Hallo Oral Hearing – 18/10/12

Intro:

Thank you for letting me speak at this session today. I think it important that all interested parties were given the opportunity to summarise their concerns at the end of what has been a long, drawn out process.

However, before I list my objections, I just want to put on record my admiration for the work that has been done by the Protect Wyre Group in making the views, fears and objections of local residents known to the panel throughout this inquiry, as they have done with previous applications. Their opposition is not based on NIMBYism, but on well researched, reasoned, and professional evaluation of the evidence at hand. They have negotiated with Halite where they could, and with all other parties as well, in a fair and even-handed way. And I hope that is recognised by the Panel and others.

I would add that I also believe their objections to be valid and based on clear, empirical evidence, and as such I will be referring to some of their arguments during my statement.
Need:

I want to begin by addressing the overriding issue of need.

I accept that under the framework set out in the National Policy Statements, need for more gas infrastructure, including gas storage, is deemed to be of national importance. And because the need is referred to in those documents, it has to be taken as a given.

However, as the Panel have to weigh up the need argument against any reasons for objecting to the scheme, it is surely the case that the level of need comes into play when considering whether to recommend that the Secretary of State grant permission or not.

And in this particular case, Halite’s proposal has shrunk compared to previous applications, reducing the amount of national need the development could ever meet.
But secondly, the fact is that since the National Policy Statements for Energy were passed, numerous other gas storage sites have been developed, coming on line around the UK. Of 4 projects that were listed only as being under development in 2009, 3 now have onshore caverns operating in part or in full, and the 4th project has been started. These will provide an extra 1 BCM, meaning an additional 25% of storage capacity is either online or due to come online. Moreover there were an additional 12 projects that had received planning consent back in 2009. Most of those are now being built, which will more than double storage capacity yet again.

This new capacity, and the smaller scale of Halite’s scheme, radically alters the claim that this project will add an extra 20% to the UK’s gas storage. Halite’s likely contribution is diminishing with each already consented scheme that commences building. And as such, the scale marked ‘need’ has lost significant weight over the past year or so.
Proximity/Geology:

Turning to the geological suitability and the safety of the site, I know this is an issue that has been pressed strongly by the Protect Wyre Group, including in their presentation last night. I support their analysis 100%, particularly given the proximity of such a large residential population to the proposed site.

80,000 people live within a 3 mile radius of the development, with the nearest residential properties just 1,000 metres. The significance of the 3 mile distance has been cited often by the Protect Wyre Group so I will not repeat the arguments here, other than to say I share their concern.

Quite understandably, residents living so close are fearful of what it might mean for them, whether in terms of future subsidence of caverns or in terms of gas migration. The storage caverns will be the shallowest in Europe and the site sits between 2 major fault lines. Moreover, as I am repeatedly told as I travel around my constituency, this area has some of the most ‘unique’ geology in the country. It is perhaps that uniqueness that meant previous companies have not tried to develop gas storage sites here in the past, choosing instead to acquire and develop other locations in the UK.
And of course there was the brine well blowout as recently as last year, putting doubt into the minds of residents that Halite can properly manage the safety of such a big site.

Halite could have allayed these concerns and fears simply by carrying out more borehole tests across the site and surrounding area, gathering more accurate and up-to-date data, as has been repeatedly requested by the Protect Wyre Group. A key reason for the failure of the previous applications on this site was due to a lack of geological data. But little new work has been done since. Instead, only two additional boreholes – at Hay Nook and Barnaby’s Sands – were drilled, and in both instances those results have more raised questions than they have answered over the accuracy of the rest of the modelling for the area.

The fact is that Halite is still basing their argument largely on re-assessing previously collected data. Little has changed since previous applications for this site have been rejected for lacking geological evidence. There are still major uncertainties in the modelling and simply conducting more desk-based research is not good enough.
And to return to the issue of proximity to residential dwellings, I would have thought and expected that this would require a greater level of certainty, proven through more physical geological tests, than other sites where residential sites are further away from the main development. Both to allay the fear of residents and actually to prevent any major incident from occurring.

Safety:

I want to reaffirm the concerns expressed already by others about the safety to anyone using the Wyre Way, which will be in close proximity, indeed sandwiched between, two well-heads. It is impossible to manage access to the Wyre Way, and to account for people's presence there in an emergency. I understand that similar concerns were used as a reason to refuse previous applications and, in this case, if anything, those concerns are now magnified.

- Fleetman Treatment Works -
Shale Gas:

I also believe the panel needs to consider how any expanded drilling for shale gas will affect the integrity of the proposals here in Preesall. (Incidentally, it is around the research into the presence and usability of shale gas that the ‘uniqueness’ – which I take to mean unpredictability – of the region’s geology has become clearer).

