

## Written Representation of Holford Gas Storage Limited

### 1. Summary

- 1.1 This is the written representation of Holford Gas Storage Limited ("**HGSL**") relating to the application by Keuper Gas Storage Limited ("**KGSL**") for a development consent order (the "**Application**") for an underground gas storage facility with up to 19 underground caverns, gas processing plant and associated development with capacity to store up to 500 standard million cubic metres (mcm) of natural gas, having an import and export capability of up to 34 mcm per day (the "**Proposed Development**").
- 1.2 HGSL operates the Holford gas storage facility (referred to as the "**HGSL Project**" in the Application documents). The HGSL Project forms an integral part of the UK's security of energy supply.
- 1.3 The Proposed Development surrounds the HGSL Project. Whilst discussions took place between KGSL and HGSL prior to the submission of the Application, HGSL has not consented to the crossing of its pipelines or the carrying out of works in close proximity to the HGSL Project.
- 1.4 The HGSL Project is regulated as an upper-tier COMAH establishment pursuant to the Control of Major Accident Hazards (COMAH) Regulations 2015. HGSL has a statutory duty to take all measures necessary to prevent major accidents and limit their consequences to people and the environment. HGSL has been reviewing the Application in order to identify the potential negative impacts of the Proposed Development and consider whether any such impacts can be eliminated or mitigated.
- 1.5 HGSL's assessment shows there is clear potential for the construction and operation of the Proposed Development to negatively impact the risk profile of the HGSL Project under the COMAH Regulations. HGSL will need to demonstrate to the Health and Safety Executive (**HSE**) that the revised risks at the HGSL site, as a result of the Proposed Development, are As Low as Is Reasonably Practicable (**ALARP**) and take into consideration any additional risk reduction measures.
- 1.6 However, many of the most effective options for risk elimination or reduction lie within the control of KGSL. For example, by altering the location of parts of the Proposed Development or by KGSL confirming that certain methods of operation will be put in place. Such measures are likely to be impracticable once the layout of the Proposed Development is determined.
- 1.7 KGSL should therefore demonstrate that the inherent features of the design of the Proposed Development will eliminate or mitigate these risks to at least a tolerable level of risk. This has not been done.
- 1.8 Paragraph 4.11.4 of NPS EN-1 requires KGSL to provide sufficient information to enable the HSE to "*assess whether the inherent features of the design are sufficient to prevent, control and mitigate major accidents*". The Secretary of State needs to be satisfied that this assessment has been done before making any DCO for the Proposed Development.
- 1.9 To comply with the NPS, KGSL is therefore required to adequately assess the impact of the Proposed Development on the HGSL Project and potential risk reduction measures and pass this information to the HSE. HGSL should also have the opportunity to comment on this information. The HSE should confirm its assessment of the Proposed Development and that it meets the safety objectives set out in paragraph 4.11 of NPS EN-1. As matters stand, however, it appears that none of this has been done. All of this information will be necessary in order for the Examining Authority to properly consider the COMAH impacts of the Proposed Development, as

relevant and important matters that will go to the Secretary of State's assessment of the adverse impacts of the Proposed Development.

1.10 In the event that the Secretary of State is minded to grant a DCO for the Proposed Development, HGSL considers it necessary for the DCO to contain protective provisions for the benefit of HGSL in order to protect the HGSL Project and maintain the integrity of its apparatus.

1.11 HGSL also makes a number of other points on the application documents.

## 2. **Background**

2.1 This is the written representation of Holford Gas Storage Limited ("**HGSL**") relating to the application by Keuper Gas Storage Limited ("**KGSL**") for a development consent order (the "**Application**") for an underground gas storage facility with up to 19 underground caverns, gas processing plant and associated development with capacity to store up to 500 standard million cubic metres (mcm) of natural gas, having an import and export capability of up to 34 mcm per day (the "**Proposed Development**").

2.2 This written representation is supplemental to HGSL's relevant representation dated 10 February 2016. HGSL has taken into consideration KGSL's comments on HGSL's relevant representation (as set out in a letter dated 23 February 2016).

2.3 HGSL, a wholly owned subsidiary of Uniper Energy Storage Limited, operates the Holford gas storage facility (referred to as the "**HGSL Project**" in the Application documents). The HGSL Project commenced operation in 2011 and became fully operational in 2013. The HGSL Project stores a maximum of 261,600 Tonnes of natural gas. It is anticipated that the HGSL Project will be in operation for 25 years.

