Dear Mr Hudson

PLANNING ACT 2008 – (PA2008) AND THE INFRASTRUCTURE PLANNING (EXAMINATION PROCEDURE) RULES 2010

PROPOSED UNDERGROUND GAS STORAGE FACILITY AT PREESALL, LANCASHIRE

REQUEST FOR WRITTEN COMMENT

In accordance with Rule 17 of the Infrastructure Planning (Examination Procedure) Rules 2010

I write further to your letter of 28 September 2012 in respect of the proposed amendments to Requirement 6 by the insertion of a new subparagraph (2).

I am aware Halite may not support this proposal and may be of the view that matters of this nature are already provided for as part of the COMAH process regulated by the Health and Safety Executive.

The issue of geology has always been a major concern to the County Council. Notwithstanding the further assessment of geological information by the applicant, the acceptability of such by the County Councils specialist advisors and signatory to the Statement of Common Ground on Geology, the County Council, as part of its Local Impact Report (paragraph 11.5) requested the Examining Authority to be satisfied that the applicant has demonstrated that the geology is present in a form that is capable of safely accommodating the proposed caverns and that the proposed standoffs between the caverns and the existing caverns as part of previous solution mining operations are sufficient to ensure the integrity of the proposed caverns in a way that would be safe and not give rise to the migration of gas through the geology of the area or be at risk from seismic movement.

Requirement 6 seeks to address some of these concerns and limits the extent of the proposed development but is reliant on COMAH. Whilst it is acknowledged that COMAH would require such information, the proposed insertion requires the demonstration of

Jo Turton
Executive Director for the Environment
Room C9  •  County Hall  •  Preston  •  PR1 0LD
geology before the provisions of COMAH take effect. The proposed insertion would address the absence of physical information on the geology of the area within which caverns are proposed and would demonstrate the capability of such to accommodate them. This would be helpful given that a significant percentage of the infrastructure needs to be constructed (with associated impacts) before a cavern could be created.

It is recognised that the requirement for such information may be seen to overlap with or falling within the HSE's domain but it may be reasonable to require such information for landuse planning purposes and for it to be a matter for the Development Consent Order stage in advance of COMAH. In principle therefore the County Council would support the proposal to require the applicant to physically demonstrate the presence and extent of the halite bed and which is consistent with comments made in the local impact report.

However, it is noted that the proposed amendment requires the information to be submitted to the County Council. The County Council is not the relevant authority and is of the view that if the requirement were to be amended then the outcome of any investigations should be submitted to Wyre Borough Council.

If the requirement is to be amended, the County Council would wish to ensure that the requirement is sufficiently precise to identify what geological site investigations are necessary to be undertaken and that restrictions on the development going ahead should be imposed in the event faults of such a size as may affect the integrity of the proposed caverns are identified and that the size of such be defined. If this is not possible, then reliance will have to be placed on COMAH.

The views expressed in this letter are subject to confirmation by the County Council's Cabinet Member for Highways & Transport, Economic Development and Planning.

Please do not hesitate to contact me if you require anything further.

Yours sincerely,

Stuart Perigo
Development Management Group