Planning Inspectorate Reference No: EN030001

Registration No: [XXXXX].

**Re Preesall Underground Gas Storage Plans**

Dear Sir,

The Ribble Fisheries Consultative Association represents the riparian owners, angling clubs and fishery interests within the Ribble Catchment. In so doing we work closely with other Consultatives throughout the North West and with the numerous Rivers Trusts which work tirelessly to protect, preserve and enhance fisheries and the habitats that they are dependent upon.

We have over many years objected to the plans submitted by Canatxx and more recently by Halite as we have grave concerns about the proposals and the discharge of saturated saline solution into the very important areas of the Irish Sea that are the life support systems that many species depend upon. It is our view that when such proposals are made they must, at the very least, contain appropriate research and safeguards for the environment.

We are not against progress and will work constructively with developers but will work fiercely to ensure that the environment and our fishery interests are not put in jeopardy by such developments. It is imperative that such developments are undertaken only with due consideration of the ecology of the areas and how it interacts with surrounding eco-systems and the migrations of significant species such as the salmon and sea trout.

To this end we recently had a meeting with Halite to discuss our concerns only to discover that there was little or no research being done on the impact of the salt discharge nor, indeed, on the consequences of such a discharge into a very sensitive area of the sea. One reason for writing this letter was the apparent lack of understanding within the Halite employees of the value or the needs of our sustainable fisheries.

It came as a surprise to the Halite Executives that the salmon and sea trout are amongst the top ten most endangered species and protected under the Habitat Initiative 2000. Also, that the N.W. rivers are in the top five in England and Wales. It is through the very substantial investment and joint working with all interested groups that this situation has been brought about as only a few years ago there were dire warnings from the E.A. and swinging restrictions placed on fisheries to protect and promote these species.

We are therefore, very concerned about the lack of understanding and appreciation that is currently being shown by Halite. We are aware that the E.A. is being put in an invidious position by the requirements of DECC and DEFRA and the conflicting requirements of the Water Framework Directive, and their statutory responsibilities to maintain, improve and develop fisheries within their area.
We have very grave concerns that DECC and DEFRA are the only ones that are being listened to, leading to an imbalance between the competing interests of energy strategy and protection of the natural environment. In the case of the Canataxx proposals for brine discharge, this is resulting in a situation where irrevocable damage will be done to both fisheries interests and the wider environment as a whole. Currently, there is no provision built into the scheme that could close it down if damage started to occur. This is not sensible - not a precautionary approach - when dealing with the environment and its inter-related eco systems. This conflict of interest for the E.A. means, in our view, they are being compromised in their statutory obligations and therefore cannot be relied upon to protect the environment and in particular - fisheries, be they sea fisheries, shell fisheries or the migration of salmonids.

The value of the Ribble Fisheries alone runs to many millions annually and the riparian owners have a right to expect the E.A. to look after their interests along with the interests of the thousands who contribute annually through their fishing licences and permits. I pose but one question here - If it goes wrong because it is based on bad research who will be held to account to pay the compensation and who will restore our heritage once it is damaged or even lost?

In our recent meeting with Halite Executives it was stated that “Halite does a lot to mitigate against their works” - and that they “always replant or landscape”. Whilst we accepted this, it was pointed out that what we are concerned about was not open to being landscaped but irrevocable damage to the environment and ecological systems with the Irish Sea - not just Morecambe Bay. To this they had no answer whatsoever. This does not fill us with confidence about the competence of those who have supplied information to support the proposal nor that they are aware of the complexity of the environment and its eco-systems.

At the original enquiry our Association was represented by the late Dr. R. Broughton who, with a range of professional and scientific colleagues throughout the region, worked on authenticating the model used to determine the dispersion of the heated brine and so determine the likely impact upon the ecology of the sea. The eminent experts indicated that there were a number of factors that were worthy of serious consideration in examining this question. It was, and still is, thought that the E.A. should be undertaking studies to determine the precise dispersal of the proposed brine discharge using actual measurements under the complete range of the tides, temperature and wind conditions throughout the year. There should also be detailed studies undertaken as to the safety and sustainability of planktons, sea creatures and fish within the dispersal area. It is not acceptable for the E.E.A. - the guardians of the environment - to sit on the fence on this one; they either fight for the security of the environment or they cave in to the expediency of the “fast win” in the knowledge they will not have ultimate control over the situation once it has been approved.

Although the original inspector gave considerable credence to the submissions of Dr Broughton, the E.A. didn’t then, and haven’t done since, any work to further understand the full impact or consider the contributory factors as indicated by Dr Broughton. Furthermore, there have been substantial alterations within the vicinity of the discharge that will cause alterations to the previous model - these too have not been fully explored.

Should any of this data prove to be misinformed and damage occur, then the damage done to marine life in the immediate area and its subsequent dispersal around Morecambe Bay - as occurs with the neighbouring sewage discharge - then the whole basis of the project will be a catastrophe. It is our view that this is why the whole question of discharge and its dispersal around the Bay, under the myriad of conditions that can appertain, should as a matter of urgency, be seriously addressed before any permission is finalised.
It is also probable that the changes to the sea defences at Blackpool will have an impact upon the dispersal of the brine, which, as it is heated at the point of discharge, will, under the basic laws of physics, change as it cools and therefore itself change the pattern of dispersal. As none of these considerations have been researched the precautionary principle is not being followed - more a case of we will do it and be damned. Such an approach is totally unacceptable when dealing with the complexities of nature in an area that is supposed to be protected by the range of environmental and habitat legislation that the Government has signed up to over the past decade.
We were astounded when we were informed that Halite had not undertaken a COMAH (Control of Major Accident Hazards Regulations 1995) Assessment - one was drafted but cannot be binding as details planning still had to be done. Equally, when asked about other safety regulations (Manufacture & Storage Regs.2005) their answers were less than convincing.

Given this lack of due regard to safety regulations and consideration of consequences elsewhere in the world we question whether the whole project is being sufficiently carefully considered. This is compounded by the fact that we were informed that Halite may not be the operator of the gas storage facility as they are a pipeline company. Where then does that put the safety and ecological considerations in the minds of the company constructing the caverns - it may explain why they show scant regard for many of our concerns as they feel it won’t be their problem. Similarly, this information throws into doubt how any operator can be bound by the decisions needed to safeguard the environment and our fishery interests.

A similar response was engendered by our questions on the proximity of the fracking shale gas extraction, especially bearing in mind that it had to be closed down last year due to serious earth movements. They were unable to give any assurances as to the security of the caverns - given that a well head burst open last year - and that fracking has now resumed and will come to within 3Km of the proposed storage site. Again no specific plans were in place should the worst case scenario happen - why not? This is pure negligence; imagine the outcry in a worse case scenario.

There remain a number of very serious concerns that direct discussions with Halite have failed to satisfy, indeed these discussions have merely served to reinforce our belief that, as yet, there has been insufficient research undertaken and as a consequence Halite Executives remain unconvincing in their responses to our questions. Furthermore, we feel very strongly, like many of our associated organisations, that there are insufficient safeguards built into the proposal, the modelling used together with its data is open to question, insufficient monitoring with clear criteria for shut down in the event of a problem has not been identified and there are specific safety issues that haven’t been addressed in the light of experience around the world.

**We therefore urge the IPC to insist that the discharge modelling needs to be revisited together and the security and safeguarding issues fully addressed before any decision is made.**

Yours sincerely,

John Whitham,
RFCA Secretary