

DRAFT STATEMENT OF COMMON GROUND WITH ENVIRONMENT AGENCY

HyNet Carbon Dioxide Pipeline DCO

Planning Act 2008

The Infrastructure Planning (Examination Procedure) Rules 2010 - Rule 8(1)(c)

Document Reference Number D.7.2.5

Applicant: Liverpool Bay CCS Limited

Inspectorate Reference: EN070007

English Version

REVISION: A

DATE: April 2023

DOCUMENT OWNER: WSP UK Ltd

PUBLIC

QUALITY CONTROL

Document Reference	D.7.2.5				
Document Owner	WSP				
Revision	Date	Comments	Author	Check	Approver
A	April 2023	Deadline 1 updates	CP	AV	AH

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STATEMENT OF COMMON GROUND

This Statement of Common Ground has been prepared and agreed by (1) Liverpool Bay CCS Limited and (2) Environment Agency

Signed

[NAME]

[POSITION]

on behalf of Liverpool Bay CCS Limited

Date: **[DATE]**

Signed

[NAME]

[POSITION]

on behalf of Environment Agency

Date: **[DATE]**

TABLE OF CONTENTS

1. INTRODUCTION.....	5
1.1. Purpose of this document.....	5
1.2. The DCO Proposed Development.....	5
1.3. Terminology	5
2. RECORD OF ENGAGEMENT	7
3. ISSUES.....	12

TABLES

Table 2-1 – Record of Engagement in relation to the DCO Proposed Development	8
Table 3-1 – Engagement, ES & Other Application Documents	13
Table 3-2 Issues related to the DCO Proposed Development – EIA Scoping Opinion	13
Table 3-3 Issues related to the DCO Proposed Development – Drainage, Flood Risk and Groundwater	14
Table 3-4 Issues related to the DCO Proposed Development - WFD Compliance	14
Table 3-5 Issues related to the DCO Proposed Development – Land and Soils	16
Table 3-6 Issues related to the DCO Proposed Development - Ecology	17

1. INTRODUCTION

1.1. PURPOSE OF THIS DOCUMENT

- 1.1.1. This draft Statement of Common Ground (SoCG) has been prepared by Liverpool Bay CCS Limited (the Applicant) and the Environment Agency (EA).
- 1.1.2. For the purpose of this draft SoCG, the Applicant and EA will jointly be referred to as the 'Parties'.
- 1.1.3. The purpose of this draft SoCG is to set out the agreement that has been reached between the Parties in respect of a number of matters related to the Development Consent Order (DCO) Proposed Development. It also lists any points on which discussions are ongoing. SoCGs are an established means in the DCO planning process of allowing all Parties to identify and so focus on specific issues that may need to be addressed during the examination.
- 1.1.4. **Chapter 2** of this draft SoCG records the consultation undertaken with EA by the Applicant. **Chapter 3** of this draft SoCG sets out the areas of agreement in relation to the above matters, and any areas of ongoing discussion between the Parties.

1.2. THE DCO PROPOSED DEVELOPMENT

- 1.2.1. HyNet (the Project) is an innovative low carbon hydrogen and carbon capture, transport and storage project that will unlock a low carbon economy for the North West of England and North Wales and put the region at the forefront of the UK's drive to Net-Zero. The detail of the project and the DCO Proposed Development can be found in the main DCO documentation. The DCO Proposed Development and this SoCG relate to the onshore CO₂ pipeline element of HyNet only. Other elements of HyNet are subject to separate consenting processes and are not addressed here.
- 1.2.2. The DCO Proposed Development impacts EA primarily as a statutory environmental body and land interest.
- 1.2.3. *The Applicant has identified the following plots in which EA hold an interest:*
1-04, 1-06, 1-07, 1-21, 12-10, 1-25, 2-01, 3-14, 3-15, 3-17, 4-07, 4-10, 4-13, 5-14, 5-16, 5-24, 5-25, 5-26, 6-02, 6-03, 6-07, 6-10, 6-11, 6-12, 6-14, 6-17, 6-19, 6-23, 9-16, 9-17
- 1.2.4. A full description of the DCO Proposed Development is detailed in Chapter 3 of the Environmental Statement (ES) **[APP-055]**.

