

House of Commons

High Speed Rail (Crewe - Manchester) Bill

1. Petitioner information

In the box below, give the name and address of each individual, business or organisation submitting the petition.

INOVYN Enterprises Limited, Bankes Lane Office, Bankes Lane, PO Box 9, Runcorn, Cheshire. WA7 4JE

c/o Sarah Beer, Wright Hassall, Olympus House, Olympus Avenue, Leamington Spa, Warwickshire, CV34 6BF whose email address is sarah.beer@wrighthassall.co.uk

In the box below, give a description of the petitioners. For example, “We are the owners/tenants of the addresses above”; “My company has offices at the address above”; “Our organisation represents the interests of...”; “We are the parish council of...”.

1. Your Petitioner, INOVYN Enterprises Limited (IEL), are the owners of Holford Brinefield and Brine Purification Plant on land at Lostock Gralam and extending to the parishes of Cranage, Byley, Rudheath and Lach Dennis (as set out in the Notice to Owners, Lessees and Occupiers served on IEL by HS2 on 27 January 2022).
2. IEL and their rights, interests and/or property are specially directly and injuriously affected by the Bill, to which they object for the reasons, amongst others, set out below.
3. IEL would as a result of the Bill lose part of their land permanently and part on a temporary basis in consequence of the construction of the works authorised by the Bill. The Bill also contains proposals for the acquisition of subsoil in IEL’s land and the acquisition of rights or imposition of restrictions over their land. In addition, IEL’s land is served by their own privately owned network of power cables and pipelines on third party land which will need to be diverted to enable the construction of the Bill works but these diversions have not been adequately provided for in the Bill. Furthermore, IEL’s operations and infrastructure both on and around their land will be adversely affected by construction works and the subsequent operation of the railway.
4. IEL is an INEOS Group company. It is privately owned and is a global manufacturer of products for the chlorvinyls market. Its production network spans 17

- manufacturing facilities in 8 countries throughout the world. The company employs circa 4300 people and has an annual turnover in excess of 3.5 billion euros.
5. IEL's two main sites are at Holford Brinefield and Brine Purification Plant, Lostock Gralam at which 65 people are employed. IEL process 30 million m³ of water and solution mine 4 million tonnes of salt per year to produce raw brine solution.
 6. IEL's brine customers are:
 - (1) INOVYN Chlorvinyls Ltd – they are the sole producer of chlorine in the UK which is used to purify 98% of UK water. They use brine as the raw material to manufacture caustic soda, sulphuric and hydrochloric acid and general purpose and speciality vinyl. A failure to supply brine to their business would result in the cessation of water purification in the UK within 2 days.
 - (2) Tata Chemicals Europe ("Tata") – they are the sole producer of sodium carbonate (soda ash) and sodium bicarbonate in the UK. Glass and food manufacturing industries would be seriously affected if brine was not supplied to Tata.
 - (3) INEOS Enterprises Group Ltd – who produce 50% of the UK's salt for use in the food industry. Failure to supply brine would have a serious effect on the salt plant and its customers across the UK.
 7. IEL's importance as a key supplier of raw materials to industries across Europe, has been highlighted and reinforced by the coronavirus pandemic.
 8. All of the above products have key roles to play in combatting coronavirus and promoting good health. Both the World Health Organisation and UNICEF acknowledge the effectiveness of chlorine in killing coronavirus. Sodium hypochlorite is also effective when used for hospital disinfectants, whilst caustic soda helps make soaps and detergents. Chlorine, methylene chloride, allyl chloride and epichlorohydrin all find key applications in the production of pharmaceuticals, whilst hydrochloric acid and sulphuric acid help to keep water clean and safe.
 9. IEL's brine and water (B&W) operations raise 30 million m³ of water each year from its three main pumping stations and distributes this to its Holford Brinefield and to Tata Chemicals Europe for use in its process of producing sodium carbonate and sodium bicarbonate. Water from IEL's reservoirs and return water from Tata's process is pumped to the 63 brine cavities on the Holford Brinefield to solution mine salt and produce raw brine.
 10. Saturated raw brine (i.e. brine that cannot dissolve any further salt) is pumped to IEL's Brine Purification Plant (BPP) where it is purified by removing calcium and magnesium impurities (known as "brine mud"). The purified brine is distributed to IEL's customers, INOVYN Chlorvinyls Limited, Tata Chemicals Europe and INEOS Enterprises Group Ltd via an extensive network of cross-country mains. The waste brine mud from the purification of brine is pumped to the Holford Brinefield where it is deposited into depleted brine cavities.

