

# THE KEUPER GAS STORAGE PROJECT

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**Interim Consultation Report**  
**October 2014**

Prepared by  
**ppsgroup** 

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# 1. Executive Summary

- Keuper Gas Storage Limited (KGSL) is consulting on proposals to develop underground gas storage facilities, known as the Keuper Gas Storage Project (KGSP) at the Holford Brinefield and surrounding area to the north of Middlewich, Cheshire. This Interim Consultation Report outlines engagement undertaken to date as part of non-statutory consultation on the application.
- Following guidance that suggests early engagement to allow an opportunity to influence the proposals, KGSL launched the Project in March 2014, proactively engaging with key stakeholders prior to the launch of the non-statutory consultation in April 2014. The approach was outlined in a Statement of Engagement, shared with the relevant local authorities prior to launch.
- Several engagement methods were used to inform members of the community, statutory and non-statutory stakeholders about the proposal and encourage participation, including the circulation of a Project newsletter; holding a series of Information Days; undertaking a proactive meetings programme; hosting a Stakeholder Workshop; setting up dedicated communication channels and website; and face-to-face meetings with local residents.
- All feedback was collated and is recorded and analysed in this report. The main areas of interest from the Information Days were visual appearance; traffic and transport; ecology; health and safety; and investment in the economy. These findings were mirrored at the Stakeholder Workshop and in views expressed on feedback forms, where consultees asked further questions about geology, the economic benefits of the proposal and energy security.
- KGSL has responded to the comments raised throughout the non-statutory consultation period, and feedback has helped shape the proposals, environmental assessments and KGSL's approach as they progressed.
- KGSL continues to update and progress with the plans taking feedback received into account. As a result of consultation responses, KGSL has made a number of updates, including the relocation of five underground cavities – two as a result of further analysis of the geology and three as a direct result of stakeholder feedback regarding proximity to properties.
- KGSL has also drawn on views expressed regarding traffic routing and movements. It is proposed to use the existing access point on King Street to enter and exit the main development site, meaning vehicles will not travel through Byley village. An internal, one-way construction routing system is proposed, with the location of these roads updated following conversations with local residents and tenants.
- Mitigation measures will also be proposed and developed as the application progresses in response to comments regarding visual impact. Measures such as planting, landscaping, appropriate paint colours and screening are proposed and will be advanced following a comprehensive Landscape and Visual Impact Assessment (LVIA).

- Responses provided address other areas of interest and detail the measures that will be in place to safeguard the local environment. Environmental assessments will be influenced by the comments received to date and further information available during the statutory consultation.

## 2. Introduction

### 2.1 Interim Consultation Report

2.1.2 Keuper Gas Storage Limited (KGSL) is proposing to develop additional underground gas storage facilities, known as the Keuper Gas Storage Project (KGSP) at the Holford Brinefield and surrounding area to the north of Middlewich, Cheshire. The project would involve creating up to 19 new specially designed cavities in which natural gas could be stored.

2.1.3 This Interim Consultation Report (the Report) has been prepared on a voluntary basis to provide an update of consultation activities undertaken by KGSL in preparation for its application to the Secretary of State for Energy and Climate Change under the Planning Act 2008 (the Act) for a Development Consent Order (DCO) to develop additional underground gas storage facilities at the Holford Brinefield.

2.1.4 This Report does not form part of any statutory requirement but will provide the basis for the Consultation Report required to be submitted under Section 37(7) of the Planning Act 2008 with the DCO application.

2.1.5 This Report provides an update on the following:

- how KGSL sought feedback and engaged with stakeholders as part of a non-statutory period of consultation;
- a summary of feedback received to date;
- how KGSL has considered the feedback;
- how pre-application consultation activity required under the Act has been progressing up to the end of July 2014;
- further consultation activity to be progressed as part of the statutory consultation; and how people can take part in that consultation.

### 2.2 The Proposed Development

2.2.1 The proposed development includes the construction and operation of up to 19 underground caverns with capacity to store up to 500 standard million cubic meters (mcm) of natural gas, having an import and export capability of up to 34 mcm per day. In accordance with the provisions of the Planning Act 2008 s.17(1) the Project is a Nationally Significant Infrastructure Project by virtue of the facts that development is to be carried out in England, and the working capacity and maximum flow rate of the Project exceed 43 mcm and 4.5 mcm respectively.

2.2.2 The Application Site is in Cheshire, about 3km due West of the M6 and approximately 3km North of Junction 18. The Application Site is bounded to the West by the A530 (King Street – a

Roman road) and to the East by the B5081. The nearest village is Byley (SJ 721 694), which is to the east.

2.2.3 The draft DCO site boundary includes proposed new gas storage and processing development, in the Holford Brinefield, and extends northwest to Weston Point and south to Ravenscroft to facilitate connection to and upgrade of existing solution mining brine discharge infrastructure and water abstraction.

2.2.4 The draft DCO site boundary can be viewed in Appendix 1.

## **2.3 The Applicant**

2.3.1 The Applicant, KGSL, is a wholly owned subsidiary of INEOS Enterprises Group Limited, which is owned by INEOS Capital. INEOS Enterprises Group Limited is a sister company to INEOS Enterprises Limited's Brine & Water business based at Holford Brinfield ('INEOS Enterprises').

2.3.2 INEOS Enterprises Limited's Brine and Water Business will form part of a new joint venture between INEOS and Solvay, to be known as INOVYN. This joint venture is expected to form in November 2014 and at this point the Brine & Water Business will become part of the INOVYN group of businesses.

2.3.3 KGSL's parent company, INEOS Enterprises Group Limited, consists of a number of chemical manufacturing businesses, each of which is a leader in its own area of activity.

2.3.4 INEOS Enterprises and its predecessors have been solution mining brine for the manufacture of chlor-alkali (chlorine and caustic soda), sodium carbonate (soda ash) and white salt from Cheshire's natural salt deposits for more than 80 years. Chlorine and caustic soda are basic chemical building blocks that are used in the manufacture of a diverse range of everyday products including PVC, bleach and disinfectants, soap, solvents and pharmaceuticals. Sodium Carbonate, now produced by Tata Chemicals who is a major customer for the brine from INEOS Enterprises, is used in the manufacture of glass, detergents and many other chemicals. White salt is supplied directly to consumers and used extensively in the food industry.

2.3.5 INEOS has a number of other sites within the UK which, in the North West, includes INEOS ChlorVinyls Limited's chemical operations at the Runcorn site, employing over 900 people, and INEOS Salt also at Runcorn.

2.3.6 INEOS has extensive experience in the safe manufacture and handling of hazardous chemicals. The businesses are at the forefront of developments in the responsible handling and use of its products, and in the management of environmental issues.

## 3. Legislation and Approach

### 3.1 Introduction

3.1.1 As required under Section 37(7) of the Planning Act 2008 (the Act), KGSL will be producing a full Consultation Report to accompany its application for a Development Consent Order (DCO).

3.1.2 The Consultation Report is a key document that sets out the consultation undertaken in compliance with the Act and relevant guidance in relation to the proposed application, the responses received during consultation and how the applicant has taken account of any relevant responses. It also describes how statutory and non-statutory consultation has helped influence the proposals.

3.1.3 This chapter describes KGSL's approach to consultation and the legislation it has had regard to when designing and implementing its consultation programme.

### 3.2 Statutory Requirements

3.2.1 The Planning Act 2008 (the Act) requires applicants of Nationally Significant Infrastructure Projects (NSIPs) to undertake pre-application consultation on proposals for a DCO.

3.2.2 Sections within the Act that must be complied with during pre-application consultation are:

- **Section 42:** The applicant must consult with prescribed consultees, local authorities and landowners or those with an interest in the land;
- **Section 43:** The applicant must consult with local authorities whose land is directly impacted by the proposals and directly neighbouring local authorities (as part of the Section 42 consultation);
- **Section 44:** The applicant must consult with an owner, lessee, tenant or occupier of land, who has an interest in the land or has the power to sell and convey or release the land (as part of the Section 42 consultation);
- **Section 45:** The applicant must set out a timetable for consultation under Section 42 that is a minimum of 28 days; and Section 42 consultees must be notified of the deadline for the receipt of responses to the consultation;
- **Section 46:** The applicant must provide consultation material to the Secretary of State prior to commencing consultation under Section 42;
- **Section 47:** The applicant must consult with the local community and as part of this is required to: draw up a statement on how the consultation with the community will be undertaken (Statement of Community Consultation); consult relevant local authorities for a minimum of 28 days about the Statement of Community Consultation (SoCC) before it is published and have regard to the responses from the local authorities; advertise the SoCC in

a newspaper circulating in the vicinity of the land; and then carry out the consultation as laid out in the SoCC;

- **Section 48:** The applicant must consult with the wider public by publicising the proposed project application in specified publications and set a deadline for receipt of responses;
- **Section 49:** The applicant must have regard to relevant responses to all consultation and publicity undertaken and to have complied with Sections 42, 47 and 48; and
- **Section 50:** The applicant must have regard to the pre-application guidance procedure for DCO applications when complying with the provisions of the Act.
- PINS will examine the DCO application before making a recommendation to the Secretary of State for Energy and Climate Change (the Secretary of State).
- The Secretary of State will make the final decision on whether the KGSP should be consented.
- To assist applicants, PINS and the Department of Community and Local Government (DCLG) have published guidance and advice notes that set out the Government's expectation for promoters of NSIPs and suggest a range of consultation approaches.
- KGSL has had regard to the requirements of the Act and the following advice and guidance notes as it has undertaken pre-application consultation:
  - **The Planning Act 2008:** Guidance on the pre-application process (Department of Communities and Local Government, 2013).
  - **Advice Note 14:** Compiling the consultation report (Planning Inspectorate, Version 2: April 2012).
  - **Advice Note 16:** The developer's pre-application consultation, publicity and notification duties.

