



TECHNICAL APPENDIX 6.2: SCOPING OPINION

Our Ref: ENQ/2023/1465

Your Ref:

[REDACTED]

[REDACTED]

[REDACTED]

Dear Sir/Madam

- 1.1 I refer to your consultation in respect of a Scoping Request for the above proposal received on 17 October 2023. I am in receipt of all necessary information and can now offer a response to this consultation under Regulation 17 of The Town and Country Planning (Environmental Impact Assessment) (Scotland) Regulations 2017 (the Regulations). Your request sought advice relating to the content of a future environmental assessment with a scoping report and appendices provided for consideration.
 - 1.2 Regulation 17(2) outlines the information required in order to adopt a Scoping Opinion, namely a description of the location of the development; a description of the nature and purpose of the proposal and the likely environmental impacts; and any other information the developer wishes to provide. It is considered that sufficient information has been submitted in order to satisfy Regulation 17(2).
 - 1.3 Schedule 4 of the Regulations states the information which should be included in the EIA report and should form the basis for your submission. In order to make an assessment of the above information there are specific criteria and guidance set out in Schedule 4 of the Regulations. In particular, these include a description of the characteristics of the development and any reasonable alternatives considered and the reasons for the chosen proposal. Environmental issues are obviously of key importance with a description of factors listed in the regulations likely to be significantly affected by the development required. Detailed survey work would be required to inform the EIA Report. Following analysis of the aspects of the environment which would likely be significantly affected, a detailed assessment of the effects themselves would be required along with mitigation measures proposed.
 - 1.4 Please note this is an updated response which includes consultation responses from Waste Management and Landscape which were previously outstanding. This supersedes the response sent on 20 December 2023.
- 2.0 Response Overview
- 2.1 Having reviewed the submitted documentation the Planning Service generally agrees with the proposed scope of the EIA in relation to those aspects which may impact

upon the Aberdeenshire Council Area should all consultee comments be addressed. However, there are issues to be considered further within the Consultee Responses below, most notably from Historic Environment Scotland. All responses are summarised below and appended to this response. Where responses have not been received to date, they will be forwarded to you once received.

3.0 Site Description, Approach to consenting and EIA Methodology

3.1 The site description and characteristics of the development have been satisfactorily identified within the Scoping Report.

3.2 The EIA Methodology outlined within the Scoping Report (October 2023) (SSEN) appears to be typical for a development of this type and is considered acceptable.

4.0 Internal Consultee Responses

Environment and Infrastructure Services – Archaeology advises that the proposed methodology and scope of the assessment outlined in Section 7 of the Scoping Report is considered to be acceptable.

Environment and Infrastructure Services – Built Heritage notes that the proposal does not raise immediate concerns with respect to impact on the historic built environment but indicative elevation drawings outlining the scale of the proposed structures to evaluate their potential impacts on listed buildings located in and around Longside to allow an informed decision on whether it will align with Policy 7 of NPF 4 and Section 11 of the ALDP.

Environment and Infrastructure Services - Environmental Health note that the applicant advised that a BS4142 assessment will be undertaken. Given the low level background noise levels, in addition to this assessment, the noise level should be assessed against the NR20 curve criterion for internal noise levels at night. The NIA should also taken into account any cumulative impact from other sites and compare against NR20 internal noise curve.

A dust management plan should be provided if significant groundworks are being undertaken to protect residential amenity.

Consideration should be given to the potential risk of contamination or disruption to nearby private water supplies (PWS) with a risk assessment undertaken to ensure the quality and quantity of any PWS is not negatively impacted.

Environment and Infrastructure Services - Environment Team (Natural Heritage) note that the range of surveys carried out and proposed further assessments are acceptable. Habitats and some species scoped out of further assessment are accepted. It is noted that the Buchan Ness to Collieston SAC/SPA is to be scoped out of further assessment and that a separate HRA Screening report will be prepared; this appears acceptable but Nature Scot would be more competent to advise on this.

In relation to opportunities for biodiversity enhancement, it is noted that a biodiversity net gain assessment is to be carried out. It is expected that any loss of semi-natural habitats will be compensated for through this process.

Environment and Infrastructure Services - Flood Risk and Coastal Protection has been involved in ongoing discussions with the agent and SEPA regarding the potential flooding and drainage issues on site, therefore have nothing additional to request within the EIA.

Environment and Infrastructure Services - Roads Development note that discussion is ongoing in relation to the proposal. See appended response for full details. Specifically, in regard to Chapter 8, there are no issues or concerns with the content or proposed methodology. It is suggested that the following roads are also included in the list of roads to be considered (Section 8.5.1):

- A950 between the proposed development site and Longside, as well as through Longside and Mintlaw;
- The U55b unclassified road to the south of the development.

If it is considered there will be minimal or no impact upon the above roads and settlements, sufficient justification would be required.

Environment and Infrastructure Services – Waste Management has no comment on the proposal at this time.

5.0 External Consultee Responses

Carol Anderson Landscape Associates has welcomes the consideration that is being given by the landscape consultants to mitigation and will review more detailed proposals, including wider off-site measures, when available.

Health and Safety Executive has identified consultation zones of a number of pipeline operators and recommend they are consulted as part of the consideration of the development.

Historic Environment Scotland welcomes that the potential cultural heritage effects are scoped into the EIA, however the proposed scope of assessment is not sufficient for the needs of this consultee as it is proposed to scope out impacts on the setting of designated cultural heritage assets. It is considered that the proposals have the potential to affect a number of cultural heritage assets within the remit of HES, and therefore recommend that any EIA undertaken in support of the proposal should include a full assessment of impacts on the historic environment. Further detail of the approach required is noted within 'Managing change in the historic environment: setting' guidance.

The full consultation response confirms there are no notable assets of national importance within the site boundary.

It is highlighted that careful consideration be given to reducing and avoiding impacts on the setting of cultural heritage assets during the design process. Clarification is required as to the 1km study boundary is proposed for cultural heritage, noting that 3km is used elsewhere in the scoping document. A ZTV is requested along with a robust assessment and appropriate visualisations for relevant assets with long distance views which form part of their cultural significance. Visualisations are also requested from Cairn Catto, long cairn along with Old Parish Church of Longside, looking towards the development.

The full consultation response notes the issues scoped out and agrees that indirect impacts on assets during construction and operation can be scoped out. It is also agreed to scope out direct impacts during construction and operation on World Heritage Sites, Marine Protected Areas, Gardens and Designed Landscape and Inventory Battlefields.

It is disagreed to scope out the Old Parish Church of Longside from further assessment and also direct impacts during construction and operation on scheduled monuments.

The developer should refer to the full consultation response for further detail.

INEOS consider the safe operation or integrity of the pipeline will not be affected the by the proposed development and has no relevant information that would assist in the EIA screening, or any comment on the scoping report.

Nature Scot agree with the proposal approach for baseline collection and consider the range of ecological surveys will be sufficient and appropriate to inform the assessment of environmental effects. The list of issues to be scoped out and the rationale behind the decision is agreed. This includes scoping out protected areas designated for nature conservation.

National Gas note that an assessment has been carried out with respect to National Gas Transmission PLCs apparatus and the proposed work location and is found to be within a high risk zone. Further assessment from Asset Protection is required and full comment (holding objection) is provided in the attached response.

Shell U.K. Limited raises areas of concern in relation to Shell pipelines and would be pleased to meet with the developer to ensure any risk is reduced to as low as reasonably possible. Areas of particular concern are:

- The development does not encroach into the pipeline servitude,
- Potential pipeline crossing during construction,
- The risk of AC and DC induced interference affecting the integrity of the pipelines.

Scottish Environment Protection Agency agree and welcome the impact on existing water environment including wetlands, flood risk and any existing ground water abstractions are scoped into the EIA. Further comment on these issues are included in the full response attached and should be addressed and included in the EIA/supporting information to avoid delay and potential objection to any planning application. This consultee would welcome further pre-application engagement once further studies/assessments have been undertaken.

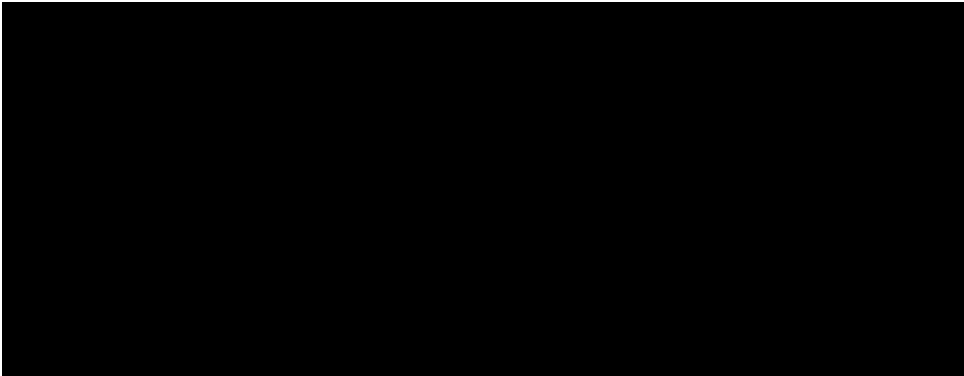
Scottish Gas Network has provided detail of assets within the area. No comment in relation to the scoping report has been provide.