11. As part of Tata's manufacturing process, inert waste known as distiller blow off (DBO) is produced which, along with IEL's brine mud is deposited in depleted brine cavities in accordance with the waste licence granted by the Environment Agency.
12. The brine that is purified and distributed to customers must be saturated brine. In order to produce the required volumes of saturated brine and to allow the DBO and brine mud waste to be deposited it is necessary for the business to maintain the correct number of young and mature brine cavities (at "mass balance") as well as the necessary number of waste cavities.
13. To maintain its cavities operational IEL is required to carry out routine adjustments to the position of the tubulars (extraction pipes) within the cavities and to remove and replace them as necessary in the event of failure. This work is undertaken using a typical oilfield workover rig. This rig work requires the mast of the rig to be safely secured using guy lines which must be positioned at a distance of 30m from the cavity heading.
14. Storage of products in depleted or specially developed brine cavities forms a major part of IEL's growing business. IEL currently leases cavities to Cadent, Uniper Ltd and Storengy Ltd for the storage of natural gas. DCO consent has been secured for a third gas storage project, the Keuper Gas Storage Project (KGSP), on IEL's land. The KGSP will create in excess of 450 million standard cubic metres of strategic gas storage for the UK by solution mining a further 19 gas cavities. An amendment of the current consent is being sought to allow the option to store hydrogen to meet the needs of IEL's growing hydrogen business, and to support the UK's future need for hydrogen and the Government's net zero obligations. IEL is also working alongside Cadent and other partners such as HyNet NW to decarbonise the NW region, i.e. involving projects to transport and store low carbon hydrogen and capture, transport and lock away carbon dioxide. IEL is currently exploring further opportunities to use brine cavities for the storage of various materials.

2. Objections to the Bill

In the box below, write your objections to the Bill and why your property or other interests are **directly and specially affected**. Please number each paragraph.

Only objections outlined in this petition can be presented when giving evidence to the Committee. You will not be entitled to be heard by the Committee on new matters not included in your written petition.

1. The Bill proposals, both temporary and permanent, will have a significant impact on IEL's current and future operations and business.

(1) Significant loss of land and minerals on land with minerals planning consent

2. With HS2 Phase 2b in place, IEL will be unable to mine the minerals that are within their consented Springbank Farm site (planning permission dated 21 May 1998) which will extend beneath HS2 and the diverted A556.
3. Five of the twelve cavities planned for Springbank Farm would be directly affected.
4. Under a Data Licence Agreement dated 25 November 2020 between IEL and HS2, IEL has provided a significant amount of data to HS2 on the potential impact that its current and future brinefield operations could have on the settlement and stability of HS2 but to date HS2 have not indicated that there would be any restriction on IEL's operations. As such, until such comment or restriction is received from HS2, IEL will continue to review its brine "mass balance" needs and will progress the development of the Springbank Farm site as it requires.
5. The diversion of the A556 and HS2 on the Springbank Farm Brinefield have the potential to jeopardise development of 5 cavities out of the 12 planned. This would result in the direct loss of 12.5 million tonnes of salt (40 million m3 of brine) and a direct loss to the business running into many tens of millions of pounds.
6. The loss of up to 5 cavities is also likely to result in the proposed Springbank Farm site being financially unviable due to the cost of the required infrastructure being too high for the remaining 7 cavities.
7. The secondary use of the Springbank Farm cavities as waste disposal cavities for DBO after brine winning would also be lost. These cavities would be ideal DBO cavities due to their proximity to the existing DBO infrastructure at IEL's brine purification plant. Using cavities elsewhere for the disposal of DBO would require costly new infrastructure including a booster pumping station to pump the DBO

