



Keuper Gas Storage Project

Consultation Summary

January 2023 – Updated 11th April
2023

Keuper Underground Gas Storage Facility Order 2017, made 15th March 2017

*Application for a Non-Material Change in relation to the nature of gas stored
and layout of the site.*

1. Introduction

- 1.1. Keuper Gas Storage Limited (KGSL) (The Applicant) has submitted an application in accordance with the Planning Act 2008 (“2008 Act”) and the Infrastructure Planning (Changes to, and Revocation of, Development Consent Orders) Regulations 2011 (“2011 Regulations”) to make non-material changes to the Keuper Underground Gas Storage Facility Order 2017 (“2017 Order”).
- 1.2. The Keuper Gas Storage Project (KGSP) involves using specially designed underground salt cavities – created through solution mining – to store gas. The project was granted a Development Consent Order (DCO) in 2017.
- 1.3. KGSL is seeking consent from the Secretary of State for Business, Energy and Industrial Strategy to change the nature of gas stored to include the option of hydrogen gas storage and to the location of one building and one compound; necessitating minor updates to the Landscape Plans, Works Plans and Elevation Plans. The location, amount, size and construction method of the 19 cavities is not planned to change.
- 1.4. The changes proposed to the Plans include:
 - Amendment of the definition of ‘gas’ to include ‘hydrogen’
 - Amendment to reference of ‘National Grid’s National Transmission System’, to give greater flexibility to connect to both the national system and any future hydrogen network
 - Relocation of the planned office building
 - An option to include an alternative location of the planned gas connection compound
- 1.5. This document outlines the consultation undertaken by the Applicant, alongside a summary of how it has responded to comments raised by consultees. This includes voluntary and non-statutory pre-application consultation, in addition to that required by the 2011 Regulations.
- 1.6. This document was first published on 30th January 2023. Since that date additional consultee responses sent direct to the Planning Inspectorate were published on line. This report has been updated to include those responses, to give a complete picture. All responses received by the Planning Inspectorate up until and including the 7th April 2023 are now referenced. The Applicant can confirm that it has received no further direct correspondence via any of the described channels, on consultation matters between 30th January and 7th April 2023 (inclusive).
- 1.7. Updates to this report covering the period between 30th January and 7th April are shown in blue.

2. Pre-application Consultation Approach

- 2.1. The Applicant has already started construction of the consented KGSP, with work to deliver upgrades to the road network commencing in 2022. In 2021 a Local Liaison Group (LLG) was established to provide a forum for two-way dialogue between the project team and the local community during the construction period. A requirement of the original consent, the group meets on a quarterly basis and is made up of locally elected and community representatives.
- 2.2. Extensive engagement and pre-application consultation was carried out as part of the original DCO application. While the proposed DCO non-material amendment did not require pre-application statutory consultation, the Applicant is committed to being a responsible operator and neighbour and undertaking meaningful engagement with local residents and stakeholders throughout the planning and delivery of the KGSP.
- 2.3. All local planning authorities are required by law to adopt a Statement of Community Involvement (SCI) setting out how consultation takes place on planning issues. Most SCIs also provide guidance to developers on how they should undertake pre-application consultation within the local community. The Applicant used the adopted SCI's by the most relevant local authorities - Cheshire West and Chester Council and Cheshire East Council – to ensure the pre-application approach followed best practice proportionate to the proposed change.

Consultation Methods Summary

- 2.4. The period of non-statutory pre-application consultation ran from 21 October 2022 until 13 November 2022. The Applicant delivered a multi-channel approach to maximise the accessibility of the consultation and encourage engagement from as wide a group as possible. In deciding the scope of the consultation, it made sure it was proportionate to the nature of the application – with relatively minor physical changes proposed and very limited changes in environmental impact – and consider the scope of the consultation zones for the original DCO application. Methods included:
- 2.5. **Newsletter**
- 2.6. A consultation newsletter was issued to homes and businesses within the area surrounding the main gas storage site. The newsletter included a description of the proposed DCO amendment and information on the site's suitability for hydrogen storage. It included maps and graphics demonstrating the hydrogen storage processes, as well as outlining the progress so far on the site. A tear-off feedback form was also included, which could be returned to the project team via Freepost. The newsletter can be viewed in Appendix 1.
- 2.7. Reflecting the approach from the previous DCO application, the newsletter was distributed to a 2.5km radius surrounding the main gas storage site.

2.8. **Project website**

A project website was already established to support the original DCO. In support of the pre-application consultation, the website was updated with key information on the proposed DCO amendment application – including details of the proposed changes; links to the draft application documents; details of the consultation including in-person and online events; a link to a proposal summary document; Frequently Asked Questions; and an online questionnaire. Screenshots of the website can be viewed in the Appendix 2.

2.9. **Information Day**

2.10. The Applicant held an in-person Information Day for local residents and stakeholders to find out more information about the proposals, engage with the project team and ask any questions. The event was held at Byley Village Hall, Moss Lane, Byley, Cheshire, CW10 9NG, on Thursday 3 November 2022, from 3-7pm.

2.11. Information boards were displayed at the event, alongside maps, project documents and the option to complete and return the feedback form. Members of the project team were in attendance to talk attendees through the proposed non-material changes and answer questions face-to-face. Images from the event and information boards can be found in the Appendix 3. The event was attended by 16 people.

2.12. **Online webinar and Q&A**

2.13. The applicant held an online webinar and Q&A. This was advertised in the newsletter and took place on Wednesday 2 November 2022, from 6:30pm – 7:30pm. Attendees were able to submit their questions in advance or during the event via the chat function.

2.14. **Newspaper advert**

2.15. Coinciding with the pre-application consultation launch, an advert was placed in locally-circulating media titles to raise awareness of the consultation and encourage participation. The advert was placed in the Northwich Guardian series, incorporating the Northwich, Middlewich and Winsford Guardian titles. A screenshot of the advert can be viewed in the Appendix 4.

2.16. **Community Contact Points**

2.17. Established community contact points were promoted as part of the pre-application consultation. The methods were listed across all communications and consultation materials, including:

- Freephone Information Line: 0800 689 1095
- Email: kgsp@fontcomms.com
- Freepost address: Freepost HAVE YOUR SAY (no stamp required)

2.18. **Project documentation**

2.19. Documents relating to the proposed amendment were published and made available to the public. These included the draft application documents, as well as a Proposal Summary Document – an accessible document summarising the proposed amendments to the consented application, published to aid the consultation process. The Proposal Summary Document can be viewed in the Appendix 5.


2.20. **KGSP Local Liaison Group**

2.21. A Local Liaison Group (LLG) for KGSP was to set up in 2021, providing a forum for two-way dialogue between the project team and the community during the construction period. The LLG meets quarterly and is made of local elected and community representatives. Consultation updates were provided to members of the LLG at a meeting on 1 November 2022, held online via MS Teams.

2.22. Minutes from the November 2022 meeting can be found on the project website and in the Appendix 6.

2.23. One further Local Liaison Group meeting has been held since November 2022, on 31st January 2023. No issues or concerns were raised about the DCO amendment application at this meeting.

2.24. Minutes from the January 2023 meeting can be found on the project website and have been added to the Appendix 6 of this report.

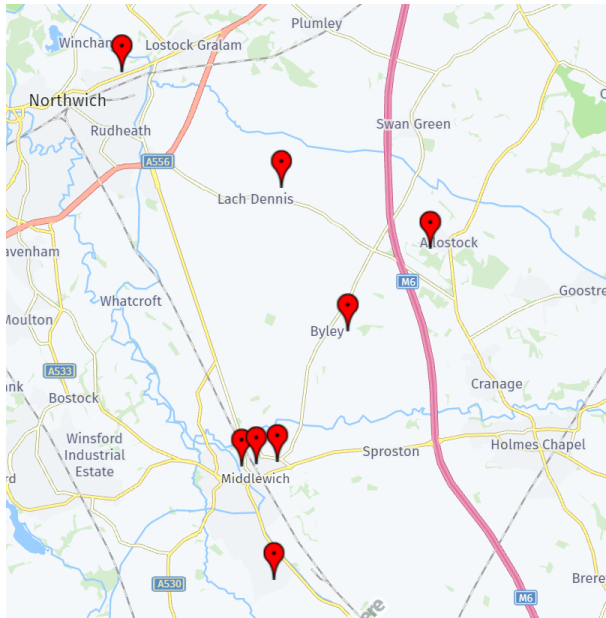


2.25. **Letters to stakeholders**

2.26. The Applicant wrote directly to relevant stakeholders at the launch of the non-statutory pre-application consultation. An example of the letters issued can be found in the Appendix 7.

3. Pre-application Consultation Feedback and Responses

3.1. A total of 15 feedback forms were received over the pre-application consultation period (13 hard copies, 2 online copies). The image below shows (where stated) the locations of those who completed the questionnaire.



3.2. The feedback form provided, asked an open question about respondents’ thoughts on the proposed amendment, and provided space to provide comment and ask questions on the non-material change.

3.3. Respondents largely commented in support of the principle of storing hydrogen, rather than natural gas, at the facility, and highlighted the need for the UK to increase its gas storage capacity.

3.4. A number of respondents asked questions regarding the safety of storing hydrogen underground, with suggestions made for this to be comprehensively assessed as part of the planning process, while other respondents welcomed the provision of more information to help allay any concerns. Additional comments were raised regarding the impact on neighbouring local communities such as Lach Dennis and Middlewich, with a small number of respondents suggesting that compensation for these communities should be considered.

3.5. Respondents appeared to acknowledge the role that the revised proposals could play in supporting the UK’s net zero transition, however, it was also stated that KGSP should form part of an integrated approach that incorporates the rollout of renewable energy infrastructure and green hydrogen generation.

3.6. For ease, the Applicant has provided a table below on the general themes of comments received, alongside sample comments and the Applicant’s response.

3.7. **Feedback Summary and Applicant Response:**

Theme	Sample comments	Applicant Response
Agreement with the plans	<ul style="list-style-type: none"> “A most excellent plan, salt and hydrogen my dad would have been impressed.” 	The Applicant is encouraged by supportive comments for the proposed amendment for the KGSP to have the option to store hydrogen. Throughout the consultation and

	<ul style="list-style-type: none"> • <i>“I am in favour of the Keuper Project. The UK needs more gas storage capacity. Progressively switching UK consumers to hydrogen mains gas will be a positive step towards achieving UK CO2 emission targets.”</i> • <i>“So if we can now produce ‘green’ hydrogen where is it to be stored? Well, why not? In short, go for it! Hydrogen is the future!”</i> • <i>“Yes would agree to Hydrogen. Cleaner emissions cut down on imported gas expense. Perhaps, connect to existing gas mains. Use existing cavities.”</i> 	<p>in published materials, the Applicant made the case that not only does the UK require more energy storage capacity – to increase domestic energy security – but it also needs to decarbonise in order to reach Net Zero targets.</p> <p>In order to facilitate hydrogen being used as a clean fuel in the UK, storage will be essential to respond quickly to peaks in demand.</p> <p>It is encouraging for respondents to acknowledge and support the environmental benefits of the change to storage of hydrogen from natural gas.</p>
<p>Questions around safety considerations</p>	<ul style="list-style-type: none"> • <i>“I would like to know whether hydrogen is a more or less stable product to store than gas – is it more or less safe?”</i> • <i>“My concerns are about the safety aspect of hydrogen storage and what would happen in the event of leakage – how dangerous would this be living in such close proximity?”</i> • <i>“Safety is a main concern. ARUP’s report for the BEIS indicates move to hydrogen could quadruple annual predicted number of gas explosions.”</i> 	<p>The Applicant sought to provide reassurance on safety and education on hydrogen storage – namely that there is little difference in operation of underground storage of hydrogen as the already-consented natural gas. However, published draft application documents outline the full safety considerations.</p> <p>In summary, like any operation of this type, the Project will require a Hazardous Substances Consent to operate. The hazardous substances consent process ensures that all the necessary measures are taken to prevent major accidents. This was previously undertaken for the storage of natural gas for the KGSP. Following advice on acceptability of hydrogen storage at the site from the Health and Safety Executive, Cheshire West and Chester Council, as the competent authority, has now issued hazardous substances consent for the storage of hydrogen at the KGSP.</p> <p>An assessment has been carried out for the introduction of hydrogen to the project. It finds that the hydrogen storage facility is expected to be very similar to the natural gas storage facility, with some differences due to the change of fluid.</p> <p>While this has some implications for the materials of construction (grade of steel) and equipment choice, it does not change how the underground cavities are constructed or used, or the outward view of any of the above ground infrastructure.</p>

