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

3rd July 2012  

Dear Mr Hudson  

Protect Wyre Group Evidence - Underground Gas Storage Facility at Preesall Saltfield  
Planning Inspectorate Number: EN030001  
PWG Reference Number: [Redacted]  

Please find enclosed a report from the Protect Wyre Group which comments upon the question raised by the Planning Inspectorate and the answers given to those questions by Halite Energy.  

The Group also comments on outstanding issues with Halite, primarily on geology, and upon their corporate structure plus upon the evidence submitted from other Interested Parties.  

The Group has a particular concern with the absence of any response from United Utilities and in this report we ask the Inspectorate to investigate this matter further.  

Yours sincerely  

Ian Mulroy
EVIDENCE FROM

THE PROTECT WYRE GROUP

REFERENCE NUMBER:  

APPLICATION FOR AN UNDERGROUND NATURAL GAS STORAGE FACILITY

UNDER THE WYRE ESTUARY BY HALITE ENERGY GROUP

PLANNING INSPECTORATE REFERENCE NUMBER: EN030001
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PWG Reply to HEG response to “PWG Evidence - Draft Document” on the Geology

The Protect Wyre Group (PWG) submitted a document to Halite Energy Group (HEG) on 7th April 2012 entitled “PWG Evidence - Draft Document” with the intention of soliciting detailed answers from HEG to the Group’s queries on the geology to either establish areas of common ground or to define areas upon which agreement could not be reached. It was hoped that the Group would have obtained a more detailed response to its questions before submitting its report to the Planning Inspectorate on June 6th.

The questions in PWG’s document could not be addressed immediately as HEG’s resources were deployed in answering the questions put to it by the Planning Inspectors and it is accepted that they took precedence. PWG’s document was passed to Mott MacDonald for evaluation and written response, in due course, but too late for the June 6th deadline.

PWG submitted an amended version of this “Draft Document on Geology” to the Inspectorate as part of detailed objection.

This document lists the outstanding issues with page and paragraph references to Mott MacDonald’s response on behalf of HEG which they have already submitted to the Inspectorate together with a copy of PWG’s Draft Document.

MMD states in para 6 on page 1:- *This document (i.e. HEG’s) provides initial comments on the draft Evidence prepared by the PWG, but does not intend to provide an in depth assessment of that evidence. This document then provides answers to the seven specific questions posed by the PWG.*

It is noted that the response from HEG provides initial comments on the PWG Draft Evidence but it is not an in depth assessment of that evidence. Indeed PWG considers that whilst the HEG
response deals in detail with some of the issues raised by PWG, many other issues are not addressed at all.
1. Page 2, para 4 MMD states: **In the case of Preesall, the amount of data available to the project in the form of borehole data, data from existing caverns and seismic data is far in excess of most similar projects.**

1.1 The amount of data available in order to construct the 3-D Model may be “far in excess of most, similar projects”. It does not follow that the data is sufficient given the complexity of the geological structure, the shallow depth at which the halite bed lies, the proximity of the old brine wells and mine, and the fact that 80,000 people live within 3 miles of the site.

1.2 The Report of the Inspector following the Public Inquiry into the Canatxx application states that “overall, the information provided by the applicant is neither sufficient nor sufficiently detailed to support the proposals”. The PWG view is that the data from the two additional bore holes do not go far enough to satisfy the requirements as set out by the Geological Assessor at the Inquiry.
2. Page 2, para 4 MMD states:- *We believe there are no significant differences between the BGS model and that presented within the Geological Summary Report presented (Document 9.2.2). There are refinements, but those refinements reflect the natural consequence of additional work, analyses and data being incorporated into the model.*

2.1 Halite asserts that there are no significant differences between the 3-D Geological Model presented in the GSR and that presented by the BGS at the Public Inquiry (2005). The inaccuracy of the British Geological Survey (BGS) model has been demonstrated by the two bores carried out subsequently - Hay Nook and Burrows Marsh - and there is every reason to believe that similar inaccuracies would be revealed if the Halite model were to be tested by further bore holes.

2.2 Regarding the comparison figures (p16 PWG document) for the Burrows Marsh Bore Hole (BMBH), the data from the BGS Model is estimated at a point to the west of the fault. This show a considerable discrepancy from the bore hole data, adjusted for true vertical depth (p2 para 6).