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| <p>to the cavities, all of which would be costly compared to using the proposed cavities at Springbank Farm.</p> <p>8. If it was not financially viable to develop the remaining seven cavities out of the required 12 at Springbank farm the same number of cavities would need to be developed elsewhere. However, to develop a similar sized brinefield elsewhere would require the acquisition of additional land. Unless such land was available for purchase on the open market at the time it was required, IEL would end up paying a significant premium, running into many millions of pounds for the land/minerals.</p> <p>9. IEL is aware that HS2 has been in discussions with a third party owner of land in the immediate vicinity of IEL's land that already has consent for a gas storage project. It is understood that whilst this project is consented it may no longer be viable due to the impact of HS2 albeit that para. 10.4.47 of the Environmental Statement comments that HS2 will have "negligible impact" on the project. As this land is already consented for brine cavities as part of a gas storage project it would, subject to HS2 not placing any restriction on the ability to solution mine the salt beneath, be ideal replacement land (with minerals) for the land and minerals that are likely to become sterilised on Springbank Farm. It is understood that despite IEL highlighting the suitability of this land to HS2 on a number of occasions it still has not been included with the HS2 safeguarded areas.</p> <p>10. Even though para. 10.4.47 of HS2's Environmental Statement refers to the above consented project as an "extension to the Holford Brinefield", IEL wishes to point out that whilst the land could possibly become an extension of the Holford Brinefield, both the land, minerals and consented project belong to a third party unconnected with IEL in any way.</p> <p>11. As an alternative to the above IEL therefore requires HS2 to acquire other land (with minerals) adjoining IEL's operational land, particularly around its existing, and developing, Hulme Hall site. IEL has identified three other areas of land that IEL consider suitable for its purposes. However, any such land would need to be proven to be suitable for securing planning permission for brine winning and any costs associated with securing planning permission would have to be payable by HS2.</p> <p>12. Developing a brinefield on land unconnected to, or some distance away from, IEL's existing infrastructure would result in a significant increase in the associated infrastructure costs as pipeline and cable routes would be longer and there would be a proportionate increase in the associated operating and maintenance costs. These increased costs would again run into tens of millions of pounds and IEL would require HS2 to make compensation for these additional costs.</p> |
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13. IEL has emphasised to HS2 that acquiring land and transferring it to IEL would prove to be far more cost effective to HS2 than financially compensating IEL for the loss of its land and minerals (and other associated additional costs) at its Springbank Farm Site which run into tens of millions of pounds.
14. IEL understands that HS2 took such a course to safeguard the business and operations of Staffordshire County Showground and Ingestre Golf Club, both of whom had land taken for HS2 Phase 2a.
15. Para. 12.4.25 of HS2's Environmental Statement makes clear reference to the fact that HS2 recognises the importance of businesses displaced by the proposed scheme needing to be relocated to suitable premises and that HS2 will therefore offer additional support over and above statutory requirements to facilitate the process. IEL considers itself to be such a business and that HS2 should offer IEL the promised additional support.
16. In addition to the above, it is understood that under the Bill proposals as they currently stand, a borrow pit is proposed to be established on IEL's land, subject to the required mineral (sand) being present, that would be used as part of IEL's future brinefield. If the borrow pit is established, IEL will expect to receive the required level of royalties for the sand extracted and for any material used to backfill the space created. Any such backfill material deposited must be inert and non-hazardous and must be suitably compacted and brought up to the current ground levels to allow IEL to be able to develop this land as a future brinefield without the need to incur any additional costs over and above that which it would ordinarily incur. IEL will require the backfilling of the borrow pit to allow it to develop its future brinefield and will not accept the borrow pit becoming a water park (or being devoted to some other soil saturating use) which would prevent IEL from exploiting the salt reserves beneath.