2.4 The HGSL Project forms an integral part of the UK's security of energy supply. The HGSL Project provides a source of gas supply flexibility to the National Transmission System (**NTS**) so that the UK's gas supply can be balanced and its security managed. The HGSL Project accepts gas from the NTS (operated by National Grid Gas plc) and stores it in specifically designed and created salt caverns. When required, the gas is withdrawn from the salt caverns, conditioned at the Gas Processing Plant ("**GPP**") and exported to the NTS.

2.5 The HGSL Project consists of eight underground salt caverns; all of these caverns are located within the Order limits. Each cavern has a nominal natural gas storage capacity of approximately 32,000 Tonnes at its maximum operating pressure. The location of each cavern is shown on plan annexed to this written representation.

2.6 Each of the salt caverns is connected to the surface by a series of concentric pipes called casings and strings. These strings are connected to above ground pipework through a wellhead assembly. Each wellhead site is 50m<sup>2</sup> in area and surrounded by security fencing. The above ground pipework for six of the salt caverns is connected via 300mm flowlines to a gas marshalling area (**GMA**). From the GMA, a 2.4km 750mm underground gas pipeline transports gas to the GPP. The flowlines for the two most eastern salt caverns (H401 and H402) connect directly to this gas pipeline. A decommissioned 300mm flowline, used during the construction of the salt caverns, also runs from the GMA to GPP. The GPP is located at the former RAF Cranage Airfield, to the east of the B5081. The GMA, flowlines, gas pipeline and GPP are located within, or in close proximity to, the Order limits. From the GPP, natural gas is transported via a 4.2km 750mm underground pipeline to the NTS compound to the east of the A530. The NTS compound is located within the Order limits. The location of the GMA, gas pipelines, GPP and NTS compound is shown on the plan annexed to this written representation.

2.7 HGSL's employees are based at the GPP. During office hours there are sixteen full time employees and up to twelve contractors and visitors. Daily inspections are carried

out at each wellhead site and the pipelines are routinely inspected. Maintenance works are also undertaken on a daily basis. It is essential that HGSL has 24/7 unobstructed access to each of the wellhead sites, GMA and pipelines in order to carry out these inspections and to deal with emergencies. Access to the wellhead sites and GMA from the GPP is via Drakelow Lane and the existing private access roads (as shown on the Street Works and Access Plan (Examination Library Document Reference APP-033)).

### 3. The Proposed Development and its interaction with the HGSL Project

3.1 The Proposed Development surrounds HGSL's wellheads, GMA, flowlines and pipelines. In particular, the following operational areas would be in close proximity to each other:

3.1.1 The proposed location of KGSL's gas processing plant (Work No. 14) is in close proximity to HGSL's wellhead H408 and the NTS compound.

3.1.2 The proposed location of KGSL's gas marshalling compound (Work No. 20) is in close proximity to HGSL's wellheads H405, H406 and H407 and GMA.

3.1.3 At various proposed locations, KGSL's gas pipelines will run in proximity to and, in some cases, cross HGSL's gas pipelines.

3.2 Access to the Proposed Development will be via the use of the existing private access roads used by HGSL to access its wellheads.

3.3 Whilst discussions took place between KGSL and HGSL prior to the submission of the Application, HGSL has not consented to the crossing of its pipelines or the carrying out of works in close proximity to the HGSL Project. It is acknowledged that the leases between INOVYN Enterprises Limited and HGSL include reserved rights for the construction and laying of apparatus or services or roads. However, the leases enable HGSL to withhold approval of any works in proximity to the HGSL Project on reasonable grounds and the construction of apparatus or services that may interfere with the operation and use of the HGSL Project is not permitted.

3.4 In its relevant representation, HGSL raised concerns relating to the assessment of the HGSL Project within KGSL's Environmental Statement (Examination Library Reference APP-179). HGSL maintains these concerns as the HGSL Project is not referred to when describing the environmental baseline and there still does not seem to be any justification of the failure to assess the use of the existing saturator cavities.

### 4. COMAH Regulations

4.1 The HGSL Project is regulated as an upper-tier COMAH establishment pursuant to the Control of Major Accident Hazards (COMAH) Regulations 2015. HGSL has a statutory duty to take all measures necessary to prevent major accidents and limit their consequences to people and the environment.