2.3 Figure 2.1 (response from Halite p3) purports to show the relationships between the BMBH and the East Barnaby’s Sands Fault. If the position of the fault is shown absolutely accurately on the Dip Magnitude Maps of the Upper and Lower Surfaces of the halite, then the bore may have just missed encountering the Fault.

2.4 However, that leaves the question of the thickness of the halite bed on either side of the Fault as revealed by those maps. The maps show the upper surface of the halite lying between 15 and 50m from the drilling site, the basal surface 90-150m. The HEG section (Figure 2.1) gives 21-43m for the upper surface, 113-243m for the basal surface i.e. the diagram is at odds with the map evidence.

2.5 In order to fit the evidence, PWG suggests a thickness of the halite bed 170m to the east of the Fault and 220m to the west. In Figure 2.1 the thicknesses are 200 and 386m respectively, although there is some uncertainty because dips are not shown.
3 E-W fracture zone (MMD page 3)

3.1 The dip magnitude maps of the upper and basal surfaces of the halite show that there is a dislocation to the generally N-S trending faults along an E-W line, approximately along northing 464 (see PWG Figure 1 on next page).

3.2 PWG is concerned about the amount of movement and consequent shattering of the rock which resulted in the transposition of the faults. South of this line there is a substantial synthetic fault, north of the line it is antithetic.

3.3 This dislocation also occurs further to the west where it would appear no transposition occurs. However, the basal salt fault line north of the dislocation, although drawn on the dip magnitude map, is not identified by the 3-D modelling.

3.4 Figure 2.2 (HEG response p4) shows extensional folding in an anticlinal segment of the Black Mountains USA and bears no relevance to the Preesall Geology where there is no suspicion of any anticlinal structure in the area between the upper surface faults along line X-X as shown on the PWG Figure 1 (see MMD map 0013).

3.5 The HEG position is that the faults north and south of the zone of dislocation are entirely separate structures and that an east-west fracture zone is not likely to be present, nor is it needed to explain the observed features. PWG remains unconvinced and points out that Cavern 13 would be sited on the line with Caverns 14 and 11 being very close.
4. It is noted that the dip magnitude maps were created from the top and bottom salt grids and therefore do not identify the Burn Naze Fault, the position and magnitude of which remains uncertain (p4 para 2).

5. With reference to the thickness of the halite in the northern polygon, whilst BW 61 and 77 may be on the margin of the basin, BW 43 lies 300m to the west. The assumption by Halite that 81m of salt in E1 indicates the position of the Burn Naze Fault and the use of this assumption as the basis for the location of caverns 1-6 is extremely questionable (p4 para 2).

6. Halite puts much emphasis on the fact that the location and spacing of caverns follow rules as set out by Professor Rokahr. However, these rules have not been adhered to in a number of cases. To state as part of a planning application that “further numerical analysis would be undertaken as part of any detailed analysis” is not acceptable (p4 para 4).

7. Halite appears to confirm that the maximum volume of gas which could be stored i.e. c 900 mcm would only be achieved during the testing of the caverns and that the maximum volume for the caverns under operating conditions is less. PWG suggests that this would be c 650 mcm (p5 para 2).

8. Wet Rockhead and BW130

   a) Halite stresses the unlikelihood of wet rock occurring, citing the conditions in BW 88 as an example. It does not answer the concerns raised by PWG for example regarding the void encountered in BW 130 (p5).

   b) A major issue which we ask to be clarified, concerns the request (3rd May 2012) PWG made to British Drilling and Freezing (BDF) for information about their daily drilling report 13 on BW130 which shows a void at the top of the halite.
c) Howard Mew (BDF) replied on the 9th May 2012 stating that this should be dealt with via the Planning Inspectorate’s Examination process and forwarded the correspondence to Halite. The response from Halite (28th May 2012) was that this matter should be part of the PWG representation.

d) PWG has seen a copy of this report and requests that the Inspectorate asks either BDF or HEG to furnish the same to them for examination by the Inspectorate.

9 The possibility of gas migration from caverns or connecting pipe lines across the Burn Naze Fault and penetrating the Sherwood Sandstone or rising into the glacial sands under Fleetwood is dismissed as not credible (p5). However, HEG does not know the position or the size of the Burn Naze Fault nor indeed if there are a series of antithetic step faults on the western side of the graben. Neither does HEG know whether the Fault (or step faults) is annealed. PWG consider it to be vitally important that this be found out before any statement of credibility about gas migration is made.

