Mr Paul Hudson  
National Infrastructure Directorate  
The Planning Inspectorate  
Temple Quay House  
Temple Quay  
Bristol  
BS1 6PN  

4th June 2012  

Dear Mr Hudson  

Application for an Underground Natural Gas Storage Facility - The Wyre Estuary  
Planning Inspectorate Reference Number: EN030001  
Personal Reference [XXXXX]  

Summary  
This letter of objection sets out to show that the proposed scheme is unnecessary and in an unsuitable location. It highlights the proximity of the scheme to a large number of residents living in a rural area on one side and on a peninsula on the other, the risks of gas migration to the residents in these areas and the impossible task of evacuation should the need arise, the uncertainties of the proposed volume of stored gas and the lack of investigation, the actual need for the project and the number of jobs it purports to create.  
It also asks the Inspectorate to advance discussions with the emergency services to solicit a response and a view to ascertain how a major loss of containment would be handled prior to any development consent being granted.  

Yours sincerely  

Ian Mulroy
Proximity to the Urban Population

Behind all the facts and figures, the PR posturing, the glossy brochures, the slick websites, the claims of jobs and benefits to the Wyre area there is another story and that is about the fear of the risk of gas escape and explosion that this proposed scheme offers to the residents who will have to live and work adjacent the site.

The word ‘adjacent’ needs to be defined because in this case ‘adjacent’ I suggest can be considered as anywhere within 3 miles and probably a bit further from the proposed site.

Three miles has become something of an unofficial yardstick in terms of underground gas storage (UGS) as this appears to be the norm for the evacuation radius of residents when gas escapes have occurred in other parts of the world, primarily the USA.

There is documented proof from the Hutchinson, Kansas gas escape in January 2001 that pressurised gas from an underground storage facility can travel up to seven or eight miles as it makes its way to the surface. The cross section of the Hutchinson shale is not dissimilar to the cross section of the layered salt in Preesall and this evidence was presented in detail to the Public Inquiry in 2006.

One of the major differences between Hutchinson and Wyre is that the storage facility was 7 miles northwest of Hutchinson, population 40,000, and the escaped gas migrated from the storage facility to the town where explosions, fires and fatalities occurred. Here in Wyre the proposed site would be only 1,000 metres from the nearest homes and about 80,000 people live within a three mile radius.

The developer, Canatxx (now Halite Energy - the same company) dismissed the likelihood of such an event happening here but in Kansas the State Legislature took the matter much more seriously and introduced laws to lessen the risks of such an occurrence happening again.

The Kansas laws now state that underground gas storage facilities must not be created within 1 mile of any well or aquifer, within 3 miles of a municipal settlement and within 5 miles of any mine working. The proposed site in Wyre would fail on all three
of these criteria if they were imposed here in the UK.
Evacuation of the Area

I ask the Inspectorate to consider the logistics of any evacuations that might be necessary if a gas migration was to take place from this proposed installation. The sheer numbers of residents involved and the location of so many people on a peninsula makes any thoughts of evacuation a non-starter in my opinion.

Evidence has been submitted by the Protect Wyre Group which highlights the added dangers to residents on the Fleetwood Peninsula and to the residents of Blackpool and those living along the northern section of Fylde Coast by the presence of the Fylde Coast Interceptor Tunnel which runs from Fleetwood into the heart of Blackpool - a figure of 426,000 residents is suggested by the Tunnel’s owners, United Utilities (UU).

United Utilities have asked for assurances from Halite that their assets and customers would be protected if this scheme was to go ahead. It is unlikely that such an assurance could be offered without geological test data being obtained from boreholes in the ground between the proposed scheme and UU’s installations. There is no evidence that these tests have been undertaken.

There are also known fault lines and an area of wet rockhead running in an easterly direction from the proposed site and one of these runs up to Preesall village which as well as having residents has two schools. Fleetwood’s Charity School has about 100 pupils and St Aidan’s College of Technology has over 800 pupils both of which are situated within a few hundred metres of the fault lines.