4.2 In order to demonstrate to the Health and Safety Executive (**HSE**) that the HGSL Project and its operation meet this duty, HGSL has assessed the risk posed by each Major Accident Hazard (**MAH**), compared them with standard tolerability criteria and demonstrated that they are As Low as Is Reasonably Practicable (**ALARP**). This information has been documented in the HGSL Project COMAH safety report which has been provided to the HSE.

4.3 The MAHs considered in the HGSL Project COMAH safety report relate to ignited natural gas releases, including:

4.3.1 **Jet Fires:** Jet fires occur where there is a loss of containment of a pressurised flammable gas with immediate ignition.

- 4.3.2 **Flash Fires:** Flash fires occur where there is delayed ignition of flammable gas. A gas cloud is formed and, in the event that it encounters an ignition source, a flame will propagate from the ignition point to the release point.
- 4.3.3 **Vapour Cloud Explosions (VCEs):** VCEs occur where the flame in a gas cloud can accelerate and attain a significantly higher speed than that associated with a Flash Fire, generating an overpressure wave. In order for this to occur, some form of confinement is necessary, for example, a gas cloud in a congested plant area.
- 4.4 All reasonable care has been taken in the design, construction and operation of the HGSL Project to minimise the likelihood and severity of potential MAHs. However, as with any industrial process, it is impracticable to entirely eliminate all risks. The HGSL Project COMAH safety report includes detailed analysis to assess the likelihood and severity of residual risks. Consequence modelling tools were used to conservatively predict the potential extent of the area within which each MAH could cause harm (the "harm zone"). An assessment was then made as to the tolerability of the resultant risk.
- 4.5 HGSL is responsible for updating the HGSL Project COMAH safety report following any significant change, or at least on a five-yearly basis. The Proposed Development (as currently designed) it is likely to impact the risk profile of the HGSL Project and therefore prompt an update of the HGSL Project COMAH safety report. In preparation for this potential update, HGSL has been reviewing the Application in order to identify the potential negative impacts of the Proposed Development and consider whether any such impacts can be eliminated or mitigated. In particular, HGSL has considered the proposed layout of the Proposed Development in respect of the harm zones stated in the HGSL Project COMAH safety report.
- 4.6 HGSL will need to demonstrate to the HSE that the revised risks at the HGSL site remain ALARP and take into consideration any additional risk reduction measures. However, as set out below, many of the most effective options for risk elimination or reduction lie within the control of KGSL. For example, by altering the location of parts of the Proposed Development or by KGSL confirming that certain methods of operation will be put in place.
- 4.7 It is acknowledged that KGSL is only required to discharge its duties under the COMAH Regulations in advance of the Proposed Development commencing construction and coming into operation. However matters relating to health and safety and the impact of the Proposed Development on neighbouring facilities must be considered now as part of the DCO process as matters that are both important and relevant and will go to the Secretary of State's assessment of the adverse impacts of the Proposed Development.<sup>1</sup>
- 4.8 Whilst KGSL has indicated that it will consult with HGSL in respect of its COMAH safety report following the grant of a DCO, there is no current identification of potential risks, nor is there any binding commitment to eliminate or suitably mitigate those risks and impacts to at least a tolerable level of risk.
- 4.9 Paragraph 4.11.4 of NPS EN-1 requires KGSL to provide sufficient information to enable the HSE to "*assess whether the inherent features of the design are sufficient to prevent, control and mitigate major accidents*". The Secretary of State needs to be satisfied that this assessment has been done before making any DCO for the Proposed Development. As matters stand, it is not clear whether KGSL has provided sufficient information on the impact of the Proposed Development on the HGSL Project to enable the HSE to properly undertake this assessment. HGSL's assessment of the impact on its project is set out in the following sections.

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<sup>1</sup> Planning Act 2008 s.104(2)(d) and s.104(7)

## 5. Construction impacts of the Proposed Development on the HGSL Project

- 5.1 During the ten year construction programme for the Proposed Development, the Proposed Development, as currently designed, will negatively impact upon the risk profile of the HGSL Project under the COMAH Regulations, as follows.