### 3.3 Non-Statutory Consultation

3.3.1 DCLG guidance advises applicants to engage early with statutory consultees with technical information, ideally as part of the design process, to help to ensure that complex issues can be identified and addressed. It also recognises that early engagement can help raise awareness of the project and influence the statutory consultation.

3.3.2 DCLG guidance does however acknowledge that although consultation must happen at a sufficiently early stage to allow consultees a real opportunity to influence the proposals, sufficient detail is needed in order for consultees to be able to understand the nature of the proposals properly. This can create a tension between consulting early and having proposals progressed enough to enable consultees to comment.

3.3.3 As recommended by guidance, KGSL began early non-statutory consultation with stakeholders, launching the project in March 2014. This was followed by the launch of a non-statutory consultation period in April 2014 during which KGSL engaged stakeholders and the local community. This engagement is the focus of this Interim Consultation Report (the Report). As KGSL is taking a multi-stage approach to consultation, the Report documents the proactive engagement undertaken and the feedback received during the first consultation period.

3.3.4 DCLG guidance also recognises the value of, and advises, early non-statutory consultation with statutory and non-statutory consultees in respect of technical information needed to help in the design development process. This early non-statutory consultation is particularly important with relevant local authorities, which have an important role in the pre-application process and later in relation to the Local Impact Report.

### **3.4 Environmental Statement**

3.4.1 The DCO application will be accompanied by an Environmental Statement (ES) prepared in accordance with the Infrastructure Planning (Environmental Impact Assessment) (Amendment) Regulations 2009 (the EIA Regulations) and supporting documents.

3.4.2 The EIA Regulations enable an applicant to ask the Secretary of State to state in writing its formal opinion (a Scoping Opinion) on the information required to be provided in an ES (as set out in the applicant's Scoping Report).

3.4.3 In accordance with Regulation 8 of the EIA Regulations, KGSL requested a Scoping Opinion from the Secretary of State in March 2014 and received a response in April 2014. Responses included in the Scoping Opinion have helped shape the scope of the Environmental Statement. Whilst having regard to opinions expressed, KGSL has also sought to engage further with statutory consultees through a variety of methods detailed in this Report.

### **3.5 Consultation Approach**

3.5.1 KGSL implemented a strategic approach to pre-application consultation that was based on relevant guidance and the issues surrounding the scheme. It took into consideration a number of factors when assessing an appropriate approach to consultation on the project that included:

- The nature of the site, which is part of the existing Holford Brinefield that is owned by INEOS Enterprises Limited;
- The presence of over 200 wells that have already been developed at the site for brine production;
- The presence of other gas storage cavities at the Holford Brinefield, eleven of which are currently used for gas storage with a further eighteen in development;
- Existing gas storage facilities exist in the surrounding area, therefore a precedent for this type of facility already exists locally;
- The existing stakeholder and community engagement links already established by KGSL and INEOS, including with key stakeholders such as tenant farmers; local parish councils; and the established INEOS Site Community Forum in Runcorn;
- The Act states that: "The key aim should be to ensure that the amount of consultation undertaken, and who is consulted, should be proportionate to the size and scale of project and where its impacts will be felt."

3.5.2 Having regard to the location and nature of the proposed development, as well as relevant guidance, KGSL has undertaken non-statutory consultation with stakeholders and the local community that has helped influence the proposals being consulted on at the statutory consultation.

3.5.3 Figure 3.5.4 shows the pre-application consultation timeline for KGSP.

### 3.5.4 Figure: Pre-application Consultation Timeline

Stage	Date	Activity	Purpose
Proactive Engagement	March 2014 – April 2014	Launch of project and proactive engagement with key stakeholders	Inform consultees at an early stage of the development process and seek initial feedback
Non-Statutory Consultation	April 2014 – June 2014	Period of non-statutory consultation	Provide wider opportunity for community feedback and input
Proactive Engagement	June 2014 – present	Interim engagement between consultation periods and maintenance of contact channels	Inform and engage with stakeholders to negate an information void
Statutory Consultation	October 2014 – November 2014	Proposed timeframe for statutory period of consultation	Inform, engage and seek feedback on revised KGSP plans as part of statutory consultation period

## 3.6 Defining Consultees

3.6.1 The DCLG guidance on pre-application consultation (January 2013) suggests that in addition to consulting with ‘people in the vicinity of the land’ developers should also consider those areas and communities not directly impacted but who may be affected by the Project, “for example visually, environmentally or through increased traffic flow”. The guidance also encourages developers to “capture the views of those who work in or otherwise use the area, as well as those who live there.”

3.6.2 In order to account for the fact that there will be some community stakeholders that will be directly impacted by the proposals and others that may have an interest but are not directly impacted, KGSL defined two distinct consultation zones. These can be viewed in Appendix 2.

3.6.3 Zone A was defined as an area where construction is taking place and where there is the potential to experience some effects (both positive and negative) from the proposed KGSP. The

consultation was designed to be most intense in this Zone, with all homes and businesses receiving direct communication via letters and newsletters.

3.6.4 All Public Information Days were held in the vicinity of Zone A and relevant stakeholders including community groups, elected representatives and stakeholder groups were identified and contacted.

3.6.5 Consultation Zone A included:

- 2.5km radius around the main site at Holford, including Lach Dennis and Byley  
– see Appendix 3.
- 0.5km radius around the two new tanks to be located on the existing Lostock Works site  
– see Appendix 4.
- Area within 0.5km of the new outfall pipe to be located at INEOS ChlorVinyls site, Runcorn  
– see Appendix 5.
- 0.75km radius around the existing Whitley Pumping Station, Whitley which is to be refurbished  
– see Appendix 6.

3.6.6 Zone B was designed to engage with a wider population who, whilst not directly affected by the proposals, may have an interest in the Project. KGSL mainly consulted through key stakeholders and representatives of the local community in this Zone, which included:

- the area 0.25km either side of the existing pipeline from Holford to Runcorn  
– see Appendix 7.
- the existing Ravenscroft water pipe from the edge of Zone A south of Byley from the main site to the north of Middlewich  
– see Appendix 8.
- the existing Ravenscroft water pipe from the edge of Zone A north of Whatcroft to the Lostock Works site  
– see Appendix 9.
- brine cavities forming the existing Lostock saturators from the edge of Zone A north of Byley to the Lostock Works site  
- see Appendix 10.

3.6.7 All parish and town councils, local authorities and MPs/MEPs within Zones A and B were specifically notified about the Project and consultation events. Communities in Zones A and B were also informed about the Project through the website, community information line, through information placed in community venues (e.g. libraries) and the local media. Relevant stakeholder groups were also informed about the consultation in order to disseminate information to a wider audience. See a list of the stakeholder groups contacted in Appendix 11.

3.6.8 KGSL identified the main hard to reach groups for the KGSP and considered how to engage with each group:

Hard to reach group	Suggested activity
<p><b>Time limited individuals:</b> Cheshire West &amp; Chester Council recognises that the largest of all hard to reach groups in Cheshire is “time limited individuals.” This group includes people in full time employment, professionals or people in employment with families<sup>1</sup>.</p>	<p>Consultation events were organised for different times of the day, with events in the evening. A variety of methods for engagement and information were deployed, including newsletters and web-based consultation.</p>
<p><b>Older people:</b> Over 65s are less likely to have access to the internet than younger people and tend to prefer more traditional methods of consultation, such as public exhibitions. However, if mobility is a problem, some older people can find access to events such as public exhibitions and stakeholder workshops difficult.</p>	<p>Public exhibitions were held in accessible, local venues. KGSL also offered home visits for those unable to attend public events or provide/fund transport if appropriate. Where requested consultation materials will be supplied in alternative formats – for example with larger text for partially sighted readers.</p>
<p><b>People with disabilities:</b> Similar issues of mobility and access to information apply to people with disabilities.</p>	<p>Exhibition venues were made as accessible as possible for people with mobility issues. KGSL also offered home visits for those unable to attend public events or provide/fund transport if appropriate. Where requested consultation materials will be supplied in alternative formats – for example with larger text for partially sighted readers.</p>
<p><b>Farmers/agricultural workers:</b> Farm owners and tenants can be isolated from nearby communities, often working long hours. This group can be short on time to engage in consultations and a more direct approach is often necessary.</p>	<p>KGSL wrote directly to the farmers affected by the Project and held face-to-face meetings. KGSL also engaged through the existing tenant farmer meeting held by INEOS.</p>
<p><b>People on low income:</b> This group is less likely to have access to private transport and is also less likely to be property owners. Planning consultations can often therefore leave people feeling disenfranchised and without access to</p>	<p>The location of events was particularly important for this group. As such, Information Days were held in a number of local venues so that they were as close as possible to affected residents, minimising the issue of transport.</p>

<sup>1</sup> Cheshire West & Chester Council Statement of Community Involvement Update 2013

the information needed to become involved.	
<p><b>Young people:</b> Young people (under 25) are likely to be turned off by formal processes. This group does however tend to be more technically adept, with the vast majority using digital media.</p>	<p>Online consultation can be particularly effective in engaging with young people. The project website included an online questionnaire and copies of project materials (e.g. newsletters, exhibition boards, etc.). KGSL also contacted local schools.</p>

## 4. Non Statutory Consultation

### 4.1 Introduction

4.1.1 It is widely recognised that early engagement can help raise awareness of a project and influence the formal consultation process. Providing an opportunity for engagement at an early stage of the development process, allows the Developer to take account of points raised and for valuable insights to be considered as the Environmental Impact Assessment (EIA) progresses.