10 The possibility of Crown Hole subsidence created by cavern collapse was one of the reasons why after Public Inquiry, the previous application was refused. HEG seems content to avow that subsidence on such a scale will never happen (p6).

11 Attached to the “PWG Evidence - Draft Document” were a number of questions to which Halite provided written answers (28th May 2012).

The PWG response to these follows.

Q1 Halite suggests that a confidence level of 95% would be appropriate, although it does not state specifically that the confidence intervals shown in the BGS diagram (PWG Draft Evidence Figure 1) are based on a 95% level of confidence (p8, para 3.1).
Cavern 2

Halite states that the top of the halite is probably accurate within +/- 20m and the bottom within +/- 40m (assuming a 95% confidence level?). Given that the nearest seismic line is 700m to the south and the uncertainty about bore hole E1, PWG consider that the confidence intervals are far too low.

Cavern 17

Halite asserts that the top and bottom of the halite bed is defined by seismic line GC81-336. The data from this line were reprocessed in 1996 and rejected by the BGS because they were of poor quality. “A large omission zone exists in the seismic coincident with the Wyre Estuary….. These data are difficult to interpret, of limited use and have not been used in this study” (BGS Report CR/05/183N). Again PWG questions the accuracy of the confidence intervals given in answer.

Seismic line GC81-336 extends across the Wyre Estuary, so it could have been used to identify the position of the Burn Naze Fault if the quality of the data had been sufficiently good.

The seismic line GC81-336 (along with IELP 99-25) is given as primary evidence for the faulting shown in the model. The quality of the data has been referred to above (p9, para 3.4).

The PWG assessment of the true vertical depth of the top of the salt at cavern locations 8, 10 and 11 is taken from the MMD maps, and differ from the Baker Hughes Table (p11, para 3.5).

The GSR includes a map showing the location of the caverns in ‘previous proposal’ - January 2010. The application was submitted in 2009 and did not include any map showing the proposed locations of caverns (p12, para 3.6).
Comments from PWG on the Halite Response to Examination Authority’s First Written Questions (1st June 2012)

Geology

Question 1/7
Halite state that “previous applications have proposed a greater number of caverns spread out over a much wider area” (p4,a).

PWG has pointed out in its objection (PWG pp43/44) that in the application which was refused after the Public Inquiry, just 24 caverns were proposed, which were reduced to 20, just 1 more than the present proposal.

The BS EN 1918-3 standard states “the geology of the saline mass should be investigated by seismic survey, if seismic data are not available” (p6,h).

This should apply to the area under Barnaby’s Sands where GC 81-336 has been judged as not fit for purpose. The data from this line were considered “difficult to interpret, of limited use” and were not used in the construction of the BGS model (BGS Report CR/05/183N).

There are no seismic lines which cross the area where it is proposed to locate caverns 1-6.

Question 1/8
“the latest plots” (i.e. the 2010 Rutherford Model) “are purely to aid visual assessment and no increase in accuracy is implied” (p9,a).

Since the 2005 model was deemed by the Inspector at the Public Inquiry not to be sufficiently accurate for planning permission to be granted, the same has to be concluded about the 2010 model.
Question 1/10

“normal faults tend (PWG italics)to have relatively predictable length-displacement relationships, where displacement tends to be approximately 0.01 to 0.02 times the tip to tip length of the fault” (p13,c).

The displacement of the fault at the western end of the Heads is in the order of 143m (PWG p16) implying a strike length of between 7 and 14 km. On the drawing 0001 in the GSR that fault has a strike distance of c 600m.

The East Barnaby’s Sands Fault shows a downthrow of the base of the halite of c 170m. giving a strike length of 8.5 to 15 km, whereas it is shown on 0001 as 1.5 km. Clearly a clarification of this relationship is called for.

Question 1/12

Halite states that “seismic reflection data are of good quality” (p14,a). That does not apply to GC81-336 as has been shown above. It should be noted that in response to Question 1/13 (p15) Halite does not give the range of accuracy for GC81-336.

Question 1/13

The table (p15,a) provided by Halite does not correspond with the information provided at the Inquiry by the BGS, although it purports to do so (see PWG p32 Figure1).