1.3. TERMINOLOGY

- 1.3.1. In the Issues tables in **Chapter 3** of this draft SoCG, 'Agreed' and 'Not Agreed' indicates a final position, and 'Under Discussion' indicates where these points

will be the subject of on-going discussion wherever possible to resolve or refine, the extent of disagreement between the Parties.

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2. RECORD OF ENGAGEMENT

- 2.1.1. This chapter provides a summary of the engagement undertaken to date between the Parties in relation to the DCO Proposed Development.

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Table 2-1 – Record of Engagement in relation to the DCO Proposed Development

Date	Form of Correspondence	Key Topics Discussed and Key Outcomes
02/03/2022	Microsoft Teams meeting between EA and Applicant	<p>Key Topics</p> <ul style="list-style-type: none"> • Water Framework Directive (WFD) Screening and Scoping Exercise (Water bodies, activities, quality elements) • WFD Assessment Methodology • Proposed mitigation • Discussion and agreement on WFD Screening Conclusion • Biodiversity Net Gain (BNG) - River Condition Assessment <p>Discussions and Outcomes</p> <p>The Applicant confirmed that screening and scoping of WFD elements has not been included within the Preliminary Environmental Information Report (PEIR).</p> <p>The Applicant confirmed that Stanney Main Drain to be assessed in the WFD.</p> <p>The EA confirmed that smaller watercourses within the wider WFD water body should be included in the WFD assessment, with tributaries of the Mersey transitional water body to be assessed using surface water quality elements and summarised within the transitional water body section of the WFD assessment.</p> <p>The EA confirmed that it is acceptable to undertake one WFD assessment and provide it to both Natural Resources Wales (NRW) and the EA to support the DCO Proposed Development application.</p> <p>If culverts are required for temporary crossings, an assessment of effects would be needed in the WFD though the assessment would not need to include modelling. The EA retain a no culverting policy in the construction phase, even those of a temporary nature, as they want to ensure short term impacts are as minimal as possible</p> <p>Manchester Ship Canal may need to be screened in for assessment as water from Ince pumping station (EA operated) is pumped into it. Water quality elements only to be assessed - not morphological or biological.</p> <p>The EA confirmed aspirations for the setting back of the flood embankments along the river Gowy in the vicinity of the proposed pipeline crossing. The design and depth of the pipeline therefore needs to allow for the re-naturalisation of the platform of the river at this location.</p> <p>If the pipeline is laid and the riverbed is returned to existing conditions with no bed reinforcement, then this is considered as reinstatement for the purposes of biodiversity calculations and river condition.</p> <p>The EA confirmed that sediment sampling does not need to be included within the WFD. It must be ensured that there is no deterioration to water bodies and that mitigation measures (for the WFD waterbodies) are not prevented from being implemented.</p> <p>The Applicant confirmed that within the Flood Risk Assessment (FRA), the main pipeline will be captured in one section, as impacts are likely to be the same. The Above Ground Installations (AGIs) and Block Valve Stations (BVS) will be assessed individually in the same FRA.</p>

