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Our ref: 413509  
Your ref: Amendment DCO 2022



Keuper Gas Storage Project (KGSP) Team

**BY EMAIL ONLY**

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Dear KGSP Team

**Amendment - Application by Keuper Gas Storage Limited for an Order Granting Development Consent for the Keuper Gas Storage Project**

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England recently noted the online pre-application consultation on the INOVYN website regarding the amendment to the existing DCO for the Keuper Gas Storage Project (KGSP).

Due to our previous engagement with the [original DCO](#)<sup>1</sup> for the KGSP and our current involvement as a statutory consultee for developments forming part of the HyNet North West Project, we have reviewed the draft amendment documents and provide the below advice.

**In summary Natural England considers that the proposed amendment will not have significant adverse impacts and has no objection.**

We note the current amendment proposals relate to the flexibility of including hydrogen with natural gas, including potential connections in the future to the national system and future hydrogen networks, relocations of an already planned office building and alternate location of an existing planned gas connection compound, with the existing brine pipeline (Lostock Brine Purification Plant Northwich to Runcorn) not expecting to transport the gas.

We are satisfied that the changes are non-material and as such no new air quality, noise, vibration, ecology or ground condition impacts will arise and there will be no significant additional greenhouse gas emissions. Therefore, we are satisfied that our previous advice regarding the KGSP will still apply to this amendment proposal.

**Designated Sites**

Natural England considers that the proposed development will not have significant adverse impacts on Internationally and Nationally designated sites and has no objection. We would expect appropriate Best Available Techniques (BAT) implemented to prevent pollution incidences and understand a surface and ground water management plan is included within the Construction Environmental Management Plan (CEMP).

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<sup>1</sup> <https://infrastructure.planninginspectorate.gov.uk/projects/north-west/keuper-gas-storage-project/>

## **Protected Species**

Natural England previously provided a Letter of No Impediment (LONI) for great crested newt and badger in 2016, with no known bat roosts at that time. Our previous advice regarding the requirement for pre-construction surveys to inform the need for a licence for these species still applies.

Natural England welcomes wording within the DCO to specifically reference European Protected Species. A separate European Protected Species requirement would ensure that activities that may require a protected species license do not take place until Natural England has been consulted and a scheme of protection and mitigation measures has been submitted to and approved by Natural England.

## **Best and most versatile agricultural land and soils**

We are satisfied the CEMP will outline a soil management plan, sediment control plan and site waste management plan.

Guidance on soil protection is available in the Defra *Construction Code of Practice for the Sustainable Use of Soils on Construction Sites*, and we recommend its use in the design and construction of development, including any planning conditions. Should the development proceed, we advise that the developer uses an appropriately experienced soil specialist to advise on, and supervise soil handling, including identifying when soils are dry enough to be handled and how to make the best use of soils on site.

However, should the proposal require future amendment to develop further pipelines or expansion (including further storage facilities) in addition to those specified, Natural England would require further consultation.

We wish to highlight that this response should not be interpreted as a statement from Natural England that there are no other impacts on the natural environment. Other bodies and individuals may make comments that will help inform the environmental value of this site.

Thank you for allowing the time for us to review and provide comments on this draft DCO amendment and we welcome further engagement as the application procedure progresses.

For any further consultations, please contact: [consultations@naturalengland.org.uk](mailto:consultations@naturalengland.org.uk).

Yours faithfully

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Wetlands and Water - Cheshire to Lancashire