4.1.2 DCLG guidance also recognises the value of, and actively encourages, early non-statutory consultation, particularly with regard to technical information that can aid the development design process.

4.1.3 This chapter details how KGSL undertook early and on-going consultation with all statutory groups as part of the initial phase of engagement.

### 4.2 Early Non-Statutory Consultation

4.2.1 KGSL began by engaging with key stakeholders and organisations prior to the launch of the non-statutory consultation period.

4.2.2 In line with DCLG guidance, KGSL consulted with a wide range of interested stakeholders. KGSL employed a thorough consultation programme utilising numerous methods to inform stakeholders and provide varying opportunities to respond and provide feedback.

4.2.3 The approach and scope of the non-statutory period of consultation was detailed in a Statement of Engagement, which was submitted to both Cheshire West & Chester Council, Halton Borough Council and Cheshire East Council for consideration. The Statement of Engagement was drafted in consideration of guidance set out in each local authority's adopted Statement of Community Involvement (SCI) and was agreed as an appropriate scope. A record of the meetings during which the approach was discussed can be found in Appendix 12 and Appendix 13.

### 4.3 Meetings/Presentations

4.3.1 A meetings programme was undertaken throughout a period of early engagement on the project and the designated non-statutory consultation period. Face-to-face meetings were sought and carried out to give interested parties a chance to discuss the proposals and provide feedback. Meetings were a mix of one-to-one meetings as well as in groups.

4.3.2 Meetings prior and during the non-statutory consultation took place with:

- Member of Parliament for Halton
- Member of Parliament for Weaver Vale
- Member of Parliament for Eddisbury
- Leader of Cheshire West and Chester Council
- Leader of Halton Borough Council
- Leader of Cheshire East Council
- Cheshire West and Chester Council officers
- Halton Borough Council officers
- Cheshire East Council officers
- Members of the INEOS Site Community Forum, Runcorn
- Members of Byley Parish Meeting
- Members of Lostock Gralam Parish Council
- Members of Lach Dennis Parish Council
- Members of Middlewich Town Council
- Tenant farmers
- Local residents upon request

4.3.3 A meeting was offered to Councillor Mark Stocks, the local ward member for the site, however it was not possible to secure a meeting during the non-statutory consultation stage. KGSL hopes to arrange a meeting with Councillor Stocks during the next stage of consultation.

4.3.4 A summary of the points raised during these meetings and KGSL's responses can be found in section 5.4 of this document. KGSL also entered into early (and ongoing) negotiations with owners of land which may host proposed underground gas storage cavities.

#### **4.4 Communication/Consultation Methods**

4.4.1 Several communication methods were used to raise awareness of the proposed KGSP development and encourage participation in the consultation. Each deployed method is listed below:

##### ***Community Contact Points***

4.4.2 Contact channels were just some of the feedback mechanisms in place in order to provide a coherent and transparent approach to consultation and enable stakeholders to contact the Project Team. These included:

- Freepost Address: Freepost RSKS-SBBE-LHHZ, Keuper Gas Storage Project, c/o PPS Group, Hanover House, 30-32 Charlotte Street, Manchester, M1 4FD
- Freephone 0800 1777 250 (Monday to Friday 9.00am to 5.30pm)

— Dedicated email: [info@kgsp.co.uk](mailto:info@kgsp.co.uk)

4.4.3 These contact points were documented in a number of other consultation materials including the KGSP newsletter, project website, proactive letters and in responses to stakeholders.

#### **Letters**

4.4.4 Identified political stakeholders and key community stakeholders were informed of the project by letter (see Appendix 14). This correspondence was also simultaneously emailed to recipients. Stakeholders were contacted at the initial launch of the project and upon the official launch of the non-statutory consultation. Letters were followed up with phone calls to ensure receipt.

#### **Newsletters**

4.4.5 A six-page newsletter, specifically for KGSP, was circulated to all addresses within Consultation Zone A, totalling 813 addresses via post. This Consultation Zone included the settlements of Byley, Lach Dennis, Lostock Gralam, Whitley and Runcorn.

4.4.6 The newsletter (see Appendix 15) introduced KGSL's proposals; provided a two-page map of the proposed development areas; detailed the planning process and the projected timeline; publicised details of the Information Days; and included contact details of the Project Team.

4.4.7 The newsletter was also enclosed within letters to stakeholders and made available as a download on the KGSP website.

4.4.8 The newsletter acted as a 'take home' for those engaged throughout the consultation period and was available at all Information Days, the stakeholder workshop and key stakeholder meetings.

#### **Media**

4.4.9 In order to inform and update members of the wider community, KGSL took a proactive approach to engaging with local media outlets, actively seeking coverage to increase awareness of the proposal and increase participation.

4.4.10 A press release, titled '*Keuper Gas Storage and INEOS Enterprises announce intention to invest in further underground gas storage provision in Cheshire*' (see appendix 16) was circulated to the Northwich Guardian, the Runcorn Weekly News and Runcorn World on Tuesday 4<sup>th</sup> March 2014, during the initial launch of the project. This release introduced the project and the intention to consult. This prompted coverage in the local media (see appendix 17).

4.4.11 A press release, titled '*Public consultation launched on plans for further gas storage in Cheshire*' (see appendix 18) was circulated to the Northwich Guardian, the Runcorn Weekly News

and Runcorn World on Tuesday 22<sup>nd</sup> April 2014. This announced the launch of the informal consultation period and provided dates of the upcoming Information Days. This release was also covered in the local media (see Appendix 19).

4.4.12 Further coverage, prompted by media outlets, was published, with KGSL co-operating with journalists and providing an update on the project when requested (see Appendix 20).

### ***Advert***

4.4.13 In order to inform a wider audience of the consultation and associated events, adverts were placed in locally-circulating newspapers. These adverts (see Appendix 21) included the community contact points and website, a short description of the project and the dates, times and location of the Information Days.

4.4.14 The adverts appeared in the Northwich, Winsford & Middlewich Guardian, the Runcorn & Widnes World and Runcorn & Widnes Weekly News on Wednesday 30<sup>th</sup> April 2014. The circulation of the three media titles is 33,051.

### ***Website***

4.4.15 A project specific website ([www.kgsp.co.uk](http://www.kgsp.co.uk)) (see Appendix 22) was made live at the launch of the project in March 2014. This acted as a holding website with a description of the project and the development areas, as well as contact details for the project team.

4.4.16 The KGSP website was updated to coincide with the launch of the informal stage of consultation, which included the pages:

- Home: Description of the KGSP, latest news and information about the developer;
- The Project: Further details about the proposal and the need for gas storage provision;
- Plans: A diagram of the proposed KGSP development areas, featuring downloadable maps of each location;
- Consultation: Explanation of the proposed stages of consultation and details of how stakeholders can take part;
- Questionnaire: Online questionnaire regarding KGSP, in line with feedback forms used at the Information Days;
- FAQs: A list of Frequently Asked Questions and relevant responses from KGSL;
- Library: Application documents and consultation materials were available to download from this page;
- Get In Touch: Community contact points publicised.

4.4.17 Site statistics (see Appendix 23) show that from the launch of the updated website at the start of the informal consultation period (24<sup>th</sup> April 2014) to the end of this period (20<sup>th</sup> June 2014), there was a total of 2,025 page views, with 1,267 of these being unique views.

4.4.18 Of those that visited the site, 66.6% were new visitors whilst 33.4% were returning visitors, with the average time spent on the site being 4 minutes and 31 seconds.

4.4.19 The most-visited website page was the homepage (575 views), followed by the Plans page (407 views). The Consultation page was viewed 159 times, whilst the Questionnaire page garnered 113 views.

### **Public Information Days**

4.4.20 KGSL recognised the value of hosting Public Information Days to allow stakeholders to meet members of the project and development team and discuss the proposals in person. .

4.4.21 Five Information Days were held at a range of accessible venues, located in settlements most likely to be impacted by the proposed development. The events were attended by more than 56 people. Table 4.4.22 below provides details of the consultation events.

**4.4.22 Table: Details of KGSP Information Days**

Venue	Date	Time	Approx. attendance
Whitley Village Hall, Village Lane, Higher Whitley, Warrington, WA4 4EJ	Tuesday 6 <sup>th</sup> May 2014	2-8pm	6
Pavilions, Sandy Lane, Runcorn, Cheshire, WA7 4EX	Wednesday 7 <sup>th</sup> May 2014	2-8pm	6
Lostock Club, Works Lane, Northwich, Cheshire, CW9 7NW	Friday 9 <sup>th</sup> May 2014	2-8pm	5
Byley Village Hall, Moss Lane, Middlewich, Cheshire, CW10 9NG	Thursday 15 <sup>th</sup> May 2014	2-8pm	26
Lach Dennis Village	Friday 16 <sup>th</sup> May 2014	2-8pm	13

Hall, Holmes Chapel Road, Lach Dennis, Northwich, Cheshire, CW9 7SZ			
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4.4.23 Thirteen exhibition boards were displayed at each of the Information Days, introducing the proposal and the work being carried out as part of the development process.