Date	Form of Correspondence	Key Topics Discussed and Key Outcomes
		<p>The EA agreed it is reasonable for the Applicant to make reference to the drainage design and strategy prepared by its consultant as a separate document, but also need to consult with the Lead Local Flooding Authority (LLFA) for their individual requirements.</p> <p>The EA confirmed that it does not have a preference as to whether Flood Risk Activity Permit (FRAPs) applications are submitted for individual watercourses or all watercourses in one application. The FRA assesses only permanent works. Flood risk impacts associated with the construction phase will be managed through the Construction Environmental Management Plan (CEMP) and FRAPs as required.</p> <p>The EA indicated that the vulnerability of the pipeline should be considered as “water compatible” and if a hazardous substance consent is needed for the AGIs then the classification would move to “highly vulnerable”. It was subsequently decided to classify the DCO Proposed Development as essential infrastructure which could be transitioned into further assessments. No further action on this topic required.</p> <p>When applying for FRAPs for temporary crossings, EA confirmed that if there is a clear span structure, then everything is beyond limits of channel. The EA retain a no culverting policy in the construction phase, even those of a temporary nature, as they want to ensure short term impacts are as minimal as possible. No dig methods may not necessarily require FRAPs and the guidance regarding this needs to be consulted by the designer/applicant. The EA has made the Applicant aware temporary culverts may be deemed inappropriate in some instances (i.e., temporary bridges may be a preferable option), however, this would need to be discussed with Flood Risk, Ecology and Geomorphology advisors. The Applicant may seek temporary crossings as part of the construction phase.</p> <p>If proceeding with the FRAP exemption for boring under earth embankments on the river Gowy there are specific criteria around no-dig techniques. If work cannot meet standards, then the Applicant will need to apply for a permit. EA would look at proximity of the excavated work areas to the embankments and ensure any construction in close proximity to defences has been well considered.</p>
15/03/2022 to the 20/04/2022	Email correspondence between EA and Applicant	<p>Key Topics</p> <ul style="list-style-type: none"> • Data Request <p>Discussions and Outcomes</p> <p>Obtained information on hydraulic modelling from EA.</p>
06/06/22	Email correspondence between EA and Applicant	<p>Key Topics</p> <ul style="list-style-type: none"> • Tidal and fluvial flooding at Ince AGI location <p>Discussions and Outcomes</p> <p>The EA confirmed that the area is defended against tidal flooding and there is usually no requirement for compensatory flood storage for development either in areas located behind flood defences (areas benefitting) or in locations at risk of tidal flooding only.</p> <p>Raising ground or finished floor levels is generally considered a simple and effective way of reducing the risk of flooding.</p>
07/06/22	Email correspondence between EA and Applicant	<p>Key Topics</p> <ul style="list-style-type: none"> • Tidal and fluvial flooding at Ince AGI location

Date	Form of Correspondence	Key Topics Discussed and Key Outcomes
		<p>Discussions and Outcomes</p> <p>The EA confirmed that the pumping stations controlling water levels in the Ince Marshes are monitored and alarms are generated should the pumping stations fail. The EA would respond to these failures by investigating the faults within four hours. A repair or contingency plan would be implemented if needed at a later date.</p>
25/07/2022	Email correspondence between EA and Applicant	<p>Key Topics</p> <ul style="list-style-type: none"> • Updated crossing techniques and construction methodologies for watercourses • River Gowy crossing <p>Discussions and Outcomes</p> <p>The EA agreed that the email allays concerns raised over open trench crossings at the River Gowy. Further discussion will be required on proposed construction methods for watercourse crossings and existing flood defences as part of the Examination process.</p>
08/09/2022	Microsoft Teams meeting between EA and Applicant	<p>Key Topics</p> <ul style="list-style-type: none"> • Groundwater assessment approach and methodology <p>Discussions and Outcomes</p> <p>The EA were positive and agreed with the assessment approach. The EA confirmed they would offer formal agreement once they have reviewed the ES.</p>
03/10/2022	Email correspondence between EA and Applicant	<p>Key Topics</p> <ul style="list-style-type: none"> • Provided the FRA to the EA for review and comment <p>Discussions and Outcomes</p> <p>The EA has agreed that they would review the FRA as and when, or if required under agreement.</p>
23/01/2023	Microsoft Teams meeting between EA and Applicant	<p>Key Topics</p> <ul style="list-style-type: none"> • Update on key milestones of HyNet DCO application. • Discuss early first draft on Statement of Common Ground (SoCG). <p>Discussions and Outcomes</p> <p>Review of template structure, general layout agreed.</p> <p>The Applicant confirms the front-end section will be updated to include land plots EA hold an interest in.</p> <p>Table of correspondence agreed as accurate.</p> <p>EA looking to provide detailed comments towards the end of February and will continue engagement.</p>
07/03/2023	Microsoft Teams meeting between EA and Applicant	<p>Key Topics</p> <ul style="list-style-type: none"> • Discussion on the content of the second draft of the SoCG.

Date	Form of Correspondence	Key Topics Discussed and Key Outcomes
		<p>Discussions and Outcomes</p> <p>EA clarified details on land plots at the section of the River Gowy at Wimbolds as the area affected by the pipeline. The Applicant confirmed a review will be undertaken and the document updated to include any missing plots.</p> <p>The EA advised that additional work is required to improve the conceptual site model and provide improved characterisation of land quality and risk to 'controlled waters'.</p> <p>The EA recommended additional wording to be added to the Phase II Ground Investigation Report to reflect the emerging nature of the contaminant of concern, the potential difficulties in dealing with it and that additional permitting may be required.</p> <p>EA advised their interests reflected in the Book of Reference are to remain under discussion until the cross references list is accurate.</p>