		<p>The overall assessments for the facility indicate that the overall safety risks associated with hydrogen are comparable to natural gas. The plant is designed and will be constructed, operated and maintained to appropriate national and internationally recognised standards and all necessary UK safety legislation.</p> <p>The Applicant explained to consultees that the process of applying for a Hazardous Substances Consent was being undertaken concurrent to the DCO amendment.</p>
<p>Integrated approach to net zero</p>	<ul style="list-style-type: none"> • <i>“I think that this is a necessary step to help reduce emissions. However, this needs to be part of an integrated approach. We need to use SPARE wind and solar during low base loads on the grid to generate green hydrogen. Yes there are inefficiencies in generating and storing hydrogen, BUT if we use spare wind/solar then the losses are irrelevant!”</i> • <i>“Ideally the Keuper electrically powered gas processing operations should take advantage of off-peak electricity demand.”</i> 	<p>The Applicant acknowledges and supports the points made, namely that the UK requires an energy mix as part of its transition to Net Zero emissions.</p> <p>As part of the consultation, the Applicant explained how it is proposed for the KGSP to connect to HyNet North West, the regional network planned to generate and distribute hydrogen across the region.</p> <p>Whilst the Applicant recognises the comments made on the approach to hydrogen production, the application solely relates to the storage of hydrogen at the facility. It is not proposed as part of this application to generate hydrogen on site, with the facility able to accept hydrogen, regardless of its method of production.</p>
<p>Community Benefit</p>	<ul style="list-style-type: none"> • <i>“Middlewich must be compensated for the uphaul Middlewich usually loses out for any award, how about you building the bypass?”</i> 	<p>The Applicant has already begun work to implement the original consent, including updates to the existing and proposed site road network. As part of this, the Applicant established an LLG, providing a two-way forum for dialogue, and an Interim Community Environment Fund to cover the initial construction works. This is open to applications from organisations from Middlewich and will be expanded in the future when the main construction period begins.</p> <p>The proposed non-material changes have no impact on the level of construction traffic, as the project hardware is essentially the same.</p>

3.8. In addition to the comments received, members of the project team also received informal questions during conversations (for example at the Information Day event) or via the communication channels. These are summarised below:

Theme	Sample comments	Applicant Response
Requests for information	<ul style="list-style-type: none"> One response said it was difficult to read the map in the community newsletter due to the colours. Requests for information to be sent via email for sharing with stakeholders (for example parish councils). 	<p>The Applicant provided an alternative version of the map, with alternative colours, via email. This was subsequently used at the event and made available to view on the project website.</p> <p>Where requested, the Applicant sent links to consultation documentation via email for wider circulation and awareness-raising.</p>
Questions about delivery of the consented project to date	<ul style="list-style-type: none"> Stakeholders asked about delivery of the consented project to date, since the DCO was granted. 	<p>In direct conversations, as well as engagement with the LLG, the Applicant explained that work to build the new site roads had already commenced, namely the new entrance from the site road close to the main entrance off King Street; a new junction at Yatehouse Lane/Brownhayes Drive; and a new site entrance on Drakelow Lane.</p> <p>It was explained that this work was going well and involved planting of hedgerow where agreed and installation of Cheshire railings. The LLG will be kept updated throughout delivery of this work.</p>
Introductions to companies interested in supplying to the project	<ul style="list-style-type: none"> The Applicant received contact from individuals introducing their organisation and expressing an interest in being a supplier to the Project 	<p>The Applicant welcomes this early interest in the Project. Whilst there are currently limited live supplier opportunities, due to the stage of the Project, there will be in the future.</p> <p>The Applicant intends to keep a log of such expressions of interest and will notify organisations of opportunities that may arise in the future.</p>
Enquiries not related to the Project	<ul style="list-style-type: none"> The Applicant received contact via the Project channels regarding an issue not related to the Project or the non-material change application (namely, local issues with the operational Holford Brinefield). 	<p>In such instances, the Applicant has sought to look into the issue and connect the enquirer with the designated person best able to respond to operational issues, not connected to the KGSP.</p>

4. Post Submission Consultation

- 4.1. In addition to the voluntary/non-statutory pre-application consultation, the Applicant fulfilled required consultation activity upon submission of the application – namely that required by Regulation 6 and Regulation 7. This included:
- 4.2. **Regulation 6 Activity:** The publishing of a notice for two successive weeks in two local newspapers circulating in the vicinity of the land where the project is situated.
- 4.3. The Applicant ensured that the Planning Inspectorate and the Secretary of State were notified of the intention to submit the application and shared a copy of the public notice ahead of its publication in local titles. The Regulation 6 Notice was drafted to include all elements of information as required by the 2011 Regulations.
- 4.4. The Regulation 6 Notice was published in:
 - Runcorn Weekly News – 24 November 2022
 - Northwich and Winsford Guardian – 24 November 2022
 - Runcorn Weekly News – 1 December 2022
 - Northwich and Winsford Guardian – 1 December 2022
- 4.5. Copies of the public notice and the corresponding front cover of the newspaper the notices appeared in can be found in the KGSP Non Material Change Application Reg 7A Statement, submitted to the Planning Inspectorate in December 2022.
- 4.6. **Regulation 7 Activity:** Regulation 7 of the 2011 Regulations requires the Applicant to consult specified persons for non-material change applications – specifically by sending a copy of the notice publicising the application.
- 4.7. The Applicant complied with this requirement. Upon submission of the application, the Applicant wrote to specified persons and those who may be directly affected by the changes to the proposal. Despite the non-material change having very limited likely changes in effects locally – as outlined in the Environmental Report – the Applicant chose to write directly to all residents and businesses within the consultation zone around the main gas storage site, for robustness and consistency.
- 4.8. A copy of the covering letter issued can be found in Appendix 8, alongside a text version of the public notice, which was appended to the letter and the recipients.
- 4.9. The letter and notice was issued to:
 - Prescribed consultees in accordance with Section 56 of the 2008 Act (details of which are outlined in the Appendices)
 - All those with an interest in the land, as included in the Book of Reference for the Project
 - All residential and business addresses within 3.5km of the main gas storage site, totalling 2113 addresses (a map of this area is included in the Appendices).

5. Post Submission Consultation and Responses

- 5.1. The Regulation 6 notice encouraged consultees to contact/make submissions directly to the Planning Inspectorate on the submitted amendment application. However, contact details of the KGSP project team were also provided in the covering letter, resulting in some direct responses.
- 5.2. The below table outlines the responses received and the Applicant's responses.

Consultee	Comment received	Applicant Response
Middlewich resident	<p>Good Afternoon, My name is <name>. I live in Middlewich Cheshire, hence I've recieved details of the Planning Application for the nature of gas stored at your Underground Gas Storage Facility.</p> <p>I've had a quick read of your Preliminary Safety Assessment and have a number of questions.</p> <p>Recognising the Safety Assessment is In it's preliminary stage, the document relies heavily on "signposting" to support arguments. The document concludes that hydrogen gas can be generically safety stored in underground caverns.</p> <p>My questions relate more to the specific application for the safe storage of hydrogen at your facility, not to the generic storage of hydrogen.</p> <p>As with any industry, risks posed by their operations, requires to be demonstrated to be, As Low As Reasonably Practicable. This applies to the public, workforce and environment, as you will be aware.</p> <p>Having a little knowledge sometimes is a bad thing, but my understanding of hydrogen is that very low concentrations in air (4% volume) becomes hazardous and requires a very small ignition source.</p>	<p>1. It may be helpful to know that hydrogen has been stored in a number of underground salt caverns in the USA, and also in the UK over many years. INEOS Inovyn and predecessor companies have been producing and handling hydrogen in the North West for over 100 years and have expertise in the underground storage in salt caverns, including storage of natural gas and ethylene. Indeed, the geology of this area of Cheshire is well characterised and understood, following the installation and operation of gas storage projects over the past forty years or so.</p> <p>It is correct that in the presence of air or oxygen hydrogen is flammable, and this hazard must be managed appropriately. On a specific point, if the energy density of hydrogen is defined as the amount of energy contained within a given volume which is the important factor for salt cavern storage, rather than energy density for a given mass, then the energy density of hydrogen will actually be lower than that of natural gas so the caverns will contain considerably less total energy.</p> <p>The facility has been designed and will be operated to the highest standards to minimise the likelihood of accidents or loss of containment, and to limit the harmful effects of such an accident throughout the life of the facility. Many design and operational measures have been or will be put in place to achieve this objective. A hierarchy of control is used to ensure personal safety, reduce impact upon the environment and limit asset loss. Appropriate Inherent, Preventative, Detection and Control and Mitigation Safety measures are put in place to manage the risk to a level which is ALARP.</p>

	<p>Storage of hydrogen presents know challenges due to its very searching nature and propensity to leak thought seals and joints.</p> <p>The risks presented from storage of hydrogen, on my understanding, must be greater than that of natural gas. This is due to:</p> <ul style="list-style-type: none"> I the lower flammable limits ii the lower ignition energy required iii the propensity for hydrogen to search out leak pathways iv the higher energy density of hydrogen compared to natural gas. <p>My questions are:</p> <ol style="list-style-type: none"> 1. Could you please provide me with the key hazards and their hazard management strategies for the storage of hydrogen at the Keuper Underground Gas Storage Facility. The question relates to the specific site and not the generic storage of hydrogen. This question relates to all phases of operation ie design, commissioning, operation and decommissioning. 2. A summary of how the safe operation and maintenance of the facility will be regulated and demonstrated. 3. A summary of why the risks posed to the Public, Workforce and environment are ALARP. <p>Many thanks,</p>	<p>Examples of inherent safety include aspects such as selection of the site; the layout within the site - to separate people from hazards and minimise piping distances and connections; minimising hydrogen inventory, process temperatures and pressures; designing plant and equipment for the maximum foreseeable temperatures and pressures; selecting materials suitable for the duty and selecting technologies to eliminate or minimise the use of other hazardous materials. The caverns themselves are carefully designed to be stable throughout their life and feature a number of barriers for the safe containment of hydrogen. Cavern commissioning will include a number of independent checks to ensure gas tightness.</p> <p>Preventative measures may be physical (e.g. pipeline thickness), control & instrumentation (e.g. shut-in valves) or procedural (e.g. Planned Preventative Maintenance). Examples of preventative safety include appropriate design and construction of the vessels and pipework for the type and quantity of product stored; PPM of the pipelines and associated equipment; protection against impact damage; Safe systems of work procedures; and competency assurance for operators.</p> <p>If a hazardous event does occur, it is important to be able to detect it and implement control measures to limit the consequences. Examples of detection and control measures can include automated fire and gas detection; procedures requiring regular operator site walk around; Operator monitoring of process parameters; Control system with executive actions; Emergency shutdown of cavities, pipelines, plant and equipment; automatic shutdown and depressurisation systems; Mechanical isolation; Pressure relief systems and Safety Instrumented Systems (e.g. automatic trips).</p> <p>It may be necessary to supplement the control measures by applying active mitigation to limit its consequence. Mitigation measures can include active fire suppression systems; passive fire protection arrangements; ignition control measures (e.g. hazardous area classification); site emergency response procedures; secondary containment to prevent spreading of leaks/spills; and minimising the number of personnel and vehicles onsite. The ignition control measures (hazardous area classification) assessment takes into account the specific</p>
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		<p>characteristics of hydrogen that you describe in your email.</p> <p>At end of life the gas inventory would be removed, the cavern filled with brine, and the cavern ultimately permanently abandoned (plugged) using techniques and technologies which are proven within the underground gas storage and solution mining industry.</p> <p>2. Many internal processes are followed by the company to ensure that the facility is safe. In England regulation is by the HSE and the Environment Agency as the competent authority. The initial planning assessment includes an assessment by HSE (Health and Safety Executive) of the suitability of the proposed location for the storage of hydrogen. Relevant regulations include the COMAH (Control of Major Accident Hazard) Regulations and the Borehole Safety and Operations Regulations. The company is actively engaged with the competent authority with respect to this project. A COMAH demonstration is made in the form of a safety report, which provided to the competent authority and is updated and resubmitted over the life of the facility. Many specialist interventions are proactively carried out by the competent authority over the life of the facility, to ensure that the measures described in the COMAH safety report are actually being applied at the site.</p> <p>3. The ALARP demonstration is made to the competent authority using the safety report and considers (but is not limited to) the types of safety measures described in the response to question 1. Significant hazards are rigorously identified in specialist studies and are modelled to determine safety and environmental consequence. Frequency analysis is carried out to determine the residual risk to people (workers and the public) and the environment. The acceptability of the risk is assessed against company norms and by the competent authority to prove that the risk to people and environment is indeed ALARP.</p>
NATS Ltd	Dear Sirs, we refer to the consultation notice regarding the Non-material Change to the DCO, received by surface mail and dated 17th November 2022.	The Applicant notes and welcomes the response from the NATS Ltd, which concurs with its own assessment as part of the non-material change application.