For IELP 99-25 Halite state that at the east end of the line the base halite tied to the Cote Walls Farm BH is <10m. In fact that borehole only penetrated 4.47m into the halite bed so that the base halite cannot be tied to the borehole data. BGS suggest an accuracy of +/- 20m.

For Can-G at the west end of the line, Halite give an accuracy of 10-15m compared with the BGS figures of +/- 20m for the top halite. The base halite is not stated, the BGS suggesting 40-50m.
These data are not sufficiently accurate for interpolations of the halite bad to be made with any certainty between IELP 99-25 and Can-G, and to the north of IELP 99-25.

However, as the answer to Question 1/14 shows, the seismic lines were used in the construction of the model and the Section 1-1 (p16).

**Question 1/28**
“A detailed analysis of core fractures was undertaken by the BGS of the core from the Hay Nook and Burrows Marsh boreholes” (p24,a).

It should be made clear that only short sections of those boreholes were actually cored. In Burrows Marsh BH cores were taken between 129 and 136m (drilled depth) and 336.5 and 339m, a total of 67.4m. For Hay Nook, 3 sections were cored namely between 220 -229.3, 374-383.15, and 423-430, i.e. a total of just 25.45m (BGS CR/10/128 piii).

**Question 1/35**
The consequences for cavern creation created by potential shale gas exploration/exploitation have been interpreted by Halite as being purely seismic (p27).

**Question 1/38**
“The Fleetwood and Preesall waste water treatment works lie directly over glacial tills which are low permeability soils” (p29,e).

The glacial tills include thick and laterally extensive lenses of sands of high permeability. One such lens was formerly exposed in the cliffs of the Wyre Estuary just north of the Preesall Works, and could be assumed to extend under the Works.
Corporate Structure

Question 11/1:
*Please supply the corporate structure of the companies involved in current ownership of land within which the project is intended to be constructed and those undertaking the operation, and the relationship between them.*

Halite’s response is:-

(k) On 30 September 2004, PESL sold the deeper virgin salt deposits and associated surface areas to Halite. PESL retained land which contained most of the salt caverns and salt mines. As part of this sale, PESL granted Halite a right of pre-emption over the land retained by PESL so that if PESL ever intended to sell its land, it would first offer it to Halite.

(l) On 25 March 2010, Halite and PESL entered into a deed of covenant and restrictive covenant. This deed restricted PESL’s ability to develop or dispose of its land within the development site without Halite’s consent. The deed also grants Halite access over the land owned by PESL within the Project site.

The Inspectorate will be better able than members of PWG to decide if Halite’s answer is disingenuous but we would point out that Halite has gone to great lengths to convince everyone that HEG is a new company and not simply a continuation of Canatxx Energy or Canatxx Gas Storage.

However in its evidence to the Inspectorate, 30th May 2012, on page 10, para 2.11 PWG offers the evidence from Companies House to show that HEG only became an entity when it did indeed change its name from Canatxx Gas Storage to Halite Energy.

2.11 *The details held at Companies House show that the company was incorporated on 23rd January 2001 as Hamsard 2280 Limited, changing its name to Canatxx Gas*
Storage Limited on 3rd April 2001 and then to Halite Energy Group Limited on 26th July 2010.

How therefore could PESL sell salt deposits and associated surface areas to HEG in 2004 (as stated above in (k)) when HEG didn’t exist?

Also HEG says it entered into a Deed of Covenant with PESL on 25th March 2010 which is four months before HEG came into existence.

There appears to be another anomaly which is the existence of Halite’s other company Anglesey LNG Ltd which has Keith Budinger, Dr John Roberts, Michael Brown and David Gray listed as directors - all directors of Halite Energy Group - and this company was also the subject of a name change from Canatxx LNG Ltd on 26th July 2010.

The possibility of bringing regasified LNG to Preesall via a 70 mile sea pipeline from Anglesey featured prominently in earlier Canatxx publicity material - the extract from the web site of Energy-Pedia News, 12th January 2009, is shown below.

