

WRITTEN REPRESENTATIONS - KEUPER GAS STORAGE LTD

We have been instructed to act on behalf of Mr M J Richardson, [REDACTED] in regards to the application by Keuper Gas Storage Ltd for an order granting development consent for the Keuper Gas Storage Project (KGSP).

We would like to make the following comments on behalf of our above client:

- **Background**

Our client runs a successful and profitable dairy farm from their property. They are currently farming 150 acres of owned land and a further 69.32 acres of rented land. They are currently milking 200 cows with 120 young stock.

The Keuper Gas proposal states that the following infrastructure will be placed on our above clients owned property:

- 3 permanent wellheads (H514, H515 and H516) and associated roadways and pipelines.
- Precise levelling points
- Additional rights have also been reserved over the adjoining land to the property for undertaking surveys, drainage works, intrusive ground investigation surveys (boreholes).

In addition to the above the following infrastructure will be placed on our clients rented land:

- 5 permanent wellheads (H503 to H507) and associated roadways and pipelines.
- Precise levelling points.

Our client is concerned about their business and their property during and post construction, as this is not only their home, but also their business and their livelihood in which they make their living.

- **Location of Infrastructure and Loss of Land during Construction**

Due to the proposed location of the above mentioned wellheads and the associated infrastructure such as roadways and pipelines across the property will cause severe disruption to our clients ability to operate their business and continue to farm the land.

13 acres of owned land and a further 16.8 acres of rented land will be taken off our client during construction which will require them to immediately downsize their farming operations turning a currently profitable farm business unviable as costs will not drop along with the income, i.e. economy of scale in reverse.

Our client has considered taking on additional ground, however, currently due to demand for land in the area, nothing suitable come available for them to either purchase or rent to compensate for the potential loss.

- **During Construction**

The total of 8 wellheads will cause severe disruption to our client during construction as it will be difficult to manoeuvre large farm machinery around and into tight and small areas created by the construction areas, and the proposed position of infrastructure. It will also create difficulties in moving livestock around the property, particularly during construction as cattle can get spooked by workers in fluorescent clothing, large number of vehicles and the noise and vibrations caused by the works. This was evident during recent Scottish Power works when it was extremely difficult one evening to get the cattle in for evening milking.

We have suggested several alterations to the proposed scheme to assist in the continuation of our clients farming operations, however, none have been taken, considered or agreed to by Keuper Gas.

- **Post Construction**

Post construction a total of 2.6 acres of owned and 6.35 acres of rented land will be permanently taken off our client, with practically no realistic opportunity to replace it due to lack of land availability in close proximity to the farm. Our client would not be able to re-establish his business or consider potential growth if the GSP was consented.

- **Financial Offers**

Financial offers that have been put forward by Keuper Gas Storage Ltd do not take into account the effect on our clients farming business, which due to the downsizing that would be required and the lack of land availability in close proximity will make our clients business unviable. As stated above it will make it extremely difficult to continue to farm adjoining land to the working areas due to accessing the land with machinery to undertake field work effectively and efficiently and turning out cattle who can easily get spooked by workmen and vehicles. Current financial offers only take into account the value of the land and rights that Keuper Gas Storage Ltd need to acquire to construct and operate the proposal and do not cover their full losses. This must be taken into account.

- **Impact on Residence**

In addition to our clients concerns over the detrimental effect it will have to this business and their livelihood, they are also greatly concerned about the impact it will have on their place of residence, due to noise, vibration and visual impact of the project both during and post construction.

It is also difficult for our client to understand the potential ongoing impact post construction as the DCO documentation regarding maintenance of the proposed infrastructure is unclear.

- **Conclusion**

Our clients are concerned that the perceived benefits of the proposal do not outweigh the loss they that will suffer. Quite simply, due to the staged construction process for brine extraction then for gas storage, the period of construction is likely to be for between 4 and 7 years, our client will be unable to keep milking cows at the farm due to loss of land and the difficulties faced with farming adjoining land making it unavailable.

This obviously results in our client losing their business and livelihood.

Financial offers so far do not even come close to taking this into consideration.