PREESALL UNDERGROUND GAS STORAGE FACILITY,
LANCASHIRE

Infrastructure Planning Commission (IPC) Application
Reference Number: EN030001

STATEMENT OF COMMON GROUND BETWEEN HYDER CONSULTING (UK) LIMITED (ON BEHALF OF HALITE ENERGY GROUP LIMITED) AND ENGLISH HERITAGE (MARINE PLANNING UNIT) ON THE TOPIC OF ARCHAEOLOGY AND BUILT HERITAGE

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English Heritage (Marine Planning Unit) Letter Dated 1 March 2012
1 INTRODUCTION

1.1.1 This is a Statement of Common Ground (SoCG) between Hyder Consulting (UK) Limited (Hyder) (on behalf of Halite Energy Group Limited) and English Heritage (EH) (Marine Planning Unit) on the topic of Archaeology and Built Heritage. This SoCG relates to the marine archaeology and built heritage of the Project only. A separate SoCG between Hyder and English Heritage has been produced relating to terrestrial archaeology and built heritage.

1.1.2 Marine Archaeology has been the subject of discussions between Hyder (on behalf of Halite Energy Group Limited) and EH (Marine Planning Unit) at the pre-Development Consent Order (DCO) Application stage. A telephone conversation was held with Christopher Pater of EH (Marine Planning Unit) on 5 March 2012 at 11am to discuss the Archaeology and Built Heritage SoCG. The aim of this discussion was, where possible, to reach a common ground in relation to the following DCO Application Documents:

- Chapter 7: Archaeology and Built Heritage of Volume 1A of the Environmental Statement (ES) (DCO Application Document Reference 5.1)
- Appendices 7.2 and 7.3 of Volume 1B of the ES (DCO Application Document Reference 5.2)
- Figure 7.1 of Volume 2B of the ES (DCO Application Document Reference 5.4)

1.1.3 EH (Marine Planning Unit) issued a formal letter dated 1 March 2012 in response to the ES submitted for the Project. The contents of this letter were discussed during the telephone conversation held on 5 March 2012. This letter is presented within Appendix A of this SoCG.

1.1.4 It should be noted that the agreements made within this SoCG are in relation to the elements that are within EH (Marine Planning Unit’s) interest.
2 ACCEPTED DATA

2.1 Assessment Methodology

2.1.1 The methodology sets out the approach to the Archaeology and Built Heritage assessment, and is presented within Section 7.3 of Volume 1A of the ES.

2.1.2 The assessment methodology is considered appropriate and agreed.

2.2 Baseline Information

2.2.1 Sections 7.4 and 7.5 of Volume 1A of the ES present the existing and future baseline information, respectively, that has been considered in relation to the Archaeology and Built Heritage assessment.

2.2.2 The baseline information is considered appropriate and agreed.

2.3 Mitigation and Enhancement Measures

2.3.1 Mitigation and enhancement measures are identified within Section 7.8 of Volume 1A of the ES.

2.3.2 The mitigation and enhancement measures are agreed.

2.3.3 Although the mitigation and enhancement measures are agreed, EH sought confirmation that a Written Scheme of Investigation (WSI), covering the proposed mitigation measures, will be produced in agreement with EH, Lancashire County Council (LCC), the Marine Management Organisation (MMO) and any other relevant bodies. Hyder confirms that the DCO Requirements contain provisions for a WSI, and EH accepts the terms of the DCO requirements are satisfactory. Hyder also confirms that the Deemed Marine Licence required for the Project will be modified to include a new condition providing for the WSI.

2.3.4 EH notes that the MMO has agreed the borehole survey work itself will be a licensable activity, and a separate marine licence can be applied for once the DCO has been made. EH is satisfied with this approach.

2.4 Assessment Findings

2.4.1 Section 7.7 of Volume 1A of the ES presents the Potential Effects on Archaeology and Built Heritage, including marine archaeology, as a result of the Project without consideration of the proposed mitigation and enhancement measures. Section 7.9 of Volume 1A of the ES presents the Residual Effects, i.e. with incorporation of the proposed mitigation and enhancement measures.

2.4.2 The findings of the assessment are agreed.
3 DATA NOT ACCEPTED

3.1.1 There are no elements of the documents identified within Section 1.1.2 of this SoCG that are not agreed.
STATEMENT OF COMMON GROUND

This Statement of Common Ground on the topic of Archaeology and Built Heritage has been prepared by Hyder Consulting (UK) Limited, on behalf of Halite Energy Group Limited, and agreed by English Heritage (Marine Planning Unit).

Signed:  
Christopher Pater  
on behalf of English Heritage (Marine Planning Unit)  
Date: 10th May 2012

Signed:  
Jenny Wylie  
on behalf of Hyder Consulting (UK) Limited  
Date: 11 May 2012
Appendix A

English Heritage (Marine Planning Unit) Letter Dated 1 March 2012
Dear Ms Wylie,

Halite Energy Group Ltd
Underground Natural Gas Storage Facility at Preesall – Environmental Statement
IPC Reference: EN030001

We have reviewed the Environmental Statement Preesall Underground Gas Storage Facility Environmental Statement, prepared by Hyder Consulting UK Ltd. for Halite Energy Group (dated November 2011). We understand that the project will create underground caverns by solution mining for the storage of natural gas with an outfall pipeline for the discharge of saturated brine into the Irish Sea.

Please note that this correspondence is focussed on the outfall component of the proposed project as detailed within Chapter 7 (Archaeology and Built Heritage).

We noted the detail provided in paragraph 7.4.2 regarding the identification of a palaeo-channel feature with the potential for Mesolithic material to survive in-situ and the information in paragraph 7.4.8 regarding the identification, during the marine geophysical survey, of 13 anomalies in proximity to the proposed brine outfall pipeline which could comprise archaeological material relating to maritime activities. The attention given to the possible location of former terrestrial structures that are now submerged (e.g. location of Rossall Grange or Hall) was also noted.

In section 7.8 (Mitigation and Enhancement Measures) we noted the detail provided in paragraph 7.8.5 regarding discussion with English Heritage and the agreed position that geotechnical sample analysis would occur after submission of the Environmental Statement prepared for this project. We have considered the methodology for further archaeological analysis (as set out in paragraphs 7.8.6 to 7.8.25 and we support the statement that archaeological investigations will be conducted according to a Written Scheme of Investigation produced in agreement with
Lancashire County Council (County Archaeologist) for any area as relevant to local authority planning jurisdiction; and that a Written Scheme of Investigation will also be produced, in agreement with English Heritage, for any marine area not within local planning authority control. Please note in paragraph 7.11.3 that reference should be made only to the National Planning Department within English Heritage.

We have also reviewed Environmental Statement Technical Appendix 7.3: Proposed Brine Outfall Pipe, Fleetwood – Marine Archaeological Assessment Final Technical Report, prepared by Wessex Archaeology (Ref: 78290.02, dated September 2011). In consideration of the information provided in this report we support the mitigation recommendations as described in paragraph 7.1.4. We therefore welcome the opportunity to discuss with you the Statement of Common Ground to be prepared for this project as described to us in your email correspondence of 12th January 2012.

In conclusion, we have reviewed the information regarding the possible environmental impact of this proposed project and the proposed mitigation strategies to take account of any potential impact. It is therefore recommended that the delivery of mitigation is addressed within the draft Development Consent Order for this project with attention directed at Schedule 7 (deemed Marine Licence).

Yours sincerely,

Christopher Pater
Marine Planner

Cc Jennie Stopford (English Heritage, Manchester Office)
Anna Geering (MMO, Newcastle)