Scottish Water note that the proposal falls within a drinking water catchment where a Scottish Water abstraction is located. It is welcomed that reference has been made to this catchment and should be noted in the documentation. Full response also includes notes for the developer for reference.

Transport Scotland has no comment at this stage, as it is outwith the scope of consultation with this consultee.

6.0 Conclusion

- 6.1 I hope the above information is of assistance as a formal scoping opinion in respect of the relevant EIA Report. During the processing of any associated planning application other issues may become obvious following public consultation and consultations with statutory consultees.
- 6.2 This opinion will be held for public inspection for a two-year period, or until a planning application is submitted at which time the opinion will be transferred to the planning register with the application.



List of Consultees

Aberdeenshire Council

Aberdeenshire Council – Environment and Infrastructure Services, Archaeology

Aberdeenshire Council – Environment and Infrastructure Services, Built Heritage

Aberdeenshire Council – Environment and Infrastructure Services, Environmental Health

Aberdeenshire Council – Environment and Infrastructure Services - Environment Team (Natural Heritage)

Aberdeenshire Council Environment and Infrastructure Services - Flood Risk and Coastal Protection

Aberdeenshire Council, Environment and Infrastructure Services - Roads Development Health and Safety Executive

Historic Environment Scotland (HES)

NatureScot

Scottish Environment Protection Agency (SEPA)

Scottish Water

Transport Scotland

Shell

INEOS

National Gas Transmission

Scottish Gas Network



ENQ/2023/1465

**EIA Screening/Scoping Opinion for Scoping Opinion for National
Development for Erection of Energy Hub at Netherton Hub, Land To West Of
Parkhill Farm, Blackhills, Peterhead
Grid Reference: 405430.846013**

Dear ,

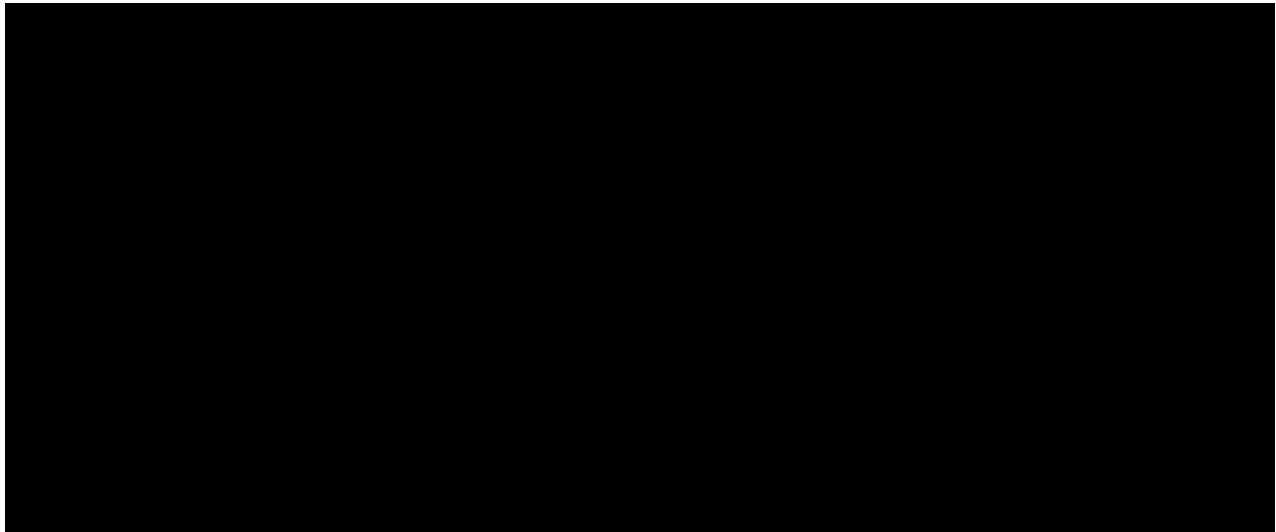
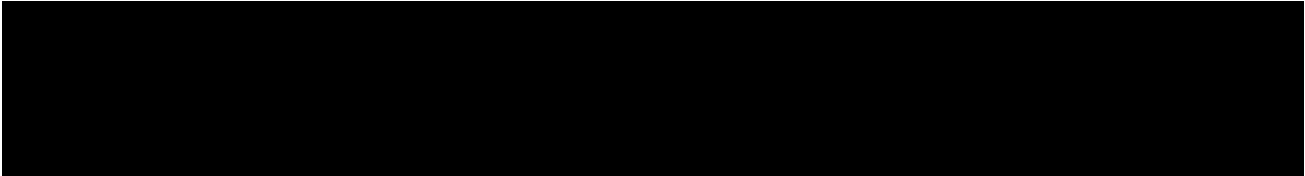
Thank you for consulting us on the above Scoping Opinion. Having received and reviewed the submitted information, I can confirm that I agree with the Proposed Scope of Assessment and the issues scoped out as outlined in section 7 (Cultural Heritage) of the EIA Scoping Report.

The above comments apply to the current enquiry only.

Should you have any comments or queries regarding the above, please do not hesitate to contact me



Archaeology Service, Planning and Economy, Environment and Infrastructure Services
Aberdeenshire Council



Consultee Comments for Planning Application ENQ/2023/1465

Application Summary

Application Number: ENQ/2023/1465

Proposal: Scoping Opinion for National Development for Erection of Energy Hub

Comments

It was pointed out that in the previous enquiry for this site (ENQ/2023/0426) that setting can be important in the way historic cultural assets are experienced and appreciated by the wider population. The Planning Service must therefore take into account the backdrop of conservation areas, designed landscapes and listed buildings when evaluating the potential impact of any future development. The overriding premise is to ensure that any proposal does not undermine important views of a nationally designated historic asset or impinge on their immediate surroundings.

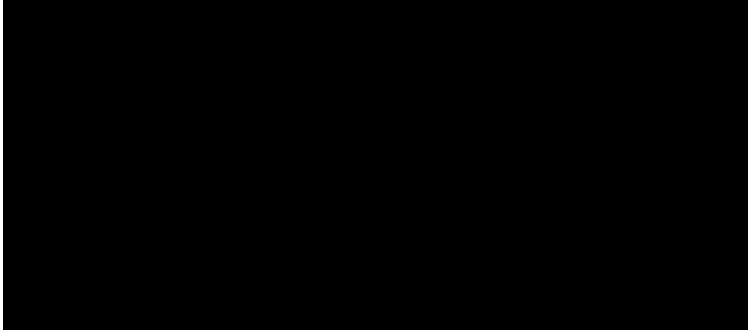
The Built Environment Team initial assessment stated that the development of the identified site should not undermine the setting of any listed building, conservation area or designed landscape within the immediate vicinity of site. This assessment was based on the evaluation of the surrounding landform along with the distance of the development site from nearby historic assets. Nevertheless, it was suggested that it would be beneficial to obtain indicative elevation drawings outlining the scale of the proposed structures to evaluate their potential impact on listed buildings located in and around Longside.

In conclusion, the proposal does not raise immediate concerns with respect to impact on the historic built environment but indicative elevation drawings of the development are required to make an informed decision on whether it will align with Policy 7 of National Planning Framework 4 and Section 11 of the 2023 Aberdeenshire Local Development Plan.

[REDACTED]

From: [REDACTED]
Sent: 06 December 2023 11:01
To: Planning Online
Subject: [REDACTED]

Please upload to ENQ/2023/1465.

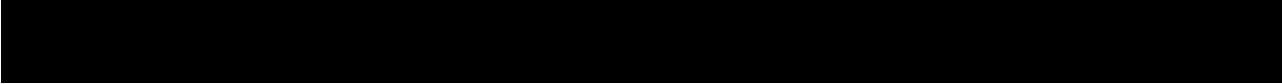


[REDACTED]

Please remember to submit all planning applications, including revised drawings and additional supporting information via the [National ePlanning Portal](#)

Website: <https://www.aberdeenshire.gov.uk/planning/>

Your feedback is important to us and helps us to improve our service – we value your [comments](#).