	<p>NATS operates no infrastructure within 10km of the proposal site. As such, it anticipates no impact from the proposal and has no comments to make. For future consultations, and correspondence please note our contact details and our preference to receive any material electronically.</p>	
<p>Natural England</p>	<p>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).</p> <p>Due to our previous engagement with the original DCO1 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.</p> <p>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.</p> <p>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.</p>	<p>The Applicant notes and welcomes the response from the Natural England, which concurs with its own assessment as part of the non-material change application.</p> <p>As part of the current phase of construction of the site entrance works, the Applicant surveyed for protected species including Great Crested Newts and submitted that data to Natural England in 2021. Natural England subsequently issued a District Level License for the construction works as proposed. For each subsequent package of construction works the Applicant will continue the necessary survey, reporting and licensing requirements for protected species as required under the original DCO consent, which in all cases remain unchanged by this non-material change application.</p>

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).

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

	<p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p>	
<p>Canal & River Trust</p>	<p>Thank you for your consultation on the non-material change to the Order.</p> <p>The made Keuper Gas Storage Facility Order 2017 contains protective provisions for the Canal & River Trust as set out Schedule 9, Part 3 of the Order. Based on the consultation details the proposed non-material changes would not directly or indirectly impact the Trust owned waterways (Trent & Mersey Canal) located some distance to the west of the site in terms of where the layout changes are proposed (or indeed the works associated with the Weaver Navigation (work No.10)). As such no amendments are proposed within the Order in relation to the Trust's interests.</p>	<p>The Applicant notes and welcomes the response from the Canal & River Trust, which concurs with its own assessment as part of the non-material change application.</p> <p>The requested change regarding the contact address for the Canal & River Trust is noted and will be made in the project records for future consultation or discussion. The Applicant would not object to the change being made in the KGSP DCO Amendment Order, to correct the original DCO, provided this does not delay any decision making process. However, this amendment did not form part of the Applicant's consultation process of the Applicant's proposals, thus we would request that the decision on this matter rests with the Secretary of State.</p>

	<p>We would however advise that within the interpretation of the Order we note that as drafted it reads <i>'Canal & River Trust' means the Canal & River Trust whose address is Navigation Road, Northwich, Cheshire, CW8 1BH.</i></p> <p>The Canal & River Trust no longer holds offices at this Northwich address (nor the location address that the notification letter was sent). Our registered address is Canal & River Trust / Glandwr Cymru, National Waterway Museum, Ellesmere Port, South Pier Road, Ellesmere Port, Cheshire, England, CH65 4FW.</p> <p>For completeness, the Keuper Underground Gas Storage Facility (Amendment) Order 2022 should correct this address within the 'Amendments to Part 1 (PRELIMINARY), Article 2 (Interpretation)' section to ensure no ambiguity or miscommunication in the future.</p> <p>The Trust has no further comments to make on the schedule of non-material changes as set out within the consultation letter and application documents and plans.</p>	
National Grid	<p>I'm contacting you on behalf of National Grid Gas Transmission. I recently received an enquiry regarding the DCO for this project and I was hoping somebody could provide me with some more information regarding the connection to the NTS.</p> <p>Apologies if this has already been discussed with National Grid but this project isn't one that I've been made aware of before. I will be able to pass the contact details onto the relevant person within our gas connections team.</p>	<p>The Applicant has subsequently emailed directly to the enquirer from National Grid and offered direct discussions on the project; changes as a result of the non-material change application; and the offer for future direct liaison channels. Direct discussions have been agreed to start in January 2023.</p> <p>The consented DCO for natural gas storage included a connection to the National Transmission System and extensive protective provisions for the benefit of National Grid, that were agreed with National Grid at that time. A change to hydrogen would mean that a connection to the National Transmission System (for natural gas) is no longer required. But the protective provisions still stand, requiring the Applicant, inter alia, to liaise and agree with National Grid on any works in the vicinity of their infrastructure.</p>

Lloyds Bank	We request that you provide the specific property address and title number details of all properties that are affected by the above project and upon which we hold charge. The information is required to enable us to give appropriate consideration to the matter.	The Applicant sent a response to Lloyds Bank, providing details of the individual and relevant property.
Santander	<p>Unfortunately, we are unable to deal with your enquiry/request as we have been unable to locate the mortgage account number. In order that we can assist you, it is important that you return your latter to us together with the following information:</p> <ul style="list-style-type: none"> - The mortgage account number appears to be incorrect, please verify and confirm - The Customer's full name - The full postal address - A copy of the Official Copy of Register Entries showing the charge in our favour - A copy of the Notice of Deposit/Deed of Assignment 	The Applicant sent a response to Santander, providing details of the individual and relevant property.

5.3. For clarity; the above table lists the consultations received directly by the Applicant although they also now appear on the Planning Inspectorate website. The table below outlines the responses received directly by the Planning Inspectorate, that were not published by 30th January or made available to the Applicant at the time of the first publishing of this report on 30th January 2023. They are now included in this update to complete the picture of all consultation responses.

5.4. In summary; the below table outlines the new responses received or published by the Planning Inspectorate and the Applicant's comments or responses. The Applicant has received no direct consultation responses between 30th January and 7th April 2023 (inclusive).

Consultee	Comment received	Applicant Response
United Utilities	<p>Thank you for allowing United Utilities (UU) the opportunity to comment on the application for a non-material change in relation to the nature of gas stored and layout of the site.</p> <p>We understand planning permission has already been</p>	<p>The Applicant notes and welcomes the response from United Utilities, which concurs with its own assessment as part of the DCO amendment application.</p> <p>The location of the United Utilities assets adjacent to or within the order limits are known and understood by the Applicant.</p>

<p>granted through an existing Development Consent Order (DCO) at this site to store natural gas in newly created cavities and the current scheme seeks to amend the existing DCO to give the option of storing hydrogen rather than natural gas. Key changes to the layout include the relocation of the proposed office building and an option to include an alternative location of the planned gas connection compound.</p> <p>United Utilities has reviewed the documents and whilst we have assets within and adjacent to the order limits we do not wish to raise any specific comments in relation to the proposed amendments. We are aware the site is located in close proximity to HS2 Ph2b high speed rail project. It is worth noting that at the request of HS2 Ltd, United Utilities has identified a number of water and wastewater network assets to be diverted out of the HS2 Phase 2b trace. Based on current information it is not anticipated the proposed asset diversions works will impact your proposed scheme, however, HS2 Ph2b is still progressing through Parliament and the scope of United Utilities works may change at the request of HS2 Ltd. If there is a future change of scope, affecting your development, you will be notified by HS2 Ltd.</p> <p>OUR ASSETS AND PROPERTY</p> <p>United Utilities will not allow building over or in close proximity to a water main.</p> <p>United Utilities will not allow a new building to be erected over or in close proximity to a public sewer or any other wastewater pipeline. This will only be reviewed in exceptional circumstances.</p> <p>There are water mains within and adjacent to the order limits. We require access as detailed in our 'Standard Conditions for Works Adjacent to Pipelines', a copy of which is enclosed. You should note that our 'Standard Conditions'</p>	<p>The appropriate avoidance measures and consultation and agreement with United Utilities will be made at the appropriate time. The Applicant is familiar with its responsibilities to water and other third party utility assets.</p> <p>The Applicant is familiar with the proposed routing and safeguarding of the route of HS2. The Applicant believes that this is of sufficient distance from the order limits to not be of concern both in terms of the proposed project assets; and any potential diversion of United Utility assets. In addition, the proposed DCO amendments have no impact on the separation distances or proximity of HS2 generally to the project infrastructure, thus are not a consideration for this DCO amendment application. However, the Applicant will continue to liaise with both United Utilities and HS2 Limited at the appropriate time.</p> <p>.</p>
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guidance applies to any design and construction activities in close proximity to water pipelines and apparatus that are no longer in service, as well as pipelines and apparatus that are currently operational.

It is the applicant's responsibility to demonstrate the exact relationship between United Utilities' assets and the proposed development. You should investigate the existence and the precise location of water and wastewater pipelines as soon as possible as this could significantly impact the preferred site layout and/or diversion of the asset(s) may be required. Where United Utilities' assets cross the proposed Order Limits, including construction traffic routes and surface construction activities, we request you contact United Utilities at least 3 months prior to commencing any works on site, including trial holes, groundworks or demolition.

If considering a diversion, you should contact United Utilities at your earliest opportunity as you may find that a diversion is not possible. In some circumstances, usually related to the size and nature of the assets impacted by proposals, you may discover that the cost of a diversion is prohibitive in the context of the development scheme. Unless there is specific provision within the title of the property or an associated easement, any necessary disconnection or diversion of assets to accommodate development, will be at the applicant's/developer's expense. In some circumstances, usually related to the size and nature of the assets impacted by proposals, you may discover the cost of diversion is prohibitive in the context of the development scheme.

Where United Utilities' assets exist, the level of cover to United Utilities pipelines and apparatus must not be compromised either during or

after construction and there should be no additional load bearing capacity on pipelines without prior agreement from United Utilities. This would include earth movement and the transport and position of construction equipment and vehicles.

Our Standard Conditions document includes details of trees and shrubbery suitable for planting in the vicinity of our assets. Deep rooted shrubs and trees should not be planted near to our apparatus. Consideration should also be applied to United Utilities' assets which may be located outside the proposed Order Limits. Any construction activities in the vicinity of our assets must comply with our 'Standard Conditions for Works Adjacent to Pipelines' and national building standards. You must contact United Utilities for advice if your proposal is in the vicinity of water or wastewater pipelines and apparatus. It is your responsibility to ensure that United Utilities' required access is provided within the proposed layout and that our infrastructure is appropriately protected. You would be liable for the cost of any damage to United Utilities' assets resulting from their activity. Please see 'Contacts' section below.

WATER SUPPLY REQUIREMENTS
Further information provided but not detailed here.

GENERAL ADVICE
Further information provided but not detailed here.

CONTACTS
Further information provided but not detailed here.

If you wish to discuss the detail of this letter further, please do not hesitate to contact me at

<email>

Yours faithfully

<name>

Town Planner
Planning, Landscape and Ecology
Team

	United Utilities Water Limited	
The Coal Authority	<p>Dear Planning Inspectorate</p> <p>Further to the notification received from Keuper Gas Storage Limited, dated 17 November 2022 regarding the Non Material Changes to the nature of gas stored and layout for the site, I can confirm that as the overall development site lies outside the coalfield area, the Coal Authority's planning team have no specific comments to make on this consultation.</p> <p>Kind regards <name> Planning & Development Manager.</p>	The Applicant notes the response.
Shropshire Council	<p>Dear Sirs</p> <p>Application for a Non-Material Change in relation to the nature of gas stored and layout of the site</p> <p>The local authority have no comments to make regarding this matter.</p> <p><name> Technical Support Officer Development Management Team Shropshire Council SHREWSBURY SY1 9LJ</p>	The Applicant notes the response.
Natural England (Second response dated 6 th Jan 2023)	<p>Dear Sir/Madam</p> <p>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.</p> <p>In summary Natural England considers that the proposed changes will not have significant adverse impacts in relation to our remit and so have no additional comments to make.</p> <p>We note this Non-Material Change application relates to amendment of the definition of 'gas' to include</p>	The Applicant notes and welcomes the response from Natural England, which concurs with its own assessment as part of the DCO amendment application.