4.4.24 The exhibition boards (see Appendix 24) were titled as follows:

- Keuper Gas Storage Project
- The Project
- The history of solution mining in Cheshire
- Why does the UK need gas storage?
- The main gas storage site
- What will the main gas storage site look like?
- How does it work?
- What's happening in Runcorn?
- What's happening in Whitley?
- Safety
- Environment
- Traffic
- The planning process

4.4.25 For those who were unable to attend the events, the exhibition boards were made available to download from the project website.

4.4.26 Attendees at the Information Days were asked to sign in upon arrival and provide their details if they wished to be kept updated.

4.4.27 The majority of those who attended took the opportunity to speak to members of the project and development team and ask questions of those in attendance. As a result, follow-up actions were noted and carried out following specific requests from attendees.

4.4.28 During the Information Days all attendees were encouraged to complete a feedback form (see below point 4.4.29).

***Feedback Forms***

4.4.29 Feedback forms (see Appendix 25) were made available during each of the Information Days and attendees were encouraged to complete a form and submit either via the ballot box provided at each Information Day, following the event via the project Freepost address or online via the website.

4.4.30 Owing to the early nature of engagement, the feedback form was designed to be accessible and easy to complete, including an opportunity to make general, or narrative, comments on the proposal. The forms allowed KGSL to capture views on the KGSP, with all completed forms logged and considered as part of the consultation process.

4.4.31 The feedback form focused on gauging which aspects of the proposed development respondents were most interested in, with a quantitative tick-list question providing several potential areas of impact. Respondents were also asked to expand with general comments on the application.

4.4.32 Questions were also asked about the nature of the Information Day and consultation. Feedback expressed on this subject has helped shape the approach to future consultation and has been considered when drafting the SoCC for the upcoming statutory stage of consultation.

4.4.33 A total of 18 feedback forms were received during the consultation period.

#### ***Online feedback forms***

4.4.34 As part of the inclusive approach adopted, aimed at encouraging participation from a range of stakeholders including hard to reach groups, the feedback form was made available to complete online at [www.kgsp.co.uk](http://www.kgsp.co.uk). This followed the same format detailed in paragraph 4.4.30.

#### ***Posters***

4.4.35 As well as directly informing those in Consultation Zone A about the proposal, posters (see Appendix 26) publicising the upcoming public Information Days were issued to key community venues. The posters included a short description of the Project, details of the events and the community contact points.

4.4.36 A list of the locations to which posters were issued can be viewed in Appendix 27.

#### ***Stakeholder Workshop***

4.4.37 In order to provide an additional forum for discussion and feedback, a stakeholder workshop was held. This provided an opportunity for stakeholders to discuss the proposal with the developers and helped KGSL further understand any concerns and issues at an early stage of the development process, before the period of statutory consultation.

4.4.38 A list of invitees for the stakeholder workshop can be viewed in Appendix 28.

4.4.39 The stakeholder workshop was held at Chester Racecourse on Wednesday 11<sup>th</sup> June 2014 from 12.30pm – 2.40pm. The venue was chosen as a central, accessible location in relation to the development area locations.

4.4.40 A total of 9 people took part in the workshop, including representatives from the Environment Agency, Halton Chamber of Commerce and Enterprise, Cheshire West and Chester Council and Halton Borough Council amongst others.

4.4.41 An agenda for the workshop can be found in Appendix 29.

4.4.42 The workshop provided an overview of the KGSL and INEOS Enterprises' businesses and the proposed development. Following this attendees split into two groups for a warm-up exercise and subsequent group discussion.

4.4.43 The main topics discussed at the workshop included:

- Economic benefits
- Security of gas supply
- Transport
- Health and safety
- Geology

4.4.44 Further details on the feedback received during the stakeholder workshop can be found in section 5.5 of this report.

4.4.45 A meeting report was produced following the event and agreed as an accurate record by attendees. This can be seen in Appendix 30.

#### ***Additional consultation tools***

4.4.46 KGSL recognised the importance of carrying out meaningful consultation with interested parties and therefore the need to be flexible in its approach to engagement.

4.4.47 In addition to the methods listed above, several other measures were undertaken at the request of consultees to raise awareness of the Project. These included:

- A presentation to Middlewich Town Council, during which display boards from the Information Days were used
- Information about the Project was included in a bulletin circulated by Halton and St Helens Voluntary and Community Action upon request
- Information about the Project and the Information Days was included in the Whitley Community Newsletter upon request

## 5.0 Summary of Responses

### 5.1 Introduction

5.1.1 This chapter provides a summary of the feedback received as part of the non-statutory consultation on KGSL's proposals for an underground gas storage facility in the Holford Brinefield and surrounding area, north of Middlewich in Cheshire. It provides an overview of the key issues raised by each of the consultee groups and the regard that KGSL has had to each point raised. In instances where changes have been made to the proposals as a result, this is noted and the alterations described. Where the applicant was unable to make changes or feedback will be considered as part of subsequent environmental assessments, this has also been highlighted.

5.1.2 Although KGSL was not obliged at this informal stage to ensure engagement with consultees detailed under the Planning Act 2008, consultation has been carried out with regard to the Act and relevant guidance.

5.1.3 This section details the responses received from consultees on the proposed KGSL application, including comments submitted in writing and via feedback forms available to complete at the public Information Days and online. This section has been split out into the different strands of activity in order to clearly demonstrate the feedback received via each channel and KGSL's response.

### 5.2 Responses arising from Scoping and engagement with prescribed consultees

5.2.1 Engagement with stakeholders identified as prescribed consultees has been undertaken prior to the launch of the non-statutory consultation period and remains ongoing. Following the launch of the project in March 2014, a Scoping Report Document was submitted. Following submission of this Report, consultees were contacted by letter, requesting a formal scoping response. A list of the organisations consulted as part of the scoping exercise can be found in Appendix 31.

5.2.2 Organisations that responded as part of the Scoping exercise included Cheshire West and Chester Council; Cheshire East Council; the Environment Agency; English Heritage; and Natural England amongst others. Full details of the responses and the Secretary of State's response can be found in the Scoping Opinion.

5.2.3 KGSL has considered all comments and recommendations raised during Scoping and has had regard to these when co-ordinating its programme of environmental assessments. The points raised will be addressed and outcomes detailed in the Preliminary Environmental Information Report (PEIR), which will be issued to all prescribed consultees to coincide with the launch of statutory consultation.

5.2.4 KGSL is in ongoing discussion with prescribed consultees and the relevant Local Authorities. Ongoing engagement with consultees will be logged and summarised in the final Consultation Report, submitted as part of the DCO application.

5.2.5 Representatives of prescribed consultees have also been engaged via meetings and a stakeholder workshop, details of which are available in the subsequent sections.

### **5.3 Responses arising from emails and phone calls**

5.3.1 Calls and emails made to the Project Team via the communication channels can be grouped in the following categories:

- ***Expressing an interest in the commercial aspects of the Project***

5.3.2 KGSL welcomes interest in the supply chain opportunities associated with the KGSP. Expressions of interest in supplying goods or services during construction and operation will be logged and each stakeholder contacted during the next stage of consultation.

- ***Registering to be kept updated about the project***

5.3.3 Some members of the community expressed an interest in the Project following the release of public consultation materials. Their details will be securely logged, as requested, and used to keep respondents up to date as the Project progresses.

- ***Clarification on the proposals***

5.3.4 The need for clarity on the proposed development and likely impact was raised in calls to the Information Line. KGSL responded to these enquiries by explaining the details of the proposal. In the main, it was communicated that the existing pipeline between the Holford Brinefield and Runcorn would not be used to transport gas.

- ***Responses to proactive engagement***

5.3.5 Many of the instances in which KGSL was contacted by a stakeholder was in response to proactive engagement from KGSL, for example returning a phone call or responding to a letter. Many of the emails received were responses to the Stakeholder Workshop invitation and launch letters.

- ***Requests for further information***

5.3.6 On occasion, stakeholders asked the Project Team for further information about the proposals, for instance to supply a map of the development area or make a request for a face-to-face meeting. KGSL responded positively to all meeting requests.

## **5.4 Responses arising from meetings/presentations**

5.4.1 Alongside formal consultation events, KGSL also attended several meetings to discuss the proposals, seek feedback on the scheme and answer questions about the proposed KGSP. A list of attendees can be found in section 4.3.2 of this report. A summary of the main areas of interest is presented below and accompanied by KGSL's response.

### ***Health and Safety***

5.4.2 Several questions surrounding safety and regulation of gas storage facilities were asked and safety was flagged as a main interest by stakeholders. Specific questions were asked regarding the COMAH licence associated with the facility, as well as the security measures to be in place at the wellheads.

### ***KGSL's response***

5.4.3 KGSL understands the perception of risk associated with underground gas storage and therefore the need to have in place stringent safety procedures. INEOS Enterprises is well-versed in operating at sites where a COMAH licence is required and has a proven track record in high safety standards. Construction and operation of the KGSP will be carried out to the same high standards and health and safety will be the number one priority.