Canatxx Gas Storage Limited (CGSL) and Canatxx LNG Limited (CLNG) has retained BNP Paribas Corporate Finance to advise it in seeking strategic investors to take a stake of up to 50% in the Company. The planned gas storage facility is located in the Wyre Estuary at Preesall in Lancashire on the Irish Sea coast. The site is planned to be the largest onshore natural gas storage facility in the UK, with initial working storage capacity of 12 billion cubic feet (bcf) in 2013, increasing to 42 bcf by 2018. Canatxx is also seeking indications of interest from parties to enter into long-term gas storage agreements of up to a total of 20 bcf. The Company is offering withdrawal from storage with firm entry rights into the National Transmission System. Bidders are also invited to express interest in an option to purchase equity and/or terminal usage rights from Canatxx LNG Limited, which owns the LNG re-gasification project at Anglesey, Wales. Canatxx received its planning permission in March 2008 and this is one of the only permitted LNG projects in Europe.
The full article can be read on:-

The overview of the Halite Energy Group and its holding companies does not make any reference to this LNG site in its responses to the Inspectorate but PWG would like to know how the proposed financing of the Preesall project and the provisions of decommissioning, etc would be affected by the existence of another company within their group which might require development funds at the same time.
Evidence from Other Interested Parties

Lancashire County Council - Relevant Representation 151

In an email, 12th June 2012, to PWG from Keith Budinger (HEG CEO), on the subject of PWG’s challenges to the suitability of the geology of the Preesall salt field and the options of meeting to discuss the same, Mr Budinger states:-

“You will have noted that statements of common ground have been reached with Atkins and LCC on geology and above ground safety and it may that we can also review those documents at the meeting and identify areas of the SoCGs which you agree/disagree with”.

PWG declined the meeting on two counts, one that it could have prevented us from submitting our questions and challenges to the Inspectorate by 4th July deadline and two that Mr Budinger had already declared in the same email that :-

“Regarding your comments about provision of “in depth assessment”, I should clarify that Halite will not be producing a more detailed response to your April 2012 document and the focus of our written documents will be through the formal Examination timetable”.

The Group saw this as an attempt by Mr Budinger to play down PWG’s challenges on geology by reconfirming that Atkins for LCC and MMD for HEG had reached Statements of Common Ground (SoCG) on geology and this caused us to re-examine what had actually transpired between Lancashire County Council (LCC) and HEG.

Lancashire County Council informed the Inspectorate in their letter, 10th February 2012, that:-

Whilst the County Council does not object to the proposal at this stage, it reserves the right to object at such time as a full and proper assessment of the application has been made, and a local impact report prepared which shows …..
….. That the geological assessment is sufficient to demonstrate the geology of the area is capable of accommodating the proposed development without creating migratory pathways for gas.

In the SoCG the first sentence in 2.7.2 states “The geology has been defined by a three dimensional model which has been based on geophysical surveys, boreholes and historic drilling records”.

In short, HEG has identified an area of salt (referred to as the Northern Lozenge) which hasn’t been mentioned or established as being suitable for gas storage in any of the previous planning applications and this same area has never been physically investigated with on-site boreholes or seismic lines.

PWG contends therefore that the SoCG for this Northern Lozenge has been agreed on a set of propositions, probabilities, models and desk studies and contend that this is in opposition to the recommendations of the Assessor at the Public Inquiry where Canatxx were urged to undertake physical site investigations before any cavern design was undertaken.

PWG suggests to the Inspectorate that the Group’s challenges about the suitability of the salt for gas storage are indeed valid and not mitigated by a SoCG based on theoretical values, however detailed they may be.

Canatxx (HEG) have had almost 20 years (PWG p19, para 4.7) to prove their theories by drilling test boreholes but they have elected not to do this so their exploration of the Northern Lozenge has to remain theoretical.
Halite - Lancashire County Council - COMAH

In the same letter to the Inspectorate, 10th February 2012, LCC states its requirements:-

“That the application demonstrates that the development would not present an unacceptable risk of gas migration, given the relationship of the proposal to former operations and its proximity to residential areas on the east side of the estuary, and the more densely populated Fleetwood peninsula throughout its operation, decommissioning and long term aftercare management”.

and

“That a full risk assessment for the proposal has been carried out that would address the fear and distress within the local communities attributable to the nature of the proposal and the potential consequences of any accident / incident occurring”.

and

“The proposal would maintain appropriate distances between establishments and areas of public use, in accordance with the provisions of the SEVESO II Directive, and that any measures to maintain appropriate distances can be achieved without the closure of a section of the Wyre Way within the application boundary on a permanent basis”.

It is PWG’s understanding that Halite would be responsible for the on-site emergency plan(s) for gas storage under COMAH and its eligible pipelines to junctions with the national network and our thoughts on the company’s ability to discharge this responsibility have already been recorded in our evidence.