The threat of gas migration to these schools should, I suggest, be a significant factor in the examination of this scheme. The residents of the villages of Preesall, Knott End and Stalmine are equally at as much risk as the school children.

The combination of all these factors, I suggest, demonstrates that this is the wrong scheme in the wrong place irrespective of the properties of the salt or of any claims of the scheme being in the national interest with the need for gas storage.
Fire and Safety Considerations

I have grave concerns that the safety issues surrounding this application are woefully inadequate for what would become a top tier major hazard site if planning approval was to be recommended and granted.

I do not find any comfort in the knowledge that the scheme will be subject to COMAH and HSE regulations as and when the project is ready to be commissioned. Whilst this might be a true statement of fact it isn’t a panacea for the prevention of accidents and the size and location of this proposed scheme significantly raises the risk factor. COMAH and HSE regulations were unable to prevent the accidents at Flixborough and Buncefield and much nearer to home residents still have the memory of the accidental explosion and subsequent fatalities at Abbeystead.

The dictionary describes an ‘accident’ as “an unfortunate incident that happens unexpectedly and unintentionally, typically resulting in damage or injury” and whilst I expect Halite would do everything in its power to prevent the loss of any of its stored product no-one can say without any shadow of doubt that an accident cannot happen.

Accepting therefore that accidents can and do happen, it would fall to the Fire Service to be first on scene to deal with the matter. I have spoken at length to members of the Fire Service and my understanding is that they are not required to formulate a detailed emergency plan until a proposed planning application becomes a ‘live’ project.

I am therefore asking the Inspectorate to use its powers to advance a discussion to seek an opinion from the Fire Service as to how they would handle a gas escape or explosion from this location and to ascertain how they would attempt to control a gas migration or mitigate the loss of containment of the gas. Additionally I would ask the Inspectorate to consider the potential for gas to enter the United Utilities Fylde Coast Tunnel and/or Waste Water Treatment Works at Fleetwood which significantly expands the risk and the area of operation from the site of the proposed well heads at Preesall to the northern half of the Fylde Coast.
It’s also my understanding that ‘given this as a hypothetical situation’ the Fire Service would not place its fire-fighters or appliances at risk by asking them to enter an area to address a gas escape/fire where further gas migrations could cut off their own escape routes. Similarly I suggest that the public would not expect members of the other emergency services to enter these areas either.

Dr Roberts, Chairman of Halite Energy, has stated that there has never been a gas escape or migration from any UK installation, which whilst denying the fact that gas has escaped, migrated and caused explosions from installations in the US it is a true statement, but this also confirms by default that the UK fire service has had no practical experience anywhere in this country of dealing with the eventualities that could happen should a gas escape of similar magnitude occur. I am also mindful that this scheme is being proposed immediately adjacent to a heavily populated area which differentiates it from other schemes elsewhere in the UK.

It might also be prudent as part of the examination of the application to ascertain the stances of the other agencies to ensure that if planning permission was to be granted that these agencies could comply with the terms of COMAH before any development consent is granted.

National Need for this Specific Scheme

If this proposed scheme was proven to be in the ‘national need’, a term which has been bandied about for the last 10 years or so, then maybe residents would adopt a softer stance towards it but this has never been proven to be the case.

Canatxx initially stated that their scheme would facilitate 5 billion cubic metres (bcm) of gas to be stored, this was then reduced to 3 bcm, and then further reduced to 1.4 bcm and we now have a scheme for 0.9bcm which is supposed to represent a 20% increase in the UK’s gas storage capacity.

The tables produced in the Gas Transportation Ten Year Statement 2011 show that there are already schemes which have been granted planning approval in the UK which would provide the nation with 11.1 bcm of gas storage and the report notes that these schemes simply require financial initiatives to come to fruition.
The same report shows that, excluding Halite’s Preesall scheme, a further 7.4 bcm could be made available bringing the total to 18.5 bcm which when added to the existing storage capacity exceeds the government’s target and thus, I suggest, renders Halite Energy’s scheme surplus to requirements.