	<p>'hydrogen', amendment to reference of 'National grid's National Transmission System', the relocation of a planned office building and the option to include an alternative location of the planned gas connection compound. We have reviewed the Environmental Report by ERM dated 08 August 2022 are satisfied with the updated information provided. We are satisfied that the changes are non-material and as such no new air quality, noise and 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 Keuper Gas Storage Project will still apply to this application.</p> <p>Yours faithfully <name> Planning & Development Lead Adviser Cheshire to Lancashire Area Team</p>	
<p>National Grid (second response dated 9th January 2023)</p>	<p>National Grid Gas – High Risk Response Letter Dear Sir/ Madam, An assessment has been carried out with respect to National Grid Gas Transmission plc's apparatus and the proposed work location. Based on the location entered into the system for assessment the area has been found to be within the High Risk zone from National Grid Gas Transmission plc's apparatus and you MUST NOT PROCEED without further assessment from Asset Protection. Before you go ahead with these works, you are required to send your plans and a description for to us to review them at <>. We will contact you within 28 days of receipt It is YOUR responsibility to take into account whether you are required to or would benefit from referring to the HSE Land Use</p>	<p>This is a standard response to inquiries to National Grid. Clearly the project includes proposals for works in the vicinity of National Grid assets as the proposal includes a connection to National Grid assets. The proposed change to hydrogen would actually see these works move further away from National Grid assets. The extant DCO includes Protective Provisions for the protection of National Grid assets in Schedule 9. None of these are changed or affected by the proposed DCO amendment application.</p> <p>The Applicant will continue to work with National Grid to ensure safeguarding and protection of their assets during any construction works.</p> <p>As previous said, in the table above this table, in the first publication of this report, the Applicant has contacted National Grid for direct discussions on project matters.</p> <p>A meeting was held on 6th February 2023 with representatives of National Grid including the named individual from the response dated 13th</p>

	<p>Planning App (LUP), available from HSE’s website. (Please note for some works this is a requirement for them to take place) More information on the LUP is available at <></p> <p>Please note this response and any attached map(s) are valid for 28 days.</p> <p>Yours sincerely Asset Protection Team</p> <p><i>Further details about works requirements, consultation and enquiries given.</i></p>	<p>January 2023. There are no formal minutes of that meeting.</p> <p>At that meeting the project and proposed changes were discussed at length and the likely interactions that may occur in the future.</p> <p>Both parties agreed to future ongoing dialogue.</p> <p>National Grid raised no immediate concerns about the project or proposed changes at that meeting.</p>
HGSL	<p>Dear Planning Inspectorate</p> <p>Holford Gas Storage Limited (HGSL) is a wholly owned subsidiary of the energy supplier Uniper. HGSL operates and maintains a natural gas storage facility connected to the National Transmission System. It is similar in principle to the proposed KEUPER facility, with existing natural gas storage caverns located adjacent to the red-lined development area. The HGSL caverns are situated in similar geology to the proposed KEUPER caverns. Uniper is highly supportive of the transition to a low carbon energy system.</p> <p>Regarding the proposed KEUPER development, we would like to highlight a small issue regarding Schedule 9, Part 5 (For the Protection of Holford Gas Storage Limited) within the Development Consent Order (DCO). We believe this is a simple typographical drafting error which whilst minor should nevertheless be corrected within the final DCO text to ensure the relevant clauses serve their intended purpose.</p> <p>Specifically, Schedule 9, Part 5, paragraph 62, sub-paragraph 10 reads:</p> <p>“At all times when carrying out any works authorised under the Order the undertaker must comply with the undertaker’s policies for safe working in proximity to apparatus”</p>	<p>The Applicant notes the response from HGSL.</p> <p>The HGSL requested change regarding the typographical error in the protective provisions of Schedule 9 of the DCO is noted and understood; and will be made in the project records for future implementation.</p> <p>Similar to the change requested by CRT, the Applicant would not object to the change being made in the KGSP DCO Amendment Order, to correct the original DCO, provided this does not delay any decision making process.</p> <p>However, this amendment did not form part of the Applicant’s consultation process of the Applicant’s proposals, thus we would request that the decision on this matter rests with the Secretary of State.</p>

	<p>This should be corrected to read: “At all times when carrying out any works authorised under the Order the promoter must comply with the undertaker’s policies for safe working in proximity to apparatus” Thank you for your consideration Yours sincerely, <name> HGSL Operations Manager On behalf of Holford Gas Storage Limited.</p>	
<p>Historic England</p>	<p>Dear Sir/Madam Historic England is an Executive Non-Departmental Public Body sponsored by the Department for Culture, Media and Sport, with our funding agreement also signed by CLG and DEFRA. We are the UK Government’s statutory adviser and a statutory consultee on all aspects of the historic environment and its heritage assets. This includes archaeology on land and underwater, historic buildings, sites and areas, designated landscapes and the historic elements of the wider landscape. The changes proposed to the plans include: <Changes listed> Having considered the documentation submitted in support of the application, and particularly the Keuper Hydrogen Storage Non-material Change Application Environmental Report, dated 8 August 2022, we agree with the conclusions of Section 8 of that report ('Updated Cultural Heritage') that the proposed physical changes to the location of the office building and the gas connection compound do not introduce any new or different impacts on the cultural heritage resource. Similarly, the amendments to the definition of gas and to the transmission system are unlikely to have any new or different impacts. The comments made in our letter of 27 April 2016</p>	<p>The Applicant notes and welcomes the response from Historic England, which concurs with its own assessment as part of the DCO amendment application.</p>

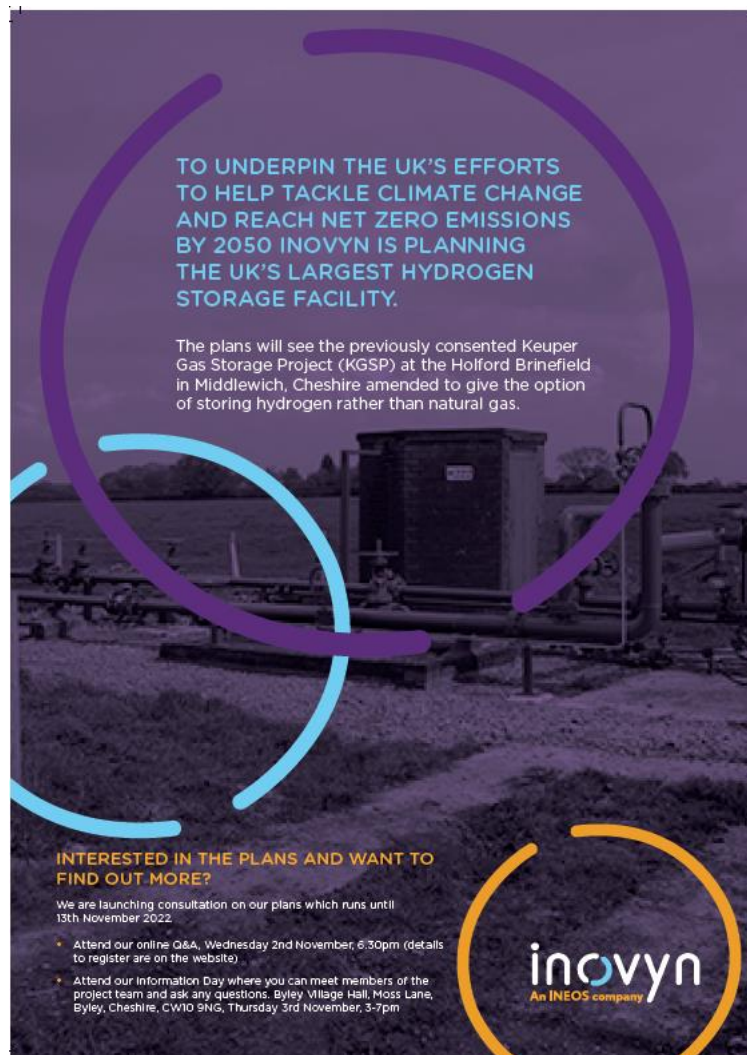
	<p>(ref 10032010/PL00017270) on the initial application therefore remain relevant to the amended scheme. Yours faithfully <name> Inspector of Ancient Monuments</p>	
<p>Environment Agency</p>	<p>Dear Sir/Madam APPLICATION FOR A NON-MATERIAL CHANGE IN RELATION TO THE NATURE OF GAS STORED AND LAYOUT OF THE SITE: HAZARDOUS SUBSTANCES CONSENT FOR THE PRESENCE BY MEANS OF STORAGE, COMPRESSION AND TREATMENT OF HYDROGEN GAS, A HAZARDOUS SUBSTANCE, ON, OVER OR UNDER LAND OFF KING STREET, BYLEY, CHESHIRE LAND OFF KING STREET AT DRAKELOW FARM, LACH DENNIS, NORTHWICH, CW9 7SF Thank you for consulting us on the above application, on 17th November 2022. We have no comments to make in respect of the non-material change. Yours faithfully <name> Planning Advisor</p>	<p>The Applicant notes the response.</p>

6. Conclusion and next steps

- 6.1. This report outlines the extent of consultation activity undertaken by the Applicant in support of an application to make non-material changes to the Keuper Underground Gas Storage Facility Order 2017. It details the approach to not only consultation activity required by the Regulations (following submission), but also the Applicant's approach to non-statutory/voluntary community consultation, carried out ahead of submission of the application.
- 6.2. The Applicant is committed to meaningful engagement, which will be ongoing through delivery of the Project. It has already committed and put in place key measures to engage local stakeholders, including establishing a LLG and interim benefit fund. Over the coming months and years, activity will include:
 - Updates to the project website
 - Maintenance of the communication channels for in-bound enquiries
 - Updates to key stakeholders at key project milestones
 - Quarterly meetings of the LLG
 - Establishing a Community Benefit Fund to accompany the main construction period
- 6.3. The Applicant will engage with key stakeholders following the decision of the Secretary of State on the application for a Non-Material Change.
- 6.4. Since the first publication of this report on 30th January 2023 the Applicant has not received any direct communications from statutory consultees or stakeholders about the proposed DCO amendment application up until and including the 7th April 2023. The Applicant has held a further Local Liaison Group meeting as described in Section 2, where progress of the DCO amendment application was discussed but no issues or concerns about the changes were raised.
- 6.5. The Applicant will continue to hold Local Liaison Group meetings on a regular basis with the local community representatives throughout the construction period to provide a forum for two way dialogue about project matters.

7. Appendices

Appendix 1 – Newsletter



TO UNDERPIN THE UK'S EFFORTS TO HELP TACKLE CLIMATE CHANGE AND REACH NET ZERO EMISSIONS BY 2050 INOVYN IS PLANNING THE UK'S LARGEST HYDROGEN STORAGE FACILITY.

The plans will see the previously consented Keuper Gas Storage Project (KGSP) at the Holford Brinefield in Middlewich, Cheshire amended to give the option of storing hydrogen rather than natural gas.

INTERESTED IN THE PLANS AND WANT TO FIND OUT MORE?

We are launching consultation on our plans which runs until 13th November 2022.

- Attend our online Q&A, Wednesday 2nd November, 6:30pm (details to register are on the website).
- Attend our Information Day where you can meet members of the project team and ask any questions. Byley Village Hall, Moss Lane, Byley, Cheshire, CW10 9NG, Thursday 3rd November, 3-7pm

inovyn
An INEOS company

THE PLANS

The KGSP would involve using specially designed underground salt cavities – created through solution mining – to store gas. Cheshire's geology means it is one of the few places in the UK where gas can be safely stored underground and INOVYN Enterprises has been solution mining the Holford Brinefield to produce brine for over 90 years. The cavities left behind once the brine is mined have been used to safely store gas since the 1980s.