The Group further understands that according to “HSE Guide to COMAH Regulations 1999 as amended” the responsibility falls to LCC who “must prepare an adequate emergency plan for dealing with the off-site consequences of possible major accidents’ Including:-

‘the arrangements established to help with the emergency response on site’.
PWG has stated in its evidence that the ‘off-site consequences’ following a gas migration from the proposed site would require a plan to evacuate residents from the Fleetwood Peninsula or the Over Wyre villages which we suggest would fall to LCC to organise.

Not wishing to become involved in semantics, in LCC’s representation, it states on page 5:-

“The Preliminary Quantitative Risk Assessment concludes there is no risk of gas leaking from the caverns necessitating large scale evacuation. Whilst it is acknowledged that the proposal would be subject to COMAH, and which would minimise the risk of accidents involving dangerous substances, and to limit the impact of the proposed development on people and the environment in the event an accident were to occur, it is considered that an emergency plan to provide for any such risk or incident should be provided”..

In our opinion, three words from the end it says ‘should’ but we contend that there is no ‘should’ but there is a ‘must’ according to COMAH regulations and whilst there is no criticism of LCC’s particular choice of word, the ability to comply with this element of the COMAH regulations may hang on this very point.

To mitigate against a gas migration and to minimise the potential threat to life that might subsequently occur, the necessary evacuation of residents is a distinct possibility.

PWG (page 96, para 8.59) suggests that this would be an impossible task and unless LCC can demonstrate otherwise by producing such a plan, it has to be considered that this application would not meet the standard required by COMAH regulations and therefore we suggest that the granting of the Development Consent Order should not be considered until it is proven that COMAH regulations can be met.
United Utilities

It was surprising and indeed of great concern to note the absence of any comment from United Utilities (UU) to the Inspectors on the possibility of gas migration from the proposed site to the Fleetwood Waste Water Treatment Works (WwTW) and the Fylde Coast Interceptor Tunnel.

This was discussed at length in PWG’s evidence (page 86, section 8).

Para 8.10 specifically comments on the interchange between Halite and United Utilities

This is not only a concern of the Protect Wyre Group; United Utilities informed Halite of their concerns on this matter in July 2011 when they said:-

“The risk of gas escaping the caverns and entering the tunnel provides a clear route for passage of leaked gas all the way along the front to south Blackpool”.

See also

Para 8.60 records United Utilities concerns as expressed to Halite Energy in June 2011:-

“Fleetwood WwTW : located on the west of the Wyre Estuary, this works is less than 2 miles away from the gas storage caverns and is a very significant works serving the whole of the Blackpool and Fleetwood area (a population of up to 426,000 during peak season)”.

See also

Para 8.70 records where Unite Utilities further commented to Halite Energy in 2011

“The developer would have to satisfy UUW that sufficient boreholes / ground water investigation had been done to understand / assure UUW that the development would not increase the risk of future explosions of gas impacting upon the treatment facilities or sewers draining to these works”.

PWG asks that the Inspectors consider this omission and that they request reasons from UU as to why they have made no further comment to the Inspectorate about their concerns.

If UU have indeed had their concerns addressed by Halite, in spite of there being no available borehole data on the ground between the WwTW and the Halite site, it must be of interest to the Examination to understand what assurances or guarantees have been offered and the foundation that any such assurances have been based upon.
The Wyre Way & Knott End Golf Course - COMAH

The third italicized paragraph on page 19 of this document refers to LCC’s statements (see below) about COMAH and the potential to close the Wyre Way.

“The proposal would maintain appropriate distances between establishments and areas of public use, in accordance with the provisions of the SEVESO II Directive, and that any measures to maintain appropriate distances can be achieved without the closure of a section of the Wyre Way within the application boundary on a permanent basis”.

Similarly in PWG’s evidence to the Inspectorate 30th May 2012, we commented upon this matter

2.13 The Planning Inspectors are asked to also consider the implications of COMAH and HSE legislation which will almost certainly cause the closure of the Wyre Way to the public - something the Secretary of State opposed in her decision letter of 16th October 2007.

And again in section 6 where we additionally commented upon the proposed new well head being sited upon land not owned by HEG but by the Knott End Golf Club.

6.28 Halite appear to be following the same path as the previous Canatxx regime in overlooking this basic requirement and continue to expose members of the public to risk whilst walking the Wyre Way, and with them becoming a potential unwitting ignition source should their presence possibly with smoking materials coincide with a loss of containment incident.

