

From: [Leigh Gareth \(Energy Development\)](#)
To: [Pridham Robert \(Energy Development\)](#)
Subject: FW: Wyre Estuary Planning Appeal
Date: 08 May 2014 15:36:36

Gareth Leigh
National Infrastructure Consents
E: gareth.leigh@decc.gsi.gov.uk T: 0300 068 5677
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-----Original Message-----

From: MAYNARD, Paul [<mailto:paul.maynard.mp@parliament.uk>]
Sent: 08 May 2014 14:22
To: National Infrastructure Consents
Subject: Wyre Estuary Planning Appeal

Dear Secretary of State,

I write with regard to the application by Halite Energy and their proposed underground storage facility, which I urge you to continue to object to.

I understand you have set four broad criteria against which you request comment, so I have separated my comments accordingly:

1. Geology

Halite's modelling remains based upon 3D anticipatory modelling, as opposed to that based upon the two 'polygon areas' where the storage facilities will be located. Data from these polygon areas was identified as a fundamental requirement in the Planning Inspectorate's January 2013 report. The area remains geologically unstable, and despite repeated opportunities, neither Halite nor its predecessor incarnation Canatxx has been able to demonstrate satisfactorily that the storage can be achieved safely at what is a Site of Special Scientific Interest with a vulnerable ecology.

2. National Policy Statement

The NPS requires a detailed geological assessment to demonstrate a site's suitability. Halite and Canatxx over successive applications have failed in this, let alone the level of detail it requires regarding salt cavities, salt thickness and salt purity. It is worth noting that the onus is on the applicant to demonstrate through the submission of appropriate evidence that the site is geologically suitable, and this has not been done. In applications dating back as far as 2007, a lack of geological data demonstrating suitability has been identified as lacking, and the current application does nothing to remedy that, and there has been no new data to even consider, only an accusation that the Inspectorate in some way 'applied too high a standard' to the geological data - absurd given the safety of 80,000 people is at stake.

3. Environmental Information

The area affected includes a Special Protection Area, a Special Conservation Area, a Ramsar site, the Wyre Estuary SSSI as well as three Biological Heritage Sites. SPAs and SCAs in particular have additional protection under Article 6 of the Habitats Directive, which Natural England has a duty to uphold. Currently, it has not conducted its own research, but rather relied upon that supplied by Hyder on behalf of Halite, when deciding to sign the Statement of Common Ground - a statement that nonetheless recognised the dangers of brine output on the Wyre Estuary.

4. Other matters

There remain a multitude of other potential sites with more suitable geology, further below ground. None of these plans have ever produced local support, as I re-demonstrated at the most recent public hearing by presenting the results of a petition based on the most recent application from Halite. This shows that despite Halite's repeated applications, public opinion cannot be demonstrated as having weakened in its opposition.

Yours sincerely,

Paul Maynard MP.
Blackpool North & Cleveleys

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