

Keuper Gas Storage Project Case Team  
The Planning Inspectorate  
3/18 Eagle Wing  
Temple Quay House  
2 The Square  
Bristol  
BS1 6PN

**Our ref:** SO/2016/115762/02-L01  
**Your ref:** EN030002  
**Date:** 28 April 2016

**FAO Jonathan Green**

Dear Sir

**DEVELOPMENT CONSENT ORDER TO CONSTRUCT, OPERATE AND MAINTAIN  
THE KEUPER UNDERGROUND GAS STORAGE FACILITY AND ASSOCIATED  
DEVELOPMENT  
LAND AT AND SURROUNDING THE HOLFORD BRINEFIELD, NORTH OF  
MIDDLEWICH, CHESHIRE**

Thank you for your letter dated 23<sup>rd</sup> March 2016.

In response to the Examining Authority's first round of written questions, we would like to make the following comments:-

**Question 1.1 - Confirm whether you agree with the scope and spatial extent of the geology, land and water quality desk studies, the level of site investigation data supplied and the approach to further ground investigation for the main assessment area and Runcorn Outfall and whether these studies are appropriate to inform the Environmental Impact Assessment (EIA).**

The Geology, Land and Water Quality sections of the ES have assessed the potential risks posed by the development to groundwater and discussed how these risks can be mitigated. The Environment Agency is satisfied that there is no significant risk to groundwater from the proposed development.

**1.41 - Surface water and groundwater quality**

**Flood Risk Assessment (FRA) [APP-176] Figure 3.1 appears to show that to the south of the Gas Processing Plant (GPP) the flood plain is divorced from Puddinglake Brook. Can the Environment Agency and the applicant confirm the accuracy of the mapped flood extent in FRA Figure 3.1 to the south of the GPP, since the flood plain appears to be divorced from Puddinglake Brook in this location. In the event that flood extents are demonstrated to differ from those indicated in the submitted indicative mapping figure, please confirm what measures will be taken to ensure that the scheme footprint avoids the flood plain area and the implications for the sequential and exception tests.**

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The Environment Agency's Flood Maps for Planning show that the floodplain is away from the line of Puddinglake Brook, in the vicinity of the Gas Processing Plant. The Flood Maps are however indicative only and the floodplain area here is shown incorrectly. The correct floodplain area should be shown as extending onto land to the north side of the brook at this location.

In the FRA Figure 3.1, the correct floodplain area will affect part of the Gas Processing Plant site. However, this is unlikely to have any significant effects on the site and would not increase the risk of fluvial flooding elsewhere.

The flood risk associated with Puddinglake Brook is expected to be relatively shallow, affecting low-lying land adjacent to the brook.

**Question 2.18 - Runcorn Outfall**

**Please can the Environment Agency confirm that they are content for the baseline data from the RPS assessment contained in the General ES Annex E [APP-180] to be used in the assessment of ecological effects at the Runcorn Outfall?**

We are content with that the baseline data, from the RPS assessment (contained in the General ES Annex E), to be used in the assessment of ecological effects at the Runcorn outfall. The environmental effects of a brine discharge at this location were addressed at the application stage of the existing discharge consent issued by the Environment Agency (Permit Reference: EPR/DP3424GK).

**Question 10.1 - Please confirm that they are satisfied with the scope of cumulative projects assessed for the main assessment area and Runcorn Outfall and that this includes reasonably foreseeable development with potential to have cumulative impacts during construction, operation, maintenance and decommissioning.**

We are satisfied with the scope of cumulative projects assessed for the main assessment area and the Runcorn Outfall.

The Keuper Gas Storage Project is not expected to have any significant effects on fluvial flood risk or groundwater.

I hope you find these responses to your satisfaction, should you have any further questions or queries please do not hesitate to contact me.

Yours faithfully

**Ms DAWN HEWITT**  
**Planning Advisor**

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