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3. ISSUES

3.1.1. This chapter sets out the areas of agreement in relation to specific issues relating to the DCO Proposed Development, and any areas of ongoing discussion between the Parties. The topics discussed between the Applicant and EA are as follows:

- Engagement, ES & Other Application Documents;
- Issues related to the EIA Scoping Opinion;
- Drainage, Flood Risk and Groundwater;
- WFD Compliance;
- Land and Soils; and
- Ecology

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Table 3-1 – Engagement, ES & Other Application Documents

Ref.	Description of Matter	Current Position	Status
Engagement			
EA 3.1.1	Engagement	The Parties agree that engagement has been ongoing in the pre-application period (as set out in the record of engagement) and the Applicant has sought to bring forward a design which has had regard to EA's views. EA has been formally consulted on the application as required by the Planning Act 2008 (PA2008).	Agreed
ES			
EA 3.1.2	ES	The Parties agree that the study area as set out in the ES is appropriate. The Parties agree that the baselines as set out in the ES are appropriate. The Parties agree that the impact assessment methodologies used in the ES are appropriate. The Parties agree that the mitigation proposed in the ES is appropriate. EA considers that appropriate regard has been had to its proposals in the cumulative assessment having regard to the level of information available. EA concurs with the conclusions of the ES.	Under Discussion
Other application documents			
EA 3.1.3	Other application documents	The EA have advised that their interests are limited to ownership of plots: 6-02; 6-03; 6-06; 6-10; 6-11; 6-12 as reflected in the Book of Reference [AS-023], and request whether the other plots identified in the original draft Statement of Common Ground are in regards to areas of EA interest on environmental matters. The Parties continue to engage on this matter.	Under Discussion

Table 3-2 Issues related to the DCO Proposed Development – EIA Scoping Opinion

Ref.	Description of Matter	Current Position	Status
EA 3.2.1	River Gowy	EA agreed in principle on 05 August 2022 to the use of trenchless crossing technology to construct the pipeline beneath the River Gowy.	Agreed

Table 3-3 Issues related to the DCO Proposed Development – Drainage, Flood Risk and Groundwater

Ref.	Description of Matter	Current Position	Status
EA 3.3.1	Flood Risk Assessment Scope and Methodology	An FRA [AS-004 to AS-006] has been produced in accordance with the National Planning Policy Framework (NPPF) requirements, to support the operational phase of the DCO Proposed Development. The EA also advises that the FRA should be produced in full compliance with the National Policy Statement for Energy (EN-1) and National Policy Statement for Gas Supply Infrastructure and Gas and Oil Pipelines (EN-4) The Applicant notes these have been considered within Chapter 18 [APP-070] of the 2022 ES. The FRA investigates all potential sources of flooding which might affect/be affected by the DCO Proposed Development during the operational phase and discusses the proposed mitigation measures. Any potential flood risk during the construction phase will be managed through the CEMP and FRAPs/Ordinary Watercourse Consents as appropriate. The Draft DCO [AS-016] commits the Applicant to produce an approved CEMP.	Agreed
EA 3.3.2	Flood Risk Activity Permit	The EA advise that any temporary or permanent works within 8m of any main river will be subject to the need for a FRAP under the Environmental Permitting (England and Wales) Regulations 2016. The Applicant confirms that AGIs and BVSs will be located at a minimum distance of 8m from main rivers, with no other permanent works within 8m of fluvial main rivers and flood defences, and 16m of tidal main rivers and flood defences. The Applicant clarifies that the FRA does not assess the construction stage and, where applicable or determined to be required, application for FRAPs will be submitted by the appointed contractor in accordance with the CEMP. Temporary works within 8m of fluvial main rivers and 16m of tidal main rivers will be subject to a FRAP.	Agreed
EA 3.3.3	Surface Water Drainage Strategy Approach and Methodology	A Surface water drainage strategy has been prepared in accordance with the relevant national, regional and local requirements and guidance to demonstrate that the proposed BVS/AGI works will not increase surface water flooding on or off site or have any adverse impacts on existing watercourses and/or networks. The Draft DCO [AS-016] commits the Applicant to produce a detailed Surface Water Drainage Strategy based on the Outline Surface Water Drainage Strategy [APP-241]. The EA have advised that they would expect any surface water outfalls connected to ‘main rivers’ to be for uncontaminated run-off and if this is not the case then an environmental permit / trade effluent consent would be required. The Applicant acknowledges the guidance from the EA.	Agreed