[REDACTED]

Sent: Wednesday, December 6, 2023 10:44 AM

Subject: RE: SR 935440 - EHN - ENQ/2023/1465 Netherton Hub Scoping Consultation Request



Due to uniform being down, please find details of my response below due to uniform being down.

Noise

The applicant has advised that a BS4142 assessment will be undertaken. Given the low background noise levels, in addition to the BS4142 assessment, the Environmental Health Service would require the noise to be assessed against the NR20 curve criterion for internal noise levels at night. The NIA should also take into account any cumulative impact from other sites and comparing against NR20 internal noise curve.

Dust

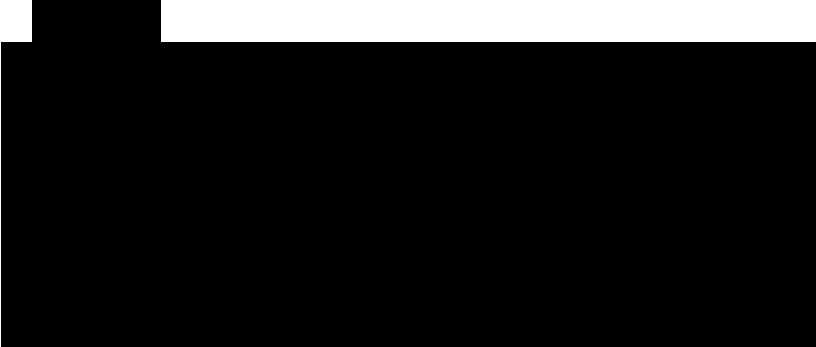
At full planning stage, if significant groundworks are being undertaken, the applicant should provide a dust management plan to ensure that dust from the site does not negatively impact nearby residential properties. Any complaints in regards to dust will be investigated under the Environmental Protection Act 1990 in terms of statutory nuisance.

Private Water Supplies

The applicant should consider the potential risk of contamination or disruption to nearby private water supplies within the vicinity of the site. A risk assessment should be undertaken to identify private water supplies (if any) to ensure that they are not negatively impact in terms of quality and quantity by the development.

Please note, these observations are based on the information provided by the applicant at the pre-planning application stage. Additional information may be requested by the Service at the full planning stage.

Regards



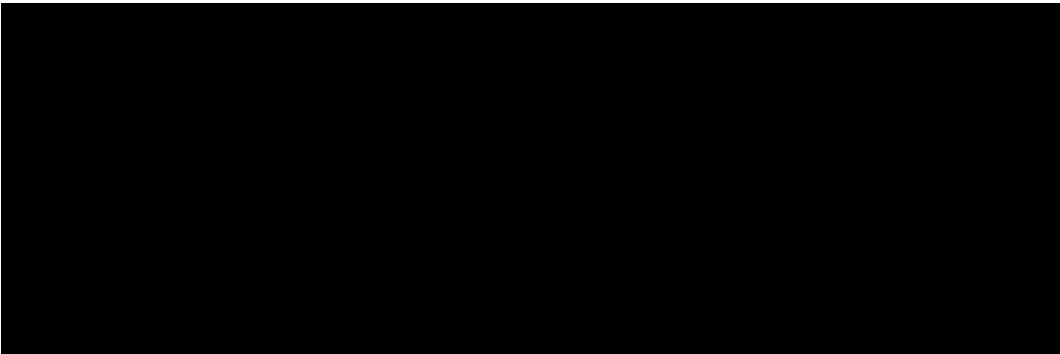
REHIS
Chartered Environmental Health Officer
2023

From: [Redacted]
Sent: Tuesday, December 5, 2023 8:51 AM
To: [Redacted]
Subject: RE: SR 935440 - EHN - ENQ/2023/1465 Netherton Hub Scoping Consultation Request

Hi Catherine,

Please find attached relevant documents.

Thanks,



Please remember to submit all planning applications, including revised drawings and additional supporting information via the [National ePlanning Portal](https://www.aberdeenshire.gov.uk/planning/)

Website: <https://www.aberdeenshire.gov.uk/planning/>

Natural Environment Team Consultation Response

Planning Reference No:	ENQ/2023/1465
Environment Planner:	[REDACTED]
Date of Response:	02/11/2023

Overall Response:	Acceptable
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Issue 1:	EIA Scoping – Ecology / Ornithology
Response:	Acceptable
Actions:	
a)	n/a
b)	
<u>Discussion:</u>	
<p>The range of surveys that have been carried out, and proposed further assessments, are acceptable. Habitats and some species have been scoped out of further assessment due to the nature of the area and the rationale behind this is accepted.</p> <p>It is noted that the Buchan Ness to Collieston SAC/SPA is to be scoped out of further assessment and that a separate Habitats Regulations Appraisal Screening report will be prepared to consider the potential for likely significant effects on the Loch of Strathbeg and Ythan Estuary SPAs. This appears to be acceptable, however Nature Scot would be more competent to advise on this.</p>	

Issue 2:	Opportunities for Biodiversity Enhancement
Response:	Acceptable
Actions:	
a)	n/a
b)	
<u>Discussion:</u>	
<p>Policy P1 of the Aberdeenshire Local Development Plan 2023 and Policy 3(c) of National Planning Framework 4 require that, for all sites, measures are identified to enhance biodiversity in proportion to the opportunities available and the scale of the development.</p> <p>A Biodiversity Net Gain (BNG) assessment of the site and proposed development is to be carried out and will be reported in a standalone document. This will set out the pre- and post-development units and aim to demonstrate net gain through habitat creation and enhancement. It is expected that any loss of semi-natural habitats will be compensated for through this process.</p>	

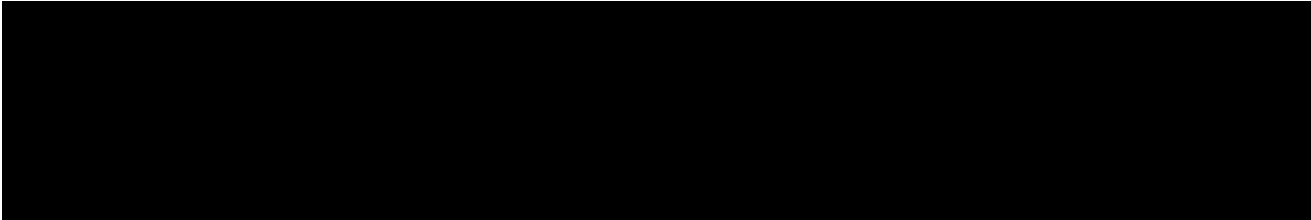
From: [REDACTED]
Sent: 07 November 2023 11:32
To: Planning Online
Subject: For Consideration: ENQ/2023/1465

EIA Screening/Scoping Opinion for Scoping Opinion for National Development for Erection of Energy Hub at Netherton Hub, Land To West Of Parkhill Farm, Blackhills, Peterhead
Grid Reference: 405430.846013
Reason for Consultation: National Development

We refer to your email dated 23/10/23 regarding the above enquiry. This service has been involved in ongoing discussions with the agent and SEPA regarding the potential flooding and drainage issues on site, therefore we have nothing additional to request within the EIA.

Regards

[REDACTED]
Civil Engineer/Technician
Flood Risk and Coast Protection
Infrastructure Services
Aberdeenshire Council
Tel: 01467 534452



To be uploaded to the above ENQ please.

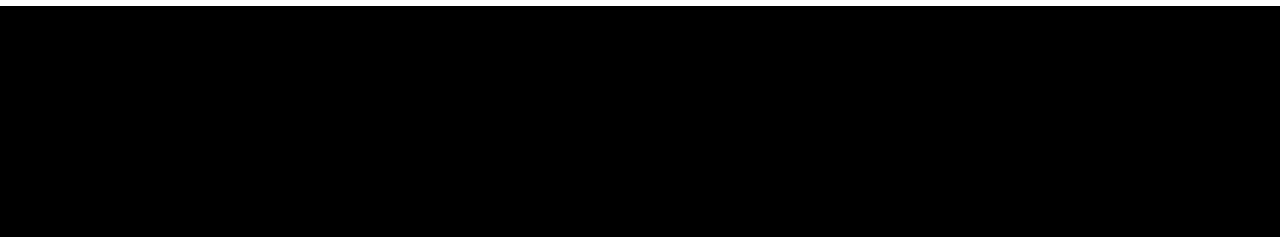


Please note normal working hours: Tuesday to Thursday 8.30am- 2.30pm

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Website: <https://www.aberdeenshire.gov.uk/planning/>

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With regard for to the above request for scoping opinion, Roads Development have previously had discussions with SSE and their consultants on this project.