Following this hypothesis, it has to be said that Halite’s scheme offers marginal benefits in a marginal location; a marginal location where only a small amount of actual geological investigation has been conducted. It isn’t disputed that significant amounts of desk studies have taken place and that the interpretation of existing data has been undertaken but the fact remains that in spite of the recommendations of the Inspector and the Assessor at the Public Inquiry, there are still only four test bores across the site.

The older the data becomes the less relevant it is to today’s scheme - if there was insufficient information to allow the previous schemes to achieve planning approval then I suggest that the reinterpretation of old data is not the way forward - it requires new borehole data and this has not been provided by Halite.

The questions have to be asked that if Canatxx thought it could store 5 bcm of gas in the Preesall salt with their first application then why it didn’t undertake the necessary investigations to prove this.

Why also, when the volume was reduced to 3 bcm, wasn’t a full investigation undertaken to prove this revised amount? The same question applies to their third application and again to this current application.

Canatxx and now Halite has had, by its own admission, about 18 years in which to prove the suitability of the Preesall salt for the storage of natural gas but appear to be reluctant to undertake a full physical site survey despite the recommendations of the Planning Inspector and his Assessor at the Public Inquiry.

In this latest planning application, Halite introduces a new area for the creation of caverns to the north of the site; an area which has not been included in any of the three previous applications and an area where little or no physical geological
investigations have been undertaken. This begs the question that if this new area is so suitable for gas storage then why wasn’t it included in previous applications.

**Job Creation**

So far we have seen exaggerated, unproven and varied claims of the amount of gas that could be stored in the Preesall salt and claims of its importance to the national need. There is now a new element claimed to be in support of the scheme, namely massive job creation opportunities.

Recently a report by Regeneris Consulting stated with reference to the Halite scheme: - “At its peak over 3,000 jobs would be created directly and indirectly across the UK as a whole, with an average of 1,200 jobs per annum generated in the UK during the eight-year construction phase.”

Halite has seized on this report as an endorsement of its proposed scheme but only recently Halite was stating: - “The construction of the Project will provide 200-300 jobs and there will be an economic benefit from this in the local area. Up to 45 jobs will be created once the facility is operational.”

One has to question how Regeneris can extrapolate a 10 fold increase in jobs - something that I would have expected Halite to have known about and promoted as part of extolling the benefits this scheme over the past 10 years that is if such benefits actually exist.

**Conclusion**

For years there was a misconception that this scheme would be located in the lesser populated rural areas of Wyre, i.e. Preesall, but reality shows that the actual caverns would be located closer to the urban areas of Fleetwood and Thornton and that infrastructure on the west bank of the River Wyre introduces a threat to the residents of Blackpool and the Fylde Coast, some 426,000 people.

A partial or mass evacuation of the area would be impossible due to the huge number of residents involved and the area over which the risk might spread.
COMAH and HSE regulations will ensure that any construction and installation would be as safe as possible but they are not a panacea to guard against an accidental escape of gas occurring.

The Assessor at the Public Inquiry, who was highly qualified and independent, disputed the developer’s claims on the amount of gas that could be stored in the Preesall salt and downplayed this to about 25% of their stated volume. This evidence supports the view that this is a marginal scheme in a marginal salt lens.

The Gas Transportation 10 Year figures show beyond doubt that this scheme is not needed to meet government targets and the scheme won’t, as Halite claims, offer a 20% increase in the nation’s storage.

The ‘new’ jobs benefit has yet to be proven and even taking this into consideration, the Halite scheme is not primarily a job creation scheme and the ‘new jobs’ potential is a ‘nice to have’ rather than a reason to approve the proposed scheme.

Despite all the publicity and assurances it is clear that the residents of Wyre do not want this scheme on their doorsteps. The previous three applications have solicited an average of 10,000 written objections each and this fourth one has attracted over 10,850 through the Protect Wyre Group which is a significant opposition to support the rejection of Halite’s proposals.

The Inspectorate will be only too well aware of Human Rights legislation and the Serveso II agreement which basically says that people have the right to live without fear to themselves and/or their property.

There have been 10 years of fear and uncertainty and the residents of Wyre want to see an end to these proposals once and for all.