Table 3-4 Issues related to the DCO Proposed Development - WFD Compliance

Ref.	Description of Matter	Current Position	Status
EA 3.4.1	Scope of WFD Assessment	The EA agreed with the water bodies screened in for assessment but requested that Stanney Main Drain is also assessed. Manchester Ship Canal should also be considered for water quality elements due to Ince Marshes being pumped into the canal. It is agreed that smaller watercourses within the wider WFD water bodies will be assessed. Tributaries of the Mersey transitional water body will be assessed using surface water quality elements. The EA agreed that one WFD assessment covering England and Wales would be acceptable.	Agreed
EA 3.4.2	Ecological Enhancement	The EA advises that the completion of nearby WFD mitigation measures that enhance riverine habitats for biodiversity must also be included in ecological enhancement. The Applicant acknowledges the reference to the WFD and riverine habitats for biodiversity.	Under Discussion

Ref.	Description of Matter	Current Position	Status
		<p>The Applicant has not proposed any contribution towards WFD mitigation measures; however, the Applicant has ensured that the DCO Proposed Development would not prevent the achievement of WFD mitigation measures or the legal objective of ‘good ecological potential’ as presented in– Chapter 18.3 – WFD Assessment [APP-165] of the 2022 ES.</p>	
EA 3.4.3	Biodiversity Net Gain (BNG)	<p>There are no priority habitats (in respect of river type within BNG3.1) within England and therefore no Biodiversity Net Gain (BNG) is required for Rivers and Streams in line with the BNG target for the DCO application.</p> <p>The EA acknowledge a BNG Assessment has been included as part of the DCO submission. The EA suggest that efforts should be made to consider BNG, whilst this may not be currently mandatory for the submission stage, as the intention is for construction to potentially start in 2025 (aligning with the intended date for the BNG requirement for NSIPs to be implemented), and it is currently enshrined in wider environmental legislation (Section 1.5 of the supporting BNG Assessment).</p> <p>The EA acknowledge the Applicant’s intention to provide BNG for priority habitats impacted by the DCO Proposed Development. However, the EA disagree that the delivery of BNG should only be limited to priority / terrestrial habitats, where it has been identified that no priority habitats are within England.</p> <p>The EA advise opportunities for BNG are not dismissed for rivers and streams. Therefore, the EA advise this remains under discussion for the time-being to ensure consideration for BNG on ‘Rivers and Streams’ where possible / feasible is considered. The EA advise opportunities to enhance aquatic biodiversity are recognised which could, in turn, aid in enhancing the water environment in line with the objectives of the WFD to contribute to waterbodies achieving ‘Good Ecological Potential / Status’.</p> <p>The Applicant has completed a BNG baseline assessment for all watercourses within the DCO Order Limits and within 10m of the DCO Order Limits using the River Condition Assessment methodology and the BNG metric. The Applicant has provided the river condition for each surveyed watercourse within the baseline information of the DCO application</p> <p>The Applicant’s position is to provide net gain only on priority habitats. No river Priority Habitats were identified within the England section of the DCO application and therefore no net gain is proposed for those watercourses. The Applicant has ensured no net loss along watercourses within the Order Limits and within 10m of them using the BNG Rivers and Streams metric.</p> <p>The Applicant has proposed riparian planting along the East Central Drain near Ince AGI which would reduce the riparian encroachment currently recorded on the watercourse. Other riparian planting is committed to on Friars Park Ditch, Backford Brook and Finchetts Gutter Tributary (D-WR-062 of the REAC [AS-053] which will also reduce riparian encroachment.</p>	For information only and not for agreement