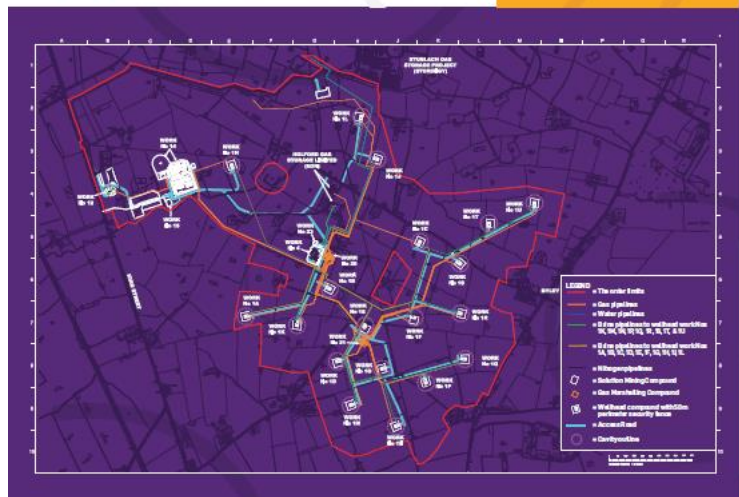
In 2017, we were given planning permission to store natural gas in newly created cavities. Because of the project's importance in helping the UK meet its increasing energy needs, it was classified as a Nationally Significant Infrastructure Project (NSIP). This means that rather than going through the local authority like most planning applications, it required a Development Consent Order (DCO) from the Secretary of State for Business, Energy and Industrial Strategy (BEIS).

We are now looking to amend the existing DCO to give the option of storing hydrogen rather than natural gas. If the change is approved, we will use 19 new underground cavities to store 1,300 gigawatt hours of hydrogen – more clean energy than any other facility and enough to heat more than 100,000 homes for an entire year.

The location of the proposed cavities is the same as those consented through the existing DCO and can be seen on the diagram below.

WHAT IS BRINE USED FOR?

Brine is a concentrated salt solution that is used to make chlorine (which makes our drinking water safe) and everyday essentials such as washing powder, toothpaste and table salt.



WHY IS IT NEEDED?

Hydrogen is a game-changing source of energy that can be used as both a raw material for industry and as a clean power source for transport, industry, business and the home. It has the potential to make a significant impact in the fight against climate change.

The project will underpin Britain's energy security and support the Government's ambitions to ramp up hydrogen use as a clean fuel to enable us to meet legally binding targets to reach net zero carbon emissions by 2050. Storage will be essential to respond quickly to peaks in demand for hydrogen.

The KGSP will connect to HyNet North West - the regional hydrogen and carbon capture project planned to produce, store and transport hydrogen around the North West - helping to decarbonise our industries from the mid-2020s. By 2030, HyNet will reduce carbon dioxide emissions by 10 million tonnes every year, the equivalent of taking 4 million cars off the road.



THE PLANNING PROCESS

The Planning Inspectorate (PINS) is the government agency responsible for examining planning applications for NSIPs.

The original consent states that the cavities will be used to store natural gas. The main change is ensuring that the consent states hydrogen can also be stored in the cavities.

The location, amount, size and construction method of the 19 cavities is not planned to change.

The changes we plan to request are:

1. Amendment of the definition of 'gas' to include hydrogen
2. Amendment to reference of 'National Grid's National Transmission System', to give greater flexibility to connect to both the national system and any future hydrogen network

3. Relocation of the planned office building
4. An option to include an alternative location of the planned gas connection compound
5. The current planned locations and proposed planned locations are shown on the diagrams below.

All other aspects of the project, including the entrance to the site on King Street, the site road network, the layout of gas processing plant and electricity supply infrastructure would remain the same. No changes are proposed at the locations beyond the main Holford Brinefield site at Whitley, Lostock and Runcorn.

The decision maker for the change to the consent is the Secretary of State for Business, Energy and Industrial Strategy. You can view all the planning documents, including the various technical assessments relating to the existing DCO consent on the website: www.kgsp.co.uk.



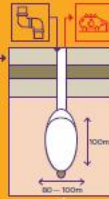
GAS STORAGE

2

Gas is measured and then passed through a Gas Processing Plant before it is injected into the cavity.

1

The cavities left behind by solution mining are used to store gas from the National Transmission System (NTS) at times when gas usage is lower, for example during warmer, summer months.



3

When there is a high demand for gas, for example during colder, winter months, the gas can be withdrawn from storage.

4

The gas passes through a gas treatment facility to remove water and impurities before it is returned to the NTS.

Gas out → Gas in

KGSP: PROGRESS SO FAR

We have already started construction of the KGSP. Work currently being undertaken includes building new site roads.

- New entrance from the site road close to the main entrance off King Street - this is complete
- New junction at Yatehouse Lane/Brownhayes Drive - this is nearly complete with fencing now installed. We are also discussing with Cheshire West & Chester Council about including some new white lines to mark the road from the junction.
- New site entrance at Drakelow Lane

COMMUNITY ENVIRONMENTAL FUND

We have put in place an Interim Community Environmental Fund to cover the initial site entrance construction works and preparation period of the project. The fund will be expanded in the future when the main plant is constructed. The initial fund will be £10,000 with an application period open from 1st April 2022 through to the end of December 2023. For further details visit www.kgsp.co.uk

LOCAL LIAISON GROUP

A Local Liaison Group (LLG) for KGSP was set up in 2021, providing a forum for two-way dialogue between the project team and the community during the construction period. The LLG meets quarterly and is made of local elected and community representatives. For further information on the LLG, including who your local community representative is please visit: www.kgsp.co.uk

THE BENEFITS



Providing a flexible and secure supply of clean energy to underpin the UK's energy security and transition to net zero emissions



Storing enough hydrogen to heat 100,000 homes every year



An investment of more than £600million



Up to 300 construction jobs and 30 operational jobs



Supporting INOVYN® businesses at Runcorn by providing brine, which is essential to ongoing operations



A community benefit fund similar to the funds previously in place for the other existing gas storage projects at the Holford Brinefield, where £30,000 is made available for local community projects each year of main construction

HAVE YOUR SAY

You can have your say on our plans to amend the existing KGSP planning consent to enable us to store hydrogen in the following ways:

- Fill in the questionnaire attached to this newsletter and pop it in the post (it's free!)
- Take a look at our website www.kgsp.co.uk to fill in the questionnaire or ask a question
- Get in touch using the contact details on the bottom of the newsletter

The consultation closes on 13th November 2022 so please send us your comments before then. Following the consultation, we plan to submit an application for the change to the DCO to the Planning Inspectorate before the end of the year.

ABOUT INOVYN

The Keuper Gas Storage Project is being developed by Keuper Gas Storage Limited, a wholly owned subsidiary of INOVYN. Keuper Gas Storage Limited is

the project developer. INOVYN Enterprises Limited is the land owner and its Brine & Water Business would be responsible for the solution mining of brine to facilitate this proposed development. INEOS has strong ties to the region and employs over 1,000 people in Runcorn and Northwich. The Company produces a range of essential chemicals for use by industry in the UK and overseas.

INEOS, through its subsidiary INOVYN, is already Europe's largest existing operator of electrolysis, the critical technology which uses renewable energy to produce hydrogen for power generation, transportation, and industrial use. We are investing more than €2 billion into electrolysis projects to make zero carbon, green hydrogen across Europe.

At our existing site in Runcorn, we've been producing hydrogen gas for more than 100 years. We currently produce more than 10,000 tonnes of hydrogen per year in a 200MW chlor-alkali electrolysis cellroom.

inovyn
An INEOS company

GET IN TOUCH

Call: Freephone 0800 689 1095 (Monday to Friday 9.00am to 5.30pm)

Email: kgsp@fontcomms.com

Write to: Freepost HAVE YOUR SAY

Visit: 



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ABOUT YOU

Name

Address

Email

Phone

Age Under 20 20 - 35 36 - 50 51 - 65 Over 65

This information is optional but will help us to analyse the information you have provided more effectively and enable us to keep you updated on the project in the future.

Would you like to be kept updated about the project? Yes No

If so, please state how: Email Post

Providing your contact details allows Font Communications Ltd, on behalf of Keuper Gas Storage Ltd, to assess the reach of the community consultation and log responses. Should you select to be kept informed, your email address and postal address will allow Font Communications to keep you updated on plans for the Keuper Gas Storage Project only. Copies of the feedback received may be made available, in due course, to the Planning Inspectorate. We will, however, request that your personal details are not placed on the public record. Your personal details will be held securely by Font Communications Ltd and Keuper Gas Storage Ltd in compliance with the UK General Data Protection Regulation (UK GDPR).

Appendix 2 – Website

To underpin the UK's efforts to help tackle climate change and reach net zero emissions by 2050 INOVYN is planning the UK's largest hydrogen storage facility.



Keuper Gas Storage Limited (KGSL), a wholly owned subsidiary of INOVYN, is planning to develop a new underground hydrogen storage facility and associated development at the southern end of the Holford Brinefield and surrounding area, to the north of Middlewich in Cheshire.

The plans will see the previously consented Keuper Gas Storage Project (KGSP) amended to give the option of storing hydrogen rather than natural gas.

KGSP: Progress so far

We have already started construction of the KGSP. Work currently being undertaken includes building new site roads.

- New entrance from the site road close to the main entrance off King Street – this is complete
- New junction at Yatehouse Lane/Brownhayes Drive – this is nearly complete with fencing now installed. We are also discussing with Cheshire West & Chester Council about including some new white lines to mark the road from the junction.
- New site entrance at Drakelow Lane

Hydrogen is a game-changing source of energy that can be used as both a raw material for industry and as a clean power source for transport, industry, business and the home.

The project will underpin Britain's energy security and support the Government's ambitions to ramp up hydrogen use as a clean fuel to enable us to meet legally binding targets to reach net zero carbon emissions by 2050. The Government recently doubled the amount of hydrogen it wants to see produced in the UK by 2030.

In order to facilitate hydrogen being used as a clean fuel in the UK, storage will be essential to respond quickly to peaks in demand. Currently, hydrogen cannot be stored in the national transmission system at the scale that natural gas can.

The North West is seen as a key location for hydrogen production and carbon capture, partly due to its natural assets and partly due to the significant presence of established, energy intensive industries that need to cut their carbon emissions.

It is planned for the KGSP to connect to HyNet North West – the regional hydrogen and carbon capture project planned to produce, store and transport hydrogen around the North West – helping to decarbonise our industries from the mid-2020s. By

2030, HyNet will reduce carbon dioxide emissions by 10 million tonnes every year, the equivalent of taking 4 million cars off the road.

What are the benefits?

There will be several benefits to delivering the project and changing the consent to give the option of storing hydrogen:



Providing a flexible and secure supply of clean energy to underpin the UK's energy security and transition to net zero emissions



Storing enough hydrogen to heat 100,000 homes every year



An investment of more than £600million



Up to 300 construction jobs and 30 operational jobs



Supporting INOVYN's businesses at Runcorn by providing brine, which is essential to ongoing operations



A community benefit fund similar to the funds previously in place for the other existing gas storage projects at the Holford Brinefield, where £30,000 is made available for local community projects each year of main construction

What is planned to change at the KGSP site?

In reality, the changes to the Project are minor in nature. The original consent states that the cavities will be used to store natural gas. The main change is ensuring that the consent states hydrogen can also be stored in the cavities.

The location, amount, size and construction method of the 19 cavities is not planned to change.

The changes we plan to request are:

1. Amendment of the definition of 'gas' to include 'hydrogen'
2. Amendment to reference of 'National Grid's National Transmission System', to give greater flexibility to connect to both the national system and any future hydrogen network
3. Relocation of the planned office building
4. An option to include an alternative location of the planned gas connection compound

Bullets 3 and 4 are the only proposed physical changes to the layout. The current planned locations and proposed planned locations are shown on the diagrams below.

