



Department for
Energy Security
& Net Zero

Energy Infrastructure Planning
Department for Energy Security and
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By email: Sophie.Phillips@nationalgas.com

Sophie Phillips
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Dear Sophie Phillips,

REQUEST FOR AN ENVIRONMENTAL DETERMINATION BY THE SECRETARY OF STATE UNDER THE PROVISION OF REGULATION 6 OF THE PUBLIC GAS TRANSPORTER PIPELINE WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 1999 (AS AMENDED) (“THE 1999 REGULATIONS”).

National Gas – West Import Resilience Project – Request for an Environmental Determination.

Thank you for your letter of 04 March 2026 and supporting documentation (“the Application”), 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”).

Development Description and Background

This request for a determination under the 1999 Regulations follows a previous environmental determination request made in 2020 for a similar project, known as the Western Gas Networks Upgrade. This previous scheme was determined by the Secretary of State, in a decision letter dated 17 December 2020, not to constitute EIA development.

We note that National Gas is seeking a new environmental determination based on updated survey work undertaken since 2020 as the previous determination has now expired.

The Proposed Works are referred to as the West Import Resilience Project (WIRP), which seeks to upgrade existing underground gas pipeline infrastructure to accommodate the increased gas flows between South Wales and Worcestershire.

The Proposed Works do not meet the criteria in Part 1 of Schedule 3 of the 1999 Regulations (descriptions of pipeline works in respect of which an ES is required). However, the design operating pressure of the pipeline will be over 7 bar gauge and therefore satisfies the criteria under Part 2 of Schedule 3 of the 1999 Regulations (descriptions of pipe-line works in respect of which an ES may be required). Consequently, an environmental determination is needed from the Secretary of State as to whether the Proposed Works are EIA development under the 1999 Regulations.

The submitted Environmental Determination Report (EDR) details the options appraisal process which was used to determine the best strategic proposal to deliver the WIRP. A total of 71 potential strategic options were identified, and 11 options were shortlisted for options appraisal.

It is noted that, after completion of the options appraisal process (which considered technical, environmental and socio-economic topics) the preferred strategic proposal was identified, and the Proposed Works comprise the following:

- Construction of approximately 9km of new pipeline between Wormington Compressor Site and Honeybourne AGI and approximately 2km of new pipeline between Churchover Compressor Site and Churchover Multi-junction.

A further review was undertaken by National Gas in 2024 including a cost-benefit analysis, which confirmed that the preferred option continues to deliver the greatest overall benefit.

Consultation

The Proposed Works affects four Local Planning Authorities (LPAs), Wychavon District Council, Tewkesbury Borough Council, Cotswold District Council and Rugby Borough Council. The LPAs were consulted as per Regulation 6(2)(b) of the 1999 Regulations on 18 March 2026. Each of the LPA responses have been summarised below.

Rugby Borough Council (RBC) responded on 02 April 2026 confirming:

“This report has been reviewed. It is noted that the project is largely the same as that considered in September 2020 where it was determined the project was not EIA development. The EDR has been updated to reflect the current site boundary. The Council previously commented on the 2020 report and carried out a screening opinion, these documents are attached. Although the National Planning Policy Framework has been updated since the previous comments the general principles and planning matters remain

the same. It is therefore considered that the 2020 documents remain relevant. It is considered that the development does not constitute EIA development as per the 2020 comments.”

RBC’s 2020 response stated the following:

“Given that the pipes are beneath the ground within an area of open countryside where existing pipes exist, following the same trajectory, that the site is not in a sensitive location, there is unlikely to be a significant effect on the environment as long as the land is restored to open countryside following installation, and that any development which is not permitted development (such as works outside of operational land) is subject to planning permission. In my view the proposed development is not an EIA development.”

Tewkesbury Borough Council (TBC) responded on 15 April 2026 confirming:

“I can confirm that, based on the information submitted, the Local Planning Authority is of the opinion that the submission of an Environmental Statement in connection with this development at this time is not required.

The Local Planning Authority has taken into account the size and nature of the proposed development, the location of the potential development site and the likely impact of the proposal on the character and appearance of the area, the potential increase in traffic, the potential effects on biodiversity, heritage assets, trees, hydrology (including flood risk), land contamination, noise and air quality, and the potential socio economic implications of the development including cumulative impacts on the local area.

There are no statutory designated sites or areas of ancient woodland within the study area of Wormington Compressor to Honeybourne pipeline. Expect up to date survey results to be presented in an Ecological Impact Assessment, to ensure that any ecological features associated with the sites are identified, potential impacts from the proposed works are fully assessed and appropriate mitigation and enhancements are proposed.”

Wychavon District Council (WDC) responded on 20 May 2026 confirming:

“the Project does not constitute EIA development.”

Cotswold District Council (CDC) did not respond to the consultation, however CDC did respond to the previous screening request in 2020, concluding that the proposals were not EIA development.