### Factors that could potentially affect the severity of MAHs

- 5.2 The presence of up to 300 KGSL construction workers will significantly increase the number of individuals present within the predicted harm zones of the HGSL Project. As a result, a MAH at the HGSL Project could result in greater levels of harm than in the absence of the Proposed Development without appropriate elimination or mitigation of risk. For example, personnel operating and maintaining equipment at KGSL's proposed solution mining compound (Work No. 4) would be located within the harm zone of HGSL Wellhead H406 for the duration of the solution mining activities.
- 5.3 As HGSL will not be able to control the number of KGSL personnel within the harm zone, HGSL is concerned that it may not be able to fulfil its duty to eliminate or mitigate these risks to a tolerable level of risk.
- 5.4 As there is still the opportunity for KGSL to make changes to the location and design of the Proposed Development, KGSL ought to commit to eliminate or mitigate these risks to at least a tolerable level of risk. The risks could potentially be eliminated by establishing a strict exclusion zone around the HGSL Project to ensure that KGSL's construction personnel are not present within the harm zones. This may necessitate the relocation of some elements of the Proposed Development; for example, moving the proposed solution mining compound and gas marshalling compound to outside of the harm zones.
- 5.5 In the event that it is not practicable to eliminate the risks to construction workers, there are a number of measures that could be undertaken by KGSL to potentially reduce these risks including:
- 5.5.1 reducing the proposed time of construction for each phase of the Proposed Development and reducing the overall construction programme for the Proposed Development (currently 10 years);
  - 5.5.2 establishing and strictly enforcing procedures to limit, as far as is reasonably practicable, the presence (in terms of both numbers and duration) of construction personnel within the harm zones of the HGSL Project;
  - 5.5.3 establishing joint emergency plans in co-operation with HGSL during the construction phase. In particular, a robust emergency mustering system so that the number and location of all personnel can be accounted for in an emergency; and
  - 5.5.4 ensuring there are evacuation procedures and pathways which direct personnel away from the HGSL Project area.
- 5.6 KGSL has not demonstrated that the location and design of the Proposed Development will ensure that the severity of MAHs from the HGSL Project will be ALARP during the construction of the Proposed Development without causing unacceptable impacts on HGSL.

### Factors that could potentially affect the likelihood of MAHs

- 5.7 The presence of construction activities in proximity to the HGSL Project could increase the likelihood of MAHs. For example, the likelihood of loss of gas containment at HGSL's equipment and pipelines due to impact could be increased by KGSL undertaking lifting and excavation operations nearby. This impact is particularly

prominent in the locations where the proposed KGSL pipelines will be installed in close proximity to HGSL pipelines.

- 5.8 As it is possible for KGSL to alter the proposed location or method of the construction activities for the Proposed Development, KGSL ought to commit to eliminate or mitigate these risks to at least a tolerable level of risk. The risks could potentially be eliminated by altering the layout of the Proposed Development to ensure that such activities do not occur in proximity to the HGSL Project.
- 5.9 In the event that it is not practicable to eliminate the risks of construction activities, there are a number of measures that could be undertaken by KGSL to potentially reduce these risks including:
  - 5.9.1 developing and implementing safe construction plans to be approved by HGSL and ensuring that HGSL has the opportunity to oversee works and the ability to suspend unsafe work and practices in proximity to its assets; and
  - 5.9.2 establishing and enforcing procedures to limit as far as is reasonably practicable, the presence of construction activities in proximity to the HGSL Project.
- 5.10 KGSL has not demonstrated that the location and design of the Proposed Development will ensure that the likelihood of MAHs at the HGSL Project will be ALARP during the construction of the Proposed Development without causing unacceptable impacts on HGSL.

## 6. **Operational impacts of the Proposed Development on HGSL Project**

- 6.1 The proposed operation of the Proposed Development has the potential to negatively impact upon the risk profile of the HGSL Project under the COMAH Regulations, as follows.

### **Factors that could potentially affect the severity of MAHs**

- 6.2 The presence of KGSL operations and maintenance personnel will increase the number of individuals present within the potential harm zones of the HGSL Project. For example, the approximately 30 people working in the proposed KGSL gas processing plant (Work No. 14) or occupying its buildings could be located within the harm zone of HGSL Wellhead H408 or the HGSL NTS compound.
- 6.3 Where the two facilities come into particularly close proximity, there could be potential for a "domino impact". A domino impact occurs where a MAH at one facility causes a MAH at another. For example, the proposed KGSL gas marshalling compound (Work No. 20) lies within close proximity to HGSL Wellhead H406. Thermal radiation from a Jet Fire MAH at H406 could be sufficiently high to cause weakening and subsequent failure of structures and processing equipment at the proposed KGSL gas marshalling compound, leading to further releases of flammable material.
- 6.4 As HGSL will not be able to control the number of KGSL personnel within the harm zone, HGSL is concerned that it may not be able to fulfil its duty to eliminate or mitigate these risks to a tolerable level of risk.
- 6.5 As there is still the opportunity for KGSL to make changes to the location and design of the Proposed Development, KGSL ought to commit to eliminate or mitigate these risks to at least a tolerable level of risk. The risks could potentially be eliminated by altering the layout of the Proposed Development to ensure that operational personnel are not located within the relevant harm zones of the HGSL Project. The layout of the Proposed Development could also be altered to ensure that there is no potential for domino impacts between the two installations.

