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# Health Impact Assessment of Proposed Underground Natural Gas Storage Facility, Preesall, Lancashire

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## Statement of Common Ground

Date: 7<sup>th</sup> March 2012

Halite Energy Group commissioned a Health Impact Assessment (HIA) of the proposed Underground Natural Gas Storage Facility, Preesall, Lancashire. This was prepared by Ben Cave Associates Ltd between April and November 2011. The HIA was overseen by a Steering Group which met 4 times and comprised the following Members:

JT	Jacqui Thompson	Associate Director of Public Health, NHS North Lancashire [Chair]
GK	George Kowalczyk	Regional Toxicologist, Centre for Radiation Chemical and Environmental Hazards (CRCE), Health Protection Agency
SA	Sohail Ashraf	Cumbria & Lancashire Health Protection Unit
BS	Brian Stanley	Halite Energy Group
DMcA	David McArthur	Wyre Borough Council (invited to be a member but did not participate)

The Steering Group commented on the emerging draft HIA documents and advised on the approach to preparing the HIA and on the final recommendations. The Steering Group members state that the HIA process was satisfactory.

The HIA makes a number of recommendations which are presented in the following Table. The Table sets out Halite's response to the recommendation and explains how the recommendations were dealt with in the application documentation. Particular reference is made to the Draft Heads of Terms (IPC Doc Ref 9.1.4) and the Requirements set out in Schedule 9 of the Draft Development Consent Order (IPC Doc Ref 6.1)

  
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Jacqui Thompson, Assistant Director Public Health, NHS North Lancashire [Chair]

Date: 17-04-12\_\_\_\_\_

Issue	Recommendations	Halite Response
Plant & vehicle emissions including dust and particulate matter	That Halite ensures that its contractors adopt best practicable means to minimise emissions of fugitive dusts from development operations and the storage of materials.	Halite is proposing Requirements which seek ensure that dust from development operations are mitigated i.e. Requirement 14 requires all vehicles to be covered and Requirement 15 requires wheel washing facilities to be provided on site. Requirement 30 also requires a scheme for the management and mitigation of dust emissions to be submitted to and approved by the Local Planning Authority (LPA).
	That the Local Authority monitors the development works and ensure that best practicable means are used to minimise dust emissions.	Requirement 30 requires that a written scheme for the management and mitigation of dust emissions is submitted to, and approved by the LPA. Halite will ensure that the approved scheme is implemented and maintained during the construction, operation and decommissioning stages.
Odour nuisance	That Halite requires its contractors to undertake trial bores or pits to seek to identify previously tipped sites, if any, and determine best practicable means to be employed, if and when necessary, to avoid odour nuisance	Halite has carried out an Environmental Impact Assessment and full Geological Assessment of the site and no 'previously tipped sites' were identified within the project area.
	That the Local Authority monitors the operations and ensures that any nuisance (to occupiers of affected premises) from odour is minimised so far as is reasonably practicable.	Halite has carried out a full Environmental Assessment and there are no operations which would lead to the generation of significant odours that would affect occupiers of premises.

Issue	Recommendations	Halite Response
Operational plant failure	That Halite demonstrates compliance with statutory requirements at all times. This provides comfort to residents by publicising the inspection reports of regulators and third party audits when undertaken.	A number of Requirements require Halite to produce monitoring reports and these will be made available to the public through the Community Liaison Panel
Visual setting & local character	That Halite seeks to minimise visual intrusion into the landscape from their development and operations by siting, screening and designing to the satisfaction of the Local Planning Authority.	The development will have an impact on the visual amenity on the west side of the Wyre Estuary and a landscape and ecological management strategy is proposed to mitigate the impact. Requirements 8 – 10 require the submission of a detailed landscape plan, the provision of landscaping and its maintenance..
Noise disturbance	That Halite observes the requirement to avoid sleep disturbance to occupiers of residential premises adjacent to their development and operations.	Requirement 28 (construction noise) and Requirement 33 (operational noise) seek to control the impact of noise. No part of the development can commence until a noise management scheme is approved by the LPA. Requirement 22 also limits construction of the Project (except for drilling and cavern washing) to daytime hours with no night time working.
	That the Local Planning Authority seek to ensure this through their Local Impact Statement, recommended planning conditions and the activities of their operational regulatory staff.	Halite has drafted the Requirements in consultation with the Local Planning Authorities who will be responsible for ensuring compliance. Requirement 22 states that no part of the development can commence until a noise management scheme is approved by the LPA.

