

Francesco di Stefano
Environment Agency
By email

SSE Hornsea Ltd.
No.1 Forbury Place
43 Forbury Road
Reading
RG1 3JH

06/11/2025

Application Reference: EPR/CP3225SW/A001
Operator: SSE Hornsea Limited
Facility: Aldbrough Hydrogen Pathfinder

Dear Francesco,

Further to recent discussions on the permit application for the Aldbrough Hydrogen Pathfinder project, I am writing to confirm that SSE Hornsea Limited complies with the Environment Agency's legal operator requirements as outlined in the guidance for environmental permits¹ and the application has been submitted by the correct legal operator.

SSE Hornsea Limited is the current legal operator of Aldbrough Gas Storage (AGS) facility, Garton Road, Aldbrough including the Aldbrough 1 cavern and well (subsurface plant). SSE Hornsea Limited will also be the legal operator of the Aldbrough Hydrogen Pathfinder (AHP) facility. The SSE and Equinor Joint Venture entity (Aldbrough Pathfinder Limited) will appoint SSE Hornsea Limited to operate and maintain the AHP surface plant. This appointment will give SSE Hornsea Limited sufficient control and responsibility for the purposes of the Environmental Permit to be classed as the legal operator of the AHP facility.

We confirm the following:

1. Sufficient Control of the Facility

SSE Hornsea Limited will maintain day-to-day control over all activities conducted at the AHP facility, including the manner and rate of operation, as well as operational decisions, staffing, and compliance with permit conditions.

2. Permit Compliance

All activities will be carried out in accordance with the conditions of the environmental permit when issued. SSE Hornsea Limited will have systems in place to monitor and ensure ongoing compliance.

3. Staff Competency and Oversight

SSE Hornsea Limited will appoint and decide who holds key staff positions and will ensure that personnel are competent and appropriately trained. Any necessary corrective actions, such as removing incompetent staff, will be taken promptly.

4. Financial and Operational Responsibility

SSE Hornsea Limited will have appropriate mechanisms to make investment and financial decisions affecting the AHP facility's performance and how the activity is carried out. This includes budgeting for operations, maintenance, and emergency preparedness.

5. Emergency Control

SSE Hornsea Limited already have robust procedures in place to manage and control existing AGS site activities during emergencies, ensuring minimal risk to the environment and public health. These systems will be replicated and tailored to the requirements of the AHP facility.

¹ [Legal operator and competence requirements: environmental permits - GOV.UK](https://www.gov.uk/guidance/legal-operator-and-competence-requirements-environmental-permits)

The Site will be managed and operated under an Environmental Management System (EMS) which will be certified to ISO14001 and will cover the management system requirements detailed in 'Develop a management system: environmental permits guidance'. The SSE EMS (SSE's own SHE Management System) will apply to the site as required. To supplement this, site-specific management system documents will be developed to cover the processes and location-specific risks.

Should any changes occur that affect our status as the legal operator, we will notify the Environment Agency and take appropriate steps to transfer the permit as required.

We trust this provides sufficient information, but please do not hesitate to contact us if further information or documentation is needed.

Yours sincerely,

Mr. Michael Gillatt
Director of Gas Storage, SSE Hornsea Limited