprise Schedule 1 development under Schedule 1,

Paragraph 16 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017.

- 4.11. The Applicant will undertake EIA Scoping, with a scoping request to be submitted to The Planning Inspectorate in November 2026 [current programme estimate], in accordance with Regulation 10 of The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017.

Timeline

- 4.12. The key timeline for the delivery of the Project, which may be subject to change, is currently as follows:

- Consultation: September 2026
- Scoping: November 2026
- DCO Submission: December 2028

However, the Project may be delivered in phases, in which case the above timelines would apply to the first phase.

5. The Request

- 5.1. National Gas request that the Secretary of State directs pursuant to Section 35(1) of the Act that the NSIP part of the Proposed Development, set out in paragraph 4.4 of this letter be treated as a development for which development consent is required as the Proposed Development is of national significance as part of the Project.

- 5.2. We request that the direction issued by the Secretary of State confirms, pursuant to Sections 35ZA(3)(b) and 35ZA(5) of the Act, that:

- all provisions of the Act apply fully to the Project;
- the energy National Policy Statements (NPS) EN-1 apply to the Project and that any application should be determined in accordance with Section 104 of the Act;
- to the extent that any consultation carried out by the Applicant prior to the date of a Section 35 direction complies with the requirements of Part 5 of the Act (or any legislation made under that Part), those consultation requirements shall be treated as having been complied with notwithstanding that the consultation was carried out prior to the date of the direction; and
- the Project may be brought forward in one phase under one application for development consent or in two or more phases under two or more applications for development consent which would authorise different parts of the Proposed Development (i.e. different parts of the NSIP, together with the relevant associated development for that part) at different times.

6. Reason for the Request

- 6.1. The Project delivers a critical component of the Government’s hydrogen and decarbonisation ambitions. Section 4 underscores the strategic significance of the East Coast region, noting its concentration of industrial sites and substantial gas storage capacity. The East Coast region will serve as a cornerstone for decarbonising the United Kingdom by facilitating the transportation and supply of hydrogen to various demand centres.
- 6.2. Under Section 31 of the Act, development consent is required where infrastructure proposals are, or form part of, an NSIP. Under Section 14(f) of the Act, a project which consists of the construction of a pipeline by a gas transporter (where the requirements of Section 20 of the Act are met) is an NSIP. National Gas as the holder of a gas transporter licence, is a gas transporter for the purposes of the Act.
- 6.3. As National Gas is a ‘gas transporter’ Section 21 (Other Pipelines) of the Act does not apply to the Project, as this only applies to pipeline developments where the promoter is not a gas transporter.
- 6.4. Section 20 of the Act states that the construction of a pipeline by a gas transporter is an NSIP within section 14(1)(f) of the Act if, when constructed, each of the following conditions are expected to be met:

Table 1 - Section 20 Compliance

Section 20 (PA2008)	The Project
The pipeline must be wholly or partly in England [Criterion 1].	The Project would fall wholly within England and therefore meets criterion.
Either the pipeline must be more than 800 millimetres in diameter and more than 40 kilometres in length. Or the construction of the pipeline must be likely to have a significant effect on the environment [Criterion 2].	The Project would exceed the criteria for pipeline length and diameter as the new build element would be more than 40 km in length and would have a diameter of more than 800mm. It is considered likely that there will be significant environmental effects resulting from the Project.
The pipeline must have a design operating pressure of more than a 7-bar gauge, or [Criterion 3].	The new build pipeline would have an operating pressure of more than 7 bar gauge.

Section 20 (PA2008)	The Project
The pipeline must convey gas for supply (directly or indirectly) to at least 50,000 customers, or potential customers, of one or more gas suppliers [Criterion 4].	The number of customers that the Project would serve has not been confirmed at this stage but the estimated number of customers would be less than 50,000.

- 6.5. Whilst the Project will meet three of the four criteria set out in Section 20 of the Act, it currently cannot be confirmed that it would serve at least 50,000 customers, or potential customers. A Section 35 request is therefore necessary to enable the Project to be authorised by the DCO regime.
- 6.6. Due to the linear configuration of the Project, it is anticipated that National Gas may require compulsory purchase powers to enable the acquisition of land and rights over land necessary for the delivery of the Proposed Development.
- 6.7. Furthermore, the Project would require multiple planning applications across different local planning authority areas. In addition to securing planning permission, it is expected that National Gas will need to obtain a variety of other consents and approvals from relevant consenting bodies. The Project would benefit from a streamlined consenting process, whereby all aspects are considered by a single consenting authority, thereby ensuring consistency in assessment and programme.
- 6.8. A section 35 direction would also enable the Project to take advantage of the definitive timelines mandated by the DCO consenting process, thereby mitigating the risk of avoidable delays in delivery.
- 6.9. Given these considerations, the intention of the Act and the NSIP regime is to encompass and facilitate the delivery of infrastructure projects similar in scope and significance to this Project.

7. Associated Development Status

- 7.1. Certain works may be considered ‘associated development’ under Section 115 of the Act. Government guidance on what constitutes associated development for the purposes of the Act is provided in the “Planning Act 2008: associated development applications for major infrastructure projects” (26 April 2013) (the AD Guidance).
- 7.2. Paragraph 8 of the AD Guidance states that applicants can decide whether to include elements that may be viewed as associated development within a DCO application or seek consent through alternative procedures. This allows applicants discretion regarding whether to pursue associated development through the DCO process. Paragraph 5 of the AD Guidance identifies four core principles for “associated development”. These are that it should have a direct relationship with the “principal development”; be subordinate to it; be necessary for reasons beyond generating additional revenue and be proportionate to the nature and scale of the principal development.