(2) Risk of damage to key business critical apparatus from HS2's construction activities

17. IEL's key service corridors are routed under the existing A556 at Wade Brook Viaduct and under the viaduct spanning the IEL site access and Manchester to Chester railway Line. These service corridors all contain numerous live services (and also contain assets belonging to eg Uniper and Storengy), all of which must remain accessible to IEL's operational and maintenance personnel (as well as third parties) throughout the HS2 works. Most of the pipelines in these corridors are laid at a shallow depth and made of fragile and vulnerable ductile iron or cast iron with lead packed spigot and socket joints. These pipelines will be extremely vulnerable to vibration and impact damage.
18. Given the high volume of construction activity that will need to be undertaken in the vicinity of these pipelines IEL have advised HS2 that it should allow for the diversion of these live pipelines in advance of the main construction works. The diverted services could be routed under new viaducts or culverts dedicated to

IEL's services and vehicular access. IEL has already supplied plans to HS2 indicating where it would be willing to reduce the number of pipelines it currently has to minimise the number of diversions required and the size of the viaducts/culverts required. IEL would still require sufficient room in these new service corridors to permit future services to be installed without the need to seek consent from HS2 or Highways England. IEL has indicated to HS2 that it is willing to discuss in more detail the design of the proposed diversions and the viaducts/culverts but such design meetings have yet to take place.

19. Undertaking such diversion works in advance of the main construction works would not only remove the very high operational risk to IEL but would also remove the risk of HS2 damaging a live service which would, in turn, impact greatly on the HS2 works. Such diversion works would also enhance HS2's ability to work safely and efficiently around the diverted services knowing that they are now of robust construction.
20. IEL would point out that whilst the diversion of third party major utilities such as gas pipelines both across third party and IEL's land is currently included within the safeguarded areas, no safeguarding areas have been included to allow for the diversion of IEL assets across third party land along the route of HS2. There are a number of locations along the route of HS2 where the diversion of a number of IEL's water pipelines and high voltage cables will be required either as a result of temporary or permanent works. One particular location where such diversion works will be required is noted in the Environmental Statement (Page 40 & reference to MA02 map CT-06-313 F5 to H5) where the diversion of five underground "potable water" mains is mentioned. However, the extent and route of the diversion of these pipelines, and any other services across third party land, have still to be agreed. No increase in the safeguarding red line boundary has been made to accommodate these inevitable diversions and IEL is concerned that without the compulsory rights that would be attached to these red line areas it could prove time consuming and costly to HS2 to acquire the necessary rights to divert these services, to the prejudice of IEL's operations while these matters are unresolved.
21. Any new vehicular access points to the site or alongside new service corridors must maintain, as a minimum, the current clearances that exist for the current access points. The Wade Brook Viaduct has a clearance of 18m and the Railway viaduct 15m.
22. As already highlighted, the majority of IEL's pipelines that pass beneath the existing A556 are made of ductile or cast iron both of which are particularly vulnerable to vibration, increased loads and ground movement, all of which are likely to occur as a result of the proposed HS2 works.
23. IEL would require HS2 to allow for the diversion of these live pipelines (and other services) in advance of the main construction works to ensure the smooth and

- effective running of their operations. Otherwise protection/mitigation measures must be agreed and put in place beforehand or construction activities kept away from IEL's apparatus.
24. The prior diversion of IEL's pipelines (and other services) will remove the very high operational risk to IEL but would also remove the risk of HS2 damaging a live service which would impact greatly on the HS2 works. Such diversion works would also enhance HS2's ability to work safely and efficiently around the diverted services knowing that they are now of robust construction.
 25. In addition to the above, ground movement from the removal of the exiting A556 embankment and the construction of the diverted A556 and new HS2 embankments is highly likely to have a long-term impact on IEL's existing vulnerable apparatus e.g. cast/ductile iron pipelines.
 26. IEL would again require HS2 to undertake the diversion of these live pipelines (and other services) in advance of the main construction works.
 27. The prior diversion of IEL's pipelines (and other services) using modern, more robust materials such as HPPE (High performance polyethylene) would remove the very high operational risk of a pipeline being fractured as a result of impact, settlement or ground movement.
 28. In any event, ongoing, long-term monitoring of settlement/ground movement would still be required to determine the risk to buried services and the impact on any of IEL's precise level survey points that are in the zone of influence from the HS2 works and HS2 will need to make express provision for this.
 29. The material stockpile shown on plan CT-05-315 is too close to one of IEL's cavities and will prevent rig work to this cavity being undertaken. This material stockpile must be reduced in size to allow the cavity to be worked.
- (3) Impact on and increase in cost of day-to-day operations whilst HS2 construction works are in progress (and see further below)
30. IEL's B&W operations rely on an outside operator who is required to travel between IEL's Holford Brinefield and its Brine Purification Plant to undertake daily routine inspections and to deal with issues that require urgent attention such as safety issues, failure of services etc.
 31. During HS2's enabling and main construction works, because of numerous/various service and road diversions, road closures and the resulting congestion, there is a high risk that the IEL operator will not be able to attend to their routine operations or be able to respond to any emergency within the required timescale.

