Dear Mr Hudson,

The Hazardous Installations Directorate Branch of the Health and Safety Executive includes Emergency Response Arrangements within the Safety Report Assessment Manual. The Technical Measures Document provides additional detail that should then be considered in plant design and operational procedures. (Reference HSE document HID CD2)

Knott End Golf Club have considered the content both of the defined legislation and its advisory inclusion and concludes that the Halite proposal falls far short of the advice contained therein and also far short of that of many examples of best practice as provided at a number of other Top Tier Major Hazard Sites. To assist us in this field we have been able to call upon a team of golf club members with personal experience in this field,

Three key elements cause particular concern to us, namely Security, Fire Management, and Planning for Emergencies

Security
All Top Tier Major Hazard Sites familiar to our team of playing members have without exception enclosed their Sites with security fencing. Access into the area is always controlled, enabling the Site Security team to have immediate knowledge of who, and how many persons are in the area at any one time, such that a meaningful emergency response can follow in the event of an unexpected emergency.

Knott End Golf Club are entitled to have explained whether Halite intend to follow this best practice or alternatively intend to operate only a low standard security provision by fencing well heads only and without adequate control at the boundary between the golf course and the Halite boundary and along the public Wyre Way.
Fire Management
Again, all of the Sites familiar to our team, and involving operations using and storing Highly Flammable materials, include the best standard fire fighting resource of high pressure water distribution mains. The purpose is not solely that of extinguishment of fire but importantly to provide an automated immediate cooling facility to adjacent ‘at risk’ plant and also to provide protection to personnel caught up in the incident, and who could be innocent golfers or members of the public.

We understand that Halite have not included this provision within the planning application and appear to prefer only a low standard less expensive facility relying upon the County Fire and Rescue Service who would attend some 15 minutes or so after the emergency has struck. At this point a Risk Assessment would decide whether the team may put itself at risk by entering the scene or whether it would be preferable from a safety standpoint to raise water curtains at a suitable separation position.

Planning for emergencies
We have learned from our enquiries that when preparing an emergency plan, the Operators (Halite) are obliged to include suitable facilities to enable safe access for HGV emergency response vehicles to enter the site. Further it is the experience of our team that the best sites would always ensure that a secondary alternative route is available and well separated from the primary route for use should one become untenable for any reason.

Building Regulations define the standard of construction of roads suitable for HGV access and since such construction may be across part of the golf course land, it is important that Halite declare their intention such that its likely effects upon our course and the aesthetic implications can be considered.

Finally, having studied the Halite drawing reference A-9000-003 we can ascertain that a separation distance between the most northerly proposed well head and number 5 and number 7 greens to be no more than 100 yards. Moving the Wellhead further south is not an option since that would enter into the Sewage works area. We have learned that at the Canatxx Public Enquiry into a previous Planning Application, ‘Hyder Consulting’ working on behalf of the applicant quoted that in the event of a gas release and ignition to produce a jet flame a separation distance of 250 metres would cause danger to humans and that a radius of 100 metres would experience the risk of spontaneous ignition. The Knott End Golf Club will strenuously oppose any application to build well heads in close proximity to our golf course with its attendant risk to our player members, green keeping staff and visitors.

Knott End Golf Club has carried out a risk assessment and in addition to the elements expressed in this letter, we have serious concerns regarding Crown Hole subsidence.

There are six proposed caverns that are situated under land owned by the Club. We understand that in the previous public enquiry no evidence was put forward that the caverns would be beneath Knott End Golf Club land. Subsequently we have had sight of Crown Hole subsidence which has occurred near Height O’the Hill farm and at Eagleby's at Westfield. Further to this our concern is that in the event of any caverns partially collapsing the Golf Club would sustain considerable damage which would put the viability of our business at serious risk.
We trust that you understand the growing concerns we have and that you will address the issues mentioned in this letter in the hope that our concerns and questions will be given the appropriate attention and response.

Your continued support for our long term survival is much appreciated.

Yours Sincerely

[Redacted]
The Board of Directors
Knott End Golf Club Ltd.