- 6.6 In the event that it is not practicable to eliminate the risks to operational personnel, there are a number of measures that could be undertaken by KGSL to potentially reduce these risks including:
- 6.6.1 installing fire and blast barriers to mitigate the impact of jet fires and VCE MAHs at the HGSL Project on KGSL personnel and equipment (and vice versa);
  - 6.6.2 establishing and strictly enforcing procedures to limit, as far as is reasonably practicable, the presence (in terms of both numbers and duration) of KGSL personnel within the harm zones of the HGSL Project; and
  - 6.6.3 establishing joint emergency plans in co-operation with HGSL. In particular, a robust emergency mustering system so that the number and location of all personnel can be accounted for in an emergency (e.g. those using the private access roads).
- 6.7 KGSL has not demonstrated that the location and design of the Proposed Development will ensure that the severity of MAHs at the HGSL Project will be ALARP during the operation of the Proposed Development without causing unacceptable impacts on HGSL.

**Factors that could potentially affect the likelihood of MAHs**

- 6.8 As referred to in paragraph 6.3 above, HGSL has identified the potential for domino impacts between the two installations. Therefore MAH's at the Proposed Development could potentially increase the likelihood of a MAH at the HGSL Project. The following are examples of such domino impacts:
- 6.8.1 A MAH at the proposed KGSL gas marshalling compound (Work No. 20) could increase the likelihood of a MAH at HGSL Wellhead H406.
  - 6.8.2 Without adequate design and separation distance, a catastrophic failure of a KGSL buried pipeline (e.g. Work No. 19A) could potentially lead to the failure of the adjacent HGSL pipeline. KGSL has not yet provided HGSL with the necessary information to enable HGSL to assess whether the proposed design and separation distance is adequate.
- 6.9 As there is still the opportunity for KGSL to make changes to the location and design of the Proposed Development, KGSL needs to consider whether these risks can be eliminated or mitigated to at least a tolerable level of risk. The risks could potentially be eliminated by altering the layout of the Proposed Development to ensure that the Proposed Development is not located within the relevant harm zones of the HGSL Project. The layout of the Proposed Development could also be altered to ensure that there is no potential for domino impacts between the two installations.
- 6.10 In the event that it is not practicable to eliminate the risks to assets, there are a number of measures that could be undertaken by KGSL to potentially reduce these risks. As mentioned above, fire and blast barriers could be installed to mitigate the impact of jet fires and VCE MAHs at the Proposed Development on the HGSL Project.
- 6.11 KGSL has not demonstrated that the location and design of the Proposed Development will ensure that the likelihood of MAHs at the HGSL Project will be ALARP during the operation of the Proposed Development without causing unacceptable impacts on HGSL.

**7. The draft DCO and protective provisions**

- 7.1 The Sub-surface Safety Assessment Report (Examination Library Reference APP-192) and the Preliminary Study of Gas Cavity Design Capacity Report (Examination

Library Reference APP-193) set out the control measures that will be used to ensure that the Proposed Development does not adversely affect the integrity of the HGSL Project salt caverns. These documents are not currently referred to in Article 35 or Schedule 2 of the draft DCO and there is therefore no obligation on KGSL to comply with these measures.