32. As a result, it is likely that additional resources, based on both the Holford Brinefield (south of HS2 works) and the Brine Purification Plant (north of the HS2 works), will be required in order to ensure that IEL's day-to-day business operations continue to operate safely and effectively.
33. A formal cost recovery mechanism must be put in place to allow IEL's increased costs to be recovered on an ongoing basis without delay. A Data Licence Agreement dated 25 November 2020 is now in place for the design phase of the project which subject to a variation, or written consent from HS2, could also be used as the basis for allowing IEL to recover its costs incurred from the follow-on stages of the project.

(4) Diversion of third-party utility infrastructure/additional IEL costs

34. Several major utilities are now proposed to be diverted through the middle of IEL's operational brinefields. Meetings were held in 2021 with HS2, Cadent and National Grid to discuss the proposed diversion of the various gas mains through the Holford Brinefield and whilst alternative, less disruptive routes were discussed, the routes remain the same as those shown on the 2020 drawings and now included in the Bill proposals. IEL is particularly concerned about the "easement width" areas required for such infrastructure.
35. There will be a need for close cooperation and careful planning between IEL and HS2 in order for the HS2 works to be undertaken without impacting on IEL's operations. The diversion of pipelines etc. will need to be coordinated with IEL's customers to ensure there is no impact on their business operations. This will require IEL to commit a number of its limited resources away from its core business operations and instead dedicate them on a full-time basis to liaising with HS2, its designers and contractors. This will inevitably result in an additional cost burden on IEL for which they will require compensation from HS2.
36. IEL's limited resources are dedicated to its ongoing business operations only, and therefore any requirement to divert resource onto HS2 matters (site investigations, design, preparatory works, construction etc.) will put additional strain on IEL's resources, in terms of both people and costs, which will inevitably impact on its business operations. However, subject to there being an agreement in place that allows IEL to recover all its ongoing costs in dealing with HS2 and subject to the appropriate personnel being available, IEL would be amenable to engaging third parties to deal with HS2 on its behalf.

(5) Site access, service corridors and minimum bridge/viaduct clearances

37. IEL's main site access is privately owned and is routed under the existing A556 adjacent to the Manchester to Chester railway Line. Whilst the access is suitable

for two vehicles along most of its length it is restricted to single track beneath the A556.

38. This access is the main access route for the majority of IEL's own and third-party traffic entering the site and for specific vehicles that, as a requirement of IEL's planning conditions, are prohibited from using other routes onto or off the site. It is essential that this access route is unaffected by the HS2 works and remains open 24 hours a day, 365 days a year.
39. IEL would request that, as part of the HS2 permanent works a new combined access/service corridor is created that would replace and facilitate the existing restricted width of carriageway to become open to two-way traffic beneath the re-aligned A556 and HS2 which would be of benefit to HS2 as well as IEL. This proposal has been put forward by IEL at the high-level design meetings held with HS2 in 2021 but detailed design discussions concerning this have yet to commence.
40. IEL's other main access routes via Lostock Green and Lach Dennis will be subject to congestion and long delays during the proposed works. Any travel delays to any of IEL's access routes between the Holford brinefield and Brine Purification Plant will affect the day-to-day operations and the speed in which the B&W Outside Operator will be able to attend to any pressing operational requirements or emergency situations between the two operational sites (see above).
41. IEL's land at the junction of Crowders Lane and Penny's Lane is a critical plot of land that, due to its existing service corridor in Lach Dennis being congested, will become the main service corridor linking IEL's land to the North and South. There is likely to be an increase in costs associated with laying future services in the highway, as opposed to through farmland.
42. The bridge over Wade Brook on Robin Hood Lane (shown on plan CT-05-315) to be used to gain access to the Satellite construction compound and material stockpile from Birches lane is, due to its condition, only suitable for use by pedestrians. IEL has informed HS2 on many occasions that this bridge is in poor condition and is not suitable for use. It is currently physically restricted to pedestrian use only due to its condition. The existing bridge must be improved and made structurally safe for vehicles, or alternatively a new permanent bridge (and track) must be built alongside.

