

From: [REDACTED]
To: [Preesall Underground Gas Storage](#)
Subject: FW: Preesall Saltfield Underground Gas Storage - EN030001
Date: 28 April 2014 10:07:41
Attachments: [The Planning Inspectorate Halite 4-14.docx](#)

The Planning Inspectorate,
Preesall Team
3/18 Eagle Wing
The Planning Inspectorate
Temple Quay House
Temple Quay
Bristol
BS1 6PN

Dear Sir,

Thank you for your e-mail about the review of the Minister's decision.

Having made many objection to this scheme which have been upheld by various bodies I find it offensive that the previous decisions are being reviewed - almost saying that our views are not worth consideration or our concerns and fears irrelevant. I therefore re-iterate our stance made in the previous objections and wish to add the attached further objection.

Yours faithfully,

J.W.Whitham,

Secretary to North West Fisheries Consultative,
Secretary to Ribble Fisheries Consultative Association,
Secretary to Mid Ribble Angling Society
Council Member for the Hodder Consultative

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Preesall Saltfield Underground Gas Storage - EN030001

As Secretary to three organisations NW Fisheries Consultative Ribble Fisheries Consultative and Mid Ribble Angling Society, I have submitted objections to this scheme for over 10 years. While I acknowledge that there have been some changes to the initial proposals the fundamental objects remain and have now been brought into even sharper focus by the development of Fracking in our area. Therefore I must, on behalf of all three organisations again register our opposition and in so doing support the other organisations that have opposed this development.

How many more times will this company bring forward this scheme despite being rejected in the past by everyone from the Town Parish to two Secretaries of State and through a Public Inquiry? Nothing has changed in their application except this time they propose excavating new caverns instead of using old ones! The resulting brine, estimated at over 45 million tonnes, would be pumped into the sea off Rossall. The above proposal to store natural gas under the River Wyre estuary is deeply flawed.

The effects of this amount of concentrated brine going into the sea would be dramatic to the environment and sea life in the vicinity. The idea that this will somehow be localised to a small area of the sea bed is nonsensical since it does not take into effect the sea currents at sea floor level nor the changes in currents caused by the variations in temperature in such a shallow sea. It is one thing to try and establish currents at the surface, totally different to do so at the sea floor level.

Our concern is for all fauna and flora that could be affected by this salt including damage to the food chain for a range of marine life, but most especially we would wish to draw attention to the potentially damaging effect upon the environment of such a concentrated salt solution, especially at temperature, and how it would decimate the natural marine life in the area. The tidal flows in the Irish Sea would not encourage dissipation, as might be the case in the Atlantic, but rather mean an increased concentration in the whole of the Irish Sea and so a "marine desert" could be created.

This would have a disastrous effect on the shrimp and shellfish of the area – i.e. the food chain for other species and would, in turn, ruin the livelihood of many people who have depended on the sea for generations. Similarly, there would, we are convinced, be a detrimental effect on the tourist industry in the north west as the purity of the sea water along the coast would once more be compromised. The hard work of recent years to improve water quality on our beaches would once again be put in jeopardy by the perceived needs of industry. Indeed, the fact that such an application has now to be submitted clearly indicates that the whole concept of using the salt mines for gas storage is ill conceived and not completely thought through.

We would however draw attention to the potentially damaging effect upon the wild Atlantic salmon. The wild Atlantic salmon is the tenth most threatened of all species in Europe and its decline is well documented and internationally recognised. The rivers of the North West of England are some of the most important for the species. Furthermore, many of the rivers of the North West do not have self-sustaining stocks of these fish. Salmon breed in rivers and always return to their river of birth. Upon return from the Northern Atlantic to breed they are known to detect their parent river by organoleptic (smell, salinity etc.) sensing. In the coastal area near the river's estuary the salmon's physiological functions change to accommodate living in the fresh water of their breeding river. Young salmon leaving the parent river for the ocean part of their existence go through the reverse process. The natural stable coastal and estuarine salinity levels are therefore absolutely critical for the continued existence of the salmon species in the North West rivers.

In addition, another salmonid, the sea trout, is an important sea species that does not leave the coastal areas other than to breed in the rivers of the region. This fish also undergoes the same physiological changes as the salmon prior to moving into fresh river water in order to breed and the reverse when returning back to the sea. The importance of these species is clearly demonstrated by the fact that the north west has the three prime migratory fish rivers in the country.

