



National Infrastructure Consents Team
Department of Energy and Climate Change
2nd Floor Kings Buildings
3 Whitehall Place
London
SW1A 2AW

Phone: (01772) 531948

Email: Stuart.perigo@lancashire.gov.uk

Your ref: PREE-00043

Our ref: PREE-0043 PREE-00071

Date: 11th September 2014

Dear Sir Madam

Consultation on further written representations received (pursuant to rule 20(2) of the Infrastructure Planning (Examination Procedure) Rules 2010) and other relevant information

Receipt of further geological information to supplement the independent Geological Report

PRESALL UNDERGROUND GAS STORAGE FACILITY

I write further to your letter of 31st July 2014 in respect of the above and invitation for further representations on the independent geological report produced by Senergy (GB) Limited on the development and on the representations received during the first consultation round, and your subsequent letter of 14th August 2014 relating to the further geological information produced by Senergy (GB) Limited (hereinafter referred to as Senergy) to supplement its report.

The County Council has previously advised (by letter dated 9th May to the Secretary of State in response to matters raised in correspondence dated 8th April 2014) that the County Council agreed a Statement of Common Ground with the applicant and which was presented to the Examining Panel. At the time the County Council also expressed the view as part of its Local Impact Report that the Examining Panel should be satisfied it had sufficient information before it relating to geological matters to be able to come to the view that the development could be carried out and carried out safely. The County Council acknowledged the findings of the panel and the subsequent concerns of the Secretary of State in respect of the absence of geological information. Notwithstanding the County Councils previous conclusions, it welcomed the opportunity for further geological information to demonstrate the applicant's case that the anticipated total storage capacity of up to 900 million m³ and working capacity of up to 600 million m³ at standard temperature and pressure in the area for cavern development shown on plan A-1000-030 Rev B can be achieved.

Person
Job Title
Location



INVESTORS
IN PEOPLE



2008-2009
Improving Accessibility
2009-2010
Positive Engagement of Older People
Raising Economic Prosperity
through Partnerships
Cohesive and Resilient Communities



The County Council also advised that if the Secretary of State decides on re-determination to grant development consent for the development, it considered that, depending on the interpretation of any additional geological information submitted, that the requirements of requirement 6 of the draft development consent order as recommended by the Examining Authority in its report of 21 January 2013 would need to be reviewed as to what level of information is required.

The County Council acknowledges the information submitted by the applicant and the findings of Senergy following their assessment of the information. It notes that Senergy acknowledges that the data coverage within the proposed development polygons has been improved by the additional seismic data and that in general the geological model for the basin demonstrates the geologically can be validated down to the top of the salt but that there are outstanding concerns regarding the undefined base of the salt which they maintain is not adequately imaged by the new seismic survey in parts of the proposed polygon areas. The County Council further notes the conclusions of Senergy that in the absence of borehole data the base of the salt is not adequately imaged by the new seismic survey and that the interpretation within the development polygons is speculative and unconstrained in the deeper parts of the salt basin.

Senergy conclude that if the base salt is any shallower than currently mapped, the capacity of the proposed facility may be affected and the volumetric calculations demonstrate a significant difference between what is proposed and which could be accommodated in the absence of a clearer understanding of the base of the salt.

The County Council, notwithstanding its previous position on the capability of the salt to accommodate the proposal, is extremely concerned that Senergy consider there is insufficient information to demonstrate the base of the salt which could have significant implications for the proposed capacity of the proposed development. Further, if the proposed capacity is reduced to the degree identified, the County Council is concerned that the benefits associated with such a project and the contribution it would subsequently make to national need would not outweigh the impacts of the development on the local landscape. In this respect the County Council would draw the Secretary of State's attention to Section 9 of the County Council's Local Impact Report relating to the assessment of the impacts on landscaping and Section 17, Conclusions, and in particular paragraph 17.5 where the County Council:

'remains concerned that the visual impact of the proposal and most particularly those associated with the gas compressor station, wellheads and associated infrastructure and tracks on the landscape on the eastern side of the Wyre estuary, during the development phase and operational life of the site until such time as (and if) the proposed planting mitigation proposals are successful (19 years). The nature of these elements of the proposal would be significant due to their design, scale and alien nature in a rural environment and adjacent to the SSSI and Ramsar sites. These elements of the proposed development would result in the introduction of an industrial development which by reason of their scale, design and location would be detrimental to the quality of the open character of the countryside, coastal plain, estuary landscape and Wyre Way. Such impacts would not be sustainable for the purposes of the National Planning Policy Framework and would be contrary to the intentions of Policy EM1, DP7, DF3 and RT9 of the Regional Spatial Strategy, Policies 2, 7, 25 and 31 of the Lancashire Minerals and

Waste Local Plan, Policies SP14, ENV2 and TREC12 of the saved policies of the Wyre Borough Local Plan. The County Council considers that such impacts are contrary to the development plan policies, unacceptable and are not outweighed by the contribution the proposal would make to the national supply of natural gas. The County Council therefore maintains an objection to the proposal on the basis that it would have an unacceptable impact on the visual amenities of the area and for which mitigation would take some considerable period of time and without certainty of any success.'

In paragraph 17.6 of the County Council's Local Impact Report:

'The issue of geology has always been a major concern to the County Council. Notwithstanding the further assessment of geological information by the applicant and the acceptability of such by the County Councils specialist advisors, the County Council requests that the Examining Authority is satisfied that the applicant has demonstrated that the geology is present in a form that is capable of safely accommodating the proposed caverns and that the standoffs between the caverns and those associated with previous solution mining operations are sufficient to ensure the integrity of the proposed caverns in a way that would be safe and not give rise to the migration of gas through the geology of the area or be at risk from seismic movement'.

In light of the findings of Senergy, the County Council reiterates its request that the Secretary of State should be satisfied there is sufficient information relating to geological matters to ensure the development could be carried out safely and that the geology is capable of accommodating the proposed capacity required by the examining panel when it came to its conclusions, and imposed the requirements it did, on the application for the development consent order. Further, if the applicant cannot demonstrate that the development could be carried out safely or provide the necessary capacity specified by the Examining Panel, then the County Council would wish the Secretary of State to carefully consider the benefits a reduced scheme could deliver against the impacts of the proposal on the landscape and to which the County Council has an outstanding objection.

The County Council is aware of the proposals by Halite to review Requirement 6 of the draft development consent order presented to the Secretary of State by the Examining Panel and as set out in the submissions by BLP on their behalf to the Secretary of State by letter dated 9th May 2014 (Para 4.1- 4.6)

If the Secretary of State is or becomes satisfied that the geological information is satisfactory and that the minimum capacity of the proposed development can be achieved, a review of Requirement 6 as proposed by Halite would be appropriate.

Yours sincerely



Stuart Perigo
Head of Development Management