5.4.4 Extensive measures will be in place to safeguard the local environment and will be secured through the COMAH licence. The downhole casing pipework for each cavity will feature three layers of high integrity steel tubing to prevent leaks, whilst the salt rock where the gas is stored is impervious to gas. Each wellhead will be surrounded by a security fence and will be under 24-hour CCTV surveillance. These measures will be secured by planning condition promoted as part of the DCO.

### ***Environmental and local impact***

5.4.5 Location of the wellheads and the potential impacts on nearby properties was raised by some attendees during stakeholder meetings. Two stakeholders raised concerns that the proposals could impact their property prices and asked for clarification on what INEOS' stance to buying residential properties. Some stakeholders addressed the topic of cumulative impact mainly that in addition to existing gas storage facilities, KGSP represented a further industrialisation of the area.

### ***KGSL's response***

5.4.6 Following consultation with consultees and members of the local community, several of the proposed cavity locations have been amended. A total of five cavities have been altered since early engagement on the project began. The cavities in question are H508, H509, H510, H511 and H515. Two of the updated locations are as a result of further analysis of the geology, whilst the remaining

three were as a result of comments from local residents/tenants regarding concerns over proximity to their properties. KGSL had regard to these issues and has made alterations to the proposed infrastructure as a result. The location of the updated cavities will be secured through the DCO.

5.4.7 Whilst KGSL understands the perception of an impact on property prices, there is no evidence to suggest that property prices fall when located near to gas storage infrastructure. INEOS will not consider financial compensation as part of KGSP or purchase of residential properties. At the request of one local resident, the KGSL project team has agreed to facilitate a site visit to prospective buyers of their property following concerns that the location could have an impact on the ability to sell. KGSL would consider a similar offer to other key stakeholders on a case by case basis.

### ***Employment and investment***

5.4.8 Some meeting attendees welcomed the jobs creation associated with the proposed KGSP and asked whether local people would be able to benefit from these jobs. They also asked about the supply chain opportunities associated with the proposals. Questions were also asked whether there would be a community benefit package with the plans.

### ***KGSL's response***

5.4.9 KGSL welcomes support with regard to job creation and potential economic gain for the region from further gas storage at Holford Brinefield. It is anticipated that up to 300 jobs during construction and 30 during operation would be created by KGSP. KGSL is keen to ensure that individuals and companies within the locality benefit from the proposals and is willing to work with the relevant local authorities and job centres in order to publicise opportunities to a local audience. KGSL has also agreed to present to members of the Halton Chamber of Commerce and will actively pursue engagement with other economic development groups within the region as the project progresses.

5.4.10 KGSL has had regard to feedback on community benefit and is currently considering what form a package could take. KGSL welcomes suggestions from community consultees and will continue to evaluate the possible methods of delivering some form of benefit to the community. This could involve an annual financial grant made available to local projects and bidders, in line with other packages associated with existing gas storage facilities in the area.

### ***Planning process***

5.4.11 The NSIP planning process and the timescales of the application were questioned by stakeholders. Questions were asked about the role the Local Authorities, local stakeholders and members of the community had to play in the process.

### ***KGSL's response***

5.4.12 KGSL detailed the NSIP process to stakeholders, explaining that due to the quantity of gas proposed to be stored it requires development consent. The application will be submitted to the Planning Inspectorate, with the final decision being made by the Secretary of State.

5.4.13 KGSL is committed to carrying out meaningful consultation and this will be one of the key considerations of whether to grant the DCO. Although DCO applications do not require approval from the local planning authority for consent, the host local authorities will be consulted as part of the DCO process and play an important role in the examination of the application. KGSL has sought to carry out meaningful engagement to inform and respond to feedback from stakeholders and members of the public.

### ***Traffic and transport***

5.4.14 Proposed routing of vehicles to and from the site was raised as an area of interest and attendees were keen to ensure that the surrounding villages were not adversely impacted. Potential impacts associated with the point of entry to the site from King Street, and its proximity to properties was also discussed.

### ***KGSL's response***

5.4.15 KGSL has taken account of feedback expressed during the non-statutory consultation period and historic feedback on the construction of existing gas storage facilities in the area. KGSL proposes to use the existing access point on King Street to access the development area, preventing traffic travelling through Byley. An internal, one-way construction routing system is being proposed for the main development site, this has been progressed and has evolved throughout the non-statutory consultation with the location of the proposed access roads updated following conversations with local tenants/residents. Measures to control construction traffic and HGV movements will be included within the DCO and where appropriate will be secured by either planning condition or development consent obligation.

### ***Consultation***

5.4.16 The opinion of stakeholders was sought on who KGSP should engage with prior to and during the non-statutory consultation period. Stakeholders also asked for information about who would be informed and consulted and how information would be circulated.

### ***KGSL's response***

5.4.17 Prior to embarking on non-statutory consultation, KGSL produced a Statement of Engagement outlining the scope and approach to consultation. This document was shared with the relevant local authorities for comment and agreed as an appropriate approach to informing and

engaging relevant stakeholders. KGSL has adopted a flexible approach to consultation, the methodology of which can be found in Section 4.2.

### **Runcorn**

5.4.18 Aspects of the proposal specifically relevant to the Runcorn development area were also asked about by those who attended face-to-face meetings. They questioned the potential environmental impact of discharging brine and highlighted the appearance of any proposed pipe bridges as an area of interest. Another commonly asked question, as experienced via the Information Line calls, was whether gas would be stored or transported to Runcorn via the existing pipeline.

#### ***KGSL's response***

5.4.19 KGSL has regularly communicated throughout the consultation that the existing pipeline between the Holford Brinefield and Runcorn will not be used to transport gas but will continue to be used to transport brine.

5.4.20 INEOS Enterprises currently holds an Environmental Permit, granted by the Environment Agency, to discharge brine into the Weaver Navigation. This sets limits on the amount that can be released and the locations at which this is permitted. KGSL communicated to stakeholders that it was considered that brine discharge would not have a significant impact on salt concentrations and existing habitats. Discharge and effects of brine were fully assessed and accepted by the EA as part of the EIA undertaken as part of the application for license to discharge. Further details of which will be available during subsequent statutory consultation

5.4.21 KGSL will fully consider any impact associated with any pipe bridges proposed as part of the KGSP development in Runcorn. Once a design has been fixed, KGSL will ensure to actively consult with water users and local stakeholder groups regarding the proposed development.

## **5.5 Responses arising from the stakeholder workshop**

5.5.1 KGSL also sought to engage with key stakeholders by hosting a stakeholder workshop, aimed at encouraging open discussion about the opportunities and issues associated with the proposals. An outline of how the stakeholder workshop was undertaken can be found in the methodology section (section 4.x) of this Report.

5.5.2 Figure 5.5.3 below provides a summary of the main issues discussed and viewpoints expressed during the workshop and KGSL's response during the non-statutory consultation period.

### **5.5.3 Figure – Stakeholder workshop discussions and KGSL's response**

Topic of discussion/feedback	Response
<p><b><u>Economic Benefits</u></b></p> <ul style="list-style-type: none"> <li>Attendees welcomed the number of jobs associated with the proposals and that these would be of good quality, high skilled positions.</li> <li>It was noted that, in addition, the Project also supports other businesses in the area which rely on brine from INEOS. The importance of contributing to the future operation of INEOS Chlor Vinyls was stated.</li> <li>Attendees asked about the types of jobs on offer and whether the workforce would be sourced from the local area.</li> </ul>	<p>The proposed KGSP would create up to 300 jobs during construction and 30 during operation. INEOS has a number of other sites in the UK, particularly the North West, that provide skilled positions for people living in the region. For example, INEOS ChlorVinyls' chemical operations at Runcorn employs over 900 people.</p> <p>Delivery of KGSP will represent a significant investment in the local economy and provide a long term brine supply to meet the needs of existing customers in the region.</p> <p>Whilst it is not possible to specify supply chain companies at this stage of the planning process, previous projects have used local contractors and employed members of the local workforce. Throughout the consultation, KGSL has been contacted by companies requesting to express an interest in becoming a supplier for the development. KGSL will keep a log of those who have expressed an interest for use when suppliers are acquired.</p> <p>KGSL has also been in liaison with the relevant Chambers of Commerce and will publicise opportunities to local businesses via this and other means. KGSL intends to continue to liaise with local business groups as the project progresses.</p>
<p><b><u>Energy security</u></b></p> <ul style="list-style-type: none"> <li>Attendees felt that the project's contribution to securing a flexible gas supply for the UK was a positive.</li> <li>Workshop participants were keen to learn the details of how gas is stored on site and how it is moved around the gas network.</li> </ul>	<p>Gas storage provides a secure and flexible source of energy for the UK. A domestic supply is needed to respond to variable demand, for example when demand for gas and electricity is greater during colder winter months.</p> <p>The Government has recognised the importance of gas storage, calling for capacity to double by 2020. KGSP will help to secure the domestic supply of gas in the UK.</p>
<p><b><u>Ecology and environment</u></b></p> <ul style="list-style-type: none"> <li>Some attendees raised concerns about the potential impact on local rivers and</li> </ul>	<p>KGSL has had regard to feedback regarding environmental considerations and has adopted a thorough assessment programme. The Environmental Impact Assessment (EIA),</p>