All other aspects of the Project, including the entrance to the site on King Street, the site road network, the layout of gas processing plant and electricity supply infrastructure would remain the same. No changes are proposed at the locations beyond the main Holford Brinefield site at Whitley, Lostock and Runcorn

The Planning Process

Because of the importance of the Project in helping the UK meet its increasing energy need, the KGSP was classified as a Nationally Significant Infrastructure Project (NSIP). As such, rather than going through the local authority, the DCO was granted by the Secretary of State for Business, Energy and Industrial Strategy. This process was managed by the Planning Inspectorate. The KGSP has a webpage on the [Planning Inspectorate website](#).

The change application will be the same. We are working with the Planning Inspectorate and plan to submit the application to them before the end of 2022.

Before we do, we are consulting the local communities, authorities, statutory bodies and other stakeholders on the proposed change.

Have your say

Pre-application consultation is essential in allowing KGSL to understand and respond to any questions or concerns. Extensive engagement and pre-application consultation was undertaken as part of the original DCO application. Full details of how we carried out our consultation is set out in the KGSP Consultation Report, which can be downloaded from the 'Library' page by clicking [here](#).

Before we submit the change application to the Planning Inspectorate, we are consulting again to provide people a chance to speak to the project team and seek views from a broad range of stakeholders and interested communities.

The consultation closes on 13th November 2022.

There are several ways you can find information about the Project and the change application:

- Read the draft application documents [here](#)
- Attend our online Q&A, Wednesday 2nd November, 6.30pm ([register here](#))
- Attend our Information Day where you can meet members of the project team and ask any questions. Byley Village Hall, Moss Lane, Byley, Cheshire, CW10 9NG, Thursday 3rd November, 3-7pm
- Complete the [online feedback form here](#) or request a hard copy by contacting us (see Get in Touch page)
- Get in touch via email, phone or post ([see contact page](#))

Why are you planning to store hydrogen rather than natural gas?

Hydrogen is a game-changing source of energy that can be used as both a raw material for industry and as a clean power source for transport, industry, business and the home.

The project will underpin Britain's energy security and support the Government's ambitions to ramp up hydrogen use as a clean fuel to enable us to meet legally binding targets to reach net zero carbon emissions by 2050. The Government recently doubled the amount of hydrogen it wants to see produced in the UK by 2030.

In order to facilitate hydrogen being used as a clean fuel in the UK, storage will be essential to respond quickly to peaks in demand. Currently, hydrogen cannot be stored in the national transmission system at the scale that natural gas can.

The North West is seen as a key location for hydrogen production and carbon capture, partly due to its natural assets and partly due to the significant presence of established, energy intensive industries that need to cut their carbon emissions.

It is planned for the KGSP to connect to HyNet North West – the regional hydrogen and carbon capture project planned to produce, store and transport hydrogen around the North West – helping to decarbonise our industries from the mid-2020s. By 2030, HyNet will reduce carbon dioxide emissions by 10 million tonnes every year, the equivalent of taking 4 million cars off the road.

What changes are you proposing to the consented KSGP project to allow you to store hydrogen?

In reality, the changes to the Project are minor in nature. The original consent states that the cavities will be used to store natural gas. The main change is ensuring that the consent states hydrogen can also be stored in the cavities.

The location, amount, size and construction method of the 19 cavities is not planned to change.

The changes we plan to request are:

1. Amendment of the definition of 'gas' to include 'hydrogen'
2. Amendment to reference of 'National Grid's National Transmission System', to give greater flexibility to connect to both the national system and any future hydrogen network
3. Relocation of the planned office building

4. An option to include an alternative location of the planned gas connection compound

Safety

Is underground hydrogen storage safe?

INOVYN Enterprises and its predecessors have been drilling and operating within the Holford Brinefield for generations and have safely created and operated over 200 wells. The area is already home to a number of underground gas storage facilities. These cavities are well-maintained and tightly regulated. Safety is the number one priority for both operators and regulators.

How would you test the safety of the project?

During solution mining, the operating pressure, flow rate and composition of the brine produced would all be monitored. In addition, sonar surveys would be taken of the developing cavities to show that the development is in line with design.

Prior to filling with gas, each completed cavity would undergo extensive mechanical integrity tests.

Once operational, the Gas Processing Plant would be staffed 24 hours a day and controlled using modern computer control systems. Operation of the proposed facility would be regulated under the Control of Major Accident Hazards (COMAH) Regulations by the Health & Safety Executive, which requires regular monitoring and review.

How much hydrogen would you store?

We are looking to amend the existing DCO to give the option of storing hydrogen rather than natural gas. If the change is approved, we will have the option to use the 19 new underground cavities to store 1,300 gigawatt hours of hydrogen – more clean energy than any other facility and enough to heat more than 100,000 homes for an entire year.

Proposed DCO Amendment Documents

Consultation documents

KSGP Consultation newsletter October 2022 – [Click here to download](#)

Proposal Summary Document October 2022- [Click here to download](#)

Public Exhibition Info Boards November 2022 – [Click here to download](#)

Non Material Change Application Documents

Subsurface Safety Assessment Report - [Click here to download](#)

Seismic Survey Report - [Click here to download](#)

The Preliminary Study of Gas Design Capacity Report - [Click here to download](#)

Original DCO with marked up changes - [Click here to download](#)

Draft DCO Amendment Order - [Click here to download](#)

Environmental Report - [Click here to download](#)

You can call: Freephone 0800 689 1095 (Monday to Friday 9.00am to 5.30pm)

You can email: kgsp@fontcomms.com

You can write: Freepost HAVE YOUR SAY

**These contact details will put you in touch with Font Communications, who is managing the community engagement on behalf of Keuper Gas Storage Limited*

Appendix 4 – Exhibition Information Boards

KEUPER GAS STORAGE PROJECT CONSULTATION

We're consulting on plans to change the consented Keuper Gas Storage Project (KGSP) to provide the option of storing hydrogen.

Following this consultation, we expect to finalise and submit the amendment application to the Planning Inspectorate. There will then be another period of consultation, before a final decision is made by the Secretary of State.

If approved, we intend to deliver the KGSP in phases, starting with enabling infrastructure such as construction roads and compounds.

SUBMIT YOUR VIEWS

We encourage you to let us know your views as part of the consultation before 13 November 2022. You can:

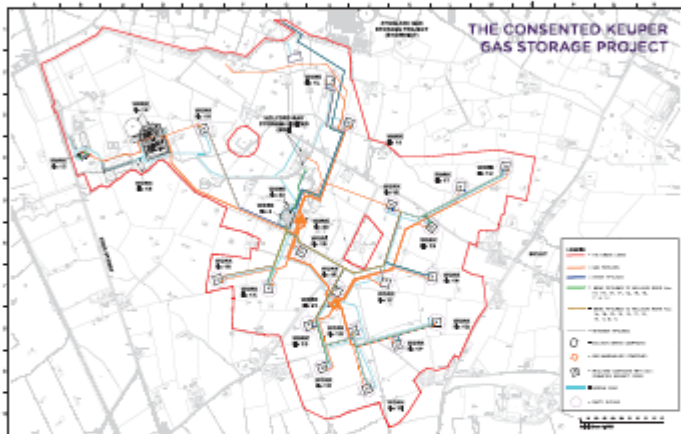
Complete a feedback form (online or hard copy)

Write to:
Freepost HAVE YOUR SAY

Email:
kgsp@fontcomms.com



THE CONSENTED PROJECT



In 2014, Keuper Gas Storage Limited proposed plans for the KGSP.

The KGSP involves using specially designed underground salt cavities – created through solution mining – to store gas. Cheshire's geology means it is one of the few places in the UK where gas can be safely stored underground. INOVYN Enterprises has been solution mining the Holford Brinefield to produce brine for over 90 years.

In 2017, the Secretary of State for Business, Energy and Industrial Strategy (BEIS) granted a Development Consent Order (DCO) for the Project.

The location of the consented cavities can be seen on the above diagram.

WHY HYDROGEN?

Hydrogen is a game-changing source of energy that can be used as both a raw material for industry and as a clean power source for transport, industry, businesses and the home.

The Project will underpin Britain's energy security and support the Government's ambitions to ramp up hydrogen as a clean fuel to enable us to meet legally binding targets to reach net zero carbon emissions by 2050.

Hydrogen storage will be essential to respond quickly to peaks in demand for energy.

It is planned for the KGSP to connect to HyNet North West, the regional hydrogen and carbon capture network planned to produce, store and transport hydrogen around the region.



THE BENEFITS

Delivering the Project and making the change to hydrogen will:



Provide a flexible and secure supply of clean energy to underpin the UK's energy security and transition to net zero emissions



Store enough hydrogen to heat 100,000 homes for an entire year



Be an investment of more than £600 million



Create up to 300 construction and 30 operational jobs



Support INOVYN's businesses at Runcorn by providing brine, which is essential to ongoing operations



Create a community benefit fund, where £30,000 is made available for local community projects each year of main construction

OUR CONSIDERATIONS

An Environmental Statement accompanied the existing Development Consent Order application. We have prepared an Environmental Report which considers whether there would be new or different effects as a result of planned changes.

ECOLOGY

The planned changes are not considered to be significant enough to impact habitats of importance. The proposed locations for the office building and compound are on areas previously intended as construction 'laydown' areas, therefore would have been developed.

LANDSCAPE AND VISUAL IMPACT

We've revisited our previous assessments. Four of the twelve viewpoints we assessed are likely to change, however this will not impact the severity of the visual impact compared to the previous considerations. At one location – the view from King Street – the impact could be reduced.

AIR QUALITY

As the emissions to air will not be affected by the change to hydrogen, it will not change the prediction that impacts are negligible. The Project would provide significant benefits to greenhouse gas emissions from end-users (ie. from industry, homes or transport).

SAFETY

The Project requires a Hazardous Substances Consent to operate. We have already engaged the Health and Safety Executive who have raised no objections to the change to hydrogen. The construction and operation of the cavities would be very similar whether storing hydrogen or natural gas – designed and maintained to national and internationally recognised safety standards.



Appendix 4 – Newspaper Advert

THE KEUPER GAS STORAGE PROJECT

TO UNDERPIN THE UK'S EFFORTS TO HELP TACKLE CLIMATE CHANGE AND REACH NET ZERO EMISSIONS BY 2050, INOVYN IS PLANNING THE UK'S LARGEST HYDROGEN STORAGE FACILITY.

The plans will see the previously consented Keuper Gas Storage Project (KGSP) at the Holford Brinefield to the north of Middlewich, Cheshire, amended to give the option of storing hydrogen rather than natural gas.

INTERESTED IN THE PLANS AND WANT TO FIND OUT MORE?

We are launching consultation on our plans which runs until 13th November 2022.