These processes of physiological adaptation are only capable of dealing with the very limited salinity ranges, which occur naturally. Unnaturally increased salinity levels and salinity gradients will significantly interfere with the salmon's ability to migrate to their breeding rivers and for the young fish to enter the sea. Furthermore, even though the discharged salinity may seem relatively localised affecting the Rivers Lune and Wyre it will also, since the salmon use distinct sea routes from the North Atlantic, affect the salmon populations for most of the rivers of the North West and perhaps even further southwards including Wales.

The problem with the environment is that once it has been affected it can take many years to recover, assuming that it can. Man has a nasty habit of ruining the environment and then belatedly realising what he has done when it is too late. Sadly the Environment Agency is not very good at taking action to forestall environmental disasters and tends to react after the event rather than take a precautionary approach. The North West has some of the best marine life and salmon and sea trout fisheries in the country and this project would place the 45 million tonnes slap bang in the middle of them, and onto one of the key routes of passage for migratory fish. We consider that this project would have a disastrous affect on these very important, and in the case of the wild Atlantic salmon, could threatened the survival of the species in our country. **On environmental grounds alone this project should not be allowed to go ahead.**

Much has been done over past decade to ensure that the Ribble has maintained its runs of migratory fish through habitat work, catch and release propagation programmes etc, which has proved success in that the Ribble has joined other rivers in the north west as category one migratory rivers in the UK. Indeed, the Ribble is unusual in that it supports both salmon and sea trout migrations. These fisheries represent considerable investment and have a value in excess of £15m. Add to that the increased value to the North West economy and many more millions are added. **Therefore, on economic grounds we feel the project should not go ahead.**

The country is under pressure to improve bathing water quality and is already struggling in many areas, especially the north west. Salt doesn't remain in a fixed area it will be affected by the sea currents, tides winds and waves The proposed discharge will therefore affect the Irish Sea as a whole and will further undermine the efforts to clean up bathing waters. Indeed it will alter the whole ecology of the sea thus encompassing designated Marine Conservation Zones..

Let us look at the health and safety aspect of this project. Halite, and its forerunner Canatxx, naturally claimed that "maximum safety will be ensured in all aspects of the construction and operation phases". Plainly they could hardly say anything else but equally plainly this is an operation with a high risk factor.

There are numerous examples of failure of such promises; Abbeystead, Buncefield and Flixborough spring to mind. Too many people live in close proximity to this proposal for it to be acceptable. It is documented that pressurised gas can travel up to 10 miles underground from its source as it tries to surface with all the possible consequences of fire and explosion. There are numerous abandoned salt mines within close proximity of the project and there is a danger of the gas escaping into them. One of these caverns was used for the storage of toxic mercury sludge. The thought of this escaping into the environment is not a thought to contemplate.

Despite these claims there has been recent examples of leakages from the salt caverns, which resulted in the closure of local roads and a very expensive clean up. Salt is a very unreliable rock structure that is liable to crack and does allow seepage so it is impossible to determine where gas may get to. This results in a dangerous situation for residents not just in the immediate locality but much further afield. Add to this the possibilities from fracking in the area and the potential for disaster is magnified in the extreme.

Indeed the initial exploratory drilling for fracking cause seismic activity in the area which meant that operations had to cease whilst tests had to be undertaken to determine safety levels, clearly indicating that the operators didn't realise or understand the implications of their actions. This is not a recipe for the development of gas storage in salt caverns, rather a recipe for a major disaster and loss of life. If we must have these developments then we must ensure that any risk, no matter how slight, is reduced to its absolute minimum.

The Protect Wyre Group lodged a series of very important questions but the company has either given perfunctory answers or failed to respond altogether, hardly the actions of a company that is absolutely sure of its evidence base.

The North Western Inshore Fisheries and Conservation Authority is the relevant body for the regulation of inshore sea fisheries within its District and has a range of duties including ensuring the sustainable exploitation of sea fisheries resources and protection of the marine environment from sea fishing activities within its district and their submission focussed on the very negative impacts of the proposals. They also pointed out that the research undertaken as part of the previous considerations was now seriously suspect due to infrastructure changes. They also asked for a review of the initial E.A. consent.

Once again I urge that this proposal is rejected on both environmental and safety grounds.

Yours faithfully,

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