<p>water course during construction</p> <ul style="list-style-type: none"> <li>• It was raised that there is a SSSI not far from the proposed site and attendees asked how this would be protected</li> <li>• Impact on otters was raised as a potential area of concern.</li> <li>• The potential impact of purging brine into the Weaver Navigation was highlighted, particularly with regard to salt concentration levels.</li> <li>• Attendees asked whether any noise would be generated by the drilling process.</li> </ul>	<p>which will form part of the DCO application, will consider any potential impact on water courses and habitats. An Environmental Management Plan will also be prepared to ensure any potential impacts are mitigated. The assessments will also take into account the SSSI. Once operational, the majority of activity takes place below ground meaning there is a limited impact on surface ecology. Further detail of the findings of these assessments will be available during the statutory consultation period. The environmental assessments will take into account a wide scope of habitats and species, including otters. Noise will also be assessed as part of the EIA.</p>
<p><b><u>Transport</u></b></p> <ul style="list-style-type: none"> <li>• Transport, particularly during the construction period, was identified as one of the central concerns, with attendees enquiring about how this would be managed.</li> <li>• Participants raised concerns about HGV traffic on King Street and the surrounding road network.</li> </ul>	<p>KGSL has taken account of previous gas storage projects in the area, during which construction traffic was routed through Byley village. This in turn caused concern and complaints from members of the community. Drawing on this feedback, KGSL proposes to use the existing access point on King Street to access the development area, preventing traffic travelling through Byley. An internal, one-way construction routing system is being proposed for the main development site, this has been progressed and has evolved throughout the non-statutory consultation with the location of the proposed access roads updated following conversations with local tenants/residents. The agreed construction routing system will be secured through the DCO.</p> <p>KGSL has had regard to feedback regarding vehicle movements and routing, which will be considered in depth as part of the EIA. This will outline how additional movements associated with the development will be mitigated, for example construction will be phased in order to mitigate the effects of additional traffic flow. The level of vehicle movements and routing will be secured through the DCO.</p>

<p><b><u>Health and Safety</u></b></p> <ul style="list-style-type: none"> <li>• Potential safety concerns, such as gas leaks and explosions, were raised by participants, who also asked about the levels of security to be in place at the wellheads.</li> </ul>	<p>Health and safety is the top priority for KGSL and INEOS Enterprises. The proposed gas storage facility will have to meet safety standards that are amongst some of the most stringent in the world and the site will be required to meet standards governed by the Control of Major Accident Hazards (COMAH) Regulations 1999.</p> <p>Extensive measures will be in place to safeguard the local environment and we be secured through KGSP’s COMAH licence. Pipework for each cavity will feature downhole casings to prevent leaks, whilst the salt rock where the gas is stored is impervious to gas.</p> <p>Each wellhead will be surrounded by a security fence and will be under 24-hour CCTV surveillance.</p>
<p><b><u>Geology</u></b></p> <ul style="list-style-type: none"> <li>• Participants asked about the geology of the site and how it is assessed. The presence of the King Street fault was raised.</li> <li>• The potential for subsidence at the surface was raised as a concern.</li> <li>• Questions about the structural integrity of the cavities were asked, as well as how the cavities are maintained.</li> </ul>	<p>INEOS Enterprises has extensive knowledge of the geology at the Holford Brinefield, where INEOS Enterprises’ Brine &amp; Water business has been solution mining the Holford Brinefield for over 80 years. Location of the cavities has been determined based on a detailed understanding of the geology of the area, reinforced by results of seismic surveys undertaken of the area. The presence of the King Street fault has been considered in detail as part of this process and the proposals have been designed to avoid this.</p> <p>The locations of the proposed cavities have been designed to take advantage of the most favourable geological positions, with the locations of some cavities amended to take account of this.</p> <p>Having regard to concerns during operation of the facility, design and operation will be carried out to ensure that no surface subsidence will occur, with a regular monitoring schedule to be put in place to verify this. Sonar technology will also be used throughout construction and operation to monitor cavity integrity.</p>

5.5.4 Given the constructive feedback and discussion about the application during the workshop, KGSL intends to stage another similar workshop during the statutory consultation phase.

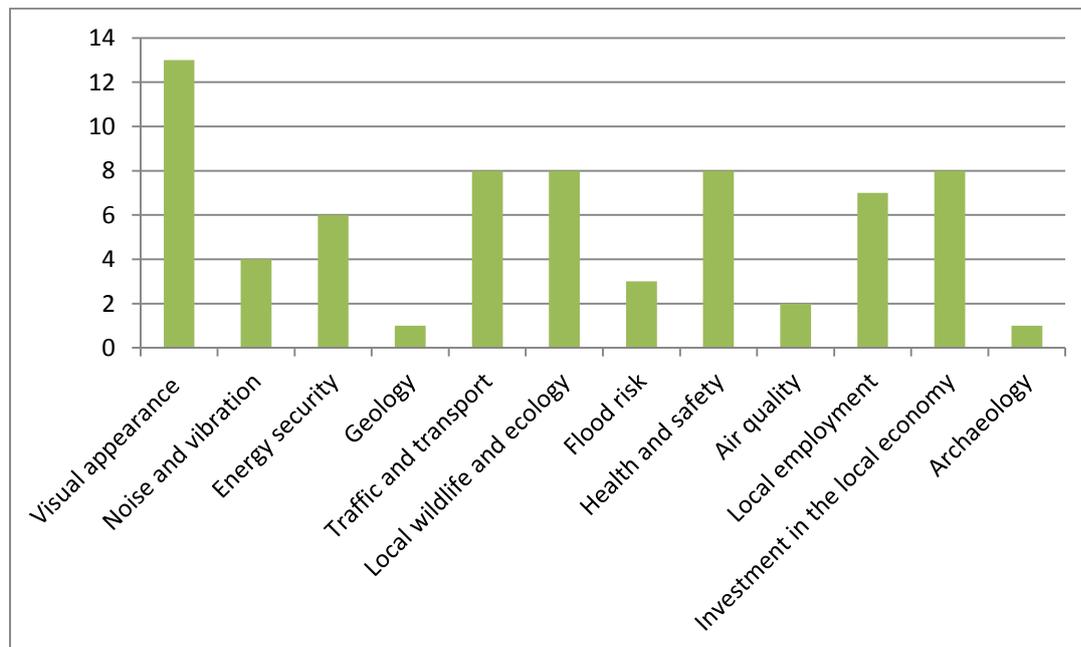
## 5.6 Responses arising from feedback forms and Information Days

5.6.1 The main form of wider public engagement was via a series of five Public Information Days, during which feedback forms were made available. A full summary of the approach can be viewed in section 4.4 of this Report.

5.6.2 All attendees at the Information Days were encouraged to complete and submit a feedback form. KGSL received 16 physical feedback forms either during the Information Days or returned via Freepost after the event. One person completed the feedback form online, whilst one respondent submitted their form in an email format.

5.6.3 Respondents were asked ‘Which areas relating to the proposal are most important to you?’ as part of the feedback form. The options and response rate is displayed in the below Figure 5.6.4.

5.6.4 Figure – Which areas relating to the proposal are most important to you?



### ***Investment in the local economy***

5.6.5 Of those that completed feedback forms, 8 people ticked that ‘investing in the local economy’ was important to them.

5.6.6 In some instances, respondents made additional comments regarding the provision of community benefit associated with the development of the proposed underground gas storage cavities. Comments included:

- “As this is so close to Middlewich, could the town please be included in the community fund arrangements.”

- “If this development goes ahead, we would hope for a Community Fund similar to those provided by EON and STORENGY.
- “Why is it that we will be storing gas all round Byley and none of us have a gas supply. I think it would be good public relations if at least you could offer it to those who would like it.”

### ***KGSL’s response***

5.6.7 KGSL has taken on board the comments made in relation to investment in the local economy and had regard to opinions expressed.

5.6.8 It was communicated during the consultation period that INEOS Enterprises and KGSL are committed to giving something back to the communities in which it operates. KGSL has been considering the options for community benefit and expects to provide a similar fund as that in place for other existing gas storage facilities at the Holford Brinefield. This could involve £20,000 being made available for local community projects each year during construction.

5.6.9 KGSL communicated throughout the consultation period that it would be receptive to community benefit ideas and informally sought feedback on what form of benefit members of the community and key stakeholders would see as preferable.

5.6.10 KGSL is not in a position to provide direct gas supply to residential properties. Such provision would be considered and provided by National Grid.

### ***Visual appearance***

5.6.11 Of those that submitted responses via feedback forms, 13 respondents said that ‘visual appearance’ was an important aspect for them when considering the proposals.

5.6.12 Some chose to expand on their views regarding visual appearance in the subsequent comments section. Those submitted included:

- “There will have been options around the positioning of well heads, some of which are close to residences. Will there be an opportunity to discuss the specific siting of well heads?”
- “The plans showed measures - earth banks and planting of trees and shrubs - to mask the visual impact of the well heads. Is the contractor committing to these measures?”
- “What measure have been considered to limit the impact of light pollution around proposed well heads and sites? Light is already an issue around existing well heads.”
- “Visual impact is very important and design should focus on this ahead of cost implications.”

### ***KGSL’s response***

5.6.13 KGSL has taken on board feedback received regarding visual appearance of the infrastructure and how the wellheads will appear from the surrounding communities. KGSL has had regard to opinions expressed regarding specific wellheads and their proximity to nearby properties. As a result, the location of three cavities has been modified since the start of the non-statutory consultation period.