Secretary of State’s Consideration

The Secretary of State has considered all the information submitted, including the consultation responses received from Local Planning Authorities. In considering the request and whether the Proposed Works is likely to have significant effects on the environment, the

Secretary of State has had regard to Schedule 2 of the 1999 Regulations (matters to be taken into account in making an environmental determination) and particularly notes the following:

- The Proposed Works comprise a new 11km pipeline which is expected to be 900mm in diameter and approximately 75Barg operating pressure.
- The EDR has considered the potential for cumulative effects in combination with other relevant projects.
- There are no areas classified or protected under national legislation, including Special Areas of Conservation, Special Protection Areas, Ramsar sites, Sites of Special Scientific Interest, National Nature Reserves, Local Nature Reserves or areas of ancient woodland, within or in the vicinity of the proposed pipe-line works, and no pathway for significant effects beyond the red line boundary has been identified.
- A Construction Environmental Management Plan (CEMP) will be prepared and implemented to mitigate potential temporary construction impacts. No significant effects are anticipated in relation to natural resource use or waste generation.
- Gloucestershire County Council (GCC) Highways, who were consulted as part of TBC's response, raised concerns on the amount of vehicle movements which will be generated by the construction phase, commenting "*submitted information indicates that the construction phase would generate up to approximately 668 two-way vehicle movements per day, including substantial proportion of HGVs, over a protracted construction period of approximately 42 months.*" As detailed within the Applicant's EDR, a Traffic Management Plan (TMP) will also be prepared, setting out detailed arrangements for construction traffic and potential impacts on the local highway network.
- The TMP will provide a framework for managing vehicle movements to and from construction compounds and along the working corridor, ensuring construction traffic operates safely and in accordance with highway authority requirements. The TMP will be developed in consultation with the relevant local highway authorities and implemented throughout construction as a live management document. Furthermore, TBC acknowledge the Highway Authority's comments within its screening opinion and note that the short-term nature of the construction phase project could be appropriately managed.
- TBC note that in terms of landscape and visual, the construction phase of the project would be visible to residents and visitors, and users of the Public Right of Way network that crosses the routes of the pipeline. The TBC concludes that these effects would be temporary and limited to the construction phase, with the area restored and reinstated following completion, resulting in no long-term visual effects. The Secretary of State notes that the EDR refers to the CEMP, which would include measures such as minimising vegetation loss and the use of mobile hoarding where necessary, and is therefore satisfied that the landscape and visual effects would be temporary and not likely to be significant.
- The EDR notes that a programme of archaeological investigations has been undertaken in consultation with the County Archaeologist. It concludes that further pre-construction investigations would ensure that no likely significant effects on

archaeological resources would arise from the temporary construction compounds, new pipeline, or tie-in works. Any additional mitigation measures would be secured through the CEMP.

- No constraints were identified in relation to the capacity of the natural environment to accommodate the development, subject to the completion of all necessary ecological and species surveys. While certain watercourses within the study area are hydrologically connected to the wider river catchment, no qualifying features associated with international designations are present within or adjacent to the proposed works and no pathway for significant effects has been identified.
- A Construction Environmental Management Plan (CEMP) will be prepared and implemented to mitigate potential temporary construction impacts. No significant effects are anticipated in relation to natural resource use or waste generation.

Conclusion

Taking account of all the information submitted and having regard to Schedule 2 of the 1999 Regulations, the Secretary of State concludes that the documents provided with your letter of 04 March 2026, and the opinions supplied by the LPAs are sufficient.

He concludes that the Proposed Development **is not** an EIA development as it is unlikely to have significant effects on the environment due to its nature, scale, location and proposed mitigation measures. 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 invalid and new environmental determination request would be required.

The Secretary of State's decision is on the basis that appropriate mitigation would be put in place, in particular:

CEMP

A CEMP must be prepared which is approved by the relevant authorities and should include, but not be limited to, the following measures:

- Standard water management measures such as minimising the loss of existing vegetation and the use of mobile hoarding where necessary. Additionally, detailed mitigation must be identified, where appropriate, and specified within the CEMP.
- Air quality controls based on advice provided in the IAQM's 'Assessment of dust from demolition and construction 2014'.
- Measures that commit to reinstatement to the previous condition or enhancement of the land as well as mitigation measures following outcome of ecological surveys.
- Details of soil storage and how this complies with the Code of Practice for the Sustainable Use of Soils on Construction Sites, Defra 2011).

Traffic Management Plan (TMP)

A Traffic Management Plan (TMP) must be prepared which is approved by the relevant authorities and should include, but not be limited to, the following measures:

- Traffic management measures including an estimate of the number and types of vehicle movements generated by construction activities on a daily basis over the construction programme, taking into account all stages involved in the construction works, the machinery involved and the labour requirements.
- Details of construction routes and access to the site, along with a description on the existing highway network, public transport, cycle and walking facilities and potential receptors.
- Access route inspection and swept path analysis for the largest equipment.
- The TMP would be a live document, managed and monitored by a suitably qualified Construction Logistics Manager, and would be prepared in consultation with the relevant local and highway authorities.

A copy of this letter has been sent to the four LPAs and published on the GOV.UK [Energy Infrastructure Development Applications: Decisions](#) webpage.

Yours sincerely,

Claire Rannard

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