

Representation Form

Please return by **5pm on Wednesday 5 November 2025** to localdevelopment@rushcliffe.gov.uk or to Planning Policy, Rushcliffe Borough Council, Rugby Road, West Bridgford, Nottingham. NG2 7YG

This form has two parts –
Part A – Personal Details
Part B – Your Comment(s)

Part A: Personal Details

Consultee Details:

Name: Paul Geary

Organisation: East Midlands Pipeline Ltd

Address:

E-Mail Address:

If you are an agent acting on behalf of a consultee, please enter your details here:

Name:

Organisation:

Address:

Postcode:

E-Mail Address:

Part B: Comment(s) on draft East of Gamston/North of Tollerton Development Framework Supplementary Planning Document

Please provide your comment or comments on the draft East of Gamston/North of Tollerton Development Framework Supplementary Planning Document (SPD), together with any suggested amendments below. For each comment made, please indicate to which part of the draft SPD the comment relates (e.g. chapter and/or page number).

Comments of East Midlands Pipeline Ltd (EMP) on the Gamston Fields / Tollerton Airfield Masterplan

These comments are submitted to Rushcliffe Borough Council (RBC) on behalf of East Midlands Pipeline Ltd (EMP) in relation to the proposed masterplan for Gamston Fields (Tollerton Airfield).

EMP met with RBC Leader, Chief Executive and other senior officers on Friday 10th October 2025 to ensure the Council is fully aware of our commercial plans for the pipeline that runs across the proposed development area. The existence and location of this pipeline are well known and are shown on the published masterplan with the legally required 3 metre easement.

EMP notes and confirms the following facts:

- The pipeline across the proposed Gamston Fields development has been in situ since the 1970s and was constructed under the statutory regime for pipelines. The pipeline has a legal easement of 3 metres and is currently permitted for use for the transportation of oil products.
- EMP is in the process of finalising purchase of the pipeline asset. Once transfer is complete, EMP intends to repurpose the pipeline for the transportation of hydrogen based fuels, such as Ammonia or Green Hydrogen Gas.
- Conversion to hydrogen based fuels and operation at design pressures in the region of 30–36 bar will materially change the safety buffer and land-use constraints around the pipeline; initial engineering and HSE engagement indicate the operational easement / buffer could increase from the current 3 metres to a typical permanent buffer zone in the order of 6 metres, and in some circumstances (subject to technical design and HSE risk assessment) a wider corridor up to 15–25 metres may be required. The final buffer and any land-use limitations will be determined through engagement with the Health & Safety Executive (HSE), the detailed engineering specification of the pipeline, and relevant statutory/regulatory requirements (including the Pipelines Act and the Pipelines Safety Regulations).

In light of the above, EMP requests that RBC and the masterplan take the following actions and safeguards to avoid loss, blight, design abortive costs, or future legal/financial claims against EMP, the Council, or the developers:

1. Developer contact details and prompt engagement
2. EMP requested direct contacts for the site promoters/developers (Taylor Wimpey / Barwood Strategic Land / Vistry Group) during the 10th October meeting and has not yet received them (status as at 27th October 2025). EMP requests that RBC provide these contact details immediately and confirm that RBC will notify the named developers that EMP will engage directly with them regarding pipeline constraints and design requirements. Prompt direct engagement is essential to avoid abortive design costs and to embed pipeline constraints at the earliest design stage.