Generally, Roads Development's main interest would be regarding the accesses for work sites / construction compounds and need for appropriate visibility splays and other issues relating to traffic management / road safety etc.

The level of traffic and transportation generation of this proposal will be mainly confined to the construction stage, and therefore from the traffic and transport position we do not require further assessment within an EA and localised impacts of the scheme can be addressed through the normal planning application process. At that stage, Roads Development would require more information including the extents of any development and the traffic management plan identifying the types of vehicle proposed, any extra ordinary vehicles (length, height and weight) and the proposed routing of the delivery vehicles. We would also be able to identify any possible mitigation measures on the road network.

As mentioned earlier, one of our key considerations is visibility splays at access junctions as road safety for all users is a key consideration for the Council. The proposed access routes to/from worksites will also be of interest as depending upon the routes chosen we may require measures such as localised road widening, widening on curves and/or passing places to be provided along the routes. It may also be necessary for junction upgrades to be provided at access points (e.g. right turn lanes etc.).

If significant worksites are located on or close to existing bus routes, we would look to see how safe and convenient access to bus services can be provided. This could include new/relocated bus stops, and safe pedestrian facilities between the worksite and bus stops. In this regard, the Council's Public Transport Unit should also be consulted.

With regard to the proposed location of the Netherton Hub, it is understood that the main access will be via the A950, although there will likely be an access on the south side too, off the U55b unclassified public road.

We have reviewed Chapter 8 (Traffic and Transport) of the Scoping Report and generally have no issues or concerns with the content or proposed methodology. We would however make the following comments on this Chapter:

Section 8.5.1 – we would suggest that the following roads are also included in the list of roads to be considered in terms of the impact of the proposed development:

- A950 between the proposed development site and Longside, as well as through Longside and Mintlaw
- The U55b unclassified road to the south of the development

If it is considered that there will be minimal or no impact upon the above roads and settlements, please state this with justification as appropriate.

The above is not an exhaustive list of possible measures for consideration, but I hope this is helpful and gives an insight to the matters that Roads Development would consider. We would be pleased to discuss further as and when required.

Kind Regards,



Roads Development Engineer
Roads Development and Transportation

It appears that the area of interest is in the consultation zones of a number of major accident hazard pipelines:

- The St Fergus /Mossmoran NGL pipeline operated by Shell UK Exploration and Production
- The St Fergus to Cruden Bay NGL pipeline operated by Ineos FPS Ltd
- The 12 Feeder St Fergus/Aberdeen gas pipeline operated by National Grid Gas plc
- The 11 Feeder St Fergus/Aberdeen gas pipeline operated by National Grid Gas plc

1.Consultation with HSE on Land Use Planning

HSE has a role in the planning process as a statutory consultee is to provide local planning authorities with advice on the risks to people at a proposed development from a major accident at a site storing, transporting or using hazardous chemicals. If the proposed development will have no significant effect on the numbers of people present in the consultation zone once the construction work has been carried out then we would not need to be formally consulted. For example if the development will not have a permanent workforce and will not be accessible by members of the public the Land Use Planning advice team would not need to be consulted on a planning application – would that be the case here?

2. Consultation with pipeline operators

We would recommend that the relevant pipeline operator should be consulted over any planning applications in this area, as they may have a legal interest (easement, wayleave, etc.) which may restrict certain developments within a certain proximity of the pipeline, and/or the standards to which the pipeline is designed and operated may restrict occupied buildings or major traffic routes within a certain proximity of the pipeline. Consequently, there may be a need to modify the pipeline, or its operation, if any development proceeds.

We hope that the above helps take your assessment forward. Please get back to us if you would like to discuss further.

Kind regards

[Redacted signature]

Land Use Planning Advice team - Chemicals Explosives Microbiological Hazards Division 5B



Redgrave Court, Merton Road, Bootle, Merseyside, L20 7HS

02030283092

Please send enquiries on Land Use Planning to lupenquiries@hse.gov.uk and enquiries on hazardous substance consents to HazSubCon@hse.gov.uk

From: [Redacted] >
Sent: 27 October 2023 14:37
To: LUP enquiries <LUPenquiries@hse.gov.uk>
Subject: ENQ/2023/1465

Good afternoon,

I tried to complete your online form and received the message below –



By email to:

[REDACTED]
Aberdeenshire Council

Dear Aberdeenshire Council

[The Town and Country Planning \(Environmental Impact Assessment\) \(Scotland\) Regulations 2017](#)
[National Development for Erection of Energy Hub at Netherton Hub at Netherton Land To West Of Parkhill Farm, Blackhills, Peterhead - Scoping Opinion](#)

Thank you for your consultation which we received on 27 October 2023 about the above scoping report. We have reviewed the details in terms of our historic environment interests. This covers world heritage sites, scheduled monuments and their settings, category A-listed buildings and their settings, inventory gardens and designed landscapes, inventory battlefields and historic marine protected areas (HMPAs).

Your archaeological and cultural heritage advisors will also be able to offer advice on the scope of the cultural heritage assessment. This may include cultural heritage assets not covered by our interests, such as unscheduled archaeology, and category B- and C-listed buildings.

Proposed Development

We understand that the proposed development is located at Netherton, Blackhills, to the west of Peterhead. The proposed development comprises the construction and operation of a new energy hub with a number of electrical substations and ancillary structures between 15m and 29m in height. These include a 400kV substation, a 132kV substation, an HVDC substation, the Spittal to Netherton HVDC convertor station, the Eastern HVDC Green Link 3 (EGL3) convertor station and an operations depot and store. In addition to the substations ancillary infrastructure including lighting, fencing and permanent access roads are also included in the proposed development.

Background

We have previously provided advice on the 20 February 2023 (our case number 300063195) at the optioneering stage for the proposed development. Given the limited information within the consultation booklet at the time, our comments were limited. In our response, we noted that the current site option (*Site Option 4*) was in proximity to the Category A listed **Old Parish Church of Longside (LB9410)**, approximately 2km to the

[REDACTED]



north-west in Longside. Our response stated that it was likely that significant adverse effects on the setting of the church could be avoided, however, an initial assessment should be undertaken to determine whether effects are likely.

Scope of assessment

We welcome that the potential cultural heritage effects are scoped into the Environmental Impact Assessment (EIA), however the proposed scope of assessment is not sufficient for our needs as the applicant proposes to scope out impacts on the setting of designated cultural heritage assets. We consider that the proposals have the potential to affect a number of cultural heritage assets in our remit, and therefore recommend that any EIA undertaken in support of the proposals should include a full assessment of impacts on the historic environment. This should take into account the approach referenced within our [Managing Change in the Historic Environment: Setting](#) guidance.

We note that the applicant references the International Council on Monuments and Site (ICOMOS) guidance 2010. This guidance has been superseded by updated ICOMOS guidance that was produced in 2022. However, please note that in Scotland, we treat the advice in the HES/NatureScot [EIA handbook](#) as best practice for EIA and would refer the applicant to use it. We do welcome reference to our *Managing Change in the Historic Environment: Setting* guidance and would expect to see a structured approach presented within the EIA for the assessment of any impacts which may arise from the proposed development detailing construction, operational and cumulative effects on our interests.

Direct physical impacts

We can confirm that there are no World Heritage Sites, scheduled monuments, category A listed buildings, inventory battlefields, or inventory gardens or designed landscapes within the proposed development boundary.

Setting impacts

Careful consideration should be given to reducing and avoiding impacts on the setting of cultural heritage assets during the design process. It is not clear why a 1km arbitrary study area has been chosen for the cultural heritage chapter when the wider study area is noted elsewhere within the scoping document as 3km. No explanation is provided for the extent of this 1km study area or why this is considered proportionate for a development of this height and density.

Rather than using a specific study area, we recommend that assets at risk of impact should be identified using a 'bare earth' Zone of Theoretical Visibility (ZTV). The EIA chapter should provide an evidential base for the sieving of assets from any subsequent detailed assessment. This sieving exercise should give consideration for assets with long distance views which form part of their cultural significance and should be informed by a robust assessment and appropriate visualisations.



Please note that views towards an asset can also be an important part of its setting. We therefore again recommend that assessment should be made with reference to our [Managing Change in the Historic Environment: Setting](#) guidance, which includes provision for consideration of both views from the asset, for which the ZTV is key, and views towards the asset. This may necessitate consideration of additional assets outwith the ZTV.

Visualisations

We request that a photomontage is produced which provides views from [Cairn Catto, long cairn \(SM3276\)](#). Given the alignment of this long cairn in the direction of the proposed development, this will highlight any changes in this key view. We also request that a photomontage is produced from the churchyard of [Old Parish Church of Longside \(LB9410\)](#), looking towards the development.

