

From: [OLLERENSHAW, Eric](#)
To: [National Infrastructure Consents](#)
Subject: Halite Application - Preesall Salt Field - Submission of Interested Party
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Attachments: [image001.jpg](#)
[image002.png](#)
Importance: High

The Rt Hon Edward Davey MP
Secretary of State for Energy and Climate Change
c/o National Infrastructure Consents Team
Department for Energy and Climate Change
2nd Floor Kings Buildings
3 Whitehall Place
London SW1A 2AW

09 May 2014

Our ref: LF3532

Dear Mr Davey

Further to your letter of 8th April, I would like you to consider the following submission when re-determining Halite Energy Group's application to store gas underground in the Preesall Salt Field.

- i) *Further geological information to demonstrate the Applicant's case that the anticipated total storage capacity of up to 900 million cubic meters and working capacity of up to 600 million cubic meters at standard temperature and pressure in the area for cavern development can be achieved.*

Since the initial application in 2003 Halite, formally known as Canataxx , have been given every opportunity to demonstrate that the unique geology of the Preesall Salt Field is suitable and safe for the underground storage of gas.

It is clear that they have failed to provide sufficient evidence about the safety of the geology of the site and it is also clear that Halite have been fully aware of the need to resolve this issue but have failed to do so.

All previous applications have been refused on the basis of this insufficient geological information as demonstrated below;

In 2005 it was determined by the Lancashire County Council that they were minded to object to the then application with one of the grounds being that there was insufficient information of the assessment of the geology and whether it was capable to support his development.

In 2007 the Planning Inspector, Edward Simpson, advised the then Secretary of State (when considering Halite's appeal) that "While there is an acknowledged need for more Underground Gas Storage, in the context of the **uncertainties that underlie the suitability of the geology of the Preesall Salt Field** to accommodate the appeal proposal, that national need cannot be extrapolated to mean that there is a specific need for the appeal proposal."

He also concluded that "...this risk of crown-hole subsidence, because it would appear irreversible if it did occur, is sufficient reason of itself to refuse planning permission"

As well as that he went on to advise that "considerable uncertainty... exists relating to constraints that fundamentally affect the location of the caverns and the capacity of the scheme".

The Inspector also commented that the "uncertainty as to the vulnerability of properties to gas migration, and hence potential explosion, makes this currently an unacceptable location for underground gas storage."

And additionally "in the context of the uncertainties that underlie the suitability of the geology of the Preesall Salt Field ..."

The Secretary of State refused the appeal and commented that "...the risk of crown hole subsidence is a significant concern".

The subsequent application, which the Planning Inspectorate reported on in 2013, has again provided no further geological data and instead depends on remodelling of previous data.

The Planning Inspectorate's report stated "The definition of the proposed polygon areas therefore relies heavily on the 3D model which includes various types of data derived from sources of different quality with respect to reliability and accuracy...The model does not differentiate between different types of data nor does it make allowances for the variations in the accuracy of each type." (para 5.21)

I understand that following the latest refusal for Planning Permission, Halite have now carried out Seismic testing, however I believe that as of today the details of this testing have not been made public so I am, as yet, unable to comment on them.

Although I acknowledge that The Secretary of State has written to interested parties with a Statement of Matters with respect to further written representations requesting responses on "further geological information to demonstrate the Applicant's case...", I feel that considering Halite have been afforded the opportunity since 2006 to be forthcoming with this information that any new submission of geological data should form the basis of a separate planning application and not be considered when the Secretary of State determines the current application.

- ii) The extent to which the development is consistent with National Policy Statement for Gas Supply Infrastructure and Gas and Oil Pipelines (EN-4)

I do not believe that Halite's application is consistent with the National Policy Statement for Gas Supply Infrastructure and Gas and Oil Pipelines (EN-4) as it fails to satisfy the requirement made under Paragraph 2.8.9.

This states that "Applicants should undertake, and supply to the IPC, a detailed geological assessment to demonstrate the suitability of the geology at the site for the type of underground gas storage proposed... When considering storage in a salt cavity, the geological assessment should include depth below surface, salt thickness, salt purity and presence of shale bands which could affect cavern design. In addition, a study of the geological integrity of the overlying strata and potential for collapse, taking account of the proposed minimum and maximum working pressures, will need to be undertaken."

The Planning Inspectorate in their 2013 report acknowledged that the geological data relied heavily on a 3D model and that the data was of different quality with regards to reliability and accuracy.

They also acknowledged that "the thickness variations in the halite are too poorly known in the southern polygon and are disputed on the basis of the interpretation of a single borehole in the northern polygon"

More worryingly it was also noted that "Where detailed geological information is available, the Applicant has decided that the halite is too faulted or too close to existing workings to be suitable for safe construction and operation of UGS"

Finally the Planning Inspectorate acknowledged that "...much of the analysis has been based on reinterpretation of data that was provided for the previous unsuccessful planning applications" therefore I feel that this, again does not comply with the National Policy Statement for Gas Supply and Infrastructure.

- iii) Whether, if the Secretary of State decides on redetermination to grant development consent for the Development, he should do subject to the terms of requirement 6 of the draft development consent order as recommended by the Examining Authority in its report of 21 January 2013

Schedule 9 Requirement 6.1 and 6.2 states "No stage of authorised development should commence until:

6.1

- a) A geological of the "area for cavern development"... has been carried out to confirm the top and bottom levels of Preesall halite deposit and the presence of any faulting to a confidence limit of ± 5 metres;
- b) the working capacity of Work No 1A has been calculated taking account of the results of the geological survey and sub-paragraph 4 (a) to (h) of this requirement; and
- c) the results of the geological survey and the working capacity calculation have

been submitted to and agreed by Lancashire County Council

6.2 No authorised development should be carried out if the working capacity of Work No 1A as agreed by Lancashire County Council... is less than 300 million standard cubic metres at standard temperature and pressure.

Although I would concur that these safety standards do need to be met I would argue that these should be met before an order is granted and not as part of the order.

- iv) The adequacy of the environmental information produced in support of the application for the Development and whether further or updated environmental information is now necessary

I feel that the Environmental impact of the discharge of brine into the Wyre Estuary / Morecambe Bay has not been fully considered. Natural England have previously stated that:

“the construction of the brine outfall pipeline and its subsequent long term presence upon the seabed poses a potential risk of physical disturbance and damage to local marine BAP habitats and fauna”

And I believe that this remains a paramount consideration.

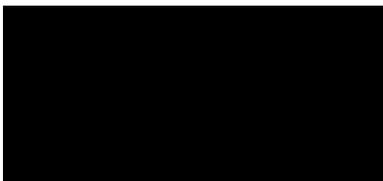
- v) Any other matters arising since 9 April 2013 which interested parties consider are material to the Secretary of State’s re-determination of the application

The potential of the extraction of Shale Gas, I believe, negates the need for this development and would again argue the level of need comes ‘into play’ when considering the development. I would again point out that this application is far less than previous ones and therefore reduces the amount of ‘national need’ that it can satisfy. In addition, numerous other gas storage sites have been developed within the UK, which will more than double storage capacity.

In conclusion I would urge you to once again refuse permission for this development which has plighted security of local residents for over a decade.

Yours sincerely

Eric O Signature

A solid black rectangular box used to redact the signature of Eric Ollerenshaw.

Eric Ollerenshaw OBE
Member of Parliament for Lancaster and Fleetwood



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