(6) Loss of farmland/compensation payments to IEL's tenants affected

43. The HS2 works will result in productive farmland that is currently rented to IEL's tenants being taken as "temporary take" during the construction phase and as "permanent take" once the construction phase shrinks back to the permanent works.

44. IEL or its tenants will require satisfactory restoration of the farmland affected and compensation for the loss of crop that will result from the loss of the farmland during HS2's period of occupation. IEL will require the crop compensation rates to be no less than, but also no more than IEL rates to avoid creating a precedent that will impact on IEL's own need to pay crop compensation to its tenants when it undertakes construction activities on its own land.
45. Where compensation payments are due, they shall be agreed promptly and paid without delay to avoid tenant hardship. IEL will require any compensation payments that are to be made to be in line with its own compensation rates to ensure that HS2 do not set a precedent and future cost burden for IEL by offering higher crop compensation rates than it ordinarily pays to its tenant farmers.
46. It should be noted that due to the relatively small size of some of the IEL tenancies (when compared to modern farming practices) any significant permanent land take could impact on the overall viability of the tenants' farming operations.
47. As part of any compensation it will be necessary to consider whether any tenanted land that is outside of the HS2 safeguarded areas or permanent works will be temporarily or permanently severed. Severed land with no means of access will need to be included in the land compensation package. Severed land with alternative access will suffer an increase in the cost of farming as a result of increased travel/movement costs and general farming inefficiencies. This additional cost will require ongoing compensation by HS2.

(7) Loss of value of Melvyn Holme Farm, Springbank Farm and Fieldhouse Farm

48. The HS2 works are in very close proximity to Melvyn Holme Farm, Springbank Farm and Fieldhouse Farm, all of which are IEL owned properties that are rented to long term tenants. It is highly likely that the value of these properties, both in terms of rental and capital value, will be detrimentally affected by the HS2 construction works and the subsequent operation of HS2. There will also be ongoing long term detrimental visual and noise impacts to these properties. The quantum for these detrimental impacts will need to be assessed and appropriate compensation made for the losses in value.

(8) Additional impact of provision of additional wildlife habitat to ongoing B&W operations

49. Whilst there is no significant loss of existing habitat (woodland, wetland, ponds etc.) on IEL land as a result of the HS2 works, HS2 have included a large amount of new habitat to be created on IEL's land.
50. Due to the nature of IEL's operations, the creation of such habitat will have a negative impact on IEL's ability to conduct its normal day-to-day operations and project activities. HS2 will need to compensate IEL for the increased

environmental burden and consequential increase in costs that will be incurred as a result of IEL having to undertake additional environmental studies and environmental mitigation works. Also, no trees or shrubs can be planted over, in the vicinity of, IEL's apparatus. IEL's tree planting restrictions must be taken into account by HS2.

(9) Loss of IEL Precise Levelling points and severance of line-of-sight

51. The proposed HS2 works will result in the loss of IEL precise levelling points and the severance of line-of-sight to a "Benchmark" reference point (Deep Level Point) that is located on IEL's Springbank Farm site.
52. Replacement level points and deep level point will need to be established on the south side of HS2 prior to works commencing.
53. As a requirement of its planning permission and operating licence, IEL is required to maintain and survey its precise level survey points every 5 years. Any survey points lost are required to be replaced. New level point(s) will need to be established with clear line of site to replace those lost.
54. IEL requires that the cost of replacing the survey points and any increase in the ongoing costs to undertake the surveys as a result of HS2 shall be borne by HS2.