Table 3-5 Issues related to the DCO Proposed Development – Land and Soils

Ref.	Description of Matter	Current Position	Status
EA 3.5.1	Soil and Groundwater Contamination	<p>Risk to controlled waters due to soil and/or groundwater contamination along the length of the Carbon Dioxide Pipeline have been addressed in the Phase 1 Preliminary Baseline Assessment [APP-117 to APP-120] and Phase II Ground Investigation Report [APP-135 to APP-137] as part of the DCO submission.</p> <p>The EA advise that additional work is required to improve the conceptual site model and provide improved characterisation of land quality and risk to 'controlled waters'.</p>	Under Discussion
EA 3.5.2	Management Plans	<p>The EA supports the production of a Dewatering Management Plan and Groundwater Management and Monitoring Plan. This will be managed through the CEMP. The Draft DCO [AS-016] commits the Applicant to produce an approved CEMP.</p>	Agreed
EA 3.5.3	Dewatering	<p>The EA advises that abstraction licenses will be required for any abstractions greater than 20 m³/day unless an exemption applies. These applications will need to be supported by a suitable Water Features Survey and Hydrogeological Risk Assessment detailing the risks that the abstraction poses to dependent water features and how these will be mitigated. The EA advises it is recognised that each abstraction identified will need a Water Features Survey and Hydrogeological Impact Assessment (HIA) which assesses the potential impacts of each abstraction and dependant water features.</p> <p>The Applicant reiterates that Chapter 18 Water Resources and Flood Risk [APP-070] and Appendix 18.2 – Summary of Effect Appendix Rev A [APP-164] of the 2022 ES includes a Hydrogeological Risk Assessment and a desk-based Water Features Survey which details the risks of abstraction and sets out high-level mitigation. The EA advises the high-level Hydrogeological Risk Assessment is not sufficient to assess the impacts of each proposed abstraction along the route.</p> <p>The Dewatering Management Plan and Groundwater Management and Monitoring Plan (referenced in EA 3.5.2) will set out further detailed mitigation as part of the CEMP. The Draft DCO [AS-016] commits the Applicant to produce an approved CEMP.</p> <p>The EA recommends that environmental permits are required under the Environmental Permitting Regulations 2016 for discharges of water from pumping tests and dewatering activities. The Applicant is engaging with the EA to determine the principle and requirement of any additional permits. In the event Perfluoroalkyl and Polyfluoroalkyl Substances (PFAS) contamination is identified this will be highlighted to the EA for discussion in relation to permitting requirements.</p>	Agreed
EA 3.5.4	Groundwater Investigation Consent	<p>The EA advises that if any pumping tests are to be carried out at rates of 20 m³/day or more to determine aquifer properties to inform the Hydrogeological Impact Assessment (HIA), then the Applicant will need to apply for a Groundwater Investigation Consent under the Water Resources Act 1991 prior to carrying out the pumping tests. The Applicant confirms that a Groundwater Investigation Consent will be sought if required.</p>	Agreed
EA 3.5.5	Surface Water Discharge	<p>Any surface water design will take into consideration the location of any existing contamination and how this could impact controlled waters. The EA advises that discharges of surface water from the DCO Proposed Development should be managed in accordance with the guidance provided in the CIRIA SUDS Manual and the EA's groundwater protection position statements. The Applicant is engaging with the EA to determine the principle and requirement of protected provisions.</p>	Under Discussion

Table 3-6 Issues related to the DCO Proposed Development - Ecology

Ref.	Description of Matter	Current Position	Status
EA 3.5.1	Biodiversity Methodology and Assessment	The EA is in agreement with the elements scoped out of the ecological assessment and the assessment of the likely significant effects of the 2022 ES [AS-025].	Agreed
EA 3.5.2	Compensatory Habitat	<p>The EA raise concerns about the waterbody near Stanlow Manufacturing Complex being permanently lost and expect to see full details of adequate compensatory habitat as a result.</p> <p>The waterbody at Stanlow, adjacent to a traveller's site (as discussed during a meeting with the EA on 7th March 2023) was excavated between late 2019 and early 2020 and not created as traditional pond. Irrespective of the waterbody's function, the Applicant confirms that an application for a Great Crested Newt (GCN) District Level Licence will be made to Natural England and the compensation sum discussed with Natural England takes into account the loss of any waterbodies. Under District Level Licensing, the compensatory sum submitted to Natural England is used by Natural England and their conservation partners to create and enhance waterbodies in strategic locations with an emphasis on conservation of GCN but benefitting wider biodiversity including aquatic flora and fauna. New compensatory habitat is delivered by conservation bodies and is maintained and monitored for a minimum of 25 years funded by the compensation payment. Through this approach, appropriate and adequate compensation will be realised for the loss of the single waterbody at Stanlow.</p>	Agreed

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