5.6.14 KGSL is committed to fully assessing the visual implications of the proposed development. This will be considered in detail as part of a Landscape and Visual Impact Assessment (LVIA) to be undertaken as part of the EIA. Mitigation measures have already been proposed, including planting, landscaping, appropriate paint colours and screening. These have been tailored as a direct result of the non-statutory consultation based on informal discussions with local residents. These mitigation measures will form part of the DCO application and will be required to be delivered as part of a consent.

### ***Noise and vibration***

5.6.15 Of those that submitted responses via feedback forms, 4 people said that noise and vibration was an aspect of the proposals that was important to them. One person chose to expand on this point in the general comments section:

- “Noise pollution is also a problem particularly when there is work around well heads with the regular intrusion of reversing sirens. Recognising that this is a safety issue, what measure have been considered to minimise the impact of noise e.g. smaller machines, infrastructure to deflect or dampen noise?”

### ***KGSL’s response***

5.6.16 Noise and vibration will be assessed in detail as part of the EIA. The assessment will consider the potential for noise during construction and operation of the proposed KGSP and a ‘worst case scenario’ assessment of the noise will be made. Current baseline noise measures will be used to establish any potential impacts associated with the development and, if necessary, mitigation measures will be proposed and adherence to these measures will be secured through the DCO.

### ***Energy security***

5.6.17 Of the respondents to complete the feedback forms, 6 people indicated that energy security was an area of interest. Linked in with the wider theme of energy security, one respondent asked the supplementary question:

- “Do we really need a third gas plant when there are already two in close proximity (EON and STORENGY)?”

### ***KGSL's response***

5.6.18 Cheshire's geology means it is one of the few places in the UK where gas can be safely stored underground, proven by existing gas storage facilities in operation in the area. Over a quarter of the UK's electricity is generated from gas and we rely heavily on imports from overseas. Investing in further gas storage at Holford Brinefield will help to provide a flexible and secure supply for the UK.

5.6.19 The need for additional gas storage capacity has been acknowledged by the Department for Energy and Climate Change, with a report published in 2011 calling for capacity to double by 2020. The National Policy Statement for Energy highlights the need for gas storage and infrastructure in response to significant increases in net imports of natural gas expected to occur between 2010 and 2025.

### ***Geology***

5.6.20 Of those that responded via feedback form, one person selected geology as being an important aspect of the development. Information Day attendees had conversations with members of the KGSL Project Team about the geology in the area and suitability for gas storage.

### ***KGSL's response***

5.6.21 INEOS Enterprises has a detailed understanding of the geology of the Holford Brinefield, having carried out solution mining for over 80 years. Over 200 cavities have since been developed for brine production in that time. Additional seismic surveys have recently been carried out to inform the early development of the KGSP and identify the optimum cavity locations.

### ***Traffic and Transport***

5.6.22 A total of 8 people said that traffic and transport was an important aspect of the development for them. Although no respondents formally raised the issue of traffic and transport on the general comments section of the forms, several attendees asked verbally about vehicle movements associated with the developments during the Information Days, particularly during the event at Byley Village Hall.

5.6.23 General commentary focused on the construction of other gas storage projects in the area and concerns were raised about construction traffic travelling via local villages. Attendees were also keen to learn about how vehicles would access the site during construction and what measures would be in place to mitigate against traffic impact.

### ***KGSL's response***

5.6.24 KGSL has taken account of previous gas storage projects in the area, during which construction traffic was routed through Byley village as this route caused concern and complaints from members of the community. Drawing on this feedback, KGSL proposes to use the existing access point on King Street to access the development area, preventing traffic travelling through Byley. An internal, one-way construction routing system is being proposed for the main development site, this has been progressed and has evolved throughout the non-statutory consultation with the location of the proposed access roads amended following conversations with local tenants/residents. Measures to control construction traffic and HGV movements will be included within the DCO and regulated by planning condition or development consent obligation.

5.6.25 KGSL has had regard to feedback regarding vehicle movements and routing, which will be considered in depth as part of the EIA. This will outline how additional movements associated with the development will be mitigated, for example construction will be phased in order to mitigate the effects of additional traffic flow and will be secured through the DCO.

### ***Local wildlife and ecology***

5.6.26 Of those that completed feedback forms, 8 people indicated that local wildlife and ecology was an important aspect of the project, although no one expanded on this topic in the general comments section. An option for 'other' areas of interest was provided on the feedback form. Two respondents used this section to comment on aspects of the development which could be associated with the local wildlife, ecology and potential wider impact of the development. The comments are below:

- "Further "industrialisation" of a greenfield site and agricultural land."
- "Agricultural disturbance."

### ***KGSL's response***

5.6.27 Any potential impact on the ecology of the site, including habitats and wildlife species, will be fully assessed as part of the EIA. The proposed Project is not located within any statutory or non-statutory nature conservation designations, however assessments will consider potential impact of the development. Surveying of local species is ongoing and where appropriate, mitigation measures will be proposed to avoid, minimise or reduce adverse impacts.

It is considered likely that a badger licence (s.10 of the Protection of Badgers Act 1990) and a Great Crested Newt licence (Regulation 53 of the Conservation of Habitats and Species Regulations 2010) will be required. Applications for these licences will be progressed separately outside of the DCO.

### ***Flood risk***

5.6.28 Three respondents flagged flood risk as an area of interest, with one participant asking:

- “Flood risk – is there one?”

#### ***KGSL’s response***

5.6.29 A flood risk assessment will be undertaken as part of the EIA considering the potential for both fluvial (watercourse) flooding and ground water flooding. The strategy for the management of surface water at the site will be developed as part of this assessment.

#### ***Health and safety***

5.6.30 Health and Safety was selected as an important aspect of the proposal by 8 feedback form respondents.

#### ***KGSL’s response***

5.6.31 Health and safety is the top priority for KGSL and INEOS Enterprises. The proposed gas storage facility will have to meet safety standards that are amongst some of the most stringent in the world and the site will be required to meet standards governed by the Control of Major Accident Hazards (COMAH) Regulations 1999. Extensive measures will be in place to safeguard the local environment and will be secured through the COMAH licence. The downhole casing pipework for each cavity will feature downhole casing with three layers of high-integrity steel tubing to prevent leaks, whilst the salt rock where the gas is stored is impervious to gas. Each gas wellhead will be surrounded by a security fence and will be under 24-hour CCTV surveillance.

#### ***Air Quality***

5.6.32 Of those that completed forms, two people selected air quality as being an area of interest. No respondents expanded on this in the ‘general comments’ section.

#### ***KGSL’s response***

5.6.33 The EIA to be undertaken as part of the planning process will assess air quality and any potential impacts associated with the proposed KGSP. A study area for this assessment will include residential receptors within 1km of the main assessment area. The study will consider impacts that may arise during both construction and operation of the proposed KGSP. Details and emerging findings of these assessments will be available during the upcoming statutory consultation period.

#### ***Local employment***

5.6.34 Seven respondents said that local employment was an important aspect of the proposal, however no follow-up questions were asked in relation to this topic.

***KGSL's response***

5.6.35 It is anticipated that up to 300 jobs during construction and 30 during operation would be created by KGSP. KGSL is keen to ensure that individuals and companies within the locality benefit from the proposals and is willing to work with the relevant local authorities and job centres in order to publicise opportunities to a local audience. KGSL has also agreed to present to members of the Halton Chamber of Commerce and will actively pursue engagement with other economic development groups within the region as the project progresses.

***Other areas of interest***

5.6.36 In addition to the anticipated areas outlined above, respondents were also asked 'Do you have any comments you would like to make?' It was in this section that respondents raised additional areas of interest and asked supplementary questions.

5.6.37 Some respondents provided positive feedback on either the proposals or the Project Team. Submitted comments included:

- "A very interesting hours' talk about the future of gas storage."
- "This appears to be a well-thought out scheme which would have minimal impact to the local population and environment."
- "I do appreciate the benefits and importance of the project, but feel the local community have to be kept informed."
- "[Project team member] was very helpful at the meeting in Byley Village Hall."

5.6.38 One respondent used this section to raise general opposition to the proposed project due to impact on the surrounding villages:

- "This project will spoil the village of Byley. During construction there will be a lot of upheaval of the fields, hedges etc. We have seen this during the construction of the EON site and the Store Energy site. The farmers of the land will be the ones who suffer the most. KGSP seems to have a huge financial back up. They think they can buy us off. Once they have got permission to develop the site, will they sell it to another company?"

***KGSL's response***

5.6.39 KGSL has welcomed all feedback on the proposed development received during the non-statutory consultation on the application. The Applicant will continue to update those who have taken an interest in the Project and participated in the non-statutory stage of consultation and encourage engagement during the future statutory stage of consultation.

5.6.40 KGSL recognises that there may be specific concerns raised regarding the environmental impact of the Project. The Applicant, in accordance with legal and policy requirements, and good neighbour relations will aim to remove or reduce all potential negative impacts identified during the EIA. Careful consideration is being given to the potential positive and negative impacts of the Project during construction and operation which will be detailed in an Environmental Statement (ES) submitted as part of the DCO application process. KGSL has made several updates to its proposed development to help mitigate impact at a local level.