Issues Scoped Out

The applicant seeks to scope out indirect impacts on heritage assets during construction and operation which we agree with. We also agree with the applicant's intention to scope out direct impacts during construction and operation from the proposed development on World Heritage Sites, Marine Protected Areas, Garden & Designed Landscapes and Inventory Battlefields.

We disagree with scoping out the **Old Parish Church of Longside (LB9410)** from further assessment in the EIA. We also disagree with the decision to scope out direct impacts during construction and operation on scheduled monuments (*paragraph 7.6.1*).

We note (*paragraph 7.7.1*) that the applicant subsequently references scoping back in direct impacts on the setting of designated assets within 1km of the proposed development. We would seek clarity that this includes impacts on scheduled monuments however would again query the arbitrary 1km study area proposed. We would expect a commitment from the applicant to undertake assessment of the settings of designated assets, including scheduled monuments and that any subsequent assessment of setting impacts should follow a clear and systematic framework for evaluating these impacts.

Mitigation

This section primarily addresses direct physical impacts. The EIA process should also include consideration of mitigation by design to avoid, reduce and offset setting impacts on cultural heritage assets. This process should be documented within the EIA report.

Our Advice

In its current form, the proposed development has potential to have impacts on a number of designated cultural heritage assets including [Cairn Catto, long cairn \(SM3276\)](#) and [Old Parish Church of Longside \(LB9410\)](#). This list of assets should not be taken as comprehensive, and the impact on designated cultural heritage assets should be





assessed within any EIA. We also recommend that, given the height and scale of the proposed development, impacts should be assessed beyond the 1km study area proposed by the applicant.

In our view, although there is potential for the development to have impacts on cultural heritage assets in the area, there is the potential to mitigate impacts by design, and we would encourage further dialogue on this as the proposals progress. We also would be happy to advise on the findings of any initial assessment if that would be helpful to you.

We have not received sufficient information at this stage to suggest any useful mitigation that might reduce adverse impacts on cultural heritage assets in the vicinity of the proposed development.

Further information

Further information on good practice in cultural heritage assessment is available in Appendix 1 of the [EIA Handbook](#) (2018). Mitigation measures to lessen potential adverse impacts should be considered in line with this guidance. The [Historic Environment Policy for Scotland](#) (HEPS 2019) which is a strategic policy document for the whole of the historic environment and is underpinned by detailed policy and guidance will also be relevant.

Guidance about national policy can also be found in our 'Managing Change in the Historic Environment' series available online at www.historicenvironment.scot/advice-and-support/planning-and-guidance/legislation-and-guidance/managing-change-in-the-historic-environment-guidance-notes.

We hope this is helpful. Please contact us if you have any questions about this response. The officer managing this case is Kevin Mooney and they can be contacted by phone on 0131 651 6787 or by email on kevin.mooney@hes.scot.

Yours faithfully

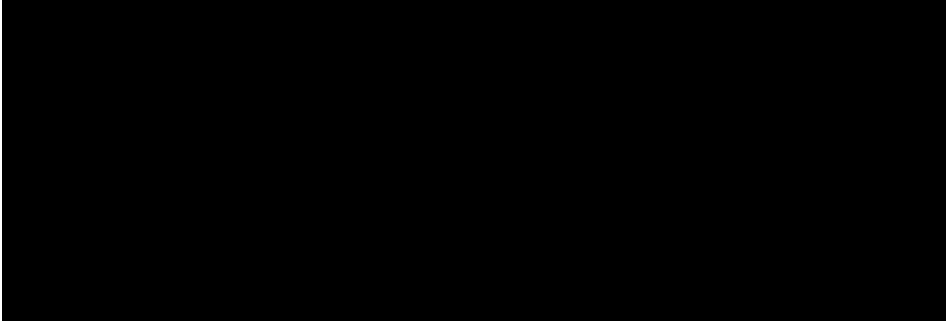
Historic Environment Scotland





NatureScot

Scotland's Nature Agency
Buidheann Nàdair na h-Alba



13 November 2023

Your ref: ENQ/2023/1465

Dear Sir/Madam,

EIA Screening/Scoping Opinion for National Development for Erection of Energy Hub, Netherton Hub on land to west of Parkhill Farm, Blackhills, Peterhead

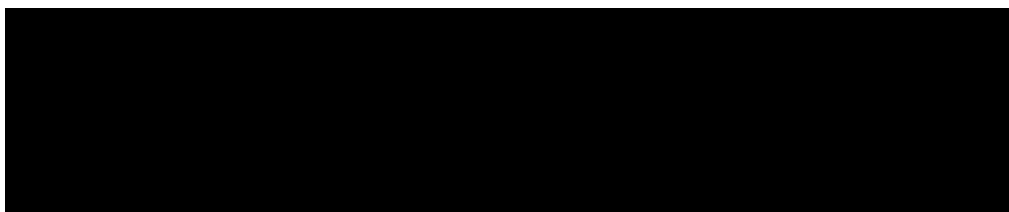
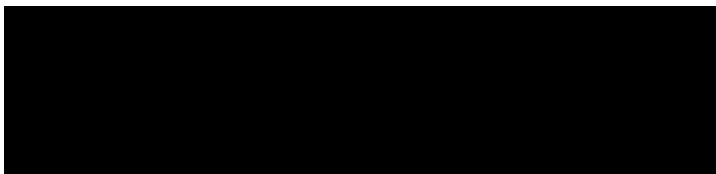
Thank you for your consultation dated 05 November.

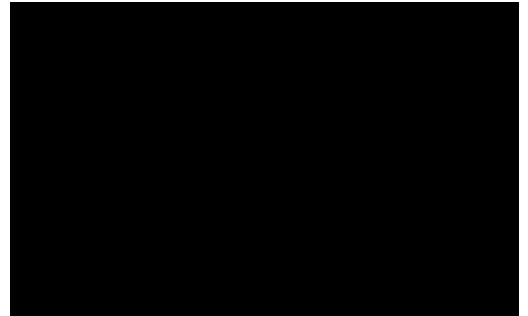
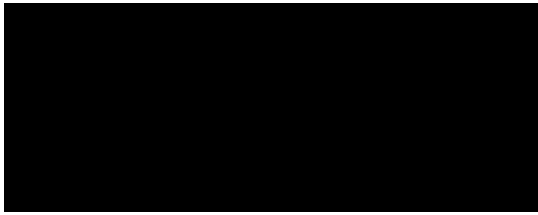
We agree with the Applicant's proposed approach for baseline collection and consider that the range of ecological surveys will be sufficient and appropriate to inform the assessment of environmental effects.

We agree with the list of issues to be scoped out and the rationale behind the decision. This includes scoping out protected areas designated for nature conservation.

If you require any further information or advice, please contact us.

Yours faithfully





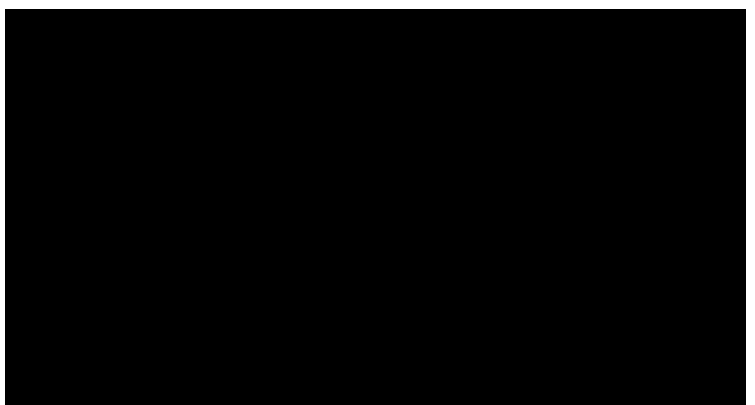
ENQ/2023/1465

**EIA Screening/Scoping Opinion National Development for Erection of Energy Hub
Netherton Hub, Land to West of Parkhill Farm, Blackhills, Peterhead**

Thank you for consulting SEPA for an Environmental Impact Assessment (EIA) screening/scoping opinion in relation to the above development on 23 October 2023. We confirm we have had some early engagement with the applicant to discuss the issues raised in this letter and would welcome further pre-application engagement once further studies/assessments have been undertaken.

We note an Environmental Impact Assessment (EIA) will be carried out by the applicant. We agree and welcome the impact on the existing **water environment including wetlands, flood risk** and any **existing ground water abstractions** are scoped into the EIA. We have provided further comments on these issues below and to avoid delay and potential objection these must be addressed and information submitted in support of the application.

Please note some of the guidance referenced in this response is being reviewed and updated to reflect the new policies in National Planning Framework 4 (NPF4). It will still provide useful and relevant information but some parts may be updated further in the future.