(10) Land drainage: New drainage and the effect on existing drainage

55. Potential impact of damage to existing drains and subsequent longer-term effects that may only become apparent some years down the line.
56. Pre- and post- construction drainage will need to be installed by HS2 in order to intercept any existing land drains and to properly drain the works and IEL's surrounding land and to allow IEL's drains to function properly.
57. An existing main culverted drain runs from IEL's Birches Lane site under existing A556 and the proposed HS2 and diverted A556. This is a key drainage route for a large area of IEL's land and which IEL's operations rely upon, this key drain must always remain fully functional.
58. Adequate containment of silt and contaminants from the works must be put in place to prevent silting up of the drainage system and pollution of the watercourse and land.
59. Long term monitoring of the adequacy and functionality of all drainage systems will be required to ensure that there is no impact on IEL's land in terms of flooding, loss of crop etc. Any issues noted will need to be physically addressed and where necessary compensation payments made to those affected.

(11) Interference from HS2 radio communications system/electromagnetic fields

60. IEL's production facility relies on some radio-controlled equipment to control its operations. IEL will require confirmation that none of HS2 Radio Communications systems or Electromagnetic fields will adversely impact on IEL's equipment.

(12) Impact on re-purposing of existing cavities and creation of potential new cavities

61. IEL formerly operated two ethylene storage cavities on behalf of Sabic who have now removed their ethylene from them, leaving IEL free to re-purpose them, make use of up to 5 neighbouring "cordon sanitaire" cavities and drill new cavities in the area that was previously declared a safety zone ("cordon sanitaire"). IEL requires clarification from HS2 whether they are restricted from undertaking these activities in proximity to HS2. If IEL are to be restricted then they will require compensation for the loss of minerals etc. or suitable alternative land acquired for that purpose by HS2 for IEL's use.

Conclusion/Summary

62. IEL's key issues are:

- (1) Significant loss of land and minerals on land with minerals planning consent and need for compensatory land provision;
- (2) Risk of damage to key business critical apparatus and third-party assets from HS2's major construction activities (both temporary and permanent works);
- (3) The need for IEL's pipelines (and other services) to be diverted as part of enabling works, using modern, more robust materials such as HPPE to avoid pipeline fractures during HS2 works;
- (4) The need for the safeguarding area to allow for the diversion of IEL assets across third party land (water pipelines and high voltage cables) along the route of HS2;
- (5) Impact on and increase in cost of day-to-day operations whilst HS2 construction works are in progress;
- (6) The need to recover IEL's costs in dealing with site investigation, design and construction activities associated with HS2;
- (7) Insufficient consideration given in HS2's current design to IEL's need to maintain, repair, renew and install new apparatus and for sufficient access beneath HS2 and the diverted A556;
- (8) Diversion of hazardous third-party pipelines further onto IEL's land with the resulting restrictions that would apply to IEL's operations;
- (9) Road closures and diversions during HS2 construction works leading to need to engage additional resource to safely operate IEL's assets;

(10). The bridge over Wade Brook on Robin Hood Lane (shown on plan CT-05-315) must be either improved and made structurally safe for vehicles, or replaced with a new permanent bridge (and track) alongside;

(11) Loss of farmland, compensation payments to IEL's tenants affected and the satisfactory restoration of the land;

(12) Loss of value to IEL's farm properties in the vicinity of HS2 and the diverted A556, and loss of income to IEL in the event that one or more tenants decide the farm(s) is/are no longer viable, particularly if those farms cannot then be re-let;

(13) Creation of new habitat on IEL land or assets that will directly impact on IEL's ability to undertake work on its assets and will increase IEL's costs;

(14) Additional points as set out above.

3. What do you want to be done in response?

In the box below, tell us what you think should be done in response to your objections to the Bill. You do not have to complete this box if you do not want to.

You can include this information in your response to the section 'Objections to the Bill' if you prefer. Please number each paragraph.

1. IEL has included the information as to its requests and requirements in section 2 "objections to the Bill" above.
2. IEL submits that for the above and connected reasons the Bill so far as affecting IEL and their interests should not be allowed to pass into law unless all their requests and requirements are met.
3. In particular, although without diminishing the importance they attach to their other requests and requirements, IEL contends that if any of their land is to be acquired and/or IEL is prevented from exploiting any of its minerals beneath its land or from making use of any of its cavities for any purpose, then HS2 should be required to provide compensatory land to safeguard the continued operation of IEL's business and that HS2 should fully compensate and indemnify IEL for the additional costs incurred as a result of engaging with HS2 over the Bill proposals and in respect of additional expenses which IEL would not otherwise have had to incur if the Bill had not been passed into law.