- 7.2 HGSL understands that KGSL will be revising Article 35 of the draft DCO and the Construction and Environmental Management Plan (CEMP) following the comments made by the Inspector at the first issue specific hearing on the DCO on 16 March 2016. HGSL considers that it is necessary for the DCO to oblige KGSL to comply with the control measures set out in these documents in order to ensure that the HGSL Project is adequately protected.
- 7.3 As mentioned in its relevant representation, HGSL is concerned about the 10 year timeframe referred to in requirement 17 (decommissioning) of the draft DCO. The lack of certainty over when (if ever) the cavities will be filled with gas makes it difficult for HGSL to give consent to works and prepare for any changes that will be required to the HGSL Project as a result of the Proposed Development. For example, industry practices for pipeline crossing techniques change over time and HGSL would not want to give consent now for works that may not take place for 10 years. There will also be more disruption to the HGSL Project if the gas connection works are carried out in stages, possibly years apart. The 10 year timeframe also leads the reader to query the need for the NSIP element of the project
- 7.4 In order to address these concerns, HGSL considers that the period should be reduced to something much shorter, appropriately justified by KGSL. Also the draft DCO should contain a phasing requirement obliging KGSL to submit a written scheme setting out all stages of the authorised development to the relevant planning authority for approval. KGSL should then notify the relevant planning authority when each stage has been completed.<sup>2</sup>
- 7.5 In the event that the Secretary of State is minded to grant a DCO for the Proposed Development, HGSL considers it necessary for the DCO to contain protective provisions for the benefit of HGSL in order to protect the HGSL Project and maintain the integrity of its apparatus.
- 7.6 The powers in the DCO could enable works to be carried out to HGSL's assets and apparatus. For example, the power to carry out protective works to buildings, the power to carry out surveys and the power to take temporary possession of land for maintaining the authorised development apply to any land within the Order limits. This is of significant concern to HGSL. HGSL requires protective provisions to be included within the DCO to ensure that such works are only carried out with HGSL's consent and under HGSL's supervision and that HGSL is fully compensated for all costs associated with such activities.
- 7.7 Discussions are on going between HGSL and KGSL in respect of protective provisions. As at the date of this written statement, HGSL has not received a substantive response from KGSL on the heads of terms proposed by HGSL on 7 April 2016.
- 7.8 HGSL considers that the following matters need to be included in the protective provisions to ensure the HGSL Project is adequately protected:
- 7.8.1 Provisions requiring KGSL to seek approval from HGSL prior to commencing works in close proximity to the HGSL Project (including ground subsidence monitoring and restricting very heavy duty vehicles from driving over HGSL's pipes and cables). HGSL should have the opportunity to oversee works and the ability to suspend unsafe work and practices in proximity to its assets.

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<sup>2</sup> See Requirement 4 of The National Grid (Hinkley Point C Connection Project) Order 2016 as an example.



- 7.8.2 Provisions requiring KGSL to ensure that suitable access is maintained to the HGSL Project at all times.
- 7.8.3 Provisions relating to the consultation and approval of health and safety related plans and reports (to the extent that they impact on HGSL's assets and apparatus).
- 7.8.4 Provisions relating to the replacement of any landscaping removed that screens HGSL's well heads and other apparatus.
- 7.8.5 Provisions requiring KGSL to reimburse any expenses incurred by HGSL relating to the Proposed Development.
- 7.8.6 Provisions requiring KGSL to cooperate with HGSL relating to construction programming.
- 7.8.7 An indemnity from KGSL to HGSL for any costs incurred by HGSL as a result of the Proposed Development.

7.9 It is hoped that protective provisions will be agreed with KGSL. In the event that agreement cannot be reached, HGSL will submit draft protective provisions to the Examining Authority so that the Secretary of State can decide whether to include them within the DCO.

## 8. **Conclusion**

- 8.1 HGSL's assessment shows there is clear potential for the construction and operation of the Proposed Development to negatively impact the risk profile of the HGSL Project under the COMAH Regulations. HGSL will need to demonstrate to the HSE that the revised risks at the HGSL site, as a result of the Proposed Development, are ALARP
- 8.2 As set out above, the measures that could most effectively eliminate or reduce the risks are generally in the control of KGSL and are likely to be impracticable once the layout of the Proposed Development is determined.
- 8.3 KGSL should demonstrate that the inherent features of the design of the Proposed Development will eliminate or mitigate these risks to at least a tolerable level of risk.
- 8.4 HGSL requests that KGSL confirms that it has adequately assessed the impact of the Proposed Development on the HGSL Project and the potential risk reduction measures. KGSL should confirm to the Examining Authority that this information has been provided to the HSE. HGSL should also have the opportunity to comment on this information.
- 8.5 HGSL requests that the Examining Authority obtains confirmation from the HSE that it has assessed the Proposed Development and that it meets the safety objectives set out in paragraph 4.11 of NPS EN-1.
- 8.6 In the event that the Secretary of State is minded to grant a DCO for the Proposed Development, HGSL considers it necessary for the DCO to contain protective provisions for the benefit of HGSL in order to protect the HGSL Project and maintain the integrity of its apparatus.