- Attend our online Q&A, Wednesday 2nd November 2022, 6.30pm - register at www.kgsp.co.uk
- Attend our Information Day where you can meet members of the project team and ask any questions. Byley Village Hall, Moss Lane, Byley, Cheshire, CW10 9NG, Thursday 3rd November 2022, 3-7pm

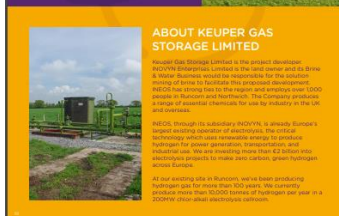
inovyn
An INEOS company

FOR MORE INFORMATION

- Visit our website www.kgsp.co.uk
- Call: Freephone 0800 689 1095 (Monday to Friday 9.00am to 5.30pm)
- Write: Freepost HAVE YOUR SAY
- Email: kgsp@fontcomms.com

Appendix 5 – Proposal Summary Document

The below shows the first three pages. The full document is available to view here:



Appendix 6 – Minutes from the KGSP Local Liaison Group

Item	Summary	Actions
Meeting	Keuper Gas Storage Project (KGSP) Local Liaison Group (LLG)	
Details	Tuesday 1 November 2022, 6pm – 7pm, via MS Teams	
Attendees	<p>Richard Stevenson, INOVYN John Beecroft (Byley Parish Meeting) Simon Moorhead (Byley Parish Meeting) Andrea Stott (Byley Parish Meeting) Hazel West (Allostock Parish Council) Steven Holmes (Cheshire West and Chester Council) Lewis Jones, Font Comms (Chair)</p> <p>Apologies: Janet Ward, INOVYN Paul Spare (Davenham Parish Council) Tony Roberts (Lach Dennis Parish Council) Julia Wilson (Allostock Parish Council)</p>	
Item 1	Welcome and introductions	
	Chair Lewis Jones (LJ) welcomed attendees to the meeting and provided introductions.	
Item 2	Review and agreement of minutes	
	LJ noted that several members had difficulty joining the last quarterly meeting in May, but that the minutes had been circulated. He committed to attaching the May minutes to attendees following the meeting.	LJ
Item 3	KGSP Construction Progress Update	
	<p>Richard Stevenson (RS) provided an update on the progress of construction of the consented KGSP. He explained how good progress had been made to deliver the updates to the roads, as discussed at previous meetings.</p> <p>The work is complete at Yatehouse Lane, including resurfacing, repainting of lines on the road, re-planting of the hedgerow further back and installation of Cheshire railings around the entrance. John Beecroft (JB) said that there had been comments from residents pleased about the work done and the railings installed.</p> <p>RS said that it was hoped similar work would commence on Drakelow Lane before Christmas – which would be ideal to enable the hedgerow to be planted in winter. RS added that the work would require a full road closure, but the length of the closure would be kept to a minimum. He added that the ability to allow Uniper vehicles through, to avoid them being diverted elsewhere, would be explored.</p> <p>Simon (SM) and Andrea (AS) asked to receive a copy of the roadwork plans. LJ committed to sending these with the minutes.</p> <p>RS explained the hedgerow was being planted back from the entrance in order to increase visibility – a requirement of the consent to support residents entering the site as well as any emergency vehicles etc. He reiterated that whilst</p>	LJ

	<p>these junctions had been improved, vehicles associated with the KGSP would not be routed through Byley and would access the site via the existing entrance on King Street.</p> <p>AS asked how long the build period would be. RS explained that the overall programme would be around 8-10 years. However, he explained this is not continuous work, it is focused work at different parts of the site and a mix of activities including initial drilling of the caverns; solution mining; and then installing gas storage infrastructure. RS said this was a phased and considered approach, with impacts on the surrounding areas minimised throughout.</p>	
Item 4	Hydrogen consultation and information	
	<p>RS provided an update on progression of the non-material change to the DCO, to provide the option of storage hydrogen.</p> <p>SM asked whether the project had been accelerated as a result of the current energy climate. RS said that the Project did feature as a priority project in the Government's Growth Plan, alongside HyNet North West, however there had been a change in Government since its publication.</p> <p>He explained that creating more energy storage remains a national priority. RS explained that the UK has less gas storage than other countries, for example Germany. He added that hydrogen storage is a good way of storing renewable electricity – with 3.7TWh wasted in 2020 for example. He added that KGSP would be the equivalent of 1000 times the size of the world's largest battery storage facility in California, providing the ability to store renewable energy when it's not needed and release it at times of heightened demand.</p> <p>AS asked about the safety of storing hydrogen. RS provided an overview of the safety features that will be in place at the storage facility, including control systems and independent fail safe systems. He explained that the safety record of gas storage is very good, with hydrogen already stored in this way in the UK.</p> <p>RS outlined the required permitting, including the Hazardous Substances Consent, which is required to operate. He noted that the Health and Safety Executive (HSE) has already provide an opinion that there is no change in safety risks associated with change from natural gas to hydrogen on the application for the KGSP. The application is now with Cheshire West and Chester Council for consideration and decision. The operation of the facility would be also be governed by the Control of Major Accident Hazards (COMAH) legislation, with pre-construction and pre-operation reports required. Steven Holmes (SH) said that the council was considering the application and responding to one stakeholder enquiry about the application.</p> <p>AS said the KSGP represented further industrialisation of the area and asked whether there would be lots of transport movements and noisy testing of sirens. RS said all of the construction and operation transport will be routed via the existing entrance on King Street, not via Byley, and that there shouldn't be testing of sirens more than once a week from the gas processing plant.</p> <p>RS outlined how the team was carrying out community consultation ahead of submission of the non-material change, which would be before Christmas. The consultation involved writing to surrounding residents and businesses, and holding a drop-in event at Byley Village Hall. JB said some residents had raised</p>	

	questions about safety and he had encouraged them to attend the event to speak to the team.	
Item 5	Interim Community Environmental Fund 2022	
	LJ confirmed that the last approval for a project was for the Lach Dennis planters, which had been communicated to the applicant. He committed to re-sharing the guidance and application forms, with the fund still open and funds available to support eligible projects.	LJ
Item 6	Date of next meeting	
	The date of the next meeting was confirmed as Tuesday 31 January 2022. A calendar invitation with dial-in details will be issued to members.	LJ
Item 7	Any other business	
	N/A	

Item	Summary	Actions
Meeting	Keuper Gas Storage Project (KGSP) Local Liaison Group (LLG)	
Details	Tuesday 31 January 2023, 6pm – 7pm, via MS Teams	
Attendees	Richard Stevenson, INOVYN Steven Holmes (Cheshire West and Chester Council) John Beecroft (Byley Parish Meeting) Mark Powell (Davenham Parish Council) Lewis Jones, Font Comms (Chair) Apologies: Janet Ward, INOVYN Paul Spare (Davenham Parish Council) Julia Wilson (Allostock Parish Council)	
Item 1	Welcome and introductions	
	Chair Lewis Jones (LJ) welcomed attendees to the meeting and provided introductions.	
Item 2	Review and agreement of minutes	
	No comments were raised on the minutes from the previous meetings.	
Item 3	KGSP Construction Progress Update	

	<p>Richard Stevenson (RS) provided an update on the progress of construction of the consented KGSP. He explained that work at Yatehouse Lane and Brownheyes Drive is now complete. The team will monitor the newly planted hedgerow and seeded grass.</p> <p>Previously, it was reported that work on Drakelow Lane had been delayed. Following engagement with the landowner, this was completed in December, with re-tarmacking and changes made to the entranceways. All that remains to be completed is installation of the Cheshire railings, due to delays with the supplier. This is likely to happen in early March.</p> <p>This will then complete the first phase of construction.</p>	
Item 4	Submission of non-material change application	
	<p>RS explained that, following pre-application consultation with a drop-in event in Byley, the non-material change application for the KGSP was submitted in November 2022, followed by a period of statutory consultation.</p> <p>He provided an overview of the responses from the statutory consultees, with no objections or issues raised ahead of the 6 January 2023 deadline. He explained that a Consultation Summary document had been submitted to the Planning Inspectorate and that this would be made available on the KGSP website.</p> <p>SH asked for confirmation about next steps and likely timescales. RS outlined how, given no indication was given whether the desired changes were non-material, the application has been submitted as a non-material change and the team is now waiting for a decision from BEIS. Other applications have taken up to 6 months for a final decision from the Secretary of State, but the timeline is currently not confirmed. RS will engage with BEIS to understand the likely decision timeline.</p>	<p>LJ</p> <p>RS</p>
Item 5	Date of next meeting	
	The date of the next meeting was confirmed as Tuesday 25 April 2023.	LJ
Item 7	Any other business	
	N/A	

Appendix 7 – Consultation Letters



Keuper Gas Storage Limited
Northwich Sites
Holford Brinefields
Lostock Gralam
Northwich, Cheshire
CW9 7TD

Tel: Freephone 0800 689 1095

Dear Councillor,

Re: Consultation on amendment to the Keuper Gas Storage Project, Cheshire

I wanted to let you know that Keuper Gas Storage Limited (KGSL) has launched a consultation on proposed underground hydrogen storage in Cheshire – an essential project to cut carbon emissions and increase energy security.

The consultation, on an amendment to the Development Consent Order (DCO), will run until 13th November 2022.

You may recall, we brought forward proposals for the Keuper Gas Storage Project (KGSP) in 2014. We proposed to extract brine from underground cavities at the Holford Brinefield and the surrounding area north of Middlewich, Cheshire. Once solution mined, the cavities would then be used to store natural gas. A DCO for the KGSP was granted by the Secretary of State in 2017.

We're now seeking to amend the original consent, to give the option to store hydrogen. The change, which can be achieved without any changes to the location or design of the 19 cavities, will help underpin both the UK's energy security and transition to net zero emissions by 2050. If approved, the hydrogen storage facility will link to HyNet North West, the regional hydrogen and carbon capture network.

Seeking your views


KGSL is seeking your views as part of consultation on the amendment application. Please find enclosed a copy of the newsletter, which is being circulated to those living and working around the consented gas storage site and contains details of our proposed changes.

Further documents, including a Proposal Summary Document and an Environmental Report are available on request or can be downloaded from the 'Library' page of the project website at:

Consultation responses

There are several ways you can find information about the Project and the change application:

- Attend our online Q&A: Wednesday 2nd November 2022, 6.30pm ([register here](#))
- Attend our Information Day: Thursday 3rd November 2022, Byley Village Hall, Moss Lane, Byley, Cheshire, CW10 9NG.
- Call us: Freephone 0800 689 1095 (Monday to Friday, 9am – 5.30pm)
- Email us: kgsp@fontcomms.com

- 
- **Write to us: Freepost HAVE YOUR SAY**

Alternatively, if you wish to speak to or set up a meeting with a member of the project team to discuss the proposed amendment, please get in touch via the above contact details.

Please don't hesitate to get in touch if you have any questions.

Yours sincerely,

Richard Stevenson
On behalf of INOVYN and Keuper Gas Storage Limited

Appendix 8 – Reg 7 Public Notice, Letters and Recipients

SECTION 153 OF THE PLANNING ACT 2008

PARAGRAPH 2 OF REGULATION 6 OF THE INFRASTRUCTURE PLANNING (CHANGES TO, AND REVOCATION OF, DEVELOPMENT CONSENT ORDERS) REGULATIONS 2011 (SI 2011/2055)

NOTICE OF APPLICATION TO MAKE A NON-MATERIAL CHANGE TO THE FOLLOWING DEVELOPMENT CONSENT ORDER:

Keuper Underground Gas Storage Facility Order 2017 (SI 2017:433) (as amended)

1. The contact details of the applicant are: Keuper Gas Storage Limited, Bankes Lane Offices, Bankes Lane, PO Box 9, Runcorn, Cheshire WA7 4JE; email: kgsp@fontcomms.com
2. Keuper Gas Storage Limited (referred to in the application as “KGSL”) is seeking, by way of an application to the Secretary of State, a change to be made to the above mentioned Development Consent Order which is not material.
3. The Keuper Gas Storage Project (KGSP) involves using specially designed underground salt cavities created through solution mining – to store gas. The project was granted a Development Consent Order (DCO) in 2017.


The application seeks to make non-material changes to the nature of gas stored to include the option of hydrogen gas storage, and to the location of one building and one compound; necessitating minor updates to the Landscape Plans, Works Plans and Elevation Plans. The location, amount, size and construction method of the 19 cavities is not planned to change.

The changes proposed to the Plans include:

1. Amendment of the definition of ‘gas’ to include ‘hydrogen’
 2. Amendment to reference of ‘National Grid’s National Transmission System’, to give greater flexibility to connect to both the national system and any future hydrogen network
 3. Relocation of the planned office building
 4. An option to include an alternative location of the planned gas connection compound
- An update to the registered address of the undertaker is also included.

4. The application documents and plans showing the nature and location of the land concerned can be viewed free of charge on the Planning Inspectorate’s website (*maintained on behalf of the Secretary of State*):

<https://infrastructure.planninginspectorate.gov.uk/projects/north-west/keuper-gas-storage-project/?ipcsection=docs> (Dedicated ‘Keuper Gas Storage’ page; ‘Documents’ page)



Also free of charge on the applicant's (KGSL) website at: [REDACTED] (Non Material Change Application Documents).

For enquiries in relation to the documents, plans, maps and non-material change application, the applicant can be contacted on Freephone 0800 689 1095 (Monday to Friday 9.00am to 5.30pm).

5. They can also be inspected, free of charge, until Friday 6th January 2023 at: INOVYN, Holford Brinefield Offices, Lostock Gralam, Northwich, Cheshire, CW9 7TD. Opening hours: Monday to Friday: 9.00am-4.00pm. To arrange a viewing contact the team on kgsp@fontcomms.com or 0800 689 1095.