3. Reflect pipeline corridor and flexible buffer in the SPD/masterplan
4. The masterplan and forthcoming SPD should explicitly identify the existing pipeline route and easement and make provision for a widened, risk-based pipeline corridor to be defined following HSE advice and EMP's engineering specifications. The SPD should include requirements that no permanent structures, foundations or sensitive receptors (including residential dwellings, schools, or other vulnerable land uses) are to be located within the final operational buffer zone as determined by HSE and EMP.
5. HSE engagement and consultation trigger
6. RBC should formally consult the HSE (via its Planning Advice Web App or by direct referral) at the appropriate stages of the masterplan and any reserved matters / detailed applications that fall within or close to the pipeline corridor. EMP will continue its own engagement with HSE and requests that RBC confirm in writing that the Council will involve HSE at the point of determining applications which could be affected by the pipeline.
7. Planning obligations, protective provisions and mitigation costs
8. Where developer activity results in changes to the easement, design mitigation, monitoring, or additional remediation/works required for the pipeline (including protective works during construction), EMP requests that the SPD and any Section 106 agreements or planning conditions provide for:
 - the recovery by EMP of reasonable mitigation/protection/relocation costs incurred as a result of developer proposals;
 - the inclusion of appropriate protective provisions in planning agreements to secure EMP's rights and to oblige developers to fund and implement agreed protective measures where these are required; and
 - a requirement for developers to maintain access for pipeline inspection, maintenance and emergency response.
9. Requirement for developers to carry out and fund risk assessments
10. Any developer proposals for development within the draft buffer corridor should be required to submit full, up-to-date pipeline risk assessments, method statements and evidence of coordination with EMP and HSE prior to determination. This should include construction phase risk mitigation (e.g. pile design, excavations, plant movement, and safe working distances) and any long-term land-use implications.
11. Notification of planning applications and enforcement of easement
12. RBC should commit to notify EMP directly and in a timely manner of any planning application, amendment or discharge of condition that may affect the pipeline corridor or easement (including applications for ground levels, landscaping, attenuation ponds, roads, or utilities crossing). EMP should be a consultee and be given adequate time to comment.
13. Statutory and regulatory framework
14. EMP draws RBC's attention to the statutory and regulatory context that will inform the determination of buffers and safety measures, including the Pipelines Act, the Pipelines Safety Regulations, and HSE

land use planning guidance and methodology. EMP will work with RBC, HSE and the developers to ensure regulatory compliance while seeking to minimise the adverse impacts on site viability where reasonably possible.

15. Reservation of rights

16. EMP expressly reserves the right to seek compensation or to require the remediation of any works that compromise the pipeline or result in additional cost to EMP. EMP also reserves all rights to pursue any and all remedies available to it (including claims for losses or abortive costs) should development proceed in a manner that does not properly reflect the operational constraints of the pipeline or that prevents EMP from safely and lawfully operating the pipeline for hydrogen based fuel transport, such as Ammonia or Hydrogen Gas.

17. Request for written confirmation and timescales

18. To avoid delay, EMP requests that RBC:

- confirm receipt of these representations;
- provide the developer contact details requested by EMP by return; and
- confirm that the SPD will explicitly record the increased pipeline corridor, require HSE consultation, and include appropriate planning obligations/protective provisions as set out above.

EMP is committed to a constructive working relationship with RBC and the developers to ensure the safe and efficient operation of the pipeline and to minimise disruption to the delivery of the masterplan. Early, transparent engagement will protect public safety, statutory responsibilities, developer investment and EMP's commercial interest in converting the pipeline to hydrogen based fuel transport.

Please acknowledge receipt and confirm the next steps for ensuring EMP is engaged as both the SPD and the developers' detailed proposals progress.

Yours sincerely,

Paul Geary

Director, East Midlands Pipeline Ltd (EMP)

(Please continue on a separate sheet of paper as necessary)

Data Protection

The comments you submit will be used to inform the preparation of the East of Gamston/North of Tollerton Development Framework Supplementary Planning Document (SPD) and will be held for the lifetime of the East of Gamston/North of Tollerton Development Framework SPD. Please note that your comments and your name will not be treated as confidential and will be made available for public inspection, including online. However, contact details (including address and email) will not be made public and will not be passed to external parties.

Please tick to confirm you agree to your comments being made public..... ✓

Privacy Notice

By responding to the consultation, your details will be held by Rushcliffe Borough Council. Further details are provided in our privacy policy which is available at: www.rushcliffe.gov.uk/privacy-notice-and-policy/

Please tick to confirm you have read and understood the privacy notice ✓