Advice for the planning authority

1. Engineering activities which may have adverse effects on the water environment

- 1.1. The site layout should be designed to minimise watercourse crossings and avoid other direct impacts on water features. No culverting for land gain will be accepted. The submission must include a map showing:
 - a) All proposed temporary or permanent infrastructure overlain with all watercourses.
 - b) A minimum buffer of 10m around each watercourse. If this minimum buffer cannot be achieved each breach must be numbered on a plan with an associated photograph of the location, dimensions of the watercourse and drawings of what is proposed in terms of engineering works. Measures should be put in place to protect any downstream sensitive receptors.
- 1.2. Further advice and our best practice guidance are available within the water [engineering](#) section of our website. Guidance on the design of water crossings can be found in our [Construction of River Crossings Good Practice Guide](#).
- 1.3. We encourage applicants to seek such opportunities to avoid or offset environmental impacts. As the development covers a large area there may be opportunities to incorporate improvements in the water environment within and/or adjacent to the site as part of mitigation measures or as compensation for environmental impact. Fencing off watercourses and creating buffer strips both helps reduce the risk of diffuse water pollution and affords protection to the riparian habitat.
- 1.4. There are several small watercourses and drainage ditches on site, and we will expect these and their associated banks to be included in an NVC survey to inform a Habitat Management Plan and environmental enhancements and Biodiversity net gain in the detailed design.
- 1.5. The small watercourse running south-north through the site to Flushing could possibly be a straightened watercourse and maybe contributing to the area of surface water flooding around Flushing. We would very much welcome the investigation into the renaturalisation of this watercourse and removal of any man-made features. This has the potential to not only add to biodiversity net gain but also, by adding length and width could mitigate the surface water flooding downstream.

- 1.6. Likewise, the watercourse to the southwest of the site running SE to NW to Mill of Tiffern appears to be a straightened watercourse and although running along the proposed site boundary and slightly away from it, we would welcome the investigation into the renaturalisation of this watercourse and removal of any man-made features.
- 1.7. Groundwater Dependent Terrestrial Ecosystems (GWDTE) are protected under the Water Framework Directive. Excavations and construction works can disrupt groundwater flow and impact on GWDTE and existing groundwater abstractions. The layout and design of the development must avoid impacts on such areas. A National Vegetation Classification (NVC) survey which includes the following information should be submitted:
- a) A map demonstrating all GWDTE and existing groundwater abstractions are outwith a 100m radius of all excavations shallower than 1m and outwith 250m of all excavations deeper than 1m and proposed groundwater abstractions. The survey needs to extend beyond the site boundary where the distances require it.
 - b) If the minimum buffers cannot be achieved, a detailed site specific qualitative and/or quantitative risk assessment will be required. Please refer to [Guidance on Assessing the Impacts of Development Proposals on Groundwater Abstractions and Groundwater Dependent Terrestrial Ecosystems](#) for further advice and the minimum information we require to be submitted.
- 1.8 We note a UKHab survey has been carried out at a suboptimal time. We **highlight a separate NVC survey will need to be undertaken** to determine the presence of GWDTE on site. SEPA accept UKHab surveys as Phase 1 surveys but do accept them for the full survey stage.

2. Flood risk

- 2.1 Please refer to our [Flood Risk Standing Advice](#) for advice on flood risk. Water crossings must be designed to accommodate the 0.5% Annual Exceedance Probability flows (with an appropriate allowance for climate change), or information provided to justify smaller structures.
- 2.2 The site appears to lie well outwith the future fluvial flood extents on our Future Flood Risk Maps. However, we note there are a number of small watercourses and drains that

are too small for inclusion on our Future Flood Risk Maps and the potential flood risk from these must be considered going forward. You can view the SEPA Flood Maps and can find out more about them at [Flood Maps | SEPA - Flood Maps | SEPA](#).

- 2.3 We note from our GIS and discussions with your flood risk management colleagues that a large surface water flooding extent exists to the north of the site on A950 by Flushing. Surface water flooding is an issue for the Council to comment on but our comments in Section 1.5 above should be taken into consideration in relation to this issue.
- 2.4 If it is considered the development could result in an increased risk of flooding to a nearby receptor then a Flood Risk Assessment (FRA) must be submitted. Our [Technical flood risk guidance for stakeholders](#) outlines the information we require to be submitted in an FRA. Please also refer to [Controlled Activities Regulations \(CAR\) Flood Risk Standing Advice for Engineering, Discharge and Impoundment Activities](#).

3. Existing groundwater abstractions

- 3.1 Excavations and other construction works can disrupt groundwater flow and impact on existing groundwater abstractions. Although there appear to be no private water supplies (PWS) within or in close proximity to the site on our GIS, the presence of any PWS or not, should be confirmed by the applicant going forward. The submission must include:
- a) A map demonstrating that all existing groundwater abstractions are outwith a 100m radius of all excavations shallower than 1m and outwith 250m of all excavations deeper than 1m and proposed groundwater abstractions.
 - b) If the minimum buffers above cannot be achieved, a detailed site specific qualitative and/or quantitative risk assessment will be required. We are likely to seek conditions securing appropriate mitigation for all existing groundwater abstractions affected.
- 3.2 Please refer to [Guidance on Assessing the Impacts of Development Proposals on Groundwater Abstractions and Groundwater Dependent Terrestrial Ecosystems](#) for further advice on the minimum information we require to be submitted.

Regulatory advice for the applicant

Details of regulatory requirements and good practice advice, for example in relation to private drainage, can be found on the [regulations section](#) of our website. If you are unable to find the

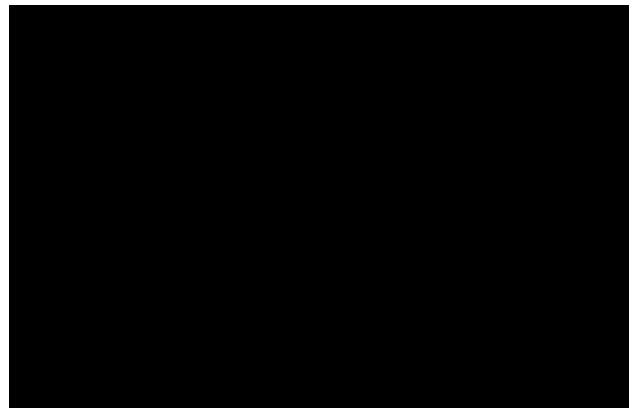
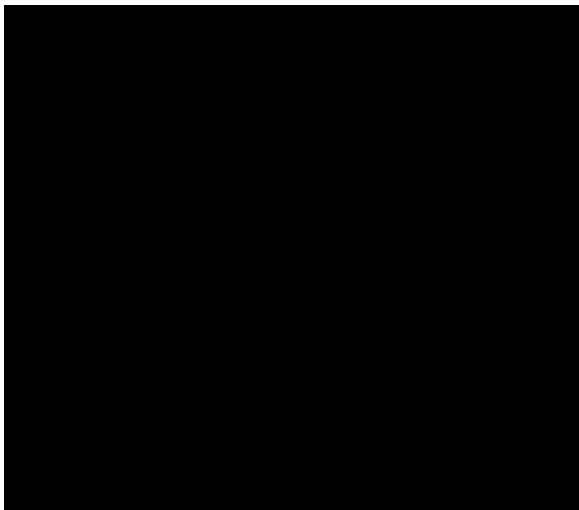
advice you need for a specific regulatory matter, please contact a member of the local compliance team at: gs@sepa.org.uk

If you have queries relating to this letter, please contact us at the email above including our reference number in the email subject.

Yours sincerely

[Redacted signature block]

Disclaimer: This advice is given without prejudice to any decision made on elements of the proposal regulated by us, as such a decision may take into account factors not considered at this time. We prefer all the technical information required for any SEPA consents to be submitted at the same time as the planning or similar application. However, we consider it to be at the applicant's commercial risk if any significant changes required during the regulatory stage necessitate a further planning application or similar application and/or neighbour notification or advertising. We have relied on the accuracy and completeness of the information supplied to us in providing the above advice and can take no responsibility for incorrect data or interpretation, or omissions, in such information. If we have not referred to a particular issue in our response, it should not be assumed that there is no impact associated with that issue. For planning applications, if you did not specifically request advice on flood risk, then advice will not have been provided on this issue. Further information on our consultation arrangements generally can be found on our [website planning pages - www.sepa.org.uk/environment/land/planning/](http://www.sepa.org.uk/environment/land/planning/).