A free digital copy of the application can be viewed / downloaded from KGSL's website using the link provided above. Alternatively, a paper copy can be obtained from KGSP for £50 by calling 0800 689 1095.

6. Please send any representations about the application by email to KeuperGSP@planninginspectorate.gov.uk or in writing to: National Infrastructure Planning, The Planning Inspectorate, Temple Quay House, 2 The Square Temple Quay Bristol BS1 6PN. Please quote "KeuperGSP Project – Non-Material Change 1 EN030002" on any correspondence. If you have difficulty in submitting a representation by email, please contact KeuperGSP@planninginspectorate.gov.uk or 0303 444 5000 and a member of the Planning Inspectorate's case team will be able to assist.

Any responses to publicity should focus only on the change that is being proposed to the infrastructure project (including, where appropriate, the impact of the change on the project as a whole). Responses should not go into details of wider matters relating to the underlying principles of a project, or other matters not directly related to the change applied for. This would include those matters considered in the examination of the original application for a Development Consent Order and in the Secretary of State's decision on that application.

Please note that any representations received by the Planning Inspectorate in response to the consultation will be handled in compliance with the United Kingdom's General Data Protection Regulation and published on the relevant page of the Planning Inspectorate's Infrastructure Planning Portal (<https://infrastructure.planninginspectorate.gov.uk/projects/north-west/keuper-gas-storage-project/>) with all personal information removed.

The deadline for receipt of representations is 23:59 Friday 6th January 2023.



Keuper Gas Storage Limited
Banks Lane Office
Banks Lane
PO Box 9
Runcorn, Cheshire
WA7 4JE
United Kingdom

17 November 2022

To Whom It May Concern,

Keuper Underground Gas Storage Facility Order 2017, made 15th March 2017

Application for a Non-Material Change in relation to the nature of gas stored and layout of the site.

Keuper Gas Storage Limited (KGSL) has submitted an application in accordance with the Planning Act 2008 ("2008 Act") and the Infrastructure Planning (Changes to, and Revocation of, Development Consent Orders) Regulations 2011 ("2011 Regulations") to make non-material changes to the Keuper Underground Gas Storage Facility Order 2017 ("2017 Order").

I am writing in accordance with Regulation 7 of the 2011 Regulations to consult you on the proposed non-material changes.

The Keuper Gas Storage Project (KGSP) involves using specially designed underground salt cavities – created through solution mining – to store gas. The project was granted a Development Consent Order (DCO) in 2017.

We are now seeking consent from the Secretary of State for Business, Energy and Industrial Strategy to change the nature of gas stored to include the option of hydrogen gas storage and to the location of one building and one compound; necessitating minor updates to the Landscape Plans, Works Plans and Elevation Plans. The location, a mount, size and construction method of the 19 cavities is not planned to change.


The changes proposed to the Plans include:

1. Amendment of the definition of 'gas' to include 'hydrogen'
2. Amendment to reference of 'National Grid's National Transmission System', to give greater flexibility to connect to both the national system and any future hydrogen network
3. Relocation of the planned office building
4. An option to include an alternative location of the planned gas connection compound

Please find enclosed a copy of the public notice which will appear in the Northwich Guardian and Runcorn & Widnes Weekly News in the weeks commencing 21st and 28th November. This sets out the changes proposed to the DCO; where the application documents can be viewed; and where to send any representations.

Keuper Gas Storage Limited
Registered in England & Wales No 8850140
Registered Office: Banks Lane Office - Banks Lane - PO Box 9 -
Runcorn - Cheshire - WA7 4JE - United Kingdom

INOVYN™ is a trademark, the property of INOVYN ChlorVinyls Limited
INEOS™ is a trademark, the property of INEOS Capital Limited



The application documents and plans showing the nature and location of the land concerned can be viewed free of charge at [REDACTED] (Non Material Change Application Documents).

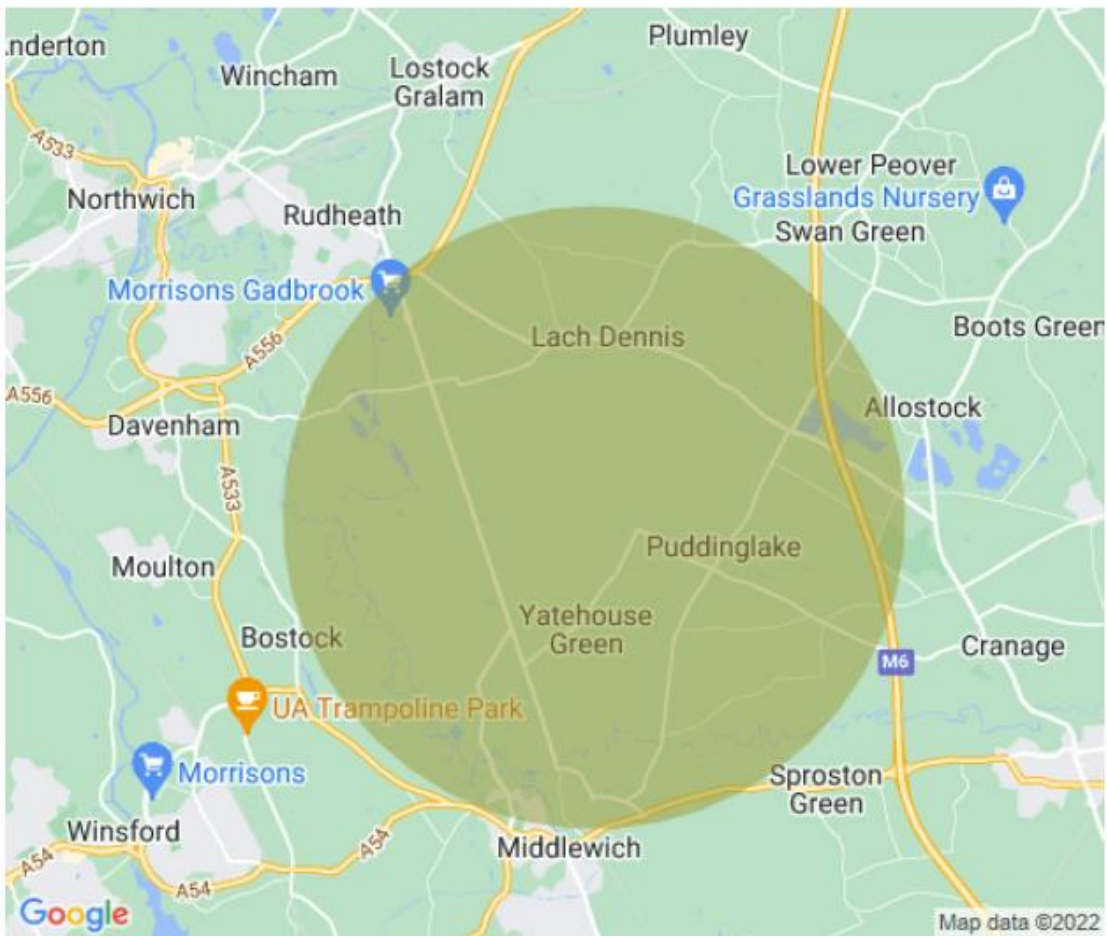
The deadline for receipt of representations is 23:59 Friday 6th January 2023.

If you have any questions on the plans you can contact the project team on kgsp@fontcomms.com or 0800 689 1095.

Yours sincerely


Richard Stevenson
KGSP Project Manger
On behalf of
Keuper Gas Storage Limited

Circulation area of 3.5km around the main gas storage site



List of Regulation 7 notification recipients


1st Over St. Johns Scout Group
4th Runcorn Scouts
Age UK Cheshire
Allostock Parish Council
Anderton with Marbury Parish Council
Aston Parish Council
Beechwood West Management Limited
Bostock Parish Council
Byley Community Association
Byley County Primary School
Byley Parish Meeting
Cavendish High School
Cheshire and Merseyside Health and Care Partnership
Cheshire and Warrington LEP
Cheshire Community Development Trust
Cheshire East Council
Cheshire Fire and Rescue Service
Cheshire Region Biodiversity Partnership
Cheshire West & Chester Council
Cheshire West & Chester Highways Department
Cheshire Wildlife Trust
Cheshire Community Action
Civil Aviation Authority
Comberbach Methodist Church
Comberbach Parish Council
Comberbach Primary School



CPRE Cheshire
Cranage Parish Council
Davenham Parish Council
Dee Valley Water United Utilities
Dutton Parish Council
E.ON UK PLC
East Cheshire Chamber of Commerce
East Cheshire NHS Trust
Energetics Gas Ltd
English Heritage
ES Pipelines Ltd
ESP Connections Ltd
ESP Electricity Ltd
ESP Networks Ltd
ESP Pipelines Ltd
Flintshire County Council
Flintshire County Council
Forestry Commission
Friends of the Earth, North West
Fulcrum Pipelines Limited
Goostrey Parish Council
Groundwork Cheshire
GTC Pipelines Limited
Guides Middlewich
Halton and Saint Helens Voluntary Community Action
Halton Borough Council
Halton Borough Council Highways
Halton Chamber of Commerce & Enterprise
Highways Agency Historical Railways Estate



Historic England
Holmes Chapel Parish Council
Hope Corner Community Church & Hope Corner Academy
Independent Pipelines Limited
Independent Power Networks Limited
INEOS Enterprises Ltd
Knowsley Council
Lach Dennis Parish Council
Little Leigh Parish Council
Little Leigh School
Liverpool City Council
Liverpool John Lennon Airport
Liverpool LEP
Lostock Gralam Parish Council
Lower Peover Parish Council
Manchester Ship Canal Company
Marston Parish Council
Mid Cheshire College
Mid Cheshire Hospitals NHS Foundation Trust
Middlewich Cubs & Scouts
Middlewich Heritage Society
Middlewich Parish Council
Middlewich Vision
Ministry of Defence
Moulton & District Community Association
National Grid Electricity Transmission PLC
National Grid Gas PLC
National Grid PLC
National Highways



NATS En-route (NERL) Safeguarding
Natural England
Network Rail Infrastructure Ltd
NHS Cheshire CCG
NHS Cheshire, Warrington and Wirral Area Team
NHS England
NHS Merseyside Area Team
NHS West Cheshire CCG
Northwich & District Youth Centre
Northwich Methodist Church
Northwich Parish Council
Northwich School of Music
Northwich Town Council
Northwich Victoria Football Club
Ormiston Bolingbroke Academy, Runcorn
Peel Ports Group (Manchester Ship Canal)
Plumley Parish Council
Police and Crime Commissioner Cheshire
Police and Crime Commissioner Merseyside
Preston Brook Parish Council
Quadrant Pipelines Ltd
Rocksavage Power Company Ltd
Royal Mail Group
Rudheath Parish Council
Rudheath Primary School
Runcorn Bowling Club
Runcorn Golf Club
Runcorn Residents Federation
Shropshire Council

SP Distribution Limited
SP Manweb PLC
Sproston Parish Council
SSE Pipelines
St Chads Catholic & C of E High School
St Helens Metropolitan Borough Council
St Luke's Church
St Mary's Catholic Church, Middlewich
Stanthorne Parish Council
Sutton Parish Council
The Bridgewater Canal Company Ltd
The Canal and River Trust
The Civil Aviation Authority
The Coal Authority
The Crown Estate
The Electricity Network Company
The Environment Agency
The Gas Transportation Company Ltd
The Health and Safety Executive
The Heath School
The Marine Management Organisation
The Maritime and Coastguard Agency
The Port of Western (Westlink Holdings Ltd)
UK Health Security Agency
University of Chester Academy, Rudheath
University of Manchester
Utility Assets Limited
Warrington and Halton Hospitals NHS
Warrington Borough Council



Warrington Chamber of Commerce
Weaver Valley Cycling Club
West Cheshire and North Wales Chamber of Commerce
Weston Point Primary School
Weston Primary School
Whitley Parish Council
Whitley Village School
Wincham Parish Council
Winsford Parish Council
Wirral Borough Council
Witton Albion Football Club Ltd, Norwich
Witton Church Walk C of E Primary School
Wrexham County Borough Council
Youth Federation