

**Greenscar Cottage  
Back Lane  
Preesall  
Poulton Le Fylde  
Blackpool  
FY6 0NG**

4<sup>th</sup> May 2014

Mr Giles Scott  
Head of National Infrastructure Consents

Department of Energy &  
Climate Change

3 Whitehall Place  
London SW1A 2AW  
T: +44 (0)300 068 5770  
E: [giles.scott@decc.gsi](mailto:giles.scott@decc.gsi).

## **PRESALL UNDERGROUND GAS STORAGE FACILITY**

Dear Mr Scott

Thank you for your letter of 8<sup>th</sup> April inviting representations in respect of the further matters which the Secretary of State considers relevant to the redetermination of the application .

In the same order as the relevant matters listed in your letter, I would comment as follows:-

- 1) I do not believe that the stated storage cavern capacities can be demonstrated as being achievable without further geological investigation. I further believe that the proposed capacities have been overstated by Halite in order to encourage the belief that the project furthers the national interest with respect to gas storage capacity.

My view is that the potential safe storage volumes are substantially lower than those proposed by Halite and that the safety of the large populations within very close proximity to the proposed development far outweighs the limited contribution to the national interest that the small volume of stored gas would provide.

- 2) I consider that the Development is not consistent with the National Policy Statement for Gas Infrastructure and Gas and Oil Pipelines (EN4)

- 3) I do not consider that the Secretary of State should, on redetermination, grant consent for the Development, but in the event that he does grant consent, it should certainly be subject to the terms of the "Requirement 6 of the draft development consent order as recommended by the Examining Authority in its report of 21<sup>st</sup> January 2013.
- 4) My view is that the environmental information provided by Halite in support of the application was not adequate and further information and updated information is required.
- 5) I have no other issues arising since 9<sup>th</sup> of April, but would reiterate my view that the Secretary of State's decision on 9<sup>th</sup> April to refuse the Halite Application was completely justified, and that Halite have not produced any further information which would cause me to change my opinion.

Yours Faithfully

P J Moore