Dear Customer,



Please quote our reference in all future correspondence

Audit of Proposal

Scottish Water has no objection to this planning application; however, the applicant should be aware that this does not confirm that the proposed development can currently be serviced. Please read the following carefully as there may be further action required. Scottish Water would advise the following:

Drinking Water Protected Areas

A review of our records indicates that the proposed activity falls within a drinking water catchment where a Scottish Water abstraction is located. Scottish Water abstractions are designated as Drinking Water Protected Areas (DWPA) under Article 7 of the Water Framework Directive. The River Ugie supplies Forehill Water Treatment Works (WTW) and it is essential that water quality and water quantity in the area are protected. In the event of an incident occurring that could affect Scottish Water we should be notified without delay using the Customer Helpline number **0800 0778 778**.

The activity should be of low risk to water quality provided water quality mitigations are put in place during construction activities to protect the surrounding water environment. Once in situ there should be regular checks of equipment and apparatus to ensure there is no

detrimental effects on the water environment such as leaks and spills for any equipment or apparatus.

Scottish Water have produced a list of precautions for a range of activities. This details protection measures to be taken within a DWPA, the wider drinking water catchment and if there are assets in the area. Please note that site specific risks and mitigation measures will require to be assessed and implemented. These documents and other supporting information can be found on the activities within our catchments page of our website at www.scottishwater.co.uk/slm.

We welcome that reference has been made to the Scottish Water drinking water catchment.

The fact that this area is located within a drinking water catchment should be noted in documentation. Also anyone working on site should be made aware of this during site inductions..

We would also like to take the opportunity, to request that 3 months in advance of any works commencing on site, Scottish Water is notified at protectdwsources@scottishwater.co.uk. This will enable us to be aware of activities in the catchment and to determine if a site meeting would be appropriate and beneficial.

Surface Water

For reasons of sustainability and to protect our customers from potential future sewer flooding, Scottish Water will not accept any surface water connections into our combined sewer system.

There may be limited exceptional circumstances where we would allow such a connection for brownfield sites only, however this will require significant justification from the customer taking account of various factors including legal, physical, and technical challenges.

In order to avoid costs and delays where a surface water discharge to our combined sewer system is anticipated, the developer should contact Scottish Water at the earliest opportunity with strong evidence to support the intended drainage plan prior to making a connection request. We will assess this evidence in a robust manner and provide a decision that reflects the best option from environmental and customer perspectives.

General notes:

- ▶ Scottish Water asset plans can be obtained from our appointed asset plan providers:
 - ▶ Site Investigation Services (UK) Ltd
 - ▶ Tel: 0333 123 1223
 - ▶ Email: sw@sisplan.co.uk
 - ▶ www.sisplan.co.uk

I trust the above is acceptable however if you require any further information regarding this matter please contact me on **0800 389 0379** or via the e-mail address below or at planningconsultations@scottishwater.co.uk.

Yours sincerely,



Scottish Water Disclaimer:

"It is important to note that the information on any such plan provided on Scottish Water's infrastructure, is for indicative purposes only and its accuracy cannot be relied upon. When the exact location and the nature of the infrastructure on the plan is a material requirement then you should undertake an appropriate site investigation to confirm its actual position in the ground and to determine if it is suitable for its intended purpose. By using the plan you agree that Scottish Water will not be liable for any loss, damage or costs caused by relying upon it or from carrying out any such site investigation."

Your ref:
ENQ/2023/1465

Our ref:
GB01T19K05

Date:
27/10/2023

Dear Sirs,

**THE TOWN AND COUNTRY PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT)
(SCOTLAND) REGULATIONS 2017**

**EIA SCREENING/SCOPING OPINION FOR SCOPING OPINION FOR NATIONAL
DEVELOPMENT FOR ERECTION OF NETHERTON ENERGY HUB, LAND TO WEST OF
PARKHILL FARM, BLACKHILLS, PETERHEAD**

With reference to your recent correspondence on the above development, I wish to inform you that from 1st October 2015, planning authorities are no longer required to consult with Scottish Ministers on EIA development.

Historic Scotland has merged with Royal Commission on the Ancient and Historical Monuments of Scotland (RCAHMS) to form Historic Environment Scotland (HES). HES is named as both a statutory consultee in the planning system and as a consultation body for Environmental Impact Assessment (EIA) purposes. Planning authorities are required to make their own arrangements for consulting HES directly on EIA development. Further information on these wider changes can be found in Historic Environment Circular 1.

In light of the above changes, the Scottish Government has taken the opportunity to streamline EIA consultation arrangements such that Transport Scotland will no longer respond to EIA consultations in a statutory capacity. Planning Authorities must, however, continue to consult Transport Scotland on applications where required by Regulation 25 and Schedule 5 of the Town and Country Planning (Development Management Procedure) (Scotland) Regulations 2013. These consultations should be sent to Transport Scotland's Development Management Team.

It should be stressed that this response relates only to the EIA consultation and Transport Scotland will respond separately to the planning application for this development by means of a TRNPA2 if formally consulted.

I trust that the above is satisfactory and should you wish to discuss any issues raised in greater detail, please do not hesitate to contact myself on 0141 272 7953.



8th November 2023

Your ref: ENQ/2023/1465

Our ref: UPO/W/G/NM/AM/kc/23/31

Dear Sir/Madam

Proposal: Erection of Energy Hub at Netherton Hub,

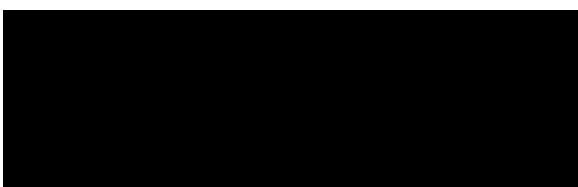
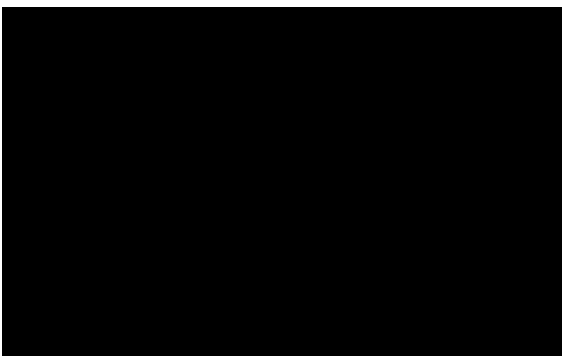
Address: Land To The West Of Parkhill Farm, Blackhills, Peterhead

Grid Reference: 405430.846013

I refer to your correspondence received regarding the above planning enquiry. As the proposal is in close proximity to the Shell pipelines, we offer the following observation: whilst we have no objection in principle to the Erection of Energy Hub at Netherton Hub, the areas of particular concern are;

- 1 The development does not encroach into the pipeline servitude.
- 2 Potential pipeline crossings during construction.
- 3 The risk of AC and DC induced interference affecting the integrity of our pipelines.

If the application is to proceed, we would be pleased to meet with the developer to address our concerns and to ensure that any risk to the pipeline is reduced to as low as reasonably practicable.



Aberdeenshire Council
Planning and Economy Service
Buchan Team

By email: planning@aberdeenshire.gov.uk

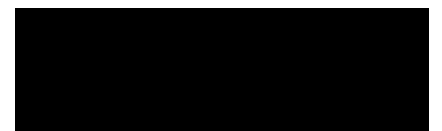
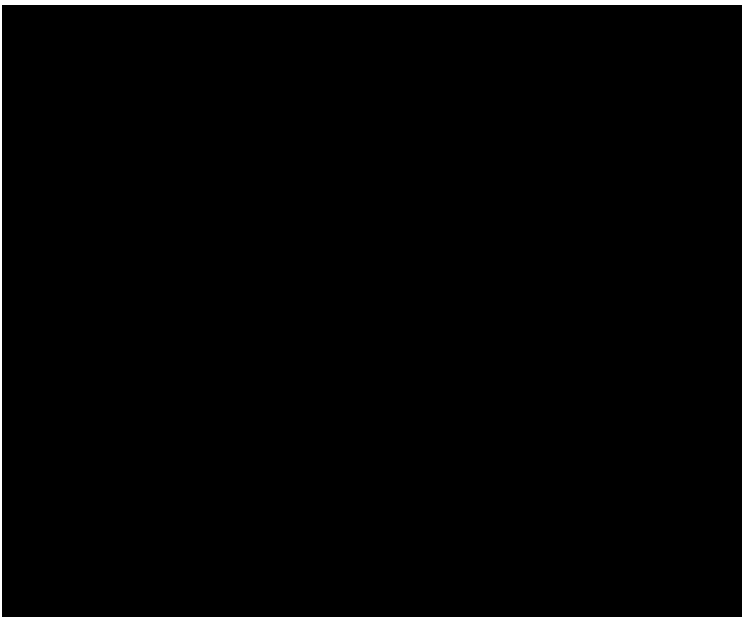
10 November 2023

Application Ref: ENQ/2023/1465
The Town and Country Planning (Environmental Impact Assessment) (Scotland) Regulations 2017
EIA Screening/Scoping Opinion for Scoping Opinion for National Development for Erection of Energy Hub at Netherton Hub, Land To West Of Parkhill Farm, Blackhills, Peterhead

Thank you for your consultation dated 31 October 2023.