We know now that the fracking process has caused minor earth tremors in the area. However, both the frequency and the scale of those have been caused by just small-scale drilling operations. Were we to see a move from exploratory drilling to full-scale production – which looks increasingly likely - the effects of that process on the surrounding geology and equipment through repetitive seismic activity needs to be fully taken into account. Whilst the design and structural integrity of the drilling rigs and well heads must be a consideration for the HSE, the structural integrity of the caverns and the geology must be of paramount importance as part of this Panel’s considerations. This is yet another reason why the lack of much more detailed geological study is of such great concern. Fears could have been allayed but, by choosing not to carry out more definitive work, doubt remains.
Socio-economic analysis:

In weighing the application, the Energy NPS states that socio-economic arguments need to also be taken into account. Halite claims 200-300 jobs will be created during construction and 45 more jobs will be created permanently once the facility is operational. Even if that figure is taken at face value, that is a small increase in jobs which has to be set against possible job losses elsewhere if the scheme impacts on the rural economy and tourism. To that should be added the loss of property value in the area – I utterly dispute the statement provided by a single chartered surveyor in Hull, pushed out by Halite in their consultation document, saying that developments of this kind have no affect on property prices. There is also the fact that local residents will be living in fear of the site, as recognised by the County Council in their Local Impact Assessment.

Therefore, in socio-economic terms, the effect on the local area will be entirely negative.
Noise:

I want to briefly touch on a more detailed issue that will affect nearby residents' quality of life, namely the level of noise that will occur during the construction and development phase of the project.

I understand that the Noise Management Plan allows for an average of up to 60 decibels over the course of an hour during normal working hours, or 55 outside normal working hours. Moreover, with just 48 hours notice to the relevant authorities, that noise level can be exceeded.

That 'average' rule could well mean short periods of intense noise - much greater than 60 decibels - could occur on a regular basis and still remain legal. However, all of this is difficult to calculate as the precise location of much of Halite's building work has yet to be pinned down. Yet again, we have so many unknowns within this application.

And of course, this entire issue of noise is yet another problem created by the site's proximity to such a large residential areas.
Landscape and visual amenity:

Turning to specific objections, I agree with Lancashire County Council that the proposal will significantly damage the landscape and visual amenity, damaging the open countryside and rural environment. In fact the proposal runs contrary to a whole host of local and regional planning policies. And the scale of the development, particular of the compressor station, will fundamentally alter the character of the area. This is, perhaps, of even greater concern given that the Morecambe Bay Partnership is bidding to improve tourism in the area by improving links around the Morecambe Bay, including through enhanced cycle tracks, estimated to bring in over 200 new jobs. Damage to the character of the area, and the siting of the whole development, will undermine that potential tourism boost and the jobs it will bring.
Environmental:

You have already heard from my colleague, Ben Wallace, about concerns over the damage this proposal could do to the environment. I will not repeat all of what he has said but, suffice to say, I share his concerns.

However, since I was elected, I have been discovering just how unique this area is, especially the wildlife and sealife in the Morecambe Bay and Irish Sea. Over recent years, various authorities have been urging that greater, not less, protection be given to the Bay and the surrounding area. Battles have taken place over the siting of various wind farms, and efforts made to mitigate the effects they cause. And United Utilities are even spending huge sums of money to try to clean up the area still further. I have supported those efforts.

So I simply cannot support a proposal that will lead to a major brine discharge – over 50 million tonnes - into the Sea, damaging that sealife and marine habitation for years to come. Just as I am amazed that Natural England has not been more aggressive in trying to protect the SSSI through this planning process, I am also amazed that those
responsible for protecting marine life have not taken a more strident stance too.

**Cumulative impact:**

Finally, in meetings with Ministers, and in Parliamentary debates, I have been repeatedly assured that the cumulative effects of various energy projects will be taken into account during the planning process. The simple fact is that this part of Lancashire is seeing far more than its fair share of development – for instance, the onshore and offshore wind turbines by their hundreds, and the National Grid Pylons and substations which are now being planned to connect everything to the Grid. Having met with National Grid just this week, I know that there will be an impact on the local area.
Conclusion:

In conclusion, this application is little different from previous, rejected applications. I believe that the need for this type of storage facility has receded given other projects are coming online, and that the reduced scale of this development will contribute less to that reduced need. I believe that irreparable damage will be done to the local landscape, which in turn will damage the local economy. I believe this part of Lancashire has more than its fair share of energy developments directed towards it and that one of these in particular, shale gas exploration, has a serious potential to destabilise the integrity of the Halite site. But perhaps most importantly, I believe that there has been too little physical geological study to allay concerns of residents, 80,000 of whom live in close proximity to the site, and that there are therefore still valid fears over safety.

I sincerely hope that this application will be rejected and that my constituents can finally get on with their lives without fear of this proposal hanging over them, as it has done for so long.