Issue	Recommendations	Halite Response
Vibration disturbance	<p>That Halite requires that all plant be installed using best practicable means to avoid discernible vibration in adjacent residential premises. During the construction of the development the plant and equipment utilised should be selected to avoid vibration nuisance and that hours of use be limited to avoid sleep disturbance.</p>	<p>The Environmental Assessment does not anticipate that vibration will have a significant impact on residential premises during construction. Requirement 22 seeks to limit construction of the Project at night.</p>
	<p>That the Local Planning Authority seek to ensure this through their Local Impact Statement, recommended planning conditions and the activities of their operational regulatory staff.</p>	<p>The Environmental Assessment does not anticipate that vibration will have a significant impact on residential premises during construction.</p>
Traffic impacts	<p>That Halite recognises the duty to avoid any increase in traffic hazards by securing necessary improvement to road junctions used by their contractors and staff.</p>	<p>The application includes improvements to the highway and Requirement 11 seeks to ensure that all points of access are approved by the Highway Authority prior to their construction.</p>
	<p>That the Highway Authority requires this through recommended planning conditions to the IPC.</p>	<p>Requirement 11 (Highway Accesses) requires the submission and approval of written details of the siting, design and layout of any new access to a highway to be used by vehicular traffic.</p>

Issue	Recommendations	Halite Response
Employment market	That Halite seeks to maximise the employment of local labour, where necessary investing in suitable training and education in collaboration with the Local Education Authority.	Provision for maximising the use of local labour is made in the Draft Heads of Terms which states that; <i>“Halite will also seek to employ local people, where possible... Halite, and its supply chain, will promote local borough corporate plan objectives with regard to employment, and whilst recognising the skill requirements of such a project, will, where possible, provide opportunities for apprenticeships, graduate placements and young people not in education and employment or training”</i> .
Use of estuarine and terrestrial leisure opportunities	That Halite ensures that the current leisure opportunities are unaffected by their operations and that any effect on such opportunities is minimised during the development phase.	The Project requires the temporary closure of some rights of way during construction and alternative provision is made as part of the proposals. The Requirements provide a range of mitigation measures that seek to minimise the impact of the Project on the public. The Project also includes the provision of a new observation platform at the Seawall in Fleetwood.
Use of recreational amenities	That Halite minimises any disruption to accessibility to these amenities during the construction phase.	Requirement 23 requires that a Code of Construction Practice is submitted to and approved by the LPA prior to the commencement of any works. Halite will ensure that the impact of the Project on current leisure opportunities are minimised through compliance with the Requirements.
Tourism	That Halite continues to liaise with community groups to maintain an open and informative approach to their undertaking and to respond rapidly to expressed fears and any adverse publicity.	Halite has already established a Community Liaison Panel (CLP) which acts as a link between the Company and community groups. The Draft Heads of Terms makes provision for the continuation and expansion of the CLP and the establishment of a community fund to assist local projects.

Issue	Recommendations	Halite Response
Perceived safety fears	That Halite be open about their liaison with safety regulators and emergency planners and provide public information bulletins about safety audits and exercises as they occur.	The application includes a Risk Assessment which sets out the potential risks arising from the Project and the mitigation that is built into the Project design. Details of safety audits and exercises will be made available through the forum of the Community Liaison Panel.