We have reviewed the information provided with this consultation and can advise the following:

An INEOS FPS Pipeline routes >1km to the East of this application location. We consider the safe operation or integrity of the pipeline will not be affected by this proposed development. We have no relevant information that would assist in this EIA Screening or any comment on the Scoping Report.



**Planning Work?**

Please enquire with us at

www.lsbud.co.uk**National Gas Emergency Number:
0800 111 999***

*Available 24 hours, 7 days/week.

Calls may be recorded and monitored.

www.nationalgas.com

Date : 11/22/2023

Our Reference: GS1_31343458

Your Reference: ENQ/2023/1465

**Ref: Site Address Not Provided**

National Gas Transmission exercises its right to place a Holding Objection to the above proposal which will cross our High-Pressure Gas Pipeline – Feeder 11.

Holding Objection:

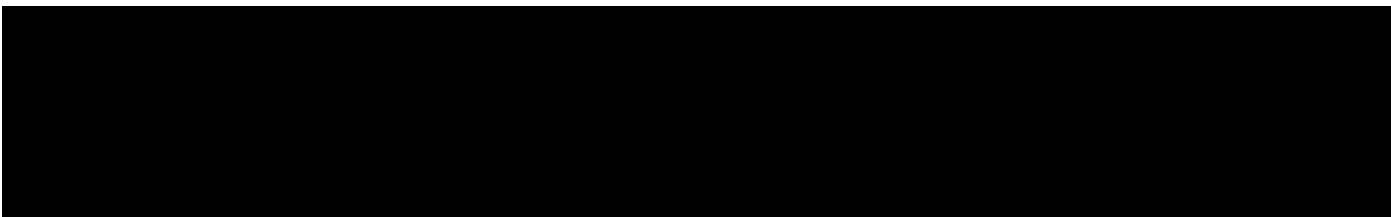
National Gas Transmission operates a high-pressure gas pipeline that runs through the land parcels proposed for development. FEEDER PIPELINE - 11

The pipeline has an easement in operation, NO development, construction or landscaping is permitted within the easement without formal written approval from National Gas Transmission.

There are specific criteria that must be adhered to for developments within close proximity to National Gas Transmission's gas pipelines.

Utility crossings/access routes over National Gas Transmission's gas pipelines are restricted and will require 'Deeds of Consent / Indemnity'.

The developer is to engage with National Gas Transmission for further guidance in the early stages of design to ensure that electrical interference, security, future access, and construction methods can be mutually agreed prior to undertaking any works on site.



- To visit the Land Use Planning site, please use the link below:
<https://www.hse.gov.uk/landuseplanning/methodology.htm>
- No buildings should encroach within the Easement strip of the pipeline
- No demolition shall be allowed within 150 metres of a pipeline without an assessment of the vibration levels at the pipeline. Expert advice may need to be sought which can be arranged through National Gas Transmission.
- National Gas Transmission has a Deed of Easement for each pipeline which prevents change to existing ground levels, storage of materials. It also prevents the erection of permanent / temporary buildings, or structures. If necessary National grid will take action to legally enforce the terms of the easement.
- You should be aware of the Health and Safety Executives guidance document HS(G) 47 "Avoiding Danger from Underground Services", and National Gas Transmission's specification for Safe Working in the Vicinity of National Gas Transmission High Pressure gas pipelines and associated installations - requirements for third parties T/SP/SSW22. You should already have received a link to download a copy of T/SP/SSW/22, from our Plant protection Team, which is also available to download from our website.
- To view the SSW22 Document, please use the link below:
<https://www.nationalgrid.com/uk/gas-transmission/document/113921/download>
- A National Gas Transmission representative will be monitoring the works to comply with SSW22.
- To download a copy of the HSE Guidance HS(G)47, please use the following link:
<http://www.hse.gov.uk/pubns/books/hsg47.htm>
- National Gas Transmission will also need to ensure that our pipelines access is maintained during and after construction.
- 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 National Gas Transmission representative. Ground cover above our pipelines should not be reduced or increased.
- If any excavations are planned within 3 metres of National Gas Transmission 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 National Gas Transmission representative. A safe working method must be 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.
- 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 National Gas Transmission representative. Similarly, excavation with hand held power tools is not permitted within 1.5 metres from our apparatus and the work is undertaken with NGT supervision and guidance.

Pipeline Crossings

- Where existing roads cannot be used, construction traffic should ONLY cross the pipeline at locations agreed with a National Gas Transmission engineer.

- All crossing points will be fenced on both sides with a post and wire fence and with the fence returned along the easement for a distance of 6 metres.
- The pipeline shall be protected, at the crossing points, by temporary rafts constructed at ground level. No protective measures including the installation of concrete slab protection shall be installed over or near to the National Gas Transmission pipeline without the prior permission of National Gas Transmission. National Gas Transmission will need to agree the material, the dimensions and method of installation of the proposed protective measure. The method of installation shall be confirmed through the submission of a formal written method statement from the contractor to National Gas Transmission.
- Please be aware that written permission from National Gas Transmission is required before any works commence within the National Gas Transmission easement strip.
- A National Gas Transmission representative shall monitor any works within close proximity to the pipeline to comply with National Gas Transmission specification T/SP/SSW22.
- A Deed of Indemnity is required for any crossing of the easement including cables

Cables Crossing

- Cables may cross the pipeline at perpendicular angle to the pipeline i.e. 90 degrees.
- A National Gas Transmission representative shall supervise any cable crossing of a pipeline.
- An impact protection slab should be laid between the cable and pipeline if the cable crossing is above the pipeline.
- 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 must cross below the pipeline with a clearance distance of 0.6 metres.

All work should be carried out in accordance with British Standards policy

- BS EN 13509:2003 - Cathodic protection measurement techniques
- BS EN 12954:2001 - Cathodic protection of buried or immersed metallic structures – General principles and application for pipelines
- BS 7361 Part 1 - Cathodic Protection Code of Practice for land and marine applications.

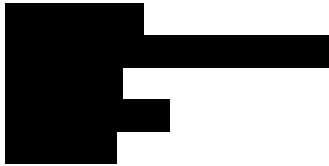
I have enclosed a location map to show the location of National Gas Transmission high-pressure gas pipeline(s) within the vicinity of your proposal.

Yours sincerely

Asset Protection Assistant

Our Ref: 31343610 Your Ref: ENQ/2023/1465

Friday, 27 October 2023



Thank you for your enquiry dated Friday, 27 October 2023

Please find an extract from our mains records for your proposed work area, any SGN assets are described in the map legend. **On some occasions blank maps may be sent to you, this is due to your proposed work being in a no gas area but within our operational boundaries.**

This mains record only shows the pipes owned by SGN in our role as a Licensed Gas Transporter (GT). Please note that privately owned gas pipes or pipes owned by other GTs may be present in this area and information regarding those pipes needs to be requested from the owners. If we know of any other pipes in the area we will note them on the plans as a shaded area and/or a series of x's.

The information shown on this plan is given without obligation or warranty and the accuracy cannot be guaranteed. Service pipes, valves, siphons, stub connections etc. are not shown but their presence should be anticipated. Your attention is drawn to the information and disclaimer on these plans. The information included on the plan is only valid for 28 days.

On the mains record you may see the low/medium/intermediate pressure gas main near your site. There should be no mechanical excavations taking place above or within 0.5m of a low/medium pressure system or above or within 3.0m of an intermediate pressure system. You should, where required confirm the position using hand dug trial holes.

A colour copy of these plans and the gas safety advice booklet enclosed should be passed to the senior person on site in order to prevent damage to our plant and potential direct or consequential costs to your organisation.

Safe digging practices in accordance with HSE publication HSG47 "Avoiding Danger from Underground Services" must be used to verify and establish the actual position of the mains, pipes, services and other apparatus on site before any mechanical plant is used. It is your responsibility to ensure that this information is provided to all relevant people (direct labour or contractors) working for you on or near gas pipes.

It must be stressed that both direct and consequential damage to gas plant can be dangerous for your employees and the general public and repairs to any such damage will incur a charge to you or the organisation carrying out work on your behalf. Your works should be carried out in such a manner that we are able to gain access to our apparatus throughout the duration of your operations.

If you require any further information please do not hesitate to contact us.