6.29 Halite have modified the earlier Application but in so doing have located a new well head position onto the south end of the Knott End golf course. By doing so they have now included well heads on either side of the Wyre Way and thus
ensure that ramblers, dog walkers, children and the like are passing between well heads as they legitimately continue to enjoy use of this age old route.

There are two additional points that PWG would like to raise on this matter.

The first is that in addition to the users of the Wyre Way being endangered by the position of the proposed new well head, (see 6.34), our estimates of distance from the well head to the southerly greens and tees at Knott End Golf Club would place the club’s members, visitors and staff within the accepted 250 metre exclusion zone from a well head whilst using the course.

The screen grab below offers a rough estimate of distances.
It is hoped that Knott End Golf Club will make their own representations to the Inspectorate about the proposed siting of the new well head on their land highlighting the dangers it might pose to their members, visitors and staff and also to the future financial viability of the Club.

If this scheme were to go ahead with the well head at this location, PWG is of the opinion that it would probably propel Knott End Golf Club towards closure as the reduced course playing length and the potential dangers posed made it commercially unsustainable.

The second additional point to be made refers to LCC’s concerns about the Wyre Way being closed on a permanent basis.

PWG has raised significant concerns about the perceived inadequacy of security provisions in the Halite scheme and it has concerns that the assurances given at the planning stage might well be overturned if the development were to go ahead. This could possibly involve the total closure of the Wyre Way in the area and indeed the golf course as well.

One would like to think that the conditions laid down when a Development Control Order is granted remain in force both during the development and operational phases but there would be nothing to stop HEG applying for a variation of their scheme to extend their security boundaries or the scheme could even be sold on to another developer who might take a totally different view about the implementation of COMAH and indeed seek to ring fence the entire site - thus closing the Wyre Way and enclosing some of the golf course playing area.

This possibility was highlighted by an article in the Hull Daily Mail on Friday 29th June 2012 where Scottish and Southern Energy plc and Statoil (UK) Ltd sought to relocate the main well head and the main access to one of their facilities at Aldbrough and to add a new warehouse facility, much to the concern of the local residents who had previously enjoyed a good relationship with the developer. The residents’ reported comment below raises a number of issues on the matter:-

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The company behind one of the country's largest onshore gas storage facilities have been told to improve relationships with the community.

Councillor John Whittle said the trust of Garton and Aldbrough residents in SSE and Statoil was "eroding about the same rate as the coastline".

His comment came as the energy firm's application to relocate the main access to one of their facilities was approved, subject to bridleway improvements, community funding, traffic and landscaping and environmental matters.

The decision had been deferred from earlier this month for more time to be considered on the scheme.

Speaking after the meeting, Steve Mattinson, vice-chairman of Garton Parish Council, said: "It is not the decision we wanted and it is disappointing.

"We are not against the gas storage, we just want the companies involved to speak to the residents as good neighbours.

"In the past, they haven't done the landscaping they said they would do and we feel let down."

Residents are concerned the planning system has failed to adequately control the development to date, with claims the complex built bears little resemblance to what was originally proposed and approved.

Mr Mattinson said: "Although their application wasn't deferred, as we would have liked it to have been, it was evident the companies were sent a clear message not to treat the residents as they had done in the past. The councillors told them the last few years have been unacceptable.

"We will be looking carefully at all the details and if it they are not being enforced we will be hassling them."

Nine caverns are nearing completion and another nine are being proposed in a second phase of the £400 million project after the development was approved four years ago.

The latest permission, approved in County Hall in Beverley yesterday, was to move the main wellhead platform further inland, together with the construction of a new centre warehouse facility and a new access road.
The companies said the move is necessary because of an increase in the rate of nearby coastal erosion.

However, the plans triggered concerns from residents. Some fear the extension of the existing facility, along with plans to increase the working hours of the plant to a 24-hour operation, will turn an area of open countryside into a sprawling round-the-clock industrial site.

Mr Mattinson said a community liaison group set up to work with SSE and Statoil, existed in name only and there had been no representatives from the companies at the last few meetings.

Accepting that any development proposal can only be judged on the merits of what is proposed it does beg the question if this the right development for this area and what future safeguards the residents of Wyre might have if this scheme were to go ahead.