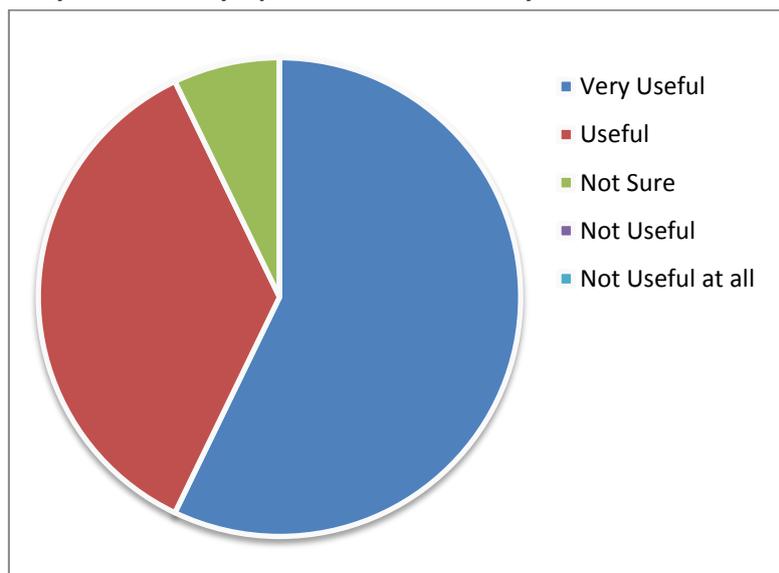
5.6.41 KGSL is applying for consent to construct, operate and decommission the KGSP. There are currently no plans in place to sell the Project to an operator, however this is a commercial matter which will be considered at a later date. Mitigation measures to reduce environmental impacts will be secured through the DCO application and will be binding on KGSL (or any future operator).

### The Information Days and consultation

5.6.42 In order to gauge attitudes to the consultation approach and information provided KGSL asked respondents their thoughts on the Information Days, and how useful they were deemed by attendees.

5.6.43 Of the 18 feedback forms submitted, 14 people answered the question 'Did you find today's public information day useful?'. The responses provided to this question can be viewed in the Figure 5.6.44 below. A total of 8 people said they thought the information day was 'very useful', 5 selected 'useful', whilst one person said they were not sure. No respondents said that the Information Day was 'not useful' or 'not useful at all'.

5.6.44 Figure – 'Did you find today's public information day useful?'



5.6.45 KGSL also asked a supplementary qualitative question on the Information Days, allowing for respondents to make comments about the application. Responses are listed below:

- “Being a very technical process, the attendance of 'experts' to explain certain aspects was essential.”
- “Not sure if today's information day was useful.”
- “Useful and informative.”
- “Very comprehensive information.”
- “Very friendly staff. Lots of info on the displays.”
- “I don't think many people were aware of it.”
- “No postal information received.”
- “My main issue at the moment is the very fact that we have received no information at all through the post - I have been informed this is because we are out of the 2.5km zone of where packs and plans etc. have been received through the post. I do feel a little angry about this as we are part of the community and I feel it does affect us. My children are at the school in Byley and again as parents I feel we should be informed as the plans are again near the school. I feel we should also be given information when the survey was done at the end of 2013 - I know farm and land owners were informed but as householders it was very disconcerting to see great big vehicles and men looking at the fields that surround the house.”

5.6.46 Representative of the KGSL Project Team also had discussions with attendees at the exhibitions, at which verbal comments on the consultation and access to information were made. At least two members of the public said they had been made aware of the proposals via wider publicity and word of mouth, but asked why they had not be contacted directly about the application or received a project newsletter.

5.6.47 Another specific point raised verbally by attendees of the public exhibition was regarding the spread of information via local schools, in particular Byley Primary School. Attendees expressed their opinion that it would be preferable for parents of children at the school to be kept updated and made aware of consultation events via the school.

#### ***KGSL's response***

5.6.48 KGSL welcomes positive feedback on the approach to consultation and level of detail provided at consultation events, such as the Information Days.

5.6.49 The applicant has had regard to all comments made regarding the level of information provided and the approach and scope of the consultation. In relation to positive comments about the level of detail provided, KGSL will continue to provide in-depth detail when engaging with members of the public and consultees. Proposed statutory consultation will include further detail on the proposals and the detailed assessments undertaken as a part of the preparation of the ES.

Future Information Days will also be staffed by representatives with technical knowledge of the proposals, to ensure any questions can be addressed in detail throughout engagement on the Project.

5.6.50 KGSL notes the specific comment regarding people 'not being aware' of the Information Day. KGSL notes that this comment was made specifically in regard to the additional consultation event held for the benefit of Middlewich Town Council. This event was for the benefit of members and was hosted at request of the Town Council.

5.6.51 With regard to some attendees not receiving information about the proposals, KGSL explained the approach to consultation, in particular the Consultation Zones agreed with the relevant local authorities during preparation of the consultation strategy. It is understood that those who did not receive information did not reside within the 2.5km radius Consultation Zone A for the main development site at the Holford Brinefield and surrounding area, to the north of Middlewich. With regard to such feedback, KGSL proposes to extend the Consultation Zone A around the main site to a radius of 3.5km for the upcoming statutory consultation period. This extension will ensure that a greater number of residents and businesses are contacted directly about the proposal and statutory consultation process. This extension will see the number of properties directly contacted at the main site increase from 226 to over 1600.

5.6.52 KGSL has considered the suggestion for information to be provided via local schools and has had regard to the request. As part of the statutory consultation on the proposals, KGSL will ensure that local schools are engaged and that information, where possible, is circulated to members of the public via these channels. As a result of feedback, KGSL has contacted Byley Primary School in particular to request that information be issued to parents at forthcoming consultation periods. The school has indicated that this would be acceptable and KGSL can commit to carrying out this activity during future periods of consultation on the application.

## 6. The Statement of Community Consultation (SoCC)

6.1 KGSL is committed to undertaking thorough and comprehensive pre-application consultation on the proposed KGSP. The programme of non-statutory consultation has been developed on this principle and KGSL intends to maintain the proactive approach to engagement throughout the statutory consultation period.

6.2 In preparing for statutory consultation on the application, and in accordance with the Act and relevant guidance, KGSL has prepared and published a Statement of Community Consultation (SoCC) that details the scope of consultation and methods to be employed to inform stakeholders about the proposed development and encourage participation.

6.3 KGSL has incorporated feedback received to date on the consultation approach into the draft SoCC, resulting in a document that reflects comments made throughout early engagement and the non-statutory consultation. Evidence of this includes the increase in the size of Consultation Zone A at the main site at the Holford Brinefield. KGSL has also paid particular attention to hard to reach groups and carefully considered how to engage those who may socialise or work close to the development areas as well as those who live in the area.

6.4 In order to provide an opportunity for comment on the proposed approach to statutory consultation, KGSL informally shared the draft SoCC with the relevant local authorities prior to undertaking a 28-day period of formal consultation on the document, as required by the Act.

6.5 Following the formal consultation period on the SoCC, both Cheshire West and Chester Council and Halton Borough Council confirmed to the Applicant that, in their view, the suggested approach would be sufficient to ensure the community is adequately consulted on the proposed development. Neither local authority proposed any amendments to the draft SoCC.

6.6 The finalised SoCC will be published at the launch of statutory consultation and will be widely publicised, with measures including making the document available for inspection at venues local to the development areas, at future Information Days, available to download from the Project website and proactively circulating the document.

## 7. Conclusions and next steps

7.1 This Interim Consultation Report sets out how KGSL has undertaken non-statutory consultation in advance of the submission of a DCO application for its proposals for underground gas storage cavities at the Holford Brinefield and surrounding area, to the north of Middlewich, Cheshire.

7.2 Although non-statutory, this consultation has been carried out with regard to the Act in order to ensure the process was inclusive, thorough and meaningful. This is evidenced throughout this Interim Consultation Report.

7.3 The period of consultation detailed in this report is part of a phased approach being undertaken by the Applicant. Feedback from the non-statutory stage has enabled members of the community and prescribed consultees to have input into the development of the application from an early stage, whilst key issues raised have helped shape the scope of the ES and the Project itself.

7.4 Feedback submitted by members of the community has also been valuable in enabling the Applicant to understand potential issues and perceptions within surrounding communities, and ensure these are adequately addressed in future rounds of consultation. Information and views expressed during engagement has been taken on board and regarded at each stage of the application process and will inform the approach to statutory consultation, intended to be undertaken before the end of 2014.

7.5 Having logged and considered all responses during the non-statutory consultation period, KGSL plans to formally consult on its proposals later this year. As part of the preparation for the statutory consultation, and in accordance with the Act and relevant guidance, KGSL has prepared a Statement of Community Consultation (SoCC) outlining the approach and scope of proposed statutory consultation.

7.6 The thorough and proactive approach to consultation demonstrated to date will be maintained throughout the statutory consultation stage, which will be undertaken in full accordance with the agreed SOCC.

7.7 In the interim between periods of consultation, KGSL has maintained the established communication channels (including the Project Website, Freephone, Freepost address and dedicated email) to enable consultees to contact members of the Project Team, provide feedback and seek information on the proposals. A log of all engagement, either proactive or reactive, undertaken during this period has been kept and a summary will be included in future consultation reports.

7.8 Once all consultation has been carried out on the proposals, KGSL will draft and publish a detailed Consultation Report, demonstrating the feedback received and how the applicant has had