7.3. Examples of associated development within the Project scope includes AGIs (excluding Hub AGIs), new spur pipelines, works associated with repurposing and any local diversions of existing natural gas pipelines. These elements form part of the proposed development, as set out in paragraph 4.4, and meet the four core principles of associated development.

8. Qualifying Request

8.1. The Request is a qualifying request for the purposes of Section 35ZA(11) of the Act.

8.2. For the purposes of Section 35 of the Act, National Gas confirm that the Project:

- forms part of a project (or proposed project) in the field of energy and so satisfies the condition in Section 35(2)(a); and
- will (when completed) be wholly in England and so satisfies the condition in Section 35(2)(b).

8.3. For the purposes of Section 35ZA(1) of the Act, National Gas confirm that no application for a consent or authorisation mentioned in section 33(1) or (2) has been made in relation to the Project which the Request relates.

8.4. Under Section 35(2)(c), the Secretary of State must consider the Project, alone or with related energy projects, to be of national significance. We also set out below why the Project is of national significance

8.5. Given the Project is of national significance, receiving a Section 35 direction pursuant to this request would provide National Gas with more certainty around the delivery programme, which is necessary for a project of this scale and nature.

9. National Significance

9.1. The Government has prioritised developing a low carbon hydrogen economy to support decarbonisation and create green growth clusters in traditional industrial areas. The Project is part of the larger Project Union Programme and will help advance the Government's goals and legal commitments to achieve Net Zero by 2050.

Policy Objectives

9.2. The Project would be a vital part of the UK's strategy for developing a low-carbon hydrogen economy to meet net zero emissions by 2050. This would align with government policies such as the UK Infrastructure: A 10 Year Strategy, the Clean Power 2030 Action Plan, the UK Hydrogen Strategy, Hydrogen net zero investment roadmap and the British Energy Security Strategy. However, while the Project contributes to the direction of the vision within the Clean Power 2030 Action Plan and is essential to long-term clean power growth, it does not fully align with the Plan's delivery timeframe, as the Project is expected to become operational after 2030.

- 9.3. Moreover, the Hydrogen transport and storage networks pathway¹, published in December 2023, signified the intention for the Government to support up to two hydrogen storage projects and associated regional pipeline infrastructure to be in operation or construction by 2030.
- 9.4. The Hydrogen strategy update to the market² (July 2025) recognises the importance low carbon hydrogen as essential to achieving net zero and delivering the Government's Clean Energy Superpower and Growth Missions.
- 9.5. NPS EN-1, specifically paragraphs 3.4.12 to 3.4.23, establishes hydrogen distribution, pipelines and storage, (such as the Project) as a critical national priority (CNP) in order to support the urgent need for low carbon hydrogen infrastructure. Paragraph 3.3.49 also sets out that low-carbon hydrogen is essential to achieve the government's Clean Energy Superpower and Growth Missions and will be a crucial part of our future energy system.
- 9.6. NPS EN-4 is the NPS for Natural Gas Supply Infrastructure and Gas and Oil Pipelines. It recognises that clean hydrogen, and the infrastructure that supports it, will be needed to help transition our energy system to net zero by 2050, with the potential to help decarbonise vital UK industry sectors.
- 9.7. The Project will support major targets, including up to 10GW of low-carbon hydrogen production by 2030 and significant reductions in greenhouse gas emissions, by enabling industry decarbonisation and reliable energy storage. The Project's infrastructure links hydrogen production to industrial end-users, making it essential for achieving national climate and energy objectives.

10. Local Planning Authorities

10.1. The following Local Planning Authorities (LPAs) have been identified as likely to be host authorities of the Project:

- North East:
 - Durham County Council;
 - Darlington Borough Council;
 - Hartlepool Borough Council;
 - Middlesborough Council;
 - Redcar and Cleveland Borough Council; and
 - Stockton-on-Tees Borough Council.
- Yorkshire:
 - East Ridings of Yorkshire Council;
 - Hull City Council;
 - Leeds City Council;
 - North Yorkshire Council; and

¹ [Hydrogen transport and storage networks pathway - GOV.UK](#)

² [Hydrogen update to the market: July 2025 - GOV.UK](#)

- Wakefield District Council.
 - Lincolnshire:
 - East Lindsey District Council;
 - Lincolnshire County Council;
 - North Lincolnshire Council;
 - North East Lincolnshire Council; and
 - West Lindsey District Council.
 - Nottinghamshire:
 - Bassetlaw District Council;
 - Newark and Sherwood District Council; and
 - Nottinghamshire County Council.
- 10.2. These LPAs have been contacted or are in the process of being contacted by National Gas about the Project. Where appropriate, National Gas will enter into Planning Performance Agreements with these LPAs.

11. Conclusion

- 11.1. The Project is a key component of the broader Project Union Programme and falls under the Government's industrial decarbonisation plan. The Project is nationally significant, as set out in section 6 and 7 of this request, and will help advance the Government's goal of making Britain a clean energy superpower. The Project is nationally significant due to its scale and nature and on the basis that it only narrowly misses meeting all the criteria for a nationally significant project under s.20 of the Act. Advancing the Project under the Act would create a unified consent process with a set timeline, eliminating the need for multiple consents and approvals to be sought. It would also allow the necessary land and acquisition rights to be sought simultaneously. This would ensure that the Project would benefit from the firm timescales for the consenting of a project pursuant to the Act.
- 11.2. Additionally, assessing the Project comprehensively through a single process and decision maker will reduce duplication and ease the workload on local planning authorities. This process will simplify and strengthen the evaluation of potential environmental considerations.
- 11.3. We request that the Secretary of State directs pursuant to Section 35(1) of the Act that the proposed development for the Project, as set out in paragraph 4.4 of this letter, be treated as a development for which development consent is required and that the other directions in relation to the application of National Policy Statements that we have set out above are made.

Yours sincerely,



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